

# The Hurlstone Partnership

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Mr. L. Toland  
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Our Ref: JPH/jph/151002

12 November 2024

Dear Mr. Toland

**APP/E1885/W/22/3310099 - LEA CASTLE FARM WOLVERLEY - RESPONSE TO ANDREW WEBBER DOC RID58**

As discussed, I have considered the specific points raised by Counsel, as the majority of the points raised were dealt with at the last Appeal, and my comments in response to those are already before the Inspector.

Whilst the traffic survey data shows an increase in motorcycle activity during the summer, this is unsurprising and in line with my own motorcycling activity, which is significantly greater in the summer months, as I am predominantly a fair weather rider. However, the evidence demonstrates that this has not led to an increase in collisions with HGVs on the local road network. As is apparent from collision data across the reports we have prepared, which covers the period 2014 to 2022 inclusive, only a single incident involving an HGV was recorded, which occurred in 2017 at the signal controlled junction, which did not involve a motorcycle. Given the number of HGVs recorded during the various traffic surveys, and the fact that the collision data covers the entire years within the range, it is clear that the local road network is of a sufficient design standard to safely accommodate HGV movements with other users of all types on the road network. It should be noted that contrary to Mr Webber's submission, motorcyclists are not classed as the most vulnerable road users. The most vulnerable road users are those which are not motorised, as Mr. Webber himself confirms under that heading in his note; none of which have been involved in collisions with HGVs over the same period 2014 to 2022 inclusive.

In terms of the lack of a pedestrian survey, due to the routeing of HGVs to / from the east, the potential impact is limited to that corridor, where there is a single footway on the north side of the carriageway from the east; none of which have been involved in collisions with HGVs over the same period 2014 to 2022 inclusive.