

Doc #1 TRAFFIC AND ITS IMPLICATIONS

Additional comment and analysis to support letter of objection 11th April 2021/J Passingham

There should be no doubt that this development will bring a significant amount of traffic into Maple Cross. The impact of this will be to increase levels of local pollution, to increase traffic noise by a material amount (currently proposed to be on a 24/7 basis) and to place schoolchildren at risk.

The Council Planning Department may argue either that this issue has been dealt with in the 'first round' of this planning application, or that the issue of traffic is a matter for Herts County Council (HCC). However, the Local Residents believe that it is the duty of Three Rivers District Council to place itself at the centre of this topic in order to ensure safe road design within Maple Cross as anticipated in the Department of Transport Publication 'Strategic Framework for Road Safety' ²⁰¹¹ and in the ROSPA (Royal Society for the Prevention of Accidents) document 'Road Safety: A Guide for Local Councillors in England' ^{May 2013}. This second document makes the following statement: *"Where a local authority is the local planning authority, it is responsible for regulating and controlling new developments in its boundaries. Officers and councillors decide whether or not proposals for new developments are acceptable...This presents opportunities to anticipate and avoid potential road hazards, and to make walking, cycling and the road environment safer at the design stage...It prevents problems before they arise, ensures that new road safety risks are not created..."* TRDC should actively evaluate and discuss this topic within their planning deliberations due to these clear obligations, and should not simply delegate this matter to HCC.

RATIONALE FOR TRDC RE-CONSIDERING THE TOPIC OF TRAFFIC

In addition to this, there are a number of changes emerging, and errors made in previous assessments which we believe should be properly and actively researched, validated and considered by TRDC and its Planning Department in the assessment of whether the traffic streams are now acceptable, or not, namely;

The Traffic from the hotel (7/1401/FUL) is not included. A material amount of extra traffic originating from the hotel on the boundary road for which Planning Permission has been granted by TRDC and where some work has already started. The Maple Cross Hotel appears to have 373 parking spaces allocated and 207 bedrooms which is a significant number. Assessment of this traffic appears to have been omitted from this assessment and the developer confirms this in their submission. (Source BWB report clause 6.11). As the traffic is material, this omission is extremely unfortunate. There are some assumptions made about the level of this traffic in this report, but TRDC should properly request a traffic plan for this site and consider this within the context of the proposed warehouse development. This incremental traffic will place Schoolchildren at material accident risk, an argument that is further summarised in this document. This incremental traffic will introduce an unacceptable level of traffic generated pollution and noise into this residential area.

There are other important omissions from the traffic assessments, to the extent where there is significant local concern about the way in which these assessments have been made. They do not appear to be sufficiently rigorous to represent what is and will happen in this area. There has been a failure to include Hertford Place in the traffic estimates. This is a major oversight which needs urgent attention. This office block is sizeable and has the potential to generate significant traffic around this junction. The site opposite the hotel planning site (bulk transfer) has been excluded, despite the fact that we know there are 90 HGV licences granted to this site. The issue of higher traffic to Woodoaks farm has been excluded and downplayed. Since covid, many people has been walking around Woodoaks farm for respite and recreation – but this new and positive traffic generator has not been included at all. Local people are keen to support the environmental and recreational activities at Woodoaks – but this is totally ignored.

There has been a material change in the amount of HGV traffic passing down the boundary road. Residents have intelligence on current traffic levels but would suggest that TRDC formally asks Thames Water to summarise the current and future level of this traffic in order that it can be taken properly into consideration within the warehouse evaluation. Residents are of the view that this incremental traffic will place Schoolchildren at material accident risk, an argument that is further summarised in this document. Residents are also of the view that this incremental traffic will introduce an unacceptable level of traffic generated pollution into this residential area. We can also anticipate interruption to HGV's transporting sewerage. There has been

insufficient attention given to the topic of access to the boundary road for sewerage carrying HGV's to the sewerage works whilst boundary road work is underway. There could be significant delays to sewerage carrying HGV's when the warehouse complex/hotel are fully operational. This not evaluated in any plan on the planning website as far as we can ascertain. As the site is safeguarded and the downsides are obvious and material, this is an important oversight.

The previous Planning case failed to deal with the problem of high numbers of vehicles travelling down Maple Lodge Close, claiming that this would 'not be permitted'. This is a highly unsatisfactory response to what could be a very serious risk to Pedestrians. This issue is explained further later in this document.

There also seems to be a real failure to consider the safety aspects of HGV vehicles – especially around children and cyclists. This is an important oversight and an area that other Councils are actively tackling. It would not be unreasonable to expect that TRDC should actively address this topic with respect to new developments that involve large numbers of HGV's in the interests of protecting its residents and safeguarding them from harm.

There is a material amount of HS2 traffic travelling down the A412. Whilst the council could say that these vehicles are not permitted to use this road, ***the fact remains that they are using the road in large numbers***. This cannot be ignored as it represents the daily lived experience of Maple Cross and West Hyde Residents rather than a modeled or theoretical exercise. We strongly suggest that TRDC undertakes a traffic counting exercise to evaluate the additional impact of this recent change, in order to assess the position with respect to the warehouse development. The Residents are of the view that this incremental traffic will place Schoolchildren at material accident risk, an argument that is further summarised in this document. The Residents are of the view that this incremental traffic will introduce an unacceptable level of traffic generated pollution into what is primarily a residential area.

It does not appear that TRDC has considered the impact of upcoming developments within the area within the framework of the warehouse traffic plan. Given the fact that the consultation is just about to be published, this should be actively taken into consideration as it will impact safety and pollution levels locally.

The previous exercise did not consider the impact of noise to those enjoying Springwell lake (amenity) and to residents living on the other side of Springwell lake, who are highly susceptible to vehicle noise from this area with documented existing grievances against HGV noise in this area – an apparent oversight on the part of TRDC.

Covid has resulted in larger numbers of people working from home, and so the daytime domestic environment is far more important. This is a new point also dealt with in document 2.

There is surely an obligation on the part of TRDC to anticipate emerging policies and directives which they will be obliged to follow, in respect of reviewing planning cases. We believe that TRDC should not put the district into a situation where it cannot meet various Government targets and objectives through poor decision making at this stage, which could then involve local taxpayers in funding financial penalties. It is very clear that the Government will set legally binding targets in a number of areas. For example, the Government is set to publish targeted reductions in the next 2 years for five of the most damaging air pollutants, namely fine particulate matter (PM_{2.5}), ammonia (NH₃), nitrogen oxides (NO_x), sulphur dioxide (SO₂), and non-methane volatile organic compounds (NMVOCs).

In order to meet these targets, TRDC may consider the introduction of a 'green traffic zone' as many councils are now doing. The decision to allow a polluting activity into the residential area of Maple Cross may prevent TRDC from introducing positive environmental policies as it had either not thought through the relevant implications, OR proposed measures and mitigations to deal with these (for example, only allowing the warehouse developer to use green vehicles at this site, not permitting the developer to operate 24/7 to reduce traffic emissions etc)

Turning now to some of the specifics around traffic and their implications within the area;

WHAT LEVEL OF TRAFFIC WILL THIS DEVELOPMENT INTRODUCE? DATA AND DEFINITIONS

The developer notes in the various submissions that there will be principally two types of vehicles entering the site, apart from staff cars, bicycles etc. These are described as HGV's and LV's. As there is no formal classification for LV's, we believe these could be either vans or more substantial vehicles. There the definitions could be as follows;

HGV = Heavy Goods Vehicle. Government Dept of Transport defines HGV as lorries between 3.5-7.5 maximum gross weight (tonnes) with 2 axles, and over 7.5 tonnes, up to and in excess of 6 axles with a weight of 44 tonnes or more.

LGV = Light goods Vehicle. Government Dept of Transport defines LGV as having 2 axles and weighing up to 3.5 tonnes, with no side windows.

The issue of definition is important as 96% of vans are powered by diesel.¹ We believe this issue has not been properly assessed in the traffic impact assessment of this development and within the local pollution assessment. As a reminder to TRDC in respect of Toxic Compounds in Diesel Exhaust, the principal toxic gas compounds found in diesel exhaust include carbon monoxide (CO), nitric oxide (NO), nitrogen dioxide (NO₂), and sulfur dioxide (SO₂). Biological activity and toxic characteristics of these compounds have been studied for years and are relatively well understood. In recent years, emission of diesel particulate matter (PM or DPM) has become one of the major health concerns among all diesel emissions². We would add that on the issue of higher levels of particulate matter, Diesel engines produce higher levels of particulates, microscopic bits of soot left over from the combustion process. These can penetrate deep into the lungs, causing irritation and potentially triggering asthma attacks³. Two years after the Dieselgate scandal exposed the dirty nature of diesel cars, a new study by Transport & Environment (T&E) shows that diesel cars not only pollute the air but also emit more climate-change emissions (CO₂) than petrol cars. A lifecycle analysis of vehicle emissions proves that diesel cars over their lifetime emit 3.65 tonnes of CO₂ more than a petrol equivalent⁴.

If the transport and pollution emission assessments do not properly take the characteristics of the vehicles into consideration, this merits further assessment on the part of the TRDC Planning Department, particularly given the high numbers of diesel vans that will be entering and leaving the site.

¹ SOURCE = Dept of Transport Van statistics 2019-2020 issued 20 Sep 2020

² SOURCE – Diesel Net Technology Guide

³ SOURCE - By Theo Leggett Business correspondent BBC News Published 21 January 2018

⁴ SOURCE – transportenvironment.org

It is obviously important that discussions about levels of traffic are accurate and transparent to residents. In order to validate our understanding of the traffic data put forward by the warehouse developers we sought advice from Claire Westwood at the TRDC Planning Department as follows;

Email to Planning department

From: [REDACTED]
Sent: 19 March 2021 09:44
To: [REDACTED] <[\[REDACTED\]@threeivers.gov.uk](mailto:[REDACTED]@threeivers.gov.uk)>
Subject: 21/0573/FUL- vehicles in and out of the site (excluding staff)
Dear [REDACTED],
Following our telephone conversation - this is what I am talking about.
This is a table at the back of the Cole Jarman report (page 16 or thereabouts) called Planning Noise Assessment 19/033/R2. This report description seems to indicate that each 'count' in the report represents both an ingress and egress of a vehicle. And so it represents the entirety of a vehicle interaction with the warehouse site - both the journey in and the journey out. For example, between 0000-0100 there will be 6 HGV's going into the warehouse site of which 3 HGV's will visit unit 1 and 3 HGV's will visit unit 2 and they will then leave the site.
If we counted the ingress and egress of the HGV's as distinct and separate vehicle movements from each other, then we would have to multiply the whole of this table by 2.
And so that would indicate, for example, 12 HGV 'trips/distinct vehicle movements between 0000-0100 made by these 6 HGV's. Can you tell me whether my assumption is correct.
Thanks very much - greatly appreciated. Judith

Reply from Planning department

On 30 Mar 2021, at 08:26, [REDACTED] <[\[REDACTED\]@threeivers.gov.uk](mailto:[REDACTED]@threeivers.gov.uk)> wrote:

Dear [REDACTED], Further to your query, please see below response from the agent which I hope is of assistance/clarifies. Kind Regards. [REDACTED]

As set out at the bottom of page 17 of the Planning Noise Assessment, the numbers within the Predicted Traffic Flows table are 2 way movements (i.e. one entrance and one exit). Both the in and out activities are included within the noise calculations and so the predicted traffic flow numbers have been doubled.

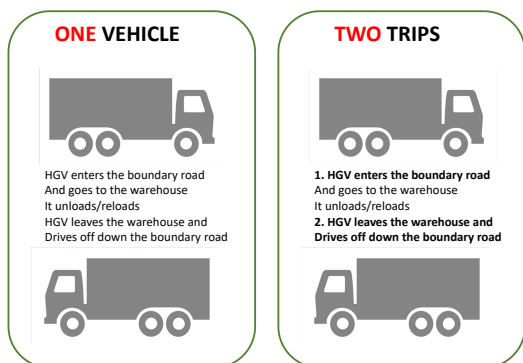
The table below has been prepared to compare the assessment methodology against the resident's recommended methodology, in an attempt to explain that the noise assessment has taken into account double the numbers within the Predicted Traffic Flows table:

Scenario	Traffic Flow Numbers (HGVs to both units, 0000-0100)	"Movement" Composition	Total "in + out" activities in resulting noise calculations
Planning Noise Assessment	6 movements (combining in and out activities)	6 in activities 6 out activities	12
Resident Query	12 movements (considering in and out activities separately)	6 in activities 6 out activities	12

As you can see, the resulting total "in + out" figure is the same, it is just the traffic flow numbers have been presented differently.

For reference, the factors that are taken into account in the "in and out" activities are set out in Schedule SCH2 in the Cole Jarman Planning Noise Assessment (19/0333/R2-1). As set out above, the footnote to the table Schedule SCH1 notes that the figures are 2-way movements include in and out activity.

This confirmation from the TRDC Planning Department and from the developer's consultant is essential, as it forms an accurate basis from which we can then go on to summarise the potential impacts of the various traffic flow omissions in order to illustrate the scale of the issues we are discussing here. Each vehicle visiting the site is generating two trips – one into the site, and one out of the site.



And so based on the confirmation from TRDC, we can construct both a vehicle and a trip assessment which is shown in Table 1 below. In terms of the actual numbers of vehicles entering and leaving the site, this is as follows;

TABLE 1 – TRAFFIC and TRIPS for the warehouse development/s.

Predicted Traffic Flows for 2 warehouses by hour of day based on vehicles and trips

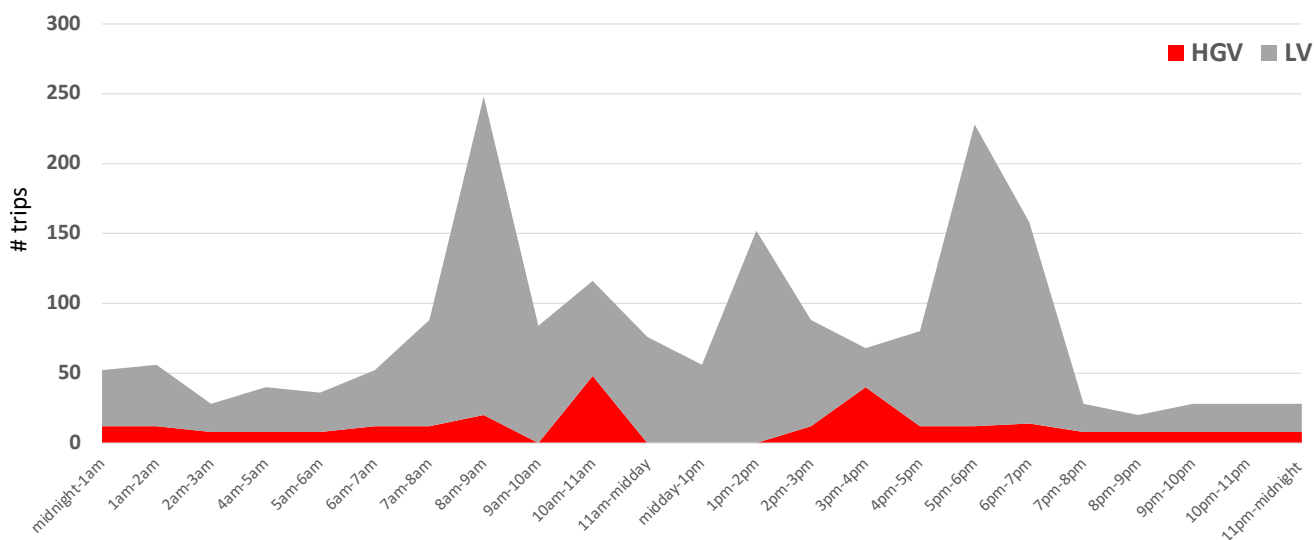
	DAILY VEHICLE NUMBERS			DAILY VEHICLE TRIPS			WEEKLY VEHICLE NUMBERS			WEEKLY VEHICLE TRIPS			ANNUAL VEHICLE NUMBERS			ANNUAL VEHICLE TRIPS		
Hourly segments	HGVs visiting site	LGV's and LV's visiting site	TOTAL HGV's + LGV's, LV's	HGVs visiting site	LGV's and LV's visiting site	TOTAL HGV's + LGV's, LV's	HGVs visiting site	LGV's and LV's visiting site	TOTAL HGV's + LGV's, LV's	HGVs visiting site	LGV's and LV's visiting site	TOTAL HGV's + LGV's, LV's	HGVs visiting site	LGV's and LV's visiting site	TOTAL HGV's + LGV's, LV's	HGVs visiting site	LGV's and LV's visiting site	TOTAL HGV's + LGV's, LV's
midnight-1am	6	20	26	12	40	52	42	140	182	84	280	364	2184	7280	9464	4368	14560	18928
1am-2am	6	22	28	12	44	56	42	154	196	84	308	392	2184	8008	10192	4368	16016	20384
2am-3am	4	10	14	8	20	28	28	70	98	56	140	196	1456	3640	5096	2912	7280	10192
3am-4am	6	20	26	12	40	52	42	140	182	84	280	364	2184	7280	9464	4368	14560	18928
4am-5am	4	16	20	8	32	40	28	112	140	56	224	280	1456	5824	7280	2912	11648	14560
5am-6am	4	14	18	8	28	36	28	98	126	56	196	252	1456	5096	6552	2912	10192	13104
6am-7am	6	20	26	12	40	52	42	140	182	84	280	364	2184	7280	9464	4368	14560	18928
7am-8am	6	38	44	12	76	88	42	266	308	84	532	616	2184	13832	16016	4368	27664	32032
8am-9am	10	114	124	20	228	248	70	798	868	140	1596	1736	3640	41496	45136	7280	82992	90272
9am-10am	0	42	42	0	84	84	0	294	294	0	588	588	0	15288	15288	0	30576	30576
10am-11am	24	34	58	48	68	116	168	238	406	336	476	812	8736	12376	21112	17472	24752	42224
11am-midday	0	38	38	0	76	76	0	266	266	0	532	532	0	13832	13832	0	27664	27664
midday-1pm	0	28	28	0	56	56	0	196	196	0	392	392	0	10192	10192	0	20384	20384
1pm-2pm	0	76	76	0	152	152	0	532	532	0	1064	1064	0	27664	27664	0	55328	55328
2pm-3pm	6	38	44	12	76	88	42	266	308	84	532	616	2184	13832	16016	4368	27664	32032
3pm-4pm	20	14	34	40	28	68	140	98	238	280	196	476	7280	5096	12376	14560	10192	24752
4pm-5pm	6	34	40	12	68	80	42	238	280	84	476	560	2184	12376	14560	4368	24752	29120
5pm-6pm	6	108	114	12	216	228	42	756	798	84	1512	1596	2184	39312	41496	4368	78624	82992
6pm-7pm	7	72	79	14	144	158	49	504	553	98	1008	1106	2548	26208	28756	5096	52416	57512
7pm-8pm	4	10	14	8	20	28	28	70	98	56	140	196	1456	3640	5096	2912	7280	10192
8pm-9pm	4	6	10	8	12	20	28	42	70	56	84	140	1456	2184	3640	2912	4368	7280
9pm-10pm	4	10	14	8	20	28	28	70	98	56	140	196	1456	3640	5096	2912	7280	10192
10pm-11pm	4	10	14	8	20	28	28	70	98	56	140	196	1456	3640	5096	2912	7280	10192
11pm-midnight	4	10	14	8	20	28	28	70	98	56	140	196	1456	3640	5096	2912	7280	10192
Total x vehicle type	141	804	945	282	1608	1890	987	5628	6615	1974	11256	13230	51324	292656	343980	102648	4368	687960

These data have been derived by taking the Planning Noise Assessment Report 19/0333/R2 presented by Cole Jarman in the TRDC Planning website and summarising the data shown in the appendix on predicted traffic flows. The data firstly show the number of HGV's and then the number of LV's (and/or LGV's) visiting the site by hour of the day. This then tells us that the plan is for 141 HGVs to visit each day and 804 LV's/LGV's to visit each day, making a total of 945 vehicular visits each day. A visit means that the vehicle is going into and then coming out of the site and will be counted once in this data set. In order to illustrate the impact to residents and on local roads, we have multiplied this data by 2. This then gives us a perspective on the numbers of HGV trips and the number of LV/LVG trips each hour and each day, which is the measure that will most affect residents. For the daily perspective, this table then tells us that there will be 1,890 distinct and separate trips in and out of the warehouse every day of the week. This rises to 6,615 vehicles per week or 13,230 trips per week, and a staggering 343,980 vehicles annually or 687,960 vehicular 'trips' in and out of the warehouse/s every year.

By reviewing this data graphically we can start to build up a picture of the profile of traffic generated by the proposed warehouse complex development as shown on Table 2. This shows ‘trips’ as representing the measure that will most impact residents. This means that a vehicle is counted twice – once when it goes into and once when it comes out of the site. This is because each of these events will distinctly and separately impact traffic at the junctions, and will impact noise and pollution levels.

TABLE 2 below then shows the daily data in graphic form.

Predicted DAILY Traffic Flows by hour of day (excluding staff) based on trips



This chart shows the number of HGV and LV TRIPS by hour of operation. One HGV going into the site and going out is counted twice – each time it makes a trip (a trip into the site and a trip out of the site) SOURCE – Cole Jarman Report page 16 (Planning Noise Assessment)

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Specifically, we would draw the attention of the Planning Committee and Local Councillors to the significant and ‘never off’ nature of the all-night traffic, for example, 52 trips between midnight and 1am and then 56 trips between 1am-2am. We would also draw the attention of the Planning Committee and Local Councillors to the ‘peak trip traffic events’ which tend to take place at the same time as children travel to school in the morning and then travel home at night. This topic is explored in more detail later on but is of substantial concern to the residents.

MAPLE LODGE CLOSE

The issue of how this substantial volume of traffic will impact Maple Lodge Close is also of serious concern to local residents. Whilst HGVs are not allowed to travel down Maple Lodge Close, other vehicles are, and there is nothing to practically stop them from doing so. General statements of the sort ‘*that this will not be permitted*’ and ‘*this road is not part of the public highway and so there is nothing we can do about it..*’ are absolutely not sufficient to guarantee the safety of families, schoolchildren, domestic pets from traffic and pollution and noise generated by this heightened traffic, most likely in the form of diesel vans as discussed earlier in this document.

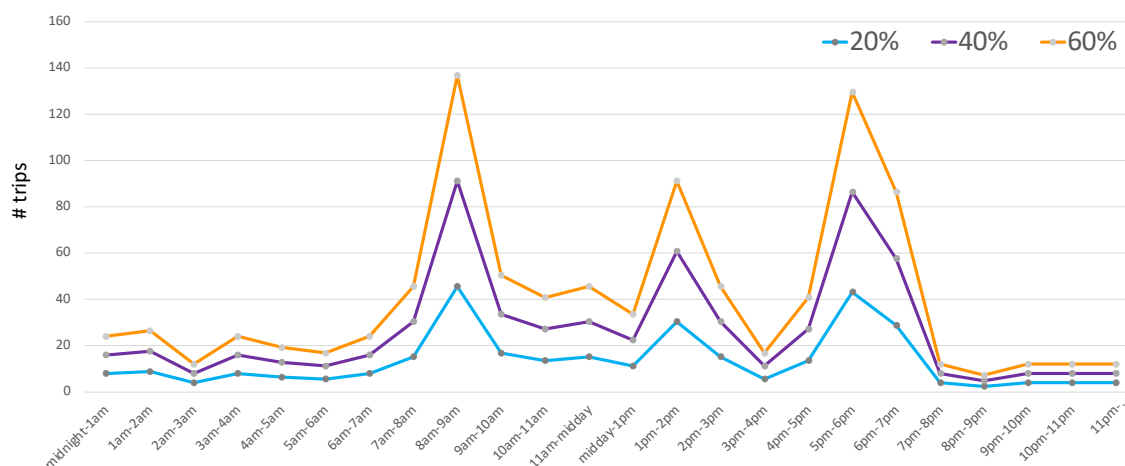
LV’s/LGV’s will be incentivised to travel down Maple Lodge Close if they are travelling back in the Heathrow direction to cut through and save time. They may also seek to avoid HGV traffic at the other exit. The traffic peaks at the warehouses tend to coincide with peak times when children will also be crossing these roads on the way to school as flagged previously. Signs will not be sufficient of a deterrence to stop reasonable numbers of LV’s/LGV’s driving down Maple Lodge Close.

In order to discuss this topic further, the following slide shows the impact assuming that each of 20%, 40% and 60% of LV’s/ LGV’s travel down Maple Lodge Close. Again, this chart is based on trips.

TABLE 3 – Scenarios Showing Traffic in Maple Lodge Close

Incremental LV/LGV traffic in Maple Lodge Close on a daily basis

If 20%, 40% and 60% of LV/LGV warehouse traffic travels down this road.



This chart shows the number of LV/LGV TRIPS by hour of operation. One vehicle going into the site and going out is counted twice – each time it drives down Maple Lodge Close SOURCE – Cole Jarman Report page 16 (Planning Noise Assessment)

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This chart takes all of the LV/LGV specific visits to the warehouse sites (**not** the HGV visits) and then illustrates the impact if just 20% of trips take place using Maple Lodge Close to access or leave the warehouse sites, then for 40% of trips, and finally for 60% of trips showing with the orange line in the graph. This shows numbers of trips on a daily basis. As we know that there are 1,608 LV/LGV trips every day, 20% would result in a Maple Lodge close ‘trip count’ of 322, 40% would result in 643 and 60% would result in an enormous 965 trips down Maple Lodge Close in every 24-hour period.

The following photographs give an indication of the actual conditions on this road. Maple Lodge Close is a quiet residential road, narrow, with many parked cars. Residential housing is on all sides of this road. Children play in the street and domestic pets cross over on a frequent basis.

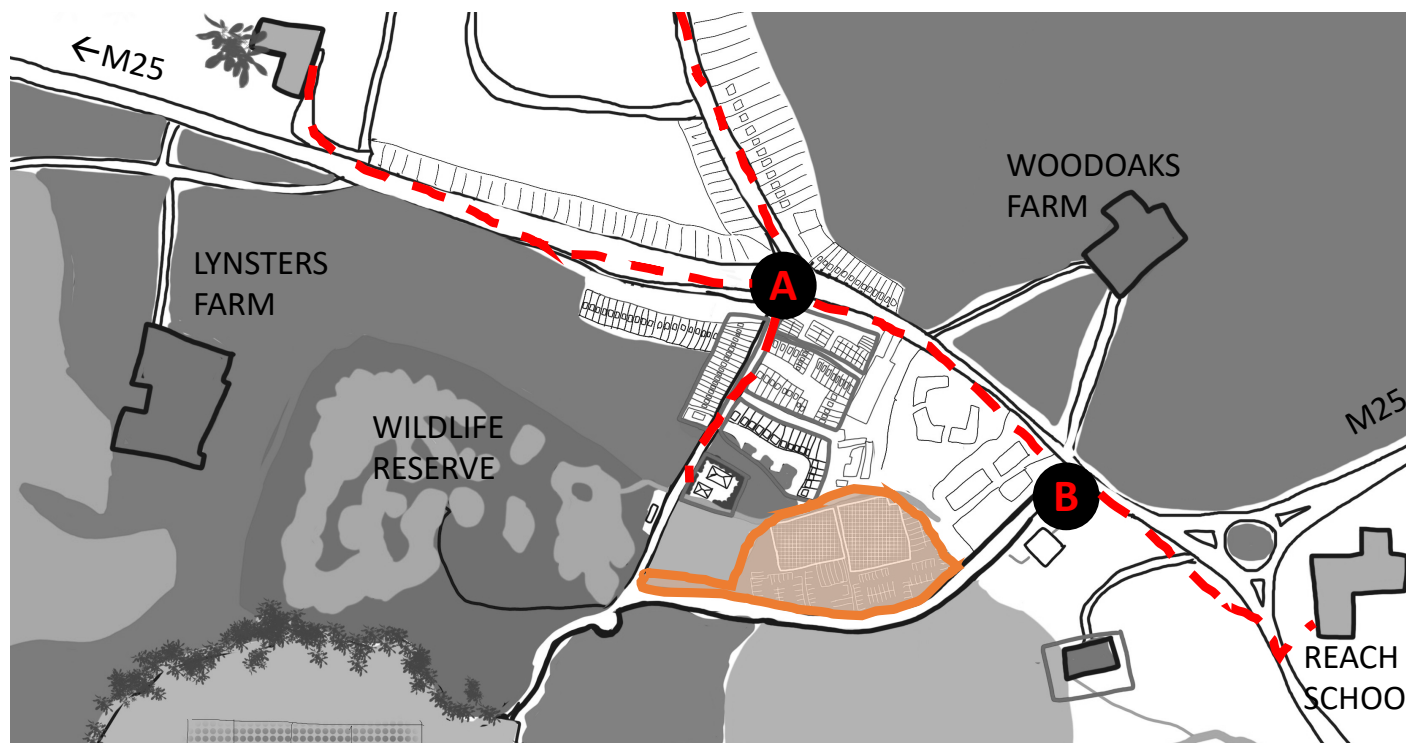
MAPLE LODGE CLOSE – examples



TRAFFIC AND SCHOOLCHILDREN

If we then consider the implications of this proposed introduction of industrial traffic on children going to school, firstly in terms of Maple Lodge Close/the junction between Maple Lodge Close and the A412. The following schematic Table 4 shows the various sites and locations of relevance and is drawn to scale. On the top left of the slide is the JMI School. We know that around 200 children attend this site, the majority from Maple Cross and that they are tending to walk to and from school, some of which will be across these junctions. Some children will travel from the Mill End area therefore crossing Junction B and Junction A. We know that there are around 76 children from Maple Cross (out of a total of around 670) who attend the Reach Free School, which will increase by about +20% over the next 3-5 years and so those walking to the Reach Free could increase to c 91 children.

TABLE 4 – TRAFFIC and schoolchildren



The red lines on this chart show the key routes for children walking in this area to the two main schools. 'A' represents the Maple Lodge Close/A412 junction and 'B' represents the boundary road/A412 junction. The site for the two warehouses is shown in brown.

Junction A

If we first take 'A' and consider the various incremental traffic estimates derived from lower and higher proportions of LV's and LGV's travelling down Maple Lodge Close at school hours. We have taken 8-9am and 4-6pm as school hours for these purposes, allowing for school clubs and other activities after school. If we first take our example where of 40% of LV's/LGV's travel down Maple Lodge Close this would generate 91 incremental LV/LGV trips in Maple Cross Close between 8-9am, and 114 incremental trips between 4-6pm. The morning traffic increase represents 1.5 incremental LV/LGV's per minute and in the after-school period, an incremental 1 LV/LGV per minute. If we take the higher 60% assumption, this then increases to 137 incremental LV/LGV's in Maple Lodge Close in the morning and 170 incremental LV/LGV's in the 4-6pm period. This would represent an incremental 2.3 LV/LVG's per minute in the morning and an incremental 1.42 LV/LGV's per minute in the afternoon period. All of this activity in Maple Lodge Close.

We believe that TRDC (and HCC) should be very concerned indeed about this topic. A study of the relevant literature reveals the following points.

- i. **Department for Transport Road Latest Accident Statistics/Road Casualties** (2019) show that 39 children were killed, 27,697 children were seriously injured, 11,317 slightly injured in RTA's. For accidents near crossings, there were 831 accidents near crossings (of all types) involving children. 242 were injured at zebra crossings, 291 at pelican crossings, 230 at light-controlled junctions.
- ii. '..... thousands of children are injured on our roads every year, making road traffic accidents a significant cause of premature child death. **SOURCE –Royal Society for Prevention of Accidents. Guide to School Site Road Safety.**
- iii. 'For the past 30 years, children have been progressively removed from the roads which have been abandoned to motor vehicles. This created a vicious circle: traffic makes the roads unsafe so parents will drive their children everywhere' **Source – Schoolstreets.org.uk.**
- iv. Enabling children to walk or cycle to school in a safe and healthy environment is good for their health, good for the environment, good for air quality and good for social inclusion. the Government aims to have a world where a 12-year-old can cycle and walk safely on our streets; this...in turn underlines the need to create both the right infrastructure and the right culture of road safety. **SOURCE – Department of Transport/Road Safety Statement 2019.**

All of these points have a very direct relevance to the manner in which TRDC's Planning Department is approaching the issue of road safety in Maple Cross in the context of this and other closely located developments, and the 'ping pong' activity between TRDC and HCC in terms of who is accountable for ensuring that roads *in what are residential areas* are fundamentally safe. There has been no direct consultation with local residents on this topic, against much of the national guidance which notes the importance of discussing topics like this with the local community. It *'feels as if'* this dangerous road scheme is very much being *'imposed'* on the residents of Maple Cross.

This summary thus far focusses on school travel hours. But we should not lose sight of the fact that this warehouse, in its current configuration, is projected to operate on a 24/7 basis. That means that there is a very high chance of interaction between residents, children, pets and this substantial stream of traffic during evenings, at night, at weekends and during holiday periods. This not only has the potential to create pedestrian accidents but will generate a continuous stream of noise right next to residential housing in an area that is currently 'near silent' at night, none of which the developer has apparently considered. On this basis, the Residents Association expects that TRDC makes a thorough and proper evaluation of this topic, including accident risk, noise and pollution before any consideration of planning application 21/0573/FUL.

Junction B

Junction B poses a different kind of problem related to the nature of traffic travelling down the boundary road and its interaction with the A412. If we firstly *assume that all HGV's and LV's/LGV's travel down this road*, this generates extra traffic of 556 vehicle trips at this entrance/exit at school peak travel times (8-9am,4-6pm). This then assumes that no traffic would go down Maple Lodge Close, but it also makes no assumptions at this stage for Thames Water traffic, or for Bulk Transfer⁵, or for the Hotel. None of these seems to have been properly evaluated in this assessment which is extremely concerning given the proximity of school children, the impact on families and family life in many respects including pollution and noise. TRDC need to formally addresses this topic in a proper open and transparent planning process which takes all of the relevant data into consideration, without any exclusions.

The data at this junction shows that between 8-9am there will be 4.1 incremental vehicles per minute due to the warehouse development, and so a warehouse related vehicle will cross this junction (either in or out) every 15 seconds. Between 4-6pm there will be 2.6 vehicles per minute and so a vehicle every 23 seconds. In relation to HGV's there will be 0.3 HGVs per minute between 8-9am and 0.2 HGVs per minute between 4-6pm. This is a vehicle every 180 seconds and every 300 seconds respectively. This is still a sizeable level of traffic and

⁵ We believe that Bulk transfer is the name of the operator of various businesses operating opposite the hotel site

particularly when you consider that the Thames Water derived HGV traffic, and the various Bulk Transfer activities are excluded from this statistic.

HGV'S AND CHILDREN/PEDESTRIANS/CYCLISTS IS NOT A GOOD COMBINATION

If we then go on to consider some of the issues associated with HGV's. It is well known that HGVs contribute disproportionately to accident statistics.

- HGVs are disproportionately more likely to be involved in a pedestrian death. Between 2009 and 2013 they made up 13 per cent of pedestrian deaths despite accounting for only 5 per cent of traffic in GB. This is because accidents with heavier and larger vehicles are more likely to result in fatalities or serious injuries even at lower speeds. **SOURCE – Department for Transport**
- Despite making up only a relatively small proportion of road traffic, HGVs are regularly involved in some of the most serious accidents on Britain's roads. many accidents involving HGVs come down to simple lack of visibility. The height of the cab from the ground results in a corresponding increase in the HGV's blind spot – which is one of the reasons that smaller, more vulnerable road users like pedestrians and cyclists can frequently be in more danger than car drivers. In 2015 alone, there were 377 collisions reported with cyclists – almost a third of whom were seriously injured or killed. **SOURCE – Vision Techniques**

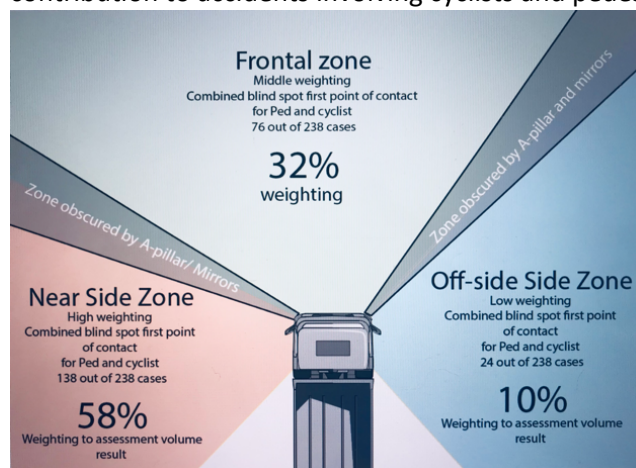
The document produced by Loughborough Design School's 'The definition, production and validation of the Direct Vision Standard (DVS) for HGVs' report, published in December 2018 for the Mayor of London is extremely informative on the topic of HGV risks to cyclists and pedestrians. This document was produced because the London Mayor's office had to respond to the high number of HGV accidents involving cyclists and pedestrians. The introduction notes *"The research has been conducted against a background of over representation of heavy goods vehicles (HGVs) being involved in road traffic accidents with vulnerable road users (VRUs) where 'failed to look properly' and 'vehicle blind-spot' are often reported as the main casual factors in the accident data...."*

Given the fact that this road junction and the surrounding junctions will be characterised by a heavy use by HGV vehicles both as a direct consequence of this development, and as a consequence of increased use of the Thames sewage facility, this topic should be actively and properly considered, which does not seem the case thus far. We would also draw attention to the fact that the warehouse developer's agent makes great reference to the numbers of employees who will be cycling to work. This is fanciful in a scenario where large numbers of HGV's will be accessing this road.

The work done by Loughborough summaries the accident statistics for HGV's. Firstly, the causation data for the top 95% of accidents shows the following rankings;

1 = failed to look properly, 2 = vehicle blind spot, 3 = poor turn or manoeuvre, 4= passing too close to cyclist, 5= careless

Another perspective is provided by the following schematic which provides a summary of the blind spot contribution to accidents involving cyclists and pedestrians.



SOURCE = Loughborough Design School's 'The definition, production and validation of the Direct Vision Standard (DVS) for HGVs' report, published in December 2018

The solution that Greater London has derived, in the face of this strong evidence of blind spot contribution to accident levels, is to ban all HGV's proven to be dangerous to cyclists and pedestrians. This should be a policy that TRDC and HCC working in tandem actively consider in relation to this development, by for example, only allowing HGV vehicles with a 5 star (direct vision standard) onto this warehouse/s site. This would help to ensure that local people and especially children, faced a diminished risk from the heavy increase in HGV vehicles into what is fundamentally a residential area. Certainly, all HGVs with a zero star, a 1- or 2-star rating should be excluded from the outset, which would allow the Three Rivers district to take the benefit of the research and thinking that has led to Greater London's progressive policies to protect its citizens from avoidable danger.

At the present time, the developer is making a virtue out of the fact they will add a pelican crossing where there is none, and this is their contribution to risk mitigation. As noted in the latest Road Accident Statistics quoted above ". For accidents near crossings, there were 831 accidents near crossings (of all types) involving children. 242 were injured at zebra crossings, 291 at pelican crossings, 230 at light-controlled junctions. The best policy here surely is to ensure that children and heavy/industrial traffic are not placed in the same location.

THE CONSEQUENCE OF TRAFFIC – NOISE

One immediate and direct consequence of this enormous amount of incremental traffic into this residential area on a 24/7 basis is the amount of noise, on a continuous basis.

We note that the developer has used a modelling approach to determine the likely level of noise from this site. We strongly dispute this approach, on the basis that the developer could easily measure the base level of noise from this site. It is easily accessible. Nothing is stopping them from doing so, except the possibility that they may not like the answer. Mathematical modelling is the practice of developing a system which explains or predicts what is happening or will happen in real life. Models are only as accurate as the data **inputs** and **assumptions** which underpin them. It is therefore essential that TRDC makes a robust challenge of the model used by the developer to maintain public confidence. To be blunt, TRDC should not just take the developers word for it as they have a massive, vested interest in one specific outcome. TRDC needs to commission their own noise assessment in the interest of proper balance in this process. To be more specific, we believe that the developer and their agent have misclassified and characterised this land as 'urban' when in fact it is quiet and rural in nature, especially at night. We would also point out that the developer has omitted to measure the noise emissions all around the site, including at Springwell lake, and to the impact of heavy LV/LGV traffic down Maple Lodge Close and this is an important oversight.

The Environment Agency/SEPA/E&HS document IPPC H3 (part 2) Horizontal Guidance for Noise Assessment and Control is revealing about the use of modelling in planning decisions. And In this context, we believe that the following points – as flagged by the document referred above as essential questions to be answered in a planning process - need to be answered by TRDC's Planning Department in respect of the use of the developers chosen modelling approach before any decision on this point or acceptance of what the developer and their agent/s have asserted;

- | |
|---|
| <ul style="list-style-type: none"> a) Has a suitable site visit been carried out to collect input data and measure background noise levels? b) Have external source noise levels been correctly evaluated? c) Has noise breakout from buildings been correctly evaluated? For example, accurate assessment of internal noise levels; use of correct building attenuation figures; correct surface areas of building elements used; acoustically weak areas identified. d) Have the correct sound level meters been used and octave–band measurements made? e) Is the modelling method appropriate and does it follow known standards or empirical formulae? f) Has geographical and topological data been input correctly into the model? Eg,, correct scale, alignment and terrain data. g) Have the physical elements been input correctly into the model? For example, buildings/barriers included and correct height; ground effects accounted for. h) Has the noise source data been input correctly into the model? For example, sound power, or sound pressure and "on-time" corrections. Has the source type been described correctly? For example, point, line, area sources and directivity. Has the calculation grid been set up appropriately? For example, adequate resolution. Have the correct receptors been chosen? For example, right locations, heights, and the effects of facades and barriers considered i) Are individual noise sources being modelled correctly? For example, consider sources in isolation, check appropriateness of distance attenuation, barrier effects and the like. j) Finally, do the results appear reasonable? |
|---|

All of these questions need to be reviewed and assessed rigorously by TRDC, as the negative impact on local residents could be appalling, in the eventuality that some of the inputs into the model have been judged incorrectly. To summarise, we would highlight the fact that many of these questions do not appear to have been answered so far, in relation to the point that the developer is claiming that the noise level emitting from this site is lower than a quiet day in the countryside. And so, the results shown so far by the developer's agent do not pass 'the sniff test' and Residents are looking for a robust objective assessment of the noise emitting from this site on the part of the Council, rather than a 'wave through' on the basis that a commercial organisation must be right. This would not represent 'planning balance'.

Moving on to consideration of the extent and nature of the noise that will be emitting from this site. And again, we go back to the traffic and trip estimates provided by the developer shown earlier in this document.

TABLE 5 – NOISE EVENTS

What are the noise events associated with each visit to the warehouse/s?

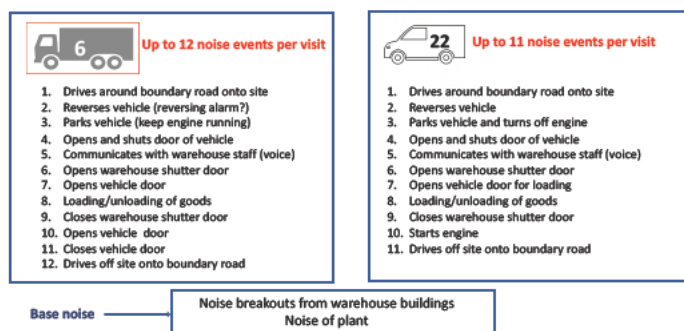


Table 5 above summarises the types of noise events we might expect to hear from warehouses, generated by arrivals and departures on a 24/7 basis. This table has been constructed with the input of a warehouse worker. This analysis excludes base level noise or breakouts from the warehouse itself which should also be taken into consideration. Table 6 below shows the original vehicles data from page 3 and then summarises on that base the number of discrete noise events we can expect to experience based on these assumptions.

TABLE 6 – NOISE EVENTS PER 24 HOUR PERIOD

Hourly segments	HGVs visiting site	LGV's and LV's visiting site	TOTAL HGV's + LGV's, LV's	HGV Noise events	LGV's and LV's Noise events	TOTAL HGV and LGV, LV Noise events
midnight-1am	6	20	26	72	220	292
1am-2am	6	22	28	72	242	314
2am-3am	4	10	14	48	110	158
3am-4am	6	20	26	72	220	292
4am-5am	4	16	20	48	176	224
5am-6am	4	14	18	48	154	202
6am-7am	6	20	26	72	220	292
7am-8am	6	38	44	72	418	490
8am-9am	10	114	124	120	1254	1374
9am-10am	0	42	42	0	462	462
10am-11am	24	34	58	288	374	662
11am-midday	0	38	38	0	418	418
midday-1pm	0	28	28	0	308	308
1pm-2pm	0	76	76	0	836	836
2pm-3pm	6	38	44	72	418	490
3pm-4pm	20	14	34	240	154	394
4pm-5pm	6	34	40	72	374	446
5pm-6pm	6	108	114	72	1188	1260
6pm-7pm	7	72	79	84	792	876
7pm-8pm	4	10	14	48	110	158
8pm-9pm	4	6	10	48	66	114
9pm-10pm	4	10	14	48	110	158
10pm-11pm	4	10	14	48	110	158
11pm-midnight	4	10	14	48	110	158
Total x vehicle type	141	804	945	1692	8844	10536

This table uses the assumptions shown in table 5 as the basis. This then tells us that local residents can expect to experience 10,536 noise events every day emitting from this warehouse complex. Of these noise events 2,362 will occur during the evening and night between 8pm and 7am. Even between midnight and 1am there will be 292 noise events rising to 314 noise events between 1am-2am. This represents a noise event every 11.5 seconds between 1am-2am. This is against the backdrop of a current near silent environment for residents at night.

The developer's agent has not evaluated the impact of noise events travelling across Springwell Lake to the housing on the other side. Noise travelling at night across water is likely to cause nuisance to these residents. Sound wave speed is dependent on air temperature. During the day, temperatures are warmest nearest the surface and cool off with height. (lapse rate). When a noise travels across the lake, the sound waves nearest the surface move faster than the sound waves higher up. At night time this is inverted, meaning that temperatures increase with height. Sound waves higher up will move faster meaning that sounds bend downwards. The consequence of this is that the noise events emitting from the warehouse area will travel across Springwell lake and cause nuisance to the residents on the other side. This has been totally omitted from the sound evaluation activity undertaken thus far which is a critical oversight on the part of TRDC and a convenient oversight for the developer. In the face of this, the Residents Association expects that TRDC will commission an independent noise assessment before any consideration of this development, and will actively consider the locational noise issues around Springwell Lake, in Maple Cross Close and beyond.

THE IMPACT OF NOISE ON SLEEP (and NORMAL LIFE)

One of the impacts of the large numbers of vehicles accessing this site then is the significantly increased industrial noise that will emit from the site. There are a reasonable number of reputable studies available to inform us of the possible impacts that interruption to sleep may have on the nearby residents of Maple Cross as a consequence of the development of this warehouse complex.

A summary of some of the main literature on this topic is provided below;

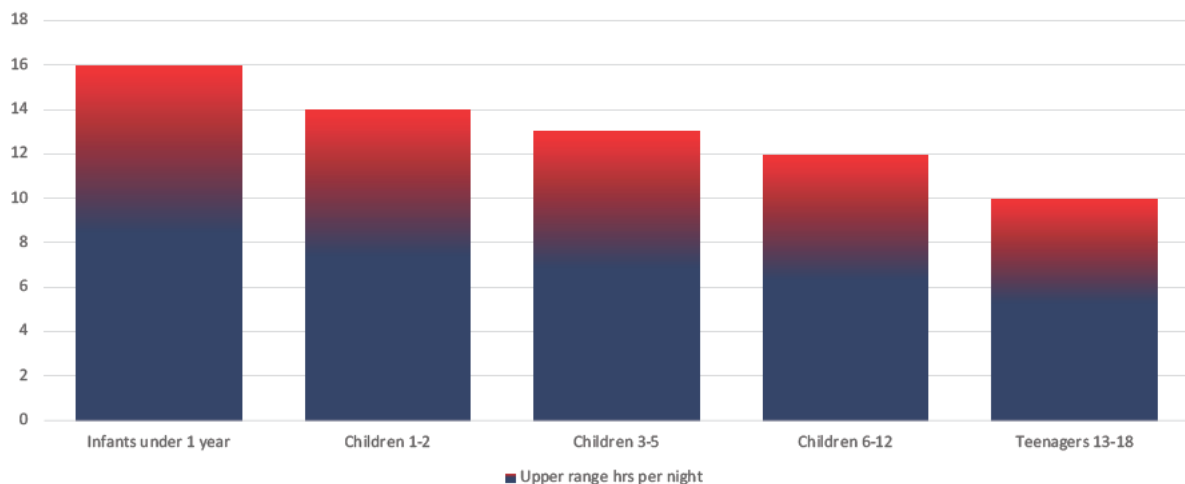
- i. 'Environmental noise, especially that caused by transportation means, is viewed as a significant cause of sleep disturbances. Poor sleep causes endocrine and metabolic measurable perturbations and is associated with a number of cardiometabolic, psychiatric and social negative outcomes both in adults and children'
SOURCE - Environmental noise and sleep disturbances: A threat to health? Demian Halperin/Dec 2014
- ii. 'It is generally accepted that insufficient sleep and particularly sleep loss has a great influence on metabolic and endocrine functions as well as on inflammatory markers and contributes to cardiovascular risk. C-reactive protein (CRP) as a major marker of the acute phase response to inflammatory reaction promotes secretion of inflammatory mediators by vascular endothelium and may be therefore directly involved in the development of atherosclerotic lesions. CRP as a risk predictor of strokes and heart attacks linearly increases with total and/or partial sleep loss' SOURCE = World Health Organisation Night Noise Guidelines ISBN 978 92 890 4173 7
- iii. 'Sleep restriction leads, in approximately 40% of affected subjects, to daytime sleepiness that interferes with work and social functioning. Excessive daytime sleepiness is thus a major public health problem, as it interferes with daily activities, with consequences including cognitive problems, motor vehicle accidents (especially at night), poor job performance and reduced productivity....New evidence suggests additional important health-related consequences of sleep debt related to common viral illnesses, diabetes, obesity, heart disease, depression and other age-related chronic disorders' SOURCE = World Health Organisation Night Noise Guidelines ISBN 978 92 890 4173 7
- iv. 'children with disturbed sleep present cognitive dysfunction and behavioural disturbances, abnormal growth hormone release, increase of diastolic BP and an increased risk of accidents and use of sleeping pills. SOURCE = World Health Organisation Night Noise Guidelines ISBN 978 92 890 4173 7

On this last point iv, Children are especially susceptible to sleep interruption. The data below illustrates the sleep needs of children by various age bands. We believe that there are around 82 children within the immediate vicinity of this development who will be impacted by noise emitting from this site.

TABLE 7 – HOW MANY HOURS SLEEP PER NIGHT DO CHILDREN NEED?

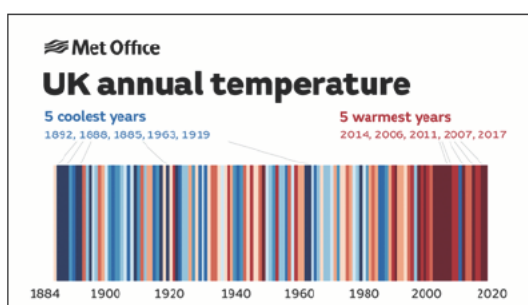
Why is a good night's rest important for children?

“Studies have shown that kids who regularly get an adequate amount of sleep have improved attention, behavior, learning, memory, and overall mental and physical health. Not getting enough sleep can lead to high blood pressure, obesity and even depression” (SOURCE – Johns Hopkins University)



Data on how many hours sleep per night do children require? SOURCE – Johns Hopkins University

In order to try and mitigate the impacts of noise in sleeping residents may then be forced to sleep with their windows closed, even if this would solve the noise problems which is uncertain. But it is not reasonable to expect c. 389 people to change their habits to such an extent so that a warehouse developer can maximise their profits. This doesn't seem like a balanced outcome. The table below shows the extent to which temperatures have increased over the last 20 years over the prior period. Less than 5% of households in the UK have air conditioning. It is not reasonable to expect children (or adults!) to sleep permanently with earplugs in order to get a good nights sleep.



The warehouse developer has asserted that this development will not be viable unless it operates on a 24/7 basis. But we can see no evidence on the planning site that this statement has been challenged at all. Operation on a 24/7 basis will have a sizeable negative impact on both residents and the wildlife in the area, and so TRDC should obtain access to the detailed financials for this project so that the statement about viability is subject to proper and rigorous review. The 'fact' of 24/7 operation should be challenged robustly by TRDC as part of its assessment of this project.

If we consider the impact of noise more generally on the residents who live in and around this area, the development will have a significant impact on residential amenity, that is the benefit enjoyed from physical external space which is part of the private home. Residents can expect peaceful enjoyment of their garden to be a thing of the past, to have social activity in the garden extensively disturbed by warehouse activities. There

is far less traffic in the area at the weekend due to the lack of commuter traffic coming from the M25, and so the warehouse traffic will provide a far larger contribution to local traffic, noise and pollution. This seems to have been excluded from any assessments seen on the planning portal. The data used as a base point represents a busy weekday. The incremental impact at the weekend or at nights would represent a far higher % uplift. Again this has been conveniently excluded in the estimates provided.

Maple Cross, Rickmansworth and Mill End are very quiet at night with very low levels of traffic. The introduction of a noisy and polluting 24/7 activity is likely to inconvenience many residents. HGV's and LGV's/LV's will not confine themselves to the road up to the M25 as has been suggested. This development will inevitably lead to more traffic on the A412, through Rickmansworth and on the A412 to Denham. This is not mentioned by the developer although it is likely to disturb many residents in the locality.

These points should be actively considered by TRDC as part of this planning submission and who should properly question whether this warehouse complex should be allowed to open at weekends and past reasonable working hours.

Residents in what is currently a quiet area should not expect to be seriously and perpetually inconvenienced by the development of this warehouse complex, and worse to have the ability to enjoy a peaceful and restorative private life removed. In the balance of consideration of this warehouse much has been made of the jobs on offer, but there has been little discussion of the damage and compromise to existing residents. This development through its highly noisy and polluting characteristics will significantly compromise the lives of almost 400 residents living in Maple Cross, in the various residential streets and blocks shown in Table 8 below, together the with impacts on over 600 members and active volunteers of the Maple Lodge Conservation Society.

TABLE 8 – WHO IS MOST LIKELY TO BE IMPACTED NEGATIVELY BY THIS DEVELOPMENT?

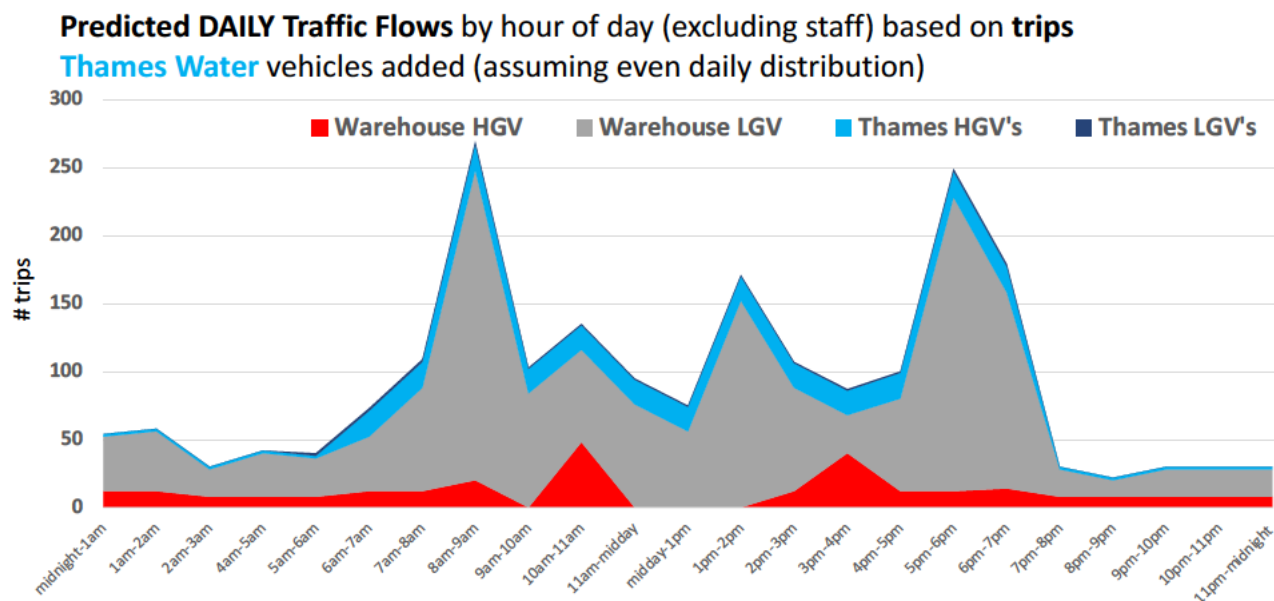


TRAFFIC EVEN WORSE THAN THE SCENARIOS SHOWN THUS FAR

The scenarios considered thus far have been based on the warehouse developers' vehicles estimates, and the trip estimates which have been validated by the TRDC Planning Department in writing. But these traffic flows are not the only issue to consider within the context of the proposed development of this warehouse complex. Thames Water also uses this road for heavy HGV traffic travelling to the sewage facility. We believe that some of this traffic may be incremental. These are certainly vehicles of potential high risk to children. As noted

previously, residents have noticed an increase in HGV traffic along the boundary road into the sewage works. It is telling that Thames Water have also very recently improved access to the front of their site – the pumping area to facilitate ingress and egress and no doubt to accommodate this increased traffic.

TABLE 9 – TRAFFIC PATTERNS BASED ON TRIPS WITH THAMES HGV TRAFFIC NOW INCLUDED



This chart shows the number of HGV and LV TRIPS by hour of operation. One HGV going into the site and going out is counted twice – each time it makes a trip (a trip into the site and a trip out of the site) SOURCE – Cole Jarman Report page 16 (Planning Noise Assessment)

We have intelligence obtained via Thames Water that site traffic stands at 120 HGVs per day into the Thames Water site (and so 240 trips along the service road, 1 trip in and 1 trip out). There are also about 10 LVs per day (20 trips) discharging sewage at the point just outside the gates and 10 HGVs at night. This excludes staff cars going down Maple Lodge Close. The inclusion of Thames Water vehicles increases the 'school hours' HGV exposure to schoolchildren by a total of 104 vehicles per day. We do not have data by time of day and so have spread the flow of traffic across the working day. This may not be the case. It would be particularly concerning if this traffic clumped at school times.

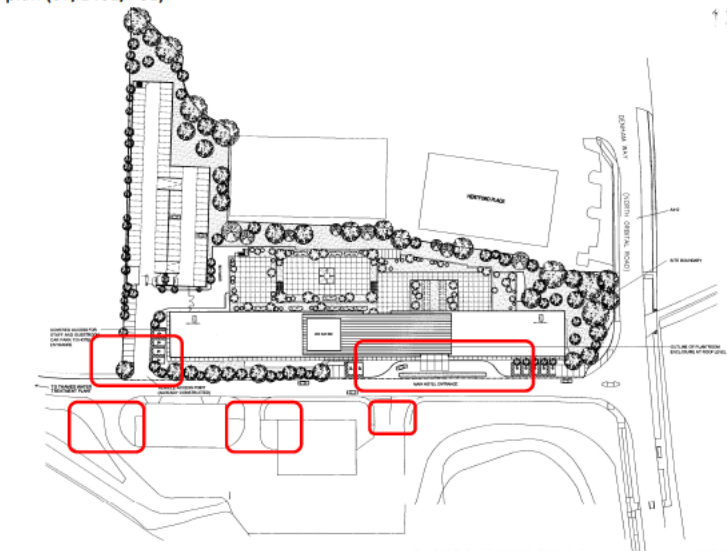
In the context of this it would be appropriate for TRDC's Planning department to formally requests a traffic /trip count from Thames Water and that this is included in the assessment, which has not been done so far.

The second issue is around the previously granted planning permission for the Maple Cross Hotel. The Maple Cross Hotel has already been granted planning permission by TRDC and has 373 parking spaces allocated and 207 bedrooms. There will be a morning egress and an early evening/mid evening ingress of vehicles which will have an enormous impact on this junction. The impact of this, we understand has not been taken into consideration in the traffic assessments. And so, the traffic assessments need to be done again, pending any approval, or removal of the permission for the hotel, and/or the warehouse. This is a serious oversight and the impact of two major developments, together with the increased Thames Water traffic along the Boundary Road will generate enormous levels of traffic locally.

Table 10 below shows the double entrance/exit to the hotel plan together with the entrance/exit to the car park along the side, together with the various access to the Bulk transfer site which has a large number of HGV's and vans currently parked along the boundary road. This scenario would result in at least 4 busy access points within a few metres of the main road crossing. This is explored in more detail later in this document.

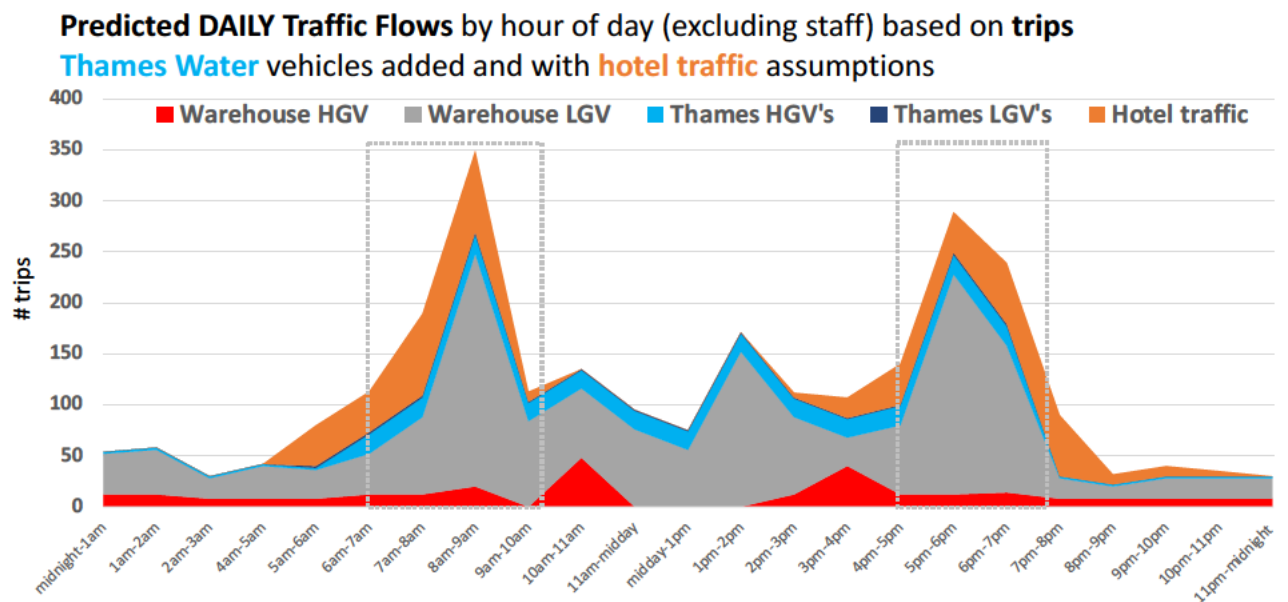
TABLE 10 – HOTEL PLAN WITH 3 ENTRANCE/EXIT POINTS PLUS BULK TRANSFER ACCESS OPPOSITE

Hotel plan (07/1401/FUL)



In order to assess the effects of this development on the proposed warehouse complex traffic we have made some conservative assumptions about hotel traffic from staff and guests and overlaid these estimates onto the chart shown previously, together with the Thames Water HGV data. This is shown in table 11 below. For the additional hotel traffic alone, this pattern would add 240 extra 'trips' to the traffic at this junction in school hours, resulting in a total of 884 additional trips every day between the hours of 7-9am and 4-6pm at this junction. That's an incremental vehicle in or out of this junction every 16 seconds. (assuming an even distribution). It should be noted that this excludes Bulk Transfer, and given the extensive HGV activity on that site, this should also be properly included in the evaluation.

TABLE 11 – BOUNDARY ROAD AND JUNCTION A412 TRAFFIC (WITH THAMES WATER + HOTEL)



This chart shows the number of HGV and LV TRIPS by hour of operation. One HGV going into the site and going out is counted twice – each time it makes a trip (a trip into the site and a trip out of the site) SOURCE – Cole Jarman Report page 16 (Planning Noise Assessment)

We believe that this scale of traffic, plus the important issue of Thames Water Sewage carrying vehicles having to access the site without delay, means that a proper assessment and investigation should be carried out by TRDC and HCC working together should happen before any consideration of the warehouse complex proposal.

Finally, there are 3 additional omissions that TRDC need to consider in their evaluation of traffic; the omission of Hertford Place, the omission of Bulk Transfer, and the omission of Woodoaks Farm – given the rapid expansion of visits to this site.

Hertford Place

Hertford Place is due to undergo/has undergone a full category A refurbishment according to Paribas who lists the space as up to 57,587 square feet. At an 'ideal' office to space ratio of 100 sq ft per employee this would potentially fit up to 576 employees and maybe more with a 70 sq ft per employee ratio which is the normal London ratio. The limiter for traffic is the car park which has 255 spaces. It is worth noting that this office at full capacity would then generate significant additional pedestrian and cyclist traffic. At full capacity there would also be inevitable pressure on the car park and the possibility of executives parking in the side roads, close by or slightly further away in Maple Cross. This would add to the already concerning scenarios discussed and should be properly considered.

Bulk Transfer/land adjacent

Bulk Transfer/the associated area has up to 90 HGV licences, the details of which have been passed to TRDC by the Residents Association. An inspection of the map below at table 11 (which was provided as part of an associated planning case) shows approximately 214 vehicles parked on this site. I am not sure of any justification for excluding this site from any transport assessment. Whilst it may not be on the public highway, this traffic will come out onto the public highway and the combination of all of the traffic streams listed could create a very unfortunate scenario, in which pedestrians, cyclists and people who travel around these junctions would face the consequences. Neither TRDC, not HCC can legitimately ignore this issue for all of the reasons noted previously in this document.

TABLE 11- BULK TRANSFER SITE (top– HGV PARK B-MAP)

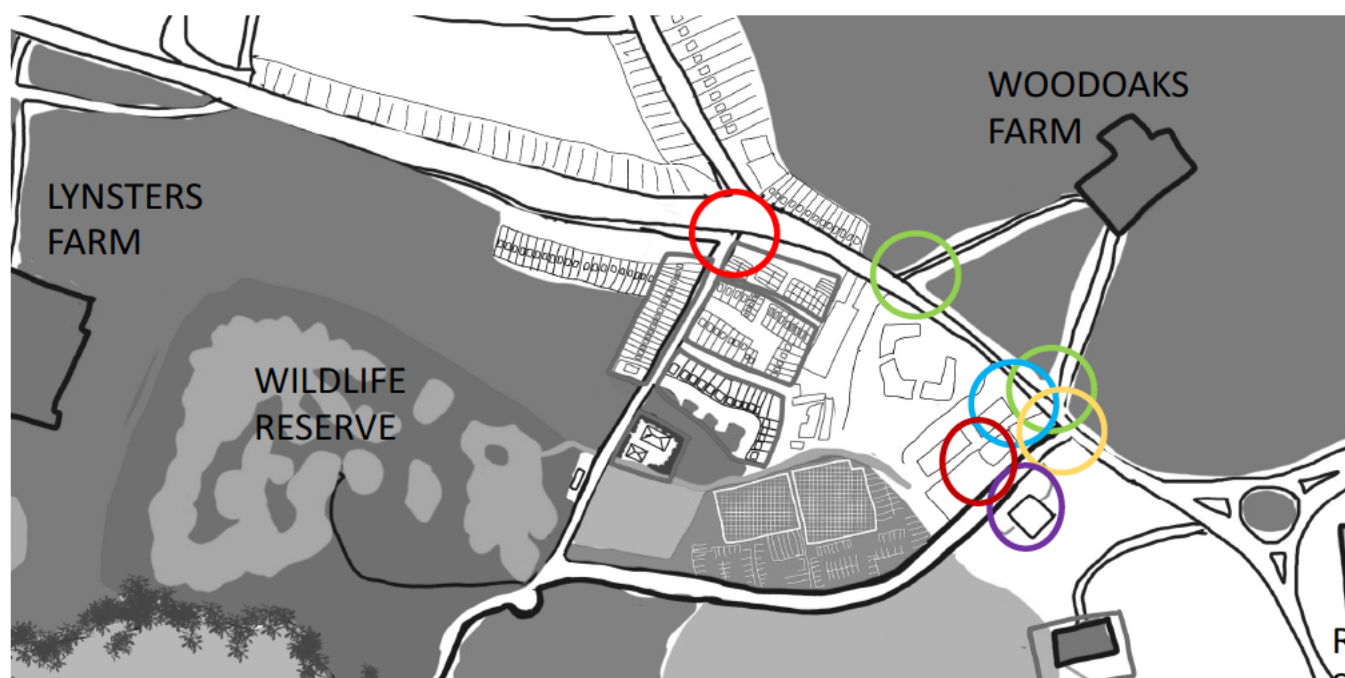


Woodoaks Farm

Woodoaks Farm has generated considerable pedestrian (and associated vehicle) traffic in lockdown due to people taking walks around the farm, and visiting the new facilities there. (open air tea shack and brewery facilities). As the new tenant/owner is very interested in opening a farm shop (a concept that is very popular amongst the residents who would wish to support this), excluding this stream of traffic from the estimate on the basis that is small and unlikely to grow is simply erroneous. As this site has a strong interaction with the boundary road junction – the traffic should be evaluated and included.

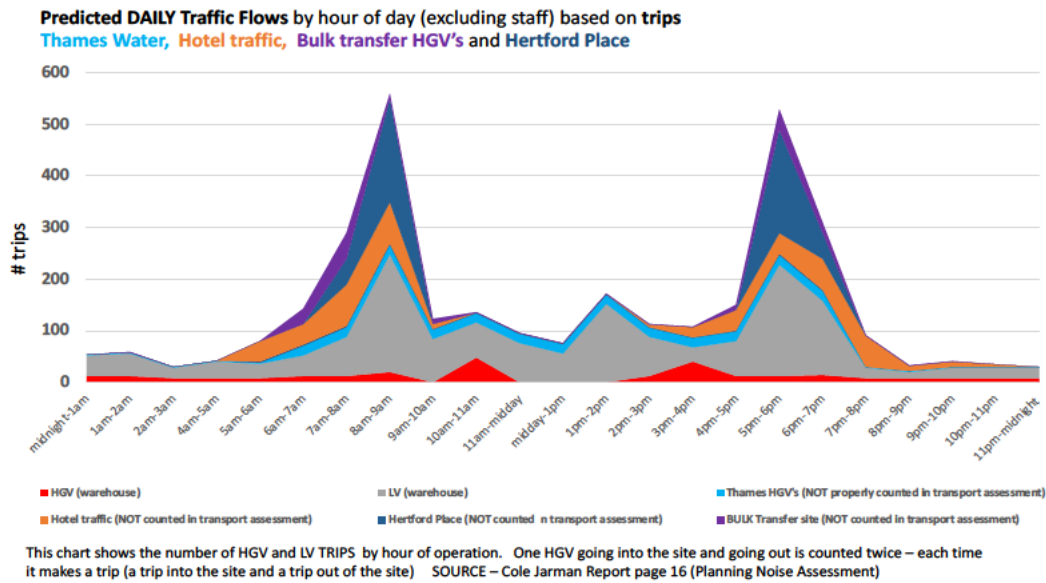
If we then consider the impact of these various omissions in terms of junction proximity in Table 12 below. The two green circles are the entrance/exit routes from Woodoaks, the pale blue circle is Hertford Place, the yellow circle is the boundary road/A412 junction. The dark red circle is the hotel (2 entrance/exits planned) and the purple circle is Bulk Transfer. At the current time it is understood that the dark red/purple/pale blue and green areas have **been totally excluded** from the traffic assessment. This is highly problematic as traffic from all of these sources will pour into and out of this junction and those nearby on the A412.

TABLE 12- JUNCTION PROXIMITY/OMITTED TRAFFIC



Going back to our charted illustration of the (trip based) traffic levels, we can make some judgements about the type of traffic that these omitted items could generate. For the illustration below, we have assumed that Bulk Transfer generates 180 trips per day, mainly in morning and late afternoon peak and that Hertford Place will use its car park capacity at 500 trips (250 each way at morning and evening office peak hours). There is no allowance for Woodoaks Farm as we have no data on which to base any estimate.

TABLE 12 – ADDING BULK TRANSFER AND HERTFORD PLACE



As the Planning Committee can clearly see from Table 12, as the sections in pale blue (Thames Water), orange (the hotel), dark blue (Hertford Place) and purple (Bulk Transfer) have all been excluded from the transport assessment, there would appear to be a significant problem – which TRDC need to properly evaluate before any decision. As it is likely that the pollution estimates and the noise assessments have all been done on the basis of the reduced traffic levels, this should also be the subject of proper revision.