

LAND AT MODEL FARM, PORT ROAD, RHOOSE

Statement on Traffic Matters

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Statement on
Traffic Matters
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Contents

1	INTRODUCTION.....	1
2	THE EFFECT OF THE PROPOSED DEVELOPMENT ON TRAFFIC MOVEMENT.....	2
3	CONCLUSIONS.....	8

1 INTRODUCTION

Qualifications and Experience

- 1.1 My name is David John Archibald. I am a Director of RPS Transport, part of the Planning division of RPS, a Tetra Tech company, based in the Oxford office. I hold a Master of Science Degree in Transportation Engineering from Edinburgh Napier University and a Bachelor of Science Honours Degree in Civil Engineering from Edinburgh Napier University. I am a Member of the Chartered Institute of Highways and Transportation and I am also a Member of the Transport Planning Society.
- 1.2 I have worked in the field of transport planning and traffic engineering for over 20 years and I have acted on behalf of private and public sector clients for a large range of schemes and land uses.
- 1.3 I have previously given evidence at various public inquiries and hearings as well as to the HS2 Select Committee on transport and highway matters.
- 1.4 I am familiar with the appeal site and with the adjacent transport network and I have visited the appeal site and the adjacent transport network on a number of occasions.
- 1.5 The evidence which I have prepared and provide for this appeal reference CAS-02641-G8G7M5 in this Statement is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

Scope of Statement

- 1.6 RPS Transport and Engineering has been providing transport advice to Legal & General (Strategic Land) Ltd and providing support to their planning applications on the appeal site since 2018. I have been responsible for RPS' transport related input and support since 2019.
- 1.7 My Statement considers the third matter to be considered by the appeal: '**the effect of the proposed development on traffic movement**'.
- 1.8 I set out in Section 2 the traffic matters considered as part of the appeal reference CAS-02641-G8G7M5 and that Highway Officers at the Vale of Glamorgan Council (VoGC), as the Local Highway Authority, are in agreement to the assessment methodology, the assessments undertaken, the conclusions and the mitigation. My conclusions are set out in Section 3

2 THE EFFECT OF THE PROPOSED DEVELOPMENT ON TRAFFIC MOVEMENT

Assessment

- 2.1 In advance of submitting the planning application, a transport scoping and pre-application exercise was undertaken with Highway Officers at VoGC, their appointed independent consultant, Welsh Government and Transport for Wales. Two scoping reports were issued, one in November 2018 and another in March 2019.
- 2.2 These set out the proposed methodology of assessment and were agreed with VoGC, their appointed independent consultant, Welsh Government and Transport for Wales. The 2023 Committee Report sets out that this was 'considered acceptable and robust'.
- 2.3 The agreed methodology utilised the South East Wales Transport Model (SEWTM), as agreed with VoGC, their appointed independent consultant, Welsh Government and Transport for Wales. This is owned by Welsh Government and managed and maintained by Transport for Wales and includes developments and transport schemes known to Welsh Government and Transport for Wales and the allocated sites in the adopted VoGC Local Development Plan 2011 to 2026 (as well as those from other surrounding Authorities' respective Local Development Plans).
- 2.4 The 2023 Committee Report states: 'it is, therefore, considered that the TA [Transport Assessment] (and associated Technical Note) provide for a robust basis for traffic impacts to be assessed'.
- 2.5 The effect of the proposed development on traffic movement is set out in the Transport Assessment, Chapter 4 of the Environmental Statement and Chapter 4 of the Environmental Statement Addendum. A Technical Note was prepared following submission of the planning application to address post submission comments from VoGC and their appointed independent consultant who reviewed those documents on behalf of VoGC.
- 2.6 These documents conclude that with mitigation the development can be accommodated without detriment to the existing highway safety or the operation of the local highway network and that there would be no significant effects arising.
- 2.7 These conclusions were agreed with VoGCs independent consultant who reviewed those documents on behalf of VoGC and with VoGC as confirmed in the Statement of Common Ground whilst there were no associated objections from Welsh Government and Transport for Wales.
- 2.8 VoGC provided two putative reasons for refusal to the planning application (VoGC reference 2019/00871/OUT) within their Statement of Case. Neither of these related to traffic.

Mitigation

- 2.9 During post submission discussions with VoGC, the nature and timing of transport mitigation was identified and set out in the Revised Transport Implementation Strategy and a subsequent Transport Implementation Strategy Addendum. The 2023 Committee Report states: 'The TIS [Transport Implementation Strategy] and its addendum have been reviewed by the Highways Engineer, who is in agreement in regard to its conclusions and raises no objection in relation to traffic generation / congestion'.

2.10 The transport mitigation and timing as set out in the Revised Transport Implementation Strategy are agreed with VoGC, as confirmed in the Statement of Common Ground. Mitigation is timed for the following phasing of occupation and as set out below:

- Prior to occupation;
- Before 20,000m² Gross Floor Area (GFA) is occupied;
- Before 40,000m² GFA is occupied;
- Before 120,000m² GFA is occupied; and
- Before 170,000m² GFA is occupied.

2.11 Prior to any occupation, the Appellant will be responsible for improving the bus stop infrastructure on Port Road and providing active travel infrastructure within the appeal site.

2.12 Before 20,000m² GFA is occupied, an active travel route would be provided along Port Road West to provide such a route between the appeal site and Weycock Cross.

2.13 This active travel route is identified within Policy MG16 (2) of the Local Development Plan (A4050 Port Road to Cardiff Airport walking and cycling proposal) and the Local Transport Plan 2015-2030 (A4050 Culverhouse Cross to Cardiff Airport Element 2: A4050 Port Road to Cardiff Airport).

2.14 The 2023 Committee Report notes that: '**The scheme is identified within Policy MG16 (2) (Transport Proposals) as an improvement which will support the strategic objectives of the Plan and realise enhanced sustainable transport facilities. The Vale of Glamorgan Local Transport Plan 2015-2030 also identifies it as a high priority scheme**'. I refer to Mr Parker's Statement on the delivery and policy aspects of the active travel route.

2.15 Based upon the wording of the 2023 Committee Report, the delivery of this active travel route would perform a far wider public function than simply providing access to the appeal site.

2.16 The provision of such active travel routes would typically be expected to result in a mode shift away from the private car. Given the wider public function that it would serve, the active travel route could be expected to reduce wider (background) traffic flows along the A4226 Port Road upon its implementation. This would provide a wider benefit to the public by reducing background traffic flows along the A4226 Port Road as a result of that mode shift.

2.17 Before c is occupied, initial improvements to bus services (to consider frequency, capacity and routeing) would be made with further improvements made at 120,000m² GFA occupation. The improvements would be instigated by the Appellant in collaboration with VoGC and other key stakeholders in conjunction with the bus operators.

2.18 At these levels of occupancy (40,000m² and 120,000m² GFA), there would be an existing demand for bus services at the appeal site that would increase with further occupancy. The bus operators would be able to monitor patronage and fare income as part of their existing services (as bus operators do on an ongoing basis as part of their ongoing service management). That would identify patronage and fare income increasing as occupancy at the appeal site increases. This would provide the evidence to the bus operators of that increasing demand and to provide improved bus services to accommodate that demand.

2.19 The active travel route improvement is specific in terms of its timing and extents. The precise delivery of the other improvements is not defined other than being linked to the build out of the proposed development. This is to allow for flexibility as wider demand changes over time and bus services change over time. Allowing for such flexibility allows for the improvements to be adaptive to the services and frequencies at that time of improvement so as to allow for services to be optimised to cater not only for the proposed development but also for the wider demand. The 2023 Committee Report states: 'the TIS [Transport Implementation Strategy] has provided a Public Transport Strategy and a Travel Plan was submitted with the initial application. This has been reviewed by the Council's Transport Manager and is considered to be an appropriate framework for public transport improvements'.

2.20 Before 170,000m² GFA is occupied, highway improvements would be made to the Port Road West arm of Waycock Cross (left turn slip). The Waycock Cross junction is identified within Policy MG16 (Highway Improvement Works) of the Local Development Plan as requiring improvement to mitigate the impact of its allocated sites. This improvement would be instigated by the Appellant in collaboration with VoGC.

2.21 As above, this transport mitigation and timing is agreed with VoGC, as confirmed in the Statement of Common Ground.

Further Considerations

Changes in Traffic Flows

2.22 The Transport Implementation Strategy Addendum considered any recent changes in traffic flows that may have occurred. It concluded that 2022 traffic flows in the local area were broadly similar to traffic flows at the time of data gathering for preparing the Transport Assessment and that the traffic survey work that informed the Revised Transport Implementation Strategy (and Transport Assessment) remained relevant and up to date.

2.23 The 2023 Committee Report states: 'The TIS [Transport Implementation Strategy] and its addendum have been reviewed by the Highways Engineer, who is in agreement in regard to its conclusions and raises no objection in relation to traffic generation / congestion'.

2.24 Traffic surveys were undertaken in 2023 as part of the CaVC Advanced Technology Centre planning application (VoGC reference: 2024/00329/FUL) and were included within their submitted Transport Assessment. Two of those traffic surveys were undertaken at the same locations that were considered within the Transport Implementation Strategy Addendum.

2.25 From reviewing that 2023 traffic survey data, one of the surveys appears to have reporting issues or some other issue because the traffic flows are abnormally low during some periods (10 to 20 vehicle movements per hour along the A4226 Port Road West to the east of Weycock Cross). A review of the traffic modelling results contained within that Transport Assessment indicates that these are as expected. This suggests that the traffic flows used as part of that modelling is as expected and that the issues with the 2023 traffic survey data is simply a reporting issue rather than a data issue.

2.26 I have therefore considered the remaining traffic survey at the A4226 West of Port Road. I have extracted the 2023 traffic flows from that traffic survey and have added those to the data within the Transport Implementation Strategy Addendum. This exercise is set out in Table 1 and

provides a comparison of traffic flows along the A4226 West of Port Road during 2016, 2022 and 2023.

Table 1: Comparison of 2023 Traffic Flows with Recent Traffic Flows

A4226 West of Port Road		
	08:00-09:00	17:00-18:00
2023 surveyed traffic flows	686	806
2022 surveyed traffic flows	694	805
2016 surveyed traffic flows	705	817
2022 traffic flows as a proportion of 2016 traffic flows	98%	99%
2023 traffic flows as a proportion of 2016 traffic flows	97%	99%

* Traffic flows are two-way (both directions)

- 2.27 As can be seen, the 2023 surveyed traffic flows are broadly similar to the 2022 and the 2016 traffic surveys on the A4226 west of Port Road.
- 2.28 Based upon this, there is no evidence to suggest that there have been any changes in traffic flows since the time of data gathering for preparing the Transport Assessment.
- 2.29 Based upon this, the evidence shows that the traffic survey work that informed the Revised Transport Implementation Strategy (and Transport Assessment) remains relevant and up to date.

Other Developments

- 2.30 As above, the Transport Assessment was undertaken using SEWTM, as agreed with VoGC, their appointed independent consultant, Welsh Government and Transport for Wales. This traffic model includes developments and transport schemes known to Welsh Government and Transport for Wales and the allocated sites in the adopted VoGC Local Development Plan 2011 to 2026 (as well as those from other surrounding Authorities' respective Local Development Plans).
- 2.31 It is noted that the CaVC Advanced Technology Centre was granted planning permission in 2024 (VoGC reference: 2024/00329/FUL). The traffic flows for this development are included within SEWTM. Thus, the traffic modelling contained within the Transport Assessment includes this development.
- 2.32 VoGC are currently preparing their Replacement Local Development Plan to cover the period 2021 to 2036.
- 2.33 Candidate sites have been submitted to VoGC and I note the caution VoGC state on their Candidate Sites webpage which reads:

'It is important to note that the submission of sites and their inclusion in the Candidate Sites Register does not guarantee that they will be taken forward into the Deposit RLDP. All candidate sites will be subject to a robust assessment process to determine their suitability or otherwise for allocation'.

2.34 One of those candidate sites is the redevelopment of Aberthaw Power Station. There are no details available on this other than 'green energy park' and it has an unspecified land use with similarly unspecified and unknown potential traffic generation. From a traffic perspective, its traffic generation, transport infrastructure requirements and transport mitigation have not yet been formed and are in their infancy. Any forthcoming proposals would be subject to a planning application and planning permission to identify these traffic related considerations in accordance with the other candidate sites and the VoGC caution, above.

2.35 Notwithstanding, Table 1 shows that traffic flows have been broadly similar between 2016 and 2023. Given that there has been no evidenced growth in weekday peak hour traffic flows during this period, this suggests that there is headroom in the traffic flows used for the highway capacity modelling undertaken in the Transport Assessment.

2024 Land Uses

2.36 As part of the ES Addendum, revised land uses were estimated based upon current market conditions (i.e. what may be built out based upon the current market conditions). I refer to these as the '2024 land uses'.

2.37 I refer to Mr Sutton's Statement for all matters relating to the preparation of those estimates. Appendix 4.1 of the ES Addendum set out the traffic generation considerations of the 2024 land uses.

2.38 It noted that the total GFA of the 2024 land uses equates to 126,339 m² whereas the Transport Assessment assessed a total GFA of 189,725 m².

2.39 On this basis, the assessments within the Transport Assessment represent a +50% increase in GFA over and above those of the 2024 land uses.

2.40 This means that the Transport Assessment assesses a total GFA that is +50% higher than that estimated based upon current market conditions.

2.41 It went on to note that the 2024 land uses would generate fewer vehicle movements than those assessed within the Transport Assessment.

2.42 It sets out that the 2024 land uses would generate -347 and -299 fewer vehicle movements during the weekday AM and PM peak hours in comparison to those assessed within the Transport Assessment.

2.43 Although these are the predictions based upon current market conditions, Appendix 4.1 of the ES Addendum also set out the traffic generation considerations based upon these uplifted to a total GFA of 189,725 m². This would allow a direct comparison of the traffic generated by the 2024 land uses with those of the Transport Assessment on a like for like basis (the same total GFA).

2.44 It sets out that the uplifted 2024 land uses would generate -147 and -108 fewer vehicle movements during the weekday AM and PM peak hours in comparison to those assessed within the Transport Assessment.

2.45 This sets out that the 2024 land uses would generate up to -347 fewer vehicle movements per hour than those assessed within the Transport Assessment. Whilst the uplifted 2024 land uses

would generate up to -147 fewer vehicle movements per hour than those assessed within the Transport Assessment.

2.46 This provides confidence that the highway capacity modelling undertaken in the Transport Assessment has been prepared on a robust basis.

Transport Impact

2.47 The above has set out some key considerations in relation to the assessments contained within the Transport Assessment:

- There is no evidence of any changes in background traffic flows in 2023 to those in 2022 and 2016;
- The traffic modelling includes developments and transport schemes known to Welsh Government and Transport for Wales and the allocated sites in the adopted VoGC Local Development Plan 2011 to 2026 (as well as those from other surrounding Authorities' respective Local Development Plans);
- The traffic modelling includes the CaVC Advanced Technology Centre that was granted planning consent in 2024;
- VoGC caution that consideration of any sites for their Replacement Local Development Plan is not a guarantee they will be taken forward and they will be subject to a robust assessment process to determine their suitability or otherwise for allocation;
- There is headroom in the traffic flows used in the traffic modelling that could be taken by any other emerging developments that may emerge either as part of the Replacement Local Development Plan or outside of that plan; and
- Up to date estimates of land uses for the appeal site based upon current market conditions would generate up to -347 fewer vehicle movements per hour than those assessed in the traffic modelling.

2.48 The Transport Assessment has been prepared on a robust basis and mitigation identified accordingly in agreement with VoGC. There have been some traffic related comments to the appeal relating to the inclusion of other developments and traffic data being out of date. The above sets out that other developments have been allowed for in the traffic analyses and that the traffic survey work remains relevant and up to date. Based upon the methodology for preparing the application's transport related documents and the associated considerations above, these comments to the appeal are misconceived.

3 CONCLUSIONS

- 3.1 This Statement has been prepared to consider the third matter to be considered by appeal reference CAS-02641-G8G7M5: **'the effect of the proposed development on traffic movement'**.
- 3.2 The body of my Statement sets out the traffic matters. Highway Officers at VoGC, their appointed independent consultant, Welsh Government and Transport for Wales are in agreement to the assessment methodology, the assessments undertaken, the conclusions and the mitigation.
- 3.3 I have set out that the Transport Assessment has been prepared on a robust basis and mitigation identified accordingly in agreement with VoGC. There have been some comments to the application relating to traffic impact. Based upon the methodology for preparing the application's transport related documents and the associated considerations within the body of my Statement, these are misconceived.

