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28th November 2017

PROPOSED RESIDENTIAL DEVELOPMENT AT PIRTON BY CALA HOMES LIMITED
APPLICATIONS 17/02807/1 AND 17/02778/1 TO REMOVE CONDITION NO.6 ATTACHED TO
PLANNING PERMISSION 15/01618/1 DATED 27.05.16

1.0 INTRODUCTION

1.1 Condition No.6 states:

Prior to the commencement of the development full details of a Construction Management Plan shall be submitted to the Local Planning Authority for approval in writing. The Construction Management Plan shall contain the program of works on site, area of construction vehicle parking, storage and delivery of materials within the development site, construction vehicles wheel washing facilities, and details construction vehicle routing to and from the site.

1.2 The reason for imposing this condition is stated as:

In the interests of maintaining highway efficiency and safety.



1.3 These photos illustrate the type of issues that need to be addressed on the construction route in order to meet acceptable standards of efficiency and safety, as required by Condition No.6. The current traffic levels are low and the percentage of heavy vehicles is relatively tiny. Nonetheless, it can be seen that conditions of efficiency and safety are already unacceptable. Whilst the accident record is not a current concern, the proposed substantial increase in heavy vehicles will certainly increase the potential for accidents. In terms of the efficiency for existing users of the route, any increase in traffic, especially heavy goods vehicles, will make matters worse, unless significant improvements are introduced.

1.4 The photos illustrate extreme narrowness of the carriageway, severe restrictions on forward visibility around the bends and erosion of verges, resulting in mud on the road surface. The most dangerous

feature illustrated is the approaching lorry on the wrong side of the road at a blind corner. Mud on the road will adversely affect the braking of vehicles in an emergency. As previously stated, the current level of heavy vehicles is very low, but under Cala's proposals, that will increase, on average, by around one extra HGV passing every 6 minutes. The efficiency and safety for existing users of the route will become even more unacceptable, unless substantial improvements are provided

- 1.5 All parties including Cala, the local residents, the local planning authority and the local highway authority, agree that in its present state, the Holwell route is not suitable for unlimited construction purposes. Interestingly, at para. 3.1.4 of their Construction Management Plan dated the 31st October 2017, Cala states:

The access route into site comprises of narrow country roads which are not suitable for large articulated construction vehicles. Deliveries to site will be made by rigid vehicles as these are able to better navigate around the roads and into the site.

- 1.6 So, what are Cala,s proposals for rendering the route efficient and safe for use by their construction vehicles and more importantly, use by other users of the route. There are two proposals in two separate applications. One application, 17/02807/1, proposes no material improvements and clearly this application should be refused as was the original application. This application will not be considered further. The second application 17/02778/1 proposes operational controls with 6No. laybys to facilitate the passage of two heavy vehicles at those limited locations. This submission, on behalf of local residents under the umbrella of HACT, will concentrate on this more detailed application, under the relevant headings of efficiency and Safety, which constitute the purpose of Condition No.6.

2.0 EFFICIENCY.

- 2.1 Efficiency is a measure of smoothness of flow along a route without undue interruption and certainly without being exposed to an undue potential for danger. The route is used by vehicles, horses and pedestrians. Usually, the efficiency and safety of travel is assisted by the segregation of different types of users, but in this case, it is accepted that full segregation would not be a reasonable requirement and therefore in considering vehicle flow, the interaction between the various types of users of the same road surface, should be borne in mind. Clearly, the interaction between heavy vehicles and pedestrians using the same road surface, is a particular concern.
- 2.2 Cala acknowledge that the existing route is unsuitable for articulated lorries, which are around 16.5m long. The cab and trailer is articulated to improve manoeuvrability, but Cala wish to eliminate this type of vehicle in favour of the controlled adoption of 12m long rigid vehicles as the maximum size to be used in normal circumstances. However, in many ways, the 12m rigid vehicle is less manoeuvrable than the artic and more to the point, it is of the same width as the artic. Therefore, there can be no argument that they are more suited to narrow roads, sharp bends and limited forward visibility.
- 2.3 The physical characteristics of both vehicles are so similar that there is no material advantage in downsizing the capacity of the vehicle to 12m. This means that there will be a greater number of vehicles and their frequency would be increased by the agreement to limit the working day to 5.5 hours between 9.30am and 3.00pm, to avoid peak school times.

- 2.4 It is assumed that these timings are applied to the site entrance and exit, but to avoid any clash with peak school times, there must be no heavy delivery or collection vehicles on any part of the route between 9.30am and 3.00pm. Otherwise, given the time to travel the route, heavy vehicles would conflict with school times before 9.00am and after 3.00pm.
- 2.5 The HGV numbers increase as a result of the lower capacity of the vehicles and the combination of this and a reduced working day, results in an extension of the construction period by up to one year beyond the 3 years, originally estimated. When the inefficiency and damage associated with existing traffic, is compared with an increase including one HGV every 6 minutes, it becomes clear that there is a considerable problem to address.
- 2.6 All vehicles using the route efficiently, must be able to safely negotiate the route without obstructing traffic. The scale of the problems here can be identified with the aid of vehicle swept path analysis software. Swept path analysis for different types of vehicle flowing on a road assists designers in determining the layout of a route that provides for all the required manoeuvres in a safe and suitable manner.
- 2.7 For some time now, such analysis has been demanded by the residents to support the contention of Cala and the officers of the two authorities, that the proposals for six laybys will render the Holwell route both efficient and safe and for use by existing traffic and the predicted increase in construction traffic. A tracking analysis has been produced, but this shows only the isolated passage of a single heavy vehicle one-way. It shows no opposing traffic flow. The laybys are shown capable of accommodating one large vehicle stationery, whilst another is passing. This is useless and is equivalent to the whole route being operated as a single lane accommodating 2-way flow controlled by traffic signals either end. What is required is an analysis that shows two heavy vehicles passing each other continuously over the whole route. This will identify where widening is required to allow efficient and convenient travel by all vehicles.
- 2.8 The Holwell route is a bus route. The Highway Authority's **minimum standard** for a purpose-built bus route is a carriageway 6.75m wide. The existing route falls way short of this standard. Clearly, the Highway Authority is not demanding this scale of improvement and the residents would be opposed to the environmental damage to the character of their village by such a scheme. Therefore, compromises are not opposed in principle, but those compromises must not be reduced to a level that breaches the requirements of Condition No.6
- 2.9 The maximum width of the 12m long lorries to be used is 2.55m. Two lorries would occupy 5.1m and this does not include mirrors or the clearance between lorries and the edge of carriageway. Allowing for reasonable clearances, the minimum width of carriageway should be 6.2m ($2 \times 2.55 + 2 \times 0.3 + 0.5$). These are measurements on the straight. Increased carriageway width would be required around bends, especially sharp bends. Evidence supplied by Cala, confirms that much of the route is less than 4.8m, which is the minimum width for a lorry to pass a large car on the straight.
- 2.10 The existing route has severe shortcomings and in the absence of appropriate 'tracking', it is impossible for anyone to demonstrate the route will operate with the degree of efficiency and safety required by Condition No.6. Considerable widening is required and the removal of roadside trees and hedges will have implications on the environmental character of the village and this can be imagined by looking at the above photo showing the hedging that would need to be removed around the sharp bend.

- 2.11 It is possible that proper tracking analysis has been undertaken but the results, being damaging to Cala, have not been revealed. It is imperative that the Committee is furnished with all the appropriate evidence to demonstrate beyond doubt that a safe and efficient route will be provided for the purpose of construction. Seemingly, the officers of the two authorities have agreed to recommend the removal of Condition No.6 without any technical demonstration that the protection afforded by the condition can be justifiably removed. If the condition is removed without justification, then a precedent will be set that the minimum and absolute minimum highway design standards adopted by the County Highway Authority, are not in fact the minimum acceptable.

3.0 SAFETY

- 3.1 A Safety Appraisal has been undertaken for Cala by Mayer Brown Consultants and their report is attached as a supporting document to the application. This appraisal is very basic and lacks detail in terms of the geometric layout of the route and the existing traffic flowing on it. The report merely refers generally, to narrow carriageways, sharp bends and limited forward visibility, without defining what dimensions are available and how they compare to minimum safe standards.
- 3.2 There is a brief analysis of past accidents which numerically, are agreed not to be of particular concern, but this is an appraisal of the existing conditions. This is very unhelpful to the Committee, who are concerned with what the effects of the additional construction traffic upon highway safety would be. They need a risk assessment analysis of the proposed conditions, not existing conditions. This is absent.
- 3.3 Existing conditions on the Holwell route reflect what could be expected on an access road in a purpose-designed residential area, where design would limit traffic to below 300 vehicles per hour and where heavy vehicles would be a tiny fraction of that total. Accordingly, the design would be based on low speeds and minimum standards for safety and geometry.
- 3.4 Therefore, in predicting the effects of the use of the Holwell route, used as a construction route, would be akin to imposing one heavy vehicle movement every 6 minutes on a quiet residential street. This would certainly impact on the geometry of the residential street, residential amenities and the environmental character of the area.
- 3.5 As in the case of the consideration of efficiency, the safety implications have not been investigated, let alone identified. In these circumstances there can be no basis for the Committee to come to any other conclusion than Cala has not demonstrated with sufficient evidence that their proposals would satisfy Condition No.6, which was specifically imposed to ensure the Holwell route would operate with the appropriate standards for safety and efficiency.
- 3.6 It is now a long time since outline approval for the development was given. Outline approval accepts the principle of development, which should include the belief that its construction would not give rise to any unacceptable impacts. Before that decision was made, the implications of construction should have been investigated and approved. Clearly, this was not the case and the two authorities failed in this respect. It is incredible that even now, a proper assessment of the construction impacts has not been either requested by the officers or carried out by Cala, who have equally failed in this respect.
- 3.7 In the absence of a proper tracking analysis being undertaken by Cala and being made publicly available, HACT reserve the right to submit their own tracking evidence at a later date.

4.0 CONCLUSION

4.1 For the reasons stated above, it is concluded that there is a serious lack of technical evidence to justify the removal of Condition No.6, as proposed in applications 17/02778/1. In these circumstances, it is urged that the application is refused on the grounds that:

It has not been demonstrated with a sufficiency of evidence to justify the removal of Condition No.6, which seeks to protect the efficiency and safety of the proposed Holwell construction route.

4.2 Whilst no evidence is submitted separately for Application 17/02807/1, the same conclusion is reached on the basis that less improvements are proposed in that application despite the fact that the same level of potential impact would need to be accommodated.

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28th November 2017.