

Of the 43 points raised in the Vectos note, we wish to focus on four significant points:

Point 22 states - *"It is claimed that the proposed occupier data does not account for staff commuting trips by car. This is incorrect as all car movements are accounted for within the proposed traffic data. The proposed daily traffic profile provided at **Appendix A** of the submitted Framework OMP shows all car movements in and out of the site across the day. These car movements account for on-site cars and also van drivers that drive to the site."*

HCS Response – This is not a 'claim' by HCS, this is a 'statement of fact' which is still evidenced in the underlying data despite the creative change to the shift operating hours noted in Point 23. The evidence in the proposed occupier data shown in Appendix A from the submitted Framework OMP clearly does not support the claim made by Vectos that *"all car movements are accounted for within the proposed traffic data"* (See points 24 and 25, below)

Point 23 states – *"HCS questioned the typical shift patterns. The proposed occupier has confirmed that there are 3 8-hour shifts each day at the following times 07:00-15:00, 15:00-23:00 and 23:00-07:00."*

HCS Response – We quoted the 'typical shift patterns' detailed in the 'Framework OMP'. These are supported by the original 'Transport Statement' and the 'Supplementary Transport Assessment', all of which define the typical shifts as '08:00-16:00, 16:00-12:00¹ and 12:00-08:00'. It appears that Vectos have now conveniently changed these shift patterns in an attempt to undermine the facts found, not just by HCS but by other consultees and respondents.

Points 24 and 25 state – *"Therefore, the overnight staff shift begins at 23:00 and ends at 07:00. This would mean that the staff arrive in the hour 22:00-23:00 and then leave 07:00-08:00 i.e., before and after their shifts." "This is consistent with the approved traffic data for the proposed development where it can be seen that there are more car movements around the start and end of the shifts."*

HCS Response: - Even taking into account the 'new' shift patterns, it is still clear that the 'proposed occupier data' shows no evidence of traffic movements associated with **the evening shift departures**, movements which would occur in the hour from 23:00 – 00:00. Appendix A, quoted at point 22, shows just 5 vehicles leaving during this hour, 4 HGV and 1 car. The data in Appendix A therefore continues to support our statement that the *'the proposed occupier data does not account for staff commuting trips by car'*.

Despite the clearly evident flaws in use of the 'operator supplied traffic data', Vectos have used the following points in this note - 3, 6, 7, 9, 13, 14, 26, 38, 39 - to continue to state that HCC and HBC believe their derived data to be 'robust' and 'accurate' and, by implication, that points made by HCS lack merit. These are subjective statements which could clearly influence a decision at a future planning committee and we look to the Case Officer to verify the current accuracy of the statements made.

¹ The ambiguous use of '12:00' rather than '24:00' occurs in all three documents. The context makes clear this is midnight.