



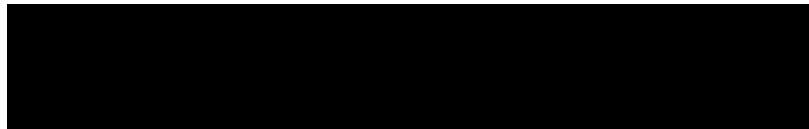
National Highways Planning Response (NHPR 24-02) Formal Recommendation to an Application for Planning Permission

From: Divisional Director
Operations Directorate
Highways England.
North East Region



To: North Lincolnshire Council – Ed Senior

CC:



Council's Reference: PA/2023/1124

Location: Lincolnshire Lakes, Land east of M181 and north of Burringham Road, Scunthorpe

Proposal: Development of 593 dwellings, 200 sqm commercial unit (use Class E) and lake, along with associated infrastructure, including landscaping, public open space and play area, pedestrian and cycle links, pumping station and sub-station.

National Highways Ref: NH/24/09085

Referring to the consultation on a planning application received December 12 2024 referenced above, in the vicinity of the M180/M181 that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- ~~a) offer no objection (see reasons at Annex A);~~
- b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions & reasons);**
- ~~c) recommend that planning permission not be granted for a specified period (see reasons at Annex A);~~
- ~~d) recommend that the application be refused (see reasons at Annex A)~~

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

The Local Planning Authority must also copy any consultation under the 2018 Direction to PlanningYNE@nationalhighways.co.uk

| | |
|-----------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|
| Signature:  | Date: December 31 2024 |
| Name: Simon GP Geoghegan | Position: Planning and Development |
| National Highways, 2 City Walk, Leeds LS11 9AR  | |

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs **74** and **109** prescribing that significant development should offer a genuine choice of transport modes, while paragraphs **108** and **114** advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the carbon reduction hierarchy (avoid-switch-improve) as set out in clause 4.3 of **PAS2080:2023** promotes approaches and measures to minimise resource consumption and thereby reduce carbon emissions.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.

Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

Recommended Conditions

Having reviewed all relevant information, National Highways would recommend that the development is acceptable subject to suitable conditions as follows:

1. *Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways, construction of the development hereby approved shall not take place unless and until evidence has been provided to demonstrate that the development complies with **Paragraphs 57 and 59** [Physical Infrastructure] of the [DfT Policy Paper 01/2022](#) 'strategic road network and the delivery of sustainable development' [December 2022].” All works shall be undertaken in accordance with the agreed plan and maintained as such thereafter.*

Reason:

To ensure the safe and continued operation of the SRN.

2. *No development earthwork or construction hereby approved shall commence until a geotechnical risk assessment of the works adjacent to the M1 boundary has been undertaken. This should accord with the requirements of CD622 of the Design Manual for Roads and Bridges (DMRB) and shall be agreed by the local authority in conjunction with National Highways.*

Reason:

To ensure the safe and continued operation of the SRN and our assets.

3. *Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors) no construction shall commence unless and until a detailed Construction Traffic Management Plan (CTMP) has been submitted to and approved in writing. Thereafter the construction shall be undertaken in accordance with the approved plan.*

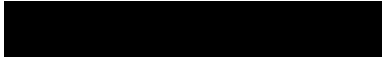
Reason:

To mitigate any adverse impact from the development on the M181 and M180 Motorways in accordance with DfT circular 01/2022.

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: Ed Senior

December 31 2024

Dear Ed,

Permission for development of 593ho and Shop on Land north of Burringham Road

We have reviewed the Transport Note [TN] prepared by LTP in relation to the revised planning application and would offer the following comments.

LTP notes that the revised proposals include the “...provision of a shop/local centre with a Gross Floor Area (GFA) of 200m² , adjacent to the proposed roundabout within the site frontage. The local centre will result in a reduction of 6 dwellings within the site, with a revised total of 593 dwellings”.

LTP has assessed the traffic impact of a single convenience store, which is typically trip intensive and as its size and scale means that it is likely to have a sole occupier. .

Trip rates and generation

After and independent analysis, as shown in Table 1, we have presented the difference in vehicle trip generation between the original 599 dwelling application and the revised development including a convenience store.

Table 1. Revised development vehicle trip generation comparison

| | AM Peak Period | | | PM Peak Period | | |
|--------------------------------------|----------------|------------|------------|----------------|------------|------------|
| | Arr. | Dep. | Two-way | Arr. | Dep. | Two-way |
| 599 Dwellings (original) | 89 | 342 | 432 | 257 | 164 | 421 |
| 593 Dwellings & local shop (revised) | 103 | 353 | 457 | 269 | 176 | 445 |
| Variance | +14 | +11 | +25 | +12 | +13 | +24 |

As can be seen in Table 1, the revised development is forecast to generate 25 more two-way vehicle trips in the AM peak and 24 more two-way vehicle trips in the PM peak.

We would note that within the TN LTP has not presented the distribution of vehicle trips on to the local highway network or the SRN. Previously, as part of the original TA, LTP did provide a vehicle trip distribution exercise and the impact on the SRN was considered acceptable.

However, we would note that not all trips to the proposed convenience store will be new and there will likely be a proportion of primary and non-primary trips. Due to the location of the development, we would suggest, however, that it is unlikely that a significant volume of new or diverted trips will use the SRN to travel to the convenience store

Furthermore, by providing a local convenience store, residents of the proposed development will be able to access a store by active methods of transport. Without the proposed store, residents would need to travel further, likely using private vehicles and possibly using the SRN.

In principle, therefore, we would suggest that the provision of a local convenience store within walking distance of the residential area has the potential to reduce the number of trips using the SRN to access other stores. We would also note that the revised development is in line with [DfT Circular 01/2022](#) where it is stated 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*”.

Construction Traffic Management Plan

We would reiterate that a CTMP will need to be prepared and anticipate that it will be subject to and be delivered via condition. The CTMP should be provided to National Highways for review.

Boundary Treatment

National Highways would reiterate that further information should be provided with regards to, but not exclusively:

- The impact of earthworks, including bunds, on the stability and integrity of the SRN;
- The impact of earthworks on drainage, and the drainage requirements needed to ensure that surface water does not flow from the application site on to the SRN;
- Access for maintenance of the highway boundary is maintained; and
- Boundary treatments are adequate and appropriate; particularly in regard to dazzle and distraction from opposing head lights.

On the basis of the above, I enclose National Highways’ formal NHPR 24-02 response recommending that the following conditions should remain attached to any planning permission that may be granted:

Recommended Conditions:

- 1) *Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways, construction of the development hereby approved shall not take place unless and until evidence has been provided to demonstrate that the development complies with Paragraphs 57 and 59 of the DfT Policy Paper 'strategic road network and the delivery of sustainable development' [December 2022].” All works shall be undertaken in accordance with the agreed plan and maintained as such thereafter.*

Reason: to ensure the safe and continued operation of the SRN.

- 2) *No development earthwork or construction hereby approved shall commence until a geotechnical risk assessment of the works adjacent to the M1 boundary has been undertaken. This should accord with the requirements of CD622 of the Design Manual for Roads and Bridges (DMRB) and shall be agreed by the local authority in conjunction with National Highways.*

Reason: to ensure the safe and continued operation of the SRN and our assets.

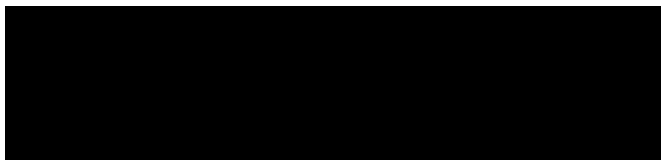
Informative: The applicant is advised to contact National Highways prior to appointing a Geotechnical Advisor to enable National Highways to agree their professional qualifications meet the requirements of CD622 and we can pass on any geotechnical asset information that may be relevant to the assessment.

- 3) *Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors), no construction shall commence unless and until a detailed Construction Phase Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways (or its successors). Thereafter the construction shall be undertaken in accordance with the approved plan.*

Reason: To manage construction traffic impacts and ensure the safe and efficient operation of the SRN.

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

PA/2023/1124: Lincolnshire Lakes

| | | | | | |
|---------------|-----------------|---------------|----------------|-------------------------|---------------|
| Case ref: | DevHU0097 | Document ref: | TM04 | Date issued: | 24/12/2024 |
| Prepared for: | Simon Geoghegan | Prepared by: | Harry Robinson | Reviewed / approved by: | James Quigley |

Limitation: This technical memorandum [TM] 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.

Headline Summary

| Planning Outcome | Site Location |
|----------------------------------------------------------------------------------|---------------|
| <p>The recommendation to National Highways is recommended conditions.</p> | |

Technical Summary

In principle we would suggest that the provision of a local convenience store within walking distance of the residential area has the potential to reduce the number of trips using the SRN to access other stores. The JSJV would also note that the revised development is in line with Circular 01/2022 were it is stated 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”.

- Condition: Boundary Treatment/Retaining Structures/Bunds
 - Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways, construction of the development hereby approved shall not take place unless and until evidence has been provided to demonstrate that the development complies with Paragraphs 57 and 59 of the DfT Policy Paper ‘strategic road network and the delivery of sustainable development’ [December 2022].” All works shall be undertaken in accordance with the agreed plan and maintained as such thereafter.
 - Reason: to ensure the safe and continued operation of the SRN.
- Condition: Construction Management Plan
 - Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors), no construction shall commence unless and until a detailed Construction Phase Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways (or its

successors). Thereafter the construction shall be undertaken in accordance with the approved plan.

- Reason: To manage construction traffic impacts and ensure the safe and efficient operation of the SRN.

1 Introduction and Background

- 1.1 In August 2023, Keepmoat Homes Ltd [the Applicant] submitted a full planning application (ref: PA/2023/1124) for the development of 599 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] and the Local Planning Authority [LPA] is North Lincolnshire Council [NLC].
- 1.2 In February 2024, National Highways conducted a review of the Transport Assessment [TA] and Travel Plan [TP], prepared by LTP, and recommending that the following planning conditions be applied to any granted planning permission:
- Condition: Boundary Treatment/Retaining Structures/Bunds
 - Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways, construction of the development hereby approved shall not take place unless and until evidence has been provided to demonstrate that the development complies with Paragraphs 57 and 59 of the DfT Policy Paper 'strategic road network and the delivery of sustainable development' [December 2022]." All works shall be undertaken in accordance with the agreed plan and maintained as such thereafter.
 - Reason: to ensure the safe and continued operation of the SRN.
 - Condition: Construction Management Plan
 - Unless otherwise agreed in writing by the Local Planning Authority in consultation with National Highways (or its successors), no construction shall commence unless and until a detailed Construction Phase Traffic Management Plan has been submitted to and approved in writing by the Local Planning Authority in consultation with National Highways (or its successors). Thereafter the construction shall be undertaken in accordance with the approved plan.
 - Reason: To manage construction traffic impacts and ensure the safe and efficient operation of the SRN.
- 1.3 The Applicant has since made an amendment to the original application proposing a reduction of 6 dwellings and a provision of a shop/local centre, with a GFA of 200m².
- 1.4 LTP has provided a Transport Note [TN] in to assess the impact of the provision of a local centre as part of a planning application. On behalf of National Highways, the Jacobs SYSTRA Joint Venture has reviewed the TN and letter and offers the following comments.

2 Existing Situation

- 2.1 The location of the development site, relative to the Strategic Road Network [SRN], is presented in **Figure 1**. The site is located approximately:
- 2.4km north of the M180 / M181 junction (M180 J3); and
 - Adjacent to the M181 / A1077(M) roundabout.

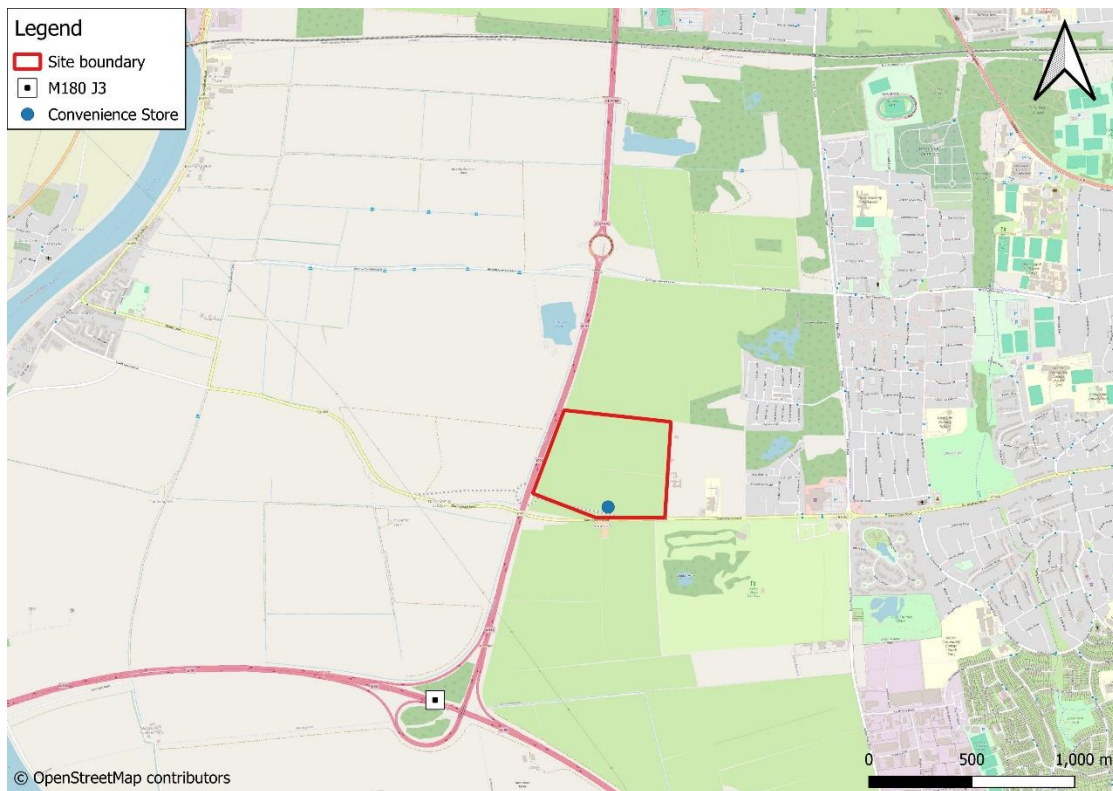


Figure 1. Site location in relation to the Strategic Road Network

3 Proposed development

- 3.1 LTP notes that the revised proposals include the “...provision of a shop/local centre with a Gross Floor Area (GFA) of 200m², adjacent to the proposed roundabout within the site frontage. The local centre will result in a reduction of 6 dwellings within the site, with a revised total of 593 dwellings”.
- 3.2 LTP has assessed the traffic impact of a single convenience store, which is typically trip intensive and as its size and scale means that it is likely to have a sole occupier.
- 3.3 The JSJV would note, as seen in **Figure 2**, a total of 14 car parking spaces are proposed.



Figure 2. Proposed site layout¹

4 Trip Generation

4.1 Previously, the JSJV consider LTP’s vehicle trip generation, as shown in **Figure 3**, derived from the consented Arup person trip rates to be appropriate.

Table 7: Consented Modal Split & Projected Vehicle Trip Generation

| | AM Peak (08:00-09:00) | | PM Peak (17:00-18:00) | |
|------------------------------|-----------------------|-------|-----------------------|-------|
| Person Trip Rate | 0.220 | 0.844 | 0.634 | 0.404 |
| Person Trips (599 Dwellings) | 132 | 506 | 380 | 242 |

| Person Trips | Modal Split | 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 PERSON TRIPS | 100% | 132 | 506 | 380 | 242 |

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

Figure 3. LTP proposed person trip rates and vehicle trip generation (Arup TA, 2016)

4.2 LTP, however, has updated their vehicle trip generation, as shown in **Figure 4**, using vehicle trip rates derived from TRICS that were previously considered inappropriate by the JSJV.

¹ Appendix 1, Technical Note

Table 1: Residential Trip Generation

| Houses Privately Owned (03-A) | AM Peak (08:00-09:00) | | PM Peak (17:00-18:00) | | 12-Hour (07:00-19:00) | |
|------------------------------------------------|-----------------------|------------|-----------------------|------------|-----------------------|------------|
| | Arrivals | Departures | Arrivals | Departures | Arrivals | Departures |
| Person Trip Rates (per dwelling) | 0.222 | 0.810 | 0.545 | 0.279 | 3.586 | 3.696 |
| Person Trips (599 dwellings) | 133 | 485 | 326 | 167 | 2,148 | 2,213 |
| Vehicle Trips (599 dwellings) – 64% Car Driver | 85 | 311 | 209 | 107 | 1,375 | 1,417 |
| Person Trips (593 dwellings) | 132 | 480 | 323 | 165 | 2,128 | 2,191 |
| Vehicle Trips (593 dwellings) – 64% Car Driver | 85 | 307 | 207 | 106 | 1,362 | 1,403 |
| Change in Person Trips | -1 | -5 | -3 | -2 | -20 | -22 |
| Change in Vehicle Trips | - | -4 | -2 | -1 | -13 | -14 |

Figure 4. LTP proposed vehicle trip generation

4.3 Taking in to account that we previously considered the person and vehicle trip rates shown in **Figure 4** to be inappropriate after an independent analysis, the JSJV would note that we do not consider LTP’s proposed vehicle trip generation to be appropriate considering the large variance compared to JSJV’s previous analysis.

JSJV Independent Analysis

4.4 The JSJV has reassessed the change in vehicle trip generation, as shown in **Table 1**, using the person trip rates and vehicle mode share, as shown in **Figure 3**, that were previously considered appropriate.

Table 1. vehicle trip rate and generation

| | AM Peak Period | | | PM Peak Period | | |
|-------------------------------|----------------|-----------|-----------|----------------|-----------|-----------|
| | Arr. | Dep. | Two-way | Arr. | Dep. | Two-way |
| Trip rate | 0.220 | 0.844 | 1.064 | 0.634 | 0.404 | 1.038 |
| Person trip generation (599) | 132 | 506 | 637 | 380 | 242 | 622 |
| Person trip generation (593) | 130 | 500 | 631 | 376 | 240 | 616 |
| Vehicle trip generation (599) | 89 | 342 | 432 | 257 | 164 | 421 |
| Vehicle trip generation (593) | 88 | 339 | 427 | 255 | 162 | 417 |
| Variance | -1 | -3 | -4 | -3 | -2 | -4 |

4.5 As can be seen from **Table 1**, we forecast that the revised proposed residential aspect of the development will generate 4 fewer two-way vehicle trips in the AM peak and 4 fewer vehicle trips in the PM peak compared to the previous application.

Convenience Store Trip generation

4.6 LTP has derived person trip rates from the TRICS online database (version: 7.11.3) for a convenience store, the results of this analysis are shown in **Figure 5**, with the TRICS selection parameters outlined as follows:

- TRICS Land Use Category: 01 / O (Retail / Convenience Store);
- Location: Edge of Town; Suburban Area; Neighbourhood Centre;
- Trip rate parameter: Gross Floor Area;
- Actual Range: 292m² – 550m²; and
- Calculation Factor: 100m²

Table 2: Local Centre Person Trip Generation

| Convenience Store (01-O) | AM Peak (08:00-09:00) | | PM Peak (17:00-18:00) | |
|------------------------------------------------|-----------------------|------------|-----------------------|------------|
| | Arrivals | Departures | Arrivals | Departures |
| Person Trip Rates (per 100m ² GFA) | 18.564 | 17.933 | 17.513 | 17.453 |
| Projected Person Trips (200m ² GFA) | 37 | 36 | 35 | 35 |

Table 3: Local Centre Modal Split & Vehicle Trip Generation

| Mode of Travel | Modal Split | AM Peak (08:00-09:00) | | PM Peak (17:00-18:00) | |
|------------------------|-------------|-----------------------|------------|-----------------------|------------|
| | | Arrivals | Departures | Arrivals | Departures |
| Vehicle Drivers | 40.6% | 15 | 15 | 14 | 14 |
| Vehicle Passengers | 8.7% | 3 | 3 | 3 | 3 |
| Pedestrians | 45.6% | 17 | 16 | 16 | 16 |
| Cyclists | 2.3% | 1 | 1 | 1 | 1 |
| Public Transport Users | 2.7% | 1 | 1 | 1 | 1 |
| TOTAL | 100% | 37 | 36 | 35 | 35 |

Figure 5. LTP proposed vehicle trip generation local centre

4.7 As can be seen from **Figure 5**, LTP forecasts that the proposed convenience store aspect of the development will generate 30 two-way vehicle trips in the AM peak and 28 two-way vehicle trips in the PM peak. The JSJV would note that the method of travel was also derived from the TRICS surveys.

4.8 For comparison, the JSJV has undertaken a trip rate analysis using the TRICS Online Database (version 7.11.4), the results of this analysis are shown in **Table 2** with the TRICS selection parameters outlined as follows:

- TRICS Land Use Category: 01 / O (Retail / Convenience Store);
- Location: Edge of Town; Suburban Area; Neighbourhood Centre;
- Trip rate parameter: Gross Floor Area;
- Actual Range: 275m² – 574m²; and
- Calculation Factor: 100m²

Table 2. The JSJV proposed vehicle trip generation analysis

| | AM Peak Period | | | PM Peak Period | | |
|--|----------------|------|---------|----------------|------|---------|
| | Arr. | Dep. | Two-way | Arr. | Dep. | Two-way |
| | | | | | | |

| | | | | | | |
|------------------------------|-----------|-----------|-----------|-----------|-----------|-----------|
| LTP person trip rate | 18.564 | 17.933 | 36.497 | 17.513 | 17.453 | 34.966 |
| JSJV person trip rate | 17.860 | 16.955 | 34.815 | 18.848 | 19.156 | 38.004 |
| LTP person trip generation | 37 | 36 | 73 | 35 | 35 | 70 |
| JSJV person trip generation | 36 | 34 | 70 | 38 | 38 | 76 |
| LTP vehicle trip generation | 15 | 15 | 30 | 14 | 14 | 28 |
| JSJV vehicle trip generation | 16 | 15 | 31 | 17 | 17 | 34 |
| Variance | +1 | +1 | +2 | +3 | +3 | +6 |

- 4.9 As can be seen from **Table 2**, when using the JSJV trip rates, we forecast the proposed convenience store aspect of the development to generate 2 more two-way vehicle trips in the AM peak and 6 more two-way vehicle trips in the PM peak compared to LTP.
- 4.10 The JSJV would note that LTP does forecast a similar volume of vehicle trips in the AM peak and PM peak. We would, therefore, be inclined to consider LTP’s vehicle trip rates derived from TRICS to be appropriate.

Total vehicle trip generation comparison

- 4.11 As shown in **Table 3**, the JSJV has presented the difference in vehicle trip generation between the original 599 dwelling application and the revised development including a convenience store.

Table 3. Revised development vehicle trip generation comparison

| | AM Peak Period | | | PM Peak Period | | |
|--------------------------------------|----------------|------------|------------|----------------|------------|------------|
| | Arr. | Dep. | Two-way | Arr. | Dep. | Two-way |
| 599 Dwellings (original) | 89 | 342 | 432 | 257 | 164 | 421 |
| 593 Dwellings & local shop (revised) | 103 | 353 | 457 | 269 | 176 | 445 |
| Variance | +14 | +11 | +25 | +12 | +13 | +24 |

- 4.12 As can be seen in **Table 3**, the revised development is forecast to generate 25 more two-way vehicle trips in the AM peak and 24 more two-way vehicle trips in the PM peak.
- 4.13 The JSJV would note that within the TN LTP has not presented the distribution of vehicle trips on to the local highway network or the SRN. Previously, as part of the original TA, LTP did provide a vehicle trip distribution exercise and the impact on the SRN was considered acceptable.
- 4.14 However, the JSJV would note that not all trips to the proposed convenience store will be new and there will likely be a proportion of primary and non-primary trips. Due to the location of the development, the JSJV would suggest, however, that it is unlikely that a significant volume of new or diverted trips will use the SRN to travel to the convenience store
- 4.15 Furthermore, by providing a local convenience store, residents of the proposed development will be able to access a store by active methods of transport. Without the proposed store, residents would need to travel further, likely using private vehicles and possibly using the SRN.
- 4.16 In principle, therefore, we would suggest that the provision of a local convenience store within walking distance of the residential area has the potential to reduce the number of trips using the SRN to access other stores. The JSJV would also note that the revised development is in line with Circular 01/2022 where it is stated 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*”.