

Technical Note 01

P/24/0265 Highway Observations Response

Paisley Park, Pant Industrial Estate, Merthyr Tydfil

Document Control

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1 INTRODUCTION

1.1 Context

- 1.1.1 Link Transport Planning previously produced a Transport Statement (reference LTP/2427/TS/01) (hereon referred to as 'TS') dated November 2024 which formed part of the submission documents for planning application P/24/0265.
- 1.1.2 Link Transport Planning was subsequently provided with Highway comments from Merthyr Tydfil County Borough Council (MTCBC) dated 16.12.24, which were received on 07.01.25.
- 1.1.3 This Technical Note provides a response to the Highway comments, referring to previously submitted information and new information as necessary. Technical evidence and reference to applicable planning policy has been supplemented by detailed knowledge and experience of veterinary practice which has been provided to Link Transport Planning from the applicant and intended site operator, Rhian Nicholls ('the applicant').
- 1.1.4 The applicant qualified as a veterinary surgeon from the University of Liverpool in 2013 and has worked exclusively in small animal (companion animal) practice throughout her career. She began her career in a practice with branches in Blackwood and Brynmawr before spending over eight years at a practice in Dowlais, Merthyr Tydfil, which also had a branch in Aberdare. For 6.5 years, she held the position of Clinical Director, gaining extensive experience in clinical operations and practice management.
- 1.1.5 Since December 2023, the applicant has been employed at an independent practice in Llantrisant, assisting in the establishment of a new branch in Caerphilly, which opened in May 2024. The applicant has considerable knowledge of managing veterinary practices, particularly in the Merthyr Tydfil area, and is experienced in addressing the operational and clinical challenges associated with running a veterinary practice.

1.2 Scope

- 1.2.1 The scope of this Technical Note is to consider and respond to the Highway comments and items of concern with a view to finding common ground and a positive conclusion.
- 1.2.2 The format of this Technical Note follows that of the Highway comments, for ease of reference, with the original comment followed with a response and a recommendation.

2 MTCBC HIGHWAY COMMENTS

2.1 Existing/Proposed Access Arrangements

MTCBC Highway Comments

2.1.1 The Highway response states:

'The existing vehicular access into the Industrial Estate is from an unnamed road, which is adopted highway and restricted to 20mph. There is an appropriate level of visibility in either direction when exiting the industrial estate and the access width is to a suitable standard. Unit 1 is accessed from an internal access road which serves all the units within the estate and the car parking associated with the unit is located to the front of the unit. This existing access arrangement is acceptable in highway terms.'

Link Transport Planning Response

2.1.2 There are no items of contention regarding site access, so no further commentary is necessary.

Recommendation

2.1.3 The existing and proposed access arrangements are agreed – no further action is required.

2.2 Parking Provision

MTCBC Highway Comment

'As this is a sui generis site, there are no specific standards set out in the Welsh Parking Standards 2014 that relate to the proposed use of the building. Therefore, the highway authority will consider the proposed parking on its own merit taking into account the scale and the location of the development

As per the submitted document Proposed Site Plan 201, it shows that there are 5no parking spaces (including 1no disabled bay) associated with the proposed development.

As per the submitted document Transport Statement it states "The applicant has advised that there are anticipated to be 1-2 full-time equivalent veterinary surgeons at the site with 4 to 5 support staff on any one day. Typical shift patterns are 4 x 10hour days" and "Visitors are predominantly by appointment only, although there are likely to be less frequent unplanned emergency visits".

Based on the above the highway authority must take into consideration that even though many visitors attend the building based on appointment only, there will be an overlap of appointments due to visitors arriving early and waiting. Therefore, if there are 2no veterinary surgeons working, then there would be 2no visitors assigned to each veterinary surgeon as a minimum (one attending the appointment and one waiting to been seen).

This would mean for 2no surgeons there would be 6no people on site, 2no employees and 4no attending appointments.

With regard to supporting staff, the document does not state what role such staff will be undertaking but such practices often have veterinary nurses who again would require consulting rooms and have clients. Of the five supporting staff, it would be pragmatic to say 2no are nurses (this would equate to all consulting rooms being used as worst-case scenario). 2no nurses would equate to 6no people on site, those in appointment and those waiting as per the surgeons.

Therefore, for the 4no consulting rooms there would be 12no people on site associated with this element, 4no staff and 8no clients.

Then we must consider the 3no ancillary staff, bringing the total number of people on site up to 15 by just considering the consultation rooms. A shortfall of 10 spaces.

However, highways must now also consider the other elements to be undertaken on the site which will bring in additional visitors and who will not necessarily require an appointment, such as the pharmacy, people making appointments, people picking up their dog or cat (either before or after surgery), Visitors attending meetings (large meeting room). All of these elements will mean that additional parking will be required and the shortfall of parking will therefore far exceed 10 spaces.

This hasn't even taken into consideration the operating theatres that could be outsourced to other vets in the area, and thereby increasing visitor numbers.

There will also be a number of deliveries per day although none is specified within the submitted documentation and there has been no delivery management plan submitted within the application. Therefore, it is not clear how deliveries would be managed or indeed how many deliveries will occur on average per day. However, it should be noted that the deliveries to the site will contribute to the parking shortfall. It is also of concern that without parking for delivery vehicles drivers may park inappropriately within the estate and thereby negatively influencing other unit users

Within the submitted document Transport Statement, it states "Parking provision is proposed to remain as per the existing situation, with a five car parking spaces and three cycle stands (for up to six bicycles) to be retained within a wider provision of 37 car parking spaces (plus additional cycle parking) which are contained within the red line boundary of the 'Land at Pant Industrial Estate' planning consent". The submitted plans only show a red line boundary around the application building and the 5no parking spaces associated with the site and not the industrial estate as a whole. The additional 37 parking spaces that have been referenced in the Transport Statement maybe within the industrial estate but they will have been allocated to separate units and not unit 1

Therefore, such parking cannot be taken into consideration when looking at available parking to the application site.

Within the documentation, the applicant has tried to justify the lack of parking by siting the extant use and what the building could be used for. However, the highway authority do not feel that any of the businesses mentioned would require the level of parking that this proposal does. With a shortfall of parking at the outset, there is no scope for expansion of the business and given the nature of the business and its location, visitors are less likely to arrive using alternative modes of transport. Only staff could be encouraged to use public transport, cycle or walk.

In conclusion the highway authority consider that the scheme as put forward does not provide the level of parking required for a business of this scale and certainly does not consider any future expansion of staffing levels. With the shortfall of parking within the site being so high and with

there being no parking restrictions along the adopted highway, in all probability overspill parking will occur both within the site to the detriment of other site users and out onto the local adopted highway. Given the nature of the adjacent businesses whereby many use articulated lorries and other large vehicles accessing their sites, the highway authority believe that any additional vehicles parking on the adopted highway will have a detrimental impact on the existing highway network such that it will cause a highway safety concern.

Therefore, the highway authority recommend refusal of the planning application based on the lack of parking associated with the proposed development.'

Link Transport Planning Response

2.2.1 There is concern with the overly robust methodology applied to the calculations used in the Highway observations and the disregard given to the TRICS based parking assessment provided in the original Transport Statement. These concerns are discussed in turn below.

2.2.2 The Highway response states that:

'As this is a sui generis site, there are no specific standards set out in the Welsh Parking Standards 2014 that relate to the proposed use of the building. Therefore, the highway authority will consider the proposed parking on its own merit taking into account the scale and the location of the development.'

2.2.3 However, as well as the scale and location of the development, there is no reference to the sustainable transport policy and legislation that underpins the planning process, which is documented in Chapter 2 of the Transport Statement. Key considerations that are not apparent in the Highway response and must be considered by the Planning Authority include:

1. Priority 1 of the Wales Transport Strategy (2021) is to bring services to people in order to reduce the need to travel. Priority 2 of the Strategy is to allow people and goods to move easily from door to door by accessible, sustainable and efficient transport services and infrastructure. The proposal is compliant with these.
2. Priority 3 of the Wales Transport Strategy (2021) is to encourage people to make the change to more sustainable transport. The apparent strategy of the Highway comments to 'predict and provide' is in direct contrast with national policy aspiration.
3. Planning Policy Wales – Edition 12 (Welsh Government, 2024) sets out a clear user hierarchy, with walking, cycling and public transport access all to be prioritised about private motor cars.
4. PPW states (emphasis added by Link Transport Planning) that:

'Car parking provision is a major influence on how people choose to travel' and the pattern of development. Where and how cars are parked can in turn be a major factor in the quality of a place.'

'A design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which **does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of**

reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed. The needs of disabled people must be recognised and adequate parking provided for them.’

‘...Parking standards should be applied flexibly and **allow for the provision of lower levels of parking** and the creation of high quality places.’

5. Policy SW12 of the Merthyr Tydfil RLDP 2016-2031 states that:

‘Development proposals will be expected to demonstrate how they reduce the need to travel and encourage the use of sustainable transport...

Recognition of the Transport Hierarchy and national policy that aims to reduce the need to travel, particularly by private motor vehicles, by supporting healthy and sustainable transport options and encourage a modal shift’

- 2.2.4 The Highway comments state that:

‘there will be an overlap of appointments due to visitors arriving early and waiting...there would be 2no visitors assigned to each veterinary surgeon as a minimum (one attending the appointment and one waiting to be seen)...This would mean for 2no surgeons there would be 6no people on site, 2no employees and 4no attending appointments.’

- 2.2.5 However, not every staff member or appointment requires a car to be parked on-site; the submitted TRICS data confirms a more realistic scenario, based on actual site operations rather than a theoretical worst-case scenario, that five parking spaces are sufficient.

- 2.2.6 The Highway comments state that:

‘...the document does not state what role such staff will be undertaking but such practices often have veterinary nurses who again would require consulting rooms and have clients. Of the five supporting staff, it would be pragmatic to say 2no are nurses (this would equate to all consulting rooms being used as worst-case scenario). 2no nurses would equate to 6no people on site, those in appointment and those waiting as per the surgeons.

Therefore, for the 4no consulting rooms there would be 12no people on site associated with this element, 4no staff and 8no clients.

Then we must consider the 3no ancillary staff, bringing the total number of people on site up to 15 by just considering the consultation rooms. A shortfall of 10 spaces.’

- 2.2.7 This comment is disputed. The client has advised that:

‘With regards to the comments of 2 nurses and 2 vets consulting all at the same time, this is not how it works. 2 nurses are required to support 2 vets. They would not be consulting at the same time as the vets as they are required to nurse/monitor/medicate inpatients, order stock, perform testing on in-house samples, restrain patients for the vets, monitor anaesthetics while vets perform operations.’

2.2.8 Furthermore, as not every staff member or appointment requires a car to be parked on-site, the suggestion that there is a shortfall of 10 spaces is strongly disputed and is not supported by evidence. The submitted TRICS data confirms a more realistic scenario that five parking spaces are sufficient and that the clear direction of the transport planning policy is to restrict excessive car parking provision as a means of encouraging sustainable travel patterns.

2.2.9 The Highway comments state:

'...highways must now also consider the other elements to be undertaken on the site which will bring in additional visitors and who will not necessarily require an appointment, such as the pharmacy, people making appointments, people picking up their dog or cat (either before or after surgery), Visitors attending meetings (large meeting room). All of these elements will mean that additional parking will be required and the shortfall of parking will therefore far exceed 10 spaces.'

2.2.10 This comment is disputed. The Highway comments appear to have assessed the proposal based on the operations of a large, multi-use, franchised veterinary centre, rather than the small-scale family veterinary practice that is proposed. The TS has sought to avoid incompatible comparisons through use of the industry standard TRICS database, which enables traffic forecasts based on actual veterinary surgery sites and which are scalable to the proposals. This has demonstrated that five spaces are suitable for the modest scale of the application site.

2.2.11 To further justify the TRICS modal split outputs, a population catchment analysis has been undertaken using the isochrones presented in the Transport Statement.

2.2.12 The analysis utilises population weighted centroids based on Lower Super Output Areas (LSOAs), as provided by the Office for National Statistics (ONS). This methodology estimates the population within each isochrone by taking the mathematical population centre of the lowest level administrative areas available. The most recent mid-year 2022 population estimates were used, ensuring the data reflects up-to-date population distributions.

2.2.13 This exercise identifies that there is a population catchment to the site of:

- 22,937 people within the recommended active travel act walking distance (2 miles).
- 46,011 people within the recommended active travel act cycling distance (5 miles).
- 80,745 people within a 60-minute public transport journey.

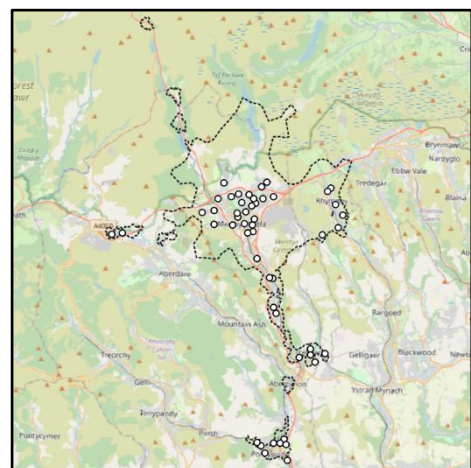


Figure 1: Example of Population centroids within the merged isochrone layers

2.2.14 As of 2024, the United Kingdom has an estimated pet population of approximately 36 million, with 60% of households (17.2 million) owning at least one pet. Given the UK's human population of around 67 million, this equates to approximately 0.54 pets per person. This includes an estimated 13.5 million dogs (approximately 0.20 dogs per person) and 12.5 million cats (approximately 0.19 cats per person)¹. Based on the population data, it is evident that there is a significant catchment of pets that can travel to the site without requiring a car parking space.

2.2.15 The Highway comments state:

This hasn't even taken into consideration the operating theatres that could be outsourced to other vets in the area, and thereby increasing visitor numbers.'

2.2.16 However, the applicant has also confirmed that:

'outsourcing of operating theatres to other vets is not how veterinary works. Employees work in theatres operating when they are not consulting. Even if more surgeries were performed, operating takes a lot of preparation time, surgical time and recovery time as well as cleaning down between ops. There are only so many procedures you can do in a day in a theatre and the footfall relating to an operating theatre is low.'

2.2.17 The Highway comments state:

'There will also be a number of deliveries per day although none is specified within the submitted documentation and there has been no delivery management plan submitted within the application. Therefore, it is not clear how deliveries would be managed or indeed how many deliveries will occur on average per day. However, it should be noted that the deliveries to the site will contribute to the parking shortfall. It is also of concern that without parking for delivery vehicles drivers may park inappropriately within the estate and thereby negatively influencing other unit users'

2.2.18 It is acknowledged that there will be deliveries to the site, but it is highly unlikely that delivery operations would exceed those permitted under the extant consent, as stated in the submitted Transport Statement. There is no reason to reassess the suitability of the approved site layout for a modest change of use application such as this. Even so, to help expedite a positive resolution, the TRICS database has been re-interrogated to review potential servicing vehicles for sites of this scale and nature. The Full TRICS output is included in **Appendix A** and a summary of the outputs is provided in the follow paragraphs.

¹ Source: www.ukpetfood.org

2.2.19 The following table provides a summary of the 'servicing vehicles' trip rate for a veterinary surgery, along with the resultant trip generation and an estimated accumulation value.

Time	Trip Rate		Trip Generation		Accumulation
	Arr	Dep	Arr	Dep	-
06:00-07:00	0	0	0	0	0
07:00-08:00	0	0	0	0	0
08:00-09:00	0	0	0	0	0
09:00-10:00	0	0	0	0	0
10:00-11:00	0.143	0.143	0	0	0
11:00-12:00	0	0	0	0	0
12:00-13:00	0.071	0.071	0	0	0
13:00-14:00	0.143	0.143	0	0	0
14:00-15:00	0.071	0.071	0	0	0
15:00-16:00	0.071	0.071	0	0	0
16:00-17:00	0	0	0	0	0
17:00-18:00	0	0	0	0	0
18:00-19:00	0	0	0	0	0
19:00-20:00	0	0	0	0	0
Total	0.499	0.499	1	1	N/A

2.2.20 As shown, the number of servicing vehicle trips for small family vets such as this is negligible, with an average of just one per day. This is considered a highly robust scenario, as the veterinary surgeries in the TRICS outputs comprise far larger operations, which are more likely to have a greater range of services and, therefore, deliveries from different suppliers.

2.2.21 It would be highly unreasonable to suggest that a single delivery vehicle to the site per day would be any more onerous than the existing consent, especially given that the site could operate as several uses that could require frequent servicing by max. legal 16.5m articulated lorries. Furthermore, the applicant has verified the TRICS outputs and provided the following operational detail insights:

'laboratory submissions are collected by couriers from lock boxes and take place outside of opening hours. There is usually one delivery per day from one main supplier. A visit from the crematorium services tends to be once weekly. Both of these happen during opening hours and tend to be quick visits. Occasional deliveries from other suppliers may take place but are much less frequent.'

2.2.22 Therefore, it is concluded that deliveries will be infrequent, swift and would often use the site frontage either outside of customer hours, or with minor inconvenience to customers who are parking the bays and may not be able to exit until the delivery is complete, or the vehicle operator moves to facilitate egress. The conclusion is that the proposed delivery situation will not have an adverse impact on highway safety risk when compared to the extant planning consent.

2.2.23 The Highway comments state:

'Within the submitted document Transport Statement, it states "Parking provision is proposed to remain as per the existing situation, with a five car parking spaces and three cycle stands (for up to six bicycles) to be retained within a wider provision of 37 car parking spaces (plus additional cycle parking) which are contained within the red line boundary of the 'Land at Pant Industrial Estate' planning consent". The submitted plans only show a red line boundary around the application building and the 5no parking spaces associated with the site and not the industrial estate as a whole. The additional 37 parking spaces that have been referenced in the Transport Statement maybe within the industrial estate but they will have been allocated to separate units and not unit 1 Therefore, such parking cannot be taken into consideration when looking at available parking to the application site.'

2.2.24 The TS states that the total wider site provision is 37 spaces, and the current application site has five dedicated spaces. Whilst there is no requirement for further parking spaces, as evidenced in the TS TRICS assessment and unequivocally mandated by planning policy on modal shift, it is not uncommon for businesses to share parking spaces and for spaces to be reallocated by the site management company based on dynamic demand as uses and operators change and it is considered appropriate to take this into account when assessing the site.

2.2.25 The TS also confirms that there are numerous safe parking and 'drop-off' opportunities available on the surrounding industrial estate access roads. Whilst there is evidence of parking on the public highway, it is likely that many of these vehicles are parked there for convenience rather than necessity, as historical satellite imagery for the wider industrial estate (as well as several similar estates elsewhere in the county borough) highlights that there are large expanses of unused hardstanding dominating the area (highlighting the importance of restricted car parking policy on efficient land use in the planning system).

2.2.26 The Highway comments state:

'Within the documentation, the applicant has tried to justify the lack of parking by citing the extant use and what the building could be used for. However, the highway authority do not feel that any of the businesses mentioned would require the level of parking that this proposal does. With a shortfall of parking at the outset, there is no scope for expansion of the business and given the nature of the business and its location, visitors are less likely to arrive using alternative modes of transport. Only staff could be encouraged to use public transport, cycle or walk.'

2.2.27 This statement is disputed. The TS has clearly demonstrated using the industry-standard TRICS database that there is not a lack of parking associated with the proposal. Furthermore, the applicant has confirmed from her extensive industry experience that patients and their pets are frequently observed using sustainable modes of transport, or being 'dropped off' or collected before and after appointments.

2.2.28 However, with the intention of facilitating a swift and positive resolution, the TS has highlighted to the Council that the consented land use of the application site can facilitate a wide range of operations that would generate traffic demand far in excess of the modest family vets that is being proposed.

2.2.29 To reiterate what is stated in the submitted TS, the evidence-led approach for estimated parking demand at the proposed veterinary surgery is based on actual traffic surveys of veterinary surgeries, as provided by the industry standard TRICS database. **This evidence-led approach confirms that the proposed five parking spaces is sufficient for the proposed use.** The TS then highlights that the extant use allows for a variety of B1/B2/B8 operations, including highly technical industry, builders' merchants, offices and call centres. The Council's own adopted parking standards confirm that for such uses, **up to 33 parking spaces would be required for the extant land use.** If the same 'worst-case' assumptions were applied to the potential B1/B2/B8 operations, the theoretical car parking demand would likely exceed even that figure.

2.2.30 The Highway comments state:

'In conclusion the highway authority consider that the scheme as put forward does not provide the level of parking required for a business of this scale and certainly does not consider any future expansion of staffing levels. With the shortfall of parking within the site being so high and with there being no parking restrictions along the adopted highway, in all probability overspill parking will occur both within the site to the detriment of other site users and out onto the local adopted highway. Given the nature of the adjacent businesses whereby many use articulated lorries and other large vehicles accessing their sites, the highway authority believe that any additional vehicles parking on the adopted highway will have a detrimental impact on the existing highway network such that it will cause a highway safety concern.'

2.2.31 The Highway Authority conclusion is inconsistent with the evidence presented for the reasons set out in this response. In particular, the assumptions made by the Highway response assume an unrealistic level of car use and parking demand, which is contrary to the evidence-led approach used in the submitted Transport Statement. Furthermore, the applicant, who has significant experience in the industry, has confirmed that client use of taxis, sustainable modes of transport and car pick-up and drop-off trips are commonplace when clients travel with pets.

2.2.32 The future expansion of staff (i.e. an increase in the number of veterinary surgeons) would require changes to the approved building layout, which can be regulated with an appropriately worded planning condition. Therefore, any material change in site operations would need to be assessed by the authority at that time and is not a material consideration for this application.

2.2.33 **The proposed level of parking has been clearly demonstrated to be sufficient for the proposed use.** Furthermore, it has been clearly demonstrated, using the Council's own adopted standards, that **the proposal will, in fact, reduce parking demand at the wider site and public highway network with due consideration of the extant planning use.** This is a highly material consideration and is indisputable.

2.2.34 Regardless of the above, there is no evidence to suggest that additional vehicles parking on the adopted highway would have a detrimental impact on the existing highway network or would cause a highway safety concern. There are currently vehicles parking on the adopted highway network (assumed to be for convenience, given the numerous empty parking spaces on the wider site) and the TS confirms that the existing highway safety record is excellent. If there were highway safety concerns due to overspill, then the Highway Authority would have implemented traffic orders as part of original 'Land at Pant Industrial Estate' planning consent (red P/20/0109).

2.3 Trip Generation

MTCBC Highway Comments

'The methodology set out in the submitted document Transport Statement is acceptable and the highway authority have no concerns with the effect on the local adopted highway.'

Link Transport Planning Response

2.3.1 There are no items of contention regarding site access, so no further commentary is necessary.

Recommendation

2.3.2 The trip generation conclusions are agreed upon – no further action is required.

2.4 Cycle Parking

MTCBC Highway Comments

'As per the submitted plan, Proposed Site Plan 201 it states that the existing cycle parking arrangement of six cycle spaces is to be retained, which is acceptable.'

Link Transport Planning Response

2.4.1 There are no items of contention regarding site access, so no further commentary is necessary.

Recommendation

2.4.2 The cycle parking provision conclusions are agreed upon – no further action is required.

2.5 Active Travel / Sustainability

MTCBC Highway Comments

'There is a good footway link to the indicative front entrance of the building, the footways within the surrounding area are approximately 2.2m, these existing conditions are deemed acceptable. Pedestrians can access the proposed development via the local public transport network. There are 2no bus stops located at the main road that runs through Pant Industrial Estate, approximately 250m from the proposed development.'

Link Transport Planning Response

- 2.5.1 There are no items of contention regarding active travel and sustainability, so no further commentary is necessary.

Recommendation

- 2.5.2 The sustainable transport connectivity conclusions are agreed upon – no further action is required

2.6 Accident Data

MTCBC Highway Comments

'Accident Data has been interrogated and it concludes that there has been no accidents recorded along the unnamed road adjacent to the proposed application site in the last five years. Indeed, there appears to be no local cluster areas within the search area.'

Link Transport Planning Response

- 2.6.1 There are no items of contention regarding accident data, so no further commentary is necessary.

Recommendation

- 2.6.2 The accident data conclusions are agreed upon – no further action is required.

2.7 SAB

MTCBC Highway Comments

'All proposals for surface water drainage must meet adhere to Welsh Governments "Statutory standards for sustainable drainage systems – designing, constructing, operating and maintaining surface water drainage systems". Approval of surface water drainage proposals must be sought from MTCBC SAB prior to commencement on site. The applicant is advised to see advice as soon as possible'

Link Transport Planning Response

- 2.7.1 There are no proposed changes associated with the proposal that are likely to affect SuDS.

Recommendation

- 2.7.2 No further action is required.

3 SUMMARY AND CONCLUSION

3.1 Summary

- 3.1.1 Overall, the Highway comments place disproportionate emphasis on facilitating private motor vehicles. The conclusion that there is insufficient parking to accommodate an unrealistic scenario of all potential staff and visitors travelling by car and parking at the site, despite the TS presenting survey evidence from the industry standard TRICS database that it is not required, appears to promote an approach that is not supported by the adopted transport planning policy.
- 3.1.2 The applicant has also confirmed that the modal split assumptions from the TRICS database are in line with her extensive industry experience. The Highway authority assumptions of all trips being made by private car and seeking to park on-site are therefore unrealistic.
- 3.1.3 A population catchment analysis has been undertaken using the isochrones presented in the Transport Statement. This identifies that there is a population catchment to the site of:
- 22,937 people within the recommended active travel act walking distance.
 - 46,011 people within the recommended active travel act cycling distance.
 - 80,745 people within a 60-minute public transport journey.
- 3.1.4 As of 2024, the United Kingdom has an estimated pet population of approximately 36 million, with 60% of households (17.2 million) owning at least one pet. Given the UK's human population of around 67 million, this equates to approximately 0.54 pets per person. This includes an estimated 13.5 million dogs (approximately 0.20 dogs per person) and 12.5 million cats (approximately 0.19 cats per person). Based on the population data, it is evident that there is a significant catchment of pet owners who can travel to the site without requiring a car parking space.
- 3.1.5 It is well established in the transport planning industry that parking demand is not a fixed number. If more parking spaces are provided, it will make car use more convenient and therefore encourage it, which is directly contrary to the transport planning policy. The TS has presented evidence to show that, based on actual veterinary practice surveys, the proposed level of parking is suitable. It is also reasonable to conclude that any temporary overspill, which is equally possible, or in fact more likely, under the existing planning consent, will be absorbed by users seeking alternative modes of travel, being dropped off/collected by a vehicle that will park away from the site, or by finding a safe and legal parking space on public highway within the wider industrial estate. In reality, it is also likely that the various business uses on the estate will share unutilised parking spaces in a pragmatic manner.

3.2 Conclusion

- 3.2.1 The evidence presented demonstrates that there are no material highway transportation reasons why this proposal should not proceed, as it is appropriate in scale for the location. There is no evidence to support a view that it would have a material impact on highway safety or operation.
- 3.2.2 The detailed Highway Authority comments are welcomed and have been fully considered. However, having comprehensively addressed all outstanding matters of concern in this Technical Note, the Highway Authority is respectfully urged to reconsider the application with reference to the additional information provided to facilitate a positive resolution to bring the site into beneficial use.
- 3.2.3 If deemed necessary, the applicant is prepared to accept appropriately worded conditions to alleviate any residual concerns, such as requirements for a delivery management plan, restrictions on amending the approved site layout, or a travel plan to further encourage modal shift.
- 3.2.4 If the Highway Authority does not provide robust evidence to the contrary, the Planning Authority are urged to review the submitted Transport Statement and this Technical Note in detail and to make its own balanced deliberations.

Appendix A

TRICS – Servicing Vehicles (Vets)

Calculation Reference: AUDIT-118301-250117-0155

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 05 - HEALTH
Category : M - VETERINARY SURGERY
TOTAL VEHICLES

<u>Selected regions and areas:</u>		
03	SOUTH WEST	
	WL WILTSHIRE	1 days
11	SCOTLAND	
	LO WEST Lothian	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: Number of surgeons
 Actual Range: 5 to 9 (units:)
 Range Selected by User: 1 to 13 (units:)

Parking Spaces Range: All Surveys Included

Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/00 to 19/11/21

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

Selected survey days:

Tuesday 1 days
 Wednesday 1 days

This data displays the number of selected surveys by day of the week.

Selected survey types:

Manual count 2 days
 Directional ATC Count 0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaken using machines.

Selected Locations:

Edge of Town 2

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

Selected Location Sub Categories:

Residential Zone 2

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included 2 days - Selected
 Servicing vehicles Excluded 4 days - Not Selected

Secondary Filtering selection:**Use Class:**

E(e) 2 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

Population within 500m Range:

All Surveys Included

Population within 1 mile:

5,001 to 10,000 1 days
 20,001 to 25,000 1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

Secondary Filtering selection (Cont.):

Population within 5 miles:

50,001 to 75,000

2 days

This data displays the number of selected surveys within stated 5-mile radii of population.

Car ownership within 5 miles:

1.1 to 1.5

2 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

Travel Plan:

No

2 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

PTAL Rating:

No PTAL Present

2 days

This data displays the number of selected surveys with PTAL Ratings.

Covid-19 Restrictions

Yes

At least one survey within the selected data set was undertaken at a time of Covid-19 restrictions

LIST OF SITES relevant to selection parameters

1	LO-05-M-01 BANKTON SQUARE LIVINGSTON	VETERINARY SURGERY	WEST LOTHIAN
	Edge of Town Residential Zone		
	Total Number of surgeons:	9	
	Survey date: TUESDAY	08/06/21	Survey Type: MANUAL
2	WL-05-M-01 STRATFORD ROAD SALISBURY	VETERINARY SURGERY	WILTSHIRE
	Edge of Town Residential Zone		
	Total Number of surgeons:	5	
	Survey date: WEDNESDAY	17/11/21	Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY

TOTAL VEHICLES

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00	1	9	0.111	1	9	0.000	1	9	0.111
07:00 - 08:00	2	7	0.929	2	7	0.000	2	7	0.929
08:00 - 09:00	2	7	2.214	2	7	0.786	2	7	3.000
09:00 - 10:00	2	7	1.143	2	7	1.643	2	7	2.786
10:00 - 11:00	2	7	1.571	2	7	1.143	2	7	2.714
11:00 - 12:00	2	7	1.214	2	7	0.929	2	7	2.143
12:00 - 13:00	2	7	1.714	2	7	1.857	2	7	3.571
13:00 - 14:00	2	7	2.429	2	7	2.429	2	7	4.858
14:00 - 15:00	2	7	2.143	2	7	2.357	2	7	4.500
15:00 - 16:00	2	7	1.857	2	7	2.429	2	7	4.286
16:00 - 17:00	2	7	0.929	2	7	1.786	2	7	2.715
17:00 - 18:00	2	7	1.500	2	7	1.143	2	7	2.643
18:00 - 19:00	2	7	0.929	2	7	1.571	2	7	2.500
19:00 - 20:00	1	9	0.111	1	9	0.889	1	9	1.000
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			18.794			18.962			37.756

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

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Parameter summary

Trip rate parameter range selected:	5 - 9 (units:)
Survey date range:	01/01/00 - 19/11/21
Number of weekdays (Monday-Friday):	2
Number of Saturdays:	0
Number of Sundays:	0
Surveys automatically removed from selection:	0
Surveys manually removed from selection:	0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are shown. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY

OGVS

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00	1	9	0.000	1	9	0.000	1	9	0.000
07:00 - 08:00	2	7	0.000	2	7	0.000	2	7	0.000
08:00 - 09:00	2	7	0.000	2	7	0.000	2	7	0.000
09:00 - 10:00	2	7	0.000	2	7	0.000	2	7	0.000
10:00 - 11:00	2	7	0.000	2	7	0.000	2	7	0.000
11:00 - 12:00	2	7	0.000	2	7	0.000	2	7	0.000
12:00 - 13:00	2	7	0.000	2	7	0.000	2	7	0.000
13:00 - 14:00	2	7	0.071	2	7	0.071	2	7	0.142
14:00 - 15:00	2	7	0.000	2	7	0.000	2	7	0.000
15:00 - 16:00	2	7	0.000	2	7	0.000	2	7	0.000
16:00 - 17:00	2	7	0.000	2	7	0.000	2	7	0.000
17:00 - 18:00	2	7	0.000	2	7	0.000	2	7	0.000
18:00 - 19:00	2	7	0.000	2	7	0.000	2	7	0.000
19:00 - 20:00	1	9	0.000	1	9	0.000	1	9	0.000
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.071			0.071			0.142

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY

CARS

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00	1	9	0.111	1	9	0.000	1	9	0.111
07:00 - 08:00	2	7	0.929	2	7	0.000	2	7	0.929
08:00 - 09:00	2	7	2.214	2	7	0.786	2	7	3.000
09:00 - 10:00	2	7	1.071	2	7	1.643	2	7	2.714
10:00 - 11:00	2	7	1.500	2	7	1.000	2	7	2.500
11:00 - 12:00	2	7	1.214	2	7	0.929	2	7	2.143
12:00 - 13:00	2	7	1.643	2	7	1.786	2	7	3.429
13:00 - 14:00	2	7	2.286	2	7	2.286	2	7	4.572
14:00 - 15:00	2	7	2.000	2	7	2.214	2	7	4.214
15:00 - 16:00	2	7	1.786	2	7	2.357	2	7	4.143
16:00 - 17:00	2	7	0.857	2	7	1.714	2	7	2.571
17:00 - 18:00	2	7	1.500	2	7	1.071	2	7	2.571
18:00 - 19:00	2	7	0.929	2	7	1.571	2	7	2.500
19:00 - 20:00	1	9	0.111	1	9	0.889	1	9	1.000
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			18.151			18.246			36.397

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.

TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY

LGVS

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00	1	9	0.000	1	9	0.000	1	9	0.000
07:00 - 08:00	2	7	0.000	2	7	0.000	2	7	0.000
08:00 - 09:00	2	7	0.000	2	7	0.000	2	7	0.000
09:00 - 10:00	2	7	0.071	2	7	0.000	2	7	0.071
10:00 - 11:00	2	7	0.071	2	7	0.143	2	7	0.214
11:00 - 12:00	2	7	0.000	2	7	0.000	2	7	0.000
12:00 - 13:00	2	7	0.071	2	7	0.071	2	7	0.142
13:00 - 14:00	2	7	0.071	2	7	0.071	2	7	0.142
14:00 - 15:00	2	7	0.143	2	7	0.143	2	7	0.286
15:00 - 16:00	2	7	0.071	2	7	0.071	2	7	0.142
16:00 - 17:00	2	7	0.071	2	7	0.071	2	7	0.142
17:00 - 18:00	2	7	0.000	2	7	0.071	2	7	0.071
18:00 - 19:00	2	7	0.000	2	7	0.000	2	7	0.000
19:00 - 20:00	1	9	0.000	1	9	0.000	1	9	0.000
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.569			0.641			1.210

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

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TRIP RATE for Land Use 05 - HEALTH/M - VETERINARY SURGERY

Servicing Vehicles

Calculation factor: 1 SURGNS

BOLD print indicates peak (busiest) period

Time Range	ARRIVALS			DEPARTURES			TOTALS		
	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate	No. Days	Ave. SURGNS	Trip Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00	1	9	0.000	1	9	0.000	1	9	0.000
07:00 - 08:00	2	7	0.000	2	7	0.000	2	7	0.000
08:00 - 09:00	2	7	0.000	2	7	0.000	2	7	0.000
09:00 - 10:00	2	7	0.000	2	7	0.000	2	7	0.000
10:00 - 11:00	2	7	0.143	2	7	0.143	2	7	0.286
11:00 - 12:00	2	7	0.000	2	7	0.000	2	7	0.000
12:00 - 13:00	2	7	0.071	2	7	0.071	2	7	0.142
13:00 - 14:00	2	7	0.143	2	7	0.143	2	7	0.286
14:00 - 15:00	2	7	0.071	2	7	0.071	2	7	0.142
15:00 - 16:00	2	7	0.071	2	7	0.071	2	7	0.142
16:00 - 17:00	2	7	0.000	2	7	0.000	2	7	0.000
17:00 - 18:00	2	7	0.000	2	7	0.000	2	7	0.000
18:00 - 19:00	2	7	0.000	2	7	0.000	2	7	0.000
19:00 - 20:00	1	9	0.000	1	9	0.000	1	9	0.000
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			0.499			0.499			0.998

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: $COUNT/TRP*FACT$. Trip rates are then rounded to 3 decimal places.