HNRFI – ExAQ2 – Warwickshire County Council responses to EXA questions		
ExQ	**Question:**	**WCC Response**
2.0.1.	**Revised National Planning Policy Framework** In December 2023 a revised version of the National Planning Policy Framework was published. All Interested Partis are given the opportunity to make representations on how any changes affect consideration of the Proposed Development.	The changes are in response to the Levelling Up and Regeneration Bill and predominantly affect the Local Planning Authorities areas of responsibility, and therefore we have no comments to make.
2.0.2.	**Submission of documents** A number of interested parties have provided hyperlinks to other documents outside their submissions in response to questions raised. Annex H of the Rule 6 letter [PD-005] and PINS Advice Note 8.4 make clear that submissions must not include hyperlinks. This is because the Examining Authority, Interested Parties and the Secretary of State cannot rely on documents/evidence that the Inspectorate cannot directly control in respect of availability and content (including from a UK General Data Protection Regulation perspective). All parties are asked to review their submissions and, where necessary, provide copies of the information sought, indicating the relevant document(s) (using the Examination Library reference) and the location within that document to allow accurate identification.	In ExQ1 we copied two hyperlinks as follows: REP2-077 – this document is already part of the Examination Library App-142 – this document was submitted by the applicant
2.0.4.	**Planning Obligation** a) Could the Applicant please ensure that the full text of the draft Obligation (that is including the Appendices) is provided. b) Could the Local Authorities please comment on any draft Obligations that they seen, but have not as yet been submitted into the Examination, as well as those they have been submitted.	WCC is in agreement with the other Local Authorities that WCC should not be a party to the s106 Agreement as we do not have ability to carry out enforcement. However it is noted that should the DCO be approved there may be a requirement for Blaby DC to collect contributions towards off-site highway improvements to be carried out by National Highways, and that both Blaby and National Highways would prefer WCC to hold any contributions. In respect of that obligation, WCC consider that any contribution should be paid on commencement of development (not occupation as

		proposed) to be consistent with the delivery of other off-site mitigation which the applicant has stated will be in place prior to occupation.
2.5.6.	**Schedule 2, Part 2 – Fees** The Applicant has finalised its drafting of these provisions. Could the Local Authorities indicate whether they are content with this. If not, could they please provide alternative drafting, explaining why they consider this should be preferred.	Within the dDCO the following definition is given - "discharging authority" means the authority from whom a consent, approval or agreement is required or requested by the undertaker under the requirement concerned; Whilst this would usually been correlated to a discharge of condition application in the conventional planning process, the dDCO includes provision for consents/approvals from the Local Highway Authority to carry out works. The payment of fees associated with technical approvals, commuted sums and roadspace booking is covered at Schedule 13 Part 4 – Payments (for WCC) and so our understanding is that Schedule 2b, Part 2 – Fees is not relevant to WCC. However we do note the current drafting refers to a 42 day period for the return of fees is applications are undetermined. As previously advised, if an LPA is reliant on consultees for advice, the consultation period is a minimum of 21 days, so achieving a 42 day turnaround is likely to be unreasonable.
2.11.1.	**Furnessing** The Applicant states that additional surveys have been undertaken at the relevant junctions to allow for confirmation of traffic flows utilising the agreed furnessing methodology. a) Can the Applicant set out those junctions where surveys have taken place and when the surveys will report. b) Can the Applicant, NH and LCC please set out their respective positions on this matter	b) with respect to the junctions of interest to WCC (Gibbet Hill, Cross-in-Hands, Longshoot-Dodwells and M69 junction 1) these have been reviewed with respect to the November 2023 surveys carried out and the forecast 2036 without development. The furnessed turning flows included within the BWB spreadsheet received 18th December 2023 have been used to carry out the ARCADY and VISSIM assessments (as reported in submitted Doc 18.13.2 rev 01), and if the turning movements are incorrect then the

	including what the implications are for the overall modelling and when final positions are likely to be identified?.	mitigation identified is unlikely to address the true impacts of the development. The general principle of the furnessing methodology is acceptable, however the resultant matrices do not appear to have been sense checked to ensure traffic assignment/turning movements reflect that which would be expected in reality. Concerns are raised with regards to the resultant turning matrices derived from the furnessing process as applied to the PRTM forecast link flows, at both Cross in Hands and Gibbet Hill junctions. For instance at the Cross-in-Hands junction there have been significant increases in traffic turning from B4027 Lutterworth Road (Arm D) to the A4303 E (Arm B) in the AM Peak and from the A4303 E (Arm B) to the B4027 Lutterworth Road (Arm D) in the PM Peak. The cells highlighted yellow in WCC Spreadsheet 1.xlsx (attached) shows that the proportion has increased from 5% to 12% in the AM Peak and 5% to 10% in the PM Peak when comparing the 2023 observed surveys and the 2036 WoD flows – notwithstanding that increases in volumes would be expected over the 2023 to 2036 period, the proportions would not be expected to change so significantly. Similarly there has been a decrease in the proportion of vehicles travelling from A5 North (Arm A) to A5 South (Arm C) and vice versa in the PM Peak – from 18% to 8% in the AM Peak and from 15% to 9% in the PM Peak as shown in the cells highlighted orange in WCC Spreadsheet 1.xlsx.

		In discussion with the applicants transport consultants they have advised that this is the result of the furnessing methodology being doubly constrained. However this does not explain why the growth predicted by PRTM is assigned to the B4027 and not assigned to more appropriate routes such as the A5, there is no significant allocated development along the B4027 corridor. Just agreeing to the mitigation at this junction based on the PRTM forecasts is not appropriate given the impacts on the village of Pailton would not be mitigated. This matter was raised at the model scoping stage, and WCC requested that the RRAM model be used to assess impacts on the WCC network. More information is required to understand the reason for the growth assignments within PRTM for the Cross in Hands junction and this needs to be compared to those in the RRAM. We anticipate that the junction assessments should be rerun with either the observed surveyed and then furnessed turning flows adjusted if necessary for the PRTM growth assumptions, or rerun with the observed surveyed turning flows and the RRAM forecast growth and HNRFI development traffic added. At the Gibbet Hill junction, Gibbet Lane (Arm C) is forecast to have an increase in traffic entering the junction from this arm. In the AM Peak there is an increase from 4% to 11% as shown in the cells highlighted yellow in WCC Spreadsheet 2.xlsx (attached) whilst for the PM Peak the proportion entering into Arm C remains consistent at around 3% as shown in the cells highlighted in orange.

		Whilst there is an increase in both AM and PM peak hours for the A5 South (Arm D) to A426 S (Arm E) this is considered potentially to be attributable to committed developments i.e. DIRFT, Houlton and Coton Park East and is therefore not a concern. These are indicated in WCC Spreadsheet 2 (cells shaded blue). The increase in traffic using Gibbet Lane at the Gibbet Hill junction is not considered to be realistic given that Gibbet Lane principally provides access to a quarry and relatively small villages such as Shawell and Swinford. Whilst furnessing to the PRTM forecast link flows (origin and destination matrix totals) is acceptable in principle some of the individual cells/turning movements are questionable and therefore this brings into question the outputs and needs to be clarified. If the turning movements are incorrect, then the modelling carried out will not reflect the likely reality and will be an incorrect base on which to assess the development impacts. As a consequence any mitigation scheme identified will not necessarily be suitable to address the true impacts of the development. WCC will continue to discuss this issue with the applicant and will update at each Deadline. It is noted that to date a VISSIM assessment of Gibbet Hill has not been carried out by the applicant. WCC's previous comments from Deadline 1 are listed below and these set out why an assessment is necessary to enable a CIL compliant decision to be made in respect of any potential contributions in mitigation of development impacts.

		3.21.→Whilst·BWB·has·noted·in·its·response·to·point·19·in·HNRFI-BWB-GEN-XX-RP-TR-0031·Rev·P01·that·there·is·not·full·correspondence·between·the·18·entry·points·identified·within·the·VISSIM·model·and·the·traffic·flows·derived·from·PRTM,·Warwickshire·County·Council·consider·that·it·is·still·important·for·the·VISSIM·to·be·used·to·assess·development·impact·for·the·reasons·set·out·below:¶ • → National·Highways·does·not·have·a·committed·scheme·at·this·junction·as·highlighted·previously·and·therefore·the·baseline·position·for·the·modelling·must·be·the·existing·non-signalised·junction·arrangement·(i.e.,·a·Do·Nothing)¶ • → Blocking·back·towards·M6·Junction·1·along·the·A426·and·platooning·of·traffic·between·M6·Junction·1·and·the·Gibbet·Hill·junction·can·only·be·considered·within·the·VISSIM·model¶ • → Whilst·Warwickshire·County·Council·understands·that·flow·correspondence·may·only·exist·across·8·loading·points,·we·do·not·necessarily·consider·this·to·be·a·limitation·which·invalidates·the·use·of·the·VISSIM·model·¶ • → For·example,·if·the·loading·points·within·the·VISSIM·model·which·correspond·to·the·PRTM·data·include·the·A5·(2),·the·A426·north·and·south·(2)·the·M6·(2)·and·Gibbet·Lane·(1)·then·there·is·sufficient·network·correspondence·to·assign·the·development·trips·across·the·study·area·from·the·PRTM·outputs·¶ • → Warwickshire·County·Council·does·not·require·the·interaction·on·the·minor·roads·(i.e.,·Lutterworth·Road·or·Arthur·James·Drive)·to·be·considered·in·terms·of·changes·in·development·flows·and,·as·such,·impacts·at·these·locations·can·still·be·considered,·particularly·in·the·context·of·the·effects·arising·from·delivery·of·any·proposed·mitigation·at·Gibbet·Hill.¶ 3.22.→Therefore·for·these·reasons·Warwickshire·County·Council·does·not·accept·the·modelling·or·proposed·mitigation·at·this·location,·and·requires·the·VISSIM·modelling·to·be·carried·out.¶

WCC Spreadsheet 1.xlsx

AM Peak

J27 - A5 / A4303 / B4027 / Coal Pit lane

Junction Arm	
A	A5 N
B	A4303 E
C	A5 S
D	B4027 S
E	Coal Pit Lane W

2023 Observed Flows (PCU)

	A	B	C	D	E	TOTAL
A	0	437	503	48	4	992
B	332	0	226	223	76	857
C	216	234	2	13	62	527
D	40	154	19	0	1	214
E	20	149	80	6	0	255
TOTAL	608	974	830	290	143	2845

2023 Observed Flows (PCU) as a % of Total Throughput

	A	B	C	D	E	TOTAL
A	0%	15%	18%	2%	0%	35%
B	12%	0%	8%	8%	3%	30%
C	8%	8%	0%	0%	2%	19%
D	1%	5%	1%	0%	0%	8%
E	1%	5%	3%	0%	0%	9%
TOTAL	21%	34%	29%	10%	5%	100%

WoD 2036 FINAL MATRIX (PCUs)

	A	B	C	D	E	TOTAL
A	0	573	330	43	4	950
B	622	0	217	311	112	1262
C	288	316	2	13	70	689
D	122	455	29	0	2	608
E	37	272	72	19	0	400
TOTAL	1069	1616	650	386	188	3909

WoD 2036 FINAL MATRIX (PCUs) as a % of Total Throughput

	A	B	C	D	E	TOTAL
A	0%	15%	8%	1%	0%	24%
B	16%	0%	6%	8%	3%	32%
C	7%	8%	0%	0%	2%	18%
D	3%	12%	1%	0%	0%	16%
E	1%	7%	2%	0%	0%	10%
TOTAL	27%	41%	17%	10%	5%	100%

Diffs (PCU)

	A	B	C	D	E	TOTAL
A	0	136	-173	-5	0	-42
B	290	0	-9	88	36	405
C	72	82	0	0	8	162
D	82	301	10	0	1	394
E	17	123	-8	13	0	145
TOTAL	461	642	-180	96	45	1064

Diffs

	A	B	C	D	E	TOTAL
A	0%	-1%	-9%	-1%	0%	-11%
B	4%	0%	-2%	0%	0%	2%
C	0%	0%	0%	0%	0%	-1%
D	2%	6%	0%	0%	0%	8%
E	0%	2%	-1%	0%	0%	1%
TOTAL	6%	7%	-13%	0%	0%	0%

% Diffs

	A	B	C	D	E	TOTAL
A	0%	31%	-34%	-10%	0%	-4%
B	87%	0%	-4%	39%	47%	47%
C	33%	35%	0%	0%	13%	31%
D	205%	195%	53%	0%	100%	184%
E	85%	83%	-10%	217%	0%	57%
TOTAL	76%	66%	-22%	33%	31%	37%

WCC Spreadsheet 1.xlsx

PM Peak

J27 - A5 / A4303 / B4027 / Coal Pit lane

Junction Arm	
A	A5 N
B	A4303 E
C	A5 S
D	B4027 S
E	Coal Pit Lane W

2023 Observed Flows (PCU)

	A	B	C	D	E	TOTAL
A	0	262	337	26	4	629
B	405	0	236	128	130	899
C	418	203	0	17	108	746
D	74	277	3	0	7	361
E	5	79	43	1	0	128
TOTAL	902	821	619	172	249	2763

2023 Observed Flows (PCU) as a % of Total Throughput

	A	B	C	D	E	TOTAL
A	0%	9%	12%	1%	0%	23%
B	15%	0%	9%	5%	5%	33%
C	15%	7%	0%	1%	4%	27%
D	3%	10%	0%	0%	0%	13%
E	0%	3%	2%	0%	0%	5%
TOTAL	33%	30%	22%	6%	9%	100%

WoD 2036 FINAL MATRIX (PCUs)

	A	B	C	D	E	TOTAL
A	0	539	372	102	7	1020
B	623	0	209	382	247	1461
C	353	214	0	24	109	700
D	87	370	2	0	10	469
E	6	107	36	2	0	151
TOTAL	1069	1230	619	510	373	3801

WoD 2036 FINAL MATRIX (PCUs) as a % of Total Throughput

	A	B	C	D	E	TOTAL
A	0%	14%	10%	3%	0%	27%
B	16%	0%	5%	10%	6%	38%
C	9%	6%	0%	1%	3%	18%
D	2%	10%	0%	0%	0%	12%
E	0%	3%	1%	0%	0%	4%
TOTAL	28%	32%	16%	13%	10%	100%

Diffs (PCU)

	A	B	C	D	E	TOTAL
A	0	277	35	76	3	391
B	218	0	-27	254	117	562
C	-65	11	0	7	1	-46
D	13	93	-1	0	3	108
E	1	28	-7	1	0	23
TOTAL	167	409	0	338	124	1038

Diffs

	A	B	C	D	E	TOTAL
A	0%	5%	-2%	2%	0%	4%
B	2%	0%	-3%	5%	2%	6%
C	-6%	-2%	0%	0%	-1%	-9%
D	0%	0%	0%	0%	0%	-1%
E	0%	0%	-1%	0%	0%	-1%
TOTAL	-5%	3%	-6%	7%	1%	0%

% Diffs

	A	B	C	D	E	TOTAL
A	0%	106%	10%	292%	75%	62%
B	54%	0%	-11%	198%	90%	63%
C	-16%	5%	0%	41%	1%	-6%
D	18%	34%	-33%	0%	43%	30%
E	20%	35%	-16%	100%	0%	18%
TOTAL	19%	50%	0%	197%	50%	38%

WCC Spreadsheet 2.xlsx

AM Peak

GIBBET ROUNDABOUT

Junction Arm	
A	Watling Street N
B	Rugby Road
C	Gibbet Lane
D	Wattling Street S
E	Rugby Road W

2023 Observed Flows (PCU)

	A	B	C	D	E	TOTAL
A	0	5	32	353	452	842
B	2	0	25	139	547	713
C	20	23	1	5	57	106
D	328	219	32	5	193	777
E	189	215	19	100	0	523
TOTAL	539	462	109	602	1249	2961

2023 Observed Flows (PCU) as a % of Total Throughput

	A	B	C	D	E	TOTAL
A	0%	0%	1%	12%	15%	28%
B	0%	0%	1%	5%	18%	24%
C	1%	1%	0%	0%	2%	4%
D	11%	7%	1%	0%	7%	26%
E	6%	7%	1%	3%	0%	18%
TOTAL	18%	16%	4%	20%	42%	100%

WoD 2036 FINAL MATRIX (PCUs)

	A	B	C	D	E	TOTAL
A	0	1	32	245	382	660
B	1	0	30	101	506	638
C	46	36	6	10	267	365
D	463	118	87	6	433	1107
E	191	138	33	126	0	488
TOTAL	701	293	188	488	1588	3258

WoD 2036 FINAL MATRIX (PCUs) as a % of Total Throughput

	A	B	C	D	E	TOTAL
A	0%	0%	1%	8%	12%	20%
B	0%	0%	1%	3%	16%	20%
C	1%	1%	0%	0%	8%	11%
D	14%	4%	3%	0%	13%	34%
E	6%	4%	1%	4%	0%	15%
TOTAL	22%	9%	6%	15%	49%	100%

Diffs (PCU)

	A	B	C	D	E	TOTAL
A	0	-4	0	-108	-70	-182
B	-1	0	5	-38	-41	-75
C	26	13	5	5	210	259
D	135	-101	55	1	240	330
E	2	-77	14	26	0	-35
TOTAL	162	-169	79	-114	339	297

Diffs

	A	B	C	D	E	TOTAL
A	0%	0%	0%	-4%	-4%	-8%
B	0%	0%	0%	-2%	-3%	-4%
C	1%	0%	0%	0%	6%	8%
D	3%	-4%	2%	0%	7%	8%
E	-1%	-3%	0%	0%	0%	-3%
TOTAL	3%	-7%	2%	-5%	7%	0%

% Diffs

	A	B	C	D	E	TOTAL
A	0%	-80%	0%	-31%	-15%	-22%
B	-50%	0%	20%	-27%	-7%	-11%
C	130%	57%	500%	100%	368%	244%
D	41%	-46%	172%	20%	124%	42%
E	1%	-36%	74%	26%	0%	-7%
TOTAL	30%	-37%	72%	-19%	27%	10%

WCC Spreadsheet 2.xlsx

PM Peak

GIBBET ROUNDABOUT

Junction Arm	
A	Watling Street N
B	Rugby Road
C	Gibbet Lane
D	Wattling Street S
E	Rugby Road W

2023 Observed Flows (PCU)

	A	B	C	D	E	TOTAL
A	0	5	25	230	362	622
B	1	0	16	163	450	630
C	20	19	0	13	46	98
D	432	125	23	7	134	721
E	290	468	14	111	4	887
TOTAL	743	617	78	524	996	2958

2023 Observed Flows (PCU) as a % of Total Throughput

	A	B	C	D	E	TOTAL
A	0%	0%	1%	8%	12%	21%
B	0%	0%	1%	6%	15%	21%
C	1%	1%	0%	0%	2%	3%
D	15%	4%	1%	0%	5%	24%
E	10%	16%	0%	4%	0%	30%
TOTAL	25%	21%	3%	18%	34%	100%

WoD 2036 FINAL MATRIX (PCUs)

	A	B	C	D	E	TOTAL
A	0	3	15	246	359	623
B	1	0	17	220	549	787
C	22	20	0	33	93	168
D	469	220	49	15	335	1088
E	207	485	13	166	4	875
TOTAL	699	728	94	680	1340	3541

WoD 2036 FINAL MATRIX (PCUs) as a % of Total Throughput

	A	B	C	D	E	TOTAL
A	0%	0%	0%	7%	10%	18%
B	0%	0%	0%	6%	16%	22%
C	1%	1%	0%	1%	3%	5%
D	13%	6%	1%	0%	9%	31%
E	6%	14%	0%	5%	0%	25%
TOTAL	20%	21%	3%	19%	38%	100%

Diffs (PCU)

	A	B	C	D	E	TOTAL
A	0	-2	-10	16	-3	1
B	0	0	1	57	99	157
C	2	1	0	20	47	70
D	37	95	26	8	201	367
E	-83	17	-1	55	0	-12
TOTAL	-44	111	16	156	344	583

Diffs

	A	B	C	D	E	TOTAL
A	0%	0%	0%	-1%	-2%	-3%
B	0%	0%	0%	1%	0%	1%
C	0%	0%	0%	0%	1%	1%
D	-1%	2%	1%	0%	5%	6%
E	-4%	-2%	0%	1%	0%	-5%
TOTAL	-5%	0%	0%	1%	4%	0%

% Diffs

	A	B	C	D	E	TOTAL
A	0%	-40%	-40%	7%	-1%	0%
B	0%	0%	6%	35%	22%	25%
C	10%	5%	0%	154%	102%	71%
D	9%	76%	113%	114%	150%	51%
E	-29%	4%	-7%	50%	0%	-1%
TOTAL	-6%	18%	21%	30%	35%	20%