

Objection to the Church Wood, Three Houses Lane development (24/02343/FP)

Outline

As the closest direct neighbour of the proposed development, I wish to object to this application. We live on Three Houses Lane, between the B656 and the applicant site. As such we have observed first-hand the development of this site over the last year.

The applicant seeks a change of use from three agricultural storage units into a site that, based on activity to date, has already become de facto an industrial complex for the storage and assembly of large architectural metal fabrications. All this in the heart of a Greenbelt area of natural beauty, enjoyed hitherto regularly by walkers and cyclists.

Although there are many reasons this application should be refused, I consider the safety risks from the heavy vehicles travelling down a narrow winding country lane are so significant I intend to focus this objection upon what I consider to be a core issue - Traffic Safety and management.

1 Three Houses Lane -Traffic safety and management

Three Houses Lane is a quiet narrow lane, just off the busy B656. The applicant site is approximately 0.65Km down Three Houses Lane, with no place that two HGV vehicles can pass between the main road junction and the site. When such vehicles do meet, inevitably one of the vehicles has to reverse back to one of the ends of the road.

(Please see video of large HGV reversing past our house16/12/24):

https://1drv.ms/v/c/8a7265bff6ecf20e/ESa0ysghxAxltZoxJ-bNceUBcqNWPgx_BppSgjetp81wNA

From observation the use of a banksman does not happen on these occasions. And in practice it is impractical given the issues arise at random times on the public highway with no available trained person to act as banksman.

All the HGV vehicles (vehicles 3500kg and over) struggle with reversing a long way down a narrow, winding lane. The articulated vehicles find it almost impossible, because the road is too narrow to accommodate appropriate steering manoeuvres.

See below picture of HGV stuck in the ditch outside the applicant's entrance 11/12/24:



As a result of this activity the road edges are already broken away in many places and combined with the regular flooding in the winter months (HCC have a temporary Flood sign permanently in place opposite the applicant site). When flooded the banks can overflow making it difficult to see the ditch -and as a result vehicles regularly tip into these ditches and get stuck obviously disrupting local traffic (See Appendix B for photograph of flood)

Picture: Three Houses Lane approximately 400m from the B656 junction:



The greatest danger arises, however, at the junction with the fast-moving B656. The turning out onto the B656 is uphill. Difficult enough in a car, but significantly more dangerous in a long vehicle that if turning South is also uphill.

This is further exacerbated by ice in the winter months. Although the B656 is normally treated for ice, the exit from Three Houses Lane is not, and the exit towards the B656 is frequently very slippery. Vehicles thus emerging onto the B656 inevitably move slowly as they struggle for grip. The prospect of fast-moving traffic from the south, which has limited visibility of the junction, finding an HGV slowly moving across its path is clearly a significant risk of a major accident.

The EAS survey from the applicant uses data from CrashMap. It suggests there have been no significant incidents on Three Houses Lane. However, that same CrashMap data shows a serious incident just north of the junction with the B656 that we have been discussing. The B656 is well known as a dangerous road with several fatalities over the years.

The theoretical traffic numbers for Three Houses Lane proposed in the EAS survey are clearly contradicted by their own data. This data, collected from the applicant's physical speed K&M Traffic survey, demonstrates, as backed up by CCTV observation, that the normal usage is very light, and their proposed increase is indeed significant. (See Appendix B for analysis and methodology). If planning permission were to be granted there could be significantly greater percentage increase in traffic than that suggested in the applicant documentation.

The data does underplay the role of cyclists -this is a well-known popular route for leisure cyclists. There are now very few pedestrians in the lane -frankly recently it has become quite dangerous. But it has remained a popular route for cyclists -quite often there are more cyclists than motor vehicles. Meeting an HGV on a cycle on a 4m wide road is scary and dangerous.

The EAS Traffic survey provided in the application has a number of inaccuracies or inappropriate data points. These are covered in detail in Appendix A, but in summary the speed measurements were taken at an inappropriate point, so wrong calculations made.

The width of the road for most of its length crucially is c.4m not 5m as stated in the EAS submission.

And finally for any passing place to be useful it would need to be between the road junction and the applicant site. No such proposal is made -nor indeed is practical.

If any form of planning permission were to be considered, then it seems obvious that enforceable restrictions quantity, size and type of vehicle should be set. Operating hours and quantity of goods movement should be set as should associated operating procedures. The application seems to acknowledge the need for this -but as proposed is vague and unenforceable.

2. Other Key Issues

2.1.Noise

Whilst not at the core of this objection, the issue of noise needs to be considered. The application conclusions use data taken over a four-day period, which include a weekend when the facility typically does not operate. The noise level is typically concentrated into 8 hours or so, weekdays only, with some occasional Saturday work. So, the data provided, which is based around a weekend, is clearly misleading - materially understating the noise level achieved during operational hours

The noise level from the site, as observed over recent months, does vary from time to time. When it is noisy it is loud and intrusive. The applicant has offered to install appropriate noise reduction fences or hedging along our mutual boundary, which we have acknowledged would be helpful.

2.2. Non Storage/Distribution activities

As stated, the application is for storage and office accommodation. The applicant's business manufactures 'Heavy Civil Engineering' projects. The introduction of metal fabrication on this site would be massively detrimental to the nature of the area (noise, traffic etc). It is evident that fabrication from component parts already takes place on this site. Whatever the outcome of this application is, were it to be approved it should be on the basis of comprehensive conditions defining the types of acceptable activities.

3.Application inaccuracies

3.1 The Design and Access statement states "*The site is surrounded by woodland within its immediate locality, with the nearest neighbouring properties being located approximately a mile to the East and West*". This is demonstrably not true. I estimate the distance between the largest of the storage units and our physical house is approximately 225m. This can be clearly seen on their own site map.

3.2 The Formal Application Form contains a number of inaccuracies

3.2.a Vehicular access. The application states that the entrance this has not been altered. This is incorrect it has been significantly widened.

3.2.b The application states that there no trees or hedges on land adjacentmight be important as part of local landscape character. As part of the Greenbelt this has to be challenged

3.2.c The buildings are clearly visible from the road, contrary to the application

3.2.d The application states that Foul Sewage is disposed by mains sewer. No such sewer exists

3.2.e The application states that the hours of operation are not important. Clearly given the traffic issues, this is not the case

3.3 The EAS Traffic Survey has so many inaccuracies, these are detailed separately in Appendix A

3.4 NSL Planning noise assessment.

The report on noise is fundamentally flawed since it uses data measured over a period of some 96 hours over a weekend, when, based on observed working patterns, less than 20 would be normal working.

The report does give the individual data and this shows that for the two working sessions measured LAeqT sound pressure measurements of 63.3db and 71.1db were reported. These are, in effect, average figures taken over 16 daylight hours. The individual noises during the working day would have been much higher would have been much louder. The report then suggests that these two readings might be disregarded because construction work was taking place. So in effect they propose only to measure the sound when the site was not active.

The highest recorded individual sound was over 110db LAFmax, (c 10am ,Monday 18th March)

The unattended survey was undertaken from a point on the east façade of barn 1. This would have the effect of that barn shielding sound from where a majority of the activity takes place.

There is sufficient doubt in this methodology to reject this report.

4. Conclusion

I believe that the proposed application is out of character with the rural nature of this Greenbelt woodland. There are many places for industrial development -common sense says this is not one of them.

The application is flawed, as identified, in many respects, but especially on the core issue of Road Safety it offers no workable solution. I therefore believe this application should be rejected. If it were to be granted in some way, then significant, enforceable conditions should be clearly established -especially around a) the number, type, length weight of acceptable vehicles b) the practical working arrangements and c) the acceptable working hours for these.

APPENDIX A

Critique of EAS Transport Statement (All page numbers refer to their document)

Page 4

“Planning for the redevelopment of existing barn structures located on the land south of Three Houses Lane into 803sqm office use (Class E(g)(i), former B1 (a))”

Clearly this is wrong as the class quoted does not relate to the planning proposal. It also appears to have been wrongly used throughout the proposal, leading to irrelevant (and incorrect) conclusions.

Page 13 .Point3.1

...and is bordered in all directions by undeveloped land”

Incorrect. Our domestic property borders the applicant property

Page 13. Point 3.6

“Three Houses Lane forms a typical rural lane, measuring circa 5m in width”

Incorrect. For most of the 650m length to the proposed site it measures c4m. This is important because the inability to pass HGV type vehicles is key to the objection.

Page 13. Point 3.7

“The ATC was laid to the west of the site access point, between the access road and Rusling Lane”

This is the wrong point for measurement

- a) Virtually all the access to the site by the applicant is from the east, so the ATC would not have been triggered
- b) The chosen measuring point is a position where traffic would typically be slowing down for the junction ahead. The speeds would not have been indicative, therefore the subsequent calculations based on these incorrect

Page 13. Point 3.14

“There are thus key facilities to meet the needs of employees of the site during the day “

Unrealistic other than by car. The nearest shop is in Codicote, over 2miles away with a walking time estimated by Google Maps to 42 minutes. This journey would be primarily walking down the B656, which has no footpath, fast moving traffic and dangerous bends

Page 15. Point 3,.27 Traffic collisions

The EAS survey uses data from CrashMap. It suggests there have been” *no significant incidents*”. However, that same CrashMap data shows a serious incident on the B656

just north of the junction with Three Houses Lane. This is the junction we consider to be dangerous.

Furthermore, neighbours have recorded on a smartphone an incident involving a large articulated vehicle leaving the road as it tried to exit the applicant site (see previous picture). Other dangerous manoeuvres have been recorded on smartphones, including an articulated HGV backing out onto the B656 into oncoming traffic.

Page 16. Point 4.5

“To ensure that HGVs and delivery vehicles can utilise the access road simultaneously a passing point will be provided to ensure that no vehicles would need to stop within the public highway”

Utilising the on-site access road does not solve the issue of vehicles passing on the lane. The issue is not within the site, but within the 650m route to the B656. There are no proposals to deal with HGVs meeting other large vehicles on this route.

Page 16. Point 4.6

“The client is willing to commit to preparing and enforcing a traffic management scheme, inclusive of banksmen, to ensure that the proposed access arrangements have no detriment to the current functioning of the public highway”

It is difficult to imagine how such a scheme could be implemented. The fact is that when a large HGV travels to or from the site, other road users encountered will be affected whenever traffic is encountered.

Page 16. Point 4.7

As already pointed out above (Point 3.7). An inappropriate measuring point invalidates their speed calculations.

It does however (ironically) help identify residual traffic levels with site traffic, since the wrong measuring point used is after the predominant entrance route to the site. It shows much lower residual usage than the theoretical application data suggests (See Appendix C for methodology and calculations).

Page 18. Point 5.2

...“it is understood that agricultural and storage land uses can generate seasonal movements of a variety of vehicles, including but limited to tractors, trucks and occasionally large agricultural vehicles”

The applicant appears to suggest that a reduction in heavy vehicle traffic might arise given a reduction in agricultural traffic. In reality this site has never been used for any scale agricultural purposes. If one were cynical one might think it was conceived, by previous owners, as a scheme to ultimately get approval for the development of a domestic property (which it achieved). The usage was very light, supporting the local shoot and sub-letting storage to some local small businesses. I am unaware of any large agricultural vehicles being involved with the site. The suggestion that the new usages might decrease heavy vehicle traffic is a complete fiction,

Page 18 Trip Generation

The data traffic data used obviously inappropriate. The proposal is not “*Multi-modal*”, nor “*office*”, nor in a “*sub-urban area*”. Points 5.5 to 5.15 are therefore based on irrelevant data as thus have no credibility. A more ‘data-based’ approach is suggested in Appendix C, which indicates that the development brings with it a significant increase in traffic.

Page 6 (The EAS Conclusions).

Based on the above points of fact, I reject the following of their conclusions:

Point 6.1, Traffic proposals based on wrong usage class.

Point 6.2, The site is bordered by my property

Point 6.5, No proof that a traffic scheme is possible that will not impact current functioning

Point 6.6, Wrong location used for measurement

Point 6.7, Wrong usage class

Point 6.10. Based on their own speed data, they have measured pre-activity traffic levels. These contradict the statement that there is no significant impact on traffic levels

Point 6.11, The site has never been involved in major agricultural activity, so no benefit from reduction

Point 6.12, The impact of the introduction of HGVs onto Three Houses Lane has been profound and significant. Plenty of video evidence of an impact.

APPENDIX B

Traffic impact Analysis -Methodology.

1. The applicant has usefully provided data from a speed recording device placed to the West of the entrance to the site.
2. It is reasonable to assume that virtually all the site traffic will approach from the East (To approach from the West would involve a long journey through a series of twisty narrow lanes)
3. The recorder, placed primarily to record the speed of passing vehicles, therefore has in effect recorded only the non-site traffic, since site traffic
4. would have turned into the site before the device.
5. Using the same data point of peak entry traffic (9am-10pm) the data measured over a 7 day period had an average usage of vehicles travelling East of 10.4 vehicles. The proposal suggests that the peak movement of vehicles might be 7. However, with an anticipated staff level of 10 (all of whom are likely to travel by car given its inaccessibility to other forms of transport) and an expected Delivery vehicle traffic of 3 (3 in and 3 out) expected site traffic alone could be expected to be at least 13, not counting the other ancillary vehicles that might be associated with the site.

6. Based on the above the increase in traffic using their data would be $(13+10.4)/10.4 = 125\%$ increase. Not as stated in the application “...*would not be expected to comprise a perceptible impact...*”