



Stop Bengo Quarry

Traffic and Road Safety Response

to the RJD Ltd proposal to extract sand and gravel from land at Ware Park, Bengo

Ref. PL\0776\16

Submitted by Stop Bengo Quarry

21 February 2017

1. Summary

Details of an amended scheme were submitted by RJD Ltd late in 2016. We continue to have serious concerns about the unacceptable impacts that the proposed quarry would have in highway and movement terms and the fact that they have not been addressed in the new material submitted on behalf of the applicant. Its analysis in the Transport Statement and the subsequent document Response to HCC's Highways Comments (14th November 2016) has not allayed residents' well-founded fears and is inadequate to allow County Councillors on the Development Control committee to fully assess its impact.

Our primary areas of concern are:

Information submitted with this application does not adequately describe the highway and movement impacts of the proposed scheme. It makes no reference to the concerns set out in our formal response sent to HCC on 2nd May 2016 and those expressed by many other local residents and their representatives. It simply answers questions raised by HCC Highways' Development Management engineer in her formal response submitted on 10th May 2016.

The Response to HCC's Highways Comments seems largely aimed at making the case that the scheme would not have a significant impact on congestion and safety on the wider surrounding road network in the long term. It takes no account of peaks in traffic associated with the site nor the operation of the site entrance at those busiest times. In policy terms all the attention has been focused on the final bullet point of paragraph 32 in the NPPF (in which permission should not be withheld unless residual impacts are severe) but paid insufficient attention to the point before that which requires that 'safe and suitable access to the site can be achieved for all people'.

Our primary concern is in the area of road safety. We continue to question the ability of the B158 to cope with the predicted daily average of 100 additional extra heavy lorries. Under the amended scheme the overall quantity of gravel to be dug from the pit would be reduced by about a third. While this might result in reduced landscape damage it would do nothing for traffic congestion or road safety since the rate of extraction would be unchanged.

We continue to have major concerns about the unacceptable safety hazard that would be created by the construction of the new site access junction. This is an area where none of our earlier points have been addressed. Just because it 'accords to relevant design guidance' does not mean that it could operate safely or without an unacceptable effect on congestion, especially at peak hours.

2. Highway aspects of the proposed development

The highway and movement aspects of the proposed quarry were described in the original (February 2016) Transport Statement (TS). Additional information was provided in section 4.5 Traffic of the original (March 2016) Environmental Statement (ES). Further information is provided in the subsequent Response to HCC's Highways Comments (14th November 2016).

According to para 3.2 in the TS the gravel pit would operate between 7am and 6pm on weekdays and 7am and 1pm on Saturdays. This is then qualified (in para 3.3) to state that the quarry would only operate in daylight and therefore that during 'the winter period' it would close at 4:30 pm.

HGV traffic generated by the site is described as 100 two-way trips in the TS and ES but the latter definition is qualified with word 'average'.

The site would be accessed by vehicle from a new access junction in a dip in the B158 Wadesmill Road opposite the footpath from Watermill Lane, Bengoe. This would be designed in accordance with the appropriate highway standards.

3. Traffic volume

The coverage of highway and movement aspects of the proposed quarry in the original Transport Statement is woefully short of information and analysis relating specifically to the quarrying industry. Residents know only too well how busy the B158 is, particularly in the morning rush hour. In both morning and evening peaks the A602 between the B158 junction and the A10 is congested in both directions. The presence of additional gravel lorries, made worse if Rickneys were to reopen before its December 2017 deadline, would only compound this problem as well as worsening air quality in the area.

The TS appears to have been based on a template for a more standard development, not for one involving the extraction and transport of minerals by road. A more intense examination would hopefully have given more information about lorry movements than the rather vague (and suspiciously round) figure of 50 vehicles a day with more detail on likely movements during the busiest morning peak hour.

We note that the A602 features in figure 2.4.1 of the County Council's Traffic and Transport Data Report for 2015 as one of Hertfordshire's most heavily trafficked roads. The degree of seriousness with which HCC regards the problem of congestion on the A602 is highlighted by the fact that it has an online improvement scheme in the planning stage to improve the route's capacity. That is an indication of how busy it is and how poorly it would cope with any more HGVs until it is improved. And yet the impact of the gravel lorries heading south to the site and then away to the north once loaded has not been assessed with any degree of rigour in the TS. Nor has traffic growth and development pressure on roads in the area over the 10-year duration of the proposed scheme been considered at all

The suspicion that HGV traffic generated by the quarry is likely to be greater in the morning than the evening peak hour is strengthened by the figures from the more detailed Transport Assessment for Rickneys quoted in table 5.2 of the TS. This predicts 29 trips in the morning compared with 10 in the evening. In other words, the neighbouring pit would generate nearly three times as much traffic in the morning rush as it would in the evening. We contend that a similar ratio should be applied to the Ware Park pit proposal and that if it were followed through TS paragraph 5.12 might be predicting that development traffic in the morning peak would be near if not over the critical 5% threshold usually applied when assessing the severity of the impact of additional traffic.

We also question that implicit assumption that development traffic patterns would be the same all year round. Given that there is acknowledgement that winter operations would be over a shorter day than in the summer, we would have expected this to be reflected into the trip generation and traffic modelling. No such subtlety of thinking has troubled this crude assessment.

Paragraphs 18-44 in new report are headed Traffic Impact. They state (in para 19) that 'there would be approximately six vehicles an hour or 12 two-way trips generated by the development proposal' with no more substantiation and still no recognition of the likely higher numbers in the morning rush hour. It is recognised (in paragraph 21) that the total additional HGV traffic likely to be generated by this pit and the reopening of Rickneys would represent 4.2% of all traffic. Bearing in mind that these would be 8-wheeled tipper lorries and that we believe the numbers associated with the Ware Park proposal to be significantly underestimated, it is our contention that this would be a significant proportion of morning rush hour traffic and one on which the highway authority should have identified as leading to a severe negative impact on the free and safe flow of traffic on the B158.

The highway authority only chose to draw this conclusion about the roundabout at the junction of the B158 with Anchor Lane and the A602. In order to assess this the applicant's transport consultant had traffic counts taken on 19th October 2016. We would point out that private schools in the area were on half term holiday so the data so derived are not entirely representative. The description of the modelling done to predict future flows is not easy to follow since there is confusion as to whether the future or base year is 2015, 2017 or 2021.

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The predicted flows were then 'plugged' into a computer model using TRL Arcady software. It is not clear but presumably the geometry used to set up the model was of the existing layout. We note that predicted RFC (Ratio of Flow to Capacity) values are unacceptably high on the Anchor Lane approach in the morning peak and on the Wadesmill Road approach in the evening. We would ask that the highway authority presses this point with the applicant and discusses it in its report to the DC committee.

Given that HCC now has planning permission to improve the A602, including making physical changes to this roundabout, we would regard this as committed development and would request that the future geometry as well as the resultant predicted increased traffic flows on the A602 are also tested to fully understand the impact of the proposed development.

The furthest into the future that predictions about traffic patterns in the area have been made appears to be 2017. Given the 10-year lifespan of the proposed gravel pit and the planned levels of housing and other growth in the area we would ask that the highway authority and/or Development Control committee members demand that the situation later on in the life of the development is assessed.

We are disappointed that these points have not been picked up by the County Council's highway development management engineers and ask that this matter is put directly to them and their view made known in writing to the Development Control committee.

4. Traffic safety

In our view the B158 is not safe enough to cope with an average of an extra 100 HGV movements a day. TS para 3.11 records that 85th percentile speeds on the B158 were 59.6mph in the northbound direction and 60.8 heading south. These are so near the speed limit that they imply that a significant number of vehicles being driven along this stretch of road at well in excess of the safe speed. The collision record for the road is discussed in TS paragraphs 2.6 to 2.13. This backs up the feeling of Crouchfields residents that this is an unsafe stretch of road. The map of collision locations given in TA Appendix A shows that the 13 collisions that have led to injury have all taken place in the 1.3km stretch between the Rickneys junction and the A602 roundabout – the stretch that would be used by the gravel lorries from this pit and from the Rickneys extension which has a pending permission awaiting completion of its S106 agreement.

Additional collision data is provided in the new transport report in response to a request from the highway authority. It relates to the A602 between the B158/ Anchor Lane and A10 roundabouts. No map is given (as it was in the original TS) to show where the individual at events took place. We are disappointed that this has not been picked up by the County Council's highway development management engineers and ask that this matter is put directly to them and their view made known in writing to the Development Control committee.

In our view the B158 is not safe enough to cope with the proposed new junction. Further study of the collision map shows that the collisions which have led to casualties and one death in the last 5 years are all clustered around the junctions. It would seem negligent, therefore, to introduce a new junction, let alone one in a dip in the road with curving horizontal alignment to the north.

Furthermore, there is a 7.5 T lorry ban in place to the right (south) on exit from the existing Rickneys site access road. This valuable safety and environmental protection would be compromised by the opening of a new heavy lorry access further south. No mention is made as to the need to alter this to allow the proposed Ware Park pit to operate and then how the applicant would monitor and enforce this vital movement restriction.

This choice of location of the road access point is especially hard to understand given that the HCC specification for Preferred Area 2 in its Minerals Local Plan requires that the whole area is accessed via the existing Rickneys pit access road. Given that this road could itself be used again by gravel lorries at some point in the future it would appear reckless of the DC committee to permit a new collision cluster to be created. As well as being in a dip in the road the right turn lane for the new site access junction would be nearly opposite the access to Revels Croft Farm. We understand that the

HCC Highways development management engineer has recently recommended refusal of permission because of this inter-relationship and ask that the Development Management officer team and Development Control committee take heed of this advice.

We note that the traffic information submitted by the applicant in December included a Stage 1 Safety Audit of the site access carried out for the applicant by GM traffic Consultants. It is included in Appendix I of the latest submission on traffic. Disappointingly the only issue it highlighted was the risk of overtaking collision associated with the introduction of a new access at this point. Whilst we recognise this point and welcome it being identified we are concerned that this was all that was spotted and, in particular, that no comment was made about the potential for conflict with traffic entering/leaving Revels Croft Farm. For that reason, we call into question the quality of the audit and would like to know whether HCC Highways will be signing it off by completing Appendix C 'Local Highway Authority Response' of the audit report.

Given these safety concerns we were surprised to see no mention in any of the material on traffic aspects of the development to a possible speed limit reduction on the B158.

5. Site management

Our concern is that drivers keen to win loads for their clients/ employers would arrive at or before 7am (or whatever the opening time is at that time of year) and have nowhere safe to wait. This aspect is a serious deficiency of the application. Rather than provide useful information about how the developer would manage the arrival of trucks prior to and immediately after site opening, the TS describes cycle routes and bus services in the vicinity. No reference is made to how they will be managed on a day-to-day basis other than the presence of a banksman at the main gate in paragraph 49.

We are pleased to note that 'all vehicle movements will be routed north along Wadesmill Road' (para 35) as this would remove the negative impact of development traffic on Bengoe Street. However, we are highly sceptical as to how this could be enforced, particularly in the case of staff and deliveries, and would ask that committee members seek to understand this on the behalf of residents.

Internal site operational issues are covered unconvincingly in paragraph 56 of the new report with the throwaway comment 'The applicant will ensure that the internal layout will be designed to ensure that there is no impact on the adopted public highway and it will be designed to ensure that there are no operational issues'. The applicant's transport consultant then sought to suggest that it was no business of HCC Highways how the site is managed yet has done nothing to address the questions and concerns of the Stop Bengoe Quarry campaign and others on this critical aspect. We trust that officers and elected members representing HCC as Planning Authority will take a keen interest in this area and seek answers to all our concerns.

6. Mud on road surface

An inevitable feature of all minerals extraction operations is mud on roads leading to/from the site entrance. The quality of the submission made in support of this application and the size of the site set-up proposed do not convince us that this significant environmental and safety hazard would be managed effectively. Committee members need not travel too far from Hertford to see examples of sites where this is an ongoing problem. Sites that spring to mind are those along the Lower Hatfield Road towards Essendon and Cole Green Lane on the way into Welwyn Garden City.

7. Damage to road surface and resultant safety hazard

It is our contention that in the longer term, with all these heavy lorries turning in and out of the site access, the road surface of the B158 would become dangerously rutted for cyclists and motorcyclists travelling along it. Highway degradation is addressed in paragraphs 67 and 68 of latest report.

However, there is no mention of cyclists other than (in paragraph 66) the derisory 'The proposed use will not generate a significant number of transport movements, including cyclists'. This demonstrates their lack of attention to concerns of local residents and of knowledge of the number of cyclists who use the B158 Wadesmill Road at weekends.

8. Rights of way

The other safety hazard that would be created were this scheme to be implemented involves conflicts between heavy plant and users of the Rights of Way around the site. These are addressed in the original application documents with glib words about appropriate fencing and signage. Given that this is an application for full, not outline permission, this is unacceptable.

Footpath HERTFORD 013 links the northern end of Watermill Lane with the eastern verge of the B158 opposite where the new site entrance would be built. Anyone emerging from the path and wanting to continue west would have to cross into the new site entrance and its steady flow of incoming and exiting heavy lorries. The road at that point would have been widened to create a right turn lane so pedestrians would be crossing 3 lanes with no safe designated crossing point. If the scheme were to proceed the design of the junction should be subject to a full safety audit and serious consideration would need to be given to providing a signal-controlled crossing point. This is not addressed in the new report.

One of the defining features of the site is the Right of Way that runs north-south through it. This starts at the B158 by Glenholm as Restricted Byway HERTFORD 001 and then turns into Footpath HERTFORD 001 as it rises uphill for the last 200m to St John's Wood. Comparison with the work phase areas shown on application drawing 12176/CO/1 shows that Byway 001 would cross the site haul road along which all heavy plant would pass throughout the 15-20 life span of the pit. This interaction would be created, of course, an unauthorised alteration to the description of Preferred Area 2 as envisaged by HCC. No evidence is given as to how this can be made to operate safely for that length of time or how site security and therefore public safety would be maintained during operating hours. This point is addressed weakly in new report paragraph 63.

During the course of phase 4 of the excavation the footpath and northernmost 200m or so of the byway would be diverted to the east. Insufficient details have been provided to ensure that the diverted route would be adequate, safe and properly maintained. This is not addressed in new report

Following the rather token public consultation exercise carried out by the applicant's planning consultant in November 2015 the scheme was amended to include a new 'permissive' path from Byway 001 at Glenholm, along the eastern edge of the site as far as the Rickneys Farm access for the duration of the project. While this may be of benefit to pedestrians we question the safety of crossing the site entrance which would be approximately 10m wide at that point and used by a steady stream of lorries entering and leaving the site. We note the complete absence of information in the application as to how this would be achieved and maintained.

In the additional information supplied the applicant's transport consultant suggests that it is no business of HCC Highways how the site is managed yet has done nothing to address the questions and concerns of the Stop Bengo Quarry campaign and others on this critical aspect. We trust that officers in the HCC Rights of Way team and elected members representing HCC as Planning Authority will take a keen interest in this area and seek answers to all our concerns.