

## **SLR Consulting Limited**

#### St Modwen Homes

Lodge Farm, Rugby

SLR Project No.: 407.064532.00001

2 February 2024

Revision: 4

#### RE TRANSPORT OVERVIEW

## 1.0 Introduction

- 1.1 SLR Consulting Limited is engaged by St Modwen Homes to provide a desktop review of Transport and Mobility overview relating to a new settlement proposal known as Lodge Farm, located in Rugby Borough.
- 1.2 A smaller site on land to the south of the A45 was previously included as a draft allocation (Policy DS10) for 1500 homes with a primary school and local centre (104 Ha) within the now adopted Rugby Local Plan, however, was subsequently removed by the Inspector during Independent Examination.
- 1.3 Rugby Borough Council (RBC) are presently consulting on their Issues and Opportunities Plan and this Technical Note seeks to provide an overview of the following items:
  - A summary of the Inspector's comments (May 2018) and Report to PINS (March 2019) on the Examination of the RBC Local Plan 2011-2031;
  - A sense check of the previous Transport Strategy (relative to the Inspector's Decision);
  - A sense check of the current masterplan (a larger development than previously promoted with a greater mix of uses);
  - A view on direct vehicular access onto the A45 a National Highways (NH)
    Diversionary route; and

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A view on highway capacity.

## 2.0 Background

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2.1 St Modwen Homes previously promoted a smaller scheme for Lodge Farm for inclusion within the RBC Local Plan and numerous technical documents were prepared including a Vision and Delivery document (Nov 2016) and a Transport Strategy Report (Sept 2017).



- 2.2 After previously receiving a draft allocation, the site was removed from the Local Plan following the Examination of the RBC Local Plan and Inspector's post Hearing letter (May 2018) setting out main modifications. The Inspector's specific reasons for this judgement were set out in greater detail in the Inspector's Report March 2019.
- 2.3 The principal basis for removing the draft allocation was based on overall lack of housing need in the Plan. The Inspector did also raise concerns over other matters including transport and accessibility.

## 3.0 Summary of Inspector's Report to PINS March 2019

- 3.1 The key themes / comments relating to the perceived failure against policy (National Planning Policy Framework (NPPF)) in terms of transport and mobility (accessibility and sustainability) included:
  - It is not a location where the need to travel would be minimised and circa 40% of external journeys projected to be made to smaller settlements / destinations where there is no transport choice but to drive;
  - Insufficient evidence to suggest that journeys by bus to Rugby, Daventry and beyond e.g., Coventry would be commercially viable to a bus operator;
  - o Dismissal of proposed cycle routes on the basis of distance and gradient;
  - Insufficient critical mass/facilities and transport infrastructure to have a positive effect on the viability of adjacent rural communities
- 3.2 In summary, the Inspector on balance concluded the proposals for Lodge Farm as presented would be unsustainable as a Main Rural Settlement. Notably however, the Inspector concluded that the site of 1500 homes could be accommodated within the local and strategic highway network in terms of safety and capacity on the basis of infrastructure provided by others such as the Dunchurch bypass.
- 3.3 It is also worth noting that the gravity model prepared in support of the site promotion may not have been helpful in the context of the Inspector placing significant weight on 40% of trips being forecast to smaller settlements with reducing amounts of modal choice. This is addressed later within this report.
- 3.4 The Inspector's concerns relating to sustainable mobility were based on policy expectations at this time and the relevant weight afforded by policy for movements by private car compared to other modes of travel.
- 3.5 It was not at the time of the decision to exclude this site from the LDP, and is currently not the purpose of planning policy, to ensure that transport infrastructure proposed creates modal shift for all users, for all journey purposes and to all destinations. This was not the approach taken by the Inspector.
- 3.6 Contemporary Planning Policy as set out in NPPF (Dec 2023) **seeks to encourage** social interaction and health benefits through placemaking and active travel and modal shift by



promoting walking, cycling and public transport and securing these via legal agreements. Compared with the position in 2018/2019, there is now more of a step change shift in balance in considering travel and mobility from development in line with Climate Emergency. In other words, we are no longer designing for the car.

- 3.7 The NPPF also provides distinction about decision making in urban and rural areas recognising that sustainable transport solutions will vary depending on where a site is located.
- 3.8 It would appear that the Inspector has placed limited weight on the sustainability proposals for this Main Rural Settlement site instead choosing to focus on distances to major settlements, comparable journey times between proposed bus improvements and car journeys and gradients for active travel. Planning Policy doesn't stipulate a pass or fail test in relation to comparison of journey times between alternative modes of travel and private car journeys and nor does it stipulate that active travel measures should be dismissed because there are topological challenges on part of a route, or because they are not capable of being delivered offroad.
- 3.9 Contemporary Policy also doesn't stipulate that funding for new bus infrastructure should be in perpetuity. Stagecoach have previously gone on record to support proposals for a 'gold star' 20-30 minute bus service between Rugby-site-Daventry Mon/Fri. Moreover, the proposals previously developed in 2017/2018 did not account for the joined up benefit to be realised from such a service of other strategic land in south/southwest Rugby and any ancillary benefits the existing underlying hamlets and employment (e.g., HMP Onley) who have no bus services.
- 3.10 There is now an opportunity to re-engage with Stagecoach to develop the proposals for a new bus service for Lodge Farm and this will be set out in further representations.

# 4.0 Sense check of previous Transport Strategy and Accessibility Statement

- 4.1 The Transport Strategy (2017) and Accessibility Statement (2018) set out the component parts/ proposals relevant to mobility infrastructure required to support development of this nature.
- 4.2 This section addresses each of the component parts in turn. The traffic forecast, modelling and impacts are covered within a separate section (Section 7) of this report although this aspect was not criticised by the previous Inspector.

#### **Vehicular Access**

4.3 Vehicular access to the site south of the A45 was previously proposed within the Transport Strategy (2017) document from two roundabout junctions with the A45. There is no reason to doubt, based on the previous preliminary designs prepared, that these access points can be created safely as per DMRB design guidance/standards.



4.4 Given the frontage of the site there are likely to be various vehicular access options available. This includes options for access to land to the north of the A45. Further commentary on the access strategy relative to the A45 (NH Diversionary route) is set out in Section 6.

## **Public Transport - Bus Strategy**

- 4.5 The 2017/2018 bus strategy clearly sets out proposals to deliver a new 'gold star' bus service on the A45 between Daventry, the site and Rugby with a 30 min frequency Mon Fri and an hourly service on Sundays.
- 4.6 The proposal to provide a direct bus link between the site and Ruby/Daventry complies with the draft Policy DS10 and importantly, the previous representations made it very clear that the development would fund such a service until it became commercially viable a prerequisite from Stagecoach.
- 4.7 In addition, various alterative bus route options were developed within the 2018 Accessibility Statement including journey time comparisons between bus and car journeys to Rugby. These are useful in demonstrating that journey time should not be a material factor in any decision making relating to the appropriateness of the site.
- 4.8 The Bus Strategy will be updated to reflect the current proposals for a larger site with a greater mix of uses.

## **Cycling Strategy**

- 4.9 High Level proposals were previously set out to fund a new cycle route between the site and Dunchurch and the existing cycle facilities/infrastructure in Dunchurch which would then tie into Rugby town centre and railway station via NCN Route 41.
- 4.10 These proposals will be updated and embellished to reflect the proposed changes to the Masterplan

#### Sustainability

- 4.11 The Accessibility Statement prepared in 2018 sets out how the proposals comply with sustainable transport policy at that time, specifically comparing proposed trip lengths for bus/cycle with the National Transport Survey 2017 statistics to demonstrate that the measures proposed offer real transport choice.
- 4.12 Comparisons were also made between similar sites/locations of development (Meon Vale, Longford and Alderman's Green) relative to other key settlements such as Stratford and Coventry.
- 4.13 Whilst each site should be treated on its own merit, reference to the National Transport Survey demonstrating travel patterns at that time provides sufficient evidence to overcome



objections relating to propensity and distance of journeys to be made by alternative modes of travel.

## **Proposals to enhance Transport Strategy**

- 4.14 In order to bolster previous work undertaken in support of this site with respect to transport and mobility and to align more comprehensively with the Council's Climate Change Emergency (November 2022) and agenda i.e., reaching Net Zero by 2030, additional transport initiatives are proposed
- 4.15 The options for travel by bus will be reviewed and updated through extensive discussions with Stagecoach. This optioneering exercise may also include Demand Responsive Transport (DRT) to provide greater flexibility / route choice etc. This additional work will set out and indicative level of funding/duration (irrespective of fare box revenue) and commitment to ensuring the proposals are self-sustaining including, where possible, the inter relationships with development land south/southwest of Rugby. It is recommended that the full bus service is delivered within the first phase of any development occurring rather than in stages as set out previously. This will ensure that early decisions relating to movement requirements are not compromised.
- 4.16 The Council's ambition is to have Rugby Parkway Station open to passengers in 2026 subject to funding and consents. Given it is now 2024, this seems very ambitious but nonetheless, the future timeframes for a station at this location are likely to coincide with a start on any future development on this site i.e., 3-5 years.
- 4.17 The Transport Strategy will now include the potential benefit of Rugby Parkway train station (public consultation Jan-Feb 2023). This analysis will include an Active Travel route study (e.g. including Oxford Canal Walk) to this potential new mass transit infrastructure. This will have a significant bearing on the sustainability of this site and development of this scale linked to this new transport infrastructure would also add weight to the business case for the new train station.
- 4.18 Additional analysis ought to include developing the public transport strategy to include bus services to both Rugby Parkway and Rugby train stations. The benefits of doing this are demonstrated within the accessibility modelling using TRACC software. The outputs from this exercise are shown in **Appendix A.** These include base scenarios (AM 0700-1000 & PM 1600-1900) for bus and rail combined accessibility to/from the site and a comparison to show the change in accessibility in these peak periods based on the public transport strategy proposed in the Transport Strategy Report (but extended to include services to Rugby train station) together with a new service to Rugby Parkway station.
- 4.19 In summary, the TRACC modelling demonstrates the accessibility benefits of a Daventry to Rugby train station bus service;
  - Rugby train station and Rugby Parkway stations would be within 30 mins of the site;



- Linking the site to both train stations increases accessibility to other areas significantly for example one can travel as far south as Watford within 90 mins and as far north as Tamworth and Wolverhampton in 90 mins.
- Accessibility to the surrounding areas increases significantly with quicker access to Rugby train station, i.e., the West Coast Mainline allows for access to Tile Hile, Berkswell and Hampton-in-Arden and other areas between Coventry and Birmingham.
- The inclusion of Rugby Parkway station increases accessibility to include Northampton, Coventry, Warwick and Birmingham International.
- 4.20 A development with an increased number of dwellings and scope to provide a more diverse mix of uses will assist in ensuring that this site becomes more sustainable from a transport and mobility perspective. Additionally, the revised masterplan with a greater mix of uses including a secondary school and opportunities to provide doctor, dentist, fitness facilities as well as employment i.e., improved placemaking, has the ability to contain trips which would otherwise be mad external to the site. This approach to placemaking will materially affect the previous forecasts of trip distribution which were based on a Gravity model.
- 4.21 In addition to the above, the updated Transport Strategy will also include additional measures to promote sustainability mobility and to encourage modal shift;
  - Car clubs
  - Mobility hubs
  - Micromobility
  - Personal Travel Planning initiatives for the site and adjacent communities
  - E Bike Hire to compliment the cycle routes proposed and for those potential users who could be influenced by distance or topography.
  - Travel Planning

## 5.0 Lodge Farm Proposals

- 5.1 The Draft Masterplan in its current iteration (DE\_507\_101, **Appendix B**) sets out greater critical mass of development on the site, importantly showing development on both sides of the A45. The point of Active Travel connection between both sides of the site and treatment, character and crossing of the A45 will be an important element of detail and any future information submitted in support of this site will need to detail how this interface with the A45 (and its change in nature) will work in practice.
- 5.2 The development is now proposing some 2,680 homes, a secondary school, two 2 FE Primary schools, a mixed innovation quarter, neighbourhood hub and garden village centre.
- 5.3 Whilst traffic capacity will still need to be addressed, the greater critical mass as now proposed, creates significantly enhanced Placemaking opportunities and more opportunity for local living and local trips to be kept internal within the site.



- As part of the updated Masterplan, consideration will be given to specific village uses within the site e.g., local convenience store, doctors, dentist, fitness facility which are all important component parts in terms of local living and creating places where the need to travel externally for day-to-day activities can be reduced.
- 5.5 The greater critical mass in relation to housing numbers also enables funding for the transport proposals as set out above and the public transport provision to be further enhanced.

## 6.0 Direct vehicular access onto the A45

- 6.1 As per the original masterplan proposed within the Draft allocation, vehicular access is proposed directly via the A45.
- 6.2 The previous masterplan proposed vehicular access via two roundabouts to development on the southern side of the A45. These roundabouts were designed to DMBRB standards and would effectively change the character of the A45 at this location.
- 6.3 The current masterplan (**Appendix B**) prepared in response to comments made by the Inspector, proposes vehicular access both north and south of the A45, again changing the character of the A45 at this location. The current speed limit of the carriageway is 50mph and with the proposals, this relatively short section of A45 would operate within, or below 30mph with appropriate gateway features on the northbound and southbound carriageway.
- 6.4 It is understood that the A45 at this location, whilst not being a Trunk Road, is a NH Diversion route. Providing there are no technical or policy reasons not to provide direct vehicular access at this location, then the proposed vehicular access from the A45 would be appraised in the same way as any other road. Based on the work undertaken to date by others, there are unlikely to be any technical (design) issues as to why direct vehicular access cannot be achieved from either side of the A45.
- As set out above, the detail and proposed character changes of the A45 at the location of the development and access to the north and south should be developed in detail to provide confidence that the two sides of the site can work together for vulnerable road users and that the change in character of the A45 can be developed outside of the site boundary through speed/village gateway features or similar.

## 7.0 Highway Capacity

7.1 As part of the evidence review, the status of the original traffic modelling completed in support of the Lodge Farm development proposals, alongside RBCs wider Local Plan aspirations, has been reviewed.



## **Background**

- 7.2 The original modelling completed to support the Local Plan was documented within the 2017 Strategic Transport Assessment (STA). That work included the Lodge Farm proposals within the housing allocation assumptions, albeit for 1500 dwellings. This was part of the circa 10,000 dwellings tested within the modelling work.
- 7.3 The modelling identified several transport schemes which it was considered would be required to support the delivery of the housing identified through RBCs Local Plan. These were listed within Table 17 of the original STA as well as Table 8-1 of the Transport Strategy Report which also reported the likely development trigger for each of the schemes that was identified within the STA. A significant number of these schemes have since been secured.
- 7.4 The most important proposal identified through the Local Plan assessment work was the South West Link Road (SWLR) which was intended to serve as both the primary distributor link for the developments allocated within SW Rugby as well as providing an opportunity for traffic to bypass Dunchurch which was previously identified as an area of significant constraint to traffic movement.
- 7.5 The Inspector accepted the work presented within the STA and concluded that it demonstrated the impacts on the transport network of the proposed Local Plan, as well as Lodge Farm specifically, could be mitigated. Therefore, the proposed highway schemes were appropriate and accepted.

## **Assumptions**

- 7.6 The core assumptions within the STA assumed that Lodge Farm was to be built out to 1500 dwellings. The trip distribution patterns were informed via a gravity modelling approach and the trip generation assumptions were agreed with WCC based on donor trip rates collected from an established, but smaller community, Caston Lane Rugby.
- 7.7 The Traffic Modelling was derived from a 2016 Base model which was updated to specifically ensure that traffic flows within the model, at the time the Local Plan was being assessed, were representative of observed conditions. Traffic forecasting was completed in line with TAG guidelines and growth forecasts were extracted from TEMPro for the intervening assessment periods. At the time this would have involved the use of TEMPro V7.2.
- 7.8 At each stage of the Local Plan assessment, highway interventions were included to aid the delivery of the proposals and facilitate the associated traffic growth. The nature of the assessment work at that time is such that the focus of all schemes was on delivering additional highway capacity to accommodate the new trips i.e., Predict and Provide. This is a marked difference to how Local Plans are now assessed and is discussed later within this note.



#### **Implications on Future Assessments**

- 7.9 Each of the assumptions listed previously will have a material impact on any future stages of assessment which are completed along the same lines as the original Local Plan assessment work on the following basis:
- 7.10 Revisiting trip generation estimates based on newer survey data for a proxy development or updating it using the latest assumptions around travel patterns would provide a more realistic estimate of travel demand for the development proposals. Almost certainly this would also reduce the level of trip generation predicted to occur.
- 7.11 Similarly, we recommend that the use of a gravity model to inform trip distribution patterns is reviewed. Gravity models have a tendency to introduce bias towards longer distance trips and assume relative attractiveness based on simple parameters (e.g. the presence of employment sites). They do not take account of local factors such as whether the employment type is likely to be appropriately attractive to people living in Lodge Farm. Updating these assumptions may reduce the propensity for long distance trips to be predicted as well as the large proportion of dispersed trips (i.e. to rural destinations) which was previously a concern with regards to sustainable travel opportunities.
- 7.12 The 2016 traffic model will not account for significant factors that have influenced travel demand since that time. The most notable of which is the lasting effects of the pandemic and the prevalence of working from home since that time. It is generally recognised that traffic patterns have changed since the pandemic and, in their latest release of TAG guidance, DfT recognises this and recommends that these changes are reflected within any traffic modelling to ensure that any conclusions drawn from the modelling can be considered valid. Our understanding of traffic patterns within this area is that the current 2023 traffic volumes are similar to those reported within the 2016 model. Traffic growth has simply not materialised to the extent that was predicted when the previous Local Plan work was being undertaken. If these changes were considered within the updated modelling, then it would almost certainly be the case that the level of residual capacity predicted to exist within the model network would be higher than predicted within the model at the time the STA was completed.
- 7.13 The update to TEMPro provides a significant opportunity to revisit the traffic forecasting exercise and account for the revisions to future economic and population growth, issued by the Office of National Statistics (ONS) in 2018, as well as local planning projections. Additionally, the Common Analytical Scenarios now available in TAG provide the opportunity to revisit the traffic forecasts beyond simply considering 'business as usual'. The Core scenario (which is DfT's best guess about the future) is recognised by DfT as representing a warning that unless policies align with the Net Zero commitment then decarbonisation will not be achieved. The Technological and Behavioural Common Analytical Scenarios provide an opportunity to revisit this and understand how the network may operate in the future if policies and behavioural changes required to achieve Net Zero are successful. Any future forecasting should consider these different growth projections in order that one can establish how necessary any highway intervention scheme is likely to be if wider policy objectives are successful. Arguably it is the scenarios which enable decarbonisation to be accounted for which we should planning for when assessing the implications of Local Plans moving forward.



7.14 Revisiting the Lodge Farm assessment with these principles in mind would not only present a more realistic (and less pessimistic) picture of how the network will operate in the future, it would also serve to demonstrate a reduced reliance upon the delivery of additional highway infrastructure compared to the work completed to date.

## **Infrastructure Requirements**

- 7.15 A major issue which was discussed at length during the previous Local Plan hearings was the operation of Dunchurch Crossroads. This is a junction which is currently over capacity and represents concern in safety and air quality terms if no further action is undertaken.
- 7.16 It is also accepted that the scheme which was promoted by the Land off Ashlawn Road development for Dunchurch crossroads, represented the best possible scheme that could be delivered within the existing highway boundary. Consequently, the South West Link Road was recognised as critical infrastructure, including by the Inspector. The SWLR is now being promoted by Homes England, is subject to a live planning application and is likely to be consented very soon. This will significantly relieve the transport issues at Dunchurch Crossroads, and it will then be possible for Lodge Farm to come forward without exacerbating the impacts previously identified at the junction) i.e. safety and air quality.
- 7.17 As such, the position remains largely unchanged from that which was considered during the previous Local Plan. The highway schemes identified at that stage are likely to come forward in advance of the Lodge Farm development proposals. This means additional opportunities now exist for Lodge Farm to provide measures to promote sustainable and active modes of transport.
- 7.18 More generally, a change in national and Local Policy to promote Net Zero means that, for any future Plan, the decision-making process would first focus on measures which support decarbonisation with any residual highway schemes being considered only after all other options have been exhausted. Lodge Farm has an opportunity to positively contribute to this through an updated transport strategy.
- 7.19 Additionally, whilst it is still not yet consented, far more certainty can be afforded to the delivery of the Rugby Parkway Rail Station proposals which are now actively being promoted by Warwickshire County Council. This new rail service will provide opportunities to access London and Birmingham which are attractive and sustainable.

#### Summary of traffic modelling

- 7.20 The original assessment work, completed using WCCs traffic model and presented within the 2017 STA, was accepted by the Inspector as robust. The Inspector concluded that the evidence within the STA demonstrated that highway impacts arising from the Local Plan allocations (as well as Lodge Farm specifically) could likely be mitigated.
- 7.21 That evidence adopted several robust assumptions which, if revisited in the context of current travel patterns and policies, would likely result in a less pessimistic view of how the network will function in the future. These include:



- Traffic flows used within the forecasting are based on a 2016 starting position. Traffic growth has not materialised to the level, which was projected in the 2017 exercise and, as such, the point at which network and junction capacity becomes problematic will now occur later than would have been identified within the original work
- Traffic generation estimates used to predict the traffic volumes that would be generated by new developments are based on proxy sites which were also surveyed before the pandemic and, as a result, may also be overly pessimistic, new surveys or methods of estimating future development specific trip generation may result in lower trip generation estimates than was adopted within the original traffic modelling. Revisiting the trip distribution patterns on a similar basis, making it more 'locally relevant', may also reduce the dispersed nature of currently predicted trip patterns as well as reducing any inherent bias towards journeys of longer distances which can arise through the application of gravity modelling techniques.
- O Updates to TEMPro and NTEM growth projections, the introduction of the Common Analytical Scenarios (alongside the recognition that the core scenario represents a position where Government Policies on Net Zero have failed to deliver) and the fact that a number of developments where trip generation levels were estimated within the original modelling have now been built out, means that traffic volumes would likely be lower in new future year models than was the case in the original models (this also points to a situation where additional capacity may exist within the network to accommodate additional development).
- 7.22 The highway schemes identified within the original STA work were considered to be sufficient by the Inspector to mitigate any potential highway impacts. The majority of these schemes and, critically the SWLR, are well progressed and, as such, any risks that key infrastructure which is required to support the current plan will not be delivered are minimal.
- 7.23 It is likely that future assessments, completed in line with the previous STA work, but allowing for changes in both current assumptions and policies to achieve Net Zero, would demonstrate that a larger development (Appendix A) is possible within Lodge Farm without inducing a significant impact on highway safety or air quality.

## 8.0 Summary and Initial Recommendations

## **Summary**

- 8.1 This Transport Overview Note sets out the key policy, approach and design changes which provide substantial reasoning to overcome the key objections raised within the Inspectors report (2019) which contributed to this site being removed from the Local Plan.
- 8.2 This will help shape, focus and give significant weight to any new material submitted on behalf of this site to Rugby Borough Council as part of its Local Plan review process Issues and Opportunities.



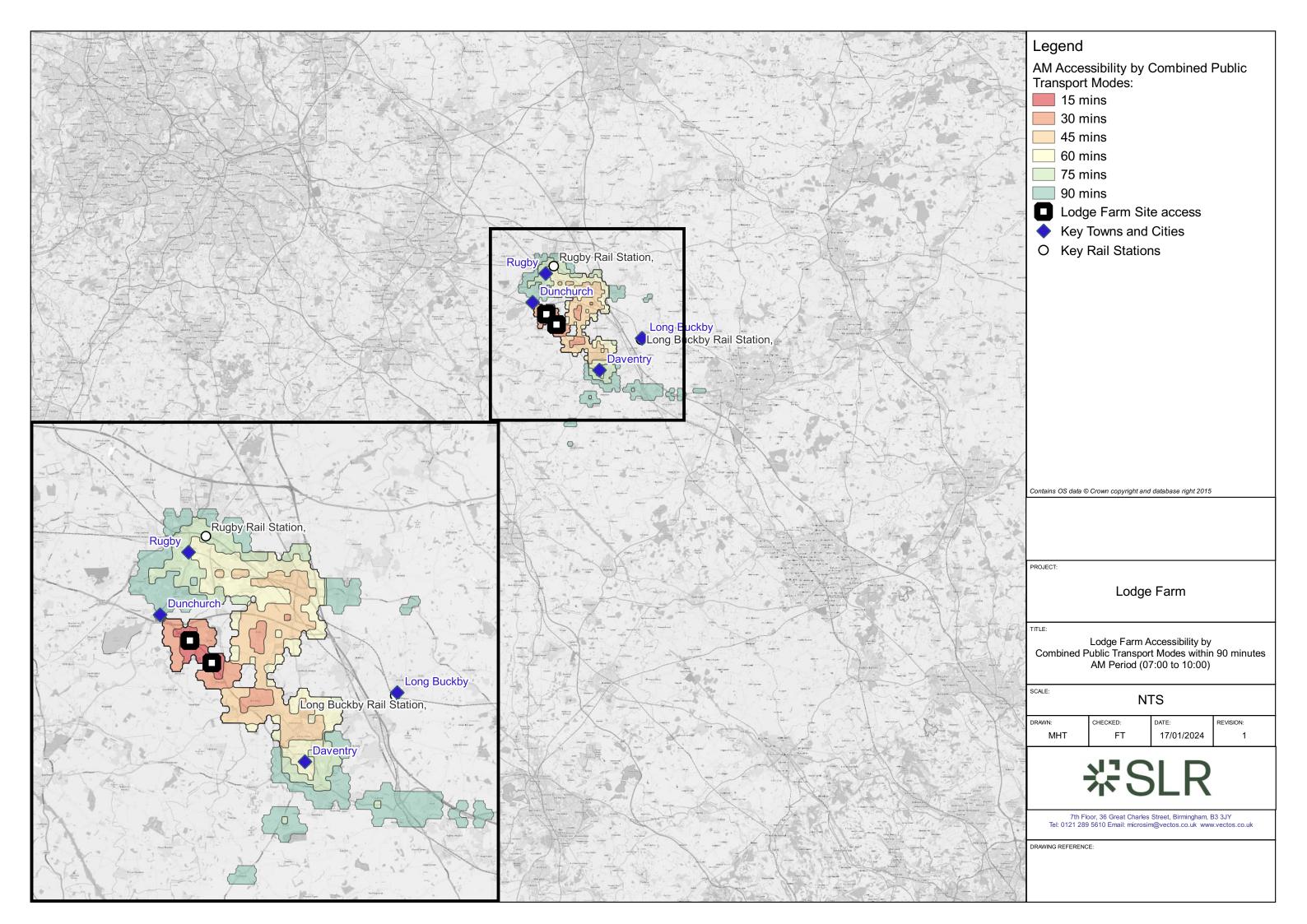
## **Initial Recommendations**

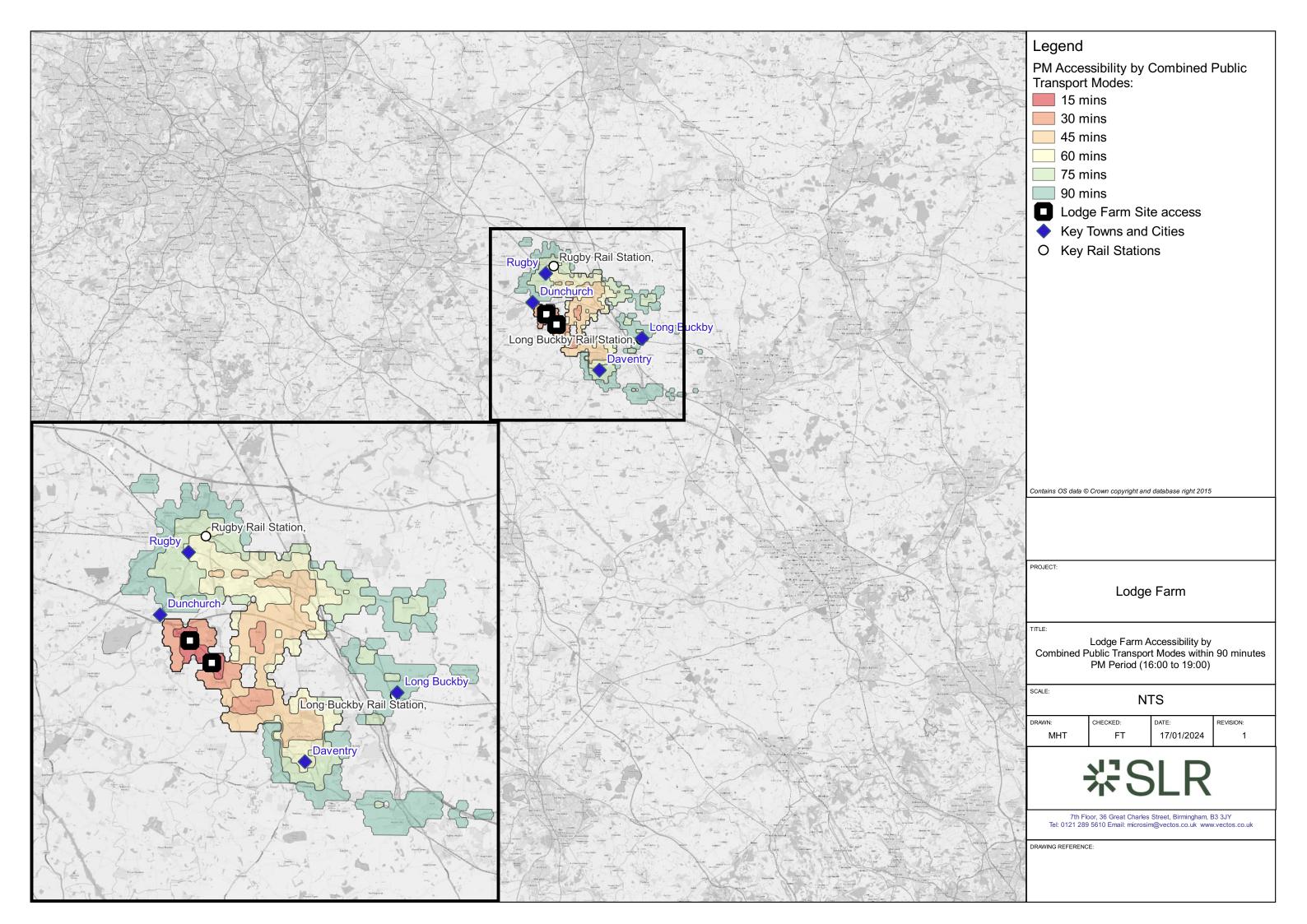
- 8.3 It is recommended that the Transport Strategy for this site is updated in line with the information set out in this Overview Note to provide further measures for increased mobility choice.
- 8.4 The greater critical mass proposed as part of the revised Masterplan and the mix of uses, including those for local people are essential in ensuring that the proposal meeting sustainability criteria and Placemaking objectives. A larger development will also ensure more Section 106 funding can be directed to the bus proposals and 'transport goodies' providing greater certainty that modal shift can be achieved and that investment in sustainable mobility can become self-sustaining.
- 8.5 More detailed and updated evidence around the bus provision should be provided including written support from Stagecoach and the analysis should also demonstrate the complementary benefits to other large strategic sites and existing, smaller, rural hamlets from the new bus service (s) proposed. Extending the bus services to both Rugby train station and the proposed Rugby Parkway station should be considered.
- 8.6 It will be important to show in detail how new Active Travel routes to the proposed Rugby Parkway Station can be created from the site and how the two parts of the site i.e., north and south of the A45, can be connected in a seamless manner to ensure a comprehensive and inclusive development. Given the status of the A45 as a Diversionary route, it would be beneficial to show how this section of carriageway within, and either side of the site can be delivered so that Placemaking and highway safety can co-exist on this key link.
- 8.7 The effect of additional development can also be reflected in updated traffic modelling accounting for the committed infrastructure associated with SW Rugby, the revised masterplan / internalisation (as above) and the change in DfT's attitude relating to a move away from Predict and Provide traffic forecasting and updated modelling scenarios with respect to achieving Net Zero.
- 8.8 It is recommended that any traffic modelling should only be completed once the Council has updated their 2016 traffic model to a new Base year which is anticipated to happen during the first half of 2024.

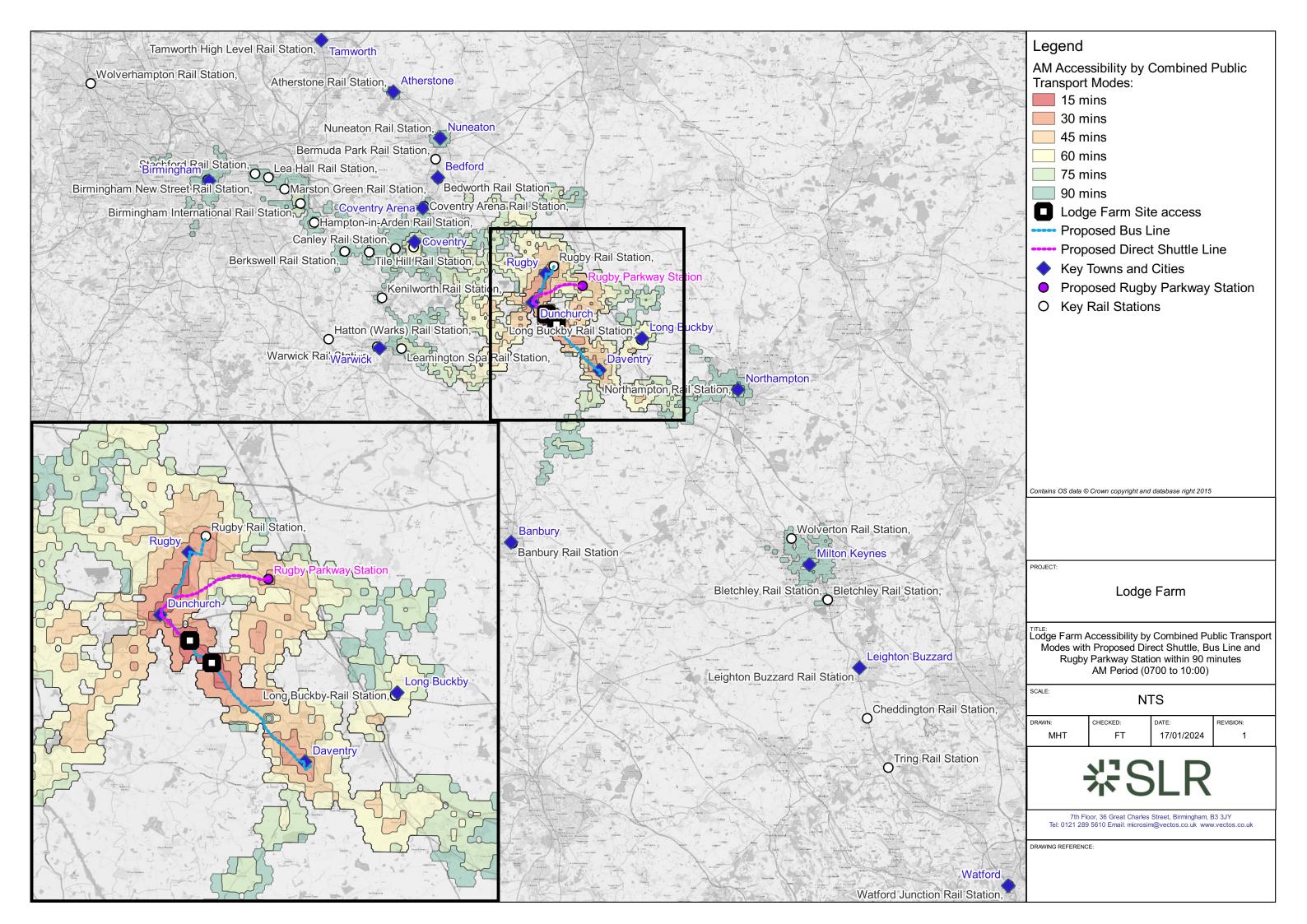


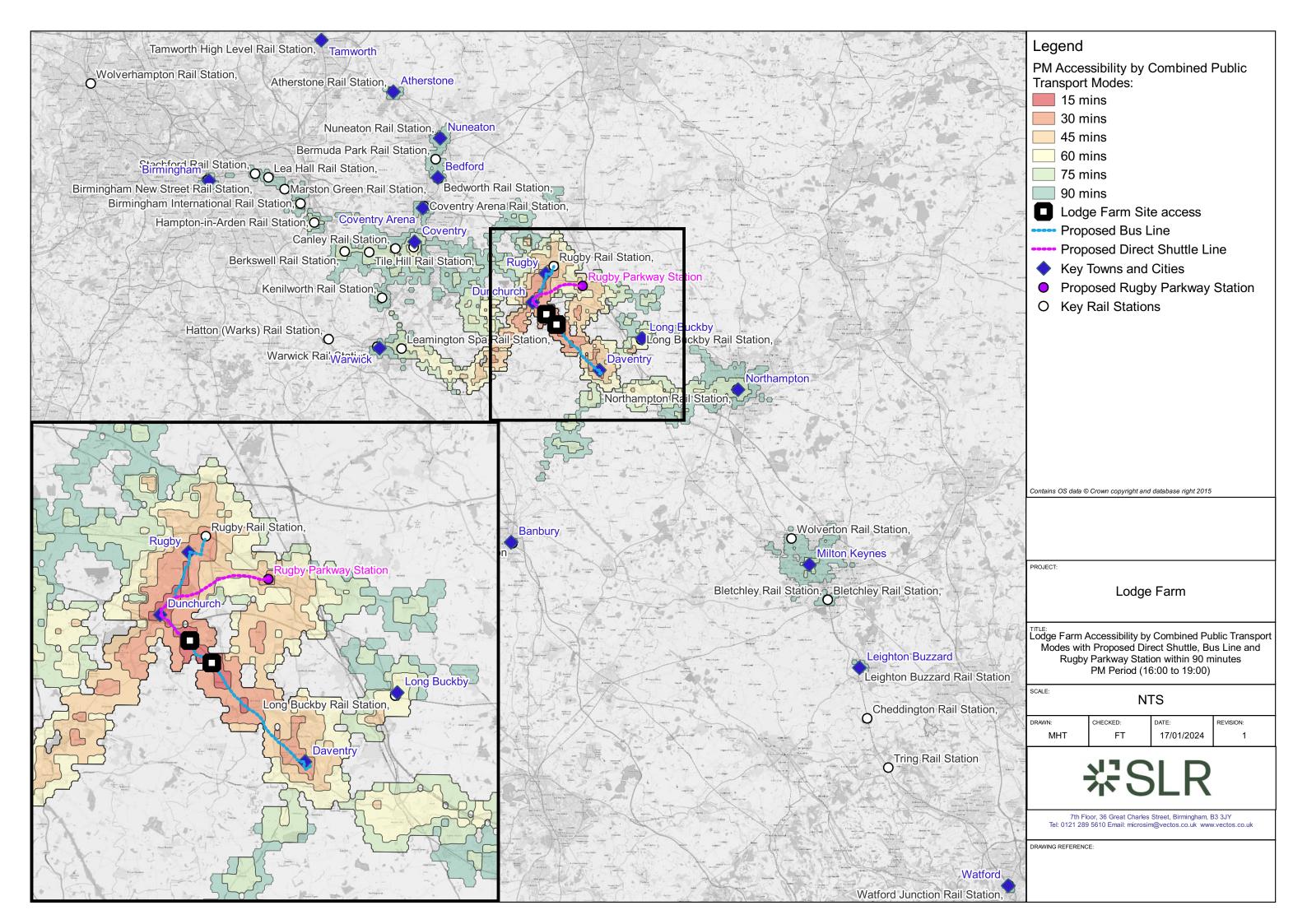
# **APPENDIX A – TRACC outputs**











# **APPENDIX B – Masterplan Proposals**









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Illustrative Masterplan

