



ARCUS

TRANSPORT STATEMENT

NINFIELD GREENER GRID PARK

JULY 2021



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1 INTRODUCTION

1.1 Background

Arcus Consultancy Services (Arcus) has been commissioned by Statkraft UK LTD (the Applicant) to prepare this Transport Statement as part of the planning application for a Greener Grid Park facility (‘the Development’) on land to the north of Potman’s Lane, Ninfield (‘the Site’). The Site comprises agricultural grazing land located approximately 1.5 kilometres (km) to the east of Ninfield, immediately to the southwest of Ninfield Substation, as shown on **Figure 1** in Appendix **A**.

1.2 Overview of the Development

The Development is intended to provide services supporting the flexible operation of the National Grid and decarbonisation of electricity supply e.g., by balancing electricity supply and demand. The Development will import and export electricity but will not generate any additional electricity nor have any on site emissions of carbon dioxide. The proposed batteries will store surplus electricity to be fed into the grid when required, while the energy management modules will reduce fluctuations, thus improving stability and reducing the risk of power failures.

Greener Grid Parks of this type will be essential to enable the transition to low carbon/renewable energy, which tends to be intermittent and prone to fluctuation.

The Development will be accessed via the existing access track from Potman’s Lane.

2 LEGISLATION POLICY AND GUIDANCE

In preparing this Transport Statement the following guidance has been considered throughout:

Policy or Author	Title	Policy Description	Notes
Ministry of Housing, Communities and Local Government	National Planning Policy Framework (2019) ¹	The NPPF (2019) is the overarching national statement of the Government’s approach to planning. The document contains several paragraphs outlining policies in relation to transport provision for new developments. Paragraph 109 states: <i>“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”</i>	

¹ GOV.UK. 2019. *National Planning Policy Framework*. [online] Available at: <<https://www.gov.uk/government/publications/national-planning-policy-framework--2>> [Accessed 16 April 2021].

Policy or Author	Title	Policy Description	Notes
Ministry of Housing, Communities and Local Government	Guidance Travel Plans, Transport Assessments and Statements (2014) ²	Outlines the Overarching principles on Travel Plans, Transport Assessments and Statements	
Department for Transport (DfT)	Design Manual for Roads and Bridges (DMRB) – CD 123 ³	Details the geometric design standard for at-grade priority and signal-controlled junctions.	Has been used within this report to appraise the standard of existing infrastructure, in particular the Site entrance junction.
Institute of Environmental Management and Assessment (IEMA, 1993)	Guidelines for the Environmental Assessment of Road Traffic	Sets out guidelines for determining the appropriate and significance of traffic effects as a result of a proposed development. The following criteria should be applied for determining where further assessment is required: <ul style="list-style-type: none"> • Routes where traffic is predicted to increase by 30% or more; and • On highly sensitive routes where traffic is predicted to increase by 10% or more. 	This guidance is primarily intended to apply to Environmental Impact Assessments; however, the quoted thresholds are useful for determining where traffic increase may be significant.

3 EXISTING CONDITIONS

3.1 Highway Infrastructure

Construction traffic is expected to arrive via the A21 south of Baldslow. This assessment considers effects on routes between the Site entrance and the nearest major road, which in this case, is Potman's Lane.

3.1.1 A21

The A21 is a major road which runs in a north – south direction and connects London and various commuter towns to the south coast. Within the bounds of the study area, the A21 is a single carriageway road and operates at a 40 mph speed limit.

Construction traffic will exit the A21 at Junction Road heading for the A2690.

3.1.2 A2960

The A2690 is a single carriageway road, running from Hastings in the east to Bexhill in the west. The A2690 transitions between the national speed limit and a 40 mph speed limit several times along its route.

² The Ministry of Housing Communities and Local Government (2014) - Guidance - Travel Plans, Transport Assessments and Statements - Available at: <https://www.gov.uk/guidance/travel-plans-transport-assessments-and-statements> [Accessed 16/04/20]

³ Department for Transport - CD123 - Geometric design of at-grade priority and signal-controlled junctions - Available at: [http://www.standardsforhighways.co.uk/ha/standards/dmrb/vol6/section2.htm]

3.1.3 A2691

The A2691 is a single carriageway road which connects to the A2690 to the A269, bypassing the village of Sidley. The road transitions from a 30 mph speed limit up to a 40 mph limit for most of its length, before reducing to 30 mph again at its junction with the A269.

3.1.4 A269

The A261 is a single carriageway road which runs from the A259 at the coast, north to Lunsford's Cross.

The road operates at 30 mph through Lunsford's Cross before transitioning into a 40 mph speed limit.

3.1.5 Potman's Lane

Potman's Lane is a single carriageway road running northeast from the A269 to Church Road, southeast of Catsfield.

The road operates at a 30 mph speed limit as it passes through a residential area, before transitioning to the national speed limit at the bend prior to the Site access junction.

It is noted that a 'not suitable for HGV's' sign is present on this road at its junction with the A269. Upon inspection it has been concluded that the sign pertains to a section of Potman's Lane to the north of the Ninfield National Grid Substation, where it narrows significantly.

The presence of both the Ninfield substation and the solar farm approximately 0.5 km southeast shows that the segment of road contained within the study area has previously seen significant HGV and abnormal load use in the construction of these developments, and as such, the road has been deemed sufficient to carry HGV traffic for the short time frame associated with the Development.

3.1.6 Site Access Junction

The proposed Site access junction utilises an existing access point onto Potman's Lane that will require upgrading to safely accommodate HGV traffic. A visibility splay assessment (**Drawing No 3215-DR-ALR-0001** included in Appendix B) was undertaken using the minimum setback distance of 2.4 m for a simple priority junction. The results of this assessment indicated that the achievable splays are as follows:

- East splay = 215 m; and
- West splay = 174 m.

Potman's Lane in the vicinity of the access location is subject to the national speed limit. Therefore, a visibility splay of 215 m for a 60 mph design speed is required. It is acknowledged that the visibility splay to the west (174 m) is short of the required visibility envelope however, due to the proximity of point transitioning from a 30 mph limit to the national speed limit it is unlikely that traffic will be travelling at the 60 mph limit. A visibility splay of 174 m represents a characteristic speed of around 55 mph. Additional traffic management measures will be put in place during the construction phase as part of the site management plan to further mitigate the potential impact of construction traffic.

Following completion of the Development, this access will then be used for infrequent general Site maintenance and inspection which will be via LGV or 4x4 vehicles, typically less than once a week.

A swept path assessment (**Drawing No 3215-DR-ALR-0002** included in Appendix C) has been undertaken that demonstrates that the Site can be successfully accessed in a forward gear. It should be noted that the junction has been designed based on a standard HGV and will require re-design if it is decided that abnormal load vehicles are required for component delivery to the Site.

3.2 Baseline Traffic Flow Data

Existing traffic numbers within the study area was obtained from the Department for Transportation Traffic Count Database⁴. Four locations were identified along the route, with the most up to date counts being from 2019. **Error! Reference source not found.** highlights the values obtained from these counts while **Figure 3** in Appendix **A** shows the location of these traffic counts.

Table 3.1: Existing Annual Average Daily Traffic

Ref	Source	Road	Location	Year	Count Type	Total ADT	HGV ADT	HGV% of Total ADT
1	DfT	A2100	DfT Point ID: 91008	2019	Estimated using previous year's AADF on this link.	12,976	241	1.86%
2	DfT	A2690	DfT Point ID: 91006	2019	Estimated using previous year's AADF on this link.	19,706	365	1.85%
3	DfT	A2691	DfT Point ID: 91001	2019	Estimated from nearby links.	8,235	315	3.83%

3.3 Road Traffic Collision Assessment

A review of all reported historical road traffic collisions (RTCs) between the vicinity of access junction and the A269 was undertaken. Data was collected from publicly available RTC reports collated by crashmap.co.uk⁵. **Figure 2** in Appendix **A**, shows the locations of the noted RTCs.

This review indicated that no RTCs were recorded on Potman's Lane within the vicinity of the access junction, however two 'Slight' RTC's were noted at the A269/ Potman's Lane junction.

4 THE PROPOSED DEVELOPMENT

4.1 Construction Traffic Composition

Development construction traffic will primarily be associated with the importation of construction materials and Development infrastructure. It is expected that these materials will be transported to the Site by HGVs.

Other vehicles associated with construction of the Development can be expected from construction workers and other site personnel accessing the Site.

4.2 Construction Vehicle Routing

It is assumed that all deliveries will approach the Site from the A21. From the A21 the route to site will be as follows:

- Leave A21 onto Junction Road towards A2100;
- Continue along Junction Road, turning left onto A2100;
- Continue on A2100 for approximately. 0.5 km to roundabout;
- Turn left at roundabout onto A2690;
- Continue on A2690 (Queensway) for approximately. 2.9 km;
- Turn right at Junction to continue on A2690, following signage for A259;
- Continue on A2690 (Combe Valley Way) for approximately 3.7 km to roundabout;
- Turn right onto A2691;

⁴ UK Government, Department for Transport, Road Traffic Statistics. Available at: <https://roadtraffic.dft.gov.uk/#6/55.254/-6.053/basemap-regions-countpoints>. Accessed on [13/04/2021]

⁵ Study was undertaken using data compiled from www.crashmap.co.uk [accessed 16/04/21]

- Continue along A2691 for approximately 2.6 km to roundabout junction with A269;
- Turn right onto A269 (Ninfield Road);
- Continue along A269 (Ninfield Road) for approximately 0.8 km;
- Turn right onto Potman's Lane;
- Continue along Potman's Lane for approximately 0.64 km to Site Access Junction;
- Turn Left into Site Access.

Figure 1 in Appendix **A**, indicates the route to site.

4.3 Construction Traffic Volume

An indicative programme of anticipated construction traffic associated with the Development is provided in Table 4.2 and is expected to run for approximately 18 months. The following sub-sections detail assumptions made in estimating material quantities.

4.3.1 Site Mobilisation and Demobilisation

At the commencement of the project, plant, equipment and welfare facilities will be brought to the Site and the temporary construction compound will be formed. This is expected to require up to 15 HGV deliveries or 30 two-way HGV movements at the commencement of the project over a 1 month period.

Following construction, the Site would be demobilised. This is expected to result in the same number of vehicle movements as during mobilisation.

4.3.2 Access Track and Hardstanding

The proposed access track will take up an approximate area of 8,334 m² and will be formed at a depth of 0.45 m using Type 1 aggregate. This results in roughly 3,750 m³ of aggregate being required for this element of works.

Proposed hardstanding areas make up an area of approximately 8,317 m² and will be formed at a depth of 0.45 m using Type 1 aggregate. This results in roughly 3,742.6 m³ of aggregate being required for this element of works.

Approximately 7,493 m³ of aggregate will be imported to the Site via a 20T tipper lorry with an assumed volumetric capacity of 9 m³. This is expected to result in 833 vehicle loads or 1,666 two-way HGV movements spread across 3-4 months for this element of works.

4.3.3 Control Buildings, Substation and Electrical Cabling

Construction of the project will commence once the access tracks are complete. This will require materials, namely concrete, to be imported to form the foundations of the building structure, roof materials and internal electrical cabling. This is expected to result in 10 HGV loads or 20 two-way movements spread across 3-4 months.

4.3.4 Battery Container and Inverter Delivery

Battery containers will be delivered following the completion of the access tracks. The containers will be transported to site via standard HGVs resulting in 60 deliveries or 120 two-way vehicle movements across a 4-6 month period.

In addition to the battery containers, the associated inverters are expected to be delivered, resulting in a further 10 HGV Loads or 20 two-way vehicle deliveries.

4.3.5 Miscellaneous Items

Other items will be required to be delivered to Site as highlighted in Table 4.1.

Table 4.1: Miscellaneous Delivery Items

Miscellaneous Items	No. Units
Switchgear Containers	2 Units
Comms House	1 Units
Welfare Facilities Container	1 Units
Transformers (3m x 3m)	2 Units
Transformers (5.1m x 2.4m)	2 Units
Main Transformers	2 Units
13 kV Reactors	2 Units
Emergency Diesel Generator	1 Units
Coolers	4 Units
E Houses	4 Units
LV Switch House	1 Units
EMM's	2 Units

A total of 24 HGV loads have been assumed to deliver these items to Site, resulting in 48 two-way movements.

4.3.6 Staff

Staff levels are likely to remain consistent throughout construction. A conservative worst-case estimate of staff numbers has been made. It is assumed that an average of 130 two-way car/light van movement will be made to the site per day assuming COVID rules apply and car sharing is in place.

4.3.7 Fuel

Fuel for plant will be required on the Site regularly through construction, this is estimated to result in 4 HGV fuel tanker deliveries per month or 8 vehicle movements per month.

4.3.8 Foundations

Concrete will be delivered at various stages of construction to allow the construction of foundations. It is assumed that all concrete will be imported to the site as ready-mix via concrete wagon HGV. Rebar will be delivered by low-loader HGV.

Additional vehicle movements for the delivery of rebar will be required for each foundation element, a conservative assumption of an additional 2.5% of vehicle movements, rounded up to the nearest whole number of return movements, above those for concrete has been used.

A total of 333 loads has been calculated for concrete delivery, resulting in a total of 666 two-way movements across a 2-3 month period. A further 9 vehicle loads has been calculated for rebar delivery resulting in 18 two-way movement for a total of 684 two-way vehicle movements for this element of works, again across a 4-5 month period.

4.3.9 Overall Delivery Programme

Table 4.2 presents an approximate programme of vehicle deliveries over the duration of construction. The peak period of construction, from a traffic perspective has been identified as Month 1. An analysis of the impact of traffic during this period is provided in Section 4.4 of this Transport Statement.

Table 4.2: Approximate Programme of Deliveries

Activity	Month																		Total
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	
HGV Excluding Concrete																			
Site Mobilisation/Demobilisation	30																	30	60
Access Track and Hardstanding Construction	400	333	333	300	300														1,666
Control Building and Substation						5	5	5	5										20
Electrical Cabling Delivery									4										4
Battery Container Delivery & Inverters										25	25	25	25	20	20				140
Miscellaneous Delivery										8	8	8	8	8	8				48
Fuel Delivery	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	8	144
Sub-Total	438	341	341	308	317	13	13	13	17	51	51	51	41	41	41	8	8	38	2,082
Concrete Delivery																			
Concrete Delivery										137	137	137	137	136					
Sub-Total										137	137	137	137	136					684
Staff Cars and Vans																			
Staff	100	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	100	
Sub-Total	100	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	130	100	2,280
Total (All Vehicles)	538	471	471	438	447	143	143	143	147	308	308	308	308	302	166	138	138	138	5,046
Total (HGV Only)	438	341	341	308	317	13	13	13	17	178	178	178	178	172	36	8	8	38	
Total Traffic Daily Average (26 Day Month)	21	18	18	17	17	6	6	6	6	12	12	12	12	12	6	5	5	5	
HGV Traffic Daily Average (26 Day Month)	17	13	13	12	12	1	1	1	1	7	7	7	7	7	1	0	0	1	

The Development is expected to be constructed over an 18-month period. Approximately 5,046 vehicle movements are expected to occur during this period for staff, and to deliver construction materials and components

4.4 Assessments of Traffic Effects

4.4.1 Peak Increase in Traffic

As indicated in Table 4.2, the peak month for construction is expected to occur in Month 1. During this month there are 538 two-way movements, made up of 100 car/van movements and 438 HGV movements. Assuming a 26-day working month, this would equate to a maximum of 21 two-way movements per day which would consist of 4 car/van movements and 17 HGV movements on average.

4.4.2 Effect of Traffic Increase during Construction

The percentage change in traffic volume expected during the peak month of construction was calculated for each of the traffic count locations identified in the baseline study.

Table 4.3 indicates the predicted change in average daily flow ('ADF') in Month 1.

Table 4.3: Increased Traffic Generation due to Construction Vehicles

Ref	Total Vehicles			HGV Only*		
	Baseline	Baseline + Development	% Increase	Baseline	Baseline + Development	% Increase
1	12,976	12,997	0.16%	241	258	7%
2	19,706	19,727	0.11%	365	382	5%
3	8,235	8,256	0.26%	315	332	5%

The lowest threshold of impact for traffic generation at sensitive receptors is typically 10%. As indicated in Table 4.3 above, the temporary increase in Average Daily Traffic Flow ('ADTF') due to total construction traffic and HGV is less 10% at the referenced traffic points. Therefore, the increase in traffic generation due to construction traffic is therefore negligible and not significant.

4.4.3 Effect on Highway Safety

No hotspots were identified in relation to RTCs. The increase in traffic flow due to construction of the development has been assessed and was found to be not significant. As such this will have no impact on highway safety.

4.4.4 Operational Traffic

Vehicle movements to the Site during the operation of the Development will comprise activities associated with inspection, monitoring and general site up-keep but the site overall will be unmanned during operation. It is anticipated that such visits will occur up to once per week on average and be via van or other similar sized vehicles.

Due to the very low numbers of vehicle movements anticipated it is unlikely that the operation of the Development will have any significant impact on the road network. The Site is not intended to attract visitors for any reason, and therefore it is not anticipated to generate other types of trips.

The effect of operational traffic is therefore expected to be negligible.

4.4.5 Cumulative Traffic

Following a review of proposed developments which have the potential to result in cumulative traffic and transport effects and for which construction traffic will utilise the same road network as the Development, the following developments were identified:

- Battery electrical storage scheme (Planning Ref: RR/2020/1817/P). Consented and could potentially have similar construction timescales and utilise similar construction routes.

In order to assess the cumulative effect of the possible simultaneous construction on the local road network, the peak traffic period for each development has been combined to give an overall peak traffic estimate. It should be noted that the below estimate is a worst-case scenario assumption in which the peak periods of each development coincide, though in reality, this is unlikely to occur.

It is anticipated that during construction, the maximum number of vehicles accessing the proposed Greener Grid Park during the peak construction phase would be 8 HGVs per day. Therefore, in line with the conclusion of Section 4.4.2 of this report, it is considered that the effect of cumulative traffic levels on the local road network would be negligible.

A Construction Traffic Management Plan (CTMP) will be prepared for submission prior to the commencement of construction, the requirement for which could be secured by an appropriately worded planning condition. The CTMP will provide specific timings of construction phases, including in relation to the other nearby battery storage scheme, and will detail any measures required to avoid conflict between peak construction periods.

5 TRAFFIC MANAGEMENT

A number of traffic management procedures will be implemented to ensure safe operation of routes within the vicinity of the Site.

Once appointed, the Principal Contractor will be responsible for implementing specific traffic management policies and procedures. The following sub-sections of this report will outline the general management procedures which will be implemented.

5.1 Route to Site

Drivers of all delivery vehicles will be made aware of the approved route to the Site, and any restrictions. Drivers of HGVs and other vehicles will be made aware that only the approved route is to be used and that access from non-approved routes is prohibited.

5.2 Temporary Warning Signage

The use of temporary traffic signs will be limited to advisory signage such as 'Heavy Plant Crossing' and 'Site Access' signs. These will be placed on approach to the site access junction onto Potman's Lane.

5.3 Management of Approach Route to Site

During construction, the contractor should consider the frequency of vehicle movements, the forward visibility for approaching vehicles and the anticipated pedestrian demand when designing control measures. As a minimum, this would involve installation of appropriate signage for pedestrians and vehicles.

Given the low overall volume of construction traffic and the suitability of the approach routes to site for carrying such traffic no other management measures other than those listed above and in the other sub-headings of this section are considered to be necessary.

Given the low volume of vehicles expected to use the access road during the operational phase an uncontrolled crossing point, with appropriate signage, is likely to be sufficient given adequate forward visibility for approaching vehicles.

5.4 Wheel Washing

If required, in order to prevent the deposition of mud on the public highway, the Principal Contractor will install and operate wheel washing facilities at the site entrance junction. These facilities will remain in place for the duration of the construction phase of the Development.

5.5 Construction Traffic Management Plan (CTMP)

Prior to the commencement of construction works on site, a CTMP will be prepared and submitted to the local authority for approval. This CTMP will provide specific timings of construction phases and will consider in more detail the specific details of how construction of the Development will coincide with construction of other consented Battery Storage Development.

5.6 Enforcement

Drivers of site and construction traffic vehicles will be aware of the route and contingency measures as explained during the site induction period. Emphasis will be made to Health & Safety with regards to traffic management. Site staff/operatives/visitors will fully be inducted by site management and will be present in daily briefings. Drivers of HGV's will be provided with the Traffic Management Plan in advance of their visit to site in addition to the induction they will receive once onsite and good road practice will be made clear prior to any traffic movements.

- The contractor will be required to implement induction procedures and promote road safety and awareness; and
- Where possible, arrangements will be made for site workers to share transport and minimise unnecessary traffic movements locally, COVID rules depending.

The site access junction will be kept clear at all times and on-site staff will ensure no vehicles attempt to use this for parking.

All contractors will be monitored (through regular spot-checks) to ensure they follow correct routes. Routes identified will be clearly defined in all sub-contracts and clearly communicated to drivers. Any contractor not adhering to the relevant route guidance and any other measures detailed in the Traffic Management Plan will be disciplined and may be removed from the project; this will be contractually specified where practical to do so.

6 CONCLUSION

This Transport Statement has considered the likely impact of traffic generated by the Development on the local transport network. A detailed review of the type and quantity of vehicles associated with each element of the construction project has been provided along with an approximate programme of construction. The route to Site for all construction traffic has also been provided.

Access to the Site will be via an existing access point off Potman's Lane that will require upgrading to safely accommodate HGV traffic. A visibility splay assessment has been undertaken that demonstrates that the visibility splay at the site entrance junction does not fully meet the required DMRB visibility splay for the measured road speed to the west. The visibility splay to the west is 174 m (short of the required 215 m), however, due to the proximity of the transition between a 30 mph limit to the national speed limit it is unlikely that traffic will be travelling at the 60 mph limit. A visibility splay of 174 m represents a characteristic speed of around 55 mph. A number of traffic management procedures have

been proposed within this report which would ensure the safe operation of the site entrance junction during operation and construction. Determination of the final details of these traffic management measures will occur once the Principal Contractor has been appointed. These traffic management procedures would allow the junction to operate safely during construction and operational phases of the Development. A swept path assessment has been undertaken that demonstrates that the Site can be successfully accessed in a forward gear.



Construction of the Development will generate approximately 5,046 vehicle movements during the 18-month construction period. It is expected that during the peak month of construction (Month 1), 21 two-way vehicle movement per day will occur per day, which would consist of 4 car movements and 17 HGV movements on average.

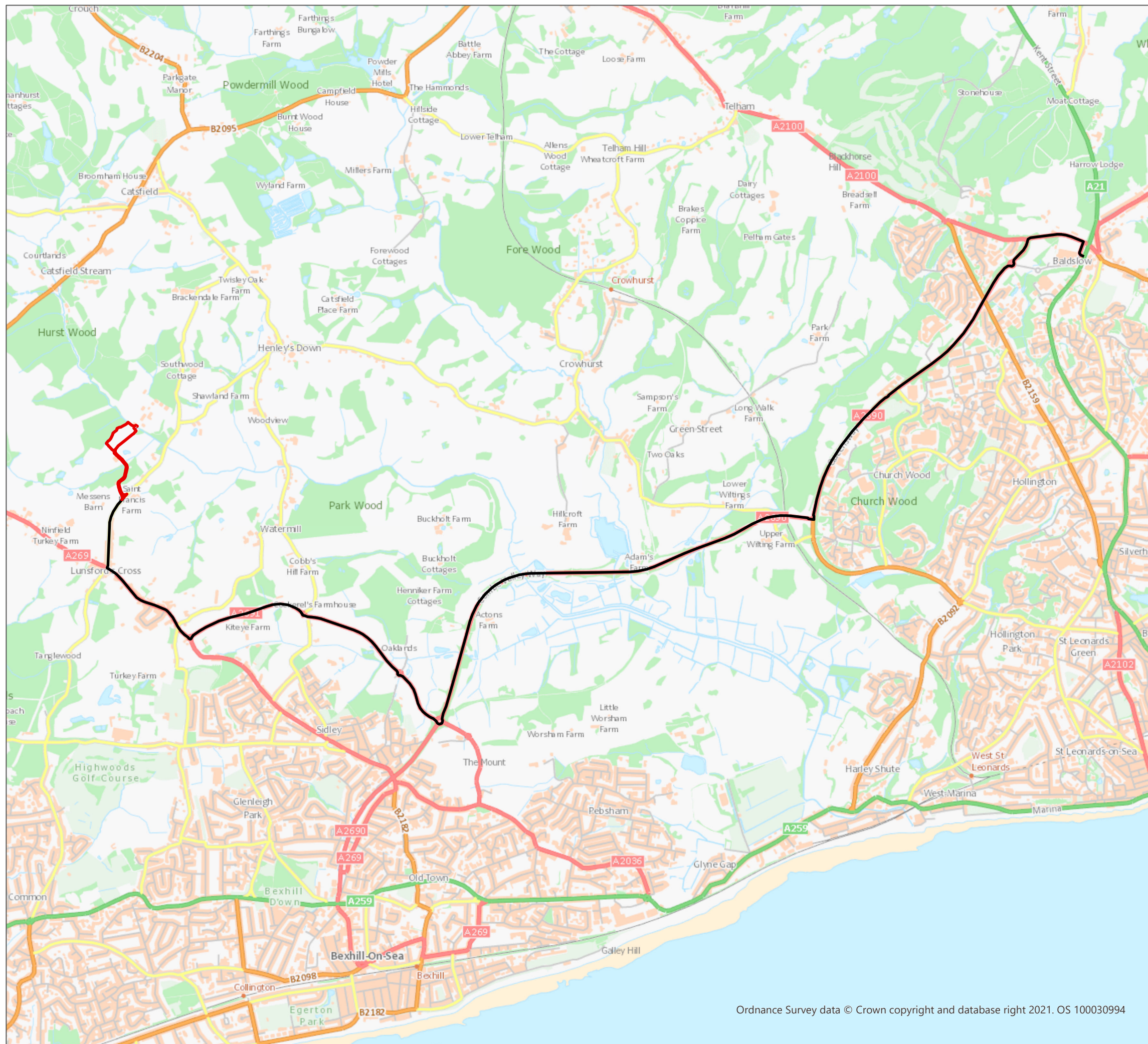
The increase in traffic generation due to construction traffic was calculated using baseline traffic data from the DfT website to be less than 10% at all the traffic count points. Due to this and the temporary nature of the works, the impact on traffic generation due to construction is therefore not significant. Consideration has also been given to potential cumulative traffic impacts associated with construction of the consented Battery Storage Development in the vicinity of the Site. In the worst-case scenario where construction programmes overlap, impacts are still found to be not significant.

Traffic management procedures have been proposed within this report which would ensure the safe operation of the approach route to the Site during construction. Determination of the final details of these traffic management measures will occur once the Principal Contractor has been appointed and can be secured via an appropriately worded condition of consent.

Operational traffic is expected to be minimal as the site is unmanned and would be conducted by smaller vehicles. The impact of this on the wider highway network is therefore expected to be negligible.

APPENDIX A – FIGURES

 Route to Site
 Site Boundary



1:30,000 Scale @ A3
 0 0.5 1 km 

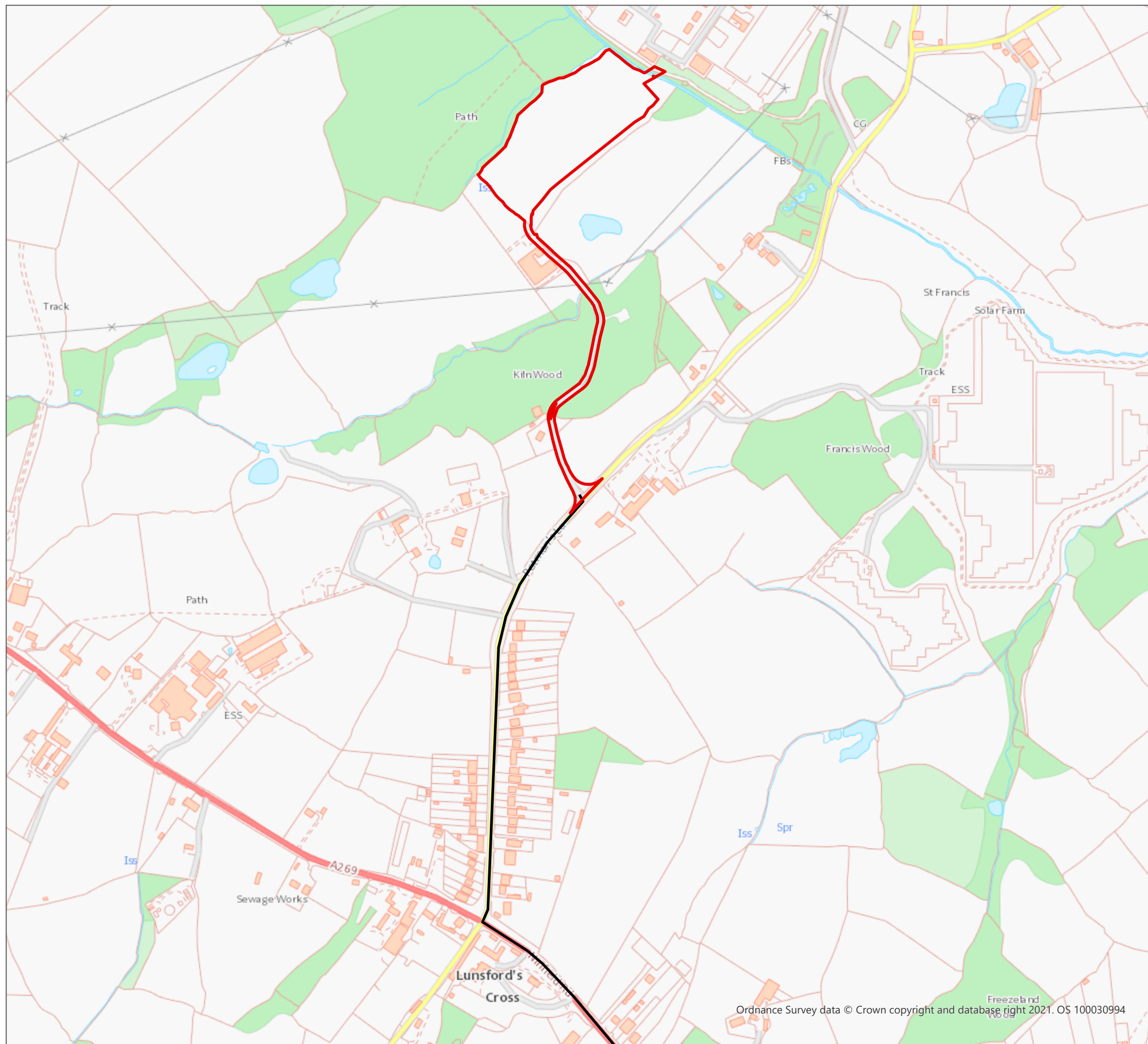
Produced By: BM	Ref: 3215-REP-029
Checked By: FO	Date: 22/06/2021

Route to Site
Figure 1



**Ninfield Greener Grid Park
Transport Statement**

Ordnance Survey data © Crown copyright and database right 2021. OS 100030994

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- Site Boundary
- Route to Site
- Road Traffic Collision (RTC) Assessment Severity
- Fatal
- Serious
- Slight

1:5,000 Scale @ A3



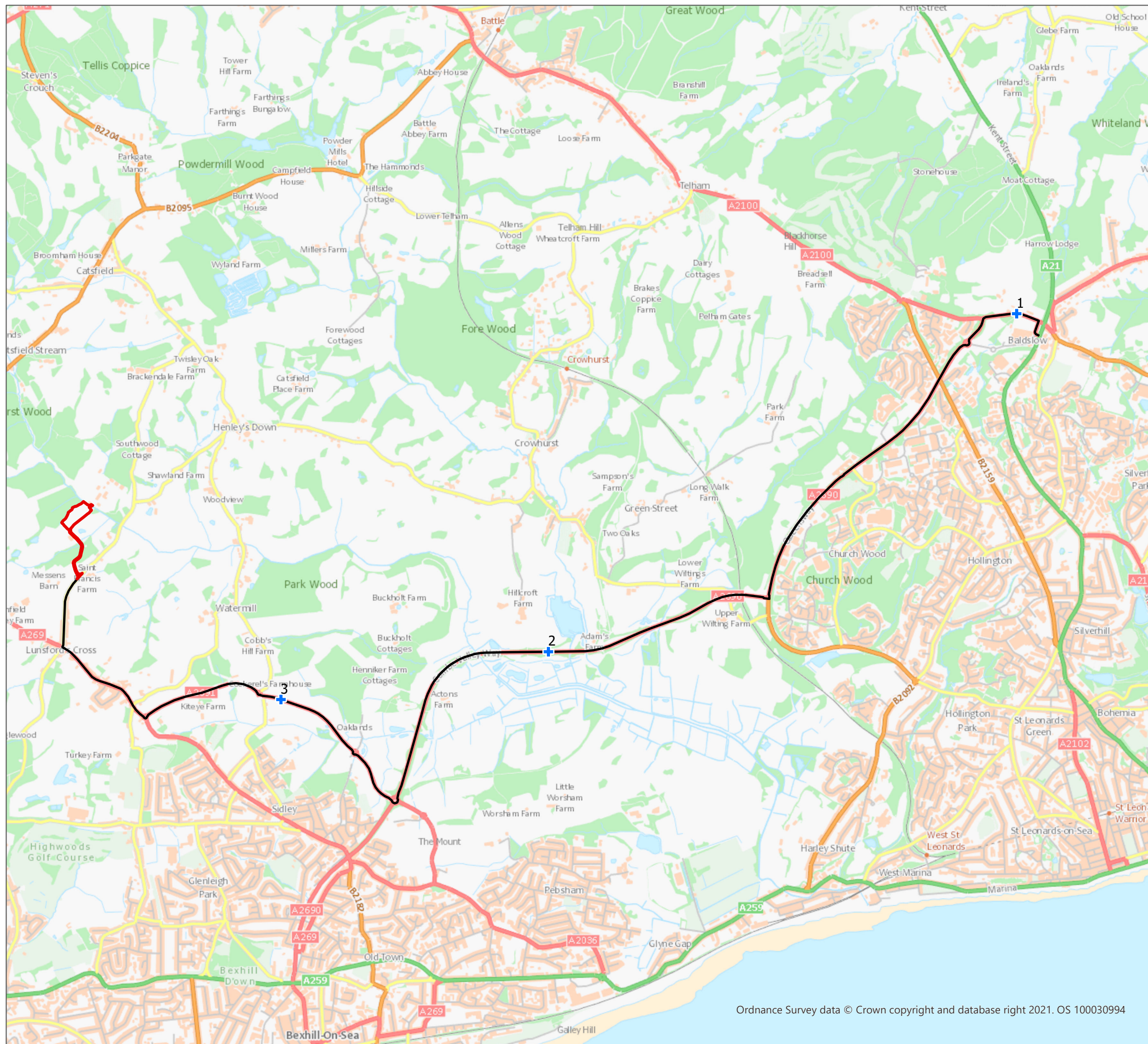
Produced By: BM	Ref: 3215-REP-030
Checked By: FO	Date: 22/06/2021

**Road Traffic Collision (RTC)
Assessment
Figure 2**

**Ninfield Greener Grid Park
Transport Statement**

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- Site Boundary
- Route to Site
- + Traffic Count Locations



1:30,000 Scale @ A3

Produced By: BM	Ref: 3215-REP-031
Checked By: FO	Date: 22/06/2021

Traffic Count Locations
Figure 3

**Ninfield Greener Grid Park
Transport Statement**

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APPENDIX B – VISIBILITY SPLAY ASSESSMENT

APPENDIX C – SWEPT PATH ANALYSIS