

PROPOSED EMPLOYMENT DEVELOPMENT, DEACON BUSINESS PARK, KNOWSLEY, (3836) RESPONSE TO KNOWSLEY COUNCIL HIGHWAYS – JUNE 2023 (PLANNING REF: 23/00215/FUL)

Introduction

Eddisons have been instructed by EEIP II Arundel Propco 2 Holdings Limited to produce a Transport Statement to assist the Local Planning Authority's determination of the following planning application at the Deacon Business Park in Knowsley (Planning Reference: 23/00215/FUL)

"Demolition of existing industrial accommodation and erection of warehouse (Use Class B8) with ancillary offices (Use Class E(g)), reconfigured points of access, new security gatehouses and associated works."

This Transport Note has been produced in response to the comments raised by the highways officers at Knowsley Council in their Consultation Response dated 30th May 2023 and will provide a response to each of the comments as raised within the Consultation Response.

Comment 1 - It is stated on the Proposed Site Plan that vehicles will not be turning right from the northern access. this does not match the modelling assessment which has been completed, which shows vehicles turning right. The modelling needs amending.

Comment noted, the right-turn out of the northern access was included within the assessment as this would provide a worse-case assessment of the operation junction. However, as requested the traffic figures and capacity assessment have been revised to remove the right-turn out of the junction.

Table 1 below, summarises the results of the JUNCTIONS 9 assessments using the 2027 'With Development' Flows, the full output and traffic flows are contained within **Appendix 1**.

Arm	2027 With Development Flows			
	Weekday AM		Weekday PM	
	RFC	Q	RFC	Q
Deacon Business Park Access North	0.06	0	0.11	0
A5027 Moorgate Road North	0.22	0	0.07	0

Table 1 - Summary of JUNCTIONS 9 Results for the A5027 Moorgate Road North/Deacon Business Park Junction – 2027 With Development Flows

As can be seen in Table 1, the proposed A5027 Moorgate Road/North Deacon Business Park junction is forecast to operate well within its theoretical capacity. Based on the above it is concluded that junction can accommodate the levels of traffic forecast to be generated by the proposed development.

Comment 2 - Appendix 4 is missing and needs to be provided

Appendix 4 which is the traffic count data is contained within **Appendix 2** of this Note.

Comment 3 - A swept path will still need to be provided showing an HGV turning in from the north (i.e. left turn) whilst another HGV is waiting to exit. It will not be suitable for a HGV to stop on Moorgate Road to allow for a 2nd HGV to exit due to the restricted visibility this would cause.

Given the nature of the development proposals i.e. 100% B8 land-use, the number of articulated HGV's entering the site from the northern section of the Moorgate Road will be extremely rare as will any instances where a similar size vehicle will be exiting at the same time.

However, this comment is noted, to enable the requested manoeuvre to be undertaken, a minor amendment to the northern kerbline will be required. This can be achieved within land in the adopted highway or the application boundary and will not materially impact on the footway provision.

The revised access arrangement is displayed on **Drawing 3892_Fo1_A** whilst the swept path analysis is shown on **Drawing 3892_SPo5**.

Comment 4 - As stated with Pre app comments, the ghost island right turn at the northern site access will need amendments to restrict HGVs being able to exit and turn right. This would likely mean the central island needs to be extended southwards by circa 8m. Such a design proposal could be provided now, or failing this a condition will be implemented.

Comment noted and the proposed general arrangement for the northern site access has been amended to include the extended central island. The revised layout is displayed in **Drawing 3892_F01_A**.

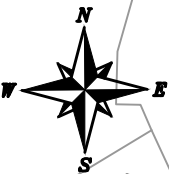
Summary

Based on the above it is the conclusion of this Technical Note that there are no material reasons why the proposed development should not be granted planning consent on highways or transportation grounds.

DRAWINGS



NORTH SOUTH AERIAL VIEW

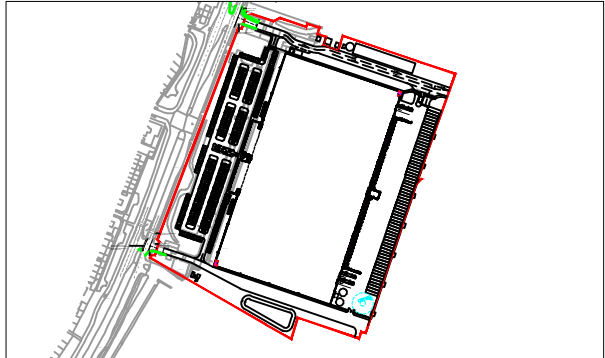


NOTES

THIS IS NOT A CONSTRUCTION DRAWING AND IS FOR INDICATIVE PURPOSES ONLY.
THE DRAWING WILL BE SUBJECT TO CHANGE FOLLOWING LOCAL AUTHORITY REVIEW AND CONFIRMATION OF PUBLIC HIGHWAY AND THIRD PARTY LAND BOUNDARIES.

- INDICATIVE SITE BOUNDARY
- DENOTES NEW KERBS

LOCAL AUTHORITY: KNOWSLEY COUNCIL
TOTAL AREA OF SITE: 8.76Ha



SITE LAYOUT NTS

A	CENTRAL ISLAND AMENDED	HL	JC	JUN 23
REV	DETAILS	DRAWN	CHECKED	DATE

CLIENT:
EEIP II ARUNDEL PROPCO 2 HOLDINGS LIMITED

PROJECT:
DEACON BUSINESS PARK, KNOWSLEY

DRAWING TITLE:
PROPOSED SITE ACCESS PLAN

SCALES:
1:500 @ A3

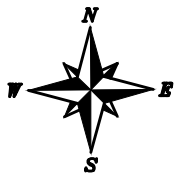
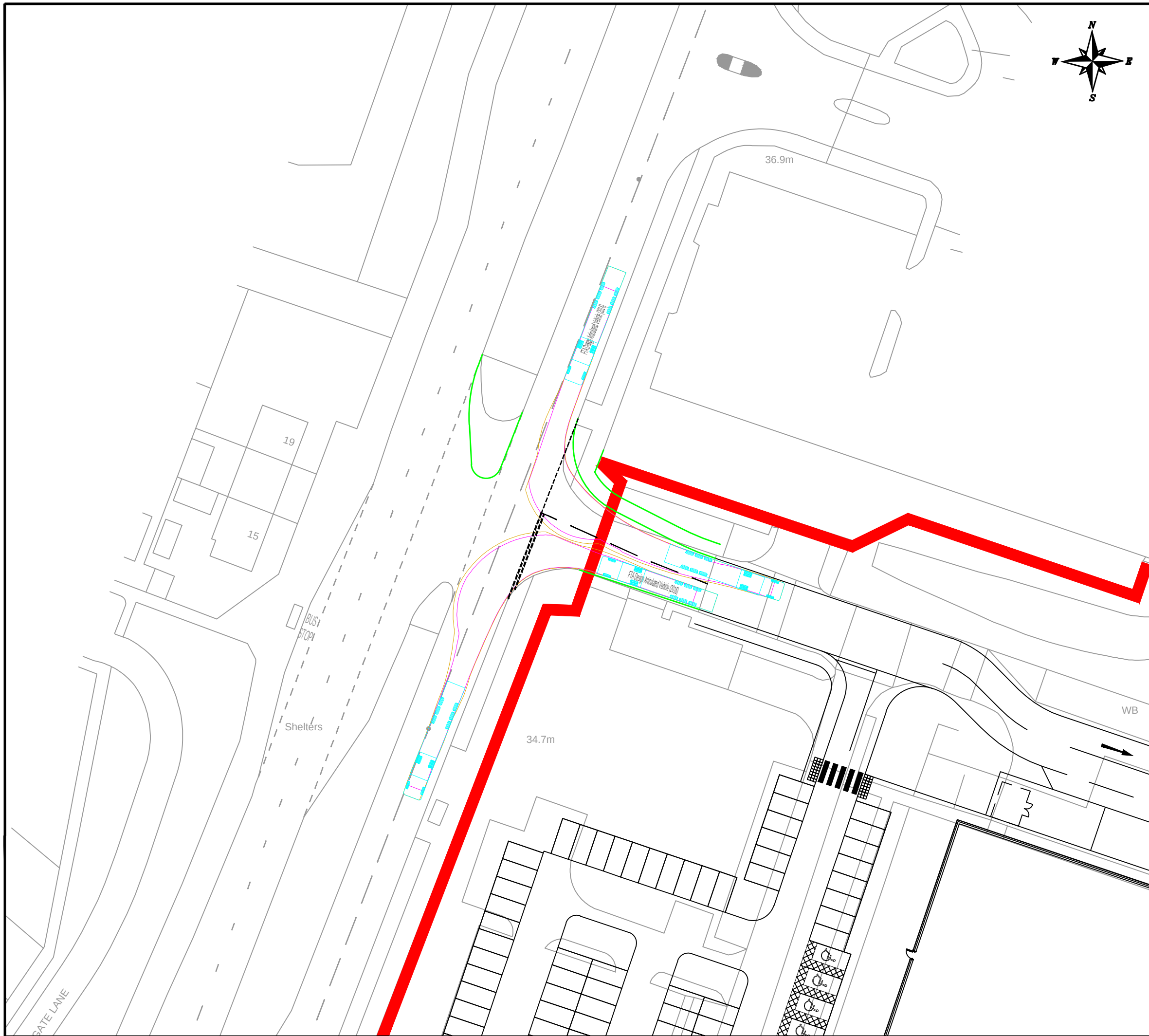
DRAWN:	LB	CHECKED:	MC	DATE:	NOV 22
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Eddisons
340 Deansgate
Manchester
M3 4LY
Email: info@crofts.co.uk
Tel: 0161 837 7380
Web: www.eddisons.com/services/transport-planning

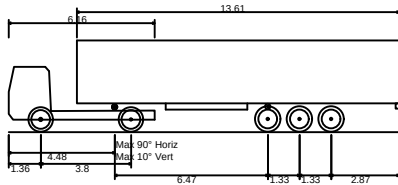
DRAWING NUMBER:	3892-F01	REVISION:	A
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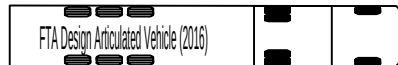
Z:\projects\3892- Deacon Business Park, Knowsley (EQT Exeter)\CAD\Croft Drawings\3892- SP05.dwg



NOTES



FTA Design Articulated Vehicle (2016)
Overall Length 16.480m
Overall Width 2.550m
Overall Body Height 3.870m
Min Body Ground Clearance 0.515m
Max Track Width 2.470m
Lock to lock time 3.00s
Kerb to Kerb Turning Radius 6.600m



REV	DETAILS	DRAWN	CHECKED	DATE
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CLIENT:
EEIP II ARUNDEL PROPCO 2 HOLDINGS LIMITED

PROJECT:
DEACON BUSINESS PARK, KNOWSLEY

DRAWING TITLE:
SWEPT PATH ANALYSIS

SCALES:
1:500 @ A3

DRAWN: HL	CHECKED: JC	DATE: JUN 23
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Eddisons
340 Deansgate
Manchester
M3 4LY
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Web: www.eddisons.com/services/transport-planning

DRAWING NUMBER: 3892-SP05	REVISION: -
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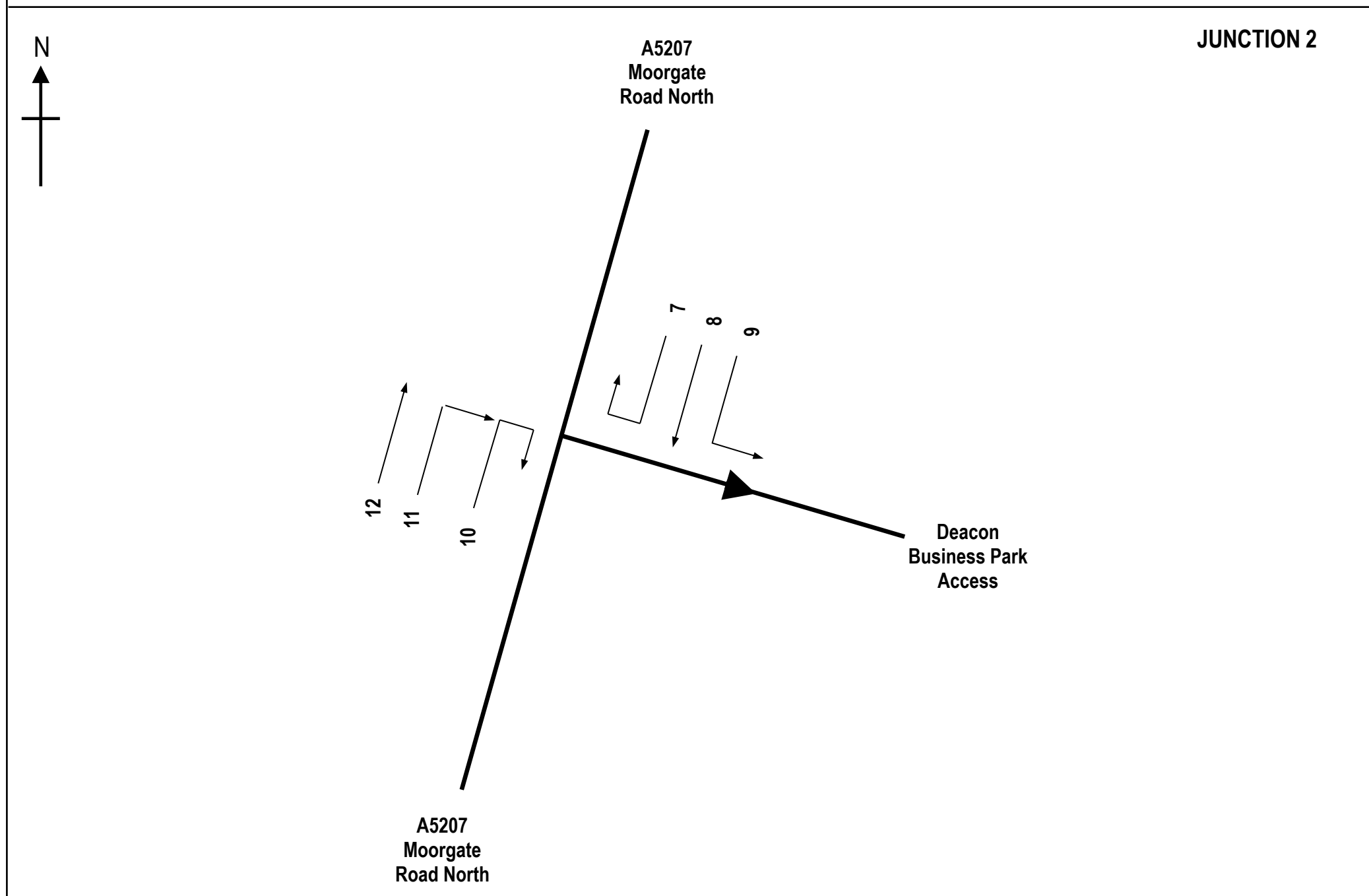
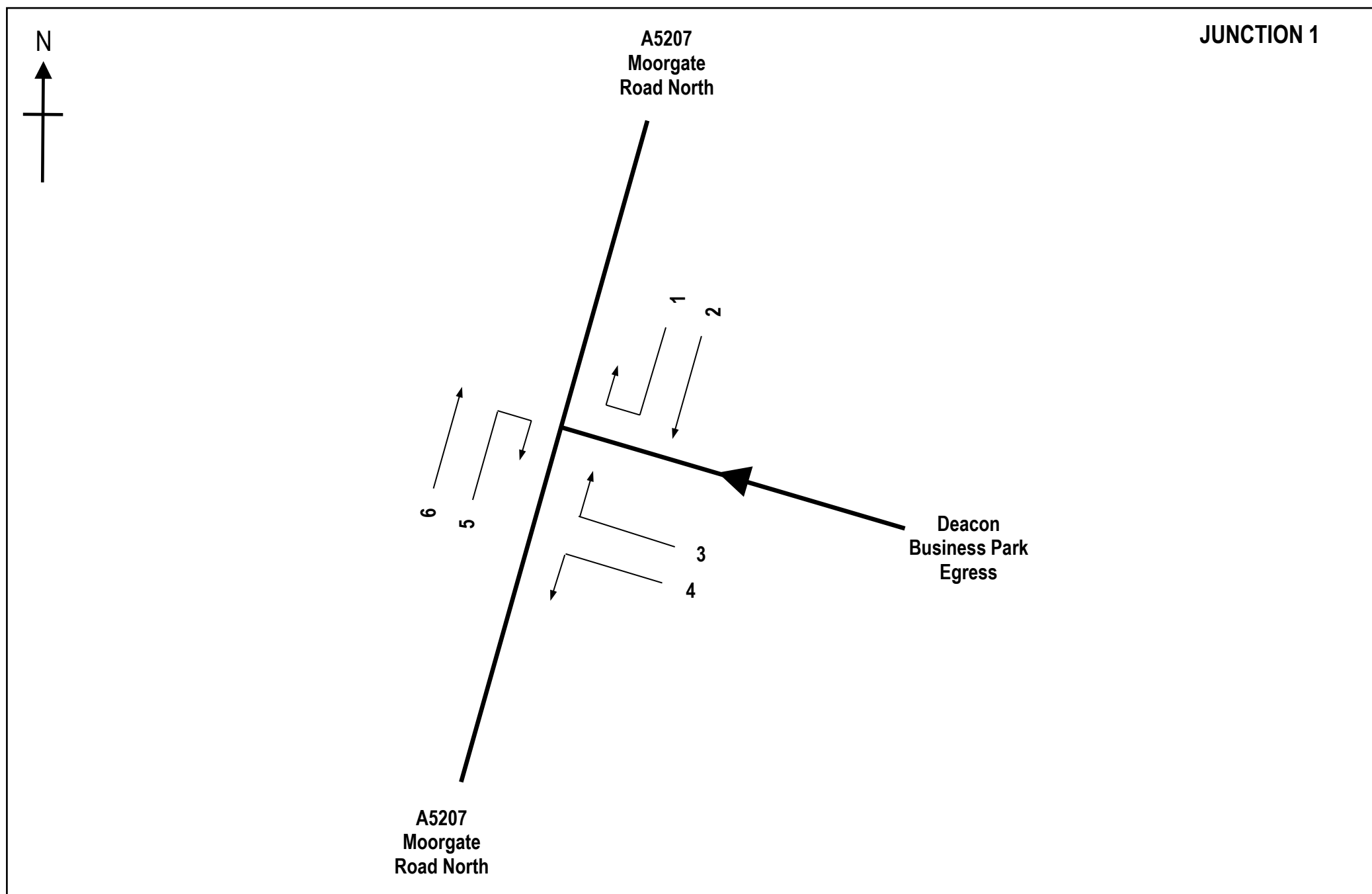
APPENDICES

APPENDIX 1

Traffic Count Data

SURVEY CONTROL

Client:	Eddisons
Client Contact:	Tom Bentley
Survey Location:	Deacon Business Park, Knowsley
Date(s) of Survey:	Tuesday 18th October 2022
Notes:	
On Site Supervisor:	Rachel Wong
Data Checking:	David Cheng
Survey Reference:	22.113 Deacon Business Park, Knowsley
Status:	Final
Date of Issue:	24th October 2022



DRAWING TITLE			
TRAFFIC MOVEMENT REFERENCE			
JOB TITLE			
22.113 DEACON BUSINESS PARK, KNOWSLEY			
DRAWN BY	DATE	SCALE	REF
DC	OCT 2022	NTS	FIGURE 1

**Transport Data
Specialists Ltd**

W: www.transportds.co.uk
E: enquiries@transportds.co.uk
T: 0777 625 2475 T: 0794 007 1260

Time Beginning	A5207 Moorgate Road North/Deacon Business Park Egress - Tuesday 18th October 2022															
	1		2A		2		3		4		5A		5		6	
	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV
0730	0	0	1	0	155	45	7	0	3	0	2	0	0	0	305	29
0745	0	0	0	0	114	45	7	0	5	1	0	0	0	0	382	25
0800	0	0	0	0	165	46	3	0	2	0	0	0	0	1	256	29
0815	0	0	0	0	138	42	2	0	5	0	1	0	0	0	274	27
0830	1	0	2	0	132	45	4	0	9	1	2	0	1	0	222	30
0845	0	0	1	0	143	44	9	0	7	0	3	0	0	0	285	30
0900	1	0	0	0	124	40	7	0	2	1	0	0	0	0	203	39
0915	0	0	1	0	104	44	3	0	3	0	1	0	0	0	164	35
Time Beginning	A5207 Moorgate Road North/Deacon Business Park Egress - Tuesday 18th October 2022															
	1		2A		2		3		4		5A		5		6	
	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV
1600	3	0	0	0	241	32	13	0	26	0	0	0	0	0	194	37
1615	0	0	0	0	155	28	4	0	11	1	0	1	0	0	192	26
1630	0	0	0	0	254	9	11	0	8	0	0	0	0	0	201	21
1645	0	0	2	0	189	15	7	0	26	0	0	1	1	0	282	27
1700	0	0	1	0	275	8	27	0	35	0	1	0	0	0	240	25
1715	0	0	0	0	165	16	12	0	9	0	0	0	1	0	248	15
1730	0	0	0	0	182	8	4	0	4	1	0	0	0	0	265	19
1745	0	0	0	0	155	16	2	0	8	0	0	0	1	0	243	7

Time Beginning	A5207 Moorgate Road North/Deacon Business Park Access - Tuesday 18th October 2022											
	7		8		9		10		11		12	
	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV
0730	0	0	133	51	15	0	0	0	23	1	281	28
0745	1	0	108	44	10	0	0	0	27	0	377	25
0800	0	1	152	46	5	0	0	0	13	0	264	32
0815	5	0	128	42	10	0	0	0	17	2	251	22
0830	9	1	136	47	20	0	0	0	33	2	201	26
0845	0	0	141	44	15	0	0	0	29	1	265	31
0900	3	0	112	42	11	0	0	0	23	0	196	39
0915	2	0	97	47	5	0	0	0	13	3	156	33
Time Beginning	A5207 Moorgate Road North/Deacon Business Park Access - Tuesday 18th October 2022											
	7		8		9		10		11		12	
	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV	LV	HV
1600	7	0	254	30	3	0	0	0	6	0	189	39
1615	2	0	166	22	1	0	0	0	3	1	187	24
1630	4	0	263	11	1	0	0	0	5	1	188	23
1645	1	0	192	17	9	0	1	0	8	0	271	31
1700	9	0	299	8	3	0	0	0	6	0	224	25
1715	12	1	178	16	3	0	0	0	0	1	247	16
1730	11	0	196	10	0	0	1	0	1	1	263	15
1745	7	0	147	15	4	0	0	0	4	0	244	11

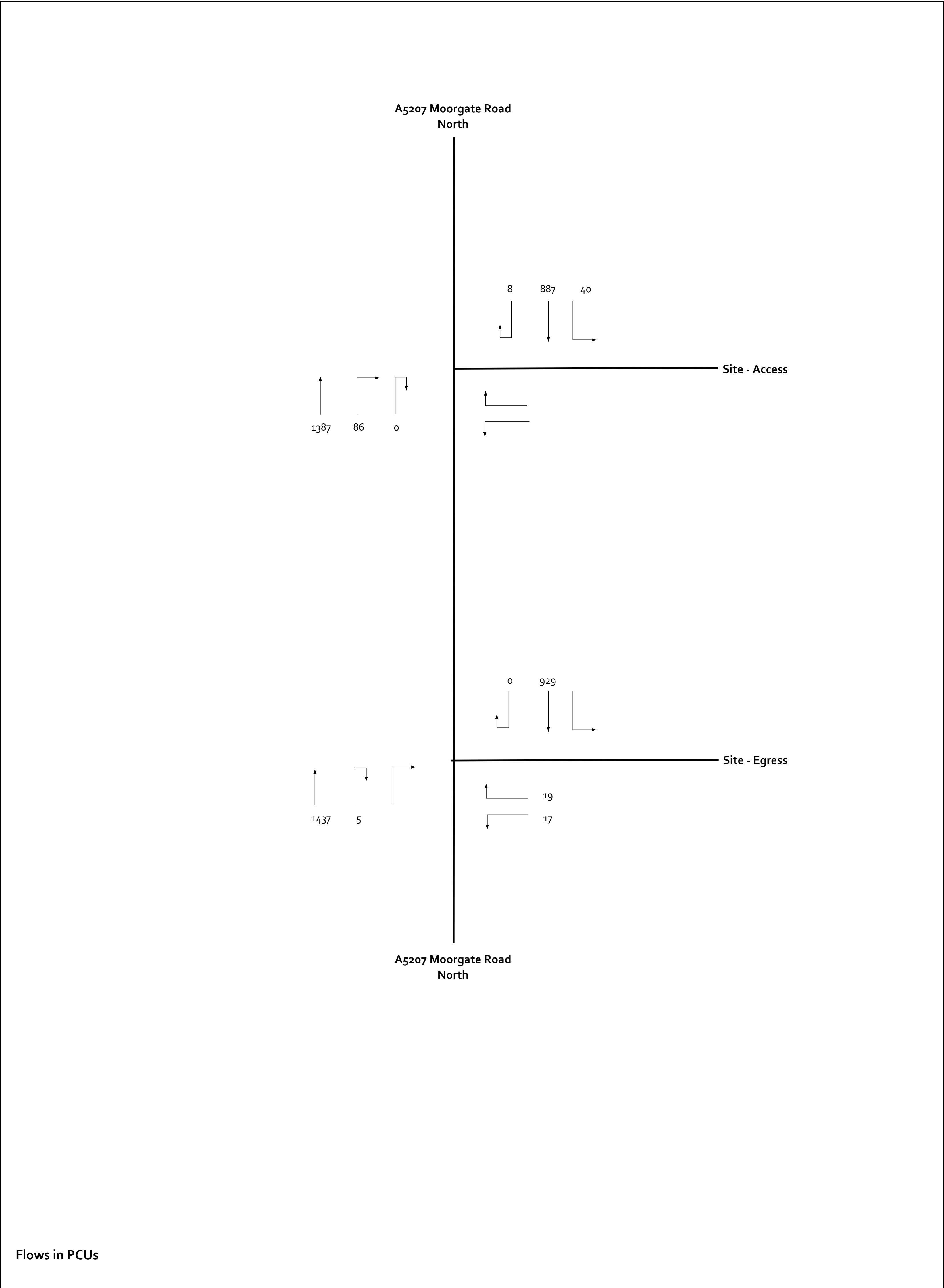


Figure 1 2022 Surveyed Flows - Weekday AM Peak (0730 - 0830)



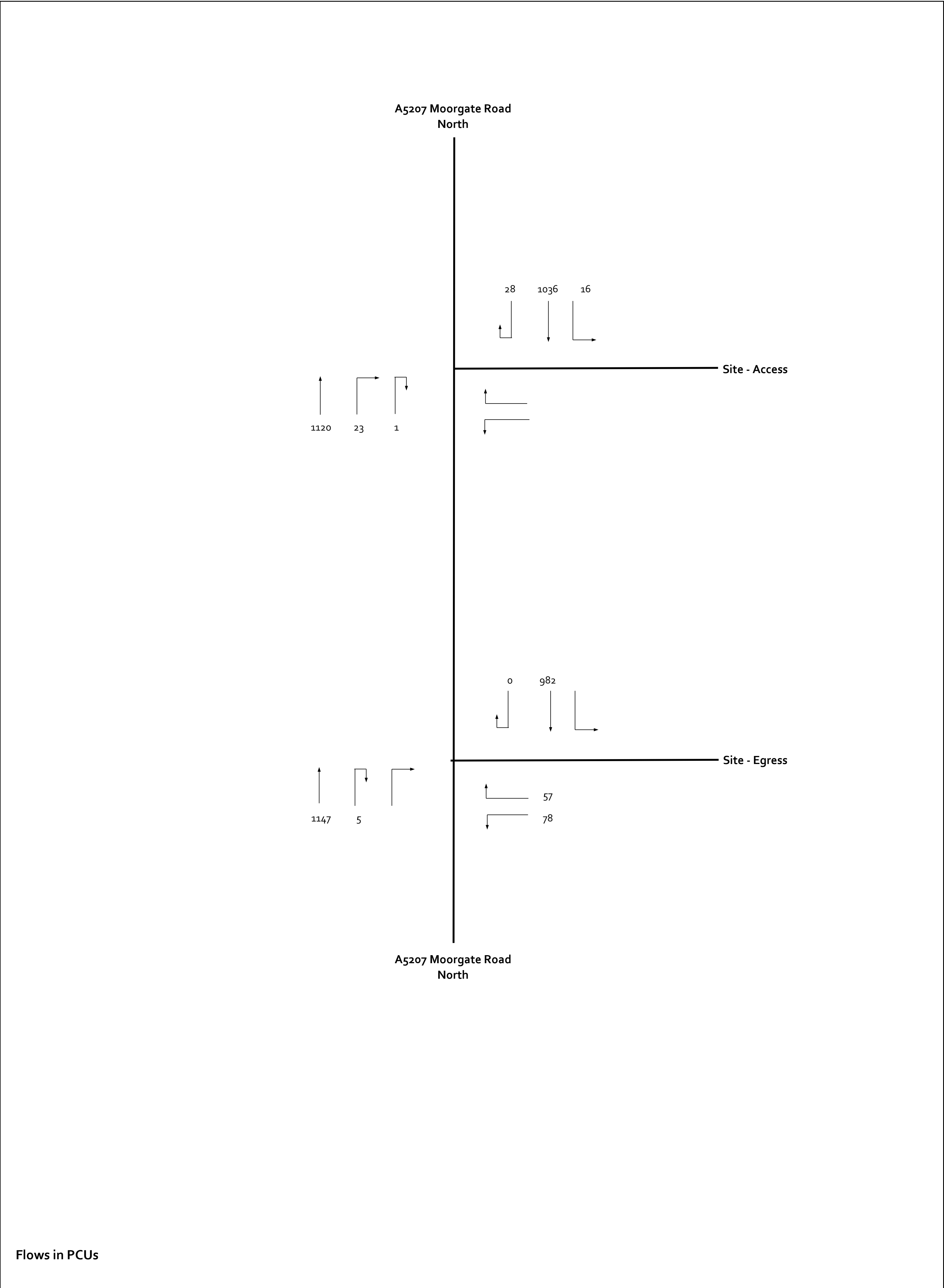
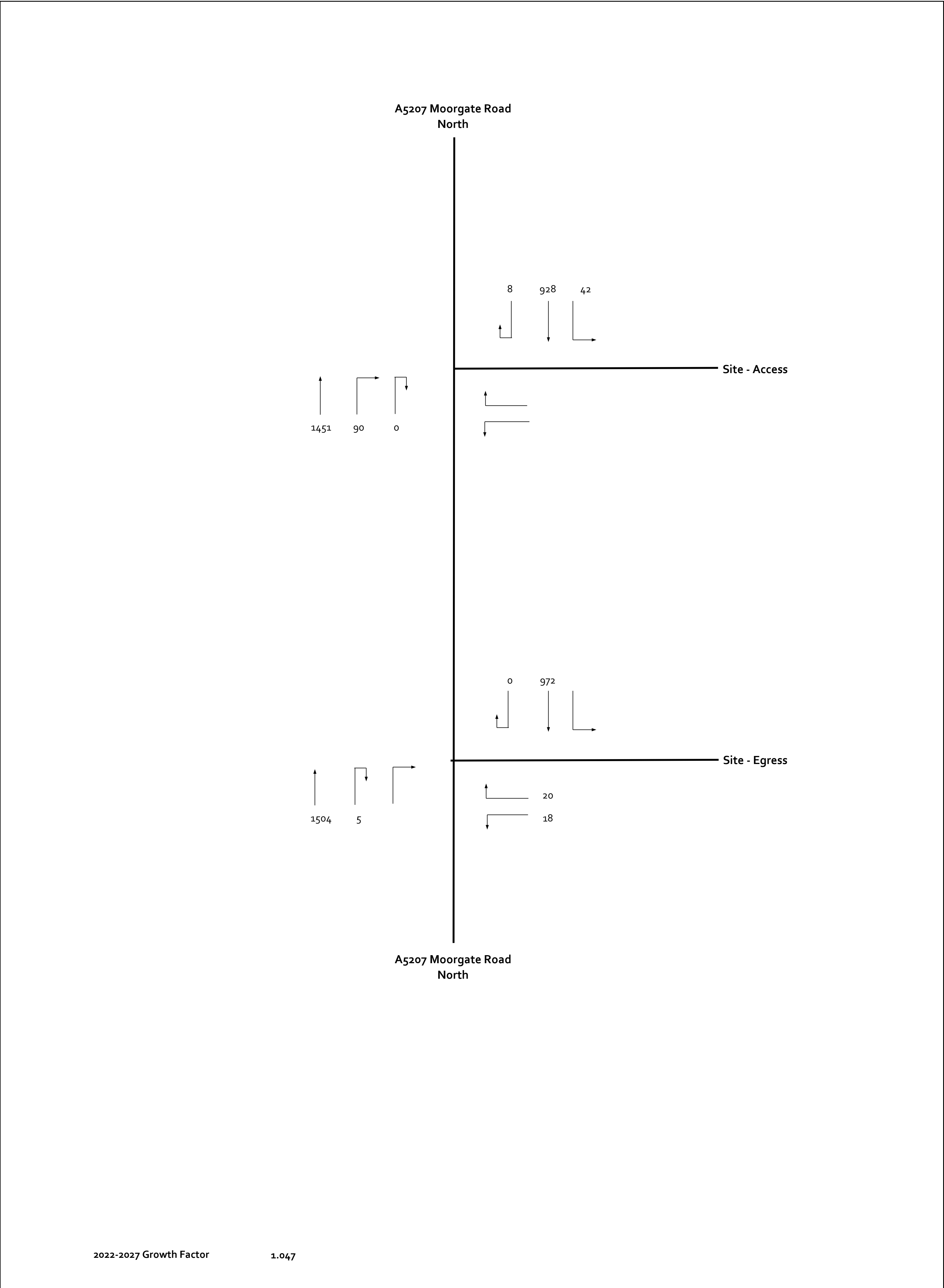


Figure 2 2022 Surveyed Flows - Weekday PM Peak (1630 - 1730)





2022-2027 Growth Factor 1.047

Figure 3 2027 Growthed Flows - Weekday AM Peak



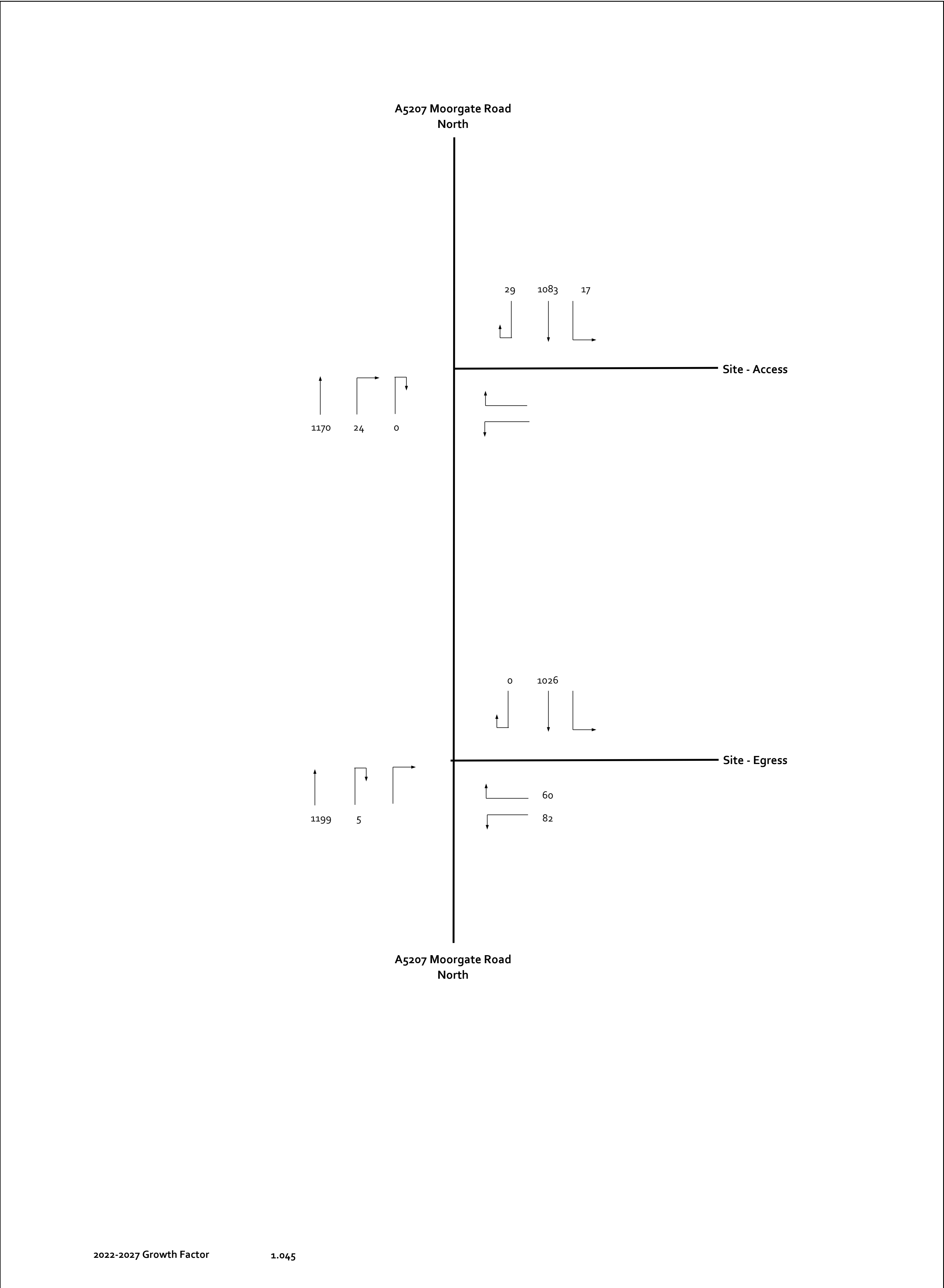


Figure 4 2027 Growthed Flows - Weekday PM Peak



ARR
DEP

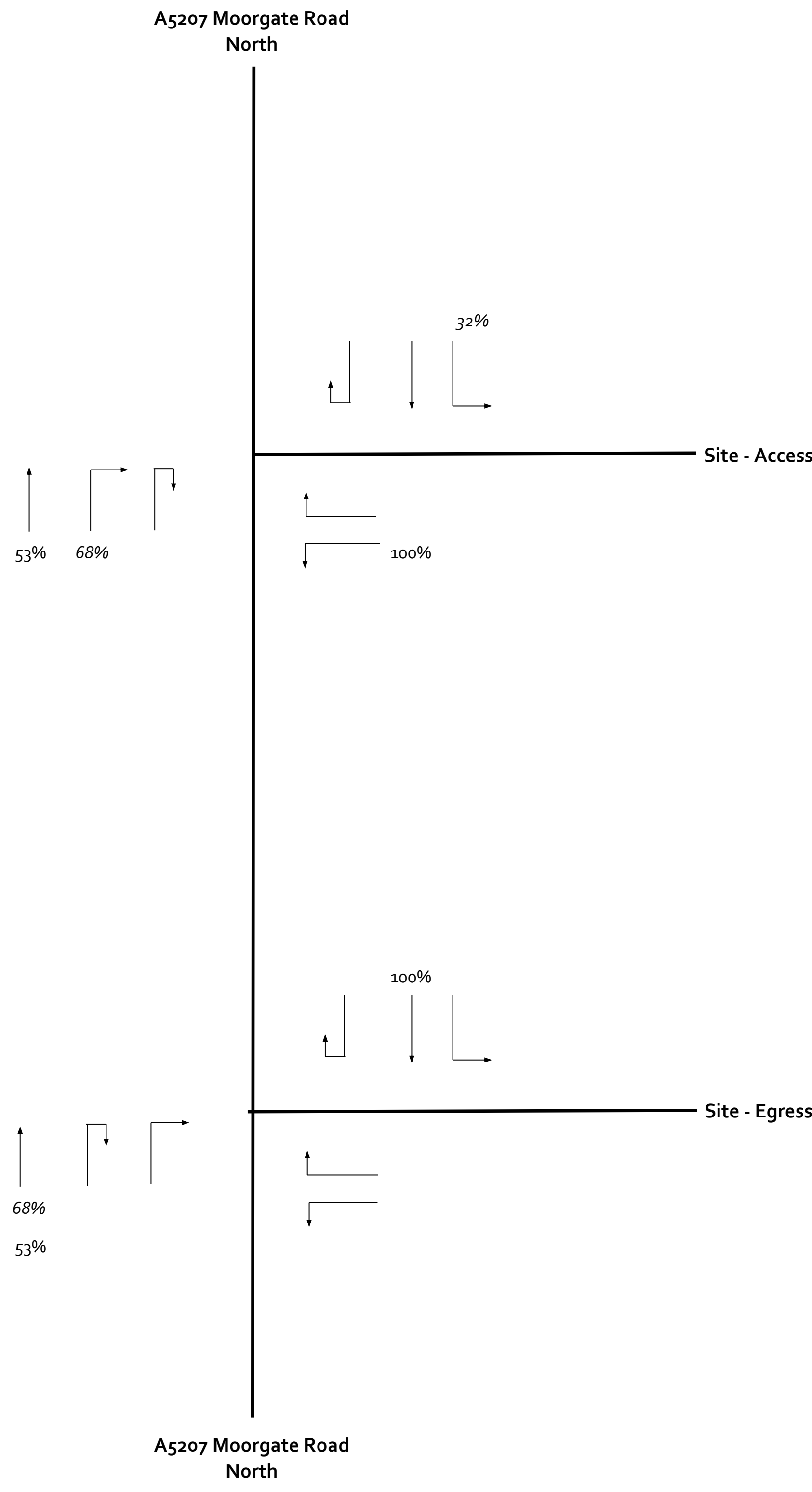


Figure 5 Proposed Trip Distribution - Weekday AM Peak



ARR
DEP

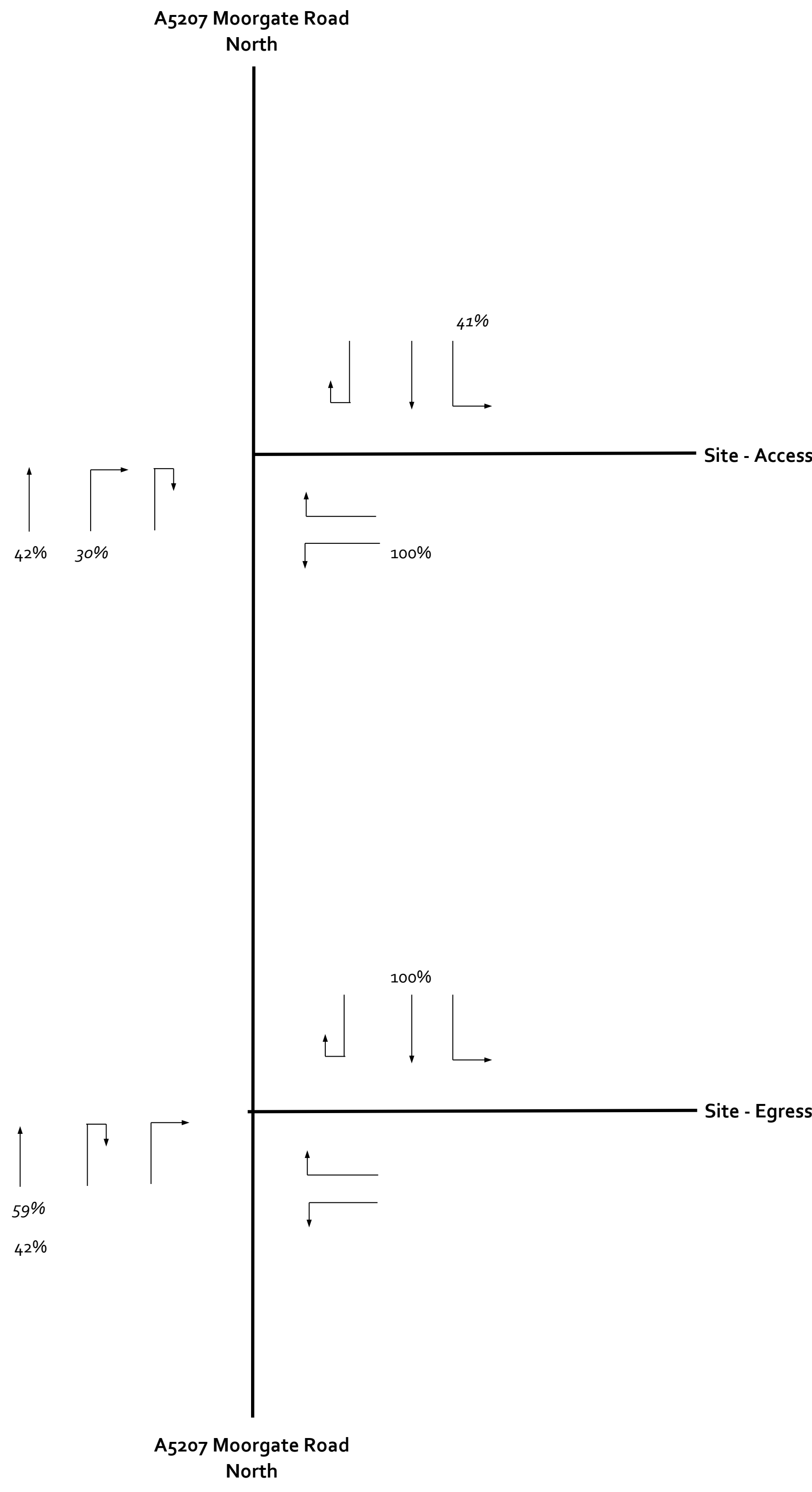
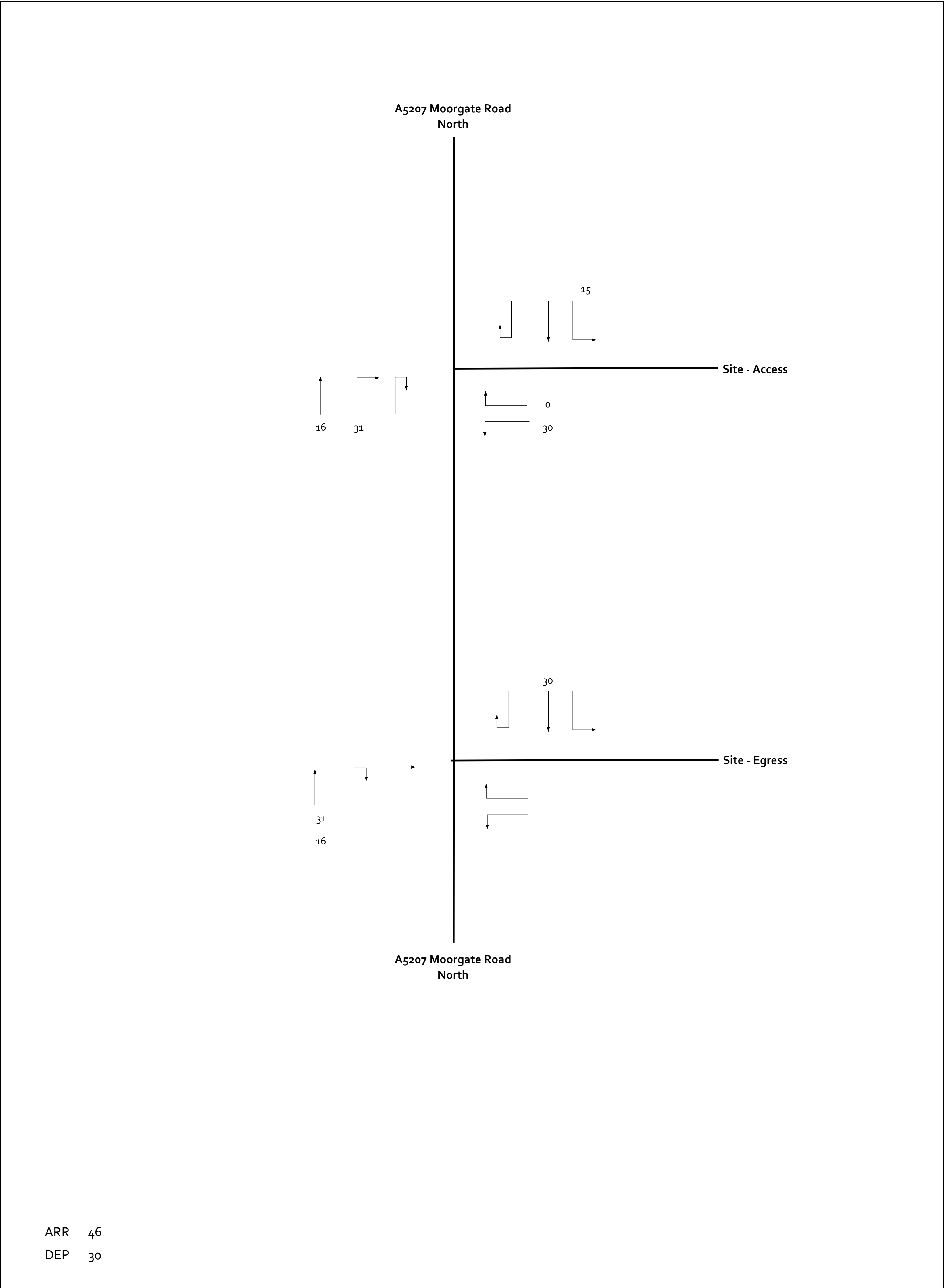


Figure 6 Proposed Trip Distribution - Weekday PM Peak





ARR 46
DEP 30

Figure 7 Proposed Development Flows - Weekday AM Peak



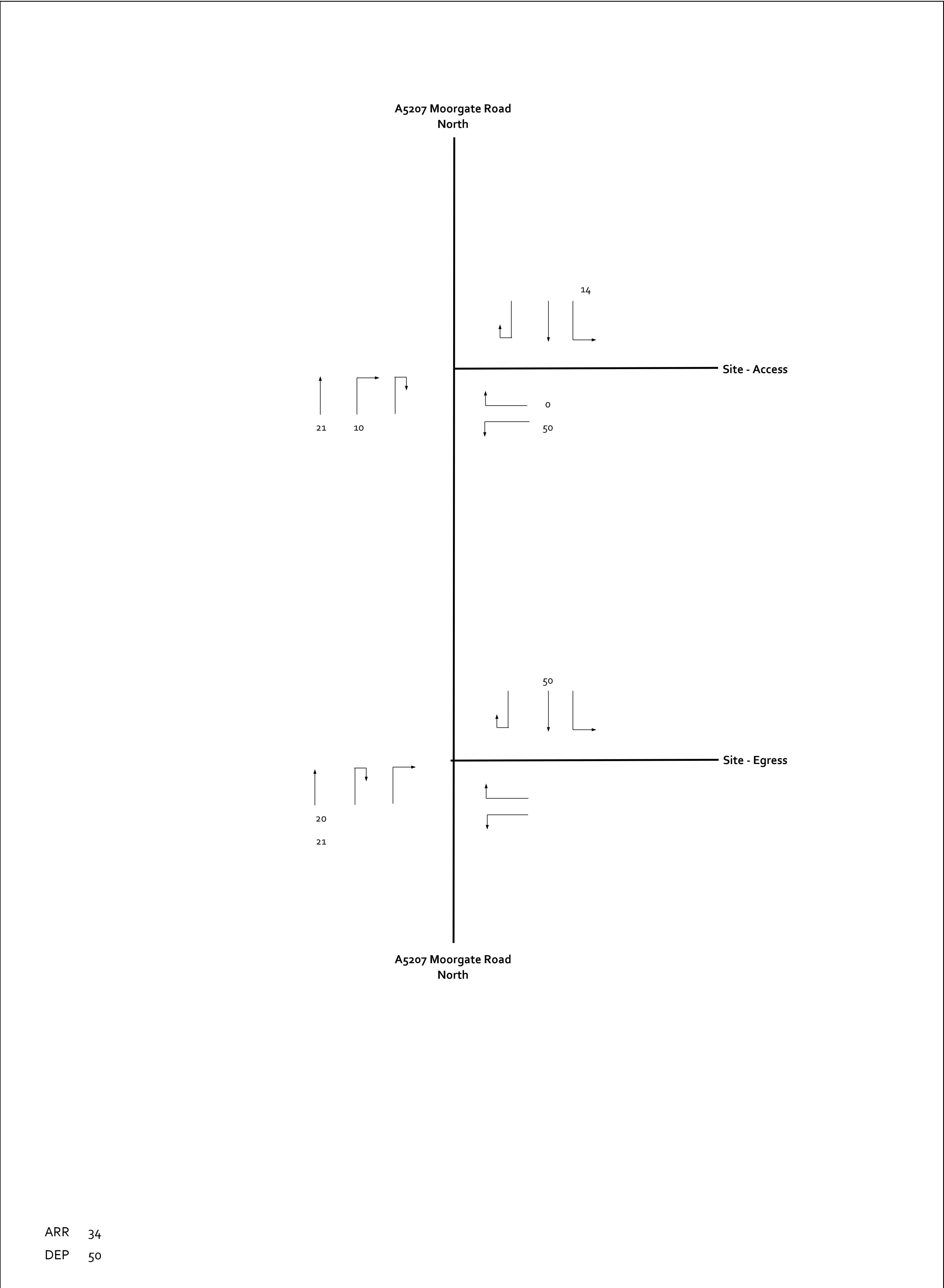


Figure 6 Proposed Development Flows - Weekday PM Peak



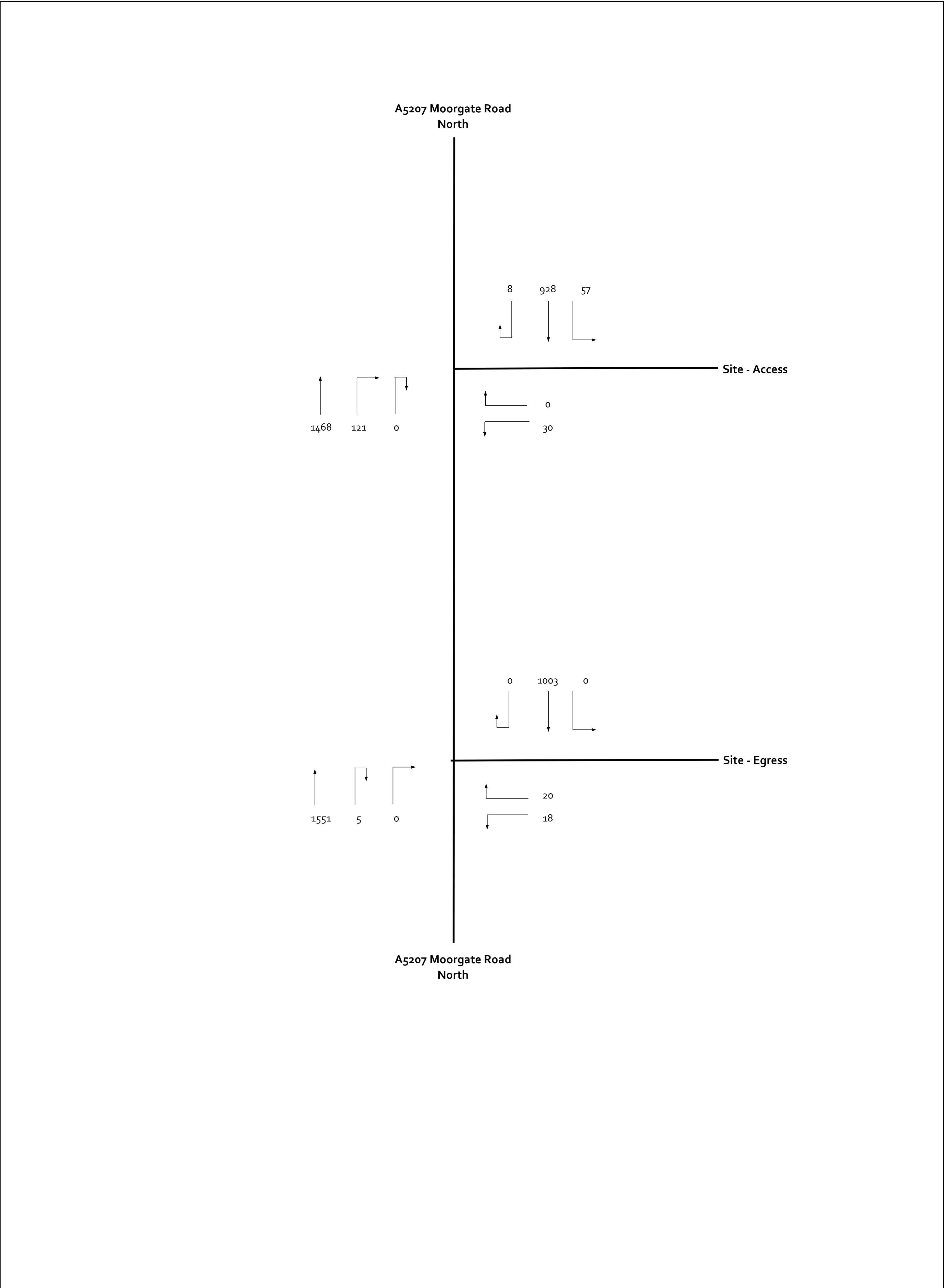


Figure 9 2027 With Development Flows - Weekday AM Peak



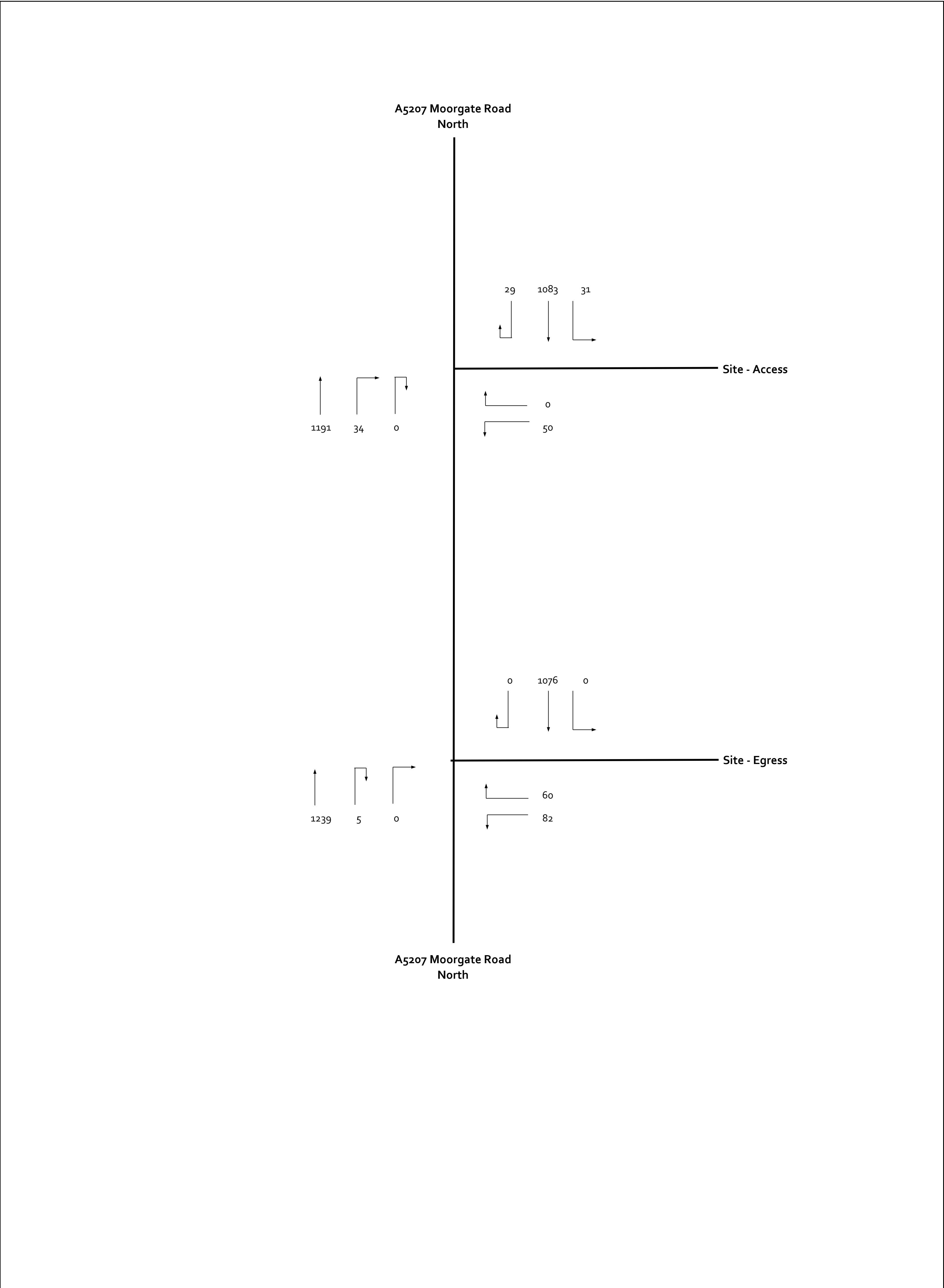


Figure 10 2027 With Development Flows - Weekday PM Peak



APPENDIX 2

JUNCTIONS 8 Output – Moorgate Road North/Site Access

Junctions 9									
PICADY 9 - Priority Intersection Module									
Version: 9.5.2.1013									
© Copyright TRL Limited, 2019									
For sales and distribution information, program advice and maintenance, contact TRL:									
+44 (0)1344 379777 software@trl.co.uk www.trlsoftware.co.uk									
The users of this computer program for the solution of an engineering problem are in no way relieved of their responsibility for the correctness of the solution									

Filename: Moorgate Road North - (Northern) Site Access - June 2023.j9
 Path: Z:\projects\3892 Deacon Business Park, Knowsley (EQT Exeter)\Picady
 Report generation date: 13/06/2023 14:12:48

»2027 With Development, AM
 »2027 With Development, PM

Summary of junction performance

	AM					PM				
	Set ID	Queue (PCU)	Delay (s)	RFC	LOS	Set ID	Queue (PCU)	Delay (s)	RFC	LOS
2027 With Development										
Stream B-AC	D1	0.1	7.54	0.06	A	D2	0.1	8.46	0.11	A
Stream C-AB		0.3	7.61	0.22	A		0.1	6.70	0.07	A

Values shown are the highest values encountered over all time segments. Delay is the maximum value of average delay per arriving vehicle.

File summary

File Description

Title	Moorgate Road North - Site Access
Location	Liverpool
Site number	
Date	16/11/2022
Version	
Status	(new file)
Identifier	
Client	
Jobnumber	3892
Enumerator	EDD
Description	

Units

Distance units	Speed units	Traffic units input	Traffic units results	Flow units	Average delay units	Total delay units	Rate of delay units
m	kph	PCU	PCU	perHour	s	-Min	perMin

Analysis Options

Vehicle length (m)	Calculate Queue Percentiles	Calculate detailed queueing delay	Calculate residual capacity	RFC Threshold	Average Delay threshold (s)	Queue threshold (PCU)
5.75				0.85	36.00	20.00

Demand Set Summary

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D1	2027 With Development	AM	ONE HOUR	00:00	01:30	15	✓
D2	2027 With Development	PM	ONE HOUR	00:00	01:30	15	✓

Analysis Set Details

ID	Include in report	Network flow scaling factor (%)	Network capacity scaling factor (%)
A1	✓	100.000	100.000

2027 With Development, AM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	untitled	T-Junction	Two-way		0.44	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Arms

Arms

Arm	Name	Description	Arm type
A	Moorgate Road North (N)		Major
B	Northern Site Access		Minor
C	Moorgate Road North (S)		Major

Major Arm Geometry

Arm	Width of carriageway (m)	Has kerbed central reserve	Has right turn bay	Width for right turn (m)	Visibility for right turn (m)	Blocks?	Blocking queue (PCU)
C	15.00		✓	5.00	90.0	✓	7.00

Geometries for Arm C are measured opposite Arm B. Geometries for Arm A (if relevant) are measured opposite Arm D.

Minor Arm Geometry

Arm	Minor arm type	Lane width (m)	Visibility to left (m)	Visibility to right (m)
B	One lane	3.65	32	22

Slope / Intercept / Capacity

Priority Intersection Slopes and Intercepts

Stream	Intercept (PCU/hr)	Slope for A-B	Slope for A-C	Slope for C-A	Slope for C-B
B-A	531	0.059	0.149	0.094	0.213
B-C	679	0.063	0.160	-	-
C-B	817	0.193	0.193	-	-

The slopes and intercepts shown above do NOT include any corrections or adjustments.

Streams may be combined, in which case capacity will be adjusted.

Values are shown for the first time segment only; they may differ for subsequent time segments.

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D1	2027 With Development	AM	ONE HOUR	00:00	01:30	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A		ONE HOUR	✓	994	100.000
B		ONE HOUR	✓	30	100.000
C		ONE HOUR	✓	1589	100.000

Origin-Destination Data

Demand (PCU/hr)

From	To			
	A	B	C	
	A	0	57	937
	B	0	0	30
	C	1468	121	0

Vehicle Mix

Heavy Vehicle Percentages

From	To			
	A	B	C	
	A	0	0	0
	B	0	0	0
	C	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-AC	0.06	7.54	0.1	A	28	41
C-AB	0.22	7.61	0.3	A	111	167
C-A					1347	2021
A-B					52	78
A-C					860	1290

Main Results for each time segment

00:00 - 00:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	23	6	564	0.040	22	0.0	0.0	6.650	A
C-AB	91	23	673	0.135	90	0.0	0.2	6.176	A
C-A	1105	276			1105				
A-B	43	11			43				
A-C	705	176			705				

00:15 - 00:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	27	7	541	0.050	27	0.0	0.1	7.000	A
C-AB	109	27	645	0.169	109	0.2	0.2	6.712	A
C-A	1320	330			1320				
A-B	51	13			51				
A-C	842	211			842				

00:30 - 00:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	33	8	510	0.065	33	0.1	0.1	7.545	A
C-AB	133	33	606	0.220	133	0.2	0.3	7.602	A
C-A	1616	404			1616				
A-B	63	16			63				
A-C	1032	258			1032				

00:45 - 01:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	33	8	510	0.065	33	0.1	0.1	7.545	A
C-AB	133	33	606	0.220	133	0.3	0.3	7.611	A
C-A	1616	404			1616				
A-B	63	16			63				
A-C	1032	258			1032				

01:00 - 01:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	27	7	541	0.050	27	0.1	0.1	7.002	A
C-AB	109	27	645	0.169	109	0.3	0.2	6.722	A
C-A	1320	330			1320				
A-B	51	13			51				
A-C	842	211			842				

01:15 - 01:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	23	6	564	0.040	23	0.1	0.0	6.654	A
C-AB	91	23	673	0.135	91	0.2	0.2	6.194	A
C-A	1105	276			1105				
A-B	43	11			43				
A-C	705	176			705				

2027 With Development, PM

Data Errors and Warnings

No errors or warnings

Junction Network

Junctions

Junction	Name	Junction type	Major road direction	Use circulating lanes	Junction Delay (s)	Junction LOS
1	untitled	T-Junction	Two-way		0.27	A

Junction Network Options

Driving side	Lighting
Left	Normal/unknown

Traffic Demand

Demand Set Details

ID	Scenario name	Time Period name	Traffic profile type	Start time (HH:mm)	Finish time (HH:mm)	Time segment length (min)	Run automatically
D2	2027 With Development	PM	ONE HOUR	00:00	01:30	15	✓

Vehicle mix varies over turn	Vehicle mix varies over entry	Vehicle mix source	PCU Factor for a HV (PCU)
✓	✓	HV Percentages	2.00

Demand overview (Traffic)

Arm	Linked arm	Profile type	Use O-D data	Average Demand (PCU/hr)	Scaling Factor (%)
A		ONE HOUR	✓	1143	100.000
B		ONE HOUR	✓	50	100.000
C		ONE HOUR	✓	1280	100.000

Origin-Destination Data

Demand (PCU/hr)

	To			
	A	B	C	
From	A	0	31	1112
	B	0	0	50
	C	1228	34	0

Vehicle Mix

Heavy Vehicle Percentages

	To			
	A	B	C	
From	A	0	0	0
	B	0	0	0
	C	0	0	0

Results

Results Summary for whole modelled period

Stream	Max RFC	Max Delay (s)	Max Queue (PCU)	Max LOS	Average Demand (PCU/hr)	Total Junction Arrivals (PCU)
B-AC	0.11	8.46	0.1	A	46	69
C-AB	0.07	6.70	0.1	A	31	47
C-A					1125	1687
A-B					28	43
A-C					1020	1531

Main Results for each time segment

00:00 - 00:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	38	9	544	0.069	37	0.0	0.1	7.113	A
C-AB	26	6	651	0.039	25	0.0	0.0	5.751	A
C-A	923	231			923				
A-B	23	6			23				
A-C	837	209			837				

00:15 - 00:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	45	11	517	0.087	45	0.1	0.1	7.625	A
C-AB	31	8	619	0.049	31	0.0	0.1	6.117	A
C-A	1102	276			1102				
A-B	28	7			28				
A-C	1000	250			1000				

00:30 - 00:45

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	55	14	481	0.114	55	0.1	0.1	8.453	A
C-AB	37	9	575	0.065	37	0.1	0.1	6.701	A
C-A	1350	337			1350				
A-B	34	9			34				
A-C	1224	306			1224				

00:45 - 01:00

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	55	14	481	0.114	55	0.1	0.1	8.458	A
C-AB	37	9	575	0.065	37	0.1	0.1	6.701	A
C-A	1350	337			1350				
A-B	34	9			34				
A-C	1224	306			1224				

01:00 - 01:15

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	45	11	517	0.087	45	0.1	0.1	7.633	A
C-AB	31	8	619	0.049	31	0.1	0.1	6.121	A
C-A	1102	276			1102				
A-B	28	7			28				
A-C	1000	250			1000				

01:15 - 01:30

Stream	Total Demand (PCU/hr)	Junction Arrivals (PCU)	Capacity (PCU/hr)	RFC	Throughput (PCU/hr)	Start queue (PCU)	End queue (PCU)	Delay (s)	Unsignalised level of service
B-AC	38	9	544	0.069	38	0.1	0.1	7.124	A
C-AB	26	6	651	0.039	26	0.1	0.0	5.755	A
C-A	923	231			923				
A-B	23	6			23				
A-C	837	209			837				