

Our ref: SE 861 086
Your ref: PA/2023/1124

North Lincolnshire Council
Church Square House
30-40 High Street
Scunthorpe
DN15 6NL

Simon GP Geoghegan
National Highways
2 City Walk,
Leeds
LS11 9AR

FAO: David Boreham, Ed Senior

November 14 2023

Dear David, Ed

Planning permission for the development of 599 No. dwellings on Land north of Burringham Road, Scunthorpe.

National Highways has reviewed the documentation accompanying the planning application [PA/2023/1124] and we offer the following comments.

Policy

The Transport Assessment and Travel Plan should be developed in accordance with policy, particularly the DfT policy paper 'Strategic road network and the delivery of sustainable development', December 2022 [[Circular 01/2022](#)]. As such, a vision for the development should be presented; we would expect to see a vision for encouraging active and sustainable travel, whilst limiting single occupancy car use. The vision should be supported by a set of strong and targeted measures and initiatives.

Trip Rates and Traffic Generation

The TA states that the trip rates utilised have been derived from the 2016 Arup Transport Assessment, which utilised the trip rates from a 2013 WSP Transport Assessment. We consider that the trip rates should be revisited to ensure they continue to be appropriate for use. Further, in accordance with Circular 01/2022, residual multi-modal [person] trip rates should be presented following the implementation of measures and initiatives to maximise the use of active and sustainable travel, limiting the use of single occupancy vehicle trips. We would also expect the forecast trip distribution to be presented for review.

Subject to traffic generation and distribution, junction capacity assessments may be required for Strategic Road Network [SRN] junctions. Where these are required, they should be undertaken in accordance with policy, particularly Circular 01/2022. We would offer the following guidance.

Capacity Assessments

As noted, subject to the impact of the proposed development on the Strategic Road Network, further assessments may be required. With regards to a threshold which may warrant a junction capacity assessment, the applicant should make reference to the following guidance:

- [National Planning Policy Framework](#) (Ministry of Housing, Communities and Local Government, 2023);
- National Highways' document '[Planning for the future: A guide to working with National Highways on planning matters](#)' (National Highways, 2023); and
- The [Department for Transport's Circular 01/2022](#).

We would refer the Applicant to 'Planning for the future: A guide to working with National Highways on planning matters', which states that National Highways will look at planning applications assessed as being 'severe' on a case-by-case basis. This will take into account the performance and character of the relevant section of the SRN and the predicted effects of the development on its safe operation.

The document also notes that *"new development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable"*. Further, assessments should consider the likely impact of residual trips (once measures to reduce the need to travel by car and improve access by sustainable modes have been considered). Hence, the developer's commitment to promoting sustainable modes of transport is an important consideration as part of junction assessments.

If assessments are required, we offer the following comments:

- Weekday peak hours – the applicant should take into account that the peak hour periods at SRN junctions may differ to those of the local highway network, and these should be agreed prior to the assessments being carried out;
- A weekday inter-peak period assessment may be required subject to the operation of the development, shift change patterns, and the volume of traffic on the network compared with the typical peak periods;
- Assessment years – in accordance with paragraph 50 of the Circular 01/2022, assessments should be conducted at an opening year to include trips generated by the proposed development, forecasted growth, and committed development. Further, for multi-phase developments, additional assessments shall be provided based on the opening of each phase; and
- In accordance with the Circular 01/2022 – *"Planned improvements to the SRN or local road network should also be considered in any assessment where there is a high degree of certainty that this will be delivered"*. Confirmation of any planned transport improvements should be agreed with NLC.

Committed Development

As noted, the applicant should review and include any relevant committed development traffic flows in the area that are likely to affect the flows at the relevant junctions in the assessment years. In accordance with Planning Practice Guidance, these should include development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years. Appropriate committed development flows should be agreed with NLC.

Circular 01/2022 also notes that the Transport Assessment must “consider existing and forecast levels of traffic on the SRN, alongside any additional trips from committed developments that would impact on the same sections (link or junction) as the proposed development”. We would make reference to Footnote 21 which states that:

“Where development proposals are consistent with an up-to-date plan or strategy (or where there is no up-to-date plan or strategy), this should include all relevant development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years and include the full amount of development to be built. Where development proposals are not consistent with an up-to-date plan or strategy, this should include all relevant development that is consented or allocated over the entirety of the plan period. In some instances, due regard should be had to permissions and allocations in neighbouring authorities. The inclusion or exclusion of specific developments should be agreed with the local planning authority at pre-application stage.”

Further, Circular 01/2022 notes that “planned improvements to the SRN or local road network should also be considered in any assessment where there is a high degree of certainty that this will be delivered”.

Forecasted Growth

Any assumptions underpinning the projected levels of traffic should be clearly stated so as to avoid the default factoring up of baseline traffic.

Mitigation

If the opening year assessments demonstrate that a mitigation scheme is required in order to accommodate the impact of the proposed development, there will be a number of requirements prior to determination of the planning application:

- GG142 walking, cycling and horse-riding assessment should be undertaken at the outset to inform the design of any mitigation scheme;
- As noted in Circular 01/2022, “GG 104 (or its subsequent update) identifies the framework and approach for safety risk assessment to be applied when undertaking any activity that may have an impact on safety on the SRN”.
- The design of road improvements should meet DMRB standards or clearly identify any departures from standard required;
- A Departure from Standards application may be required if the standards set out in DMRB are not achieved. This applies equally to over and under achievement of design standards; and
- A Stage 1 Road Safety Audit should be undertaken prior to the submission of the planning application.

Travel Plan

The Travel Plan [TP] targets should be revised; the current targets are not considered ambitious when taking into account the scale of the proposed development and the links to the wider Lincolnshire Lakes development.

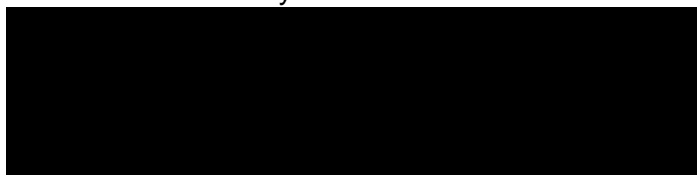
Further, TP monitoring should cover a period including five full years post final occupation.

Summary

Given the need for further information, National Highways has already issued a formal NHPR 22-12 response recommending a period of non-determination of six months.

I trust this response is helpful, but should you require any further information please do not hesitate to contact me.

Yours sincerely



Simon GP Geoghegan
Planning and Development



AA.23.19.06 Lincolnshire Lakes

Prepared for:	Simon Geoghegan
Prepared by:	Joshua Bell
Date:	8 th November 2023
Case Reference:	DevHU0097
Document Reference:	AA.23.19.06 TM02
Reviewed/approved by:	Terence Dale

Limitation: This document has been prepared on behalf of, and for the exclusive use of National Highways, and is subject to, and issued in accordance with, the provisions of the National Spatial Planning Contract. We accept no liability or responsibility whatsoever for, or in respect of, any use of, or reliance upon, this document by any third party.

Introduction

In March 2022, under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017, Keepmoat Homes Ltd. [the Applicant] submitted a request to North Lincolnshire Council for a screening opinion concerning the erection of 599 dwellings [ref. PA/SCR/2022/1] and the reduction of the permitted red line boundary concerning PA/2015/0396 [ref. PA/SCR/2022/2] on land north of Burringham Road, Scunthorpe.

Jacobs SYSTRA Joint Venture [JSJV] reviewed the request and, on behalf of National Highways, provided comments in March 2022 [AA.21.13.39].

Subsequently, in October 2023 JSJV was made aware that a planning application [ref. PA/2023/1124] has been submitted to the LPA for:

“Planning permission for the development of 599 No. dwellings and lake, along with associated infrastructure, including landscaping, public open space and play area, pedestrian and cycle links, pumping station and sub-station.”

The Applicant’s Transport Consultant is Local Transport Projects [LTP]; the Local Planning Authority [LPA] is North Lincolnshire Council [NLC]. This Technical Memorandum [TM02] will set out the JSJV review of the information presented.

Background

Lincolnshire Lakes Area Action Plan

The Lincolnshire Lakes Area Action Plan [AAP] sets out the planning policy framework within which the development will be delivered. The proposed development comprises a series of new village settlements, including the provision of up to 6,000 new homes.

Lincolnshire Lakes Outline Permission

The application site sits within the extant outline planning permission [ref. PA/2015/0396], which comprises 2,500 new homes, including a village centre, a health care facility, community facilities, a three-form entry primary school, new roads and footpaths, informal areas of open space, play spaces and wildlife habitats, water bodies and wetlands, with all matters reserved for subsequent approval. JSJV understands that permission was granted in August 2021 and that the application was accompanied by an Environmental Statement.

nineteen47 notes that:

“The proposed development for 599 homes is subject to a Full Application on part of the site subject to the Outline Permission. The application will supersede the element of the Outline Permission already approved.”

In April 2016, National Highways offered “No Objection” to the planning application [ref. PA/2015/0396].

JSJV notes that the application was approved and in the Decision Notice [5th August 2021] conditions were imposed on the consent including:

“37. Prior to the occupation of the 250th dwelling approved under PA/2015/0396 (served off Burringham Road), works to the M181 southern (terminating) junction roundabout including connection to the existing Burringham Road and associated roundabouts approved under PA/2015/0627, must be constructed and operational and accessible to motor vehicles.

Reason

To give alternative vehicular access arrangements to the proposed areas of housing and additional capacity to the transport network in the interests of free circulation of traffic, highway safety and in accordance with policy T2 of the North Lincolnshire Local Plan, policy T12 of the Lincolnshire Lakes Area Action Plan and policies CS1, CS4, CS25 and CS26 of the North Lincolnshire Core Strategy”

M181 highways and infrastructure works [ref. PA/2015/0628 and PA/2015/0627]

nineteen47 states that:

“The delivery of development within the site will also be supported by highways and infrastructure works covered by permissions ref: PA/2015/0628 and PA/2015/0627”.

With regard to the above, JSJV understands that, in terms of the highway infrastructure, ref: PA/2015/0627 is superseded by ref: PA/2017/1386.

JSJV would refer nineteen47 to the National Highways responses from June 2019 to planning applications ref: PA/2015/0627, PA/2015/0628 and PA/2015/0396:

“Highways England [now National Highways] has previously reviewed all three planning applications, and it is noted that both PA/2015/0627 and PA/2015/0396 have been superseded by PA/2017/1386, which Highways England also reviewed in the autumn of 2017.”

Planning reference PA/2017/1386 relates to the planning consent for highway works to deliver a new terminating junction to the M181 motorway. National Highways reviewed the Transport Assessment and Construction Environmental Management Plan [CEMP] produced by AECOM and recommended that the CEMP be secured through a planning condition and be approved by National Highways before construction work begins.

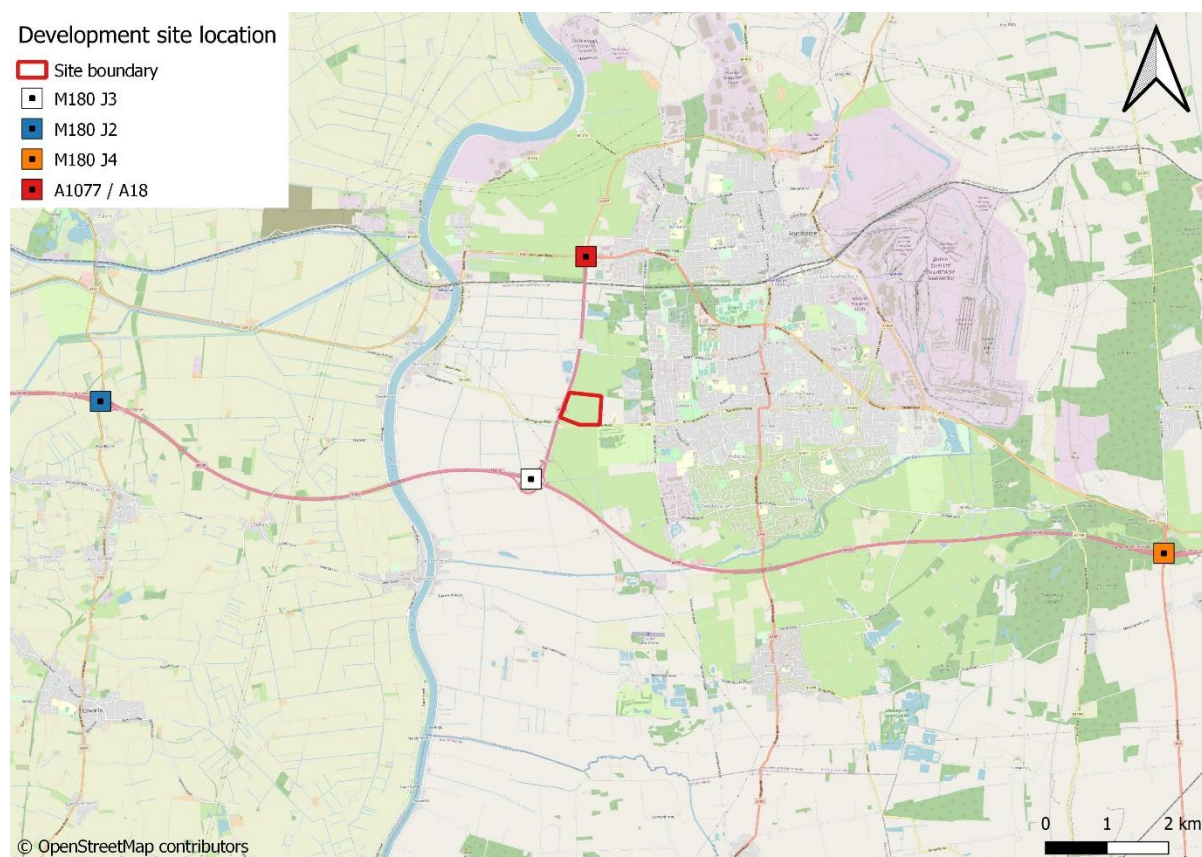
JSJV would also note, in April 2016, National Highways offered ‘No Objection’ to ref: PA/2015/0628; however, this application relates only to the hybrid application for a new road and footpaths, informal areas of open space, parklands, play areas and wildlife habitats, attenuation ponds, recreational lakes and wetlands community.

Existing situation

The location of the development site, relative to the Strategic Road Network [SRN], is presented in **Figure 1**. The site is located approximately:

- 1.2km north of the M180 / M181 junction (M180 J3);
- 7.8km east of the M180 / A161 junction (M180 J2);
- 9.7km west of M180 / A15 junction (M180 J4); and
- 2.6km south of the A1077 / A18 junction.

Figure 1. Site location in relation to the Strategic Road Network



Technical Review

JSJV has reviewed the documents uploaded to the planning portal including:

- Transport Assessment [TA], dated May 2023, produced by LTP;
- Travel Plan [TP], dated May 2023, produced by LTP;
- Planning Layout, dated 3rd August 2023, produced by nineteen47; and
- Local Highways Authority Consultation Response, dated 3rd October 2023.

North Lincolnshire Council Highways Consultation

JSJV is aware of a consultation response from NLC Highways which references Condition 37 of the previous approval [ref. PA/2015/0396]. Further the NLC response states that:

“As this is a full application, rather than an Approval of Reserved Matters application, I would have expected a full Transport Assessment (TA) (including junction capacity modelling of key junctions... to have been submitted.”

Further, it is noted that:

“Whilst junction capacity assessments were undertaken as part of the TA submitted with PA/2015/0396, the base traffic count data used for these is about 10 years old. It would have been good practice to revisit this modelling, with more recent traffic count data. Similarly, whilst the person trip rates have previously been agreed these are also 10 years old and should have been revisited as part of this application.”

JSJV is in agreement with NLC Highways, however, we would note that any trip rates and traffic generation analysis presented should be in accordance with Circular 01/2022. As such, we would expect to see multi-modal [person] trip rates presented after the implementation of initiatives and measures to maximise the use of active and sustainable travel, limiting the use of single occupancy vehicle trips.

It is important to note that the main point of access to the application site is noted to be a roundabout on Burringham Road, which gives access to the proposed M181 terminating roundabout (via Burringham Road). NLC Highways states that this access point is outside of the redline boundary and, as such, is outside of the developer's control. Further, NLC Highways states that timescales for the M181 terminating roundabout are not referenced in the TA or Planning Statement, this is something that JSJV would expect to see in the TA. Timescales for the opening of terminating roundabout will likely inform the opening year, or other, assessments of the proposed development.

Nonetheless, we have reviewed the information accompanying the application and offer the following comments.

Transport Assessment

The TA accompanying the planning application states that the proposed development forms part of the wider Lincolnshire Lakes development which involves the provision of up to 6,000 new homes, *“although the application represents a new full planning application and does not form a reserved matters application associated with the previous outline consent”*. The TA notes that it has been prepared in accordance with several policies including the National Planning Policy Framework [NPPF], however, no reference is made to Circular 01/2022. As such, the TA does not contain a vision for the proposed development; we would expect to see a vision for encouraging active and sustainable travel, whilst limiting single occupancy car use. The vision should be supported by a set of strong and targeted measures and initiatives.

The TA includes a site assessment of pedestrian and cycle provision, within the relevant sections key trip attractors and routes are presented including the National Cycle Network [NCN]. It is also noted that *“shared foot/cycleways measuring 3m in width are to be provided on at least one side of the main spine roads within the site, and will connect with wider future provision within the Lincolnshire Lakes development”*. It is also noted that a primary route network as identified in the Area Action Plan [AAP] for the wider Lincolnshire Lakes development will accommodate bus routes.

JSJV welcomes this provision, noting that it accords with Circular 01/2022 and the requirements to maximise opportunities for walking, wheeling, cycling and public transport.

applied to derive multi-modal trips, in accordance with the previous methodology; this information is presented in **Figure 3** for reference. As noted, the proposed development is forecast to generate 433 and 422 two-way trips in the AM and PM peak, respectively. JSJV would consider that the trip rates need to be revisited to ensure they continue to be appropriate for use.

JSJV refers to the NLC Highways comments and agrees that it is inappropriate to rely on trip rates that are ten years old. Further, residual multi-modal [person] trip rates should be presented following the implementation of measures and initiatives to maximise the use of active and sustainable travel, limiting the use of single occupancy vehicle trips.

Figure 3. Multi-Modal Trip Generation²

Person Trips	Modal Split	AM Peak (08:00-09:00)		PM Peak (17:00-18:00)	
		Arrivals	Departures	Arrivals	Departures
Driving a Car or Van	65.94%	87	334	251	160
Motorcycle, scooter or moped	1.33%	2	7	5	3
Taxi or minicab	0.44%	1	2	2	1
Vehicle Trip Generating	67.71%	90	343	258	164
Passenger in a Car or Van	8.77%	12	44	33	21
On foot	13.04%	17	66	50	32
Bicycle	5.97%	8	30	23	14
Bus, minibus or coach	3.56%	5	18	14	9
Train	0.35%	0	2	1	1
Other	0.59%	1	3	2	1
TOTAL	100%	132	506	380	242

*The total may not represent the sum of its parts due to rounding

Capacity Assessments

The TA states that trip distribution was assessed in 2016 as part of the Arup Transport Assessment and this included capacity assessments. JSJV would note that the capacity assessments are outdated and should be revisited to reflect more recent traffic data.

The TA notes that:

“The number of dwellings proposed does not trigger the need for additional mitigation measures agreed as part of the previous outline planning approval, therefore it is considered that the local highway network has suitable capacity to accommodate vehicle movements generated by the site. It is therefore expected that the proposals will not have a significant impact on the operation of the local highway network.”

JSJV would request that the trip distribution and the number of trips forecast to route via the SRN is presented for review. This will inform the decision on a need to undertake any SRN capacity assessments. This information should be presented in a comprehensive Transport Assessment, developed in accordance with prevailing policy.

² Extract from TA – Table 8

Travel Plan

JSJV has reviewed the TP accompanying the planning application with consideration to Circular 01/2022. We note that the TP presents accessibility sections for pedestrians, cyclists and public transport users, consistent with that presented in the TA.

Aim and Objectives

The overall aim of the TP is stated to be:

“To minimise the number of vehicle trips generated by the site, particularly single occupant trips, in favour of more sustainable travel.”

Although not stated to be the vision for the development, we would consider that this meets the requirements for Circular 01/2022. The TP also sets out the following objectives:

- 1) *To encourage residents and visitors of the proposed development to evaluate their travel patterns and consider options for more sustainable travel;*
- 2) *To increase awareness and actively promote travel by sustainable modes of transport, including the health and environmental benefits;*
- 3) *To set and agree appropriate targets that are regularly reviewed and amended if necessary to reflect changing circumstances;*
- 4) *To monitor the travel patterns and performance against the Travel Plan targets;*
and
- 5) *To provide a long term commitment to meeting the overall aim of this Travel Plan.*

Targets

The TP sets out a ‘baseline travel scenario’, utilising the modal split presented in **Figure 3**, which forecasts that 67.7% of trips will be made by vehicles [‘driving a car or van’, ‘motorcycle, scooter or moped’, and ‘taxi or minicab’]. The target for the proposed development is that by year 5 of the TP ‘no more than 61% of trips to be made by vehicle drivers’. JSJV would not consider that this is a particularly ambitious target when considering the scale of the proposed development, and the links to the wider Lincolnshire Lakes development. Further, all modes should be presented in a table showing the baseline mode share and target mode share.

Management

It is noted that ownership of the proposed development site and, therefore, responsibility for implementation of the TP will likely change in the future. The TP notes that:

“The site owner will be responsible for ensuring the provision of adequate resources to develop and implement the Travel Plan, including the appointment of a Travel Plan Coordinator (TPC)”.

As such, the Applicant cannot confirm or guarantee that the future site owner will fund and implement the TP in its entirety. We would, therefore, recommend that National Highways requests that a condition is imposed on any planning consent to require an updated TP prior to occupation of the proposed development, should NLC be minded to approve.

This notwithstanding, the TP outlines the TPC role and responsibilities which includes monitoring the TP and producing an annual progress report.

Monitoring

Circular 01/2022 states that:

“Targets for achieving a modal shift to sustainable transport will need to be subject to sustained monitoring and management by an appointed travel plan coordinator.”

In this regard, the TP notes that targets will be reviewed and amended as part of the annual review process. JSJV would note that TP targets should only be amended with approval from NLC in consultation with National Highways.

The TP provides a breakdown of monitoring at the various stages in the process; we would note that due to the scale of the proposed development, occupation is likely to occur over a number of years. We would recommend that baseline monitoring is undertaken within 12 months of first occupation, as proposed in the TP, however, the total monitoring period should cover five years after final occupation.

Measures

The TP presents several measures to promote walking, cycling, public transport and car sharing, including:

- *“Liaise with local schools in order to encourage the establishment of a ‘walking bus’ to / from the development;*
- *Promote the benefits of, and provide information on the established ‘Cycle to Work’ salary sacrifice scheme that residents should be able to access via places of employment;*
- *Meet local bus operators regarding the potential for re-routing or providing additional bus services to better accommodate the residents of the site and the surrounding area;*
- *Investigate the possibility of setting up a resident car share database at the site or joining an established car share database at an adjacent Lincolnshire Lakes development, subject to demand”; and*
- Producing a Welcome Travel Pack for all residents to receive upon occupation.

Summary

As highlighted, the TA and TP require amendments so that a sound decision can be made regarding the impact that the proposed development will have on the SRN. We would offer the following guidance.

Capacity Assessments

Subject to the impact of the proposed development on the Strategic Road Network, further assessments may be required. With regards to a threshold which may warrant a junction capacity assessment, the applicant should make reference to the following guidance:

- National Planning Policy Framework (Ministry of Housing, Communities and Local Government, 2021);
- National Highways’ document ‘Planning for the future: A guide to working with National Highways on planning matters’ (National Highways, 2023); and
- The Department for Transport’s Circular 01/2022.

As alluded to previously, we would refer the Applicant to ‘Planning for the future: A guide to working with National Highways on planning matters’, which states that National Highways will look at planning applications assessed as being ‘severe’ on a case-by-case basis. This will take into account the performance and character of the relevant section of the SRN and the predicted effects of the development on its safe operation.

The document also notes that *“new development should be facilitating a reduction in the need to travel by private car and focused on locations that are or can be made sustainable”*. Further, assessments should consider the likely impact of residual trips (once measures to reduce the need to travel by car and improve access by sustainable modes have been considered). Hence, the developer’s commitment to promoting sustainable modes of transport is an important consideration as part of junction assessments.

If assessments are required, we offer the following comments:

- Weekday peak hours – the applicant should take into account that the peak hour periods at SRN junctions may differ to those of the local highway network, and these should be agreed prior to the assessments being carried out;
- A weekday inter-peak period assessment may be required subject to the operation of the development, shift change patterns, and the volume of traffic on the network compared with the typical peak periods;
- Assessment years – in accordance with paragraph 50 of the Circular 01/2022, assessments should be conducted at an opening year to include trips generated by the proposed development, forecasted growth and committed development. Further, for multi-phase developments, additional assessments shall be provided based on the opening of each phase; and
- In accordance with the Circular 01/2022 – *“Planned improvements to the SRN or local road network should also be considered in any assessment where there is a high degree of certainty that this will be delivered”*. Confirmation of any planned transport improvements should be agreed with NLC.

Committed Development

As noted, the applicant should review and include any relevant committed development traffic flows in the area that are likely to affect the flows at the relevant junctions in the assessment years. In accordance with Planning Practice Guidance, these should include development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years. Appropriate committed development flows should be agreed with NLC.

Circular 01/2022 also notes that the Transport Assessment must *“consider existing and forecast levels of traffic on the SRN, alongside any additional trips from committed developments that would impact on the same sections (link or junction) as the proposed development”*. We would make reference to Footnote 21 which states that:

“Where development proposals are consistent with an up-to-date plan or strategy (or where there is no up-to-date plan or strategy), this should include all relevant development that is consented or allocated where there is a reasonable degree of certainty will proceed within the next 3 years and include the full amount of development to be built. Where development proposals are not consistent with an up-to-date plan or strategy, this should include all relevant development that is consented or allocated over the entirety of the plan period. In some instances, due regard should be had to permissions and

allocations in neighbouring authorities. The inclusion or exclusion of specific developments should be agreed with the local planning authority at pre-application stage.”

Further, Circular 01/2022 notes that *“planned improvements to the SRN or local road network should also be considered in any assessment where there is a high degree of certainty that this will be delivered”*.

Forecasted Growth

Any assumptions underpinning the projected levels of traffic should be clearly stated so as to avoid the default factoring up of baseline traffic.

Mitigation

If the opening year assessments demonstrate that a mitigation scheme is required in order to accommodate the impact of the proposed development, there will be a number of requirements prior to determination of the planning application:

- GG142 walking, cycling and horse-riding assessment should be undertaken at the outset to inform the design of any mitigation scheme;
- As noted in Circular 01/2022, *“GG 104 (or its subsequent update) identifies the framework and approach for safety risk assessment to be applied when undertaking any activity that may have an impact on safety on the SRN”*.
- The design of road improvements should meet DMRB standards or clearly identify any departures from standard required;
- A Departure from Standards application may be required if the standards set out in DMRB are not achieved. This applies equally to over and under achievement of design standards; and
- A Stage 1 Road Safety Audit should be undertaken prior to the submission of the planning application.

Summary and Conclusions

JSJV has reviewed the information accompanying the planning application [ref. PA/2023/1124] and our review has highlighted that this is a full planning application, not a Reserved Matters application pursuant to the previous outline planning application. As such, this planning application should be accompanied by a detailed Transport Assessment and Travel Plan, developed in accordance with prevailing policy, particularly Circular 01/2022.

The recommendation to National Highways in relation to this development proposals is:

Holding Recommendation – Further information is required to define an appropriate assessment of the Strategic Road Network.

This review has highlighted that this application should be subject to a Holding Recommendation for the reasons identified as follows:

- 1) The Transport Assessment and Travel Plan should be developed in accordance with policy;
- 2) A vision for the development should be presented;
- 3) Trip rates and distribution should be presented for review;
- 4) Residual traffic generation should be presented, following the impact of the TP measures and initiatives that should encourage active and sustainable travel, whilst limiting single occupancy vehicle use;
- 5) Subject to traffic generation and distribution, junction capacity assessments may be required. Where these are required, they should be undertaken in accordance with policy, particularly Circular 01/2022;
- 6) The TP targets should be revised; and
- 7) TP monitoring should cover a period including five full years post final occupation.

Further, due to the potential changes in ownership and management, we consider it appropriate to request that a condition is imposed on any planning consent requiring an updated TP to be submitted prior to occupation of the proposed development.