

Proposed Dwelling to the north of  
554 Canal Bridge,  
Semington,  
TROWBRIDGE,  
BA14 6JT

Job Ref: 4515



FINAL COMMENTS OF THE APPELLANT

August 2026

Ref: 4515

## 1.0 LPA Statement

### 1.1 Technical Matters Fully Resolved and Subject to Approved Conditions.

The LPA's statement of case (Sections 6.1 and 9.2) explicitly confirms that it relies entirely on the original Officer Report and submits no new evidence. The Council concedes that technical matters—including highway safety, access visibility splays, surface water drainage (SuDs), ecology (Great Crested Newts via District Level Licensing), and biodiversity enhancements—have been completely resolved and are fully addressed via recommended planning conditions (Appendix 1).

### 1.2 Narrow Basis for Refusal: Land Use vs. Visual Harm.

The Council acknowledges in paragraph 7.8 that its refusal is not based on poor architectural design, noting that the dwellings single-storey scale and design approach are well-considered. The Council's sole objection therefore rests on the change of land use from an undeveloped parcel to residential curtilage and its perceived contribution to settlement separation.

### 1.3 Misapplication of Settlement Separation (JMNP2 Policy 19).

The LPA argues that the site contributes to the physical and visual gap between Semington and Berryfield. However, the council's own Statement of Case acknowledges that the dwelling is low-profile, single-storey, well screened, and has a limited visual impact as outlined below:

- The site is immediately adjacent to existing residential development (No. 554 Canal Bridge) rather than sitting in isolated open countryside.
- The actual physical buffer between the site and the nearest settlement to the North remains large at over 350m and the green buffer between Semington and Berryfield is in the order of 800m.

August 2026

Ref: 4515

- Inserting a single, low-profile, heavily screened eco-dwelling directly adjacent to the existing buildings around Canal Bridge does not compromise the functional separation or identity of either settlement.

1.4 Paragraph 11(d) of the NPPF “Tilted Balance”.

The LPA confirms that it cannot demonstrate a five-year housing land supply (Sitting at a severe deficit of circa 2.8 years), engaging Paragraph 11(d) of the NPPF . Given that the site is physically non-isolated, directly adjacent to existing dwellings, and delivers an eco-friendly self-build home with net ecological gains, the localised land-use change does not *significantly and demonstrably outweigh* the substantial benefits of housing delivery under the tilted balance.

The proposal also fulfils the statutory demand for Self-build and Custom Housebuilding under the Self-build and Custom Housebuilding Act 2015. Under Paragraph 11(d), delivering a Self-Build/ Custom unit in an area with a severe 2.8 year housing land supply deficit carries significant positive weight that easily outweighs localised, mitigated land-use changes.

- 1.5 Paragraph 7.6 of the LPA appeal statement states *“Even if the proposal is small in scale, the harm arises from the introduction of residential development, domestic curtilage and associated paraphernalia into land which currently contributes to the settlement gap”* However, the site is hidden from surrounding views by high hedges and the landscaping encourages bio-diversity and countryside enhancements with the addition of wildflower planting, Sedum roofs, a large attenuation pond to encourage wildlife as well as materials typically found in the area with natural stone walls, and natural timber cladding therefore minimising the domestic impact of the proposals and the visual impact of the dwelling.

- 1.6 In response to Paragraph 7.8 of the LPA appeal statement that states *“Policy 18 is also relevant because it requires development to respond sensitively to settlement edges and the transition between settlement and countryside, and to conserve or enhance the openness and character of the open countryside. The proposal would fail to do so because it would change the character of the site from undeveloped agricultural/paddock land to residential curtilage”* The proposed design allows for this as stated in 1.5 above in that the proposals are a sensitive design with appropriate landscaping to mitigate the impact of the proposals on this undeveloped site. It should also be noted that the site has very little commercial agricultural use given the small size.

August 2026

Ref: 4515

- 1.7 Paragraph 7.9 of the LPA appeal statement that states “the Appellant’s reliance on low-profile design and landscaping fails to overcome “fundamental landscape harm,” arguing that the mere introduction of built form, domestic curtilage, and associated activity inherently harms the open rural landscape” We Appellant strongly refutes this on the following grounds:
- **Conflation of Change with Harm:** The LPA conflates a minor change in land use with demonstrable planning harm. Paragraph 7.8 of the Council's own statement concedes that the dwelling’s single-storey scale and design approach are well-considered and do not warrant refusal on design grounds. The site is a small, visually self-contained parcel directly contiguous with existing residential development at No. 554 Canal Bridge, rather than an exposed or prominent feature within the wider countryside
  - **Proportionality Under the Tilted Balance:** Under Paragraph 11(d) of the NPPF—which the LPA accepts is engaged due to its severe 2.8-year housing supply deficit—planning permission must be granted unless adverse impacts *significantly and demonstrably* outweigh the benefits. The localised introduction of a single low-slung, single-storey residential property on a site bounded by established hedgerows cannot reasonably be characterized as causing “fundamental landscape harm” sufficient to override the presumption in favour of sustainable development.
  - **Sustained Boundary Screening and Sensitive Design:** The proposal does not rely on visual mitigation to conceal an inappropriate structure; rather, the site’s natural topography, existing mature boundary hedgerows, and the low-profile rooflines (featuring integrated sedum and timber cladding) ensure the development organically integrates into the settlement fringe without eroding the broader countryside character or reducing the 350-metre spatial gap between the site and Berryfield.
  - **Domestic Activity and Environmental Quality:** The LPA offers no technical evidence demonstrating how the low-impact domestic activity of a single eco-dwelling would harm the rural landscape. On the contrary, the proposed native landscaping, SuDS attenuation pond, and biodiversity enhancements (secured via Conditions 3 and 5) will actively enhance the ecological and environmental quality of this unkempt parcel compared to its current unmanaged state.

August 2026

Ref: 4515

- 1.8 The LPA's Reason for Refusal 1 claims that the site is "poorly related to services" and reliant on private cars, however the councils own statement (Paragraph 7.10 of the LPA appeal statement) acknowledges nearby facilities, bus routes, and cycle paths exist. With the bus stop being directly (almost immediately) outside the entrance to the site offering immediate non-car access to both Melksham and Trowbridge.

## 2.0 Relevance of Parish Council comments.

- 2.1 Melksham Without Parish Council cites an appeal dismissal for land South of 214B Corsham Rd Ref: PL/2025/08613 to justify its objection under JMNP2 Policies 6 & 19. The precedent is fundamentally inapplicable to the current appeal for the following reasons:
- **Scale and Intensity:** Scheme PL/2025/08613 comprised a speculative outline proposal for 5No. dwellings, representing a substantial intensification of built form. The current appeal is for 1No. single-storey, highly sustainable dwelling.
  - **Proximity and Settlement Gap:** The site in PL/2025/08613 sits on the Southern edge of Whitley, whereby the open gap to the neighbouring settlement of Shaw is a mere 120m. In that case, 5No. dwellings directly encroach into a critical, highly sensitive 120m gap. By contrast the appeal site at Canal Bridge retains a substantial gap of over 350m between the site and Berryfield to the North which also has further agricultural land to the West therefore lessening the impact of a single dwelling.
  - **Context and Relationship:** Unlike PL/2025/08613, the proposed dwelling sits directly adjacent to neighbouring properties (554 Canal Bridge), representing a modest, logical addition to the area rather than an intrusion into a narrow inter-settlement pinch point.

## 3.0 Public and Neighbour Support.

3.1 In stark contrast to the Parish Councils generalised assumptions regarding character and transport please note:

- There are no neighbour objections to the proposals
- The Direct neighbours have endorsed the proposals, With the occupants living directly opposite and adjacent to the application site submitting formal representations of support and confirming they have no objections to the proposed dwelling.
- Local residents support the appeal. Highlighting that the site is an unkempt/ unused parcel of land, directly served by a bus stop immediately outside of the site, within walking distance to village amenities including the school, and directly linked to established cycle routes to Melksham, Trowbridge and beyond.

## 4.0 Case Officers Draft Conditions.

4.1 Should the Inspector be minded to allow the appeal, the LPA has provided a comprehensive set of agreed planning conditions (Appendix 1, Conditions 1-9) covering:

- Detailed Suds management restricted to 1l/s discharge rate.
- Strict external lighting controls to safeguard commuting/ foraging bats
- Standard highways access, bound surfacing, turning, and visibility splays.

These draft conditions confirm that all technical, environmental, and highways matters are fully resolved, leaving the Planning Inspector with a clear basis to grant planning approval.



## **TOWN AND COUNTRY PLANNING ACT 1990**

### **SECTION 78 APPEAL**

#### **STATEMENT OF CASE**

**Appeal Reference:** 6012410

**LPA Reference:** PL/2026/02084

**Site Address:** 554 Canal Bridge, Semington, Trowbridge, BA14 6JT

**Appellant:** Mr K Lockwood

**Development Description:** Proposed erection of 1no. high-quality, sustainable, single storey dwelling including car port, home office; new planting and biodiversity enhancement measures.

**Procedure:** Written Representations

**Prepared by:** Lucie Turner

**Date:** 10 August 2026

## **CONTENTS**

- 1. Introduction**
- 2. Site Description**
- 3. Planning History**
- 4. The Proposal**
- 5. Relevant Planning Policy and Guidance**
- 6. The Council's Case**
- 7. Comments on Appellants Statement of Case**
- 8. Planning Balance**
- 9. Summary and Conclusions**
- 10. Appendices**

## 1.0 Introduction

- 1.1 This Statement of Case is submitted on behalf of the Local Planning Authority in response to the appeal lodged by Mr K Lockwood against the decision of the Council to refuse planning permission for the *Proposed erection of 1no. high-quality, sustainable, single storey dwelling including car port, home office; new planting and biodiversity enhancement measures* at 554 Canal Bridge, Semington, Trowbridge, BA14 6JT.
- 1.2 The purpose of this statement is to set out the Council's case and explain the reasons why planning permission was refused. The decision was issued on 3<sup>rd</sup> July 2026 following consideration of all relevant material planning matters. The refusal was based on the following reasons:

*1 The proposed development, due to its location outside the defined settlement boundaries of Semington and Berryfield within the open countryside, represents an unsustainable form of development that is contrary to the spatial strategy set out in Core Policies 1, 2 and 15 of the Wiltshire Core Strategy.*

*The proposal would result in the unjustified encroachment of residential development into the countryside and would fail to support a sustainable pattern of growth. The site is poorly related to services and facilities and future occupiers would be likely to rely predominantly on the private motor vehicle, contrary to Core Policies 60 and 61 of the Wiltshire Core Strategy and the aims of the National Planning Policy Framework.*

*Furthermore, the proposal would erode the physical and visual separation between Berryfield and Semington, contrary to Policy 19 of the Joint Melksham Neighbourhood Plan, which seeks to maintain the separation between those settlements. The proposal would also fail to conserve the openness of the countryside and maintain the transition between settlement edge and countryside, contrary to Policy 18 of the Joint Melksham Neighbourhood Plan.*

*When assessed against paragraph 11(d) of the National Planning Policy Framework, the adverse impacts of the development are considered to significantly and demonstrably outweigh the benefits.*

*2 The proposed development would introduce built form, domestic curtilage and associated paraphernalia into an undeveloped parcel of agricultural land that contributes to the open and rural character of the area. The development would result in the urbanisation of the site and would harm the character and appearance of the countryside, which is characterised by open fields and limited built form.*

*As such, the proposal is contrary to Core Policy 51 of the Wiltshire Core Strategy, Policy 18 of the Joint Melksham Neighbourhood Plan 2 and the aims of the National Planning Policy Framework, which seek to recognise and protect the intrinsic character and beauty of the countryside.*

- 1.3 This statement has been prepared in accordance with the Planning Inspectorate's Procedural Guide for Planning Appeals and complies with the requirements of the Town and Country Planning Act 1990 (as amended) and associated regulations. It provides a clear and robust justification for the Council's position, referencing relevant planning policy, guidance, and material considerations.
- 1.4 In accordance with the requirements of the Planning Inspectorate guidance on the use of artificial intelligence in casework evidence, it is confirmed that this document was prepared with assistance from Microsoft Copilot. Copilot was used for proofreading purposes and to avoid unnecessary repetition. All suggested amendments by Copilot were reviewed and verified by the author to ensure that the content is accurate and fully reflects the Council's intended position and professional assessment.

## **2.0 Site Description**

- 2.1 The LPA is not aware of any material changes to the site since the application was determined. Accordingly, the site description set out in the original Officer Report, already provided to the Planning Inspectorate, remains accurate and relevant for the purposes of this appeal.

## **3.0 Planning History**

- 3.1 There have been no changes to the planning history of the site since the application was determined. Therefore, the summary contained within the original Officer Report, already provided to the Planning Inspectorate, remains accurate and relevant for the purposes of this appeal.

#### **4.0 The Proposal**

- 4.1 There have been no amendments to the proposed development since the application was determined. Accordingly, the description of the proposal set out in the original Officer Report, already provided to the Planning Inspectorate, remains accurate and relevant for the purposes of this appeal.

#### **5.0 Relevant Planning Policy and Guidance**

- 5.1 There have been no changes to the relevant national or local planning policies, nor to associated guidance, since the application was determined. All applicable policies and guidance are set out in the original Officer Report, which has already been provided to the Planning Inspectorate.

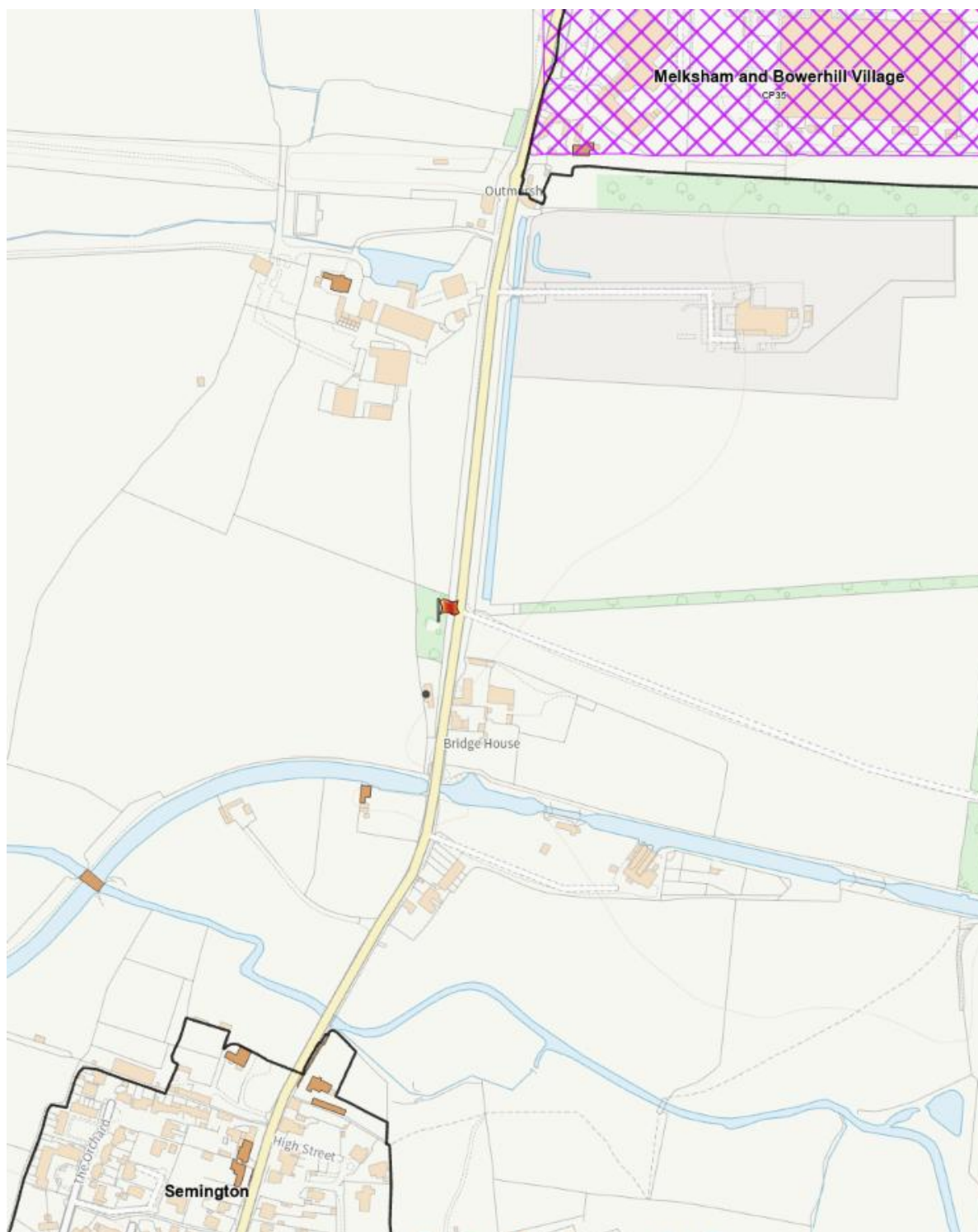
#### **6.0 The Council's Case**

- 6.1 The Council relies entirely on the evidence and assessment contained within the original Officer Report, which has already been provided to the Planning Inspectorate. No additional points or further evidence are submitted. Accordingly, the Officer Report forms the Council's full case for the purposes of this appeal.

#### **7.0 Comments on Appellants Statement of Case**

- 7.1 Below is the Council's assessment of the Appellant's Statement of Case. Commentary is provided where necessary to address points of disagreement that go beyond what has already been set out in the original Officer Report already sent.
- 7.2 The appellant confirms at point 2.2 of their statement that the tilted balance is "explicitly engaged" due to the significant shortfall in housing supply. The Council does not dispute that it is currently unable to demonstrate a five-year supply of deliverable housing land and accepts that paragraph 11(d) of the Framework is engaged. This position was fully recognised in the officer report. The issue in dispute is therefore not whether the tilted balance applies, but whether the adverse impacts identified by the Council significantly and demonstrably outweigh the benefits of the proposal.

- 7.3 Paragraph 2.3 of the statement suggests “the rigid application of settlement boundaries to block a high-quality, single storey, self-build dwelling misjudges the planning balance given the severe housing shortfall”. The Council acknowledges that the proposal would deliver one additional self-build dwelling and that this attracts positive weight in the context of the housing land supply shortfall. However, the contribution of one dwelling is necessarily limited in scale and was appropriately weighed as a modest benefit in the officer report.
- 7.4 The Appellant’s Statement of Case next turns to the site’s location. Whilst acknowledging it is outside of the defined settlement boundaries of Semington and Berryfield the appellant considers the site is “geographically and physically non-isolated.” The Council does not contend that the site is isolated in the strictest sense. The issue is that the site lies outside the defined settlement boundaries of both Semington and Berryfield and occupies largely open land that contributes to the separation between those settlements. The following image is an extract from the Wiltshire Core Strategy, with the limits of the settlement boundaries of Bowerhill and Semington indicated by the heavy black lines to the north and south of the site (indicated by a red flag) respectively:



- 7.5 The appellant contends that the site is an organic pocket of development and effectively rounds off the village edge. The Council does not accept the appellant's characterisation of the site as logical rounding off. The fact that a site is near existing built form does not automatically make it "rounding off", especially where the site performs a separate policy function as open land between settlements.

- 7.6 The application site is an undeveloped field parcel outside the defined settlement boundaries of both Semington and Berryfield. It forms part of the open countryside between the two settlements and contributes to their physical and visual separation. Even if the proposal is small in scale, the harm arises from the introduction of residential development, domestic curtilage and associated paraphernalia into land which currently contributes to the settlement gap. The issue is not simply one of visual prominence, but of the role and function of the site within the countryside gap. This is precisely the type of land to which Policy 19 of the Joint Melksham Neighbourhood Plan 2 is directed.
- 7.7 The appellant's statement places considerable emphasis on the limited visual impact of the dwelling. The Officer report acknowledges this. However, Policy 19 is concerned less with visual impact and more with maintaining the separation between named settlements. The Council's case is that the appeal site makes a contribution to that separation by virtue of its undeveloped, open character and location between Berryfield and Semington. The proposal would reduce that contribution by introducing a residential use and domestic character into the gap.
- 7.8 Policy 18 is also relevant because it requires development to respond sensitively to settlement edges and the transition between settlement and countryside, and to conserve or enhance the openness and character of the open countryside. The proposal would fail to do so because it would change the character of the site from undeveloped agricultural/paddock land to residential curtilage. In the context of Policy 18 it should be noted that the Council's refusal is not based on poor architectural design. The officer report expressly acknowledged that the dwelling is single-storey, that the design approach is well considered, and that the proposal would not, in isolation, justify refusal on design grounds. However, the Council's concern is the change in land use and character arising from the introduction of residential development into an undeveloped countryside parcel.
- 7.9 The appellant's reliance on screening and low-profile design does not overcome the fundamental landscape harm identified. The development would still introduce built form, domestic curtilage, access arrangements, parking, garden areas and associated residential activity into a parcel of land currently forming part of the open rural landscape.
- 7.10 The appellant lists a number of nearby facilities bus routes and cycle routes. The Council acknowledges that some facilities and cycle routes exist within the wider area. However, the site remains outside the defined settlement boundaries and is not located within the planned settlement framework for new housing. Accessibility to individual facilities does not, of itself, override conflict with the spatial strategy or the specific settlement separation policies of the made neighbourhood plan. The provision of a

home office, cycle access and electric vehicle charging are noted, but these are site-specific features and do not change the locational characteristics of the site.

## **8.0 Planning Balance**

- 8.1 The Council relies largely on the planning balance assessment set out in the original Officer Report, which has already been provided to the Planning Inspectorate. Since determination, no material change has occurred which alters that assessment. The Council notes that the ecological concerns relating to great crested newts were addressed through submission of a District Level Licensing Impact Assessment and Conservation Payment Certificate, and that matters relating to drainage, highway safety and biodiversity enhancement are capable of being addressed through appropriately worded planning conditions. These matters do not form reasons for refusal and do not alter the Council's conclusion that the adverse impacts of the proposal significantly and demonstrably outweigh the benefit of single dwelling.

## **9.0 Summary and Conclusions**

- 9.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, the starting point for decision-making is the development plan. The Council has assessed the appeal proposal against the adopted development plan and all other material considerations.
- 9.2 The Council's case is not that the proposed dwelling is poorly designed, nor that the site is wholly inaccessible, nor that technical matters such as ecology, drainage or highway safety could not be addressed. Indeed, those matters are capable of resolution through planning conditions and do not form part of the reasons for refusal. Rather, the Council's case is that the appeal site is an undeveloped parcel of countryside outside the settlement boundaries of both Semington and Berryfield, located within land which contributes to the physical and visual separation between

those settlements. The proposal would introduce residential built form, domestic curtilage and associated activity into that land, thereby reducing its contribution to settlement separation and harming the open rural character of the area. The proposal is therefore contrary to the spatial strategy of the Wiltshire Core Strategy and to Policies 18 and 19 of the Joint Melksham Neighbourhood Plan 2. Those harms significantly and demonstrably outweigh the benefits of one additional dwelling.

- 9.3 For these reasons, the Council concludes that the appeal scheme does not accord with the development plan and does not benefit from the presumption in favour of sustainable development set out in the NPPF. Accordingly, the Council respectfully requests that the appeal be dismissed.

## **10.0 Appendix 1: Suggested planning conditions**

- 10.1 Without prejudice, should the Inspector be minded to allow the appeal, the Council requests that the following conditions be imposed to ensure the development is acceptable in planning terms and in accordance with paragraph 57 of the NPPF and relevant PPG advice on the use of planning conditions:

1. The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out in accordance with the following approved plans and documents:

- Site plan 4515 - al-1-02C received 13 May 2026
- 4515 - Design and Access Statement - 2026-05-08 received 8 May 2026
- Existing and Proposed Site Block Plan - Showing SuDs 4515 - al-1-02 received 22 Apr 2026
- Surface Water Drainage Strategy received 22 Apr 2026
- SuDs validation checklist received 22 April 2026
- Flood Risk Map 10 Apr 2026
- Location Plan received 27 Mar 2026

- Proposed Elevations and Floor Plans - House and Office / Car Port 4515 - al-1- 03A received 27 Mar 2026
- Preliminary Ecology Appraisal received 27 Mar 2026
- Application Form received 27 Mar 2026
- DLL-ENQ-WILT-00152 - 554 Canal Bridge, Semington - Countersigned IACPC with Annex 3 map received 2 July 2026

REASON: For the avoidance of doubt and in the interests of proper planning

**3.** No development shall take place until a detailed surface water drainage strategy has been submitted to and approved in writing by the Local Planning Authority. The strategy shall be based on sustainable drainage principles and shall demonstrate compliance with the National Planning Policy Framework, Planning Practice Guidance, the Non-Statutory Technical Standards for Sustainable Drainage Systems and Wiltshire Council's drainage requirements. The strategy shall include:

- a) A drainage layout plan showing the proposed surface water drainage network and discharge arrangement to the receiving ditch;
- b) Details of pre-development and post-development exceedance flow routes demonstrating that exceedance flows will be managed without increasing flood risk to people, property or infrastructure;
- c) Confirmation that the discharge rate from the site will be restricted to 1 litre per second (1 l/s), together with supporting calculations.

The approved drainage scheme shall be implemented in full prior to the first occupation of the development and thereafter retained and maintained in accordance with the approved details.

REASON: To ensure that surface water is managed appropriately, to prevent an increased risk of flooding on or off the site, and to secure the provision of a sustainable drainage system, in accordance with Core Policy 67 of the Wiltshire Core Strategy, the National Planning Policy Framework and the Planning Practice Guidance.

**Additional Explanation:** This condition is imposed at the request of the Lead Local Flood Authority (LLFA). Whilst the submitted drainage strategy is acceptable in principle, further technical information is required to demonstrate that surface water can be discharged safely

to the receiving ditch, that exceedance flows will not increase flood risk on or off the site, and that the discharge rate can be restricted to 1 litre per second in accordance with the LLFA's recommendations.

**4.** No external lighting shall be installed within the site unless details of the proposed lighting have first been submitted to and approved in writing by the Local Planning Authority. The details shall demonstrate accordance with the Institution of Lighting Professionals Guidance Notes for the Reduction of Obtrusive Light (GN01:2021) and GN08/23 Bats and Artificial Lighting at Night. The lighting shall thereafter be installed and retained in accordance with the approved details.

REASON: To avoid illumination of wildlife-sensitive habitats and to protect foraging and commuting habitat used by bats in accordance with Core Policy 50 of the Wiltshire Core Strategy.

*Additional Explanation:* The Council's Ecologist identified the site and surrounding area as suitable for use by foraging and commuting bats and advised that any external lighting should be carefully controlled to avoid impacts on wildlife-sensitive habitats

**5.** Prior to first occupation of the dwelling, details of biodiversity enhancement measures, including the number, specification and locations of bat boxes, bird boxes, bee bricks and herpetofauna refugia/hibernacula, shall be submitted to and approved in writing by the Local Planning Authority. The approved measures shall be installed prior to first occupation and thereafter retained.

REASON: To secure biodiversity enhancements and ecological gains in accordance with Core Policy 50 of the Wiltshire Core Strategy and the National Planning Policy Framework.

*Additional Explanation:* The submitted ecology information proposed biodiversity enhancements, including bat and bird boxes, bee bricks and hibernacula. The Council's Ecologist supported these measures and recommended that they be secured by condition.

**6.** No part of the development hereby permitted shall be occupied until the access works, turning area & parking spaces have been completed in accordance with the details shown on the approved plans. The areas shall always be maintained for those purposes thereafter

REASON: In the interests of highway safety.

**7.** The development hereby permitted shall not be first occupied until the first 10m of the access, measured from the edge of the carriageway, has been consolidated and surfaced in a bound material (not loose stone or gravel). The access shall be maintained as such thereafter.

REASON: In the interests of highway safety

**8.** The dwelling hereby approved shall not be occupied until measures have been implemented to prevent surface water discharging from the site onto the public highway. Those measures shall thereafter be retained and maintained.

REASON: To ensure that the highway is not inundated with private water.

**9.** No part of the development shall be first occupied until the visibility splays shown on the approved plans have been provided. The visibility splays shall thereafter be maintained free of obstruction above a height of 600mm above the level of the adjacent carriageway.

REASON: In the interests of highway safety.