



1. Introduction and Context

- 1.1 This report has been prepared by DTA on behalf of KTVB, to review the highway and transportation issues relating the proposed waste-to-energy facility at Harewood. The developers are seeking a Development Consent Order (DCO) for the scheme and at present they are at Stage 2 of the pre-application consultation process and have issued their Preliminary Environmental Impact Report (PEIR) for review.
- 1.2 The facility is expected to process up to 500,000 tonnes of waste material per year and the applicants state they forecast 208 vehicles (including cars and lorries) to access the site every day when operational. At the height of construction, the current working assumption on HGVs accessing the site is 60 per day (120 movements). A peak of 1,000 staff movements are proposed during that phase.

2 Process and Methodology

- 2.1 The PEIR contains a chapter (6) specifically relating to highway and transport impacts. Chapter 6 sets out the key transport policy objectives / tests including reference to the NPPF and Policy 12 of the Minerals and Waste Plan (2013). The report is selective in its review of the NPPF and focuses on the “severe” impact test at Para 108/109.
- 2.2 At present no full Transport Assessment (TA) has been published and that is required for the application. The methodology for that TA is set out in the NPPG and the National Policy Statement. That latter document is referred to in Section 6.5 and quotes the requirements for the TA thus:
- “if a project is likely to have significant transport implications, the applicant’s ES should include a transport assessment, using the NATA/WebTAG methodology stipulated in Department for Transport Guidance”.
- 2.3 Table 6-2 refers to the fact that the TA is being prepared following “agreement of the TA scope and method”. Para 6.19 refers to a Scoping Report (June 2019) being prepared. A copy of that report has not been published and should be provided. It is not clear who that agreement is with (presumably HE and HCC) but there are clearly a significant number of other stakeholders who have previously input in to the scope of the report as highlighted by Table 6-1.



- 2.4 The NPPS requirement for the TA is wider than the issues set out by the various stakeholders however. It should cover all potential traffic and transport impacts arising from the scheme and these may well be different from an environmental impact.
- 2.5 The lack of a Transport Assessment (even in draft) at this stage makes it very difficult to properly consider the proposals. It is clear that discussions are ongoing regarding scope with which a number of stakeholders including KVTB are likely to have material and relevant input to. This is clear simply from the fact that the full impact of likely HGV and Car routing has not yet been assessed.
- 2.6 A WebTAG (as required by the NPS) also requires a detailed consideration of alternatives in transport terms and that should consider therefore whether the location of the site is the most appropriate given any wider or local highway issues and costs. That assessment has not been undertaken to date.
- 2.7 Para 6.10 sets out the basic assumptions being adopted for the TA and in the main these are considered reasonable. However the fixing of a peak hour assessment (at 0800-0900 and 1700-1800) now pre-supposes that all worse case impacts occur at peaks of highest overall traffic flows. Whilst that may be true for operational (capacity) assessment it is inevitably not true for other environmental impacts where the proportional impact of development traffic against what might be a lower base flow could be higher.
- 2.8 This error appears to be carried forward to Para 6.12 / 13 where it is suggested that the 24 hour and 18 hours will only be used to assess Air Quality and Noise impacts.
- 2.9 Furthermore, Figure 6-5 (extract below) appears to limit the geographic scope of the assessment to the immediate junctions. Whilst this may be acceptable for an operational capacity assessment it clearly does not full assess the likely wider environmental impacts and there is no assessment provided as to how or why those wider impacts have been properly scoped out of the assessment.
- 2.10 There are particularly likely to be impacts to the north of the site, east on the A303 at the A34 interchange and to the south of the A303. None of these have been considered to date.



2.11 Para 6.27 states that:

The Planning Inspectorate in the 'Scoping Opinion: Wheelabrator Harewood Waste to Energy Facility' (Ref. 6-2) agreed that the effects of 'Pedestrian delay'; 'Pedestrian amenity', and 'Fear and intimidation' could be scoped out of the appraisal subject to no changes in baseline conditions. It was also agreed that 'Community severance' could be excluded based on the location of the Site and routing of traffic.

2.12 Notwithstanding this the following paragraph suggests that these issues have in any event being included in the assessment.

2.13 At Table 6-4 the classification of sensitivity of receptors is confused. It seems to imply that an area of high population and high traffic is a more sensitive receptor than an area of low existing base line flows. A city centre with high traffic flows would clearly be less sensitive to change than a quiet rural village. This approach should be revisited.



2.14 Table 6-5 then refers to a matrix of magnitude of impact and the following sections considers thresholds for magnitude of that impact. The guidance on assessing such matters requires a degree of judgement and subjectivity.

3 Access Arrangements.

3.1 Chapter 4 (4.68) confirms all access will be from The Street and that HGV routing will be agreed with TVBC and agreed through a formal routing agreement. There is no mention of control of staff movements.

3.2 The assessments discussed below make no reference to how that control might take place and take, as in input, the assumption that all vehicles will route south direct to the A303.

3.3 The PEIR confirms that a risk assessment to GG104 is to be prepared in respect of the suitability of the junction / slip road arrangements with the A303. Highways England have also updated their highway design guidance and therefore assessment of the access should be undertaken in the context of CD122 and 123.

3.4 Review of CD122 confirms the junction arrangement to be a departure from Standard for a road with over 30,000 vehicles AADT (as in this case). Furthermore the slip roads themselves will require upgrades. The standards require auxiliary lanes on the diverge taper (Para 5.18.1 of CD123) with a length of 130m. For the merge tapers the minimum length required by the standard (Table 5.26) is 130m and they should also have a 40m nose (Para 5.26.1).

3.5 Both diverge tapers will therefore need upgrading. The eastbound diverge is currently only 100m long so represents a departure from standard that will need to be addressed before any consent can be granted. There is also a likely departure in terms of separation between the westbound merge taper and the Esso Garage access.

3.6 Until these fundamental issues are resolved the scheme cannot meet the tests of the NPPF.



4 Assessment of Impacts

- 4.1 Levels of workers on site during the construction phase will be significant (said to be typically 800 and up to 1,000 at peak times).
- 4.2 The spread and number of HGV movements is not evidenced and it is considered that the rate of 5 HGVs per hour spread over the day is unrealistic, particularly for example at times of a concrete pour on site.
- 4.3 The assessment assumes that all traffic will route south from the site via the A303. There is no evidence or justification to support this assumption.
- 4.4 The level of car movements in particular will be significant at peak shift change times. For staff origins in Newbury and other areas to the north, the most direct and indeed quickest route will not be the A303.
- 4.5 Given the nature of the roads to the north, a small proportion of that traffic seeking to route north would have a potentially significant impact on those villages. As set out below, Table 6-29 confirms nearly 10% of staff traffic will want to use the B4038. In contrast to the operational traffic assessment that has not been considered at all for construction impacts. The assessment is thus flawed.
- 4.6 At the very least therefore, there should be sensitivity testing of the impacts of vehicles (HGVs and cars) not complying with the assumption that all will route direct to the A303.
- 4.7 In terms of operational impacts, Table 6-26 forecasts around 320 HGV movements (160 in and 160 out) per day. The assumptions behind this appear reasonable but are subject to significant changes. The numbers conflict (slightly) with those quoted elsewhere (i.e Chapter 3 – 338 HGVS and the NTS - 208 including cars). Clearly this needs to be clarified and corrected throughout.
- 4.8 The direct delivery of material is via refuse collection vehicle (RCV) which has a payload of only 8 tonnes – compared with bulk deliveries of 20 tonnes. The majority of material is assumed to be bulk delivery but clearly if the proportion changes in favour in RCV then the overall movements would be significantly higher.



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- 4.9 In terms of employee trip distribution Table 6-29 confirms 9% of traffic will route to the north on the B3048. It is assumed all will turn onto the A303 W for one junction. This does not accurately reflect likely routeing and this should be reconsidered and the impacts of routes to the north assessed in detail for all the appropriate EIA impacts.
- 4.10 The gravity model approach for HGV distribution is reasonable in principle. The assumptions however do appear to conflict with assumptions elsewhere that the catchment could be as much as a 2 hour drive time (which would take in much of West London for example).
- 4.11 There is no assessment of the catchment / distribution of RCV vehicles. Given these will be mainly local there is an increased risk that they might use the B3048 to the north to serve the site. This is not assessed at all.



5 Summary / Conclusions

- 5.1 The ES takes, as an input, the assumption that no traffic (HGV or Cars) will route north of the access. There is no assessment to support that assumption and the assessment should be revisited to review that in detail. There is the potential, particularly for employee construction access and RCVs, for that impact to be significant.
- 5.2 The PEIR at present dismisses the request from a number of local stakeholders for a wider assessment on basis that the scope has been agreed with HCC and HE. The “agreed” geographical scope of the assessment is clearly too tightly defined, particularly with reference to route to the north.
- 5.3 The PIER and ES need fundamentally amending to correct this error.
- 5.4 A number of key assessments / reviews are not yet available these include:
- Operational and Safety assessments of access and A303 junctions.
 - A Webtag compliant Transport Assessment.

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