

## **Comments on WSCC's internal Highways and Traffic Report on: the impact of Application WSCC/036/20, dated 11<sup>th</sup> August 2020**

### **Update on 16<sup>th</sup> April 2021**

**Introduction:** The potential impact of the increased traffic volumes (particularly HGVs) resulting from the construction and use of this new, major (275000 +20000 tonne) waste incineration and recycling facility has been a widely cited reason by local residents for objecting to this application. There are of course many other significant reasons why this development should not be approved, but they are dealt with separately in my submitted objection.

WSCC produced an internal consultation report (August 2020) on the highways and traffic implications of the earlier, but similar application. This paper explores that report and comments on it.

**Context:** This is particularly important matter for Climping village and its surroundings because this application follows earlier approvals by WSCC (as mentioned in the WSCC report) and a number of other approvals given by Arun DC as the local planning authority, which are not mentioned. This author is aware of many recent planning applications affecting this village and they should be noted as the context in which this new application must be set as they are a material consideration to it. Those other applications that I am aware of include:-

1. The two earlier applications on this site already mentioned and which would be superseded by this much larger proposal (a doubling in size)
2. The 1500 home housing development on the adjacent Ford airfield site (still with unresolved highway and traffic issues)
3. The 300 home development proposed on the field (known as the Mulgrave devt.) at the junction of Church Lane and the A259 (also with unresolved access issues)
4. The proposal to close the Yapton Road access point for the popular Ford Market and bring all the traffic in via Ford Road (creating major local traffic implications).
5. A number of other housing developments in the Yapton area amounting to around 500 +new homes
6. A recently approved concrete crushing plant (off Yapton Road)
7. A possible crematorium facility with access from the A259
8. A number of other smaller housing developments, a possible residential care home for dementia sufferers and a holiday caravan site (all with their own highways implications.)

**It is important to note that so far none of these developments have drawn an objection from WSCC on traffic grounds and their comments have, for the most part, concerned only**

the direct access points to these sites from the adjacent highway , usually in the form of a new or improved junction)to provide access, but little else.

In every case WSCC officers conclude that the existing local road system is adequate to cope with the ever increasing volume of traffic generated by each of these proposals, and cumulatively by them all. It is this point that leads me and many others to challenge the outcome of the technical appraisal being used by WSCC to assess these applications and the conclusions being drawn from them.

**The WSCC Consultation report:** This report follows a pretty standard WSCC practice. It considers the access point to the site (off Ford Road), 'Sustainable Transport' ( walking, cycling . horse riding), the applicants' assessed trip generation and traffic modelling, personal injury accidents, and makes comments on them all. Its broad conclusions are that Ford Road and Church Lane (and their junctions) have adequate daily and peak hour capacity and that there is no objection to be made.

**Initial Comments:** there is a major flaw in this report in that it considers only numbers of vehicles ( i.e expected vehicle flows) and the theoretical traffic lane capacity of the nominated access roads ( A259, Ford Road and Church Lane). This leads them to conclude that since the total amount of peak hour traffic would be within the theoretical lane capacity it is acceptable. And no objection should be made.

But there is a major flaw in this approach as nowhere **does it concern itself with the concept of 'environmental capacity'**, which is a more complex issue. There is no direct or standard way of assessing the environmental traffic capacity of a road or lane that I am aware of, but that does not mean it can or should be ignored as it is extremely important to the local community and its environment..

'Environmental Capacity' is not a new concept and many learned papers have been written about it dating back some forty years. To explain, **Environmental Capacity is about making a qualitative evaluation of a particular road or street and its immediate environment; and then making a judgement on its suitability for the traffic loading it is carrying either now, or is likely to carry in the future.**

This type of assessment would include consideration of issues such as air quality, noise and vibration, safety matters, the immediate built and natural environment and any other matters of perception that are likely to affect the people who live in, work in or visit the area. **It is fundamentally about quality of life and sustainability.**

The environmental assessment would typically also include an analysis of the composition of the traffic using the road. For example, numbers of cyclists, pedestrians and crucially, the numbers of commercial vehicles and their size. HGVs do of course have a much greater visual impact than ordinary cars and their pcu rating ('passenger car unit') can be as much as

4 times that of a single car. They have a much greater visual impact and very much affect the 'feel' of the area through which they pass.

The WSCC report is totally silent on this and yet it is the kind of thing that is usually taken into account when assessing the need for new infrastructure such as traffic management or calming schemes and speed limits and in assessing the need for, and impact, of bypass schemes. **Environmental impact is not just about flora and fauna, it is about the impact of vehicular traffic on people and their lives, and the places they live in.**

**The traffic modelling and assessment:** The report notes that the junction modelling *'includes all consented developments and local plan allocations....and considers the cumulative impact...'*. But then draws a conclusion about only *'the junction'* which is presumably the site access point onto Ford Road, where they say the impact would not be severe.

There is no specific mention of the quantitative or safety impact on the Church Lane junction with Horsemere Green Lane, which is actually of major concern to local residents and is regarded as a genuine hazard now. This is a major omission notwithstanding the fact that it has no recorded personal injury accidents. Local people are well aware that there have been plenty of 'damage only' accidents due to the poor visibility in either direction for traffic emerging from HGL. And as traffic flows increase the situation will undoubtedly worsen. Yet this junction has been totally ignored by both the applicant and by WSCC.

**The WSCC approach and history:** The present WSCC report notes that the, *'level of trips generated (by the new development) would not result in a severe impact'* on the Church Lane/A259 junction', and also that, *'the junction is identified for improvement within the Arun Local Plan and a larger mitigation scheme has been secured.'*

This is interesting because the traffic modelling carried out for the Arun Local Plan produced a result which WSCC claimed, at the Local Plan Inquiry back in 2017, that the junction would require only a minor lane widening on one arm of this junction. Their own assessment also acknowledged that this junction, and others along the A259 are already operating at capacity during peak periods and this is borne out by the daily queues that form along the A259 in peak periods.

But **despite this** WSCC did not propose any improvements for any of these junctions as part of the development plan, not even those with known safety problems like the Oyster Catcher and Comet corner junctions. This outcome hardly instills confidence in the WSCC approach and it is only subsequently that they have reached the conclusion, pointed out at the inquiry, that all the junctions along the A259 between Wick and Flansham really do need improvement. Hence the current WSCC study into options for improving all of these junctions and the belated attempts to seek funding for them. Funding which might have come from development if they had reacted more quickly to safeguard the public interest.

**HGV numbers:** the applicant claims that number of HGV movements would be exactly the same (240 movements per day) as the earlier and smaller proposals which were approved (despite local objections). WSCC appear to have accepted this notwithstanding the fact that the new facility would have almost twice the waste handling capacity of the existing approval. And of course we cannot be sure that in future years the volumes might increase further and come from even further distances from the site. Who will monitor it effectively? WSCC?

Apparently, the developer has claimed that lorries to and from the new plant would be larger and hence total numbers of vehicles will not increase. So is using even larger lorries a benefit to the local community? And is the claim realistic anyway? Subjectively, using a simple scaling up of the change in expected waste volumes produces an operational HGV number more like 400 to 500 lorries per day (not 240) , and all using Ford Road/Church Lane as there is no other access road to the site. That would be an average of about 40 to 50 ADDITIONAL lorries per hour (two way) travelling along Ford Road/Church Lane. That would be a constant stream of just under one lorry per minute. It must be considered a huge new impact onto what is just an unclassified country lane. And yet the new application says, that this is not significant , “ given the low sensitivity of the roads.” This is an entirely different conclusion from that taken by the people who actually live in this area and use these roads on a daily basis.

**Sustainable Transport:** this is covered in the report but the conclusions are not encouraging. It claims that there are no dedicated facilities *‘within the study area’*, (so what was the study area?). It also notes that the southern part of Church Lane to the A259 is *‘part of the south coast cycle route’*. But in fact the existing road is much too narrow to provide a dedicated cycle way, or even a central island to help people crossing the road, so cyclists routinely ride on the narrow footway now, rather than risk their lives on the carriageway.

The report concludes that *‘there are limited opportunities for the development to improve pedestrian and cycle access’*. **That is not correct either and is actually another reason for objecting to the application. The Climping Parish Council have long campaigned for a widening of the single footway in Church Lane , a proper crossing point for pedestrians and cyclists (there is nothing at the moment) and a controlled junction at HGL/ Church lane to allow safe access. None of these points feature in the WSCC report even though the new levels of traffic generation will undoubtedly worsen an already poor situation.**

I would also highlight the point that this part of Church Lane is central to the character and functioning of Climping village . Church Lane contains the local 13<sup>th</sup> Century Church, has two village halls and the Climping sports field whilst also being the main access way to the local school and the well used Climping beach. In addition Ford Road is the location of Ford Prison with its own Pelican crossing in use throughout the working day, and provides access to the local railway station. None of this is mentioned in the WSCC report and yet this is the environment into which an additional 250 to 400 more very large lorries are to be

introduced on a daily basis; and I would link this omission to my earlier point on Environmental Capacity as a material consideration, which it clearly is.

**Conclusion:** The WSCC report is, in my view inadequate and disappointing because it fails to take account of many traffic impact issues that will undoubtedly adversely affect Climping village, its surroundings and the people who live and work here.

Of particular concern is the absence of any investigation whatsoever into the environmental effects on the community as I have described above. These are undoubtedly a major part of the 'traffic impact' and should be included in the analysis and its evaluation. Of the proposed energy from Waste proposals.

**A personal comment:** Unfortunately we have come to expect a 'no objection' response from WSCC highways for many years now and the community feel very let down by that, and believes that WSCC are not performing their duties in the way that they should to both recognise and defend the interests of the local community whenever major new developments are being considered. This latest WSCC report is, regrettably, a further example of that.

**Alan Lovell - MSc. C.Eng, FICE, FICHT (former WSCC County Engineer and Surveyor)**

24<sup>th</sup> August 2020\_(updated 16<sup>th</sup> April 2021)