HighgateTransportation

Land at Peel Hall, Warrington
Reopened Inquiry

Rebuttal Proof of Evidence
on Highway and Transportation Matters

Part A - Following Submission of Rule 6 Party Evidence

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on behalf of
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(APP/M0655/W/17/3178530)

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Rebuttal Proof of Evidence on Highway and Transport Matters Following Submission of Rule 6 Party Evidence

1.0 Introduction

1.1 My name is David Tighe, I am a Director of Highgate Transportation and my qualifications and experience are set out in my main proof of evidence.

1.2 This rebuttal proof of evidence relates to highway and transportation matters has been prepared following the receipt of the Rule 6 party proofs of evidence. Highway matters are mainly covered by Mr Parr in his Volume 1 Transport proof of evidence and to a lesser extent by Mr Sullivan in his Volume 4 Air Quality proof of evidence.

1.3 The approach of the Rule 6 party evidence seems to have resulted in a misunderstanding as to the function of the strategic modelling that has taken place to support the Peel Hall development in agreement with the Council. Essentially, this modelling is based on the Council's WMMTM16 whereas the Rule 6 party's misunderstanding appears to be that it was based on surveys carried out in 2019. It should be noted that the surveys carried out before Easter 2019 were only carried out for checking purposes and were not directly inputted to the WMMTM16. This is considered in more detail at **paragraph 3.3** below.

2.0 Rule 6 Air Quality Proof of Evidence (so far as it relates to highway matters) – Mr Sullivan

2.1 I comment on the highway matters raised by Mr Sullivan in his evidence as follows.

Section 1 paragraph 1.2(a)

2.2 Mr Sullivan suggests that the road traffic model that underpins the air quality model is based on inadequate monitoring.

2.3 However, the traffic modelling is agreed with the Council, in conjunction with Highways England, using a cordon of the Council's WMMTM16 carried out by the Council's own modelling consultants. Traffic monitoring (i.e. surveys) is discussed in **paragraph 3.3** below.

Section 1 paragraph 1.2 (d)

2.4 Mr Sullivan comments that the traffic modelling excludes site traffic.

2.5 This is a phased development which will be built out over a 10 year period and as a result construction traffic is spread out and is very low compared to development traffic. Therefore, in terms of traffic impact there is no requirement to account for specific construction site traffic in the transport assessment modelling work. Where it is considered is within the 2020 ES at chapter 9, paragraphs 9.5.3 to 9.5.8. A Construction Management Plan is expected to be secured by a planning condition.

2.6 This approach is also reflected in the agreed trip rates from 2016, which do not specifically account for construction traffic. This mirrors the approach within thew Transport Assessments provided to support other (now committed) residential developments in the borough.

Section 2 paragraph (b)

2.7 Mr Sullivan again suggests that the modelling carried out by Miller Goodall is based on inadequate traffic modelling.

2.8 However, as with **paragraph 2.3** above, the traffic modelling is agreed with the Council, in conjunction with Highways England, using a cordon of the Council's WMMTM16 carried out by the Council's own modelling consultants.

Section 5 paragraph 5.5(b)

2.9 Mr Sullivan suggests that the development will be car dependant.

2.10 However, the development will have onsite facilities including a local centre and will have a bus-service serving the site and be supported by a Travel Plan and associated measures such as travel vouchers to encourage bus use. Future residents can also walk and cycle to the town centre and to areas of employment such as Birchwood. Rail stations are also accessible by bus and cycle.

2.11 It should be noted that paragraph 4.1.6 of the Statement of Common Ground on Planning Matters (regarding paragraphs 7-10 of the NPPF) confirms that "*it is agreed by the Council and the Appellant, though not by the Rule 6 Party that the proposals comprise sustainable development…*".

Section 6

2.12 Mr Sullivan again suggests that the site is not sustainably located, would be car dependant and there would be little uptake in sustainable modes such as bus and cycle and as a result there would be more trips by car.

2.13 As set out in **paragraphs 2.10** and **2.11** above, the site is agreed to be sustainably located and is supported by sustainable travel measures. It should also be noted that whilst the appelants strategy for development at Peel Hall includes for bus mitigation measures to improve accessibility, the use of buses is not discounted for in the traffic modelling.

2.14 In paragraph 6.5, Mr Sullivan refers to the 2,000sqm retail facility. This is the local centre and would typically require only one or two HGV visits per day.

Section 9 paragraphs 9.1-9.4

2.15 Mr Sullivan sets out that the assumptions underpinning the traffic model are not stated, and that the apparent reduction in HDV journeys (AADT) between 2019 and 2022 is a good reason to question the traffic data.

2.16 However, the traffic data and traffic growth assumptions are from the Council's WMMTM16.

2.17 The HDV figures (AM and PM peak hour) are shown to be fairly static in the modelling or marginally reduce. This could easily be the result of rounding through the spreadsheets and datasets. See the spreadsheet that this Table A12.4.1 originated from in **Appendix DT/A**.

2.18 HDVs include buses, which have reduced in number through this area since 2016, although this is unlikely to be the reason for the minor discrepancies.

2.19 The minor reductions, where not rounding margins resulting from taking peak hour flows and converting to AADT, are most likely to be due to the SATURN modelling and the congested network i.e. changing where the vehicles are assigned.

3.0 Rule 6 Transport Proof of Evidence – Mr Parr

3.1 I comment on the highway matters raised by Mr Parr in his evidence as follows:

Section 3 paragraph 3.2

3.2 Mr Parr suggests that the 30th March to 5th April 2019 traffic surveys were used to feed into the WMMTM16 model.

3.3 However, the surveys referred to are check surveys that carried out before the Easter holidays and were not directly input to the WMMTM16 cordon model for Peel Hall. This is confirmed in the correspondence between the Rule 6 party and the Council's highway witness Mr Taylor at **Appendix DT/B**.

Section 3 paragraph 3.5

3.4 Mr Parr suggests that what is set out at paragraph 1.27 of our Transport Assessment Addendum (March 2020) is a list of 'surveys' which were undertaken on a single day.

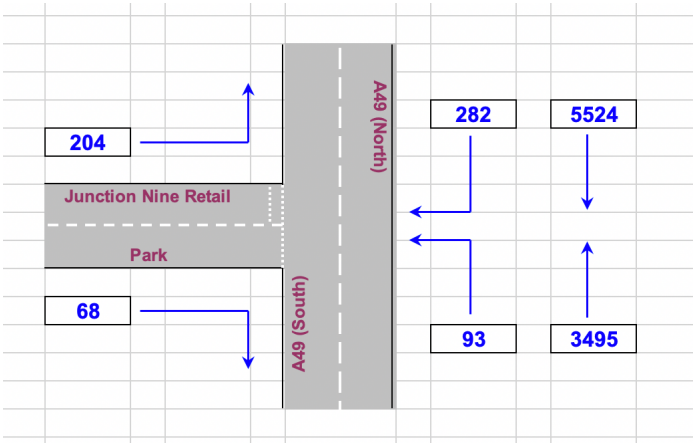
3.5 However, it appears that he has misunderstood this list, which was not related to traffic survey counts but junctions to be considered in more detail following the results of the Peel Hall WMMTM16 cordon modelling as agreed with the Council.

Section 3 paragraph 3.7

3.6 Mr Parr suggests that the A49 has been incorrectly designated in the JunctionNINE retail park traffic surveys.

3.7 This appears to be a misunderstanding of the presentation of the data. The A49 North is the A49 northern arm, which is surveying all the traffic on the A49 heading southbound or turning right to the retail park (it is also a destination); the A49 South is surveying all the traffic heading northbound or turning left to the retail park (it is also a destination). See **Figure 1** below.

Figure 1 – Survey data example



Section 4

3.8 In criticising the appellant's proposed bus measures, Mr Parr is suggesting that they would be unattractive and ineffective in reducing car travel. The cycle friendly measures we suggest through the area to the south are also criticised as being ineffective and that whilst there may be appropriate measures within the appeal site, there are no meaningful measures proposed or existing off site.

3.9 This subject is touched upon in the air quality proof - see paragraphs 2.10 and 2.12 above.

3.10 It is for this development to provide pedestrian and cycle facilities within the site and it should be noted that, where appropriate, off-site proposals include enhancements to pedestrian and cycle infrastructure such as the proposed A50/Hilden Road mitigation where a new zebra crossing is proposed and the Poplars Avenue (central) site access where a signal crossing is proposed.

3.11 It should also be noted that the Council's LTP4 promotes walking, bus and cycle measures throughout the wider area.

3.12 Furthermore, the traffic modelling did not allow for any discounting of vehicle trips to take account of the appellant's public transport strategy.

Section 5

3.13 In this Section Mr Parr criticises the appellant's bus strategy and sets out why he considers it is highly unlikely that it will have any impact on reducing car travel.

3.14 It should be noted that Mr Parr refers to the January 2018 ES chapter (9.4) regarding bus timetables. However, this was updated in the March 2020 ES chapter (9.4) and confirms the timetable available earlier this year i.e. pre-Covid19.

3.15 It is considered that the proposed bus strategy has been misunderstood. The existing services (25 to the east and 20 and/or 21 to the south) will only extend partially into the site and are not expected to travel through the site between Mill Lane and Poplars Avenue. This reflects what has been agreed with Warrington's Own Buses and the Council's public transport team.

3.16 The development will provide future residents with the opportunity to reduce car travel via bus service funding and travel plan measures.

Section 6 paragraph 6.8(vi)

3.17 Mr Parr is concerned that the existing zebra crossing on Poplars Avenue will be removed in order to create the proposed site access.

3.18 However, he misunderstands the proposal because the existing zebra crossing is being replaced with a signal-controlled crossing to the east and an additional uncontrolled crossing with pedestrian refuge island to the west. This is shown on plan HTp/1107/12/Q provided in Appendix DT/2 of my main proof of evidence.

3.19 It should be noted that all the proposed site accesses were subject to independent Road Safety Audits.

Section 6 paragraph 6.8(xv)

3.20 Mr Parr refers to the previously proposed signalisation of the Enfield Park Road and Crab Lane priority junction.

3.21 It should be noted that a proposal for mitigation at the Crab Lane junction with Enfield Park Road was in front of the 2018 inquiry. However, the subsequent WMMTM16 modelling, as confirmed with the Council, has demonstrated that mitigation is not now required at this junction as a result of the Peel Hall development traffic.

Section 7 – Birch Avenue access (Appendix 8)

3.22 Mr Parr provides comments and annotations on the proposed site access arrangement plan for Birch Avenue. One of the annotations suggests that Birch Avenue is at serious risk of becoming a rat-run when the A49 is congested.

3.23 Birch Avenue is currently a cul-de-sac and will remain a cul-de-sac albeit with an additional 20 dwellings (15 off one access, directly west of The Alders, and five off a small shared surface access arrangement to the south of The Alders as an extension to Birch Avenue). There is no proposal to provide access to the larger Peel Hall site off Birch Avenue. Therefore, there is no prospect of Birch Avenue becoming a rat-run irrespective of the A49 being congested or not.

3.24 Also, it should be noted that the proposed parking for 15 cars has always been intended for the existing residents of Birch Avenue. The new dwellings on the appeal site would have their own parking provision which will be in line with the Council's standards and be subject to a reserved matters application.

Section 7 – Poplars Avenue (west) access (Appendix 9)

3.25 Mr Parr provides a critique of the proposed Poplars Avenue (west) access arrangement, particularly in regard to verge widths, alignment and visibility due to on-street parked cars.

3.26 It should be noted that an access junction such as this is for agreement in principle at this stage and will be subject to modification at the detailed design stage. Furthermore, car parking is shown to be removed to Poplars Avenue verge and the alignment of the access road is consistent with a 20mph design speed.

Section 7 – Mill Lane access (Appendix 11)

3.27 Mr Parr provides a critique of the proposed Mill Lane extension access arrangement for 150 dwellings, and in particular the width of existing footway on Mill Lane.

3.28 This access extension has been subject to two Inspector reports that confirmed the existing Mill Lane infrastructure is suitable to provide access for a further 150 dwellings.

Appendix DT/A

Traffic Data Table

Link Name	2018 Base Year/Verification										2022 Opening Year Without Development									
	AM Flow			PM Flow			AM + PM		AADT_24	HDV%	AM Flow			PM Flow			AM + PM		AADT_24	HDV%
	LV	HDV	Total	LV	HDV	Total	HDV	Total			LV	HDV	Total	LV	HDV	Total	HDV	Total		
A49 Northbound (JunctionNINE Retail Park - Hawleys Lane)	1082	88	1169	1779	53	1832	140	3001	21086	5%	1148	87	1235	1883	53	1935	140	3171	22278	4%
A49 Northbound (M62 - Birch Avenue)	1206	90	1296	1737	53	1790	142	3086	21679	5%	1279	89	1368	1780	52	1832	142	3200	22485	4%
A49 Northbound (north of M62)	1237	72	1309	1880	62	1942	134	3251	22840	4%	1312	72	1383	1986	62	2047	133	3430	24102	4%
A49 Northbound (parallel to Brendon Avenue - Sandy Lane West)	1206	90	1296	1737	53	1790	142	3086	21679	5%	1279	89	1368	1780	52	1832	142	3200	22485	4%
A49 Northbound (Sandy Lane West - JunctionNINE Retail Park)	1120	88	1208	1823	53	1876	141	3084	21669	5%	1183	87	1271	1922	53	1975	140	3246	22806	4%
A49 South of A50 (Northbound)	884	67	951	1373	37	1411	104	2361	16591	4%	940	66	1007	1456	37	1493	104	2500	17563	4%
A49 South of A50 (Southbound)	1404	50	1454	1393	44	1437	94	2891	20312	3%	1493	50	1543	1477	44	1521	94	3063	21522	3%
A49 Southbound (JunctionNINE Retail Park - Hawleys Lane)	1688	50	1737	1598	56	1654	106	3391	23826	3%	1701	48	1748	1607	55	1662	103	3410	23960	3%
A49 Southbound (M62 - Birch Avenue)	1604	55	1659	1599	69	1668	125	3327	23376	4%	1658	55	1713	1700	69	1769	124	3482	24466	4%
A49 Southbound (north of M62)	1639	72	1710	1325	51	1376	123	3086	21685	4%	1696	71	1767	1390	51	1441	122	3208	22540	4%
A49 Southbound (parallel to Brendon Avenue - Sandy Lane West)	1604	55	1659	1599	69	1668	125	3327	23376	4%	1658	55	1713	1700	69	1769	124	3482	24466	4%
A49 Southbound (Sandy Lane West - JunctionNINE Retail Park)	1732	50	1782	1501	54	1555	104	3337	23445	3%	1742	48	1790	1508	54	1562	102	3352	23551	3%
A49 Winwick Link Road	1169	89	1258	1719	74	1792	162	3050	21431	5%	1244	88	1333	1821	73	1894	161	3227	22672	5%
A50 Long Lane	1054	21	1076	1007	28	1035	49	2111	11975	2%	1044	20	1064	1091	28	1119	48	2182	12379	2%
A50 Orford Green	899	28	927	980	22	1002	50	1929	10940	3%	872	28	900	1036	22	1058	50	1958	11106	3%
A50 School Road	947	31	978	962	34	996	65	1974	11200	3%	924	29	953	1045	33	1078	62	2031	11520	3%
Birch Avenue (Site entrance)	21	0	21	13	0	14	0	35	191	1%	22	0	22	14	0	14	0	37	203	1%
Blackbrook Avenue (Ballater Dr - Capesthorne Rd)	745	3	748	693	2	695	6	1443	6472	0%	845	3	849	719	2	721	6	1570	7039	0%
Blackbrook Avenue (Capesthorne Rd - Insall Rd)	724	5	729	704	4	707	9	1437	6442	1%	767	5	772	765	4	769	9	1541	6909	1%
Capesthorne Road (Greenwood Crescent to Blackbrook Avenue)	734	16	750	681	25	706	41	1456	6529	3%	831	16	848	756	25	782	42	1629	7306	3%
Capesthorne Road (Poplars Ave towards School Lane/A50)	346	7	353	162	5	167	12	520	2332	2%	389	6	395	149	5	154	11	549	2463	2%
Capesthorne Road (Poplars Ave - parallel to Humber Road)	438	4	442	536	13	549	17	992	4446	2%	492	4	496	604	13	617	17	1113	4992	2%
Cleveland Road	200	1	202	336	1	336	2	538	2965	0%	315	1	316	374	1	375	2	691	3810	0%
Cotswold Road	25	13	38	21	12	33	25	71	392	35%	27	13	40	24	12	36	25	76	417	33%
Cromwell Avenue	1925	40	1965	2144	50	2193	89	4158	29214	2%	2047	39	2086	2198	49	2247	89	4333	30445	2%
Delph Lane (Mill Lane - Myddleton Lane)	793	4	797	796	4	799	8	1597	6626	0%	897	4	902	822	4	826	8	1727	7169	0%
Elm Road	49	4	53	54	0	54	4	107	592	4%	52	4	56	57	0	57	4	113	624	4%
Fisher Avenue	97	5	102	159	8	167	13	269	1483	5%	118	5	123	199	8	207	13	330	1820	4%
Golbourne Road	1237	16	1254	1115	14	1129	31	2383	9889	1%	1273	16	1289	1147	14	1161	31	2450	10168	1%
Grasmere Avenue (Site entrance)	0	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	0	0%
Grasmere Avenue	118	0	118	150	0	150	0	268	1476	0%	125	0	125	158	0	158	0	283	1558	0%
Greenwood Crescent (Darley Ave to Grasmere Ave)	248	9	257	0	8	8	18	265	1463	7%	288	9	297	0	8	8	18	305	1683	6%
Greenwood Crescent (Grasmere Ave to Meteor Cres)	420	10	430	71	8	79	18	510	2811	4%	471	10	481	76	8	84	18	565	3116	3%
Hawleys Lane	932	52	983	914	54	968	106	1951	13707	5%	990	51	1041	956	53	1009	105	2050	14405	5%
Howson Road	39	0	39	37	0	37	0	76	421	0%	43	0	43	39	0	39	0	82	452	0%
M62 Eastbound J8 - J9	3651	268	3919	4607	261	4867	528	8786	53114	6%	3882	266	4148	4883	259	5142	526	9290	56160	6%
M62 Eastbound J9 - J10 (east of Mill Lane)	2155	191	2346	2441	162	2603	352	4949	29917	7%	2290	190	2479	2586	161	2747	351	5226	31592	7%
M62 Eastbound J9 - J10 (west of Mill Lane)	3565	314	3879	4039	241	4281	555	8160	49325	7%	3791	312	4103	4282	240	4522	552	8625	52136	6%
M62 Junction 9 Eastbound Entry Slip	757	73	830	371	26	396	99	1227	7416	8%	807	73	879	393	26	419	98	1298	7845	8%
M62 Junction 9 Eastbound Off Slip	843	27	871	938	45	983	72	1854	11205	4%	898	27	924	994	45	1039	72	1963	11869	4%
M62 Junction 9 Westbound Entry Slip	641	39	681	740	33	773	73	1454	8789	5%	684	39	723	786	33	819	72	1542	9318	5%
M62 Junction 9 Westbound Off Slip	585	72	657	426	66	492	138	1149	6946	12%	623	71	694	453	66	519	137	1213	7331	11%
M62 Westbound J8 - J9	3844	570	4414	5086	361	5446	931	9860	59604	9%	4092	567	4659	5399	359	5758	926	10417	62970	9%
M62 Westbound J9 - J10 (east of Mill Lane)	3787	602	4390	4772	394	5166	996	9555	57761	10%	4031	599	4630	5066	392	5458	991	10088	60983	10%
M62 Westbound J9 - J10 (west of Mill Lane)	3787	602	4390	4772	394	5166	996	9555	57761	10%	4031	599	4630	5066	392	5458	991	10088	60983	10%
Mill Lane (Ballater Dr - new roundabout)	794	4	798	792	4	796	8	1594	7147	0%	898	4	902	819	4	823	8	1725	7734	0%
Mill Lane (Delph Lane - underneath the M62)	793	4	797	796	4	799	8	1597	6626	0%	897	4	902	822	4	826	8	1727	7169	0%
Mill Lane (Mill Lane turn off - new roundabout)	791	4	795	792	4	795	8	1590	6599	0%	895	4	899	818	4	822	8	1720	7140	0%
Mill Lane (Site entrance)	23	1	24	28	0	28	1	52	216	2%	24	1	25	29	0	29	1	54	224	2%
Mill Lane/Blackbrook Avenue (New roundabout)	0	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	0	0%
Myddleton Lane (Delph Lane to underneath A49)	1095	8	1102	1270	6	1276	14	2379	9871	1%	1193	8	1200	1313	6	1319	14	2520	10456	1%
Myddleton Lane (Waterworks Lane to Golbourne Road)	1004	9	1013	1068	6	1073	15	2086	8658	1%	1091	9	1100	1096	6	1102	15	2202	9140	1%
Newton Road	1095	56	1150	1231	31	1262	86	2412	10010	4%	1163	56	1219	1305	31	1335	86	2554	10600	3%
Northway NB	194	2	197	71	1	71	3	268	1478	1%	188	3	191	155	1	156	4	347	1913	1%
Northway SB	114	9	123	93	6	99	15	221	1220	7%	121	9	130	99	6	105	15	236	1299	6%
Poplars Avenue - East of (Central) Site entrance	249	14	263	388	20	408	34	671	3702	5%	369	14	383	432	20	452	34	835	4602	4%
Poplars Avenue - West of (Central) Site entrance	207	14	221	323	19	342	33	563	3103	6%	322	14	336	362	19	381	33	718	3957	5%
Poplars Avenue (Central) (Site entrance)	0	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	0	0%
Poplars Avenue (Greenwood Cres - Capesthorne Road)	617	17	634	916	31	947	48	1581	8716	3%	736	18	754	1018	31	1049	49	1802	9937	3%
Poplars Avenue (south of Capesthorne Road)	598	17	615	650	20	670	37	1284	7082	3%	721	19	740	676	21	697	40	1437	7922	3%
Poplars Avenue (West) (Site entrance)	0	0	0	0	0	0	0	0	0	0%	0	0	0	0	0	0	0	0	0	0%
Radley Lane	14	1	15	13	0	13	1	28	114	4%	15	1	16	14	0	14	1	30	125	3%
Sandy Lane	300	17	317	417	25	442	42	759	4184	6%	312	18	330	474	25	499	43	829	4571	5%
Sandy Lane West	447	6	452	675	7	683	13	1135	6255	1%	571	7	578	767	7	774	14	1352	7454	1%
Statham Avenue	318	6	324	360	13	373	19	697	3841	3%	338	7	345	409	13	422	20	766	4225	3%
Windermere Avenue (Grasmere Ave to Poplars Ave)	0	0	0	16	1	17	1	17	94	6%	0	0	0	17	1	18	1	18	100	5%
M62/A49 J9 Roundabout - 85824 to 85823 (down)	1493	64	1557	1597	56	1653	119	3209	19401	4%	1552	63	1615	1696	55	1751	119	3366	20349	4%
M62/A49 J9 Roundabout - 85823 to 85822 (<)	491	80	571	416	52	468	132	1039	6282	13%	535	79	614	439	52	491	131	1105	6680	12%
M62/A49 J9 Roundabout - 85822 to 85821 (^)	1056	130	1187	1413	72	1484	202	2671	16145	8%	1130	129	1260	1433	71	1504	201	2764	16707	7%
M62/A49 J9 Roundabout - 85821 to 85824 (>)	730	43	773	649	23	672	66	1445	8735	5%	777	43	820	704	22	727	65	1547	9351	4%

Link Name	2022 Opening Year With Development										2022 Development / No Development Difference						Typical Velocity (Kmph)
	AM Flow			PM Flow			AM + PM		AADT_24	HDV%	AM Flow			PM Flow			
	LV	HDV	Total	LV	HDV	Total	HDV	Total			LV	HDV	Total	LV	HDV	Total	
A49 Northbound (JunctionNINE Retail Park - Hawleys Lane)	1175	87	1262	1922	53	1975	140	3237	22744	4%	27	0	27	39	0	39	
A49 Northbound (M62 - Birch Avenue)	1312	89	1401	1798	52	1850	142	3251	22843	4%	33	0	33	18	0	18	
A49 Northbound (north of M62)	1328	72	1400	2016	62	2077	133	3478	24433	4%	17	0	17	30	0	30	
A49 Northbound (parallel to Brendon Avenue - Sandy Lane West)	1312	89	1401	1798	52	1850	142	3251	22843	4%	33	0	33	18	0	18	
A49 Northbound (Sandy Lane West - JunctionNINE Retail Park)	1207	88	1295	1964	53	2017	140	3312	23271	4%	24	0	24	42	0	42	46.2*
A49 South of A50 (Northbound)	965	66	1032	1540	37	1577	104	2609	18328	4%	25	0	25	84	0	84	
A49 South of A50 (Southbound)	1572	50	1622	1542	44	1586	94	3208	22540	3%	79	0	79	66	0	66	
A49 Southbound (JunctionNINE Retail Park - Hawleys Lane)	1688	47	1735	1629	56	1685	103	3420	24032	3%	-13	0	-13	23	1	23	
A49 Southbound (M62 - Birch Avenue)	1672	62	1733	1717	69	1786	131	3519	24727	4%	14	7	20	17	0	17	
A49 Southbound (north of M62)	1740	71	1812	1388	51	1439	122	3251	22838	4%	44	0	44	-2	0	-2	
A49 Southbound (parallel to Brendon Avenue - Sandy Lane West)	1672	62	1733	1717	69	1786	131	3519	24727	4%	14	7	20	17	0	17	
A49 Southbound (Sandy Lane West - JunctionNINE Retail Park)	1733	47	1780	1527	54	1582	102	3362	23620	3%	-9	0	-10	19	1	20	34.1*
A49 Winwick Link Road	1254	88	1342	1834	73	1907	161	3249	22829	5%	9	0	9	13	0	13	
A50 Long Lane	1024	20	1044	1133	28	1161	48	2205	12505	2%	-20	0	-20	42	0	42	41.8
A50 Orford Green	999	27	1026	1082	21	1104	48	2130	12081	2%	127	-1	126	46	0	46	
A50 School Road	939	30	969	1054	33	1087	63	2057	11668	3%	16	1	17	9	0	9	
Birch Avenue (Site entrance)	38	0	38	30	0	31	0	69	380	0%	16	0	16	16	0	16	22.7
Blackbrook Avenue (Ballater Dr - Capesthorne Rd)	1371	3	1374	1234	2	1237	6	2611	11707	0%	526	0	525	516	0	516	
Blackbrook Avenue (Capesthorne Rd - Insall Rd)	1058	6	1064	1116	4	1120	10	2184	9794	0%	291	1	292	351	0	351	
Capesthorne Road (Greenwood Crescent to Blackbrook Avenue)	1169	16	1185	1149	26	1174	42	2360	10581	2%	338	0	338	392	0	393	
Capesthorne Road (Poplars Ave towards School Lane/A50)	447	7	454	210	5	215	12	669	3002	2%	58	1	59	61	0	61	
Capesthorne Road (Poplars Ave - parallel to Humber Road)	776	4	780	983	13	997	18	1777	7966	1%	284	0	284	380	0	380	
Cleveland Road	428	1	429	463	1	463	2	893	4922	0%	113	0	113	88	0	88	
Cotswold Road	71	13	83	74	12	86	25	169	933	15%	44	0	44	50	0	50	
Cromwell Avenue	2144	46	2190	2258	49	2308	95	4498	31601	2%	97	7	104	61	0	61	
Delph Lane (Mill Lane - Myddleton Lane)	1001	4	1005	911	4	915	8	1920	7966	0%	103	0	103	89	0	89	
Elm Road	52	4	56	57	0	57	4	113	624	4%	0	0	0	0	0	0	
Fisher Avenue	213	5	218	248	8	256	13	473	2610	3%	95	0	95	49	0	49	
Golbourne Road	1335	16	1352	1171	14	1185	30	2537	10528	1%	63	0	63	24	0	24	
Grasmere Avenue (Site entrance)	15	0	15	15	0	15	0	30	165	0%	15	0	15	15	0	15	28.0
Grasmere Avenue	128	0	128	162	0	162	0	290	1599	0%	3	0	3	4	0	4	
Greenwood Crescent (Darley Ave to Grasmere Ave)	339	9	349	6	8	14	18	363	2002	5%	52	0	52	6	0	6	
Greenwood Crescent (Grasmere Ave to Meteor Cres)	502	10	511	76	8	84	17	595	3282	3%	30	-1	30	1	0	1	
Hawleys Lane	1011	51	1063	976	53	1030	104	2092	14700	5%	22	0	22	20	0	20	38.8
Howson Road	62	0	62	65	0	65	0	127	892	0%	19	0	19	26	0	26	
M62 Eastbound J8 - J9	3905	266	4172	4897	259	5157	526	9328	56390	6%	24	0	24	14	0	14	
M62 Eastbound J9 - J10 (east of Mill Lane)	2308	190	2498	2586	161	2747	351	5245	31705	7%	19	0	19	0	0	0	
M62 Eastbound J9 - J10 (west of Mill Lane)	3823	312	4135	4282	240	4522	552	8657	52333	6%	33	0	33	0	0	0	
M62 Junction 9 Eastbound Entry Slip	839	73	912	393	26	419	98	1330	8042	7%	33	0	33	0	0	0	
M62 Junction 9 Eastbound Off Slip	921	27	948	1008	45	1053	72	2001	12099	4%	24	0	24	14	0	14	
M62 Junction 9 Westbound Entry Slip	709	39	748	795	33	828	72	1577	9530	5%	26	0	26	9	0	9	
M62 Junction 9 Westbound Off Slip	627	71	699	464	66	529	137	1228	7424	11%	5	0	5	11	0	11	
M62 Westbound J8 - J9	4117	567	4685	5408	359	5767	926	10452	63182	9%	26	0	26	9	0	9	
M62 Westbound J9 - J10 (east of Mill Lane)	4035	599	4635	5077	392	5469	991	10103	61075	10%	5	0	5	11	0	11	
M62 Westbound J9 - J10 (west of Mill Lane)	4035	599	4635	5077	392	5469	991	10103	61075	10%	5	0	5	11	0	11	
Mill Lane (Ballater Dr - new roundabout)	1510	4	1514	1460	4	1463	8	2977	13350	0%	612	0	612	641	0	641	
Mill Lane (Delph Lane - underneath the M62)	1001	4	1005	911	4	915	8	1920	7966	0%	103	0	103	89	0	89	63.5
Mill Lane (Mill Lane turn off - new roundabout)	1075	4	1079	1001	4	1004	8	2083	8646	0%	181	0	180	183	0	183	
Mill Lane (Site entrance)	103	1	104	75	0	75	1	179	743	1%	79	0	79	46	0	46	31.3
Mill Lane/Blackbrook Avenue (New roundabout)	621	0	621	586	0	586	0	1207	5412	0%	621	0	621	586	0	586	
Myddleton Lane (Delph Lane to underneath A49)	1293	8	1301	1346	6	1352	13	2653	11009	1%	100	0	100	33	0	33	
Myddleton Lane (Waterworks Lane to Golbourne Road)	1186	9	1195	1119	6	1125	15	2320	9628	1%	95	0	95	23	0	23	
Newton Road	1179	56	1235	1319	31	1350	86	2585	10726	3%	16	0	16	15	0	15	
Northway NB	173	3	176	153	1	153	4	330	1818	1%	-15	0	-15	-2	-1	-3	
Northway SB	173	9	182	124	6	130	15	311	1716	5%	51	0	51	24	0	24	
Poplars Avenue - East of (Central) Site entrance	629	14	644	693	20	713	34	1357	7481	3%	261	0	261	262	0	262	44.7
Poplars Avenue - West of (Central) Site entrance	505	14	519	522	19	541	33	1060	5845	3%	183	0	183	160	0	160	
Poplars Avenue (Central) (Site entrance)	149	0	149	198	0	198	0	347	1913	0%	149	0	149	198	0	198	
Poplars Avenue (Greenwood Cres - Capesthorne Road)	1028	18	1046	1365	31	1396	49	2442	13464	2%	293	0	293	347	0	347	
Poplars Avenue (south of Capesthorne Road)	903	18	921	748	21	769	39	1690	9318	2%	182	-1	181	72	0	72	37.5
Poplars Avenue (West) (Site entrance)	113	0	113	120	0	120	0	233	1285	0%	113	0	113	120	0	120	
Radley Lane	15	1	16	14	0	14	1	30	125	3%	0	0	0	0	0	0	
Sandy Lane	353	18	371	563	25	588	43	959	5289	5%	41	0	41	89	0	89	
Sandy Lane West	738	7	745	970	7	977	14	1722	9493	1%	167	0	167	203	0	203	
Statham Avenue	437	7	444	527	13	540	20	984	5426	2%	99	0	99	119	0	119	
Windermere Avenue (Grasmere Ave to Poplars Ave)	30	1	31	28	1	29	2	60	329	3%	30	1	31	11	0	11	
M62/A49 J9 Roundabout - 85824 to 85823 (down)	1576	63	1639	1706	55	1761	119	3400	20555	3%	24	0	24	10	0	10	
M62/A49 J9 Roundabout - 85823 to 85822 (<)	556	73	629	439	52	491	125	1119	6766	11%	21	-7	14	0	0	0	
M62/A49 J9 Roundabout - 85822 to 85821 (^)	1158	123	1281	1442	71	1513	194	2794	16889	7%	28	-6	21	9	0	9	
M62/A49 J9 Roundabout - 85821 to 85824 (>)	789	43	832	720	23	742	66	1575	9518	4%	12	0	12	15	0	15	

A49	14.052
A50	11.345
Poplars Avenue	11.027
Blackbrook Avenue	8.968
Delph Lane	8.3
M62 Mainline	12.09

LV = cars & LGV
HDV = HGV & buses

Please note: Some 'Actual' figures have been adjusted to replicate new bus flows which were added in manually (AM: Statham Avenue, Poplars Ave (GC to CR) and A50 School Road) (PM: Cotswold Road, Poplars Ave W of SE, Poplars Ave E of SE, Statham Avenue, Sandy Lane, Northway SB, Poplars Ave (GC to CR), A50 School Road, Poplars Ave s of CR and A49 s of A50 (southbound))

Typical Velocity speeds measured in 2019 ATC, apart from * which were measured in 2018 - speeds have been converted from Mph

Appendix DT/B

Correspondence between Rule 6 Party and WBC

Subject: RE: Peel Hall Inquiry
Date: Monday, 27 April 2020 at 14:39:01 British Summer Time
From: Taylor, Mike
To: Wendyjohnson@btinternet.com
CC: Fiona Bennett, Dickin, Alan, Hughes, Martha
Attachments: FW WBC Roadworks web-page.eml

Wendy,

All good thanks - hope you are keeping well. Apologies for my delay in getting back to you.

I can confirm that we had the conversation and that I referenced the fact that roadworks could affect the validity of data. I can confirm that Highgate were made aware of roadworks in the area. Their response from subsequent discussions included the following:

The traffic surveyor at that time commented that they did not observe any roadworks in the vicinity of the equipment that would cause the data collected by them to be unrepresentative.

The surveys were for checking purposes i.e. did not form the main body of the traffic analysis.

Surveys were carried out at the request of the air quality teams.

Survey data analysed was pre-Easter break.

I have copied in Fiona at Highgate for transparency in relation to the future Public Inquiry.

If you need any further information please let me know.

Regards

Mike

Mike Taylor

Transport Development Control Team Leader

Environment and Transport Directorate

Transport for Warrington

Warrington Borough Council

New Town House, Buttermarket Street, Warrington, WA1 2NH

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Office: 01925 444086 Mobile: 07966 884639

warrington.gov.uk

-----Original Message-----

From: Wendyjohnson@btinternet.com [mailto:wendyjohnson@btinternet.com]

Sent: 16 April 2020 15:07

To: Taylor, Mike <mike.taylor@warrington.gov.uk>

Subject: Peel Hall Inquiry

Hi Mike - I hope you and your family are keeping safe. Could you help me with some information I am seeking on behalf of the Rule 6 Inquiry Party.

During Easter school holidays last year we had a telephone conversation about traffic assessments on local roads which included Delph Lane, Mill Lane and Orford Lane. You said you would investigate and came back confirming that they were installed by Satnam. In the same conversation you told me that you had sent an email to Highgate Transport pointing out that these assessments were being carried out when there were roadworks in the vicinity that would affect the validity of the data recorded.

Could you confirm that we had this conversation and also forward onto me a copy of the email that you had sent to Highgate please?

The date of the email should be easy to locate as it was during school Easter holidays 2019.

Many thanks for your assistance

Regards

Wendy Johnson-Taylor

Sent from my iPad

Subject: RE: A couple of questions
Date: Wednesday, 29 July 2020 at 15:45:15 British Summer Time
From: Taylor, Mike
To: Wendyjohnson@btinternet.com
CC: Fiona Bennett, 'dave.tighe', Hughes, Martha

Wendy,

Apologies for my delay in replying.

It is recommended that the most available up to date data is utilised although older data can still be relevant. For the latest assessment the Council's Multi-modal Transport Model (WMMTM16) which has a base year of 2016 was used; this model has been calibrated and validated in line with guidance and is appropriate to allow forecasting of future traffic scenarios.

Adjustments were made to a cordon representing the Peel Hall study area to match a series of 2019 counts in areas where the strategic model had not been focussed before east of the A49. The 2019 counts were seasonally adjusted but not rebased to 2016. This enabled the Peel Hall model to be calibrated and validated in accordance with guidance and its distribution and outputs are considered appropriate.

The traffic lights at A49 Winwick Road/A50 Long Lane/Hawleys Lane are not controlled by MOVA but by the SCOOT system which links junctions along the A49 corridor to maximise operational efficiency.

I have copied in the appellant's Transport Consultant for transparency.

Regards

Mike

Mike Taylor

Transport Development Control Team Leader

Environment and Transport Directorate

Transport for Warrington

Warrington Borough Council

New Town House, Buttermarket Street, Warrington, WA1 2NH

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warrington.gov.uk

-----Original Message-----

From: Wendyjohnson@btinternet.com [mailto:wendyjohnson@btinternet.com]

Sent: 27 July 2020 20:17

To: Taylor, Mike <mike.taylor@warrington.gov.uk>

Subject: Re: A couple of questions

Hi Mike - more questions - How are the traffic lights at A49/Winwick Rd/Hawleys Lane controlled - are they MOVA controlled?

Also Highgate's traffic surveys were carried out on April 3rd - who agreed to this? Would WBC sanction this? Also there seems to be a pattern forming with Highgate's surveys. They seem to be carried out just before school holidays - in your experience does this period affect traffic volume i.e. People who don't have kids would probably choose to go on holiday before school breaks etc

Regards and thanks

Wendy Johnson-Taylor

Sent from my iPad

> On 20 Jul 2020, at 15:20, Wendyjohnson@btinternet.com <wendyjohnson@btinternet.com> wrote:

>

> Hi Mike

> Our Rule 6 party has asked me to contact you regarding traffic survey information. Can you tell me how up to date traffic information should be? We seem to think that it's three years. If this is correct, does this put into question Highgate's reference to surveys carried out in 2014 and 2016?

>

> Regards

> Wend

>

> Sent from my iPad