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 Sent: 02 March 2021 17:04  
 To: [REDACTED]-consulting.co.uk  
 Cc: admin@sutherlandpls.com; Metrowest1 <Metrowest1@planninginspectorate.gov.uk>; [REDACTED]@wbd-uk.com>  
 Subject: Response to cTc-2018-F-008 Ashton Gate MetroWest Letter R Guyatt 26022021

Dear Mr [REDACTED],

Thank you for the prompt clarification and reply to Richard Guyatt's correspondence of 24<sup>th</sup> February 2021. To expedite a response prior to the Issue Specific Hearing on

Thursday 4<sup>th</sup> March, Mr Guyatt has asked us to respond directly to you on behalf of the Applicant, in relation to specific points regarding ETM traffic movements.

Please note that last week's correspondence was to seek clarification on a particular point. Absence of specific comment does not mean acceptance by the Applicant of all other information provided or that it is accurate.

Mr Guyatt's recent communication to you was aimed at understanding your response to the question relating to ETM traffic movements (ExQA TT.2.4 part xlv), in order to clarify matters prior to the Issue Specific Hearings. This was because your response [in REP5-044] could not be reconciled with any other information about traffic movements or ETM's overall site usage, and in effect also does not provide the information about ETM traffic movements requested by the Examining Authority.

In your letter dated 26<sup>th</sup> February 2021, you note that the error you made in your first submission [REP5-044] is one of "terminology", and that this has "no effect on the conclusions", that your analysis of ETM weighbridge data demonstrates a "considerable increase in vehicle movements in and out of Ashton Vale Industrial Estate". You go on to note that [in REP5-044] where you had indicated: "Typically, on a weekday, ETM sees of the order of 3,500 lorry loads deposited at the site..." (and so on for other movements), that this was not actually movements per day, but movements per month as a total for all of the weekdays in the month. There were 23 weekdays in May 2017, of which two were Bank Holiday Mondays, so the figures quoted were at least 21 times larger than those indicated in the original submission [REP5-044] as being typical for a weekday. This flowed through to all data provided for ETM movements [in REP5-044].

However, your most recent response still does not appear to deal with the Examining Authority's request for similar information to be provided for ETM movements as had been provided for Manheim Auctions in Table 4.1 in your Deadline 4 Submission [REP4-050], which contains typical daily totals for traffic movements associated with Manheim Auctions. The remainder of your discussion of ETM traffic movements focuses entirely on changes over time, going on to criticise at length some indicative payload to vehicle conversion information that was (as you surmised and commented) only provided for illustrative purposes.

Such illustrative payloads were employed in an attempt to understand the typical weekday movements figures you provided, which could not be reconciled with any other information about traffic movements or ETM's overall site usage. It is perhaps worth noting at this point that this type of analysis has never been utilised in any assessment or modelling of the Ashton Vale Road junction.

Returning to the matter of ETM traffic movements, you note that "the key conclusions in my previous correspondence referred not to the absolute numbers of vehicles, but to the proportional increases" and that the latest submission confirms your conclusions. However, such a conclusion represents a narrow focus that has the potential to obscure the significance of the absolute numbers. The absolute number of vehicles is important, as this context is key to the significance that should be given to the initial situation and any increases. Simply put, a large increase of a small number will still result in a relatively small number, which will affect its significance.

As such, below is a table of estimated ETM traffic movements. This takes the figures you provided for monthly total ETM movements [in REP5-044], and applies some basic assumptions to estimate typical average weekday per day totals, as well as hourly movements based on an average hour across the day and specific estimates for the AM and PM peak hours, in turn based on assumptions noted in your submission [REP5-044] about operating hours. As we are sure you appreciate, it is not the total amount of movement across a month or day that is material to traffic assessments across congested networks, but the way that traffic movements relate to periods of high demand in the local network. As this table is largely based on information you have supplied, please can you confirm you accept it is a reasonable estimate of the situation, in the absence of any more specific or detailed information being provided.

#### ETM movements

Movement type		time period	May 2017			'Current operation'			Increase 2017 to 'current'			
			in	out	2-way	in	out	2-way	in	out	2-way	%
Main	Total (of all weekdays)	MONTH	2,200	2,200	4,400	3,500	3,500	7,000	1,300	1,300	2,600	
	Average weekday	DAY	105	105	210	167	167	333	62	62	124	
	Average hour	HOUR	10	10	20	16	16	32	6	6	12	59%
	08:00-09:00	AM peak	10	10	20	16	16	32	6	6	12	
	17:00-18:00	PM peak	3	-	3	4	-	4	1	-	1	
Processed	Total (of all weekdays)	MONTH	400	400	800	600	600	1,200	200	200	400	
	Average weekday	DAY	19	19	38	29	29	57	10	10	19	
	Average hour	HOUR	2	2	4	3	3	6	1	1	2	50%
	08:00-09:00	AM peak	2	2	4	3	3	6	1	1	2	
	17:00-18:00	PM peak	1	-	1	1	-	1	-	-	-	
TOTAL	Total (of all weekdays)	MONTH	2,600	2,600	5,200	4,100	4,100	8,200	1,500	1,500	3,000	
	Average weekday	DAY	124	124	248	195	195	390	71	71	143	
	Average hour	HOUR	12	12	24	19	19	38	7	7	14	58%
	08:00-09:00	AM peak	12	12	24	19	19	38	7	7	14	
	17:00-18:00	PM peak	4	-	4	5	-	5	1	-	1	

Note: ETM movements for May 2017 and 'current operation' from "Sutherland Property & Legal Services Ltd on behalf of ETM Contractors Ltd and Manheim Auctions Limited Deadline 5 Submission - Responses to the ExA's ExQ2" [REP5-044]

#### Assumptions:

- 21 weekdays in the month of May 2017 (excludes bank holiday Mondays), also used for 'current operation'
- 10.5 hours of operation in a day - arrivals noted in REP5-044 as 6:30am to 5:00pm (worst case: departures indicated as 5:00am to 4:30pm, 11.5 hrs)
- 100% arrivals and departures in AM peak hour compared to average hour - i.e. same as average hour
- 25% arrivals in the PM peak hour compared to average hour (REP5-044 indicates no departures after 5:00pm)
- 0% departures in the PM peak hour compared to a average hour (REP5-044 indicates no departures after 4:30pm)

It is clear from this table that, while there has been an apparent increase in movements associated with ETM from May 2017 to the "current operation", the absolute numbers involved on a daily and hourly basis are very small, with only an around 14 additional vehicle movements (two-way) in an average hour when comparing the "current operation" with May 2017. Also, as you note in your previous submission [REP5-044], hardly any movements occur in the PM peak hour (which is considered the key time period for congestion on the local highway network).

As such, the Applicant does not consider these figures significant to the operation of Ashton Vale Road and its junction with Winterstoke Road.

The table below illustrates the context of absolute values through comparison with traffic count information for Ashton Vale Road, across similar time periods with estimated movements to/from ETM (taking estimated ETM movements from the table above).

Ashton Vale Road Traffic Counts			May 2017			all HGVs as % of all vehicles			ETM movements as % all HGVs			ETM movements as % all vehs		
Counts	time period		to Ind.Est	from	2-way	to Ind.Est	from	2-way	in	out	2-way	in	out	2-way
all HGVs	Weekday (07:00-19:00)	12 hrs	296	287	583	20%	17%	18%						
	Average hour	1 hr	29	29	58	24%	20%	22%						
	08:00-09:00	AM peak	32	25	57	17%	32%	21%						
	17:00-18:00	PM peak	6	5	11	21%	2%	4%						
ETM	Weekday (07:00-19:00)	12 hrs	124	124	248				42%	43%	42%	8%	7%	8%
	Average hour	1 hr	12	12	24				41%	41%	41%	10%	8%	9%
	08:00-09:00	AM peak	12	12	24				38%	48%	42%	6%	15%	9%
	17:00-18:00	PM peak	4	-	4				67%	-	36%	14%	-	2%
ALL vehicles	Weekday (07:00-19:00)	12 hrs	1,467	1,698	3,165									
	Average hour	1 hr	122	142	264									
	08:00-09:00	AM peak	193	78	271									
	17:00-18:00	PM peak	29	229	258									

This table indicates that, in May 2017, around 18% of all vehicles entering/leaving Ashton Vale Road industrial estate were HGVs, and some 42% of all HGVs were associated with the estimated ETM traffic movements. Only approximately 8% of all traffic using Ashton Vale Road is related to ETM, and any increase in ETM movements has to be considered in this context. The increase in ETM movement postulated by your figures would imply a change in HGV traffic using Ashton Vale Road from 58 to 72 HGVs per average hour (two-way). This is not a significant change in absolute numbers of HGVs, let alone in relation to total traffic flow.

Hence, while your analysis of ETM weighbridge data demonstrates a potential rise in movements associated with ETM's own operations, it does not identify a "considerable increase in vehicle movements in and out of Ashton Vale Industrial Estate".

Regards,

[Redacted]

[Redacted]

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