
Note

To: Katherine Snell, Case Officer – County Planning
From: Joe Malone – Highways Development Planning
Our Reference: JM 6/3/2/MIN (77)
Copies to:
Date: 5 June 2013

Subject: **Application Reference HCC/2013/0064**
Site: Warren Heath Recycling Facility
The Welsh Drive, Eversley
Application: Permanent secondary aggregate recycling facility with landscaping

Thank you for the opportunity to comment on the above application. An Environmental Assessment was submitted to Hampshire County Council in support of a planning application for the permanent retention of a waste recycling to handle a maximum of 250,000 tonnes (t) per annum of inert construction and demolition waste at Warren Heath Recycling Centre, Welsh Drive, Bramshill. The site currently benefits from a temporary planning permission for recycling activities for up to 50,000 tonnes per annum that expires 31 December 2013.

Chapter 6 of the Environmental Statement (ES) provides an assessment of the transport impacts of the proposal, with particular regard to the capacity and safety of the surrounding network.

Traffic Generation

The applicant provides a 'first principles' estimation of the traffic volumes likely to be generated during the construction phase by the combination of construction traffic, comprising principally the importation of material to construct the proposed bund, and the ongoing recycling at the current level of operation, 50,000t per annum. The construction phase will last for 18 months and will generate 21 two-way trips per day in addition to the existing levels of recycling that will be maintained which currently generates 14 in/14 out trips per day as per figure 6.2.

A similar 'first principles' approach to the traffic generation of the operational phase is presented in Figure 6.3 with daily profiles for both phases presented in Tables 6.2 and 6.3. This phase assumes full operation of the proposed 250,000t per annum facility and will generate 68 two-way trips (68 in/68 out)

per day which is an increase of 54 trips that are currently being generated by the site which seems reasonable.

However, there appears to be a major inconsistency between this 'first principles' approach showing existing site traffic obtained by survey at the entrance to the existing which shows HGV traffic as 4 in/5 out in a single hour. This is approximately 30% of the suggested current daily trips (14 in/ 14out) as per figure 6.2. This inconsistency needs to be clarified for the existing situation and the predicted trip generation.

Trip distribution

The applicant has provided observed traffic flow diagrams in appendix 6.4 to show trip distribution of the sites current traffic. It is not clear what proportion of traffic generated by the site turns left or right onto the A327 due to the flow diagrams including a neighbouring sites (CEMEX) traffic.

Highway Infrastructure (Geometry)

The geometry of the existing Highway Infrastructure is described in paragraphs 6.40 to 6.74.

With the exception of A327/A30 Hartford Flats junction, all junctions in the study area are described as having achievable, or in excess of, 215 metres (m) visibility from a 2.4m set back.

Paragraph 6.55 states that the approximate half width of Coopers Hill is 7.8m. This is highly unlikely and should be checked and corrected, if necessary.

Highway Infrastructure (Traffic Demand)

Traffic survey data are provided in Appendix 6-3 with flow diagrams in Appendix 6-4. The traffic data has informed the selection of the peak time periods.

The method applied to extrapolate the base traffic figures (2013) to the construction year of 2015 and the future year of 2018 has been set out, with the resulting 'Baseline Traffic Flows' diagrams provided in Appendix 6-5. A spot check of these diagrams has confirmed that the growth rates have been applied as stated. Although it should be noted that paragraph 6.82 refers to the Winchester sub-region which should be corrected.

Highway Infrastructure (Capacity)

The capacity of the A327/B3016 and A327/A30 junctions has been assessed for the baseline situation in 2015 and 2018. PICADY has been used to model both junctions.

A review of the PICADY data included as Appendix 6-7 has not been possible to ensure the junctions have been modelled to appropriately to replicate

existing conditions. To ensure a complete review of each model it is essential that a scale drawing, output files, and details of any traffic assumptions, are made available for audit.

An initial desk top review of the likely geometries suggests that a number of parameters in the PICADY modelling maybe incorrect. This can be checked on receipt of the above information.

A particular issue is the A327/A30 Hartford Bridge Flats junction which is very complicated with a range of conflicting movements and is a problematic arrangement for PICADY to model. All junction modelling, especially for one as complicated as this, should be supported and validated with observed queue and delay data.

Whilst concerns remain about the appropriateness of trip generation, distribution assumptions and the accuracy of data input to the PICADY models it is not possible to reach any definitive conclusions about the impact of the proposal on the operation of the local junctions.

The effects of development are set out in paragraph 6.112 onwards. In line with the guidelines for 'Environmental Assessment of Road Traffic' the effect of the development generated traffic demand has been evaluated and it is identified that the total traffic impact would result in no more than a 5.6% increase above the base. The impact of HGV traffic is more significant, with an increase of 190% above the base on the A327 south of the junction with Welsh Drive.

Highway Infrastructure (Safety)

Personal Injury Accident (PIA) data for the five years leading to 31st October 2012 is discussed in 6.94 to 6.120.

There have been a number of accidents on the A327 between the site access and the A327/A30 Hartford Bridge Flats junction. However the report states that due to the nature of the accidents these are not related to deficient highway geometry or use of the application site, as they did not involve goods vehicles.

The accidents in the vicinity of the A327/A30 junction are more numerous, with two accidents including vehicles making the right turn movement from the A30 to the A327. It is concluded that while the *Road Safety Audit Assessment* risk assessment matrix classifies the movements from the A30 to the A327 and from the A327 to the A30 as 'High Risk', the lack of heavy goods vehicles indicates that the extended use at the site will not have a detrimental impact to the safety at this junction. While this would seem to be a reasonable conclusion, any increase in HGV flows is likely to have an impact on the existing issues with right turning movements. Therefore the existing safety concerns at this junction will need to be born in mind when considering the increase in flows resulting from the proposals. This can be assessed fully once the trip generation queries have been resolved.

Mitigation

At this stage more information is required to assess the impact of the proposed development before mitigation can be determined. However, even at this stage the proposals seems to result in the generation of a further 54 two way (108 total) HGV trips on the local highway network per day. Should the development be permitted it will be necessary that a Transport Contribution is secured in line with Hampshire County Council's Transport Contribution Policy to make the development acceptable in planning terms.

Conclusion

Whilst the Transport Assessment concludes that the highway network will continue to operate at broadly the same level compare to the baseline scenario, and that there would be no material or significant worsening of highway safety risks as a result of the proposed development, the Highway Authority will be unable to reach a similar conclusion until the disparity between the increases in operational capacity and traffic generation have been clarified by the applicant, and apparent errors in PICADY modelling have been corrected.

Recommendation

I am unable provide a positive recommendation until further information has been submitted to my satisfaction on the following matters:

- The discrepancy between existing, proposed peak hour and daily HGV movements;
- The concerns raised with the modelling inputs;
- A Transport Contribution has been agreed

I may be able to provide a positive recommendation on receiving this information but if you are minded to determine the application in absence of this, I would request that the application is refused for the following reasons:

1. *In the opinion of the Planning Authority the proposal involves development that cannot be reconciled with the National Planning Policy Framework in that the significant movements generated could not be accommodated adequately on the existing transport network. This would result in a severe impact on the road safety and operation of the local transport network contrary to the NPPF and Minerals and Waste Policy DC6*

Should you wish to discuss this further please do not hesitate to contact Joe Malone on 01962 813863.