LCC/SRBC3

Appendix 3l

Vectos to South Ribble 12/11/21

vectos.

Vectos
Oxford Place
61 Oxford Street
Manchester
M1 6EQ

0161 228 1008

vectos.co.uk

12th November 2021

(FAO Janice Crook)
South Ribble Borough Council
Civic Centre
West Paddock, Leyland,
Lancashire, PR25 1DH

Ref: 211112_SRBCLET_PWJC_VN211918

Dear Janice,

Pickering's Farm Site, Penwortham (Land East of Penwortham Way and West of Leyland Road)

Following the submission of the planning applications (Ref: 07/2021/00886/ORM and 07/2021/00887/ORM), and our previous letter dated 14th October 2021, we have the further comments provided by LCC Highways on the 20th October 2021 and the National Highways response dated the 30th September 2021. We have also considered the responses recently received from LCC PRoW dated the 29th October 2021 and Network Rail dated the 9th November 2021.

This letter provides a response to items raised, either providing additional clarity, highlighting the presence of relevant information already included in the Transport Assessment (TA) or supplementing the original assessment with additional information, design and sensitivity assessments based on the requests from both LCC Highways and National Highways.

Where possible, we use the corresponding headings from the LCC Highways letter of the 20th October 2021, and note where these align with points also referenced by National Highways, LCC PRoW and Network Rail.

Masterplan

LCC Highways was not aware of the submitted masterplan at the time at which it drafted its comments. It raised the lack of a masterplan as a significant concern, but highlighted that if a masterplan has been produced, they would be more than happy to provide detailed statutory comments.

This matter was discussed with LCC Highways at a meeting on the 28th October 2021 when it was highlighted that a masterplan document had been produced and submitted alongside each of the planning applications. Additionally, a copy of the full masterplan was provided to LCC Highways by Avison Young on the 28th October 2021.

For clarity, the masterplan identifies a proposed design to support the overall scale of development on the allocated site. The TA identifies specific mobility, transport and highways relevant infrastructure within the local community and the masterplan (i.e. land use types and open space within the masterplan and surrounding community, active travel networks throughout the site, active travel access points providing permeability and connectivity with the neighbouring communities and further afield, primary vehicular access on Penwortham Way, all modes access via Bee Lane, management by Community Concierge, Primary and Secondary Mobility Hubs incorporating micro-consolidation and community facilities, Third Place working and shared travel systems including a new bus service etc.) that will be delivered as part of the scheme.

The commitment to the infrastructure will be through conditions and obligations, providing certainty to the Council that the infrastructure can and will be delivered in a timely manner.

Proposed Penwortham Way Primary Vehicular Access

With regards to the primary vehicular access on Penwortham Way, which we feel is an appropriate and reasonable option, LCC Highways has indicated that it supports the proposed layout which provides dedicated turning lanes into and out of the site to facilitate movement. It does not, however, agree with the principle of a single vehicular access for in excess of 1,000 homes. It suggests that in the interest of connectivity by all modes, a second vehicular access should be provided (i.e. a vehicular link to Kingsfold Drive).

There is no evidence for judging that a single vehicular access for in excess of 1,000 homes is inappropriate, and there is no evidence for judging that a vehicular access into the residential streets of Kingsfold makes a material difference to the performance of the Penwortham Way junction, or for the effect of traffic on the residential streets of Kingsfold.

The evidence that does exist is contained within the TA, with additional modelling evidence set out below. The mathematical analysis, including through micro-simulation and stand-alone junction modelling, leads to a sound conclusion that the proposed methods of vehicular access are appropriate and reasonable.

In addition, it is noted in the TA, and has been in subsequent meetings, that a vehicular Kingsfold link cannot be delivered by the scheme due to land ownership constraints. Active travel connectivity with Kingsfold, a higher priority form of connectivity in terms of sustainability, health and social interaction, is good, with five points of access, upgraded from their existing footpath status to accommodate walkers, cyclists and micro-mobility.

LCC Highways has queried why there is no sustainable travel infrastructure proposed at the primary vehicular site access on the existing A582. Within the TA, the junction option with the existing A582 does not include active travel infrastructure. The junction option with the proposed dualled A582 does include active travel infrastructure. The reason for the former is that the existing A582 does not have active travel infrastructure at this point, and so there is no such infrastructure to tie into. The A582 is not a strong active travel desire line to major destinations, and in the absence of facilities along the A582, and the existence of more attractive alternative routes, an active travel connection was not proposed. The reason for the latter is that, as part of the dualling scheme, the A582 will have active travel infrastructure, and so active travel infrastructure has been included within the scheme to tie into this. Of course, it should be noted that shared travel vehicular infrastructure can and will use this junction and in this respect, both layouts include for sustainable travel.

Given LCC Highways' comment, an offer is made to provide for active travel infrastructure in all junction layouts, secured through legal agreement if necessary, with the detail being determined at detailed junction layout design stage. This is already included in one option, and it makes no difference to the traffic performance analysis associated with the other.

As requested by LCC Highways, an isolated junction model using LinSIG has been produced for the site access on Penwortham Way. Traffic flows have been extracted from the micro-simulation model. The results are presented in a supplementary Technical Note 03 – Traffic Data and Modelling which is attached to this letter. It would be unusual to expect two traffic models assessing the same situation to lead to different conclusions, and that is the case here. The original micro-simulation model is the more sophisticated model, and the stand alone LinSIG model corroborates the judgements from the former. In neither case have the modellers considered it necessary to apply the additional modelling step associated with a guidance compliant 'Vision and Validate' approach to assessment compared with the historic 'Predict and Provide' approach. We explain this further below.

Proposed Bee Lane Access

LCC Highways has indicated that it is very concerned about the proposals to retain the existing carriageway over the Bee Lane bridge without suitable sustainable provision to satisfy future demand.

Technical Note 04 – Bee Lane is attached to this letter and explains the current shared surface and mixed mode use of the bridge, including the low vehicular flows. It explains the change that is likely as a result of the scheme, judging that vehicular flows will remain low.

These low flows, and observations recorded of all movements along the existing bridge, led to the judgement that the existing carriageway would remain suitable as a shared surface to accommodate the future predicted use by all modes, where no single form of transport is afforded priority. There have been no recorded accidents on the Bee Lane bridge (or the Flag Lane bridge further south) in the last 15 years.

Whilst this remains, in our view, a reasonable option, we are cognisant of the fact that Network Rail perceive there to be an increased risk of vehicles striking the structure as a result of collision avoidance action. We have therefore taken the opportunity, as an option, to consider the more formal delineation of a route for active travel purposes, and the creation of a give-way priority working for motor vehicles. This is the principle adopted at the Flag Lane bridge and at the Coote Lane bridge. A possible, but not necessarily unique, layout is presented in Technical Note 04 – Bee Lane.

In addition to the carriageway over the bridge, LCC Highways has indicated that the junction of Bee Lane/Leyland Road does not include suitable sustainable provision to satisfy future demand. It was acknowledged in the TA that consideration could be given to an improvement at this location to improve crossing movements for active travel modes.

In light of the County's comments, an improvement option to provide controlled crossings is presented in Technical Note 04 – Bee Lane with the aim of improving active travel connections to and from the east, including links to the Old Tram Line providing active travel access to Preston city centre and Preston railway station.

The improvement will provide controlled crossings at the Bee Lane/Leyland Road junction and would not only assist with active travel movements at the junction, but a better balancing of traffic movements on the highway. This is set out in Technical Note 04 – Bee Lane , along with an analysis of traffic performance which shows no change for most of the day, and a marginal difference in the traditional commuter peak.

Flag Lane and Other Access

The TA highlights that there will be no access to the development by vehicles from the existing 'lanes', with the exception of 40 homes served by vehicle across Bee Lane bridge. As such, no changes are proposed to the existing Flag Lane bridge which will continue to accommodate existing vehicular demands, and future active travel demands.

In addition, whilst many of the comments provided by LCC Highways relate to the development connecting to existing shops, services and amenities in adjacent communities, it should also be emphasised that existing residents of these communities will have the benefit of accessibility to more facilities and services by active travel and shared travel as a result of the development.

A series of plans are presented in the TA highlighting the good connectivity with the neighbouring communities, and onward connectivity to higher order locations, such as Preston centre and the railway station.

Public Transport

A commitment will be made, and delivered through obligations, to provide a new 30 minutes bus service accessing the site via Penwortham Way. It should be noted that in making this commitment, the risk lies with the developer to ensure that the service (or alternative) remains available, remembering that travel by bus is only one form of shared travel. This is in addition to the existing bus facilities that are accessible within Kingsfold and Leyland Road and The Cawsey, that are accessible from the community.

LCC Highways comments that existing use of public transport for commuting is low within the existing communities and that a bus service which is less frequent than existing services would offer little by way of an attractive alternative to the private car. Shared travel services, including buses, perform many functions, and it is not their sole purpose to persuade people using cars not to use cars. They provide for choice and for social inclusion. In sustainability terms they are also a benefit in comparison to single occupancy car use. The propensity to divert people onto buses that would otherwise use cars is also a function of the wider transport strategy, including provision of road capacity for private cars, parking policies, pricing structures and peer attitudes.

We do not agree with LCC Highways, if that is the implication, that providing this service is not a valuable addition to the sustainable travel network, to choice, to social inclusion and in providing alternatives to those looking for alternatives to the private car for some trips.

We note that it is not only the frequency of service that influences attractiveness but also destinations served, journey time to destinations and infrastructure at stops. In addition, the information presented by LCC Highways only considers journeys to work, which is one journey purpose and not necessarily the most prevalent when considered across the whole day. As such, the provision of a new, direct service between the site and Preston city centre, when considered along with the existing choice of services available, will contribute to a good level of accessibility for future residents and the existing communities.

It is also important to note that bus travel is only one form of shared travel and many opportunities exist to consider more innovative measures that draw on established technology (i.e. car sharing, car pooling, micro-mobility, demand responsive travel, Mobility as a Service). Opportunities exist to promote a range of shared travel options, to a range of destinations, and for a range of journey purposes, via the Mobility Hub and Community Concierge team, which forms part of the overall development proposals.

Parking

A query has been raised by LCC Highways in relation to parking proposed as part of the development and whether the provision of parking in accordance with local guidance has the potential to undermine the proposed access strategy which emphasises the opportunities to travel by non-car modes.

We are keen to discuss the detail of parking with LCC Highways further such that the masterplan continues to provide the best layout and facilities to provide for local and sustainable living. For example, we would welcome discussing reducing parking provision below the historical provisions for the new development in the area, and the balance between residential on and off plot parking. We would welcome a discussion on parking at the school and community centre, and the potential for limited parking based on a hybrid approach derived in the context of local sustainability and the Mobility Hub network.

Cycling and Walking

The TA highlights the commitment to upgrade the existing rights of way that run through the site and provide excellent opportunities to connect with the existing communities of Kingsfold, Penwortham, Tardy Gate and Lostock Hall, enabling one community and local living. Individual routes are identified along with consideration of what additional infrastructure would enhance these routes to assist with the promotion of active travel (i.e. improved width, surfacing, lighting etc). Many of the routes identified for upgrade in the TA are referenced in the response provided by LCC PRoW, and we would welcome the opportunity to discuss the technical detail of improvements to these routes with LCC.

LCC has expressed concern about the use of single distance measurements from the site centre as a means of making judgements about accessibility. The TA includes distance measurements to amenities from a variety of locations around the site, including, but not only, the distance measurements from the centre of the site that LCC references. Therefore, we note that the TA does not rely upon single distance measurements.

LCC has also queried whether distances are crow fly distances. We confirm that they are not. The TA includes three figures (Figure 2.2, Figure 2.3 and Figure 2.4) highlighting 1km and 2km catchments where the distance measurements have been made along specific and practical routes, and from the range of starting points within the site. Our view is that the information presented allows an informed judgement to be made about distance accessibility.

LCC has queried the appropriateness of active travel infrastructure beyond the site and within the existing communities. With respect to existing active travel infrastructure within the communities of Kingsfold and Tardy Gate, it is our view that these communities have a good provision for active travel movement. Further afield, we say that active travel connectivity is excellent, including the Old Tram Line network of active travel infrastructure connecting with many locations, including Preston city centre, Avenham Park and the railway station, and the various road space reallocations that the authorities have implemented in the area to provide dedicated cycle lanes.

If LCC does not agree that the existing communities are well served by active travel provision, we would be delighted to speak with LCC Highways further about any specific opportunities (i.e. dropped kerbs, tactile paving, crossing provision, signage etc.) that could be explored further, linked reasonably to the proposed development. In light of the LCC Highways comments, one such opportunity that we have identified is an additional controlled crossing on Leyland Road to better provide for active travel access to Moor Hey School. This is a commitment that the scheme offers to make, subject to detailed agreement, and through either conditions or obligations.

Access to employment has been queried in the LCC Highways response. Whilst it is not clear at this stage the exact context of the comment, it is important to note that employment includes those people working in local shops, schools and medical centres (to name a few), as well as more significant employment districts in Leyland, Bamber Bridge and Preston city centre. The catchments presented in the TA demonstrate that there are a range of employment opportunities available within the various active travel and shared travel catchments. In addition to existing opportunities, the development proposes a Third Place working facility for occasional ‘home working’, which also serves as an anchor enabling other trips to be contained locally. The current guidance and comment from the ONS suggests that post Covid-19, there is an expectation that home working, including Third Place working will constitute in the order of 30% - 40% of working at any specific time in the week.

LCC has queried the distances that people will walk in the future. As noted in the TA, reference is made to guidance and research relating to how far people walk and cycle. One such source prepared by WYG references data from the National Travel Survey to derive 85th percentile walking distances for a range of journey purposes. This provides a useful guide as to how far people were walking at the time of the surveys, but as noted in the TA, propensity to walk is not exclusively a function of distance with it also being related to journey purpose, the quality of the local environment, peer culture and convenience. With all of this in mind, and in the context of emerging trends that were prevalent before Covid-19, it is reasonable to assume that the use of active travel modes will become more prevalent for a range of journey purposes.

Overall, we agree with LCC Highways' view that the site is well positioned on the periphery of the built environment, and welcome LCC Highways' support for sustainable development.

Discounting and 'Vision and Validate'

LCC Highways makes reference to the fact that it is not satisfied with the discounting of private car trips within the modelling assessments.

It appears that there may be some confusion with regards to perceived trip discounting and the adoption of a 'Vision and Validate' approach. The trip forecasts have not been discounted from standard industry database data and the observed effects reported by that data. The trip forecasts reflect historical travel patterns, and it is our view that as these were changing pre-Covid-19, and have accelerated as a result of the pandemic, that they are likely to be overestimates of longer distance and less discretional travel.

We wonder whether there is also some confusion over the guidance compliant 'Vision and Validate' approach. The term 'Vision and Validate' is used to differentiate itself from the previously adopted 'Predict and Provide' approach which, as outlined in the TA and our letter dated 14th October 2021, is no longer deemed appropriate for use. This is referenced by the CIHT, TCPA, TRICS, TfN and the DfT. By starting with the policy compliant 'Vision and Validate' approach, the TA is able to make judgements about the 'likely' impacts of development, as required by Paragraph 113 of the NPPF.

For clarity, there has been no trip discounting associated with aspirational modal shift, as has been suggested by LCC Highways.

As noted in the TA, person trip rates have been extracted from the TRICS database for a 12-hour period which have then been split by journey purpose, and then mode splits for each journey purpose. The journey purposes and mode splits have been sourced from the National Travel Survey and Census data, and as such are evidence based. Three distribution patterns have been derived for the different journey purposes which are then combined to provide an overall demand matrix for use in the subsequent modelling.

An allowance has been made for an increased number of people working from home or a Third Place compared with pre-Covid-19. The site design and facilities allow for and encourage this. This is documented in the TA as being 5% and seeks to account in some way for the trend prevalent before the Covid-19 pandemic, but which has now become mainstream for many. In addition, an allowance has been made for a proportion of recreation and leisure trips to be contained within the community, including the site and the surrounding community, those being walking the dog, visiting friends, day to day shopping, other shopping and personal business. This is documented in the TA as being 50%.

Finally, as noted in the TA, the assessment of the applications assumes that there is no school provided on the site and therefore all education trips occur off-site, including car trips. This is likely to be an overestimation. It is only for the full 1,350 masterplan scenario that some account is made for a school being present on site, as noted in the TA.

Combined, these are the only factors applied to the assessment which LCC Highways seem to be referring to as discounting, but which we say are a reasonable expectation of traditional living and have been included in the assessments to account for a likely scenario.

One of the differences between the 'Vision and Validate' and 'Predict and Provide' approaches is an additional step in the mathematical analysis. This step is the reallocation of forecast demand temporally and modally, in addition to the reallocation that many mathematical models already employ in route decision making. These temporal and modal reallocations aren't capable of being undertaken by mathematical models, but do reflect real life, as evidenced and reported on by a variety of reports including Noland (2001), Noland and Lem (2002) and Milam et. al. (2017) to reference but a few.

This additional step element is only triggered following the initial assessment as outlined above, and reflects what many call the fundamental law of traffic (i.e. traffic flow is increasingly a function of the available road space in increasingly congested networks). In such instances, when inconvenience on the network increases, some of the initial unfettered traffic forecast will seek to reallocate itself either by time of travel, not travelling at all or by modal shift. This references real life and is an extrapolation of generalised cost theory which is used in traffic models to allocate traffic to least cost routes but is also a process we all engage with when deciding how and when to travel by particular modes. This is a way of taking account of well understood phenomena such as 'peak spreading' for instance.

This step has not been triggered in the assessments (including the sensitivity assessments presented in Technical Note 03 – Traffic Data and Modelling) to date, as the forecast inconvenience associated with travelling on the network has not reached a point at which we consider this is likely to happen in a substantial way.

We welcome the position of LCC Highways that aspirational modes splits should be encouraged through the Travel Plan and inclusion of a Mobility Hub within the development, and we will seek to explore this further in due course. This would result in lower traffic flow forecasts in the wider area than those applied in the TA for the purpose of those assessments.

Base Data and Trip Rates

LCC Highways and National Highways have queried the use of data collected in April 2021 which has informed the creation of a base model for use in the assessments. To assist in demonstrating that the traffic data is suitable for use, reference should be made to the attached Technical Note 03 -Traffic Data and Modelling. In this note, a comparison of traffic data is presented including:

- 2021 peak hour data v 2018 peak hour data;
- 2021 AADT v 2018/19 AADT to consider trips across the day; and
- 2021 journey time data v 2018/19 journey time data.

The data comparison indicates that general levels of traffic in 2021 were similar to general levels of traffic in 2018. There are however some specific differences.

When considering reasons for the specific differences, there are many, including daily variation, seasonal variation, weather, new infrastructure (i.e. Penwortham Bypass and The Cawsey Link), changing travel habits and potential Covid-19 impacts. There are actually many pre-Covid-19 trends for change (i.e. working from home) which have been accelerated due to Covid-19 and are now likely to form part of the future baseline. As such, it remains our position that just because counts were collected in 2021, this should not render them unsuitable for use when considered as a whole for travel across a 12-hour period and given the purpose of assessment.

We have conducted some further modelling to see how sensitive the network might be to changes in traffic flow. Technical Note 03 - Traffic Data and Modelling presents two sensitivity tests which:

- Increase base flows by 20%; and
- Increase forecast trip demands.

The results indicate that the network is not sensitive to changes in mathematical demand flows of these magnitudes and that the additional 'Vision and Validate' step is still unlikely to be triggered in any substantial way. On that basis the conclusions of the TA remain.

Micro-Simulation Modelling

It has been suggested by LCC Highways that the modelling approach is unacceptable and that individual junction models should be presented as part of the main assessment, which should then be the primary information upon which to form a judgement of development impacts, supplemented by micro-simulation modelling. We do not consider that this is the appropriate or best approach when considering travel across the network and across the whole day. However, we have undertaken the stand-alone traditional commuter peak modelling as suggested by LCC, and this is reported in Technical Note 03 – Traffic Data and Modelling.

There are several key benefits associated with the micro-simulation modelling approach including that the model allows for routing reassignment in response to queueing and congestion. Fundamentally, it allows for an assessment of effect on a corridor basis, cognisant of the effects of interaction between junctions and queue propagation from one junction to another which can affect the operation of the network. Isolated junction modelling cannot capture any impact that upstream network function is inducing and, as such, can provide an oversimplified interpretation of how a network can accommodate traffic flows. One would not expect to rely on individual junction models within this development study area in isolation, as they would not allow for suitable judgements to be made with regards the effect along an entire corridor which, itself, is more important to the overall user experience than the operation of a single junction.

Whilst isolated junction modelling can be useful in terms of understanding the operation of a single junction, in relation to a specific set of traffic flows, we consider that it is actually the case that isolated junction modelling should be seen as complementary to the micro-simulation modelling rather than, as is being suggested, the two being used the other way around. As such, following a series of discussions with LCC Highways, a number of individual junction models and results have been presented in Technical Note 03 – Traffic Data and Modelling to supplement the micro-simulation modelling presented in the TA. As we have consistently noted throughout the TA, although we are happy to assist with the provision of individual junction models, theoretical capacity per se is not a pass/fail trigger for a planning proposal and all results should be viewed in this context.

Although LCC Highways does not comment in any detail regarding the micro-simulation model, we would highlight that the micro-simulation model has been developed in line with standard micro-simulation modelling guidelines with calibration parameters adjusted to ensure that the model reflects the observed data. Signal staging and timings have been sourced from the previous applications, including signal plans and junction models, supplemented by observations recorded on site to confirm their suitability. The base model has been calibrated and validated in line with standard guidelines, to ensure that the model network is reflective of the observed data used in the model build, with a high level of calibration and validation achieved which is documented within the supporting LMVR which is included in the TA.

In addition, we would note that the model has been subject to an independent audit which found it fit for purpose. A copy of the audit report is also included as an appendix within the original TA.

Traffic Distribution
Discussions have been ongoing with LCC Highways regarding the development distribution. As noted in the TA, there are three distribution patterns which have been derived from a range of sources including the location of certain amenities (i.e. schools, retail centres, employment sites) along with Census journey to work data. Information regarding the methodology have been presented to LCC Highways in both the TA and supplementary emails.

Committed Development and Traffic Growth
Committed developments have been included and LCC Highways do not disagree with the sites that have been included. Additional detail regarding the model forecasting process is included in a Model Forecasting Note which is an appendix within the TA.

It is noted in the TA that the inclusion of site-specific committed developments, of which a number are also Local Plan allocations, provides an increase in traffic on the network greater than would be achieved by simply applying a global TEMPro growth factor to the demand matrices. Whilst guidance does note that the use of TEMPRo for traffic forecasts is an appropriate tool, the guidance also highlights that any such approach should be reviewed prior to application to ensure that modelling does not simply reinforce historic travel patterns. The forecasting procedure adopted within the modelling does incorporate a review of TEMPro with the conclusion reached that the adjustments to future year demands are justified.

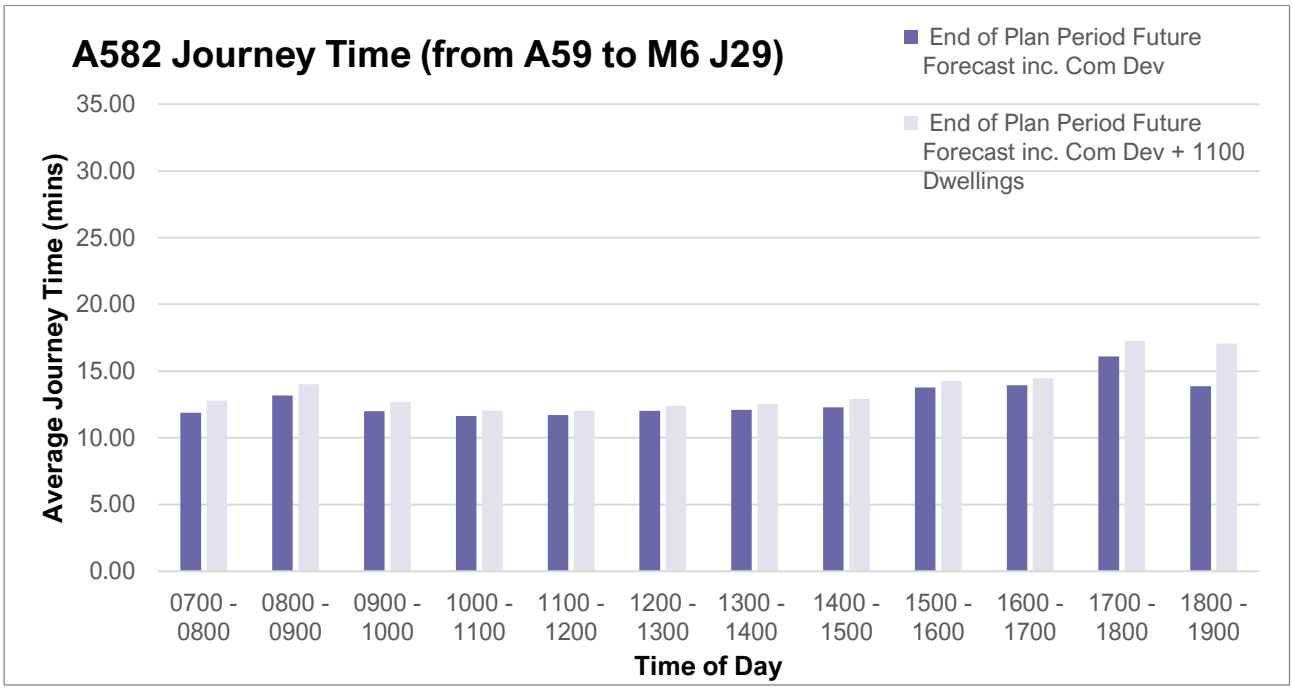
Modelling Results
It has been noted by LCC Highways that the results of the modelling, due to what it considers a flawed modelling approach, are not accepted. Additional information has been requested regarding queue lengths on the network.

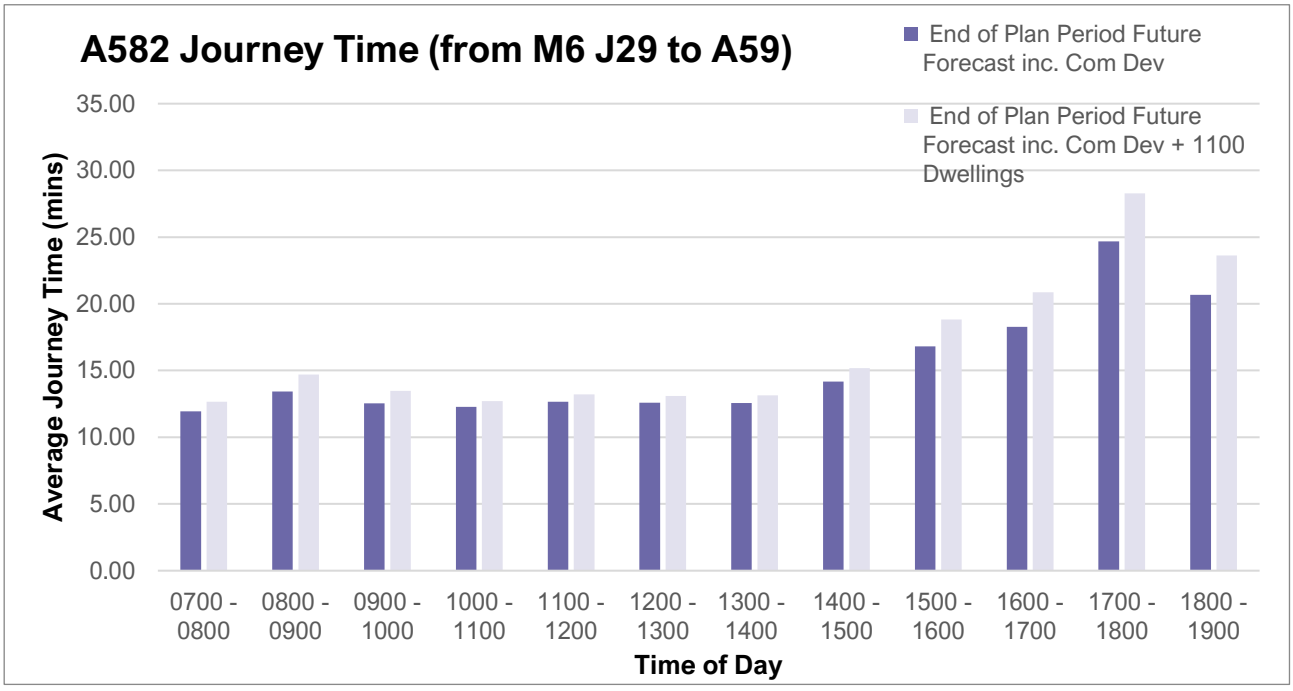
The TA includes the key elements for review, and highlighted that further specific information can be made available on request. Given the request, additional model results for the scenarios presented in the TA are attached within Technical Note 03 – Traffic Data and Modelling.

LCC Highways do question some of the traffic levels reported for certain parts of the network, particularly around the Strategic Road Network. However, it should be noted that the reported traffic flows will account for dynamic traffic rerouting in response to increases in congestion and inconvenience on the network. As such, it is not correct to simply assume that if traffic flows reduce on a certain part of the network that this demonstrates a flaw. In fact, this is where the use of micro-simulation as a more sophisticated traffic modelling tool allows for a more informed judgement to me made rather than relying on individual junction models.

Further Comments and Thoughts
In LCC Highways' concluding remarks, it notes that there are several pinch points on the network where queueing extends for several hundred metres. This points to the fact that, in providing comments, the focus remains solely on the historic commuter peak period, and we note that a reasonable interpretation of policy is that it is not to protect the convenience of the car commuter.

We expect that there will be pinch points on the network and that there will be queuing, some of which might increase at times of the day. However, the modelling which informs the TA makes forecasts of the everyday tangible metric of journey times which allows us to look at movement and the convenience of movement in the context of the whole day. A summary of average journey times per hour, for the through route along the A582 are included below.





These graphs show the mathematical results before making any judgements about a redistribution of unfettered demand either by time, mode or lifestyle change that would follow under a 'Vision and Validate' approach.

Convenience of vehicle movement across the day are relatively consistent in both directions with little variation. The variation is only evident for short periods and in the traditional commuter peak hours, in this case in the evening, when congestion and inconvenience increases. For the through route corridor between the A59 and the M6 Junction 29, a typical journey time southbound is in the order of 16-17 minutes without development, and 17-18 minutes with the development. For the northbound movement this is 24-25 minutes without development, and 28-29 minutes with the development. There is inevitably an increase in typical journey time as a result of accessing this allocated site from the A582 as it introduces a new signal-controlled junction to the network.

When considering this in the context of journey purposes across the day, the NTS identifies that business trips (which are often viewed as contributing most to the overall economy) are most prevalent between 0900-1700hrs and less so in the times at which general convenience of travelling by road is least. Placing this in context, based on NTS data, business trips between 0700 and 1700, where convenience is broadly flat, makes up about 78% of daily business trips, and business trips at the time where inconvenience peaks, although still at a low level between 1700 and 1900, makes up about 11% of daily business trips.

Other Comments

The purpose of the planning system is to contribute to the achievement of sustainable development, and there are three strands to this set out in the NPPF; economy, social and environmental.

The social, environmental and economic credentials and benefits of development of this site have already been determined by its allocation in the Local Plan. The design of this site, as explained in the planning applications and above, accentuates those social and environmental benefits, and reinforces the conclusion that this is the best location and way in which to deliver this growth.

In the context of the principle that the purpose of planning policy is to deliver sustainable development, and it is specifically not the purpose of planning policy to protect the convenience of the car commuter, the modelling work leads reasonably to a conclusion that there is no substantial disbenefit as a result of either including an additional junction on the network, or the additional traffic demands on the transport networks.

Through regular communications with LCC Highways, National Highways and Network Rail, we have sought to continue our discussions regarding the development proposals which started prior to the submission of the applications. Where requests for additional information or clarity have been expressed either in writing or during the various meetings, we have sought to understand the purpose of these requests and have then assisted with the provision of information in an expedient manner.

Whilst there are still some discussions ongoing with LCC Highways and National Highways regarding the comments made to date, we do hope that the information contained within this letter, and associated technical attachments, will assist in allowing SRBC to positively determine the planning applications. However, should you have any comments, questions or queries at this time, please do not hesitate to contact us and we look forward to speaking with you further at our next meeting in the coming week.

Yours sincerely

Paul Whitaker
Associate
For and on behalf of Vectos (North) Ltd

T: 0161 228 1008 M: 07498 303 564
paul.whitaker@vectos.co.uk

Enc. Technical Note 03 – Traffic Data and Modelling
Technical Note 04 – Bee Lane