

# Sustainability Appraisal of Land at Nant-y-Ffynnon, Letterston, Pembrokeshire SA62 5SX

Pembrokeshire County Council LDP Proposed Site Submission

December 2024

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#### **Revision Control**

Revision	Date	Author	Checker	Reviewer	Approver	Changes
1	<b>1</b> 0. <b>12.24</b>	ST/AL	СВ	ST	АР	Version for client review
2	12.12.24	ST	MS	ST	AP	Revised version following comments

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#### 1 Introduction

#### 1.1 Overview

Arcadis Consulting (UK) Limited has been commissioned by Amity Planning Limited to undertake the Sustainability Appraisal (SA) of Four Sites for Residential Site Promotion. This document contains the SA undertaken for Nant Y Ffynnon, Letterston, Pembrokeshire, SA62 5SX, which extends to 2.7 hectares. This SA has been written so that its findings could be directly inputted into the Sustainability Appraisal of the Pembrokeshire County Council (PCC) Local Development Plan (LDP2), and its findings compared to the other sites assessed in the SA. This is not intended to be a standalone SA Report and is intended to be read alongside the SA Report accompanying the second Deposit LDP2 for consultation 2024.

# 1.2 Pembrokeshire County Council Local Development Plan Review (LDP2)

The second Deposit LDP2 identifies a need for 5,840 new homes between 2017 and 2033 (365 a year) including 2,000 affordable homes. Consultation on the plan runs between 21 October and 16 December 2024. The Plan proposes revised town and village boundaries (known as settlement boundaries) and a range of sites are allocated (identified) for different land uses, including 54 sites for housing.

#### 1.3 The Proposed Site

The Proposed Site is submitted to PCC as an alternative site, via an objection to the second Deposit LDP2. The Proposed Site comprises undeveloped land, and would provide a total of 62 units across Phases 1 & 2.

A Location Plan; Concept Site Plan; SWOT Analysis Plan; Ecology Report; Transport Statement, Agricultural Land Classification Survey, and Landscape Character & Visual Impact Assessment; and Constraints Plan will be submitted in support of the Proposed Site. These have been used as the basis of this SA.

## 1.4 Sustainability Appraisal Methodology

The second Deposit LDP2 'Sustainability Appraisal and Strategic Environmental Assessment Report – Re-Deposit Plan' is available on the PCC website (Part1.pdf) (SA Report).

The assessment of the Proposed Site for promotion is based on the existing SA undertaken on the second Deposit LDP2. The assessment has been undertaken using the adapted SA Framework that has been used to assess the other sites. Further detail of how the SA Framework has been developed is included within the SA/SEA reporting available online. Other key sources of information used in this appraisal include:

- Local policies of relevance (see Section 2)
- Baseline information, key issues and opportunities and future trends data (SA Report September 2024)
- Existing appraisals so that the assessment of the proposed site is proportionate and consistent with the approach taken - Appendix 6, assessment of allocations, SA Report September 2024
- Interactive Constraints Map, available: Deposit Pembrokeshire County Council
- Natural Resources Wales, Check your flood risk

#### 1.5 Assessment Criteria

The SA Report notes that, in addition to the SA Framework, 'more site-specific appraisal criteria' were used to assess the impact of the proposed development sites. This is included within the Candidate Site Methodology. The SA Framework and scoring criteria are presented below and have been used in the assessment of the Proposed Site. In relation to the Candidate Site Assessment Methodology, it is noted this was undertaken ahead of the SA process, and not as an integral part of the assessment. It has not been possible to fully replicate this process for the Proposed Site (for example, in terms of consulting internal PCC departments and key organisations). However, the relevant criteria have been mapped against the SA Objectives, and included within the assessment, as presented in section 2. Deliverability of the site is assessed in the Site Representation Statement that supports the submission package.

## 2 SA of the Proposed Site

As set out in the SA Report (Appendix 6), the assessment of the effects of the sites against the Sustainability Objectives includes the following considerations of whether the effect would be:

- Negative (adverse), neutral or positive (beneficial);
- Direct or indirect;
- Short, medium or long term;
- Isolated or cumulative; and/or
- Reversible or irreversible.

Appendix 6 also notes that any site allocations would need to include mitigation measures to minimise or obviate any predicted negative effects. These include key mitigation measures that are required by the following policies, which have been taken to consideration in this assessment. Any additional measures will be included within the assessment, as necessary.

Figure 2-1 LDP Development Management Policies of relevance

Key	Policy Reference	
A.	GN1 (2)	<b>Local Amenity:</b> It would not result in a significant detrimental impact on local amenity in terms of visual impact, loss of light or privacy, odours, smoke, fumes, dust, air quality or an increase in noise or vibration levels.
В.	GN1(4)	Soil Quality: It would not cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) on soils
C.	GN(5)	<b>Biodiversity:</b> It respects and protects the natural environment with no unacceptable adverse effects (a harmful impact that cannot be satisfactorily mitigated) on the environment including protected sites, habitats and species;
D.	GN1(6)	Sustainable Transport: It will incorporate sustainable transport and accessibility principles and would not result in a detrimental impact on highway safety or in traffic exceeding the capacity of the highway network.
E.	GN1(9)	Water Quality: It would not have a significant adverse impact on water quality (see also policy GN 47);
F.	GN1(10)	<b>Light Pollution:</b> Any proposal with significant light pollution potential must include a lighting scheme. Proposals must minimise their light impact through appropriate mitigation wherever possible.
G.	GN1(11)	Waste and Pollution: It minimises the generation of waste during implementation and manages any waste generated.
н.	GN1(12)	Health and Safety: It would not cause or result in unacceptable harm to health and safety, including through flood risk
1.	GN2	Sustainable Design
J.	GN1(3)	Landscape: It would not cause an unacceptable adverse effect (a harmful impact that cannot be satisfactorily mitigated) on landscape character, quality or diversity including the special qualities of the Pembrokeshire Coast National Park and neighbouring authorities;
K.	GN28	<b>Historic Environment:</b> Development will only be supported where it conserves, protects, preserves or enhances the following cultural and historic assets and their setting
L.	GN1(8)	Flooding: It would not cause or result in unacceptable harm to health and safety, including through flood risk.
M.	SP19	Welsh language: Must not have an unacceptable impact on the vitality and viability of the Welsh language and development to be managed sensitively through mitigation and measures to enhance the interests of the Welsh language and culture.

In addition, emerging LDP Policy GN15 stipulates that all new build residential development on sites of 5 or more units must provide a minimum of 20% of properties built to Lifetime Homes Standards. Policy GN20 sets the requirements for Affordable Housing.

The full assessment of the Allocations can be found in Appendix 6 here: Appendices Appendix 1 SA of the LDP Vision (1).pdf

Table 2-1 Scoring Matrix

++	There is a generally consistent strong positive association between the policy option and the Sustainability Objective
+	There is a weak or inconsistent, but generally positive association between the policy option and the Sustainability Objective.
0	There is not a significant association between the policy option and the Sustainability Objectives, or the association is neutral (the combination +/- is used where it is believed a policy will have both positive and negative effects with regard to a particular Sustainability Objective).
-	There is a weak or inconsistent, but generally negative association between the policy option and the Sustainability Objectives.
	There is a generally consistent strong negative association between the policy option and the Sustainability Objectives.
?	The association between the policy option and the Sustainability Objectives is uncertain, may be used in association with other symbols to indicate a degree of uncertainty in the conclusion.

## 2.1 Assessment

Table 2-2 Sustainability Appraisal of Proposed Site

No.	SA Objective	Appraisal commentary	Effect Score	Mitigation	Proposed Project Commitments
1.	Develop and maintain a balanced population structure.	Provision of housing sites can have direct positive effects on the population structure, in the short, medium and long term. For instance, in the short-term younger people may be able to stay in the county if there is suitable housing at an affordable price. Over time, these communities may stay in the area and have families, leading to a cumulative positive effect.	+	n/a	n/a
2.	Promote and improve human health and well-being through a healthy lifestyle, access to healthcare and recreation opportunities and a clean and healthy environment.	The Proposed Site would comprise the development of high-quality housing and include an increase in trees and vegetation cover in comparison to the existing site. There is an allocated Amenity Open Space approximately 170m from the site and Recreational Open Space approximately 300m from the site. The proposed masterplan for the site shows an improvement in open space provision. This could lead to positive effects against this objective in terms of access to space for physical activity and social interaction. The closest GP surgery (Fishguard Health Centre)) is approximately 6 miles away via the A40, 11 minutes by car, 18 minutes by public transport (including a 5-minute walk) but is not within walking distance. This is places challenges for future occupants and could lead to negative effects on the local community, particularly those you are less able to walk or do not own a private car. Therefore, both positive and negative effects have been precited against this objective, leading to an overall neutral effect in accordance with the scoring matrix.	0	D	n/a
3.	Improve education opportunities to enhance the skills and knowledge base.	The closest schools to the site are Ysgol Ger Y Llan located 500 yards away and Wolfcastle CP school located 2.9 miles away (6 minute drive and 12 minutes via public transport).  The nearest secondary school is Ysgol Bro Gwaun located 6.3 miles away in Fishguard (11 minutes drive and 30 minutes by public transport). Haverfordwest	+	n/a	n/a

No.	SA Objective	Appraisal commentary	Effect Score	Mitigation	Proposed Project Commitments
		VC High school is 10 miles away, which is a 19 minute drive from the site, or 34 minutes by public transport.			
		The nearest special education units to the site are Ysgol Penrhyn Dewi - Dewi Campus, which is a 22 minute drive, Portfield School, which is a 21 minute drive.			
		The Proposed Site could support the enhancement of the community skills base in the medium to longer terms, through the provision of housing in relative proximity to educational facilities.			
4.	Minimise the need to travel and encourage sustainable modes of transport.	There are three bus stops within proximity to the site at Min-y-llan, St David's Road and the Recreation Ground Coach and Bus Station (7 minute walk), which would enable new residents to access services and facilities, as well as employment, via public transport. The site is 15 minutes via public transport to the coastal town of Fishguard. The availability of sustainable modes of transport could lead to beneficial effects against this objective.	+	n/a	
5.	Provide a range of high-quality housing including affordable housing to meet local needs.	The development of the Proposed Site would lead to the delivery of a range of high-quality housing, to meet local needs leading to a permanent beneficial effect. As a large site, the scheme creates the potential to generate a large proportion of affordable housing within the local area. 20% of properties built to Lifetime Homes Standards will also be supported.	++	GN15 and GN20	The scheme could commit to ensure that affordable housing remains affordable over time.
6.	Build safe, vibrant and cohesive communities which have improved access to key services and facilities.	It is considered that the development of the site would lead to an improvement for community cohesion and vibrancy over the undeveloped site. The Proposed Site is approximately 7 miles from Fishguard, which supports a wide range of services and facilities. Residents would also have access to more local facilities, such as the village store and memorial hall, within the village itself, 0.8 miles away from the Proposed Site.	+	n/a	The provision of additional services or facilities could improve the significance of this potential effect.
7.	Protect and enhance the role of	Ysgol Ger Y Llan is a Welsh medium primary school, located 470 yards from the site. The area around SA62 5SX has a larger than average concentration of Welsh speakers (at 33% of the resident population). In comparison to the	+	n/a	n/a

No.	SA Objective	Appraisal commentary	Effect Score	Mitigation	Proposed Project Commitments
	the Welsh language and culture.	provision of housing elsewhere, this could support the enhancement of the role of the Welsh language, through the provision of housing in relative proximity to Welsh medium educational facilities.			
8.	Provide a range of good quality employment opportunities accessible to all sections of the population.	The provision of high-quality housing in the local area could lead to an increase in the number of skilled workers living locally. Alongside an improvement in the attractiveness of the area through the redevelopment of an underused site, this could improve the viability and attractiveness of the area to potential inward investors, who may bring employment opportunities. Temporary and short-term employment opportunities may result from the construction of the site and the marketing and sale of the dwellings.	+	n/a	n/a
9.	Support a sustainable and diverse local economy.	There may be some long-term and indirect benefits to the local economy through the increase in the population locally as well as the provision of affordable housing, which could enable local people to continue to live locally.	+	n/a	n/a
10	Prepare for and reduce the impact of Pembrokeshire's contribution to climate change.	The proposed masterplan for the site shows the inclusion of ecology buffers and open space provision, including the provision of Sustainable Urban Drainage Systems (SuDS). Alongside the requirements for development provided by the LDP policies, it is considered that the development of the scheme could have a net beneficial effect.	+	B, C, D, E, G, I, L	n/a
11	Maintain and improve air quality.	Although the development of additional residential accommodation would be likely to lead to an increase in air pollution, it is considered that the combined effect of biodiversity enhancement measures and SuDS provision, and the potential use of sustainable transport modes to access nearby services and facilities, alongside policy requirements, would reduce the significance of this effect.	-	GN1(2)	n/a
12	Minimise the generation of waste and pollution.	The development of a residential site is likely to increase the amount of waste being generated locally, leading to a potential negative effect. However, the potential for this effect to be significant will be minimised through the masterplan design. The site location may minimise potential pollution, through the use of	-	A-G, I	The scheme could commit to using locally sourced materials to reduce pollution.

No.	SA Objective	Appraisal commentary	Effect Score	Mitigation	Proposed Project Commitments
		sustainable modes of transport, and other measures, such as sustainable design, as stipulated by LDP policy.			
13	Encourage the efficient production, use, re-use and recycling of resources.	The site is classified as Grade 3a moderate to high yields by the Agricultural Land Classification Survey. However, the site comprises a modest area of subgrade agricultural land that provides minimal economic farming benefits and does not, therefore, provide a sustainable use of resources. Notwithstanding this, its loss would lead to permanent and irreversible negative effects. However, this effect may be reduced in significance through measures to reduce the loss of soils.		In line with Spatial Strategy	The scheme could commit to re-using existing materials on site as much as is feasible.
14	Maintain and protect the quality of inland and coastal water. Candidate site methodology: Presence of species/watercours e	Running through the middle of the site is a Small Watercourse, which may be potentially negatively affected by the development. Mitigation would need to be put in place to protect against surface water run-off, reducing overall significance of the predicted effect.	-	E	SuDS should be incorporated as referenced in Policy GN 2 and PPW.
15	Reduce the impacts of flooding and sea level rises.  Candidate site methodology: spatial assessment: flood risk  Is the site itself at risk of flooding or causing pollution?	The site is at 'very low risk' of flooding from rivers and the sea and low risk from surface water and small watercourses. However, running through the middle of the site is a Flood Zone 2 Surface Water and Small Watercourse Zone. The proposed masterplan for the site includes potential enhancement in biodiversity provision and provision of open, including the provision of SuDS. Alongside the requirements for development provided by the LDP policies, mitigation measures such as Sustainable Drainage System could help to alleviate the risk of flooding, which could reduce the significance of the predicted negative effect.	-	L	SuDS should be incorporated as referenced in Policy GN 2 and PPW.

No.	SA Objective	Appraisal commentary	Effect Score	Mitigation	Proposed Project Commitments
16	Use land efficiently and minimise contamination.  Candidate site methodology:  spatial assessment: contaminated land.	The development of the site would comprise the use of greenfield land. This would lead to permanent and irreversible effects. However, this effect may be reduced in significance through measures to reduce pollution as a result of new development.	-	В	n/a
17	Safeguard soil quality and quantity.  Candidate site methodology: spatial assessment: mineral and soil safeguarding	The site is classified as Grade 3a agricultural land, which is considered "best and most versatile" quality. The loss of this land will reduce the availability of agricultural land in the area. This would lead to permanent and irreversible effects. However, this effect may be reduced in significance through measures to reduce the loss of soils.	-	В	The scheme could commit to re-using existing materials on site as much as is feasible.
18	Maintain, enhance and value biodiversity and promote the resilience of ecosystems.  Candidate site methodology: spatial assessment: sites protected for nature conservation importance.	The site is not within an area protected for nature conservation. The closest statutory ecological designation is a Special Area of Conservation (SAC) (Cleddau Rivers), located approximately 970 metres away.  The extended Phase 1 and Protected Species Survey found that there was no evidence of protected species on site, although there are records in the area of a number of mobile species which may on occasion utilise the site. It is considered unlikely that the development would significantly impact the biodiversity of the area, particularly if the recommendations of the report are implemented.  The proposed masterplan for the site shows some removal of existing trees (mainly at the proposed point of access to each land parcel). However, there is also retention of other existing trees and hedgerow, 2m ecology buffer zone and open space provision (bio-retention basin- 629.720m²). To mitigate against the loss there should be additional planting to compensate.	+	С	Any planting should utilise locally sourced, native species in all gardens and landscaping. Hedgerows could be used to demarcate property boundaries as these can act as natural wildlife corridors. Buffer zones have also been included

No.	SA Objective	Appraisal commentary	Effect Score	Mitigation	Proposed Project Commitments
	Does the current habitat provide valuable ecosystem service?	Alongside the requirements for development provided by the LDP policies, and national guidance, it is considered that the development of the scheme could have a net benefit for biodiversity, over the medium and long term.			around the existing hedgerows to protect them in the future.
	Is loss of protected woodland/trees/hed gerows proposed?				Retention of all existing field boundary hedgerows and associated
	Are there protected or locally important species or habitats				hedgerow trees wherever possible.
	present?				The infilling of gaps/thin spots within existing hedgerows to conserve and enhance existing landscape features.
					Allowing selected superior hedgerow plants to grow on as hedgerow trees.
19	Protect and enhance the landscape and geological heritage.  Candidate site methodology:	The site is not within proximity to any environmental designations. The proposed development will change the character of the site itself, but the development will be in-keeping with the established semi-rural/residential character within the site's immediate setting. This is confirmed by the Landscape Character Visual Impact Assessment that supports this representation. The introduction of a new, well screened, sensitively designed residential development would be neither out of character nor visually intrusive. Once landscape mitigation measures are	+	J	New native planting to improve the site's arboricultural character.

No.	SA Objective	Appraisal commentary	Effect Score	Mitigation	Proposed Project Commitments
	How does the site relate to the landscape, landform and other site features?	established, visual and landscape character impacts will be reduced. The site is considered to accommodate a new residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape in which it is located.			
20	Encourage quality locally distinct design that complements the built heritage.	The proposed masterplan for the site shows an improvement in vegetation cover above the existing site, including the enhancement of trees, and hedgerows.  The proposed development will change the character of the site itself, but the development will be in-keeping with the established semi-rural/residential character within the site's immediate setting. The introduction of a new, well screened, sensitively designed residential development would be neither out of character nor visually intrusive.	+	I	n/a
21	Protect, enhance and value the built heritage and historic environment.  Candidate site methodology: spatial assessment: sites, areas and buildings protected for heritage importance.	The site is not considered to be valuable for heritage importance. It is not located within a Conservation Area. It is located approximately 1.1km from a Scheduled Monument. The site is also located approximately 621m from a Grade II Listed Building (Saron Baptist Chapel). There is built development between the site and the Scheduled Monument and listed building, which minimises the effects on heritage assets, leading to an overall neutral effect.	0		n/a

#### 2.2 Cumulative Effects

PCC's SA Report does not include a summary of the potential cumulative effects of the allocated sites specifically. Therefore, at this stage, it is not possible to assess the cumulative effects of the proposed site, in addition to the proposed sites in the second Deposit LDP2. However, having considered if considering the cumulative effects of the policies and general policies in Table 6.34 of the SA Report, it is considered that the proposed site would contribute positively towards the housing sustainability objective, and reduce the overall predicted cumulative effect set out within the table that there would still be an under-provision of affordable housing with the second Deposit LDP2.

### 2.3 Summary of Findings

Overall, it is considered that the Proposed Site would lead to potentially significant benefits against SA Objective 5: providing a range of high-quality housing, including affordable housing, to meet local needs.

Positive effects have also been predicted for SA Objectives relating to: developing and maintaining a balanced population structure; improving educational opportunities; minimising the need to travel and encourage sustainable transport; building safe, vibrant and cohesive communities; protecting and enhance the Welsh language; providing employment opportunities; supporting the local economy; preparing for and reducing the impact of Pembrokeshire's contribution to climate change; maintaining, enhancing and valuing biodiversity and ecosystems; protecting and enhancing landscape and geological heritage; and encouraging quality locally distinct design.

Minor negative (not significant) effects were predicted against SA Objectives relating to: air quality; waste and pollution; use of resources; water quality; flood risk; land contamination; and soil quality.

Neutral effects were predicted against SA Objectives relating to: human health and wellbeing; and built heritage and the historic environment.



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# **Transport Statement**

Land at Nant y Ffynnon Letterston Pembrokeshire

December 2024

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Appendix 2 Site Context

Appendix 3 TRICS Trip Rate Data

#### **Revision History**

Α	11 <sup>th</sup> December 2024	First Issue

1827-ACS-ZZ-XX-RP-T-001-A Transport Statement.docx

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#### 1 Introduction

- 1.1 Acstro has been appointed by Wales and West Housing Association to prepare a Transport Statement to support the promotion of land at Nant y Ffynnon, Letterston as an alternative site for inclusion, as suitable for residential development, in Pembrokeshire County Council's Replacement Local Development Plan (LDP2).
- 1.2 The candidate site's location is shown in Appendix 1.

Appendix 1 Location Plan

- 1.3 The site is currently undeveloped. It is considered that the alternative site has the potential to deliver up to 63 dwellings.
- 1.4 This document considers the transport implications of the development of the candidate site. In particular, this Transport Statement demonstrates that the candidate site is in a sustainable location that is closely related to existing facilities and services and is accessible to pedestrians, cyclists and public transport users. It is also demonstrated that safe vehicular access to the site can be provided.
- 1.5 The structure of the Transport Statement is as follows:
  - Section 2 describes the relevant planning policy context that is relevant in terms of transport issues;
  - Section 3 describes the site's location, its proximity to services and facilities and its accessibility by all forms of transport.
  - Section 4 describes the proposed development and its access arrangements. An
    estimate of the likely trip generation of the proposed development of the land is
    also provided.
  - Section 5 provides a summary and conclusion.



#### 2 Policy Context

#### Future Wales - The National Plan 2040

- 2.1 This is the national development framework that sets out the direction for development in Wales to 2040.
- 2.2 Policies 11 and 12 relate to national and regional connectivity, respectively. These seek to encourage longer-distance trips to be made by public transport, while also making longer journeys possible by electric vehicles. In urban areas, to support sustainable growth and regeneration, the priorities are improving and integrating active travel and public transport. In rural areas the priorities are supporting the uptake of ultra-low emission vehicles and diversifying and sustaining local bus services. Active travel must be an essential and integral component of all new developments.
- 2.3 Planning authorities must act to reduce levels of car parking in urban areas, including supporting car-free developments in accessible locations and developments with car parking spaces that allow them to be converted to other uses over time. Where car parking is provided for new non-residential development, planning authorities should seek a minimum of 10% of car parking spaces to have electric vehicle charging points.

#### Planning Policy Wales (12th Edition)

- 2.4 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Government. The primary objective of PPW is to ensure that the planning system contributes towards the delivery of sustainable development and improves the social, economic, environmental and cultural well-being of Wales.
- 2.5 In terms of transport related policies paragraph 4.1.1 states that "the planning system should enable people to access jobs and services through shorter, more efficient and sustainable journeys, by walking, cycling and public transport".
- 2.6 Paragraph 4.1.10 states that "the planning system has a key role to play in reducing the need to travel and supporting sustainable transport, by facilitating developments which:
  - are sited in the right locations, where they can be easily accessed by sustainable modes of travel and without the need for a car;
  - are designed in a way which integrates them with existing land uses and neighbourhoods; and
  - make it possible for all short journeys within and beyond the development to be easily made by walking and cycling."
- 2.7 PPW advocates a sustainable transport hierarchy for planning, the hierarchy being, from top to bottom:
  - Walking and Cycling
  - Public Transport
  - Ultra Low Emission Vehicles
  - Other Private Motor Vehicles
- 2.8 It is Welsh Government policy to require the use of a sustainable transport hierarchy in relation to new development, which prioritises walking, cycling and public transport ahead of the private motor vehicles.
- 2.9 The transport hierarchy recognises that Ultra Low Emission Vehicles (ULEV) also have an important role to play in the decarbonisation of transport, particularly in rural areas with limited public transport services. To this end the provision of ULEV charging points is encouraged within new developments.



2.10 PPW recommends (4.1.51) that "a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. Parking provision should be informed by the local context, including public transport accessibility, urban design principles and the objective of reducing reliance on the private car and supporting a modal shift to walking, cycling and public transport. Planning authorities must support schemes which keep parking levels down, especially off-street parking, when well designed".

#### <u>Llwybr Newydd – The Wales Transport Strategy 2021</u>

- 2.11 This document sets out the Welsh Government's vision for how the country's transport system can help deliver on a pathway to creating a more prosperous, green and equal society. It lists its priorities as being:
  - 1. Bringing services to people in order to reduce the need to travel. To this end a target has been set that of 30% of the workforce works remotely on a regular basis.
  - 2. Allow people and goods to move easily from door to door by accessible, sustainable and efficient transport services and infrastructure.
  - 3. Encourage people to make the change to more sustainable transport.
- 2.12 Modal shift is at the heart of Llwybr Newydd. This means the proportion of trips made by sustainable modes increases and fewer trips are made by private cars.
- 2.13 The Welsh Government has set a target of 45% of journeys to be made by public transport, walking and cycling by 2040. This represents an increase of 13 percentage points on the estimated baseline (2021) mode share of 32%.

#### **TAN18 Transportation**

- 2.14 Planning Policy Wales Technical Advice Note 18 (TAN18) details the Welsh Government Government's policies in terms of transportation and repeats the general principles advocated in PPW i.e. that development is encouraged in sustainable, accessible, locations that will reduce the need to travel by car. Its aim is to promote an efficient and sustainable transport system and to counter the negative impacts associated with road traffic growth, for example increased air pollution, green house gases and congestion (2.1). It sees the integration of transport and land use planning as key (2.3) in achieving the Welsh Government Governments' sustainable development policy objectives by:
  - promoting travel efficient settlement patterns;
  - ensuring new development is located where there is good access by public transport, walking and cycling thereby minimizing the need for travel and fostering social inclusion;
  - managing parking provision;
  - ensuring that new development includes appropriate provision for pedestrians, cycling, public transport, and traffic management and parking/servicing;
  - encouraging the location of development near other related uses to encourage multi-purpose trips; and
  - ensuring that transport infrastructure necessary to serve new development allows existing transport networks to continue to perform their identified functions.

2.15 The needs of walkers and cyclists must be taken into consideration and the use of these most sustainable forms of transport encouraged in all developments (TAN18 Chapter 6). Similarly, all development should be accessible by public transport (Chapter 7).

#### The Active Travel (Wales) Act 2013

- 2.16 The Active Travel (Wales) Act 2013 is Welsh Government legislation aimed to support an increase in the level of walking and cycling in Wales; to encourage a shift in travel behaviour to active travel modes, and to facilitate the building of walking and cycling infrastructure.
- 2.17 The Active Travel (Wales) Act 2013 makes it a legal requirement for local authorities in Wales to map and plan for suitable routes for active travel, and to build and improve infrastructure for walking and cycling every year. It creates new duties to consider the needs of walkers and cyclists and make better provision for them. It also requires the consideration of walking and cycling as a mode of transport and the Act focuses on the promotion of walking and cycling for purposeful journeys, rather than as a purely recreational activity.
- 2.18 The Act is supported by the Active Travel Action Plan Wales (2014), and many of the actions of the Active Travel Action Plan Wales document also benefit recreational or competitive walking and cycling. 'Walking' in the Active Travel Action Plan for Wales includes the use of wheelchairs and mobility scooters and 'cycling' includes the use of electric bikes, but not motorcycles.

#### Pembrokeshire Local Development Plan (LDP) 2006 -2021

2.19 The alternative site lies outside of but adjacent to Letterston's current development boundary. Letterston is classified as a Service Centre in policy SP 12, which sets out the County's settlement hierarchy. It is one of four Service Centres in Pembrokeshire. Paragraph 5.78 of the LDP states that:

The Vision for Service Centres is that they consolidate and develop their roles as places where a good range and choice of services are provided, are accessible to their own population and a wider rural hinterland, and reduce the need for the rural population to travel to towns for retail, leisure and employment purposes. The four Service Centres have excellent public transport connections and are sustainable locations for development in rural Pembrokeshire.

#### 3 Location & Accessibility

#### Location

3.1 The site is shown in the context of nearby facilities and the surrounding transport network in Appendix 2.

#### Appendix 2 Site Context

- 3.2 The site is located to the north of Nant y Ffynnon. The south western corner of the site is contained by the Min-y-Llan residential development and to the north west and northern boundaries are with open countryside. The western boundary of the site runs along the rears of a number of St David's Road residential properties.
- 3.3 Letterston is located approximately 16km north of Haverfordwest and 9km south of Fishguard. Letterston is identified as a Service Centre in the current LDP in recognition of the good range of services and facilities that it provides to its residents and the surrounding rural hinterland.
- 3.4 Letterston has developed around the crossroads that is formed by the A40 trunk road, St. David's Road and Station Road. The candidate site is located to the north of St David's Road and approximately 1km to the east of the crossroads at Letterstone's centre.
- 3.5 A selection of Letterstone's services and facilities together with approximate walk distances from the site is provided in the table below.

Facility	Walk Distance / Time from Site		
St David's Road Bus Stops	500m / 7 minutes		
Playing Fields	550m / 8 minutes		
Ysgol Ger y Llan (Primary School)	750m / 10 minutes		
Saint Giles Church	600m / 9 minutes		
Letterston Village Stores	750m / 11 minutes		
Letterston Square: Bus Stops Restaurant / Take-Away Butchers / Post Office	1.2km / 17 minutes		
Letterston Memorial Hall / Playing Field / Tennis Courts	1.4km / 21 minutes		
Restaurant / Public House (Harp Inn)	1.7km / 25 minutes		

#### Table 1 Approximate Walk Distances from the Site to Local Facilities

- 3.6 The walk distances quoted above are measured from the proposed site entrance and assume a route along the public highway network.
- 3.7 A wider range of services and facilities can be accessed in Haverfordwest, which is linked to Letterston by good public transport services (described later).
- 3.8 In summary therefore, the site is in an appropriate location where there is a wide range of services and facilities nearby. This will minimise the distance travelled by residents of the site to access services and increase the possibility that sustainable modes of travel are used to make those trips.



#### **Active Travel**

- 3.9 The Chartered Institution of Highways and Transportation's (CIHT) 'Planning for Walking' (2015) states that "Across Britain about 80 per cent of journeys shorter than 1 mile (1.6km) are made wholly on foot something that has changed little in thirty years. In 2012 walkers accounted for 79 per cent of all journeys shorter than 1 mile, but beyond that distance cars are the dominant mode (DfT, annual)". It is considered that 2km, a distance that can be walked in around 25 to 30 minutes, represents a reasonable distance to expect that walking can be a viable option.
- 3.10 As described above there are a number of facilities located in Letterston and all that are listed in Table 1 are within a maximum of a 25 minute walk from the alternative site.
- 3.11 The site is accessible to pedestrians via the existing footways that run along the existing Nant y Ffynnon estate roads. These link to a footway on St David Road's northern side that links the alternative site to most of the village's amenities.
- 3.12 There is also a pedestrian link between Nant y Ffynnon and Min-y-Llan, the residential development to the east. For some residents of the proposed development this link provides a slightly shorter walk to the village's facilities compared to the walk along the entire length of Nant y Ffynnon to reach St David's Road.

#### **Public Transport**

- 3.13 The current LDP classifies Letterston as one of the County's four Service Centres that benefit from 'excellent public transport connections'.
- 3.14 The closest bus stops to the candidate site are located on St David's Road, approximately 500m to the east of the site. Currently there are no services that call regularly at these stops. Bus stops located at Letterston Square, a 17 minute walk from the site, provide access to the T5 Traws Cymru service.

Service	Route	Details
Т5	Aberystwyth – Cardigan - Haverfordwest	Generally hourly services Monday to Saturday. Three journeys on Sundays / Bank Holidays

#### Table 2 Local Bus Services

3.15 The bus service provides a link to Haverfordwest bus and railway stations, which provide connecting services to other destinations.

#### **Highway Network**

- 3.16 The site is located to the north of and will be accessed from the Nant y Ffynnon residential estate. This is a cul-de-sac development of approximately 35 dwellings. Nant y Ffynnon's streets provide a 5.5m wide carriageway with footways on both sides. Street lighting is also provided.
- 3.17 Nant y Ffynnon is accessed from St David's Road, which connects to Letterston Square and the A40 to the east. St David's Road has a 20mph speed limit.
- 3.18 St David's Road links to the A40 trunk road at Letterston Square. The A40 continues south to Haverfordwest and north to Fishguard.
- 3.19 A review of injury collision records (STATS19 records) for the latest 5-year period (2018 2022) has been undertaken and reveals that the local highway network operates satisfactorily.



- 3.20 There have been no injury collisions recorded on Nant y Ffynnon nor on St David's Road in the vicinity of the site during that period.
- 3.21 There is one slight severity collision recorded outside of the village, north of Feidr Joseph, and another near Letterston Square. There is also a serious severity collision recorded near the Spring Gardens junction.
- 3.22 All three recorded collisions are some distance from the alternative site. They are separate from one another and the absence of accident clusters indicate that these are isolated incidents rather than being reflective of any particular road safety issue that might be exacerbated by the development of the alternative site.



Figure 1 Injury Collision Records 2018 - 2022 (www.crashmap.co.uk)

#### 4 Proposed Development

4.1 It is considered that the candidate site is capable of delivering up to 63 dwellings.



**Figure 2 Indicative Site Layout** 

#### **Access**

- 4.2 The indicative layout below shows two areas, or phases, of development with 23 dwellings located in the western area and 40 in the eastern. Each area would have a separate vehicular access from Nant y Ffynnon with an internal pedestrian and cycle link between the two.
- 4.3 The extension of the existing Nany y Ffynnon streets, with 5.5m wide streets that have 2m wide footways on both sides and turning heads at their ends allows for the development to be served by adoptable standard estate roads.
- 4.4 The access arrangement would comply with current design standards and provide safe means of access to the site for walkers, cyclists and vehicle users.

#### **Trip Generation**

- 4.5 The potential trip generation of the proposed development of the site has been estimated by reference to the TRICS trip rate database, a database of over 7,100 traffic surveys of various types of development throughout the UK and Ireland.
- 4.6 From the TRICS database evidence of the trip rates of developments of privately owned houses (development of up to 100 units) in urban locations (but not town/city centres) in mainland Britain (excluding Greater London) have been analysed. Full details are provided as Appendix 3 and summarised below.

Appendix 3 TRICS Trip Rate Data

Time Range	Trip Rate per House			Trip Generation (63 Houses)			
	Arrivals	rrivals Departures		Arrivals	Departures	Total	
am peak Hour 08:00-09:00	0.161	0.25	0.411	10	16	26	
pm Peak Hour 17:00-18:00	0.266	0.23	0.496	17	14	31	

**Table 3 Vehicle Trip Rates & Proposed Development Trip Generation** 

4.7 The TRICS data suggests that the proposed development will generate around 26 to 31 peak hour vehicle movements. This volume of traffic is not considered to be significant and is unlikely to have a material impact on conditions experienced on the local highway network.

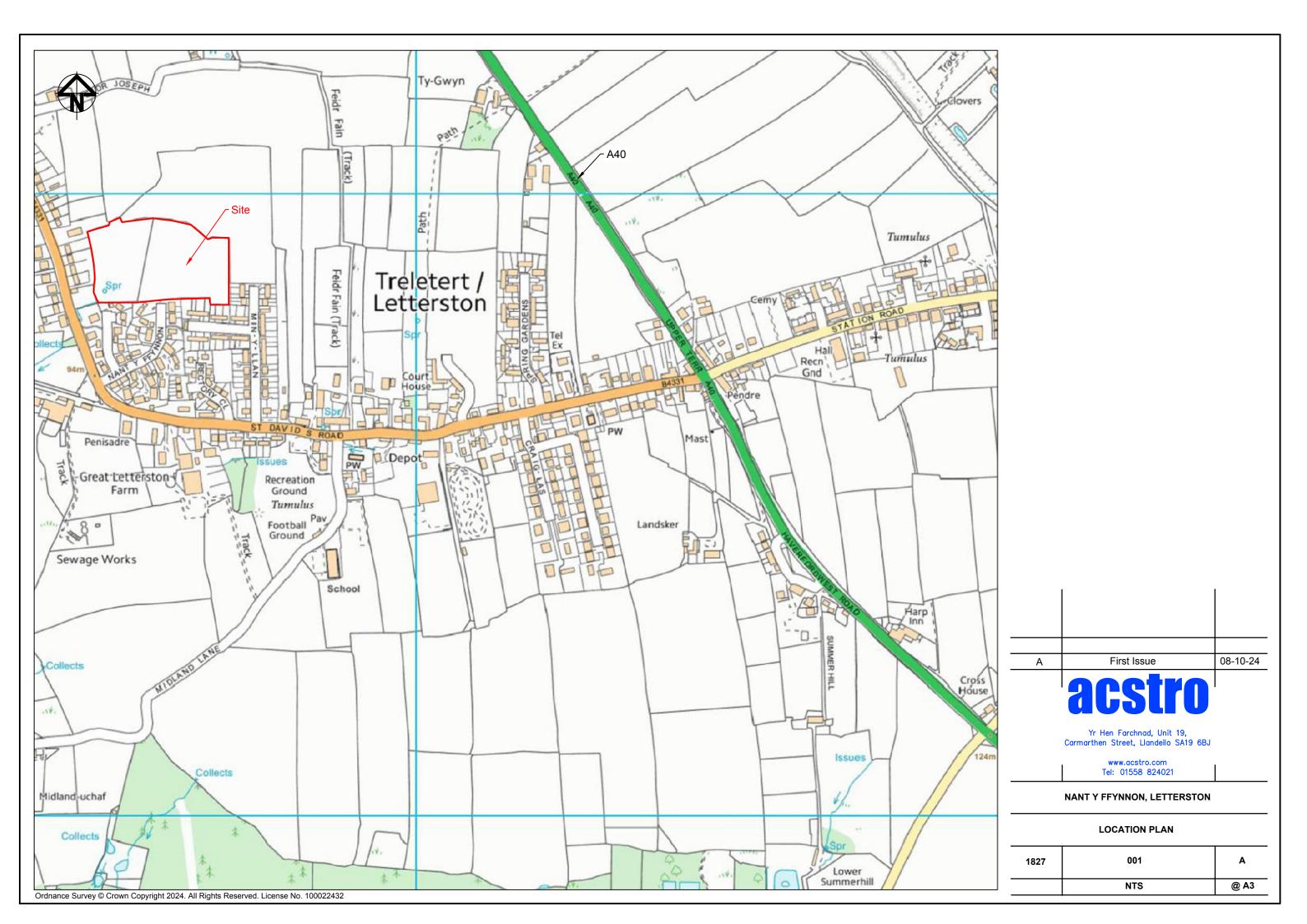


#### 5 Summary & Conclusion

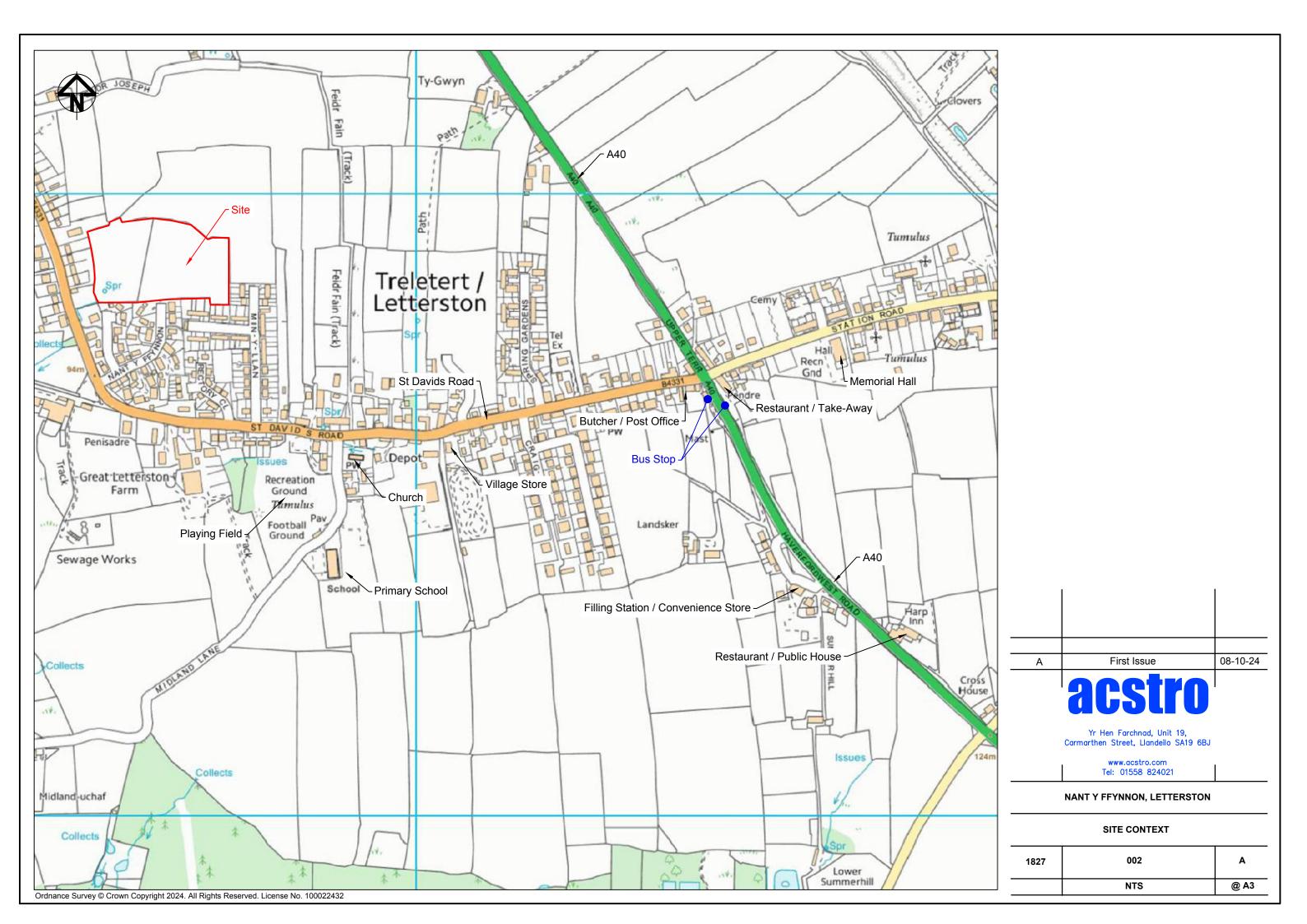
- 5.1 In summary this Transport Statement has demonstrated that:
  - The candidate site's location is closely related to Letterston's existing settlement and the facilities that it provides;
  - There are a good range of services and facilities near to the site offering education, shopping, employment, leisure and social opportunities. These can be accessed from the site by walking, cycling or by public transport.
  - The site is accessible to pedestrians and can be connected to the existing footway network.
  - A safe and suitable means of access can be provided through the extension of the existing Nanat y Ffynnon estate road cul-de-sacs.
- 5.2 As such it is considered that the alternative site meets planning policy requirements in terms of being in an appropriate location that is safely accessible by all forms of transport and that the impacts of the development on the continued operation and safety of the surrounding highway network would be acceptable or can be suitably mitigated.
- 5.3 It is concluded therefore that there are no transport related issues that should prevent the inclusion of this alternative site in Pembrokeshire County Council's LDP2.



# Appendix 1 Location Plan



# **Appendix 2 Site Context**



# Appendix 3 TRICS Trip Rate Data

Acstro Ltd Salem Llandeilo Licence No: 648801

Calculation Reference: AUDIT-648801-241211-1244

TRIP RATE CALCULATION SELECTION PARAMETERS:

Land Use : 03 - RESIDENTIAL

Category : B - AFFORDABLE/LOCAL AUTHORITY HOUSES

Category : B - AFF TOTAL VEHICLES

#### Selected regions and areas:

03	SOUTH WEST	
	WL WILTSHIRE	1 days
05	EAST MIDLANDS	
	LR LEICESTER	1 days
	NN NORTH NORTHAMPTONSHIRE	1 days
06	WEST MIDLANDS	
	WM WEST MIDLANDS	1 days
	WO WORCESTERSHIRE	1 days
07	YORKSHIRE & NORTH LINCOLNSHIRE	
	KS KIRKLEES	1 days
80	NORTH WEST	
	MS MERSEYSIDE	1 days
09	NORTH	
	FU WESTMORLAND & FURNESS	1 days
11	SCOTLAND	
	DU DUNDEE CITY	1 days

This section displays the number of survey days per TRICS® sub-region in the selected set

Page 2

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#### Primary Filtering selection:

This data displays the chosen trip rate parameter and its selected range. Only sites that fall within the parameter range are included in the trip rate calculation.

Parameter: No of Dwellings Actual Range: 10 to 68 (units: ) Range Selected by User: 10 to 100 (units: )

Parking Spaces Range: All Surveys Included

Parking Spaces per Dwelling Range: All Surveys Included

Bedrooms per Dwelling Range: All Surveys Included

Percentage of dwellings privately owned: All Surveys Included

#### Public Transport Provision:

Selection by: Include all surveys

Date Range: 01/01/16 to 06/09/23

This data displays the range of survey dates selected. Only surveys that were conducted within this date range are included in the trip rate calculation.

#### Selected survey days:

Monday 1 days Tuesday 1 days Wednesday 3 days Friday 4 days

This data displays the number of selected surveys by day of the week.

#### Selected survey types:

Manual count 9 days
Directional ATC Count 0 days

This data displays the number of manual classified surveys and the number of unclassified ATC surveys, the total adding up to the overall number of surveys in the selected set. Manual surveys are undertaken using staff, whilst ATC surveys are undertaking using machines.

#### Selected Locations:

Suburban Area (PPS6 Out of Centre) 6
Edge of Town 1
Neighbourhood Centre (PPS6 Local Centre) 2

This data displays the number of surveys per main location category within the selected set. The main location categories consist of Free Standing, Edge of Town, Suburban Area, Neighbourhood Centre, Edge of Town Centre, Town Centre and Not Known.

#### Selected Location Sub Categories:

Residential Zone 8
Village 1

This data displays the number of surveys per location sub-category within the selected set. The location sub-categories consist of Commercial Zone, Industrial Zone, Development Zone, Residential Zone, Retail Zone, Built-Up Zone, Village, Out of Town, High Street and No Sub Category.

#### Inclusion of Servicing Vehicles Counts:

Servicing vehicles Included X days - Selected Servicing vehicles Excluded 9 days - Selected

Secondary Filtering selection:

#### Use Class:

C3 9 days

This data displays the number of surveys per Use Class classification within the selected set. The Use Classes Order (England) 2020 has been used for this purpose, which can be found within the Library module of TRICS®.

#### Population within 500m Range:

All Surveys Included

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#### Secondary Filtering selection (Cont.):

#### Population within 1 mile:

 1,001 to 5,000
 1 days

 5,001 to 10,000
 2 days

 15,001 to 20,000
 1 days

 25,001 to 50,000
 4 days

 50,001 to 100,000
 1 days

This data displays the number of selected surveys within stated 1-mile radii of population.

#### Population within 5 miles:

5,000 or Less	1 days
25,001 to 50,000	1 days
50,001 to 75,000	1 days
125,001 to 250,000	3 days
250,001 to 500,000	2 days
500,001 or More	1 days

This data displays the number of selected surveys within stated 5-mile radii of population.

#### Car ownership within 5 miles:

0.6 to 1.0	4 days
1.1 to 1.5	5 days

This data displays the number of selected surveys within stated ranges of average cars owned per residential dwelling, within a radius of 5-miles of selected survey sites.

#### Travel Plan:

No 9 days

This data displays the number of surveys within the selected set that were undertaken at sites with Travel Plans in place, and the number of surveys that were undertaken at sites without Travel Plans.

#### PTAL Rating:

No PTAL Present 9 days

This data displays the number of selected surveys with PTAL Ratings.

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LIST OF SITES relevant to selection parameters

**DUNDEE CITY** DU-03-B-01 **TERRACED BUNGALOWS** 

307-441 BALUNIE DRIVE

**DUNDEE** 

DOUGLAS & ANGUS

Suburban Area (PPS6 Out of Centre)

Residential Zone

Total No of Dwellings:

68 Survey date: FRIDAY 21/04/17 Survey Type: MANUAL WESTMORLAND & FURNESS FU-03-B-01 SEMI DETACHED & TERRACED

PENNINE WAY **ALSTON** 

Neighbourhood Centre (PPS6 Local Centre)

Village

Total No of Dwellings: 66

> Survey date: FRIDAY 13/05/22 Survey Type: MANUAL

KS-03-B-02 **TERRACED HOUSES** KIRKLEES

SYKES CLOSE **BATLEY** 

Edge of Town Residential Zone

Total No of Dwellings:

19/10/18 Survey date: FRIDAY Survey Type: MANUAL

LR-03-B-01 SEMI-DETACHED & TERRACED LEICESTER

COLEMAN ROAD **LEICESTER** 

Suburban Area (PPS6 Out of Centre)

Residential Zone

Total No of Dwellings: 38

Survey Type: MANUAL Survey date: FRIDAY 22/10/21

MS-03-B-02 SEMI DETACHED/TERRACED **MERSEYSI DE** 

ST MARY'S GROVE

**BOOTLE** 

Suburban Area (PPS6 Out of Centre)

Residential Zone

Total No of Dwellings: 14

Survey date: WEDNESDAY 06/09/23 Survey Type: MANUAL

**SEMI-DETACHED HOUSES** NORTH NORTHAMPTONSHIRE NN-03-B-01

OCCUPATION ROAD

**CORBY** 

Suburban Area (PPS6 Out of Centre)

Residential Zone

Total No of Dwellings: 21

Survey date: WEDNESDAY 13/10/21 Survey Type: MANUAL

TERRACED HOUSES WI -03-B-01 WILTSHIRE

**BUTTERFIELD DRIVE** 

**AMESBURY** 

Suburban Area (PPS6 Out of Centre)

Residential Zone

Total No of Dwellings: 54

Survey date: TUESDAY 18/09/18 Survey Type: MANUAL

WM-03-B-02 SEMI-DETACHED WEST MIDLANDS

SHENLEY FIELDS ROAD

BIRMINGHAM SHENLEY GREEN

Suburban Area (PPS6 Out of Centre)

Residential Zone

Total No of Dwellings: 10

> Survey date: WEDNESDAY 07/06/23 Survey Type: MANUAL

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LIST OF SITES relevant to selection parameters (Cont.)

9 WO-03-B-02 TERRACED HOUSES WORCESTERSHIRE

GOODREST WALK WORCESTER MERRIMANS HILL Neighbourhood Centre (PPS6 Local Centre)

Residential Zone Total No of Dwellings: 16

Survey date: MONDAY 14/11/16 Survey Type: MANUAL

This section provides a list of all survey sites and days in the selected set. For each individual survey site, it displays a unique site reference code and site address, the selected trip rate calculation parameter and its value, the day of the week and date of each survey, and whether the survey was a manual classified count or an ATC count.

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TRIP RATE for Land Use 03 - RESIDENTIAL/B - AFFORDABLE/LOCAL AUTHORITY HOUSES

TOTAL VEHICLES

Calculation factor: 1 DWELLS

BOLD print indicates peak (busiest) period

	ARRIVALS		DEPARTURES			TOTALS			
	No.	Ave.	Trip	No.	Ave.	Trip	No.	Ave.	Trip
Time Range	Days	DWELLS	Rate	Days	DWELLS	Rate	Days	DWELLS	Rate
00:00 - 01:00									
01:00 - 02:00									
02:00 - 03:00									
03:00 - 04:00									
04:00 - 05:00									
05:00 - 06:00									
06:00 - 07:00									
07:00 - 08:00	9	34	0.072	9	34	0.201	9	34	0.273
08:00 - 09:00	9	34	0.161	9	34	0.250	9	34	0.411
09:00 - 10:00	9	34	0.168	9	34	0.243	9	34	0.411
10:00 - 11:00	9	34	0.125	9	34	0.181	9	34	0.306
11:00 - 12:00	9	34	0.132	9	34	0.112	9	34	0.244
12:00 - 13:00	9	34	0.135	9	34	0.135	9	34	0.270
13:00 - 14:00	9	34	0.155	9	34	0.138	9	34	0.293
14:00 - 15:00	9	34	0.168	9	34	0.181	9	34	0.349
15:00 - 16:00	9	34	0.273	9	34	0.164	9	34	0.437
16:00 - 17:00	9	34	0.273	9	34	0.148	9	34	0.421
17:00 - 18:00	9	34	0.266	9	34	0.230	9	34	0.496
18:00 - 19:00	9	34	0.224	9	34	0.178	9	34	0.402
19:00 - 20:00									
20:00 - 21:00									
21:00 - 22:00									
22:00 - 23:00									
23:00 - 24:00									
Total Rates:			2.152			2.161			4.313

This section displays the trip rate results based on the selected set of surveys and the selected count type (shown just above the table). It is split by three main columns, representing arrivals trips, departures trips, and total trips (arrivals plus departures). Within each of these main columns are three sub-columns. These display the number of survey days where count data is included (per time period), the average value of the selected trip rate calculation parameter (per time period), and the trip rate result (per time period). Total trip rates (the sum of the column) are also displayed at the foot of the table.

To obtain a trip rate, the average (mean) trip rate parameter value (TRP) is first calculated for all selected survey days that have count data available for the stated time period. The average (mean) number of arrivals, departures or totals (whichever applies) is also calculated (COUNT) for all selected survey days that have count data available for the stated time period. Then, the average count is divided by the average trip rate parameter value, and multiplied by the stated calculation factor (shown just above the table and abbreviated here as FACT). So, the method is: COUNT/TRP\*FACT. Trip rates are then rounded to 3 decimal places.

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#### Parameter summary

Trip rate parameter range selected: 10 - 68 (units: )
Survey date date range: 01/01/16 - 06/09/23

Number of weekdays (Monday-Friday): 9
Number of Saturdays: 0
Number of Sundays: 0
Surveys automatically removed from selection: 0
Surveys manually removed from selection: 0

This section displays a quick summary of some of the data filtering selections made by the TRICS® user. The trip rate calculation parameter range of all selected surveys is displayed first, followed by the range of minimum and maximum survey dates selected by the user. Then, the total number of selected weekdays and weekend days in the selected set of surveys are show. Finally, the number of survey days that have been manually removed from the selected set outside of the standard filtering procedure are displayed.

# acstro

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