Comments regarding appeal APP/Z3825/W/24/3357838

In reading this objection to the appeal it is key do to so along with the refused application DC/24/1452.

DC/24/1452 is the full application that was submitted for The Range after DC/24/0726 was refused by HDC.

DC/24/1452 brings out important details of the application that are were not included in DC/24/0726. The appealant is stating multiple times in their appeal statement that the applications are not material change of use.

A ***material change of use*** refers to a change in the way a property or land is used that is significant enough to affect the surrounding environment, public amenities, or the character of the area. The ***Town and Country Planning Act 1990*** defines a material change of use as any change in the use of a building or land that may affect local amenities, including parking, noise levels, and traffic.

The proposed Range store is a material change of use as summarised below.

1. The applicant is stating that the location of the Range (bulk retail outlet) is in the centre of a primary catchment area that has a population on 131,000 people. This will therefore generate significantly more traffic, parking, and associated noise levels to the current permitted use of light industrial. These contribute to material changes of use.
2. A key refusal reason on DC/24/1452 as stated by HDC is “significant scale and very broad retail offer of the proposal would result in a significant adverse impact on the vitality and viability of Billingshurst town centre”. This is a change affecting local amenities and is hence a material change of use.
3. In DC/24/1452 the applicant states that as the main Range store there will be addition of extra facilities including garden centre and coffee shop. These facilities are deemed material change of use.
4. The appealant has stated in their a water neutrality submission for DC/24/1452 that employment numbers have reduced from 81 on the current consented industrial use to 33 for Retail use. That is a significant reduction on employment numbers and hence a material change of use.

On the first point of traffic on DC/24/0726 the WSCC Highways did not object of the move of unit 18 from light industrial/distribution/storage to high volume large scale Retail superstore. They stated "From the submitted information, it's understood that the use of the permitted units falls within use Class E. As such, it is permitted development for occupiers to operate and change between any uses permitted with use Class E.

They totally missed the fact that high volume large scale Retail superstore, which is what The Range is, will generate significantly more trips that current allowed use. These trips will not be just from the immediate area but will also bring many people from a far reaching area to the trade park. In DC/24/1452 the applicant goes on the stating the primary catchment areas which has a population of 131k people. It is incredulous and beyond belief that WSCC Highways think the light industrial/distribution/storage and high volume large scale Retail superstore will generate the same volume of traffic. They have done the public dis-service

with their shoddy assessment. This is not the first time WSCC Highway have conducted a poor to no assessment of units at the trade park included the denied McDonalds application. With the Lidl, Morrisons, Costa, Greggs, PFS and trade counters, along the the allowed business park DC/23/2103 that uses the same road network, no proper all emcompassing assessment has been conducted. We are sleepwalking into massive traffic congestion and pollution just outside Billingshurst.

When the full application for the Range DC/24/1452 was submitted WSCC Highways repeated their poor performance. Appendix 1 details the formal complaint I made to HDC which details this poor performance.

DC/24/1452 went to a HDC planning committee meeting in Feb 2025. HDC proposed rejecting for the following reasons.

- The proposed development would lead to the loss of employment floorspace within an existing employment area. It has not been demonstrated that the site is not needed or is not viable for employment use therefore the proposal for retail use of the site would undermine the delivery of planned for employment floorspace and employment opportunities within the district in conflict with policies 2, 7 and 9 of the Horsham District Planning Framework (2015)
- It has not been demonstrated that there are no sequentially preferrable sites reasonably available within town centre or edge of centre locations within the proposal's catchment area for the proposed retail use. Furthermore, the significant scale and very broad retail offer of the proposal would result in a significant adverse impact on the vitality and viability of Billingshurst town centre and would undermine the district's retail hierarchy which promotes Horsham Town and the Broadbridge Heath Quadrant as the primary retail centre for the district, contrary to the provisions of policies 2, 12 and 13 Horsham District Planning Framework (2015), and paragraph 95 of the NPPF (2024).
- The proposed development fails to secure the off-site delivery and ongoing monitoring of the statutory Biodiversity Net Gain for a period of 30 years by way of an appropriate legal agreement. Therefore, the proposal would not be in accordance with Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021).

I submitted and then presented appendix 2 to the planning committee resulting in them voting to include a further refusal reason.

- It has not been demonstrated that the proposed development would not have a severe residual cumulative impact on the road network following mitigation, contrary to para 116 of the NPPF (2024)

The appealant will likely attempt to place weight on the statement from Billingshurst Parish Council. I would suggest you disregard the Parish Council comment. I attended their meeting when they assessed the Range. 3 of the 4 parish councillors made comments of support based on their personal desire for such a store. Hence this not representative of the view of the wider community. It is personal views and hence should be read as such.

Appendix 1

Formal Complaint to Horsham District Council on DC/24/1452

SUMMARY

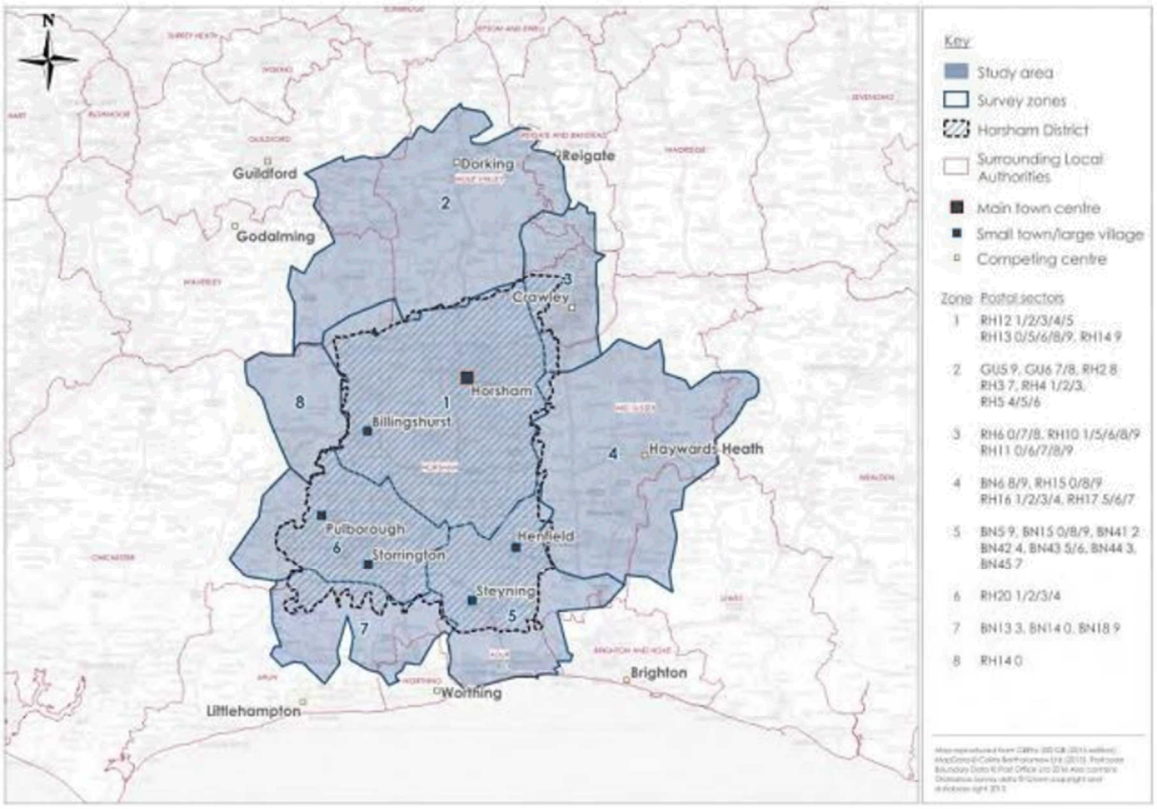
This complaint relates to the repeated poor performance of WSCC Highways in their assessment of the vehicle trips that the proposed Range store at the Billingshurst Trade Park will generate in relation to applications DC/24/1452. Furthermore this complaint highlight the same repeated poor performance in relation to WSCC Highways on other applications on the Billinghurst Trade Park – namely The Lidl (approved) and McDonalds (withdrawn).

The reason that a formal complaint is now being made is because The Range will result in the Billingshurst Trade Park moving from a trade park serving customers mainly from the local areas surrounding Billingshurst to a retail park serving a primary catchment areas that has a population of over 131,000. If not properly and thoroughly assessed this will lead to massive traffic congestion, air pollution, over-crowded carparks and potential accidents.

To resolve this complaint HDC should execute on the following actions on application DC/24/1452.

- Demand that Dunmoore submit onto the planning portal the input assumptions for the TRICS database and the detailed outputs include reference sites.
- Ensure that TRICS best practice is followed by WSCC Highway or an independent body to validate and correct the input assumptions.
- Work through in detail the flawed assumptions that Dunmoore are applying to take the TRICS output and reduce the trip volumes. Obtain independent views on the assumptions and publish these views on the planning portal
- Conduct a full traffic assessment of the trade park and other developments (DC/23/2103) that will use the trade park road network taking real life data from current operations and then scaling up to include Dunmoore's desire for The Range, M&S and the additional supermarket on plots 1, 2a, 2b. Apply the modelling to impact on wider road network and the trade park roundabout to validate whether they can cope.
- Ask Dunmoore to obtain from The Range in confidence the business case for the store. This will include average customer footfall. This can be compared with fully independently validated trip volumes for further checking. If Dunmoore refuse to obtain therein lies further verification of their attempts to mislead with low trip volumes.

The applicant, Dunmoore is applying for a large scale Retail outlet (The Range) on the outskirts of Billinghurst. As stated by Dunmoore in their application DC/24/1452 the location has been selected as it is geographically central to the Primary Catchment Area of zones 1, 6 and 8 as published in the Horsham Town Retail and Leisure Study' (2017) (see below).



Horsham Town Retail and Leisure Study' (2017)

The study states these zones have a combined population of 131,000 in 2021 growing to 135,000 in 2026.

That population should have alerted WSCC Highways to conducted a full and proper assessment of the vehicle trips that would be generated. Instead they have taken on face value the Transport Assessment submitted by the applicant, Dunmoore. WSCC have taken on face value that

> ***"The Range will generate fewer trips than the consented use (light industrial/storage) during the morning peak hour. In the evening peak hour there would be circa 26 additional two-way vehicle trips."***

It is beyond belief that a population of over 131,000 will only create 26 additional trips at evening peak hours yet WSCC Highways have blindly accepted Dunmoore's statement with zero validation.

WSCC Highways have not conducted any independent validation or followed published documented best practice or taken heed of any aspects of the objection below. WSCC Highways on 30/10/24 posted their response stating "No Objection".

WSCC Highways have failed in their duty.

Dunmoore conducted a TRICS assessment to calculate vehicle trips. The TRICS Best Practice Guidance 2021 states

- "TRICS® is a very flexible system providing a large amount of survey data across a wide range of development types, therefore allowing great potential variation in the

calculation of both vehicular and multi-modal trip rates. Therefore, it is quite possible that two users of the system, applying different filtering criteria and ranges to a task, may end up producing different results. This guide is intended to assist users in ensuring that correct procedures and understanding of the system are practised in the production of trip rate calculations, and is also intended to provide guidance to assist in the correct and thorough auditing of TRICS® data once it is received by third parties.

- There are many areas within the system whereby careful selection criteria and ranges are important in achieving robust and reliable trip rates. This guidance is designed to assist users in this task.
- The correct way to build a selection of surveys for the purposes of calculating trip rates is to decide initial inclusion criteria, and then filter the database using the various options provided by the system to provide a representative sample. The incorrect method is to produce trip rates to fit a pre-determined and preferred trip rate figure. This guidance, if followed correctly, will assist users in avoiding such incorrect, "pre-determined" methods.
- Recipients of data generated by TRICS® need assurance that the data has been produced in accordance with the guidance contained within this document. Therefore, it is the responsibility of all TRICS® users to ensure that full details of how data was obtained, along with clear indications of what the data represents, are provided to data recipients."

WSCC Highways **have not** followed any aspect of the best practice guidance.

WSCC Highways **have not** audited the TRICS data received as the applicant Dunmoore has not published the TRICS data.

WSCC Highways **have not** validated that the initial inclusion criteria are correct.

WSCC Highways **have not** applied any assurance that the data has been produced in accordance with the guidance.

WSCC Highways **have not** validated full details of how data was obtained, along with clear indications of what the date represents.

Dunmoore have taken the vehicle trip output from TRICS and applied a set of assumption to reduce them down.

WSCC Highways **have not** validated those assumptions.

LIDL

This is the same poor and repeated performance that WSCC Highways conducted on their assessment of the approved and now operational Lidl (DC/21/0321). They did no validation of Dunmoore's vehicle trip calculations and Dunmoore's statement that the Lidl carpark would not exceed 44 carpark spaces being used at peak demand.

In reality the Lidl store carpark is near to full on its 119 spaces on multiple occasions each day and throughout the week and weekend resulting in shoppers driving around the carpark waiting on spaces to free up or parking over at the Costa and walking over.

MCDONALDS

Dunmoore attempted and failed to secure a drive-thru McDonalds' at the Billinghurst Trade Park in 2021 and 2022.

WSCC Highway yet again took Dunmoore's daily vehicle trip calculation of 800 trips on face value even when presented with data showing the daily trips would be more likely 3000.

Below is the Highway related section of the Objection submitted to planning officer on 23/10/24 suggesting that she share with WSCC Highways. This has not happened.

1. SYSTEMATIC AND DELIBARATE APPLICATION OF INCORRECT ASSUMPTIONS TO DRIVE TOWARDS EXTERMELY LOW AND INCORRECT VOLUMES OF CAR TRIPS FOR THE PROPOSED RANGE

Why is this important ?

These trip volumes are the most significant input into calculations submitted by Dunmore for

1. The parking space needed
2. The environmental impact (traffic pollution) of the store
3. The traffic impact on the surrounding road network
4. The water usage and neutrality assessment.

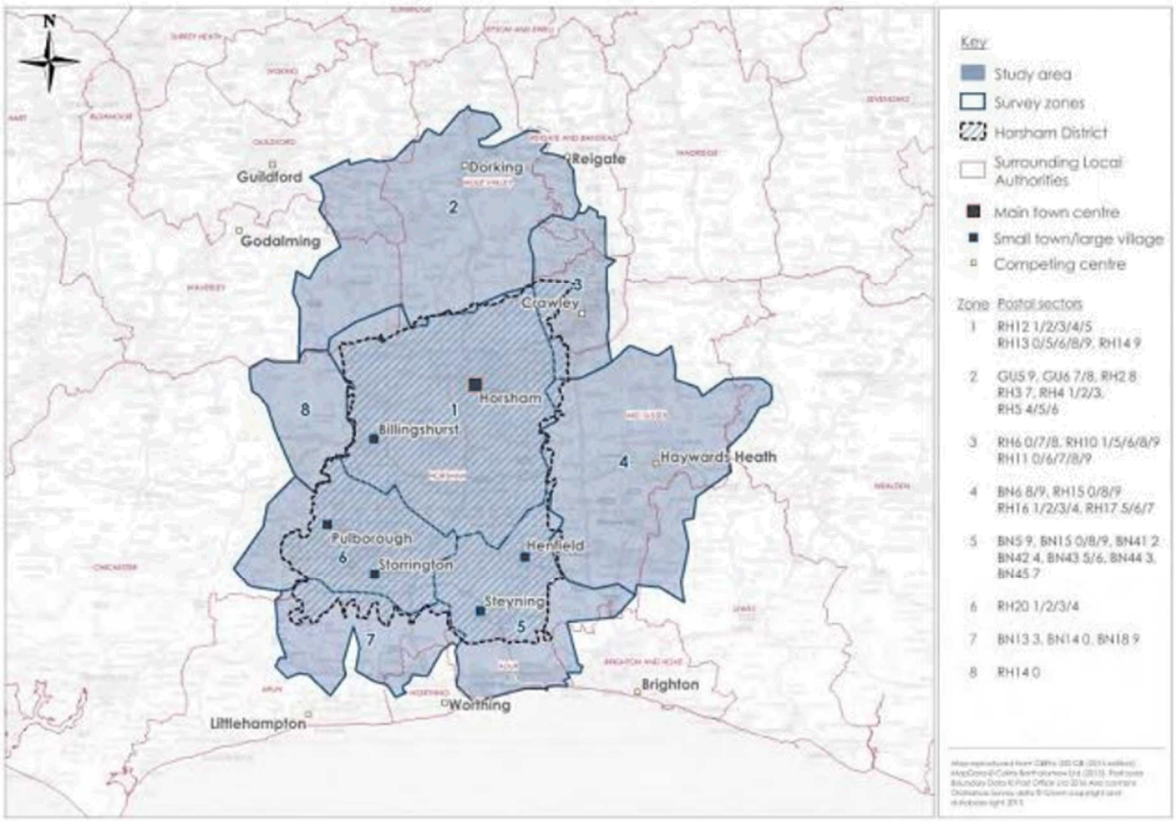
Dunmoore have stated:

> ***"The Range will generate fewer trips than the consented use (light industrial/storage) during the morning peak hour. In the evening peak hour there would be circa 26 additional two-way vehicle trips."***

Even before diving into the details of how they have reached that conclusion it is inconceivable that such a conclusion can be correct by just reviewing the primary catchment area that Dunmoore have presented in their application.

Dunmoore have stated:

> *"The proposed store is intended to serve Billingshurst and surrounding rural villages within easy drive time. This has been determined following market research by the operator and is required for the use to be viable.*
>
> *This has been interpreted, as part of the accompanying Retail Impact Assessment (as submitted with the planning application) as a Primary Catchment Area that is based on zones 1, 6 and 8 of the Horsham Town Retail and Leisure Study' (2017) (see below).*



Horsham Town Retail and Leisure Study' (2017)

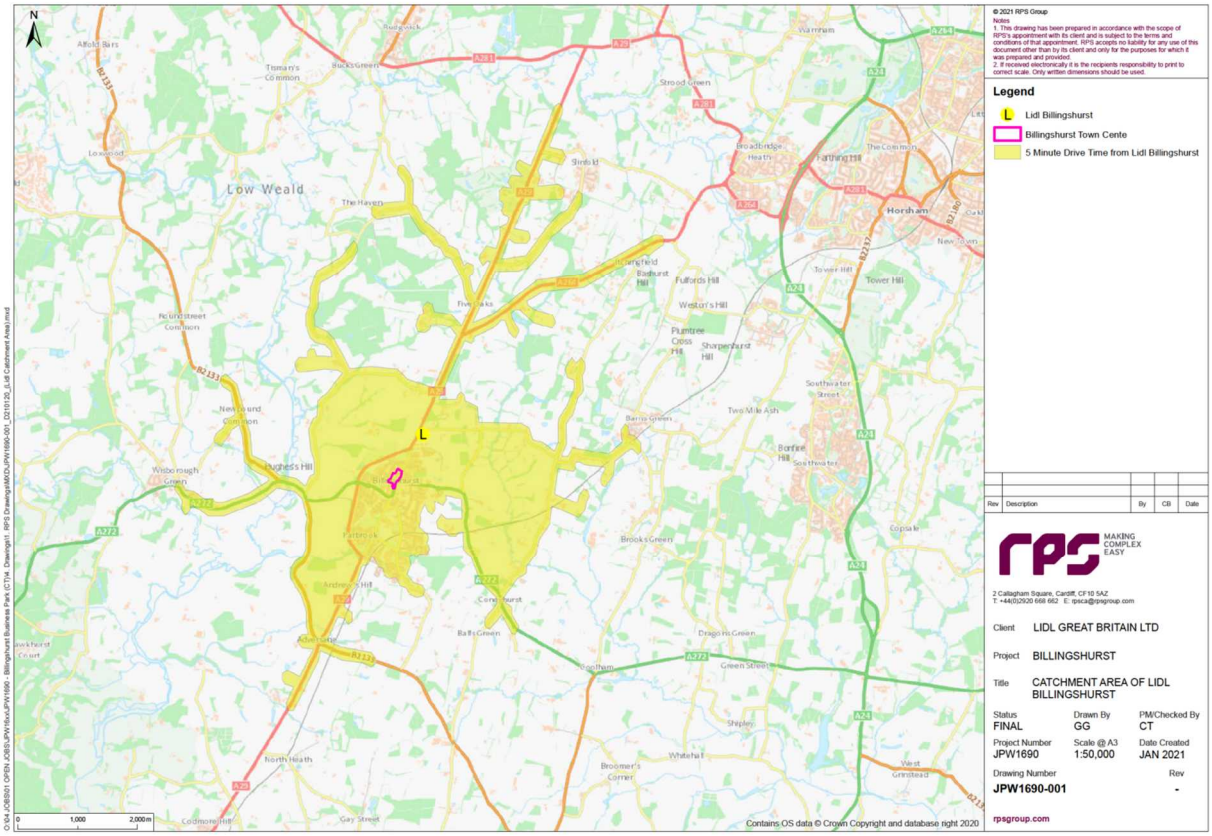
> *In order to serve this catchment the store must be located close to the centre of this area, in order for it to be sufficiently accessible to all parts of the area. As the rural sites are not suitable, due to planning restrictions and the relative poor public transport accessible, this means that a suitable site location is restricted to central and edge of centre sites in Billingshurst."*

This is a massively significantly larger catchment area than Dunmoore presented for the Lidl store. Then they stated for Lidl:

> *"The new foodstore will address a longstanding undersupply of food retail provision in the village, a situation that will become more acute as additional housing development comes forward through existing and emerging allocations. As an established Limited Assortment Discounter (LAD) retailer, Lidl will offer a genuine alternative for local people in a convenient and accessible location."*

> *"Lidl stores operate to a localised catchment and this store would be expected to draw trade from Billingshurst only. "*

The below was submitted by Dunmoore highlighting 5 mins drive in yellow.



How is it possible that such a large catchment area for the Range will result in ***"fewer trips than the consented use (light industrial/storage) during the morning peak hour. In the evening peak hour there would be circa 26 additional two-way vehicle trips"*** **??**

It is not possible and Dunmoore have reached their conclusion by knowingly and deliberately applying a set of incorrect assumption to calculate unrealistically low trip volumes.

Let's take another recent datapoint to reinforce this point further.

The catchment area stated by Dunmoore is the same one that M&S made reference to when they presented to the Billingshurst Parish Council in July 2024. M&S were presenting on having one of their stores at Billingshurst some 200 metres from the proposed Range. The M&S representative stated that Billingshurst location was critically important as it served a catchment area which had a population of 65000 people within a 20 minute drive. Interestingly as a result of this catchment area M&S were proposing 239 carpark spaces for their proposed 1950 sqm store.

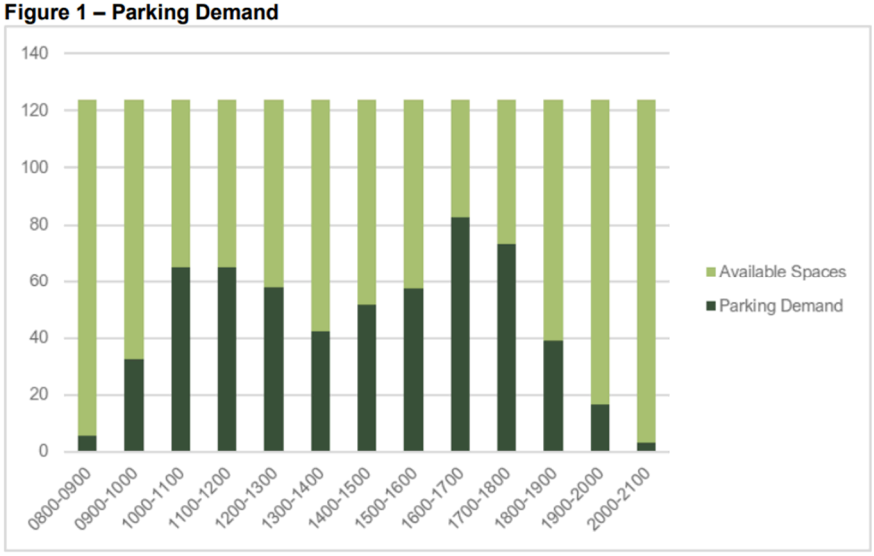
Dunmoore are proposing 124 carpark spaces for the Range which is a 3119 sqm store– so a much smaller carpark for a significantly larger store than M&S.

	Store Size	Proposed Carpark Spaces
M&S	1950 sqm	239
The Range	3119 sqm	124

Dunmoore are stating that 124 spaces are ample as their assessment of trip volumes means that at peak times the Range carpark will have a minimum of 41 spaces. See below statement.

> *"A parking accumulation exercise has been undertaken accounting for the proposed parking provision and expected development parking demand. For the purposes of this assessment, data has been obtained from the TRICS database with vehicle trips associated with the retail and garden centre elements assessed separately.*
>
> *Figure 1 – Parking Demand. As demonstrated above, it is expected that there would be a minimum of 41 spaces available during the busiest time of 1600-1700. It is therefore considered that the proposed parking levels are suitable to serve the development without resulting in overspill parking throughout the wider site area.*

Figure 1 – Parking Demand



"

The only way Dunmoore have reached this conclusion is by deliberately and knowing manipulating the input data for the TRICS database so that the output is unrealistically low and then applying further flawed assumption to result in misleading trip volumes.

Dunmoore have form. They did exactly the same when they were applying for the McDonalds on the trade park in 2021. Dunmoore presented 800 trips per day when equivalent units create near to 3000. See Appendix A for details of all the manipulation Dunmoore applied to the McDonalds application TRICS data inputs. Dunmoore have not submitted the input data for The Range application so it is not possible to check. This should be demanded to be submitted and then, per TRICS published best practise, it should be fully and independently validated.

Dunmoore have repeated this strategy across the trade park. For the Lidl Dunmoore stated:

> *"In order to establish the parking demand generated by the discount food retailer, an assessment has been undertaken based on the TRICS database. The full parking demand assessment is attached at Appendix E and demonstrates that the peak demand for parking is likely to be in the order of 44 vehicles (between 12:00 and 14:00 hours).*
>
> *Given that the development makes provision for 119 parking spaces (including 6 blue badge spaces, 2 EV spaces and 9 parent and child spaces), it is clear that the level of car parking provided will minimise the potential to overspill onto surrounding roads*

(including within the site) to the detriment of highway safety and the free-flow of traffic. It is therefore evident that the proposals accord with Policy 41 of the HDPF."

Even though the planning guidelines for Retail advice on 1 space per 14 sqm Dunmoore were able to deliberately and knowing manipulate the input data for the TRICS database so that the output is unrealistically low and misleading trip volumes and hence they were able to state that the Lidl carpark would not exceed 44 carpark spaces being used at peak demand.

In reality the Lidl store carpark is near to full on multiple occasions each day and throughout the week and weekend resulting in shoppers driving around the carpark waiting on spaces to free up or parking over at the Costa and walking over. This reinforces how the trip counts submitted are far from accurate. Dunmoore did not submit the input data for Lidl application so it was not checked. WSCC Highways just took Dunmoore word on their trip count with no independent validation.

Returning to The Range Dunmoore have stated:

"It is proposed that 124 car parking spaces are provided, including 4 accessible bays and 5 parent and child bays. An additional 10 car parking spaces will be available during trading hours, albeit these will be required to facilitate HGV turning movements when deliveries are undertaken. The proposed parking levels therefore equate to 1 space per 25-27sqm of floor area."

So they have significantly breached the Retail requirement of 1 space per 14sqm and have done so by deliberately and knowing manipulating the input data for the TRICS database so that the output is unrealistically low and misleading trip volume.

M&S on the other hand have operated with high integrity in determining the trip volumes of the catchment area resulting in the need for 239 carpark spaces for their store. This equates to 1 space per 8 sqm of Retail floor area.

2. BREAKDOWN OF DUNMOORE'S CALCULATION OF TRIP VOLUMES AND THEIR FLAWED/INCORRECT ASSUMPTIONS

Below is the trip generation statements made by Dunmoore. Through a set of flawed and wholly incorrect assumptions they conclude that The Range will generate fewer trips than the consented use during the morning peak hour. In the evening peak hour there would be circa 26 additional two-way vehicle trips. As with the Lidl, Dunmoore have not published the TRISC input data that calculates the trip counts. I have highlighted in yellow the flaws and incorrect assumptions in these trip generation statements to demonstrate how incorrect they are and hence when combined they resulting in the ridiculously low trip count presented by Dunmoore.

Trip Generation

Consented Use

5.2 The site has an extant consent for a flexible B1c / B2 / B8 development. As such, consideration has been made as to the consented level of trip generation associated with this use. Trip rates have been obtained from the Transport Assessment approved as part of

the hybrid application (Planning Ref. DC/18/2122). The resulting vehicle trips are shown in Table 2 below.

Table 2 – Consented Trips

	Arrivals	Departures	Total
AM Peak (0800-0900)	11	4	15
PM Peak (1700-1800)	3	11	14

These trip numbers were achieved using TRICS. Dunmoore did not publish and hence WSCC Highways did not independent validate that the data inputs that Dunmoore selected were correct.

Proposed Use

5.3 In assessing the expected trip generation associated with the proposed development, retail trip rates have been obtained from the TRICS database and are included at Appendix B. The resulting vehicle trips are shown in Table 3 and the full calculations are included at Appendix C.

Table 3 – Retail Trips

	Arrivals	Departures	Total
AM Peak (0800-0900)	11	2	13
PM Peak (1700-1800)	31	36	67

Dunmoore have yet again not shared the data inputs that they have used for the TRICS database. They have form therefore it can be assumed that these trips are severely undercalculated

5.4 The proposals include provision of a 390sqm garden centre. As the retail trip rates are associated with stores that do not incorporate a garden centre, a separate TRICS assessment has been undertaken. This is considered to be a robust approach when, in reality, it is unlikely that the garden centre will attract trips in its own right and rather that these will be linked with trips to the wider retail store.

This assumption on linked trips has no basis. Dunmoore use this repeatedly and deliberately to systematically reduce trip volumes.

5.5 It is noted that there are no comparable sites with trip rates for weekdays and, as such, the Saturday trip rates provided have been used as representation of the weekday movement patterns.

This is difficult to believe – there are over 210 Range stores and many hundreds of other such store types across the UK. This is extremely suspicious and likely to be aiding Dunmoore on their low trip volume drive.

5.6 The full TRICS output report is attached at Appendix B whilst Table 4 provides a summary of the expected trips associated with the garden centre during the morning and evening peak hours.

Appendix B is not submitted. In addition, the Input Data for the TRICS database have not been submitted and hence have not been independently validated following TRICS best practice.

Table 4 – Garden Centre Trips

	Arrivals	Departures	Total
AM Peak (0800-0900)	2	1	3
PM Peak (1700-1800)	5	8	13

5.7 The total number of vehicle trips associated with the proposed development are shown in table 5.

Table 5 – Total Development Trips

	Arrivals	Departures	Total
AM Peak (0800-0900)	13	3	16
PM Peak (1700-1800)	36	44	80

Trip Type

5.8 Notwithstanding the above, it is pertinent to note that a high proportion of trips associated with the development are not expected to be new to the network. Instead, they are already going shopping somewhere (and therefore generating a trip on the network) and the new facility simply leads to a redistribution of existing trips.

This is massively flawed assumption. The catchment area for The Range presented by Dunmoore will attract trips from a much wider area than the Lidl and other units on the trade park. There will be a high proportion of new trips to the network and these new trips will very likely create high proportion of new linked trips to other units on the trade park, straining their carpark space. Dunmoore are unable to present data and facts contrary to this situation occurring.

5.9 This is particularly the case in the peak hour periods. People are very unlikely to make a dedicated trip with its prime purpose to visit a retailer during the time of the day when traffic flows and delay are greatest. They are much more likely to call in to the retailer as part of another journey purpose (e.g. on the way home from work) or adjust their visit to another time of day. Therefore, 'new' trips on the network are likely to be low.

As stated previously this is a massively flawed assumption and in the case of Lidl in reality has proven to be incorrect.

5.10 It is also highly likely that a significant proportion of trips will be pass-by trips i.e. people travelling on the A29 who will call in to use the store on the way past. Pass-by trips are

usually higher where retail units are located next to main roads as in the case with the proposed site.

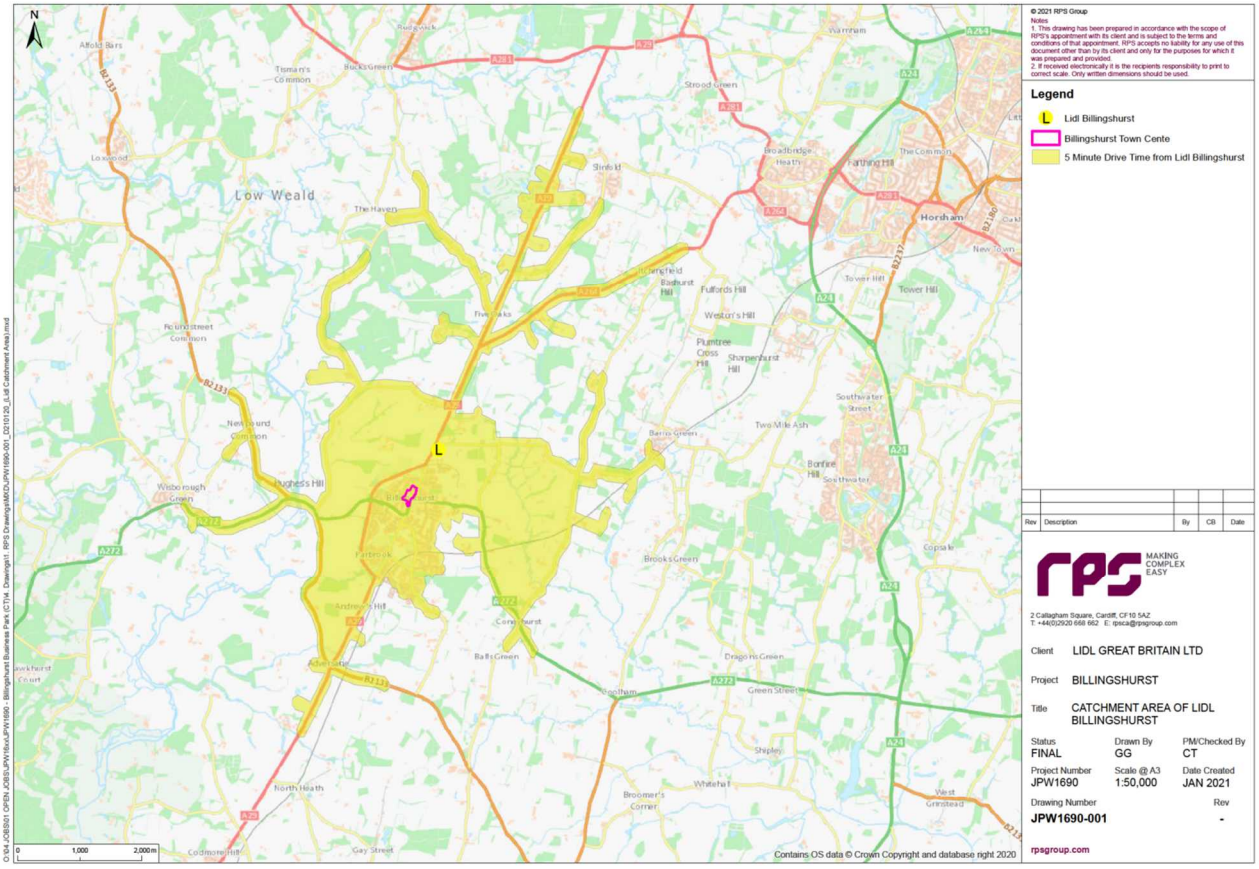
This is massively flawed assumption. The catchment area for The Range presented by Dunmoore will attract trips from a very wide area. These will be new trips onto the A29 for the sole purpose of visit The Range and subsequently other retail outlets on the trade park.

5.11 Indeed, the approved food store application cited a trip reduction of 50% to account for the expected proportions of linked and pass-by trips which has been agreed with HDC and WSCC. With this in mind, Table 6 summarises the expected trip generation by trip type.

Though HDC and WSCC might have agreed with pass-by-trip assumption in the past this assumption can not be considered to hold true for The Range and its massively large catchment area compared to the Lidl which Dunmoore stated

> "The new foodstore will address a longstanding undersupply of food retail provision in the village, a situation that will become more acute as additional housing development comes forward through existing and emerging allocations. As an established Limited Assortment Discounter (LAD) retailer, Lidl will offer a genuine alternative for local people in a convenient and accessible location."

> "Lidl stores operate to a localised catchment and this store would be expected to draw trade from Billingshurst only. "



There is no comparison with this local catchment area and the one proposed for the Range. The 50% reduction does not apply.

Table 6 – Trips by Type

New Trips	Arrivals	Departures	Total
AM Peak (0800-0900)	7	1	8
PM Peak (1700-1800)	18	22	40
Linked Trips	**Arrivals**	**Departures**	**Total**
AM Peak (0800-0900)	7	1	8
PM Peak (1700-1800)	18	22	40

Net Trip Generation

5.12 In assessing the net trip generation of the proposals, a comparison has been made between the consented trips in Table 2 and the new trips in Table 5. The resulting net change in trips is shown in Table 6.

	AM Peak			PM Peak		
	Arr.	Dep.	Total	Dep.	Arr.	Total
Consented	11	4	15	3	11	14
Proposed	7	1	8	18	22	40
Net Change	**-5**	**-3**	**-8**	**+15**	**+11**	**+26**

5.13 It is demonstrated that the proposed development would likely generate fewer trips than the consented use during the morning peak hour. In the evening peak hour there would be circa 26 additional two-way vehicle trips equating to in the region of one additional vehicle every 2- 3 minutes across the hour.

At its peak (1700-1800 hours) it is expected that the development would generate 80 trips. It should be noted that these trips are not expected to be new to the network and would instead be going shopping somewhere with the new facility leading to a redistribution of existing trips on the road network and thereby limiting the overall impact of the development. On this basis it is demonstrated that the proposals would not have a significant impact on the network with suitable parking provided on site.

Against this is massively flawed assumption. The catchment area for The Range presented by Dunmoore will attract trips from a much wider area than the Lidl and other units on the trade park. There will be a high proportion of new trips to the network and these new trips will very likely create high proportion of new linked trips to other units on the trade park, straining their carpark space. Dunmoore are unable to present data and facts contrary to this situation occurring. Therefore the proposal WILL have a significant impact on the network and suitable parking on site.

This combination of systematic and deliberate application of incorrect input data into TRICS and then on top of that application of incorrect and flawed assumptions on the TRICS database output results in the inconceivably low trip volumes that Dunmoore are attempting to present.

Recommend Actions

- **Demand that Dunmoore submit onto the planning portal the input assumptions for the TRICS database and the detailed outputs include reference sites.**
- **Ensure that TRICS best practice is followed by WSCC Highway or an independent body to validate and correct the input assumptions. Follow the actions laid out in appendix A.**
- **Work through in detail the flawed assumptions that Dunmoore are applying to take the TRICS output and reduce the trip volumes. Obtain independent views on the assumptions and publish these views on the planning portal**
- **Conduct a full traffic assessment of the trade park and other developments (DC/23/2103) that will use the trade park road network taking real life data from current operations and then scaling up to include Dunmoore's desire for The Range, M&S and the additional supermarket on plots 1, 2a, 2b. Apply the modelling to impact on wider road network and the trade park roundabout to validate whether they can cope.**
- **Ask Dunmoore to obtain from The Range in confidence the business case for the store. This will include average customer footfall. This can be compared with fully independently validated trip volumes for further checking. If Dunmoore refuse to obtain there in lies further verification of their attempts to mislead with low trip volumes.**

End of Appendix 1

Appendix 2

Submission to Horsham District Council Planning Committee on DC/24/1452

I fully support HDC refusal reasons. But they have missed two very material ones.

Incorrect Traffic Assessment and Lower Employment Numbers

1. Incorrect Traffic Assessment

HDC/Highways have stated when park is complete it will generate 450 vehicle trips per day at peak times.

In Jan 2024 a manual count was conducted for the Hilland House development (125 dwellings committee rejected recently)

That calculated 1200 vehicle trips per day at peak times. See appendix.

How can we have such a massive disparity ? 3 times the volume of traffic when the park is only a third complete. **This means when the park is fully built out we will have 9 times the stated traffic volumes !!**

From the first planning application in 2018 the applicant has repeatedly manipulated data and used incorrect assumptions to generate low vehicle trip counts.

I have been repeatedly stating this to HDC and Highways since 2021 when the applicant attempted to secure a McDonalds on the park. I have been ignored.

Highways do zero independent validation, don't follow TRICs best practice (see appendix) which warns of such misuse and steps to detect and rectify. And HDC have aligned with Highways. Emma Parkes is aware that I logged a formal complaint with her on this matter last Oct.

Another datapoint

The applicant used the same method with the Lidl on the park, producing low trip volumes so they could state that at peak times the carpark would only be a third full. That is never the case with the carpark (120 spaces) full at multiple times during the day and people having to park and walk over from Costa.

On the Range

The catchment area that the applicant states has a population of 131,000. Yet the applicant has determined that only 26 additional trips will be generated in peak hours compared to the current proposed light industrial/storage use.

And Highways and HDC have accepted this with zero validation or even the common sense to wonder how a population of 131000 people can generate such a low trip count.

With Hillands House the committee overruled Highways and HDC assessment – councillor Fletchers memorable statement on "2 landrover discoverys attempting to pass each other".

Back to my first statement. We have 3 times the level of traffic with the park only one third complete.

Please add a refusal reason on the grounds in inaccurate traffic assessment.

2. Reduction in Employment Numbers

The applicant has stated in their a water neutrality submission that employment numbers have reduced from 81 on the current consented industrial use to 33 for Retail use.

I made HDC aware of this back in July but it is not mentioned in the report.

Please add a refusal reason on the grounds of reduction in employment numbers from consented permission.

Appendix

Vehicle Trip Count.

Section 6.79 of committee report states the fully built-out development (of up to 19,075 sq.m across both phases) will generate site-wide average of 137 AM peak arrivals and 98 AM peak departures, and around 89 PM peak arrivals and 134 PM peak departures"

This amounts to 458 trips in peak hours (8am to 9am, and 5pm to 6pm).

The below manual count data for the Hilland House development taken in January 2024 calculates the trips in peak hours to be 1179 with the park only one third complete. See figures in red ovals below.

Billingshurst Trade Park
Tuesday 23rd January 2024
Junction: 1
Approach: A29 Stane Street North

	To New Road									To Billingshurst Trade Park									To A29 Stane Street (S)								
TIME	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs
07:00 - 07:15	0	0	1	1	0	0	0	2	2.0	0	0	8	4	0	0	0	12	12.0	0	0	37	11	3	2	0	53	57.1
07:15 - 07:30	0	0	0	0	0	0	0	0	0.0	0	0	8	6	0	0	0	14	14.0	0	0	77	18	3	1	0	99	101.8
07:30 - 07:45	0	0	0	0	0	0	0	0	0.0	0	0	7	8	2	0	0	17	18.0	0	0	101	26	2	1	2	132	136.3
07:45 - 08:00	0	0	1	1	0	0	0	2	2.0	0	0	16	10	2	0	0	28	29.0	0	0	113	21	6	2	1	143	149.6
Hourly Total	**0**	**0**	**2**	**2**	**0**	**0**	**0**	**4**	**4.0**	**0**	**0**	**39**	**28**	**4**	**0**	**0**	**71**	**73.0**	**0**	**0**	**328**	**76**	**14**	**6**	**3**	**427**	**444.8**
08:00 - 08:15	0	0	4	0	0	0	0	4	4.0	0	0	21	4	1	0	0	26	26.5	0	1	85	37	7	5	0	135	144.4
08:15 - 08:30	0	0	3	0	1	1	0	5	6.8	0	0	17	9	0	0	0	26	26.0	0	2	119	25	7	0	2	155	159.3
08:30 - 08:45	0	0	1	2	0	0	0	3	3.0	0	0	15	2	1	0	0	18	18.5	0	0	103	26	10	1	3	143	152.3
08:45 - 09:00	0	0	0	0	0	0	0	0	0.0	0	1	19	8	2	0	0	30	30.4	0	1	104	30	6	1	2	144	149.7
Hourly Total	**0**	**0**	**8**	**2**	**1**	**1**	**0**	**12**	**13.8**	**0**	**1**	**72**	**23**	**4**	**0**	**0**	**100**	**101.4**	**0**	**4**	**411**	**118**	**30**	**7**	**7**	**577**	**605.7**
09:00 - 09:15	0	0	1	0	1	0	0	2	2.5	0	0	15	2	1	0	0	18	18.5	0	1	113	31	6	2	2	155	162.0
09:15 - 09:30	0	0	1	0	0	0	0	1	1.0	0	0	8	8	1	2	0	19	22.1	0	0	67	23	5	3	0	98	104.4
09:30 - 09:45	0	0	2	1	0	0	0	3	3.0	0	0	13	8	3	0	0	24	25.5	0	0	71	21	5	3	0	100	106.4
09:45 - 10:00	0	0	0	0	0	0	0	0	0.0	0	0	9	6	1	0	0	16	16.5	0	0	69	18	4	3	0	94	99.9
Hourly Total	**0**	**0**	**4**	**1**	**1**	**0**	**0**	**6**	**6.5**	**0**	**0**	**45**	**24**	**6**	**2**	**0**	**77**	**82.6**	**0**	**1**	**320**	**93**	**20**	**11**	**2**	**447**	**472.7**
TOTAL	**0**	**0**	**14**	**5**	**2**	**1**	**0**	**22**	**24.3**	**0**	**1**	**156**	**75**	**14**	**2**	**0**	**248**	**257.0**	**0**	**5**	**1059**	**287**	**64**	**24**	**12**	**1451**	**1523.2**
16:00 - 16:15	0	0	3	0	0	0	0	3	3.0	0	0	18	5	1	0	0	24	24.5	0	0	119	32	7	1	1	160	165.8
16:15 - 16:30	0	0	5	0	0	0	0	5	5.0	0	0	20	4	1	0	0	25	25.5	0	0	143	39	3	0	2	187	190.5
16:30 - 16:45	0	0	2	1	0	0	0	3	3.0	0	0	28	9	0	0	0	37	37.0	0	1	181	40	4	0	0	226	227.4
16:45 - 17:00	0	0	3	0	0	0	0	3	3.0	0	0	23	2	0	0	0	25	25.0	0	0	160	36	6	0	0	202	205.0
Hourly Total	**0**	**0**	**13**	**1**	**0**	**0**	**0**	**14**	**14.0**	**0**	**0**	**89**	**20**	**2**	**0**	**0**	**111**	**112.0**	**0**	**1**	**603**	**147**	**20**	**1**	**3**	**775**	**788.7**
17:00 - 17:15	0	0	2	1	0	0	0	3	3.0	0	0	23	2	1	0	0	26	26.5	0	1	188	40	3	0	0	232	232.9
17:15 - 17:30	0	0	3	1	0	0	0	4	4.0	0	0	27	6	0	0	0	33	33.0	0	1	221	21	1	0	0	244	243.9
17:30 - 17:45	0	0	1	0	0	0	0	1	1.0	0	0	17	2	0	0	0	19	19.0	0	1	244	23	3	0	2	273	275.9
17:45 - 18:00	0	0	5	0	0	0	0	5	5.0	0	0	25	3	0	0	0	28	28.0	0	1	197	15	1	2	0	216	218.5
Hourly Total	**0**	**0**	**11**	**2**	**0**	**0**	**0**	**13**	**13.0**	**0**	**0**	**92**	**13**	**1**	**0**	**0**	**106**	**106.5**	**0**	**4**	**850**	**99**	**8**	**2**	**2**	**965**	**971.2**
18:00 - 18:15	0	0	4	0	0	0	0	4	4.0	0	0	25	2	1	0	0	28	28.5	0	2	163	13	2	0	0	180	179.8
18:15 - 18:30	0	0	0	0	0	0	0	0	0.0	0	0	13	0	1	1	0	15	16.8	0	4	137	12	2	0	1	156	155.6
18:30 - 18:45	0	0	1	0	0	0	0	1	1.0	0	0	18	1	0	0	0	19	19.0	0	2	122	7	2	0	1	134	134.8
18:45 - 19:00	0	0	1	0	0	0	0	1	1.0	0	0	14	1	1	0	0	16	16.5	0	0	99	7	0	1	0	107	108.3
Hourly Total	**0**	**0**	**6**	**0**	**0**	**0**	**0**	**6**	**6.0**	**0**	**0**	**70**	**4**	**3**	**1**	**0**	**78**	**80.8**	**0**	**8**	**521**	**39**	**6**	**1**	**2**	**577**	**578.5**
TOTAL	**0**	**0**	**30**	**3**	**0**	**0**	**0**	**33**	**33.0**	**0**	**0**	**251**	**37**	**6**	**1**	**0**	**295**	**299.3**	**0**	**13**	**1974**	**285**	**34**	**4**	**7**	**2317**	**2338.4**

Billingshurst Trade Park
Tuesday 23rd January 2024
Junction: 1
Approach: New Road

	To Billinghurst Trade Park									To A29 Stane Street (S)									To A29 Stane Street (N)								
TIME	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs
07:00 - 07:15	0	0	2	0	1	0	0	3	3.5	0	0	2	0	0	0	0	2	2.0	0	0	3	1	0	0	0	4	4.0
07:15 - 07:30	0	0	0	0	0	0	0	0	0.0	0	0	5	0	0	0	0	5	5.0	0	0	1	0	0	0	0	1	1.0
07:30 - 07:45	0	0	1	0	0	0	0	1	1.0	1	0	6	2	0	0	0	9	8.2	0	0	2	2	0	0	0	4	4.0
07:45 - 08:00	0	0	1	3	0	0	0	4	4.0	0	0	8	1	2	0	0	11	12.0	0	1	1	0	0	0	0	2	1.4
Hourly Total	**0**	**0**	**4**	**3**	**1**	**0**	**0**	**8**	**8.5**	**1**	**0**	**21**	**3**	**2**	**0**	**0**	**27**	**27.2**	**0**	**1**	**7**	**3**	**0**	**0**	**0**	**11**	**10.4**
08:00 - 08:15	0	0	2	3	0	0	0	5	5.0	0	0	6	0	0	0	0	6	6.0	0	0	4	0	0	0	0	4	4.0
08:15 - 08:30	0	0	4	1	1	0	0	6	6.5	0	1	7	0	0	0	0	8	7.4	0	0	4	0	0	0	0	4	4.0
08:30 - 08:45	0	0	0	2	1	0	0	3	3.5	0	0	11	1	0	0	0	12	12.0	0	0	1	0	0	0	0	1	1.0
08:45 - 09:00	0	0	4	1	0	0	0	5	5.0	0	0	6	0	0	0	0	6	6.0	0	0	2	0	0	0	0	2	2.0
Hourly Total	**0**	**0**	**10**	**7**	**2**	**0**	**0**	**19**	**20.0**	**0**	**1**	**30**	**1**	**0**	**0**	**0**	**32**	**31.4**	**0**	**0**	**11**	**0**	**0**	**0**	**0**	**11**	**11.0**
09:00 - 09:15	0	0	3	2	0	0	0	5	5.0	0	0	20	3	0	0	0	23	23.0	0	0	1	1	0	0	0	2	2.0
09:15 - 09:30	0	0	3	0	0	0	0	3	3.0	0	0	7	1	0	0	0	8	8.0	0	0	3	0	0	0	0	3	3.0
09:30 - 09:45	0	0	4	1	0	0	0	5	5.0	0	0	2	2	0	0	0	4	4.0	0	0	2	1	0	0	0	3	3.0
09:45 - 10:00	0	0	3	1	0	0	0	4	4.0	0	0	9	0	0	0	0	9	9.0	0	0	0	0	0	0	0	0	0.0
Hourly Total	**0**	**0**	**13**	**4**	**0**	**0**	**0**	**17**	**17.0**	**0**	**0**	**38**	**6**	**0**	**0**	**0**	**44**	**44.0**	**0**	**0**	**6**	**2**	**0**	**0**	**0**	**8**	**8.0**
TOTAL	**0**	**0**	**27**	**14**	**3**	**0**	**0**	**44**	**45.5**	**1**	**1**	**89**	**10**	**2**	**0**	**0**	**103**	**102.6**	**0**	**1**	**24**	**5**	**0**	**0**	**0**	**30**	**29.4**
16:00 - 16:15	0	0	2	2	0	0	0	4	4.0	0	0	11	3	0	0	0	14	14.0	0	0	1	0	0	0	0	1	1.0
16:15 - 16:30	0	0	4	2	0	0	0	6	6.0	0	0	9	2	0	0	0	11	11.0	0	0	0	0	0	0	0	0	0.0
16:30 - 16:45	0	0	3	2	0	0	0	5	5.0	0	0	7	0	0	0	0	7	7.0	0	0	2	1	0	0	0	3	3.0
16:45 - 17:00	0	0	7	1	0	0	0	8	8.0	0	0	6	1	0	0	0	7	7.0	0	0	1	0	0	0	0	1	1.0
Hourly Total	**0**	**0**	**16**	**7**	**0**	**0**	**0**	**23**	**23.0**	**0**	**0**	**33**	**6**	**0**	**0**	**0**	**39**	**39.0**	**0**	**0**	**4**	**1**	**0**	**0**	**0**	**5**	**5.0**
17:00 - 17:15	0	0	2	0	0	0	0	2	2.0	0	0	12	0	0	0	0	12	12.0	0	0	1	0	0	0	0	1	1.0
17:15 - 17:30	0	0	3	1	0	0	0	4	4.0	0	0	1	1	0	0	0	2	2.0	0	0	1	0	0	0	0	1	1.0
17:30 - 17:45	0	0	6	0	0	0	0	6	6.0	1	0	6	0	0	0	0	7	6.2	0	0	0	0	0	0	0	0	0.0
17:45 - 18:00	0	0	3	0	0	0	0	3	3.0	0	0	2	0	0	0	0	2	2.0	0	0	0	0	0	0	0	0	0.0
Hourly Total	**0**	**0**	**14**	**1**	**0**	**0**	**0**	**15**	**15.0**	**1**	**0**	**21**	**1**	**0**	**0**	**0**	**23**	**22.2**	**0**	**0**	**2**	**0**	**0**	**0**	**0**	**2**	**2.0**
18:00 - 18:15	0	0	0	0	0	0	0	0	0.0	0	0	5	0	0	0	0	5	5.0	0	0	0	0	0	0	0	0	0.0
18:15 - 18:30	0	0	2	0	0	0	0	2	2.0	0	0	1	1	0	0	0	2	2.0	0	0	1	0	0	0	0	1	1.0
18:30 - 18:45	0	0	1	0	0	0	0	1	1.0	0	0	3	0	0	0	0	3	3.0	0	1	1	0	0	0	0	2	1.4
18:45 - 19:00	0	0	4	0	0	0	0	4	4.0	0	0	3	0	0	0	0	3	3.0	0	0	0	0	0	0	0	0	0.0
Hourly Total	**0**	**0**	**7**	**0**	**0**	**0**	**0**	**7**	**7.0**	**0**	**0**	**12**	**1**	**0**	**0**	**0**	**13**	**13.0**	**0**	**1**	**2**	**0**	**0**	**0**	**0**	**3**	**2.4**
TOTAL	**0**	**0**	**37**	**8**	**0**	**0**	**0**	**45**	**45.0**	**1**	**0**	**66**	**8**	**0**	**0**	**0**	**75**	**74.2**	**0**	**1**	**8**	**1**	**0**	**0**	**0**	**10**	**9.4**

Billingshurst Trade Park
Tuesday 23rd January 2024
Junction: 1
Approach: Billinghurst Trade Park

	To A29 Stane Street (S)									To A29 Stane Street (N)									To New Road								
TIME	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs
07:00 - 07:15	0	0	13	3	0	0	0	16	16.0	0	1	11	6	0	1	0	19	19.7	0	0	1	0	0	0	0	1	1.0
07:15 - 07:30	0	0	8	11	2	0	0	21	22.0	0	0	8	7	0	0	0	15	15.0	0	0	0	1	0	0	0	1	1.0
07:30 - 07:45	0	0	11	10	4	1	1	27	31.3	0	0	18	8	0	0	0	26	26.0	0	0	0	0	0	0	0	0	0.0
07:45 - 08:00	0	0	17	10	2	0	0	29	30.0	0	0	14	11	3	0	0	28	29.5	0	0	0	2	0	0	0	2	2.0
Hourly Total	**0**	**0**	**49**	**34**	**8**	**1**	**1**	**93**	**99.3**	**0**	**1**	**51**	**32**	**3**	**1**	**0**	**88**	**90.2**	**0**	**0**	**1**	**3**	**0**	**0**	**0**	**4**	**4.0**
08:00 - 08:15	0	0	18	17	3	0	1	39	41.5	0	0	24	6	1	0	0	31	31.5	0	0	0	0	0	0	0	0	0.0
08:15 - 08:30	0	0	37	13	2	0	0	52	53.0	0	0	15	6	0	1	0	22	23.3	0	0	1	0	0	0	0	1	1.0
08:30 - 08:45	0	0	21	12	3	0	0	36	37.5	0	0	16	4	2	0	0	22	23.0	0	0	0	0	0	0	0	0	0.0
08:45 - 09:00	0	0	26	11	3	1	0	41	43.8	0	0	11	9	3	0	0	23	24.5	0	0	3	0	0	0	0	3	3.0
Hourly Total	**0**	**0**	**102**	**53**	**11**	**1**	**1**	**168**	**175.8**	**0**	**0**	**66**	**25**	**6**	**1**	**0**	**98**	**102.3**	**0**	**0**	**4**	**0**	**0**	**0**	**0**	**4**	**4.0**
09:00 - 09:15	0	2	38	13	2	0	0	55	54.8	0	0	18	8	1	1	0	28	29.8	0	0	0	1	1	0	0	2	2.5
09:15 - 09:30	0	0	27	11	4	1	0	43	46.3	0	0	15	6	2	0	0	23	24.0	0	0	1	1	0	0	0	2	2.0
09:30 - 09:45	0	0	24	10	1	1	0	36	37.8	0	0	20	4	2	0	0	26	27.0	0	0	1	0	0	0	0	1	1.0
09:45 - 10:00	0	0	34	13	3	0	0	50	51.5	0	0	11	5	1	0	0	17	17.6	0	0	0	1	0	0	0	1	1.0
Hourly Total	**0**	**2**	**123**	**47**	**10**	**2**	**0**	**184**	**190.4**	**0**	**0**	**64**	**23**	**6**	**1**	**0**	**94**	**98.3**	**0**	**0**	**2**	**3**	**1**	**0**	**0**	**6**	**6.5**
TOTAL	**0**	**2**	**274**	**134**	**29**	**4**	**2**	**445**	**465.5**	**0**	**1**	**181**	**80**	**15**	**3**	**0**	**280**	**290.8**	**0**	**0**	**7**	**6**	**1**	**0**	**0**	**14**	**14.5**
16:00 - 16:15	0	0	45	12	0	0	0	57	57.0	0	0	13	2	0	0	0	15	15.0	0	0	2	2	0	0	0	4	4.0
16:15 - 16:30	0	0	40	12	2	0	1	55	57.0	0	0	19	8	1	0	0	28	28.5	0	0	0	0	0	0	0	0	0.0
16:30 - 16:45	0	0	49	15	0	0	0	64	64.0	0	0	21	5	1	0	0	27	27.5	0	0	2	0	0	0	0	2	2.0
16:45 - 17:00	0	0	50	15	0	0	0	65	65.0	0	0	15	8	0	0	0	23	23.0	0	0	3	0	0	0	0	3	3.0
Hourly Total	**0**	**0**	**184**	**54**	**2**	**0**	**1**	**241**	**243.0**	**0**	**0**	**68**	**23**	**2**	**0**	**0**	**93**	**94.0**	**0**	**0**	**7**	**2**	**0**	**0**	**0**	**9**	**9.0**
17:00 - 17:15	0	0	56	15	0	0	0	71	71.0	0	0	18	4	0	0	0	22	22.0	0	0	0	2	0	0	0	2	2.0
17:15 - 17:30	0	1	46	6	0	0	0	53	52.4	0	0	11	3	1	0	0	15	15.5	0	0	3	1	0	0	0	4	4.0
17:30 - 17:45	0	0	51	6	0	0	0	57	57.0	0	0	16	2	0	0	0	18	18.0	0	0	2	0	0	0	0	2	2.0
17:45 - 18:00	0	0	54	5	0	0	0	59	59.0	0	0	16	2	0	0	0	18	18.0	0	0	0	0	0	0	0	0	0.0
Hourly Total	**0**	**1**	**207**	**32**	**0**	**0**	**0**	**240**	**239.4**	**0**	**0**	**61**	**11**	**1**	**0**	**0**	**73**	**73.5**	**0**	**0**	**5**	**3**	**0**	**0**	**0**	**8**	**8.0**
18:00 - 18:15	0	0	38	8	1	0	0	47	47.5	0	0	11	2	1	0	0	14	14.5	0	0	2	1	0	0	0	3	3.0
18:15 - 18:30	0	0	46	5	1	1	0	53	54.8	0	0	14	1	0	0	0	15	15.0	0	0	0	0	0	0	0	0	0.0
18:30 - 18:45	0	0	26	3	2	0	0	31	32.0	0	0	9	4	0	0	0	13	13.0	0	0	0	0	0	0	0	0	0.0
18:45 - 19:00	0	0	34	1	0	0	0	35	35.0	0	0	11	0	0	0	0	11	11.0	0	0	0	0	0	0	0	0	0.0
Hourly Total	**0**	**0**	**144**	**17**	**4**	**1**	**0**	**166**	**169.3**	**0**	**0**	**45**	**7**	**1**	**0**	**0**	**53**	**53.5**	**0**	**0**	**2**	**1**	**0**	**0**	**0**	**3**	**3.0**
TOTAL	**0**	**1**	**535**	**103**	**6**	**1**	**1**	**647**	**651.7**	**0**	**0**	**174**	**41**	**4**	**0**	**0**	**219**	**221.0**	**0**	**0**	**14**	**6**	**0**	**0**	**0**	**20**	**20.0**

Billingshurst Trade Park
Tuesday 23rd January 2024
Junction: 1
Approach: A29 Stane Street South

	To A29 Stane Street (N)									To New Road									To Billinghurst Trade Park								
TIME	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs	CYCLE	M/CYCLE	CAR	LGV	OGV1	OGV2	BUS	TOTAL	PCUs
07:00 - 07:15	0	2	132	34	3	2	1	174	177.9	0	0	1	0	0	0	0	1	1.0	0	0	22	6	0	0	0	28	28.0
07:15 - 07:30	0	1	186	35	6	1	1	230	234.7	0	0	2	1	0	0	0	3	3.0	0	0	22	15	3	0	1	41	43.5
07:30 - 07:45	0	5	237	31	9	1	0	283	285.8	1	0	4	2	0	0	0	7	6.2	0	0	20	15	4	1	0	40	43.3
07:45 - 08:00	0	0	229	29	5	1	1	265	269.8	0	0	7	0	0	0	0	7	7.0	0	0	30	14	0	0	0	44	44.0
Hourly Total	**0**	**8**	**784**	**129**	**23**	**5**	**3**	**952**	**968.2**	**1**	**0**	**14**	**3**	**0**	**0**	**0**	**18**	**17.2**	**0**	**0**	**94**	**50**	**7**	**1**	**1**	**153**	**158.8**
08:00 - 08:15	0	2	230	29	8	0	0	269	271.8	0	0	8	2	0	0	0	10	10.0	0	0	35	10	3	1	1	50	53.8
08:15 - 08:30	0	2	218	23	6	2	0	251	255.4	0	0	9	0	0	0	0	9	9.0	0	0	23	10	1	0	0	34	34.5
08:30 - 08:45	0	0	216	29	5	1	2	253	258.8	0	0	22	1	1	0	0	24	24.5	0	0	38	12	5	0	0	55	57.5
08:45 - 09:00	0	1	187	27	6	2	0	223	228.0	0	0	24	1	1	0	0	26	26.5	0	1	42	17	1	1	0	62	63.2
Hourly Total	**0**	**5**	**851**	**108**	**25**	**5**	**2**	**996**	**1014.0**	**0**	**0**	**63**	**4**	**2**	**0**	**0**	**69**	**70.0**	**0**	**1**	**138**	**49**	**10**	**2**	**1**	**201**	**209.0**
09:00 - 09:15	0	0	159	17	7	1	0	184	188.8	0	0	13	0	0	0	0	13	13.0	0	0	43	15	4	0	0	62	64.0
09:15 - 09:30	0	0	122	17	3	2	0	144	148.1	0	0	10	0	0	0	0	10	10.0	0	0	33	8	3	0	0	44	45.5
09:30 - 09:45	0	0	98	25	3	1	0	127	129.8	0	0	4	1	0	0	0	5	5.0	0	0	27	9	1	0	0	37	37.5
09:45 - 10:00	0	0	108	27	6	3	1	148	147.4	0	0	1	1	0	0	0	2	2.0	0	0	40	7	1	0	0	48	48.6
Hourly Total	**0**	**0**	**487**	**86**	**22**	**7**	**1**	**603**	**624.1**	**0**	**0**	**28**	**2**	**0**	**0**	**0**	**30**	**30.0**	**0**	**0**	**143**	**39**	**9**	**0**	**0**	**191**	**195.5**
TOTAL	**0**	**13**	**2122**	**323**	**70**	**17**	**6**	**2551**	**2606.3**	**1**	**0**	**105**	**9**	**2**	**0**	**0**	**117**	**117.2**	**0**	**1**	**375**	**138**	**26**	**3**	**2**	**545**	**563.3**
16:00 - 16:15	0	0	99	19	0	0	0	118	118.0	0	0	8	0	0	0	0	8	8.0	0	0	40	13	1	0	1	55	56.5
16:15 - 16:30	0	1	111	37	7	1	2	159	165.2	0	0	11	2	0	0	0	13	13.0	0	0	41	14	2	0	0	57	58.0
16:30 - 16:45	0	1	103	24	4	1	1	134	137.7	0	0	7	0	1	0	0	8	8.5	0	0	28	9	1	0	0	38	38.5
16:45 - 17:00	0	1	110	30	1	1	0	143	144.2	0	0	12	0	0	0	0	12	12.0	0	0	38	13	0	0	0	51	51.0
Hourly Total	**0**	**3**	**423**	**110**	**12**	**3**	**3**	**554**	**565.1**	**0**	**0**	**38**	**2**	**1**	**0**	**0**	**41**	**41.5**	**0**	**0**	**147**	**49**	**4**	**0**	**1**	**201**	**204.0**
17:00 - 17:15	0	0	150	22	0	0	0	172	172.0	0	0	4	6	0	0	0	10	10.0	0	1	31	5	0	0	0	37	36.4
17:15 - 17:30	0	0	113	19	1	1	1	135	137.8	0	0	8	1	0	0	0	9	9.0	0	0	43	2	0	0	0	45	45.0
17:30 - 17:45	0	0	131	16	2	1	1	151	154.3	0	0	7	0	0	0	0	7	7.0	0	0	34	5	0	0	0	39	39.0
17:45 - 18:00	0	0	110	12	2	0	0	124	125.0	0	0	3	1	0	0	0	4	4.0	0	0	35	2	1	0	0	38	38.5
Hourly Total	**0**	**0**	**504**	**69**	**5**	**2**	**2**	**582**	**589.1**	**0**	**0**	**22**	**8**	**0**	**0**	**0**	**30**	**30.0**	**0**	**1**	**143**	**14**	**1**	**0**	**0**	**159**	**158.9**
18:00 - 18:15	0	0	87	13	3	0	0	103	104.5	0	0	6	0	0	0	0	6	6.0	0	0	32	2	0	0	0	34	34.0
18:15 - 18:30	0	0	67	8	3	0	1	79	81.5	0	0	7	0	0	0	0	7	7.0	0	0	24	4	0	0	0	28	28.0
18:30 - 18:45	0	0	95	3	2	0	0	100	101.0	0	0	4	0	0	0	0	4	4.0	0	0	23	3	0	0	0	26	26.0
18:45 - 19:00	0	0	52	10	0	0	0	62	62.0	0	0	5	1	0	0	0	6	6.0	0	0	22	0	0	0	0	22	22.0
Hourly Total	**0**	**0**	**301**	**34**	**8**	**0**	**1**	**344**	**349.0**	**0**	**0**	**22**	**1**	**0**	**0**	**0**	**23**	**23.0**	**0**	**0**	**101**	**9**	**0**	**0**	**0**	**110**	**110.0**
TOTAL	**0**	**3**	**1228**	**213**	**25**	**5**	**6**	**1480**	**1503.2**	**0**	**0**	**82**	**11**	**1**	**0**	**0**	**94**	**94.5**	**0**	**1**	**391**	**72**	**5**	**0**	**1**	**470**	**472.9**

The TRICS Best Practice Guidance states

- “TRICS® is a very flexible system providing a large amount of survey data across a wide range of development types, therefore allowing great potential variation in the calculation of both vehicular and multi-modal trip rates. Therefore, it is quite possible that two users of the system, applying different filtering criteria and ranges to a task, may end up producing different results. This guide is intended to assist users in ensuring that correct procedures and understanding of the system are practised in the production of trip rate calculations, and is also intended to provide guidance to assist in the correct and thorough auditing of TRICS® data once it is received by third parties.
- There are many areas within the system whereby careful selection criteria and ranges are important in achieving robust and reliable trip rates. This guidance is designed to assist users in this task.
- The correct way to build a selection of surveys for the purposes of calculating trip rates is to decide initial inclusion criteria, and then filter the database using the various options provided by the system to provide a representative sample. The incorrect method is to produce trip rates to fit a pre-determined and preferred trip rate figure. This guidance, if followed correctly, will assist users in avoiding such incorrect, “pre-determined” methods.
- Recipients of data generated by TRICS® need assurance that the data has been produced in accordance with the guidance contained within this document. Therefore, it is the responsibility of all TRICS® users to ensure that full details of how data was obtained, along with clear indications of what the data represents, are provided to data recipients.”

Highways **have not** followed any aspect of the best practice guidance.

Highways **have not** audited the TRICS data received as the applicant has not published the TRICS data.

Highways **have not** validated that the initial inclusion criteria are correct.

Highways **have not** applied any assurance that the data has been produced in accordance with the guidance.

Highways **have not** validated full details of how data was obtained, along with clear indications of what the date represents.

End of Appendix 2