

Transport Assessment

Validity of the Transport Assessment.

The Application Document- ES App 7 Traffic Statement consists of a Transport Assessment by David Tucker Associates. This is as part of the Environmental Impacts of the proposed development.

The assessment considers the expected level of lorry movements to be generated by these activities and assesses the impact on the local highway network.

It would also be appropriate to also consider the impact on Air Quality and Noise as well. (Suggested in the Scoping Opinion)

This report has numerous omissions and questionable data (detailed below) which renders it invalid.

HGV Routing

The Traffic Statement states:

3.4.1 Coal extraction vehicles (20 tonne HGVs) will be routed by turning right out of the site, south along the A61 until the Tesco roundabout. They will then turn towards Tesco then turn left and follow Market Street to a T Junction and turn left out of Clay Cross, along the A6175 towards the M1. HGV movements to the site will follow the same route in reverse order.

Thus, to fully assess the impact of the proposed development the Traffic Assessment should consider the effects not only on the A61 but also on the A6175.

The assessment of effects on the A6175 is stated as “based on surveys for the Biwater site”. It is stated flows are similar to the A61. This is very superficial.

Traffic Generation

The Traffic Statement gives the following information about HGV Movements:

4.1.7 Assuming a 20 working day month, this equates to an average of 12 loads (24 movements) per day. The above calculation is based on average movements and therefore by definition some days may experience higher levels of movements (and therefore also some lower).

4.1.8 For the purposes of a robust assessment, a peak of 20 loads (40 movements) has been assessed.

But note

Section 3.3.1 refers to the haul roads within the site being constructed of aggregate material. (ES App 4 Air Quality Assessment 5.3.2.2 also states this + internal haul roads + processing area all aggregate surfaced)

However

Section 4.1 Traffic generation makes no mention of vehicles coming to the site to deliver the required aggregate.

This section is therefore both incomplete and inaccurate and hence the Traffic Assessment is totally inaccurate.

HGV Percentage Increase

Their Traffic Statement states:

2.3 Adjacent Highway Network

2.3.1 In order to establish existing flows and vehicle speeds on the A61 an Automatic Traffic Count (ATC) was undertaken on behalf of DTA by the Paul Castle Consultancy (PCC).

2.3.2 "The surveys show an existing combined HGV flow in the region of 10% over the day which equates to around 1,400 movements per day."

The Government Department for Transport figures (2012) for this point on the A61 (census point ID 16583) show the Average Daily Flow for HGVs to be 418 out of a total for all vehicles of 15153 (that is 2.75%). Hence an extra 40 per day is $40/418$ is approximately a 10% increase.

Thus 40 movements per day is a 10% increase in HGV movements – this is not unsubstantial!

Again

The Government Department for Transport figures (2012) for the A6175 at North Wingfield (census point ID 77286) show the Average Daily Flow for HGVs to be 408 out of a total for all vehicles of 10277 (that is 4%). Hence an extra 40 per day is $40/408$ is approximately a 10% increase.

Thus 40 movements per day is a 10% increase on the A6175– again this is not unsubstantial!

Cumulative Impact

The Transport Assessment says:

4.3 Traffic Impact – Cumulative

4.3.1 Cumulatively, the site could be operational at the same time as a number of local developments; including the Bi-water development site (now called the St Modwen Development) and the development of the Avenue Coking Works site.

4.3.2 “The overall traffic generation of the Bi-water site, as per the consented scheme is attached at Appendix F”

Appendix F is a Maximus document supposedly summarising figures in 2006 with no explanation of figure on the diagram or where the came from.

This is not an acceptable accompanying document.

The Transport Assessment also says:

4.3.3 Appendix F of the Transport Assessment for the Avenue Works site confirms that changes on this section of the A61 will be modest and the level of change (less than 3%) in the peak hours would not materially alter the above assessment.

There is no accompanying document to support this.

Also

In the Transport Assessment it states:

4.3.4 There is also an expected planning application for an Energy from Waste site on Bridge Street, Clay Cross. This is expected to generate around 84,000 tonnes per annum of HGV movements, which equates to around 15 HGV movements per day

But

The submitted Air Quality Assessment states:

A scoping opinion for a proposed energy from waste (EfW) facility located at Plot 20, Bridge Street, Clay Cross has been reviewed. The proposals involve the importation of approximately 80,000 tonnes per annum of residual construction and demolition wood waste for treatment by gasification in order to generate up to 12 MW of electricity and 4 MW of thermal energy. It is expected that no more than 60 HGV movements per day will be generated. The scoping opinion suggests that the HGVs would be routed along the A61. As a worst case the combined increase in HGVs from the EfW and Hilltop schemes would result in an additional 100 movements per day along a short stretch of the A61 between the Hilltop site entrance and the A6175.

It doesn't seem consistency is of paramount importance in these assessments!

(It should be noted that in the Application for an Energy Recovery Facility on 10/12/14 CW4/1114/98 it is stated that a figure of 60 HGV movements a day is the correct one)

The St Modwens development (formerly known as the Biwater Scheme) located on the opposite side of the A61 from the Hilltop scheme is now in progress with around 1000 homes planned together with a pub, discount food store, fast food restaurant and a hotel. There will be space allocated for offices warehousing etc.

It is very difficult at this stage to accurately calculate traffic implications on the A61 (and/or the A6175) but just working on the civil engineering "rule of thumb" that it takes 10 lorry loads to build a house (20 movements) [this is on a prepared site –disregarding all the initial site preparation, infrastructure etc] That is 20000 lorry movements for the houses alone!

If we assume a similar figure for infrastructure etc this gives us around 40 lorry movements per day.

Thus cumulatively we could be getting an increase of 140 lorry movements a day which is around a **33% increase**

Hence we see there will be a huge cumulative impact on the A61.

Thus the Cumulative Traffic Impact in this assessment must be considered invalid.

There is no assessment of the Impact on Air Quality and Noise generated by the road traffic generated as a consequence of operations on the site as stated in the Scoping Opinion.

As a result of the many omissions, errors and incompleteness of the Traffic Assessment we argue this it is not valid.

We would also argue that bearing in mind traffic impacts on the A61 and surrounding area that this project (a non-regeneration project providing no benefits to the surrounding community) should not be approved when true regeneration projects are in progress.

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