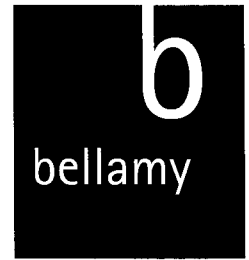


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Highway and Transportation Consultants

GDB/2665/6

November 2005



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**LONDON CONCRETE LTD**

**LAND AT CRANFORD WAY,  
FERME PARK, HORNSEY**

**PROOF OF EVIDENCE**

**G D Bellamy BSC CEng MICE**



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**GRAHAM DAVID BELLAMY will say:-**

I am a Chartered Engineer, a Member of the Institution of Civil Engineers, a Member of the Association of Municipal Engineers, with a degree of Bachelor of Science in Civil Engineering from the University of Leeds.

I am a Partner in Bellamy Roberts and I have over 35 years experience in traffic, transportation and highway engineering with consultants and in local government. The majority of my experience has been in the traffic and transportation fields, specialising in development implications, traffic management, public transport priority schemes, traffic calming, network and junction improvements. I have appeared as a witness at many public inquiries connected with development proposals, road improvement schemes, compulsory purchase orders etc.

Bellamy Roberts specialises in the traffic and transportation area, with particular emphasis on development related matters, and the practice operates throughout Great Britain and Northern Ireland, with clients from major public and private sector organisations.

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## 1.0 INTRODUCTION

1.1 My evidence deals with the highway and transport issues associated with the appeal by London Concrete Ltd into the failure of the London Borough of Haringey to determine the company's planning application for a concrete batching plant on former railway land at the Cranford Way Industrial Estate, Hornsey. The planning history relating to these proposals is set out in the evidence of Mr Woolner on behalf of the appellant company.

1.2 The planning application was accompanied by a Transport Assessment Report which I prepared, and I have been responsible for subsequent junction capacity testing requested by the Council's Officers during the course of their consideration of this application. I have also attended two public meetings in the local area.

1.3 Subsequent to the appeal being made, the Council's planning application sub-committee has considered the proposals and resolved that permission should be refused for three reasons, the first two of which relate to generated traffic movements. These are worded as follows:-

1. *Whilst aggregates would be brought to the site by rail, deliveries of cement to the site, and distribution of concrete from the site, would generate at least 56 lorry movements during the working day which would access the site from and exit on to Tottenham Lane via Cranford Way. Although this additional traffic may not place excessive strain on the capacity of the road network as a whole in this part of Haringey, it would result in disturbance to residents in nearby roads, in particular Tottenham Lane and Church Lane, to a degree which would unacceptably detract from the amenity of those residents. The proposal would thus be contrary to policies EMP 3.1 "Amenity, design and*

*transport considerations", RIM 3.2 "Pollution and nuisance from new development", and DES 1.9 "Privacy and amenity of neighbours" of the Council's adopted 1998 Unitary Development Plan, and to policy UD 2 "General principles" of the Council's 2004 draft Unitary Development Plan.*

2. *The additional traffic movements to and from the application site, and the nature of that traffic, would by reason of noise and dust generation be detrimental to the current operating and working conditions of properties in Cranford Way, which are of predominantly of a storage/light industrial character, rather than general industrial. The proposed development would discourage businesses from locating in Cranford Way and may lead to some occupiers moving out of their existing premises. This would lead to a net reduction of jobs in the Defined Employment Area which would not be offset by the proposed creation of 12 jobs at the new plant. The scheme would therefore be contrary to policies EMP 3.1 "Amenity, design and transport considerations", RIM 3.2 "Pollution and nuisance from new development", and DES 1.9 "Privacy and amenity of neighbours" of the Council's adopted 1998 Unitary Development Plan, and policies EMP 5 "Promoting employment uses" and UD 2 "general principles" of the Council's draft Unitary Development Plan.*

1.4 In considering these proposals the Council has taken advice from transport consultants Steer Davies Gleave (SDG) who reported to the Council in a letter dated 31 August 2005. In addition, a local pressure group known as Green N8, has considered these proposals and their views on a number of aspects were reported to the Council's sub-committee.

1.5 My evidence takes account of matters raised by SDG and Green N8 but focuses on the Council's stated reasons for refusal. I therefore assess the impact of the

proposed development in terms of the effect of generated traffic on capacity at the junction of Cranford Way with Tottenham Lane, and the junction of Tottenham Lane with Church Lane. I then consider the potential impact of this additional traffic on road safety and on amenity for local residents and pedestrians, having regard to the Guidelines for the Environmental Assessment of Traffic produced by the Institute of Environmental Assessment and Management.

## **2.0 SITE LOCATION AND PROPOSALS**

2.1 As set out in the description, the application is for a concrete batching plant on former railway sidings at the Cranford Way Industrial Estate. The key factor regarding the site location is that it enables the development to be rail-fed so that all incoming aggregates will be supplied by rail, thereby saving very substantial road mileage compared with the alternative of delivering aggregate by heavy goods vehicle (HGV).

2.2 The proposal is that there will be five concrete mixer trucks based at the site distributing pre-mixed concrete to the local area. Initially, cement will be delivered in articulated tanker lorries with up to three deliveries per day, but within a relatively short timescale it is anticipated that all cement will also be delivered by rail.

2.3 The plan attached as **Appendix 1** is an enlarged extract from the Ordnance Survey 1:50,000 scale mapping showing the location of the site in relation to the principal road network in the area. This plan shows that the site is located on the former railway sidings south of Hornsey Station, and access is via a private industrial estate road called Cranford Way. This joins the public highway network on the section of Tottenham Lane which is one-way westbound, as part of a traffic gyratory system to the west of Hornsey Station. This gyratory

system encompasses Tottenham Lane, Church Lane and High Street. Tottenham Lane is classified A103 and High Street is classified A504.

- 2.4 Cranford Way is a private estate road to industrial and warehousing units located on former railway land. The layout is relatively informal, with large forecourt areas either side of the concrete carriageway which provides the route through the estate. The general layout is shown in more detail on the plan at **Appendix 2**.
- 2.5 At the southern end of Cranford Way, the road turns through a right-angled bend and it is at that point that the appeal site will take access, as shown on the plan at Appendix 2.
- 2.6 From that right-angled bend, Cranford Way continues westwards for a short distance before turning through another right-angled bend around the rear of existing warehouse units. It then proceeds northwards along the rear of those units before rejoining the main spine road through the estate, approximately halfway along its length. At the northern end of this western limb of Cranford Way there is a 'No Entry' sign facing southbound traffic, so that this western limb effectively operates as one-way northbound for traffic generated along the length of Cranford Way, between the site access and that 'No Entry' sign.
- 2.7 The rear of residential properties in Uplands Road overlook the western limb of Cranford Way.
- 2.8 For the avoidance of doubt, the traffic circulation pattern in Cranford Way is as follows. Between its junction with Tottenham Lane and the London Concrete appeal site access, the eastern limb which provides the principal access to all of the units on the estate, operates as a two-way road and the wide carriageway is more than adequate for that purpose. Beyond the appeal site access, the western arm of Cranford Way involves vehicles travelling around a very tight right-

angled bend at the corner of the end warehousing unit and it is only that end unit which generates any vehicular activity on the western arm. It operates one-way northbound as an exit only from the estate, but is clearly used only by those vehicles which have parked on the western arm itself.

- 2.9 For traffic accessing the units served from the eastern arm of Cranford Way, and that includes the appeal site, it is inconceivable that drivers would choose to make the difficult manoeuvres around the rear of the end warehouse unit to exit the site via the western arm. They all use the eastern arm of Cranford Way and therefore do not pass the rear of the residential properties in Uplands Road.
- 2.10 The units on the estate are occupied by a mix of companies, primarily in storage and distribution businesses, although there is some manufacturing. At the northern end of the estate there is a large food processing company occupying buildings on both sides of Cranford Way. This is a major traffic generator.
- 2.11 The plan at **Appendix 3** shows the road network in the local area in more detail. Cranford Way takes access from Tottenham Lane, classified A103 as previously described. This section of Tottenham Lane is one-way southwest bound (I subsequently refer to this as westbound for simplicity) and car parking is permitted on both sides throughout most of its length. However, with a carriageway width of approximately 9m, the car parking does not create any obstruction to through traffic, even for large vehicles.
- 2.12 There are footways on both sides of Tottenham Lane and this section of the road has a mixed-use character. Hornsey rail station is towards the eastern end of the road and there are a number of commercial properties between there and Cranford Way, including builders' merchants and other industrial type uses. There is a Royal Mail sorting office on the opposite side of the road. West of Cranford Way, there are a number of other commercial premises, but the frontages become predominantly residential, with a community centre almost

opposite the Cranford Way junction. A children's nursery operates from those premises.

- 2.13 In the vicinity of its junction with Church Lane, there are a number of retail premises on Tottenham Lane, with residential floors above, and these continue to the south of that junction, where the road becomes 2-way.
- 2.14 Church Lane operates one-way northbound, from its junction with Tottenham Lane to a traffic signal controlled junction with High Street. The frontages are primarily residential although there are properties in commercial use, and a police station, in the vicinity of the junction with Tottenham Lane. As with Tottenham Lane, on-street parking is permitted for much of its length but this does not obstruct the passage of even large vehicles.
- 2.15 High Street is classified A504 and forms part of the busy route between Wood Green and Muswell Hill. Generally speaking parking is not permitted, and the frontages are of mixed use, albeit predominantly residential.
- 2.16 Local objectors have expressed concern about the possibility of traffic generated by the development rat-running through the network of roads east of the railway line. These are known as the "ladder roads" and lie between Green Lanes (A105) and Wightman Road.
- 2.17 Green Lanes is a busy road, being one of the principal north-south routes in this part of north London. The "ladder roads" lie between Green Lane and the railway tracks and are overwhelmingly residential in nature. Wightman Road is classified as B138 but is also residential in character, and is two-way.
- 2.18 All of the interconnecting roads between Wightman Road and Green Lanes are one-way, in alternate directions. All of them are traffic calmed with road humps and some also have kerb build-outs. Most of the junctions are narrowed down

with very tight radii to deter their use by through traffic. All of these roads have car parking along both sides, the majority of which is for resident permit holders.

- 2.19 Because of the car parking and the tight radii at the junctions it is difficult for HGVs to pass along them. All of the “ladder roads”, and Wightman Road, are subject to a 7.5 tonne weight restriction (except for access). This would make it illegal for the mixer trucks associated with the appeal proposal to use the “ladder roads” as a rat-run.

### **3.0 FREIGHT POLICY**

- 3.1 It is clear that there has been a consistent thread running through Government policy pronouncements from publication of its Transport White Paper in July 1998, in respect of encouraging the transfer of freight from road to rail in order to ease road congestion and reduce the environmental impact of freight transport by road.

- 3.2 Mr Woolner sets out in his evidence the various transport policies and strategies which the Government have developed since 1998, and whilst I do not repeat these in my evidence I do rely upon them in forming my conclusion that these proposals are fully supported by transport policy at both national and local levels. Accordingly, in this section of my evidence I highlight the most recent relevant guidance.

- 3.3 PPG13 is the current specific planning guidance relating to transport and this picks up the threads of the Governments’ objectives for transferring freight from road to rail and sets out relevant advice. In addition, the Mayor has set out a Transport Strategy for London and this deals specifically with rail freight. Finally I refer to a recent Statement by the Transport Secretary.

### **PPG13**

3.4 The current version of PPG13 was published in March 2001 and paragraph 4 sets out the objectives of the guidance as follows:

4. *The objectives of this guidance are to integrate planning and transport at the National, Regional, Strategic and Local Level to:*

- *Promote more sustainable transport choices for both people and for moving freight;*
- *Promote accessibility to jobs, shopping, leisure facilities and services by public transport; walking and cycling, and*
- *Reduce the need to travel, especially by car*

3.5 Paragraph 45 of the PPG sets out the basic approach in policy terms to freight movements and contains the following:

*The Government has set out its policy framework on freight in its sustainable distributions strategy (March 1999). While road transport is likely to remain the main mode for many freight movements, land use planning can help to promote sustainable distribution, including where feasible, the movement of freight by rail and water.....*

3.6 Paragraph 47 continues:

*Minerals can only be worked where they are found and the transport of minerals and spoil, as well as material for landfill sites can have significant environmental impact. Local Authorities should seek to enable the carrying of material by rail or water wherever possible, .....*

3.7 It is clear from these quotations from PPG13 that Government policy seeks to encourage the use of rail for freight transport, particularly of bulk materials such as minerals (i.e. aggregates used for concrete production).

*The Mayor's Transport Strategy for London*

- 3.8 Freight movements are dealt with in Chapter 4 of the Mayor's Transport Strategy, a document published in July 2001. Dealing specifically with rail freight, proposal 4K.5 is as follows:

*Transport for London will work with the Strategic Rail Authority and the London Boroughs to help ensure suitable sites and facilities are made available to enable the transfer of freight to rail, both through the development of existing sites and the provision of new ones.*

*Recent Government Statement*

- 3.9 Most recently, the Government has updated its overall transport strategy and the White Paper entitled The Future of Transport was published in July 2004. This continues the theme of encouraging the transfer of freight from road to rail wherever possible.

- 3.10 At **Appendix 4** I attach a Statement to Parliament by the Transport Secretary, Alistair Darling which was delivered on 19<sup>th</sup> July 2005. This contains a number of highly pertinent quotes which I have highlighted and demonstrates the Government's commitment to maximising the opportunities to encourage the movement of freight by rail. The need for the planning system to play its part in this is clear from the sections highlighted.

*Summary*

- 3.11 It is clear from the above that the aim of transport policy is to encourage positively the transfer of bulk freight from road to rail. Such policies are directly applicable to this appeal because the development will allow concrete to be produced for the local area around the site utilising a plant which enables all incoming aggregates to be delivered by rail. The proposals are therefore fully supported by national transport policies.

#### 4.0 BASELINE TRAFFIC DATA

- 4.1 The Transport Assessment report which was submitted with the planning application was based upon traffic surveys carried out in March 2003, immediately prior to the appellant company's original planning application for the proposed development on this site. In order to provide up-to-date figures for this appeal and to respond to supplementary questions raised by the Council during their consideration of the application, these surveys were repeated on Tuesday 20<sup>th</sup> September 2005. However, for reasons which I expand upon later in my evidence, it is relevant to summarise the results of the March 2003 survey.
- 4.2 That survey recorded through traffic movements along Tottenham Lane past the Cranford Way junction, and also recorded turning movements into and out of Cranford Way during the 12-hour period 7.00a.m. - 7.00p.m. The junction turning count was fully classified into different vehicle categories.
- 4.3 The results of that survey can be summarised as follows. During the 12-hour period, there was a total of 994 movements into and out of Cranford Way, of which 264 were HGV movements (i.e. 26.6% of the total). Closer examination of the figures revealed that there was a significant difference between the inbound and the outbound totals which indicated that one or more users on the estate gave rise to significant volumes of traffic movement prior to 7.00 a.m. Utilising a second survey taken within the estate, it is apparent that this was due to the meat processing company at the front of the site.
- 4.4 During the same 12-hour period, there was a total of 6225 through movements along Tottenham Lane, of which 501 were HGVs and buses.

4.5 Comparison of the figures for Cranford Way and for Tottenham Lane shows that traffic into and out of the Cranford Way estate accounted for less than 10% of the total traffic in Tottenham Lane.

4.6 As I have previously indicated, we repeated this survey on Tuesday 20<sup>th</sup> September 2005 in order to update the figures. The results of that survey are set out at **Appendix 5** which gives the results for both the 12-hour period 7.00a.m - 7.00p.m. and the morning and evening peak hours.

4.7 Comparing the 12-hour count from September 2005 with the equivalent count from March 2003 there are a number of differences as detailed in Table 1 below.

**Table 1**  
**Comparison of Survey Data 2003/2005**

| Road                                     | March 2003 |         | September 2005 |         |
|--|------------|---------|----------------|---------|
|  | Total Flow | HGV+Bus | Total Flow     | HGV+Bus |
| Tottenham Lane<br>(West of Cranford Way) | 6794       | 655     | 7128           | 394     |
| Cranford Way                             | 996        | 264     | 939            | 122     |

4.8 In terms of total traffic volumes, the flow along Tottenham Lane increased by 334 movements between 2003 and 2005 which is an increase of 5%. However, the number of HGV and bus movements dropped from 655 to 394, a drop of 261.

4.9 On Cranford Way the total flow of traffic dropped by about 6% but the number of HGV movements dropped from 264 to 122, a reduction of 142 movements. I comment on the significance of these changes later in my evidence.

4.10 As part of their consideration of this application, the Council requested us to carry out an assessment of the impact of traffic generated by the proposed development upon capacity at the junction of Tottenham Lane and Church Lane. In order to do this, it was necessary to carry out peak hour traffic surveys at that junction and these were conducted at the same time as the Tottenham Lane/Cranford Way survey (i.e. 20<sup>th</sup> September 2005). The results of the surveys for the Church Lane junction are set out in diagrammatic form at **Appendix 6**.

4.11 A comparison of the peak hourly flows shown in Appendix 5 and Appendix 6 shows that the flows in Tottenham Lane and Church Lane are of a broadly similar order when due allowance is made for the directional split, which is predominantly southbound in the morning peak and northbound in the evening peak. The Church Lane survey also shows that only a small proportion of the Tottenham Lane traffic (less than 10%) turns right from Tottenham Lane into Church Lane.

## **5.0 TRAFFIC GENERATION**

5.1 The appeal site has been selected because it is on former railway sidings which enables London Concrete to receive delivery of all the aggregates (including sand) by rail in accordance with their normal practice. As Mr Casey describes in his evidence, the company envisages that this plant will consume approximately 110,000 tonnes of aggregate per annum which would otherwise give rise to 11,000 lorry movements but because of the rail connection, it will generate no traffic movements on the highway network associated with aggregate deliveries. Furthermore, those movements would be long-distance trips, from Leicestershire and Kent, so that the rail connection for aggregate supplies will save a total of circa 1,567,500 lorry miles per annum which would otherwise occur.

5.2 The fact that the proposed plant will be rail-fed for incoming aggregates represents a significant benefit in PPG13 terms for the wider area of north London, as well as nationally. It must be understood that concrete batching plants do not generate demand for the product. That demand is generated by construction work, and if the concrete is not to be supplied from the appeal site, it will come from another company's existing plant elsewhere, the majority of which are not rail-connected and generate HGV traffic for the supply of inbound aggregates. Alternatively, if London Concrete supply this local area from one of their other plants, it involves excessive mileage by mixer trucks across this part of London, which again is contrary to the sustainability objectives set out in PPG13.

5.3 Cement is not currently transported by rail and for the volumes envisaged at this plant, it is likely that there will need to be up to three deliveries per day, which will normally occur in articulated tankers. However, the cement producers are currently working with the rail industry to enable cement to be transported by rail to plants such as that proposed for the appeal site. It is anticipated that this will occur within a relatively short space of time (say, 2 years), after which all cement deliveries to the site will be by rail. That will then reduce the HGV movements I have utilised for the calculations in my evidence.

5.4 The finished product will be delivered into the local market. Responsible concrete producing companies find that it is difficult to serve an area more than about four radial miles from the site because of the quality issues associated with delays. Accordingly, it is envisaged that there will be five mixer trucks based at the site and that each truck will normally carry out an average of five loads per day. On average, therefore, the site will generate some twenty-five loads of mixed concrete for distribution into the area, which gives rise to 50 HGV movements per day.

- 5.5 Taken together with three cement deliveries per day, the total HGV generation by the company will therefore be an average of 56 movements per day.
- 5.6 In addition, a small number of customers do come to the plant to collect their own concrete. Usually these are small builders collecting a relatively small load, typically 1cum. (compared with 8cum. in a mixer truck), and this is normally transported in a small flat-bed pick up vehicle. Mostly, these are smaller than HGVs.
- 5.7 The company's records from other similar plants show that these customer collections average 2.5 loads per day. As I have said, they are not normally classified as HGV movements, but for the purposes of this appeal, I have added an additional 6 HGV movements per day (i.e. 3 loads) to allow for this activity.
- 5.8 The total HGV activity associated with the proposed plant will therefore be 62 movements per day.
- 5.9 It is anticipated that the development will create twelve jobs which includes the drivers of the five mixer trucks. Experience from the company's other plants shows that not all of the employees drive to work in their own car, and the location of this site, adjacent to Hornsey rail station, and convenient for the frequent bus services along Tottenham Lane, means that there are ample opportunities for employees to travel by other means. Accordingly, it is unlikely that the application will give rise to more than about eight employees driving to work, giving rise to no more than say, 20 car movements over the day as a whole.

## 6.0 ROAD SAFETY

- 6.1 During consideration of the appeal proposals, the Council's officers have asked for a detailed appraisal of personal injury accidents which have occurred in the vicinity of the site. I attach a plan at **Appendix 7** which shows the area encompassed by Tottenham Lane, Church Lane and High Street and marked on that plan are the locations of personal injury accidents which have occurred during the three year period to the end of March 2005. (This information has been provided by the London Accident Analysis Unit.) At Appendix 7 I also attach a table which summarises the accidents identified on the attached plan giving a brief description of the location, a description of the vehicles involved and the manoeuvres being undertaken, together with any other pertinent comment.
- 6.2 The information speaks for itself and it is apparent that there is no particular pattern to the nature of the accidents which have occurred. That in itself suggests that there is no particular road safety problem in this area of the local network.
- 6.3 What can be concluded from these accidents is that none of them have occurred at the junction between Cranford Way and Tottenham Lane, none of the accidents have involved heavy goods vehicles, and none of the accidents have involved child pedestrians or child cyclists.
- 6.4 Many of the local objectors to this proposal have raised concerns about road safety and have drawn attention to the location of the children's nursery close to the junction of Cranford Way on Tottenham Lane. It has been suggested that children are at particular risk from additional HGV traffic likely to be generated by the appeal proposals. However, the accident records demonstrate that notwithstanding the existing number of HGVs and buses (which are of a similar

size and weight to an HGV) there have been no accidents over the last three years involving child pedestrians with any vehicle, let alone an HGV.

6.5 Green N8, representing a number of local objectors, have stressed their concerns about the impact of this development on road safety, and they assert that HGVs are involved in a disproportionate number of fatal and serious accidents, particularly involving cyclists.

6.6 I have examined the accident statistics for London in detail to check the relationship between HGVs and cycle accidents. This shows that for the 3 years 2002-2004, HGVs were involved in just 2% of all cycle injury accidents, whereas HGVs represent approximately 5% of total traffic. This shows that they are, in fact, involved in proportionately fewer cycle accidents than other vehicle types.

6.7 That is consistent with overall statistics which show that HGVs have the lowest injury accident rate per kilometre of all vehicles. Indeed, data from the London Accident Analysis Unit shows that in the London Borough of Haringey in 2004, there were only 14 accidents involving HGVs. That was out of a total of 1442 accidents that year, so that HGVs were involved in less than 1% of all accidents. It is clear that HGVs are not a major source of accidents in the Borough.

6.8 I therefore conclude that there is no basis to suggest that the additional movements generated by the appeal proposals are likely to give rise to unacceptable road safety problems in this area.

## 7.0 HIGHWAY CAPACITY

7.1 During consideration of the planning application the Council requested analysis of the impact of the proposed development on junction capacity at Cranford

Way/Tottenham Lane and Church Lane/Tottenham Lane. This analysis was carried out utilising the figures collected during the September 2005 traffic surveys and was provided to the Council prior to consideration of the application by the subcommittee.

7.2 In order to assess the impact of the development on capacity at these junctions, it is first necessary to assess the number of vehicle movements likely to occur during the morning and evening highway network peak hours. It is difficult to be precise about the proportion of the total daily movements which might occur during those peak periods because that depends upon the vagaries of demand from day to day.

7.3 However, on average, the company finds that it takes approximately 2 hours for each vehicle to be loaded with concrete, to travel to the destination, unload, and return to the batching plant. That is why each vehicle achieves no more than an average of about 5 loads per day.

7.4 It is also the case that only one vehicle can be loaded at a time at the batching plant and this means that it would be unlikely for all 5 vehicles based at the plant to exit the site in a one hour period.

7.5 On that basis, for the purposes of the highway network capacity calculations I have assumed the following traffic movements generated by the development as set out in Table 2 below.

**Table 2  
Generated Traffic**

| Junction     | a.m. peak |       |       | p.m. peak |       |       |
|--------------|-----------|-------|-------|-----------|-------|-------|
|              | Cars      | HGV   | Total | Cars      | HGV   | HGV   |
| Cranford Way | -         | 3 in  | 3 in  | -         | 3 in  | 3 in  |
|              |           | 3 out | 3 out | 3 out     | 2 out | 5 out |
| Church Lane  | -         | 3 in  | 3 in  | -         | 5 in  | 5 in  |
|              |           | 3 out | 3 out | 4 out     | - out | 4 out |

### Tottenham Lane/Church Lane Junction

7.6 This is an unusual layout with a number of different turning movements taking place. Accordingly, it was analysed using PICADY on the basis that it comprises two separate junctions:

- (a) A right turn T-junction out of Tottenham Lane into Church Lane (North).
- (b) A ghost island T-junction with Tottenham Lane as the north/south through route, Church Lane as the south/north through route and Rathcoole Avenue as the minor arm.

7.7 The PICADY printouts for junction (a) are included at **Appendix 8** and for junction (b) at **Appendix 9**. The results of the analysis are summarised in Tables 3 and 4 respectively as set out below:

**Table 3**  
**Summary of PICADY Analysis**  
**Tottenham Lane Right Turn to Church Lane**

|                                | Existing |             |       |             | With Development |             |       |             |
|--------------------------------|----------|-------------|-------|-------------|------------------|-------------|-------|-------------|
|                                | a.m.     |             | p.m.  |             | a.m.             |             | p.m.  |             |
|                                | RFC      | Q<br>(vehs) | RFC   | Q<br>(vehs) | RFC              | Q<br>(vehs) | RFC   | Q<br>(vehs) |
| Right turn from Tottenham Lane | 0.182    | 0.2         | 0.111 | 0.1         | 0.191            | 0.2         | 0.118 | 0.1         |

[NB: Capacity is RFC=1]

**Table 4**  
**Summary of PICADY Analysis**  
**Tottenham Lane/Rathcoole Avenue**

|                                | Existing |             |       |             | With Development |             |       |             |
|--------------------------------|----------|-------------|-------|-------------|------------------|-------------|-------|-------------|
|                                | a.m.     |             | p.m.  |             | a.m.             |             | p.m.  |             |
|                                | RFC      | Q<br>(vehs) | RFC   | Q<br>(vehs) | RFC              | Q<br>(vehs) | RFC   | Q<br>(vehs) |
| Exit from Rathcoole Ave.       | 0.050    | 0.1         | 0.091 | 0.1         | 0.051            | 0.1         | 0.091 | 0.1         |
| Right turn into Rathcoole Ave. | 0.010    | -           | 0.030 | -           | 0.010            | -           | 0.030 | -           |

[NB: Capacity is RFC=1]

7.8 It is clear that there is absolutely no capacity issue at either of these junctions which currently operate with very low ratios of flow to capacity (RFC) and, effectively, no queueing. The effects of traffic generated by the proposed development result in no material change to those circumstances.

**Tottenham Lane/Cranford Way Junction**

7.9 The PICADY printouts for this analysis are contained at **Appendix 10** and the results are summarised in Table 5 below.

**Table 5**  
**Summary of PICADY Analysis**  
**Tottenham Lane/Cranford Way**

|           | Existing |             |       |             | With Development |             |       |             |
|-----------|----------|-------------|-------|-------------|------------------|-------------|-------|-------------|
|           | a.m.     |             | p.m.  |             | a.m.             |             | p.m.  |             |
|           | RFC      | Q<br>(vehs) | RFC   | Q<br>(vehs) | RFC              | Q<br>(vehs) | RFC   | Q<br>(vehs) |
| Left turn | 0.145    | 0.2         | 0.076 | 0.1         | 0.158            | 0.2         | 0.089 | 0.1         |

[NB: Capacity is RFC = 1]

7.10 Again, it is evident that there is absolutely no capacity problem with this junction at present and the proposed development will have no material impact on that position.

**8.0 ASSESSMENT OF IMPACTS**

8.1 The Council’s reasons for refusal recognise that the development “may not place excessive strain on the capacity of the road network as a whole in this part of Haringey”. That view is confirmed by the capacity analysis in the preceding section of my evidence and by the Council’s own consultants (SDG). What the Council do allege is that the development traffic will give rise to disturbance for

residents in nearby roads and be detrimental to working conditions in properties in Cranford Way. I therefore address these issues in this assessment section of my evidence.

- 8.2 In order to set any assessment of the impact of traffic generated by the appeal proposals into its proper context, it is necessary to consider potential alternative use of the sites.
- 8.3 The majority of the site lies within a Defined Employment Area (DEA5) as annotated on the proposals map of the Revised Deposit Consultation Draft UDP. I enclose an extract from that proposal map annotated with the site boundary at **Appendix 11**. My understanding is that these employment areas are considered suitable for employment uses of various types, other than large freestanding offices.
- 8.4 Mr Woolner deals with the implications of this allocation in his evidence. It is clear from para 5.17 of the Plan that the Council identifies the Cranford Way Industrial Estate as a location where it is appropriate to accommodate general industrial and warehousing activities which may have detrimental impacts in terms of amenity and neighbouring uses. Whilst I do not accept that the appeal proposals will have any such impacts, the Council's approach establishes a context for assessment of the significance of any impacts which do arise. It also sets a context for the type of alternative use which could be appropriate on the appeal site.
- 8.5 Given the nature of the existing Cranford Way Industrial Estate and the allocation it is entirely appropriate that the appeal site could be developed for some form of commercial warehousing. Indeed, that is the predominant use amongst existing occupiers. Such a use would have its own traffic generation characteristics and these should form part of the background against which the appeal proposals are considered.

- 8.6 In order to make an assessment of the potential generation from this allocated use of the site, I have examined the characteristics of commercial warehousing using the TRICS database (TRICS5-2005b). The area of the appeal site which is covered by the allocation in the Deposit Review UDP is approximately 0.3 hectares. For this kind of land use, the built floorspace is typically 40% of the site area which gives a potential floorspace of 1,200 square metres.
- 8.7 I enclose a print-out from the TRICS database at **Appendix 12**. This shows that a typical warehousing development of that scale would, on average, give rise to 66 vehicle movements per day of which 38 would be by HGVs. There are a number of comments to be made about this.
- 8.8 Firstly, the total traffic flow is broadly similar to that associated with the appeal proposals. Secondly, although the number of HGVs is only about 60% of the figure for the appeal proposals it is clear that this alternative use could give rise to significant levels of HGV activity. It is also apparent from the TRICS data that this kind of use has the potential to generate that traffic throughout the twenty-four hour period, whereas the appeal proposals are limited to the normal working day. Indeed, the TRICS data indicates an HGV peak hour of midnight to 1.00a.m. for this use.
- 8.9 My overall conclusion, therefore, is that the development of this land in accordance with the allocations set out in the Revised Deposit Consultation Draft UDP could give rise to traffic generation characteristics which would have a generally similar impact on traffic capacity and on amenity as the appeal proposals.
- 8.10 The use of this railway land for the importation of aggregates by EWS (the rail freight operator) is permitted development, which would therefore not require planning permission. A second alternative use as an aggregates depot is therefore an appropriate consideration, and one which would be four-square

with the various policy objectives of maximising the use of rail for transport of bulk materials (such as aggregates), and protecting rail-connected sites for developments taking advantage of the rail connection.

- 8.11 The volume of material which an aggregate depot might handle directly affects its traffic generation. Assuming that all outgoing material was distributed in 20 tonne payloads a throughput of some 170,000 tonnes per annum would give rise to a similar number of HGV movements as the appeal proposals. That is a perfectly feasible throughput for a depot and could be achieved with no more than about 3 train deliveries per week.
- 8.12 Use of the appeal site as an aggregates depot is therefore a second alternative use, and one which could easily give rise to similar or greater numbers of HGV movements as the appeal proposals.
- 8.13 There is a further aspect to this consideration. The September 2005 traffic survey revealed some differences, particularly in HGV flows, compared with the March 2003 survey. During the intervening period, TNT the parcel distribution operator who occupied one of the largest units on the estate in March 2003, moved out, and that unit was (and remains) vacant in September 2005. The TNT operation was a substantial one and involved a significant number of HGV movements.
- 8.14 It can be seen from Table 1 that between March 2003 and September 2005 total daily traffic on Cranford Way declined by 57 movements, with a reduction of 142 HGV movements. The appeal site generation will amount to 82 movements of which 62 will be HGV. The addition of that to the September 2005 flows will result in a small increase in total flows (25 movements) compared with March 2003, but the HGV total of 184 movements (122 existing plus 62 generated) will remain well below the level it was at in March 2003.

8.15 In my view, it is simply not possible, therefore, to argue that traffic from the appeal proposals will create a material change in the amenity of the estate, sufficient to deter existing or potential future occupiers. Traffic levels will, in fact, remain lighter than they were in 2003 before London Concrete became involved with the site.

8.16 Notwithstanding this conclusion, I have, as a worst case, examined the appeal proposals against the nil-use position for the appeal site by testing the anticipated traffic generation against the baseline traffic flows obtained in recent surveys.

**The Council's First Reason for Refusal**

8.17 The Council's first reason for refusal alleges that traffic generated by the appeal proposals would result in disturbance to residents on nearby roads, in particular Tottenham Lane and Church Lane, to a degree which would unacceptably detract from the amenity of those residents.

8.18 The reason for refusal does not identify in what respect the amenity of those residents would be disturbed, although the summary of the Council officers' recommendations to the planning subcommittee indicated that the disturbance would arise from noise nuisance and vibration, and the stirring up of additional dust. Mr Sharps deals with noise, nuisance and vibration, and Mr Grant with the question of dust, but I consider the actual increases in traffic flows which will result from the appeal proposals on those roads and this forms the basis of Mr Sharps' and Mr Grant's subsequent analysis. I also consider the issue of disturbance to amenity as a result of this traffic from a more general perspective.

8.19 Table 6 below shows the existing 12-hour traffic flows on the identified sections of the local highway network with total traffic flows and the HGV component (including buses) shown in parenthesis alongside. Table 6 also shows the

anticipated increase in those movements as a result of the proposed development.

**Table 6**  
**Comparison Existing and Future 12-hour Traffic Flows**

| Road Link                           | Existing Flow | Future Flow | % Increase |
|-------------------------------------|---------------|-------------|------------|
| Tottenham Lane east of Cranford Way | 7001 (378)    | 7042 (409)  | 0.6 (8.2)  |
| Tottenham Lane west of Cranford Way | 7128 (394)    | 7169 (425)  | 0.5 (7.9)  |
| Tottenham Lane south of Church Lane | 11760 (546)   | 11776 (558) | 0.1 (2.2)  |
| Church Lane                         | 5520 (194)    | 5545 (213)  | 0.5 (9.8)  |

NB: Figures in ( ) are HGV & Buses contained in overall total

- 8.20 It is evident from Table 6 that the changes in overall traffic flow are so marginal that they can have no impact on residential amenity.
- 8.21 With regard to the changes in HGV traffic flows, these vary between about 2% in the 2-way section of Tottenham Lane west of its junction with Church Lane, through increases of about 8% in the one-way section of Tottenham Lane between High Street and Church Lane, to an increase of 9.8% in the HGV flow along Church Lane itself.
- 8.22 Guidelines published by the Institute of Environmental Assessment and Management, an extract from which is attached at Appendix 13, indicate that further consideration of the environmental impact of traffic is not normally justified where increases in traffic flow are less than 30%, either in total flow, or when considering HGV activity alone. Even in especially sensitive circumstances changes in traffic flow of less than 10% are not sufficient to justify further consideration of environmental impacts. That advice reflects the

fact that such small changes are generally less than the accuracy of either the baseline traffic surveys or the forecasts for any changes in traffic flow, as well as the fact that the daily variation of traffic flows is normally plus or minus 10%.

8.23 It is also important to understand that these levels of change are identified as scoping thresholds above which it may be necessary to consider potential environmental impacts in more detail. Explicitly, they are not thresholds above which environmental harm can be anticipated.

8.24 In this case, all of the changes lie below the 10% threshold and therefore the guidance indicates that more detailed consideration of potential environmental impacts is not justified. Nevertheless, it is instructive to consider a couple of amenity issues which commonly arise from increases in traffic flow in order to demonstrate why that is the case in this instance.

8.25 Mr Sharps deals with noise impacts in more detail, but in general terms it is necessary for total traffic flows to double in order to create an increase in traffic noise of 3dB(A). It is generally accepted that most people are unlikely to perceive changes in noise levels less than 3dB(A). It requires a change in traffic flow of approximately 26% to give rise to a 1dB(A) change in noise level and, even in laboratory conditions, most people are unable to detect changes smaller than that.

8.26 Another common concern relating to increases in traffic flow is the severance effect which that flow can have between two parts of any street. The increase in traffic flow reduces the gaps between vehicles, thereby making it harder to cross the road for pedestrians, and, eventually, once increases become sufficiently large there is an increased visual impact arising from the presence of the additional vehicles.

8.27 In this case, the traffic flows in total will change by no more than about 0.5% (or 41 movements in a total of over 7,000 over 12 hours) and it is clear that such changes would not have any material effect on severance. Although the changes in HGV flows increase by up to 9.8%, that change must be set in the context of the overall flow of traffic.

8.28 The greatest change in HGV content will be in Church Lane. At present, there is a traffic flow of 5520 vehicles per 12-hour day of which 194 are HGVs. The HGVs therefore represent some 3.5% of the overall traffic flow. As a result of the proposed development the total flow increases to 5545, of which 213 will be HGVs. The future HGV component of the total traffic will therefore be 3.8%.

8.29 It is simply not credible to argue that anybody standing at the side of the road would detect changes, either in the total volume of traffic at such low levels, or in the mix of that traffic arising out of the change of the number of HGVs.

8.30 It is for these reasons that I conclude that the changes in traffic flow arising out of the appeal proposals will have no perceptible impact on the amenity of residents in nearby roads. For that reason, I do not accept that the development would be contrary to the policies listed in the Council's first reason for refusal.

#### **The Council's Second Reason for Refusal**

8.31 The Council's second reason for refusal alleges that the nature of the traffic movements generated in Cranford Way will give rise to noise and dust generation which will be detrimental to the operating and working conditions of other properties in the estate. It is said that this would discourage businesses from locating in the estate and may lead some existing occupiers to leave.

8.32 The September 2005 traffic survey shows a total traffic flow of 936 vehicles per day on Cranford Way at its junction with Tottenham Lane, of which 122 were HGVs. The proposed development will generate a total daily traffic flow of

82 movements of which 62 will be HGVs. The change in total traffic therefore represents less than a 10% increase on the existing flows in Cranford Way, although the increase in HGVs represents an increase of about 50% in the existing HGV flow.

8.33 However, as I have described in paras 8.13-8.15 of my evidence, that change falls within the levels of HGV activity which existed in Cranford Way at the time of the March 2003 traffic survey. In other words, the total HGV activity in the estate as a result of the proposed development will be entirely consistent with what might be expected from an industrial estate of this nature, and that view is supported by the fact that the levels of HGV movement are less than has existed in the past.

8.34 This argument is further supported by the arguments set out between paragraphs 8.3 and 8.12 of my evidence which relate to the potential alternative uses of the appeal site. It is entirely likely that an acceptable alternative use of the appeal site would give rise to HGV traffic movements of a broadly similar level to the appeal proposals.

8.35 The Council's second reason for refusal asserts that the existing occupiers in Cranford Way are predominantly of a storage or light industrial character.

8.36 One of the largest units on the estate, as previously described, was occupied by TNT which is a parcel distribution operation. A large unit opposite the former TNT unit is currently occupied by a newspaper distribution operation which generates significant volumes of HGV activity. It is also known from the March 2003 surveys that the meat processing company generated at least 120 HGV movements during the day of that survey, a figure effectively twice what the appeal site is expected to generate.

8.37 It seems to me, therefore, that the Council's description of the existing occupiers of this industrial employment area is potentially misleading in that it does not fully reflect the types of user who currently occupy units on the estate or who could occupy the appeal site if developed in accordance with the UDP allocation.

8.38 I therefore conclude that the Council's second reason for refusal is misconceived in that it does not fully reflect the way in which this estate has operated in the very recent past, and could operate in the future, irrespective of the appeal proposals. For that reason, it cannot be argued that the development is contrary to the policies set out in that second reason for refusal.

8.39 In the preceding paragraphs of this section of my evidence I have dealt with the issues raised by the Council's first two reasons for refusal in respect of traffic generated by the appeal proposals. Those issues do not include road safety, although the officers' summary of their advice to the planning subcommittee did make reference to safety and this is an issue upon which many objectors have raised concerns. I do not accept that this development will give rise to road safety problems in the area for the reasons set out in Section 7 of my evidence.

## **9.0 CONCLUSIONS**

9.1 The appeal site is rail connected which enables all aggregates required for the concrete production to be delivered by rail (and within a short time all cement will also be delivered by rail). The appeal proposals are therefore positively supported by both national and local transport policies which encourage the use of rail for the movement of bulk materials such as aggregates, and also seek to minimise unnecessary road journeys.

- 9.2 A large part of the site is allocated in the Council's Revised Deposit Consultation Draft UDP for general industrial or warehouse use, which could give rise to significant HGV traffic movements. This HGV activity could also take place throughout the 24 hours with uses of that type. A further alternative use would be as an aggregates depot under permitted development rights by the rail freight operator, and that would also generate substantial HGV activity. Accordingly, it is not appropriate to consider the appeal proposals against a nil use of this site.
- 9.3 It is agreed by the Council's officers and their consultants that the development will have no material impact on the capacity of the highway network, and it will have no impact on road safety.
- 9.4 There will be no material impact on amenity for residents in nearby roads. The impact of the additional traffic generated by the proposed development will be insignificant in the context of existing traffic flows and the HGV content of those flows, such that any changes in measures of amenity will be imperceptible.
- 9.5 The impact of the development on other users of the industrial estate must be considered in the context of its allocation in the Revised Deposit Consultation Draft UDP as a location suitable for general industrial and warehouse uses. Consideration must also be set in the context of existing and previous occupiers of other units on the estate, some of which generate levels of HGV activity greater than the appeal proposals. Surveys demonstrate that adding the anticipated HGV activity from the proposed development to flows recorded in September 2005 will not bring total HGV movements in the estate up to the levels recorded previously in March 2003. Accordingly, it is not possible to argue that the development will create a material change in the amenity of this estate, sufficient to deter existing or potential occupiers.

9.6 For the above reasons, I conclude that there is no proper basis to support the Council's first two reasons for refusal. Similarly, I also conclude that local objectors' concerns regarding the effects of the development on road safety are not well founded.