



**National Highways Planning Response (NHPR 21-09)
Formal Recommendation to an Application for Planning Permission**

From: Alan Shepherd – Divisional Director
Network Delivery and Development
North West Region
National Highways
planningNW@highwaysengland.co.uk

To: Lancashire County Council FAO: Jonathan Haine

CC: transportplanning@dft.gov.uk
spatialplanning@nationalhighways.co.uk

Council's Reference: LCC/2022/0048

Location: LAND AT WOODCOCK ESTATE, STANIFIELD LANE, FARINGTON

Proposal: PROPOSED CRICKET FACILITY COMPRISING 2NO. CRICKET OVALS AND ASSOCIATED PAVILION BUILDING AND SPECTATOR SEATING, COVERED CRICKET NETS, ACCESS, PARKING, LANDSCAPING AND ASSOCIATED WORKS (INCLUDING TEMPORARY EVENT OVERLAY FACILITIES ON TICKETED MATCH DAYS), REALIGNMENT OF PUBLIC RIGHT OF WAY REF 9-12-FP 1, 7-4-FP 6 AND PUBLIC RIGHT OF WAY REF 9-12-FP 2, 7-4-FP5

National Highways Ref: 96192

Referring to the consultation on a planning application dated 22nd September 2022 referenced above, in the vicinity of the M65 and M6 motorways that forms part of the Strategic Road Network, notice is hereby given that National Highways' formal recommendation is that we:

- a) offer no objection;
- ~~b) recommend that conditions should be attached to any planning permission that may be granted (see Annex A – National Highways recommended Planning Conditions);~~
- ~~c) recommend that planning permission not be granted for a specified period (see Annex A – further assessment required);~~
- ~~d) recommend that the application be refused (see Annex A – Reasons for recommending Refusal).~~

Highways Act Section 175B is-/ is not relevant to this application.¹

This represents National Highways' formal recommendation and is copied to the Department for Transport as per the terms of our Licence.

¹ Where relevant, further information will be provided within Annex A.

Should the Local Planning Authority not propose to determine the application in accordance with this recommendation they are required to consult the Secretary of State for Transport, as set out in the [Town and Country Planning \(Development Affecting Trunk Roads\) Direction 2018](#), via transportplanning@dft.gov.uk and may not determine the application until the consultation process is complete.

| | |
|--|--|
| Signature: <i>Warren Hilton</i> | Date: 30 th January 2023 |
| Name: Warren Hilton | Position: Assistant Spatial Planner |
| National Highways: 9th Floor, Piccadilly Gate, Store Street, Manchester M1 2WD | |

Annex A National Highway's assessment of the proposed development

National Highways has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). The SRN is a critical national asset and as such we work to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

There have been pre-application discussions with National Highways prior to this application being submitted.

National Highways comments on proposals

WSP Development Planning, hereafter referred to as WSP DP, have been appointed by Lancashire Cricket (LC), Lancashire County Council (LCC) and Eric Wright Construction (EWC) to prepare a Transport Assessment (TA) in support of a full planning application for Farington Cricket Facility in South Ribble, Lancashire.

Scoping & Application Review

National Highways (NH) were involved in pre-application scoping for the proposed development across two periods in July 2021 and November 2021. This followed the guidance set out in 'The Strategic Road Network – Planning for the Future' (National Highways, 2015) to hold pre-application discussions in the early stages of the development planning. A Scoping Note Review was provided in August 2021, with further comments raised to WSP DP in November 2021.

Following the submission of the planning application for the proposed development, we completed a review of the supporting Transport Assessment in October 2022. The review raised a number of key comments, which have been responded to by WSP DP within the 'Farington Cricket Facility TA – Response to NH Comments' document dated 9th December 2022. We have undertaken a review of this document to understand whether the comments have been addressed.

Comments on WSP DP Note dated 09/12/22

NH requested details on the existing operation of the M65 terminus roundabout and M6 J29/M65 J1 interchange, which evidenced the current conditions.

In their response comments, WSP DP reiterated their stance that these junctions were not included in their original scope, which was agreed with Lancashire County Council (LCC) Highways Development Control, and that they do not consider that there will be any material impact on the operation of the Highway network which National Highways are responsible for.

Notwithstanding these comments, the total forecast development traffic flows have been provided for the M65 terminus junction and the M65/M6 junction, which is replicated in

Table 1. Table 2 provides a comparison of the Saturday 2024 Do Minimum and Do Something flows to show the percentage impact of the development traffic.

Table 1 Total Forecast Development Traffic Flows – SRN Junctions

| | AM Peak (07:30-08:30) Typical Day | PM Peak (16:30-17:30) Typical Day | Sat Peak (13:00-14:00) Typical Day | Sat Peak (13:00-14:00) T20 Event Day |
|--------------|-----------------------------------|------------------------------------|-------------------------------------|---------------------------------------|
| M65 Terminus | 3 vehicles | 8 vehicles | 61 vehicles | 217 vehicles |
| M65/M6 | 2 on M5 mainline 1 at junction | 7 on M65 mainline 1 at junction | 53 on M65 mainline 9 at junction | 145 at M65 mainline 75 at junction |

Table 2 2024 Development Impact – SRN Junctions

| | Do Minimum (2024) | Do Something (2024) | | % Impact | |
|--------------|-------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| | | Sat Peak (non-event day) | Sat Peak (T20 Event Day) | Sat Peak (non-event day) | Sat Peak (T20 Event Day) |
| M65 Terminus | 4,054 | 4,115 | 4,271 | +1.5% | +5.4% |
| M65/M6 | 4,586 | 4,648 | 4,803 | +1.4% | +4.7% |

WSP DP conclude that the impact is within the typical day-to-day variation as per statement 3.16 of the IEMA guidelines for the Environmental Assessment of Road Traffic which states that “It should also be noted that the day-to-day variation of traffic on a road is frequently at least some + or – 10%”

Further information has been provided in the form of traffic flow diagrams, to show the 2016 surveyed flows and predicted impact of the development on the SRN. These diagrams are welcomed to understand the predicted level of demand using National Highways’ network. NH note that it is unclear what units are being presented in the flow diagrams, as the 2016 survey flows are presented in Passenger Car Units (PCUs), however no units have been provided for the remaining flow diagrams, and the tables referred to previously in this note reference vehicles.

Notwithstanding this, it is acknowledged that the predicted level of development traffic in the morning peak and evening peak in particular is low at both junctions, with the Saturday peak higher. The highest level of predicted demand is shown on a Saturday event day. It is noted that the values provided in Table 2 for the M65/M6 junction include the M65 mainline. The values for the traffic at the M6/M65 junction have been split into the traffic using the junction and traffic using the M65 mainline. Table 3 highlights that the main impact is predicted to be on the M65 mainline, with a lower impact at the junction itself.

Table 3 2024 Development Impact – M6/M65

| | Do Minimum (2024) | Do Something (2024) | | % Impact | |
|----------|-------------------|--------------------------|--------------------------|--------------------------|--------------------------|
| | Sat Peak | Sat Peak (non-event day) | Sat Peak (T20 Event Day) | Sat Peak (non-event day) | Sat Peak (T20 Event Day) |
| Junction | 2,486 | 2,494 | 2,558 | 0.3% | 2.9% |
| Mainline | 2,100 | 2,153 | 2,245 | 2.5% | 6.9% |

NH acknowledge that the predicted non-event day demands are relatively low, with a higher predicted impact on an event day. The information provided suggests that an Event Management Framework will be developed for each event on a match-by-match basis, which is seen as an appropriate approach. NH recommend that National Highways are consulted as the EMF develops.

Traffic Flow Data

NH requested that the traffic flow data was validated using WebTRIS or other publicly available traffic data to ensure the flows remain representative of normal traffic patterns, on the basis of the traffic surveys having been undertaken in 2016.

WSP DP have compared the baseline traffic flow data from 2016 to more recently available traffic counts from the Department for Transport (DfT) online traffic count database. Baseline traffic flows have been compared to counts at Stanifield Lane (DfT Count 17668) in September 2018 and A582 Lostock Lane (DfT Count 48595) in June 2021. The comparison table presented in the technical note is shown in Table 4.

Table 4 Comparison with DfT data

| | DfT Data | | 2016 Survey Data | | | | % Difference | | | |
|--|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|--|--|
| | AM Peak (07:30 - 08:30) | PM Peak (16:30 - 17:30) | AM Peak (07:30 - 08:30) | PM Peak (16:30 - 17:30) | AM Peak (07:30 - 08:30) | PM Peak (16:30 - 17:30) | AM Peak (07:30 - 08:30) | PM Peak (16:30 - 17:30) | | |
| Stanifield Lane DfT Count 17668 (September 2018) | 991 | 1,031 | 1,267 | 1,264 | +28% | +23% | | | | |
| A582 DfT Count 48595 (June 2021) | 3,341 | 3,806 | 4,216 | 4,263 | +26% | +12% | | | | |

The table shows that the DfT data is lower than the baseline survey data in all instances. Further data has also been provided by LCC Highways for Stanifield lane, which provides weekday and weekend data between the 12th and 20th November 2022. This data has also been reviewed against the 2016 traffic flows, with the comparison shown in Table 5.

Table 5 Comparison of baseline survey data and LCC Highways data

| | 2016 Data (Total Vehicles) | | | 2022 Data (Total Vehicles) | | | % Difference | | |
|----------------------------|----------------------------|---------|----------|----------------------------|---------|----------|--------------|---------|----------|
| | AM Peak | PM Peak | Sat Peak | AM Peak | PM Peak | Sat Peak | AM Peak | PM Peak | Sat Peak |
| Stanifield Lane Northbound | 668 | 564 | 544 | 419 | 428 | 518 | +60% | +34% | +5% |
| Stanifield Lane Southbound | 600 | 700 | 552 | 391 | 428 | 312 | +53% | +63% | +77% |

As with the DfT data, all of the 2016 traffic flows were higher than the supplied 2022 data. As such, WSP DP have concluded that ‘the assessments included within the TA represent a worst-case scenario’.

The comparisons have been undertaken for sites on the Local Road Network and do highlight that the 2016 flows are higher than the 2022 data. It is noted that comparisons have not been undertaken on the Strategic Road Network.

NH have therefore undertaken a further comparison of the traffic flows presented in the traffic flow diagrams against 2022 WebTRIS data, which is summarised in Table 6 for the Saturday peak. As mentioned, it is unclear whether the forecast flow diagrams are in vehicles or PCU, however as the 2016 survey is in PCU it has been assumed that all diagrams used PCUs. The WebTRIS calculation assumes vehicles less than 660cm are light vehicles (PCU factor of 1) whilst vehicles greater than 660cm are heavy vehicles (PCU factor of 2), allowing for a conversion of the WebTRIS flows into PCU. WebTRIS has been extracted for the 12th and 19th November 2022 to match the analysis undertaken on the Local Road Network. The analysis has been completed for the Saturday peak as the evening peak diagrams have not been presented.

Table 6 WebTRIS Comparison (PCU)

| Location | 2016 Base | 2024 DM | 2029 DM | 2022 WebTRIS |
|---|-----------|---------|---------|--------------|
| M65 Westbound off-slip (M65/4017L) | 498 | 521 | 531 | 693 |
| M6 Northbound off-slip (M6/7435J) | 476 | 928 | 945 | 914 |
| M65 Westbound Through M6 J29 (M65/4014B) | 742 | 1125 | 1150 | 948 |
| M65 Eastbound Through M6 J29 (M65/4011A) | 631 | 975 | 996 | 844 |
| M6 Southbound on slip (M6/7430B-M6/7438B) | 757 | 918 | 936 | 996 |
| M65 east of M6 J29 (M65/4020A) | 1201 | 1571 | 1603 | 1532 |

For the most part, the 2022 WebTRIS flows highlight flows which are higher than the 2016 flows but lower than the 2024 and 2029 demands, which appears reasonable. The exception to this is the M65 westbound off-slip and the southbound on-slip where the WebTRIS flows are the

highest. It is recommended that for future uses of the modelling that a validation process is undertaken for all possible locations on the SRN to ensure that flows are representative.

Committed/Expected developments

In the review of the TA, it was requested that confirmation should be provided that the approach to committed/expected developments had been agreed with the appropriate authorities. WSP DP have responded that the committed and expected developments were confirmed with LCC during pre-application scoping.

NH accept this confirmation that committed developments have been appropriately agreed with LCC.

Traffic Growth Factors

NH requested that further explanation was provided on how committed developments had been considered when adjusting the traffic growth factors, which had been extracted from TEMPro. To provide clarity, NH requested details on:

- Which developments have been used to remove jobs/homes from the TEMPro growth rates;
- Total number of jobs/growth removed – and the totals before and after in TEMPro;
- Which MSOAs has this been applied to; and
- Any other adjustments made.

WSP DP state that the TEMPro growth rates were adjusted to avoid double counting, whilst considering the assumed build out rate for the developments. Growth in households and jobs in South Ribble 012 were removed from the South Ribble totals, as this was accounted for within the growth associated with the Cuerden Strategic Site. No further adjustments were made to jobs growth.

The South Ribble household growth was reduced by 1,150 to account for the committed developments which were assumed to be built between 2016 and 2024 within South Ribble Local Authority. Furthermore, the assumed household growth was reduced by 2,581 in the 2029 scenario to account for the residential committed developments built between 2016 and 2019.

The methodology used by WSP DP to account for the household and jobs growth for the committed developments is considered to be reasonable for use in this assessment.

Assessment Year Scenarios

On review of the TA, NH commented that a 2029 Future Year assessment does not align with the guidance set out in National Highways' 'The Strategic Road Network Planning for the Future – a guide to working with Highways England on Planning Matters' (2015).

WSP DP have calculated the traffic growth factor for 2032, and noted that the difference between the 2029 assessment year and the 2032 growth factors are as follows:

- AM Peak Period: 2.1%
- PM Peak Period: 1.9%
- Saturday: 2.1%

In support of the minimal percentage differences, WSP DP state that the approximate increase of 2% is unlikely to result in any significant changes which would impact the conclusions from the assessments undertaken in the TA.

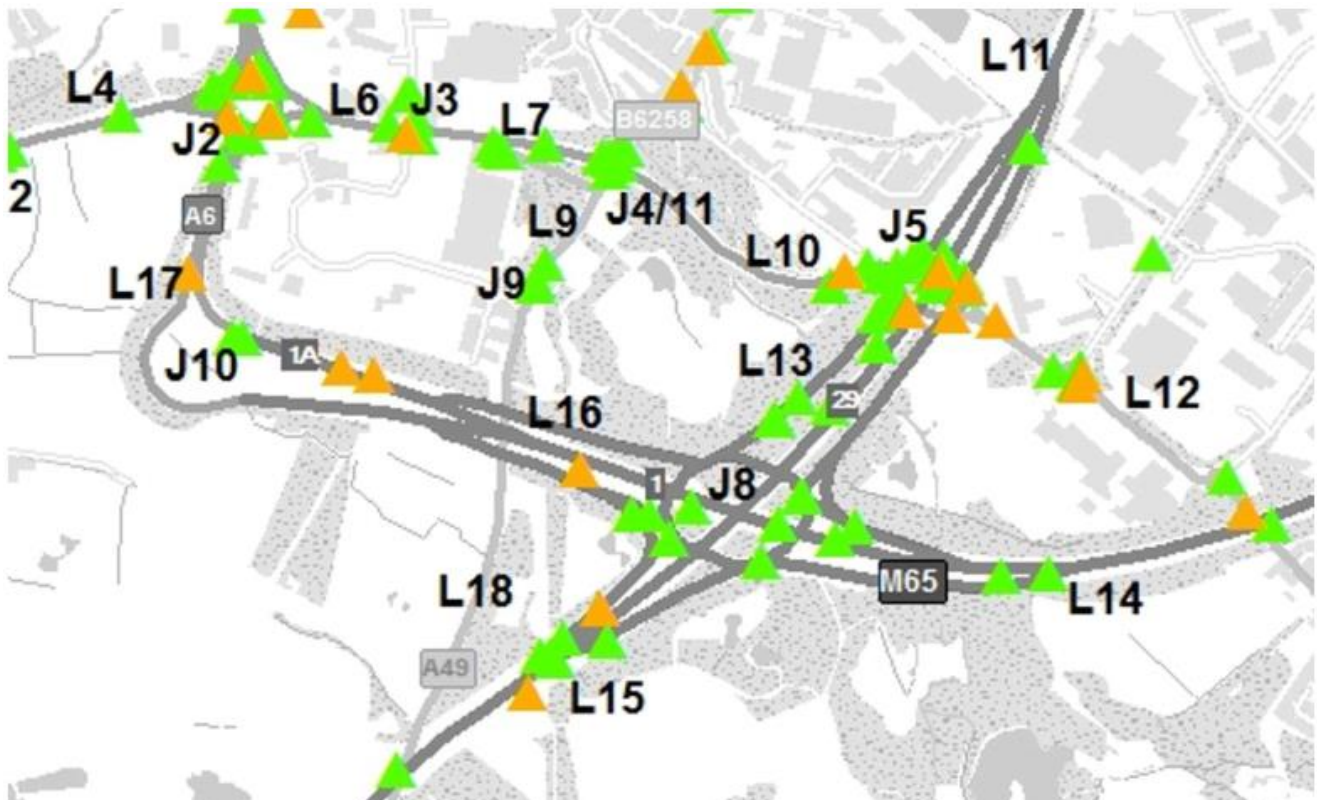
National Highways do not accept measures of materiality for junction assessments. However, it is acknowledged that the day-to-day impacts of the development on the SRN are predicted to be minimal despite the differences in assessment years.

Collision Data Analysis

NH requested confirmation as to the latest five-year period that was available for the collision data analysis. WSP DP state the latest five-year period was requested from LCC when preparing the TA, which was provided to cover 2016 to mid-2021.

The location and severity of the collisions for the SRN near the proposed development are shown in Figure 1, with green representing collisions of 'slight' severity and orange representing 'serious' severity collisions.

Figure 1 Collision Data Analysis



It is stated that there were two slight collisions and two serious collisions reported between the M65 terminus and the M65/M6 junction interchange.

Furthermore, it is stated that 13 collisions were reported in close proximity to the M65/M6 junction, of which 11 were slight and two were serious. The technical note states that '*a number of causes are reported for these collisions including rear end shunts, poor manoeuvres, driver distance and driving above the speed limit*'.

The latest PIC data was requested by WSP DP. Further analysis has been provided for the SRN junctions, as requested. Based on the analysis provided by WSP DP, there are no clear causations for the collisions which have occurred on the SRN.

Proposed Development - Parking

NH requested that confirmation was provided that the LHA were content with the level of parking which will be provided in relation to any relevant parking standards. After receiving comments from LCC Highways, WSP DP have stated that no objection has been raised on the levels of parking provided.

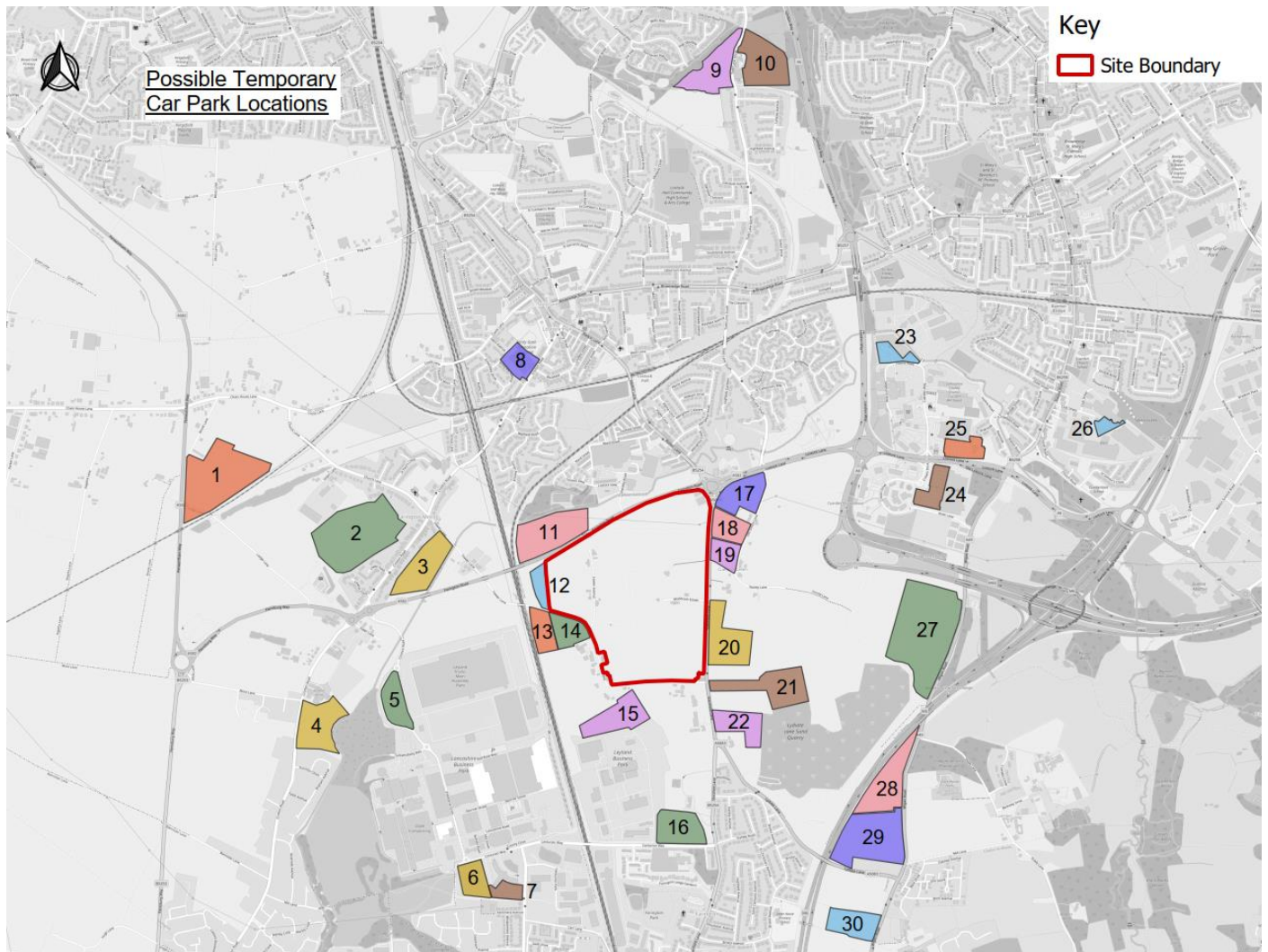
Furthermore, NH requested details as to how the car parks would be managed and operated at the proposed development, particularly on event days. WSP DP detail that the car park management strategy will be included in the Event Management Framework, which will be tailored to each event and will be produced by Lancashire Cricket in cooperation with the relevant authorities and groups.

It is stated in the technical note that the car parks will be managed by on-site stewards and staff on event days. Additionally, there will be other options for the management of the car park, such as pre-booked spaces, as well as off-site parking and other sustainable travel methods which will be advertised in advance of events at the proposed development.

NH requested that further detail be provided on the potential locations where buses and coaches may park on event days. Alongside LCC and LC, WSP DP have identified approximately 30 prospective parking locations. It is stated that these '*may be suitable for park and ride and coach parking*'. When additional parking is required which is surplus to that available at the proposed development site, the location of off-site parking will be assessed on an event-by-event basis and chosen following discussions with the respective landowners and in advance of preparing the Event Management Framework.

The potential locations for off-site parking are shown spatially in Figure 2.

Figure 2 - Possible Temporary Car Park Locations



It is noted that the levels of parking have not been raised as a concern by LCC Highways. It is important that the applicants are first able to demonstrate that they have actual control of the number of parking facilities illustrated in Figure 2 to underpin the eventual Event Management Framework. We therefore recommend that parking site availability is first agreed with LCC Highways before drafting of the Event Management Framework.

It is noted that some of the proposed parking locations are closer to the SRN junctions than the proposed development site. The EMP states that LC stewards will also be in operation at the off-site car parks, which is necessary for sites that are in close proximity to the SRN. It is recommended that National Highways are consulted as the Event Management Framework Plan develops and that the Event Management Framework Plan is kept under constant review by LC so that any lessons-learned can be promptly and effectively addressed.

Trip Generation

NH requested that the Event Management Framework Plan be provided for review to understand how the arrivals and departures to and from the site would be managed, which would enable further comment on the acceptability of the trip generation forecast. In response, WSP DP have provided the template Event Management Framework as an example as the content of this will differ for each event.

Furthermore, it is stated that LC have significant experience in planning and managing a range of events at Emirates Old Trafford and they will 'adopt the same meticulous approach to planning for and managing events at Farington'.

As/when event days are held at the proposed development, it is recommended that LC should liaise with National Highways to ensure that arriving and departing traffic is appropriately managed on to the Local Road Network and the SRN.

NH requested that further details be provided on why the given mode share has been assumed, as given the location of the site it is anticipated that the car will be the predominant mode of transport. WSP DP state that the mode share presented takes into account the level of parking provision as well as accessibility to sustainable travel modes. The Event Management Framework Plan for each event will include measures to encourage sustainable and active modes, as well as car sharing. At this time, the data is a projection, however, should the development become operational, mode split information and data can be collated to provide more up-to-date data.

NH welcome the approach of encouraging sustainable modes of transport in accessing the site, and it is recommended that National Highways are consulted regarding the Event Management Framework Plan.

Trip Distribution

In the TA, the home postcodes of LC players and members have been used to inform the routing assumptions for the trip distribution to/from the proposed development. It was stated that the LC member postcodes would establish the likely direction that spectators are likely to travel to and from. NH subsequently requested details for the percentage of spectators that attend existing LC matches in terms of members and non-members.

In response, WSP DP have reiterated that the member postcode data was the most suitable source to derive the home locations of spectators. Additionally, it is anticipated that the facility would encourage spectators who are local to the facility, who may not have previously attended at other locations in the past.

NH accept that using member postcode data is the most suitable source to derive the likely origin locations for spectators, notwithstanding the likelihood of higher proportions of spectators from areas closer to the proposed development.

NH also requested that the network diagrams be extended to include the M6 J29/M65 J1 interchange and the M65 Terminus Roundabout. This has been undertaken by WSP DP, with the expanded traffic flow diagrams provided. The expected traffic flows through both of the SRN junctions are detailed below in Figure 3.

Figure 3 – Development Traffic flows through SRN junctions

| | M65 Terminus roundabout (Two-Way) | M6 J29/M65 J1 Interchange (Two-Way) |
|--|-----------------------------------|-------------------------------------|
| Weekday AM Peak hour (07:30-08:30) | 3 | 3 |
| Weekday PM Peak hour (16:30-17:30) | 8 | 8 |
| Saturday Peak hour (13:00-14:00) | 62 | 62 |
| Saturday Peak hour – T20 Event Day (13:00-14:00) | 217 | 217 |

Further data, such as traffic flows, has been provided for the M65 terminus roundabout and M6 J29/M65 J1. It is noted that the northern roundabout at the M6 Junction 29 (M6/A6 Church Road/Lostock Lane) has not been provided. However, based upon the provided diagrams, the maximum development flow potentially using this junction is calculated below:

- Typical Morning Peak: 0 PCU
- Typical Evening Peak: 2 PCU
- Typical Saturday Peak: 14 PCU
- Event Saturday: 26 PCU

Forecast network diagrams have been provided for the Saturday peak, but not the evening peak, as stated in the response. This does not allow for a direct comparison to be undertaken to the modelling. However, it is acknowledged that the weekday morning and evening peak development show minimal predicted demand.

As the traffic flows for a T20 event day are of a significantly higher volume, they are required to be managed via Event Planning. It is recommended that LC liaise with National Highways as early as feasibly possible regarding the Event Management Framework Plan.

Junction Capacity Assessment - Vissim Modelling

NH requested the Vissim models and supporting files, which have been provided to us.

Vissim modelling has been undertaken in support of the Transport Assessment, with a technical note provided summarising this modelling. The model files have been provided to National Highways in support of the review. The following scenarios have been modelled within Vissim:

- 2024 Do Minimum
- 2024 Do Something
- 2029 Do Minimum
- 2029 Do Something

The Do Minimum scenarios do not include the proposed development, whilst the Do Something scenarios do include the proposed development.

The provided technical note states that the following updates have been made to the model:

- The existing Vissim models include 2024 background traffic and some committed developments. Background 2024 traffic has been uplifted to 2029 using TEMPRO growth rates and the committed developments have been updated to match those outlined in the TA.
- In the Do Minimum existing committed development trips were removed from the model, and revised committed development trips (including consented Cuerden trips) were added into the model.
- In the Do Something, the Farington Cricket access has been introduced and development trips from the Farington cricket access were added into the model.

The model has been developed for a weekday evening peak and a Saturday peak in support of the proposed development. It is noted that the evening peak Do Something appears to include demand for a 'typical development' day, whilst the Saturday peak Do Something appears to include demand for an event day.

As stated previously, it is recommended that for future use of the model a validation check is undertaken on the SRN to ensure that the flows being assigned within the modelling are representative.

Through the provision of the additional information, it can be seen that the day-to-day traffic associated with the development is predicted to be minimal on the SRN, and therefore a proportionate level of review of the model has been undertaken at this time. This high-level review of the model has noted the following:

- **The Farington access drawing includes a right turn pocket into the development site, however this has just been modelled as a single lane. It is noted that this is not likely to have an impact on the model operation at the SRN.**
- **Upon a review of the demands, there appear to be discrepancies between the 2024 Do Minimum and Do Something static routing in the Saturday peak, for locations where it would not be expected to be different. The 2024 Do Something (for example) includes u-turning at the A6/A582 roundabout which does not exist in the Do Minimum model.**

As a result of the additional information highlighting the limited predicted impact in terms of traffic flows on the SRN, the model has not been reviewed in detail by us. However, based on the high-level model review and the presented changes in traffic demands, future uses of this model are likely to require thorough review and update to ensure that a suitable modelling tool can be used to appraise traffic impacts on the SRN. The agreement of LCC Highways should

also be sought to the operation to how the model may affect the operation of the local road network that may then in turn affect traffic conditions closer to the SRN (e.g. interruption of traffic flows on Stanifield Lane as a result of pedestrian crossing demand as visitors make their way to the site).

Modelling Results

NH requested that queue length information be included within the reporting, with WSP DP running the model scenarios to collect these results to be input into the response. Average queue lengths have been reported within the reported tables whilst maximum queues have been shown graphically for each 5-minute period within the peak hour. In addition to the queue results, network statistics and journey times have been provided.

It is welcomed that the additional queue level results have been provided, with average and maximum queue results provided at the M6/A6 roundabout and the M65/M6 roundabout in the form of tables and graphs respectively. It is acknowledged that the low level of demand predicted through the SRN junctions means it is likely that there will be a limited impact upon the operation of the SRN junctions. It is recommended that any future results presented from the model continue to include queue results at the SRN junctions.

Merge / Diverge Assessments

NH requested that Merge/Diverge assessments were undertaken to supplement the TA. WSP DP have stated that the proposed development is forecast to generate few vehicle trips on the SRN in the peak hours. Therefore, given the minimal increase in traffic flows, Merge/Diverge analysis is not required for the impact caused by the proposed development.

NH have reviewed the updated traffic flow diagrams that were submitted for review. Based upon the flow diagrams it is acknowledged that the impact of the development is not likely to have an impact upon the merge/diverge requirement. On an event day, where flows are predicted to be greater, it is recommended that National Highways are consulted regarding the Event Management Framework Plan to ensure that the impact to merge and diverge operation is reduced.

Framework Travel Plan

NH reviewed the FTP, which was provided alongside the TA, and suggested that consideration should be taken on how the FTP could incorporate measures to promote sustainable and active travel for both spectators and players. WSP DP have stated that 'this FTP is primarily focused on staff, but the principles can also be promoted to players, as well as to spectators' and that this would complement the measures outlined in the Event Management Framework Plan.

NH welcome the consideration on promoting sustainable and active travel modes to players and spectators, as well as staff at the proposed development. Parking provision for staff on site is of a level that may not in itself encourage sustainable modes by employees.

National Highways' conclusion and formal recommendation

Following the provision of the additional information, the predicted impact of the development on traffic on a day-to-day basis is predicted to be minimal and therefore unlikely to have a material impact upon SRN operation.

On an Event Day, it is predicted that there will be a higher volume of traffic using the SRN to access the proposed development site (or associated car parks), which is to be controlled by an Event Management Framework Plan. It is welcomed that a specific Plan will be developed for each Event, but it is essential that we are consulted upon these plans when events are held. It is also recommended that if signage is to be considered and used as part of the Event Management, National Highways should be consulted to ensure that the signage meets the needs of both the Local Highway Authority and National Highways.

It is critical however that the approach to the management of events (especially non-cricket-related events that may draw large numbers of visitors and from further afield) is dynamic and seeks to learn any lessons promptly and effectively. There is no precedent for larger events of this type and scale being held in this area, and so we would therefore request that the approach to events management is kept under constant review.

However, we wish to remind both LC and LCC that the M6 motorway forms a part of the main north / south route for the west of Britain and is therefore of critical national importance in ensuring that it is not unduly affected by large numbers of visitors arriving by car for non-cricket-related events. Therefore, should any unacceptable traffic impacts on the SRN persist (despite refinements to the Event Management Framework Plan), it may have to be considered that the events likely to generate the highest levels of attendance are concentrated at the existing Old Trafford venue, where both the opportunities for access by sustainable modes (and existing visitor behaviour to utilise public transport) are already well established.

Notwithstanding this, we have evaluated this development proposal on the basis of what it will be – a cricket facility, not a concert venue – and so on the basis of the evidence presented, we raise no objection in isolation to the proposed development.

National Highways

30th January 2023

Standing advice to the local planning authority

The Climate Change Committee's [2022 Report to Parliament](#) notes that for the UK to achieve net zero carbon status by 2050, action is needed to support a modal shift away from car travel. The NPPF supports this position, with paragraphs 73 and 105 prescribing that significant development should offer a genuine choice of transport modes, while paragraphs 104 and 110 advise that appropriate opportunities to promote walking, cycling and public transport should be taken up.

Moreover, the build clever and build efficiently criteria as set out in clause 6.1.4 of [PAS2080](#) promote **National Highways Planning Response (NHPR 21-09) September 2021**

the use of low carbon materials and products, innovative design solutions and construction methods to minimise resource consumption.

These considerations should be weighed alongside any relevant Local Plan policies to ensure that planning decisions are in line with the necessary transition to net zero carbon.