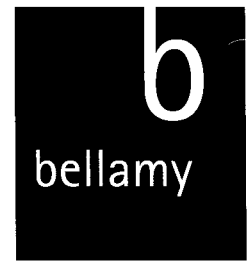


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Highway and Transportation Consultants

GDB/2665/Sum/5

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LONDON CONCRETE LTD

**LAND AT CRANFORD WAY,
FERME PARK, HORNSEY**

SUMMARY PROOF OF EVIDENCE

G D Bellamy BSc CEng MICE



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I T Roberts MIHT
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GRAHAM DAVID BELLAMY will say:-

I am a Chartered Engineer, a Member of the Institution of Civil Engineers, a Member of the Association of Municipal Engineers, with a degree of Bachelor of Science in Civil Engineering from the University of Leeds.

I am a Partner in Bellamy Roberts and I have over 35 years experience in traffic, transportation and highway engineering with consultants and in local government. The majority of my experience has been in the traffic and transportation fields, specialising in development implications, traffic management, public transport priority schemes, traffic calming, network and junction improvements. I have appeared as a witness at many public inquiries connected with development proposals, road improvement schemes, compulsory purchase orders etc.

Bellamy Roberts specialises in the traffic and transportation area, with particular emphasis on development related matters, and the practice operates throughout Great Britain and Northern Ireland, with clients from major public and private sector organisations.

1.0 INTRODUCTION

- 1.1 My evidence deals with the highway and transport issues associated with the appeal by London Concrete Ltd. My evidence takes account of matters raised by SDG and Green N8 but focuses on the Council's stated reasons for refusal.

2.0 SITE LOCATION AND PROPOSALS

- 2.1 The description, the application is for a concrete batching plant on former railway sidings at the Cranford Way Industrial Estate. This enables the development to be rail-fed so that all incoming aggregates will be supplied by rail, thereby saving very substantial road mileage compared with the alternative of delivering aggregate by heavy goods vehicle (HGV).

- 2.2 The proposal is that there will be five concrete mixer trucks based at the site distributing pre-mixed concrete to the local area. Initially, cement will be delivered in articulated tanker lorries with up to three deliveries per day, but within a relatively short timescale it is anticipated that all cement will also be delivered by rail.

3.0 FREIGHT POLICY

- 3.1 It is clear that there has been a consistent thread running through Government policy pronouncements from publication of its Transport White Paper in July 1998, in respect of encouraging the transfer of freight from road to rail in order to ease road congestion and reduce the environmental impact of freight transport by road.

3.2 Such policies are directly applicable to this appeal because the development will allow concrete to be produced for the local area around the site utilising a plant which enables all incoming aggregates to be delivered by rail. The proposals are therefore fully supported by national transport policies.

4.0 BASELINE TRAFFIC DATA

4.1 The Transport Assessment report which was submitted with the planning application was based upon traffic surveys carried out in March 2003. These surveys were repeated on Tuesday 20th September 2005. However, for reasons which I expand upon later in my evidence, it is still relevant to consider the results of the March 2003 survey.

4.2 Comparing the 12-hour count from September 2005 with the equivalent count from March 2003 there are a number of differences as detailed in Table 1 below.

Table 1
Comparison of Survey Data 2003/2005

Road	March 2003		September 2005	
	Total Flow	HGV + Bus	Total Flow	HGV + Bus
Tottenham Lane (West of Cranford Way)	6794	655	7128	394
Cranford Way	996	264	939	122

4.3 In terms of total traffic volumes, the flow along Tottenham Lane increased by 334 movements between 2003 and 2005 which is an increase of 5%. However, the number of HGV and bus movements dropped from 655 to 394, a drop of 261.

5.0 TRAFFIC GENERATION

- 5.1 The appeal site has been selected because it enables London Concrete to receive delivery of all the aggregates (including sand) by rail in accordance with their normal practice. The company envisages that this plant will consume approximately 110,000 tonnes of aggregate per annum which would otherwise give rise to 11,000 lorry movements but because of the rail connection, it will generate no traffic movements on the highway network associated with aggregate deliveries. Furthermore, those movements would be long-distance trips, from Leicestershire and Kent, so that the rail connection for aggregate supplies will save a total of circa 1,567,500 lorry miles per annum which would otherwise occur.
- 5.2 It is envisaged that there will be five mixer trucks based at the site and that each truck will normally carry an average of five loads per day. On average, therefore, the site will generate some twenty-five loads of mixed concrete for distribution into the area, which gives rise to 50 HGV movements per day.
- 5.3 Taken together with three cement deliveries per day, the total HGV generation by the company will therefore be an average of 56 movements per day.
- 5.4 In addition, a small number of customers do come to the plant to collect their own concrete. Usually these are small builders collecting a relatively small load, typically 1cum.
- 5.5 The company's records from other similar plants show that these customer collections average 2.5 loads per day. They are not normally classified as HGV movements, but for the purposes of this appeal, I have added an additional 6 HGV movements per day (i.e. 3 loads) to allow for this activity.

5.6 The total HGV activity associated with the proposed plant will therefore be 62 movements per day.

5.7 It is unlikely that the application will give rise to more than about eight employees driving to work, resulting in no more than say, 20 car movements over the day as a whole.

6.0 ROAD SAFETY

6.1 I have carried out a detailed appraisal of personal injury accidents which have occurred in the vicinity of the site during the three year period to the end of March 2005.

6.2 What can be concluded from these accidents is that none of them have occurred at the junction between Cranford Way and Tottenham Lane, none of the accidents have involved heavy goods vehicles, and none of the accidents have involved child pedestrians or child cyclists.

6.3 It is apparent that there is no particular pattern to the nature of the accidents which have occurred. That in itself suggests that there is no particular road safety problem in this area of the local network. I therefore conclude that there is no basis to suggest that the additional movements generated by the appeal proposals are likely to give rise to unacceptable road safety problems in this area.

7.0 HIGHWAY CAPACITY

7.1 During consideration of the planning application the Council requested analysis of the impact of the proposed development on junction capacity at Cranford

Way/Tottenham Lane and Church Lane/Tottenham Lane. This analysis was carried out utilising the figures collected during the September 2005 traffic surveys.

Tottenham Lane/Church Lane Junction

7.2 This is an unusual layout with a number of different turning movements taking place.

7.3 The analysis shows that there is absolutely no capacity issue at either of these junctions which currently operate with very low ratios of flow to capacity (RFC) and, effectively, no queueing. The effects of traffic generated by the proposed development will result in no material change to those circumstances.

Tottenham Lane/Cranford Way Junction

7.4 Again, it is evident that there is absolutely no capacity problem with this junction at present and the proposed development will have no material impact on that position.

8.0 ASSESSMENT OF IMPACTS

8.1 In order to set any assessment of the impact of traffic generated by the appeal proposals into its proper context, it is necessary to consider potential alternative use of the sites.

8.2 The majority of the site lies within a Defined Employment Area (DEA5) as annotated on the proposals map of the Revised Deposit Consultation Draft UDP. My understanding is that these employment areas are considered suitable for employment uses of various types, other than large freestanding offices.

- 8.3 Given the nature of the existing Cranford Way Industrial Estate and the allocation it is entirely appropriate that the appeal site could be developed for some form of commercial warehousing. Such a use would have its own traffic generation characteristics and these should form part of the background against which the appeal proposals are considered.
- 8.4 A typical warehousing development of the scale which would fit on to the appeal site, would, on average, give rise to 66 vehicle movements per day of which 38 would be by HGVs. There are a number of comments to be made about this.
- 8.5 Firstly, the total traffic flow is broadly similar to that associated with the appeal proposals. Secondly, although the number of HGVs is only about 60% of the figure for the appeal proposals it is clear that this alternative use could give rise to significant levels of HGV activity. It is also apparent that this kind of use has the potential to generate that traffic throughout the twenty-four hour period, whereas the appeal proposals are limited to the normal working day.
- 8.6 My overall conclusion, therefore, is that the development of this land in accordance with the allocations set out in the Revised Deposit Consultation Draft UDP could give rise to traffic generation characteristics which would have a generally similar impact on traffic capacity and on amenity as the appeal proposals.
- 8.7 The use of this railway land for the importation of aggregates by EWS (the rail freight operator) is permitted development, which would therefore not require planning permission. A second alternative use as an aggregates depot is therefore an appropriate consideration, and one which would be four-square with the various policy objectives of maximising the use of rail for transport of bulk materials (such as aggregates), and protecting rail-connected sites for developments taking advantage of the rail connection. This use could easily

give rise to similar or greater numbers of HGV movements as the appeal proposals.

8.8 There is a further aspect to this consideration. The September 2005 traffic survey revealed some differences, particularly in HGV flows, compared with the March 2003 survey. During the intervening period, TNT the parcel distribution operator who occupied one of the largest units on the estate in March 2003, moved out, and that unit was (and remains) vacant in September 2005.

8.9 Between March 2003 and September 2005 total daily traffic on Cranford Way declined by 57 movements, with a reduction of 142 HGV movements. The appeal site generation will amount to 82 movements of which 62 will be HGV. The addition of that to the September 2005 flows will result in a small increase in total flows (25 movements) compared with March 2003, but the HGV total of 184 movements will remain well below the level it was at in March 2003.

8.10 In my view, it is simply not possible, therefore, to argue that traffic from the appeal proposals will create a material change in the amenity of the estate, sufficient to deter existing, or potential future, occupiers. Traffic levels will, in fact, remain lighter than they were in 2003 before London Concrete became involved with the site.

The Council's First Reason for Refusal

8.11 The Council's first reason for refusal alleges that traffic generated by the appeal proposals would result in disturbance to residents on nearby roads.

8.12 I consider the actual increases in traffic flows which will result from the appeal proposals on those roads and this forms the basis of Mr Sharps' and Mr Grant's subsequent analysis. I also consider the issue of disturbance to amenity as a result of this traffic from a more general perspective.

- 8.13 It is evident that the changes in overall traffic flow are so marginal that they can have no impact on residential amenity.
- 8.14 With regard to the changes in HGV traffic flows, these vary between about 2% in the 2-way section of Tottenham Lane west of its junction with Church Lane, to an increase of 9.8% in the HGV flow along Church Lane itself.
- 8.15 Guidelines published by the Institute of Environmental Assessment and Management, indicate that further consideration of the environmental impact of traffic is not normally justified where increases in traffic flow are less than 30%, either in total flow, or when considering HGV activity alone. Even in especially sensitive circumstances changes in traffic flow of less than 10% are not sufficient to justify further consideration of environmental impacts.
- 8.16 It is also important to understand that these levels of change are identified as scoping thresholds above which it may be necessary to consider potential environmental impacts in more detail. Explicitly, they are not thresholds above which environmental harm can be anticipated.
- 8.17 In this case, all of the changes lie below the 10% threshold and therefore the guidance indicates that more detailed consideration of potential environmental impacts is not justified.
- 8.18 The greatest change in HGV content will be in Church Lane. At present, the HGVs represent some 3.5% of the overall traffic flow. As a result of the proposed development the future HGV component of the total traffic will be 3.8%.
- 8.19 It is simply not credible to argue that anybody standing at the side of the road would detect changes, either in the total volume of traffic at such low levels, or in the mix of that traffic arising out of the change of the number of HGVs.

8.20 It is for these reasons that I conclude that the changes in traffic flow arising out of the appeal proposals will have no perceptible impact on the amenity of residents in nearby roads.

The Council's Second Reason for Refusal

8.21 The Council's second reason for refusal alleges that the nature of the traffic movements generated in Cranford Way will give rise to noise and dust generation which will be detrimental to the operating and working conditions of other properties in the estate.

8.22 However, the change falls within the levels of HGV activity which existed in Cranford Way at the time of the March 2003 traffic survey. In other words, the total HGV activity in the estate as a result of the proposed development will be entirely consistent with what might be expected from an industrial estate of this nature, and that view is supported by the fact that the levels of HGV movement are less than has existed in the past.

8.23 I therefore conclude that the Council's second reason for refusal is misconceived in that it does not fully reflect the way in which this estate has operated in the very recent past, and could operate in the future, irrespective of the appeal proposals.

9.0 CONCLUSIONS

9.1 The appeal proposals are positively supported by both national and local transport policies which encourage the use of rail for the movement of bulk materials such as aggregates, and also seek to minimise unnecessary road journeys.

- 9.2 It is agreed by the Council's officers and their consultants that the development will have no material impact on the capacity of the highway network, and it will have no impact on road safety.
- 9.3 There will be no material impact on amenity for residents in nearby roads. The impact of the additional traffic generated by the proposed development will be insignificant in the context of existing traffic flows and the HGV content of those flows, such that any changes in measures of amenity will be imperceptible.
- 9.4 The development will not create a material change in the amenity of the Cranford Way estate, sufficient to deter existing or potential occupiers.
- 9.5 For the above reasons, I conclude that there is no proper basis to support the Council's first two reasons for refusal. Similarly, I also conclude that local objectors' concerns regarding the effects of the development on road safety are not well founded.