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F.A.O. Nicholas Smith – Case Officer
Cheshire West & Chester Planning Department
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11 December 2019

Dear Mr Smith

Application: 18/04949/S73

Variation of Condition 4 (HCV movements) of Planning Permission 17/01820/S73 to remove requirement to reduce movements over time

Site: Encirc Glass Ltd, Ash Road, Elton, Chester CH2 4LF

I am writing on behalf of Elton Parish Council in relation to the above Planning Application. Following a meeting with residents on Monday 9 December 2019 it was agreed that the Parish Council would write to make representations on behalf of residents.

Members of the public raised their concerns as follows:-

The revised application includes a decrease in the requested number of HCV vehicles by 8% from their original planning application and also the proposal to withdraw the application for a 3m acoustic noise barrier. The latter being in response to residents' comments. They have also committed to a legal agreement to upgrading and maintaining the surface of Ash road including the initial resurfacing using specialised noise reducing pavements to achieve a reduction in noise levels and manhole cover packing.

This commitment involves an annual visual survey of the road and then subsequent repair of any defects following this annual inspection in a timely manner to ensure the condition of the road is maintained and noise from the additional HCV movements is mitigated.

The Parish Council on behalf of residents object to their revised proposals on the grounds of Ash Road already being unsuitable as a commercial access road and the increased noise, increased wear, tear and damage to the road surface and increase risk to residents safety and health from their proposal to increase the number of HCV's. Specific reasons are listed as follows;

- **Noise**

Ash Road is clearly not suitable for the current 2728 HCV movements a week and so is most certainly not suitable for the proposed 4948 HCV movements a week. Encirc

continue to refer to residents 'perceived' noise issues. The existing noise from the movements is a clear nuisance and is distressing to residents as demonstrated by over 90 objections to their original planning variation 18/04948/S73 to increase vehicle numbers. The current movements can already be heard day and particularly at night and in the summer when windows are open.

Encirc's own revised noise assessment concludes that increasing HCV movements to 912 a day "will have an adverse impact on surrounding residential receptors in terms of noise" (i.e.; there will be an increase in noise along Ash Road). It also concludes that it is not possible to model and so conclude definitively that any increase in noise levels due to increased HCV flows would be completely cancelled out by the proposed resurfacing measures.

- **Damage to Ash Road**

The current 468 HCV movements a day have damaged the road with large tarmac indenting/ruts in places, drains falling in and damaged covers due to the heavy weight of the HCV's. Not only does this make the road dangerous for residents' vehicles and cycles it also causes damage to our vehicles. The damaged drains only add to the noise levels particularly at night when you can clearly hear HCVs passing over the drains/grids/potholes. This will most certainly increase noise nuisance to residents. Encirc are proposing to inspect and repair the road once a year. At this time the Parish Council do not have the details of the frequency Highways are having to make repairs to Ash Road with current HCV numbers but it is most certainly more than once a year! In fact, it is probably more like once a month. Whilst their proposal to upgrade the road will no doubt reduce the frequency of damage the Parish Council think it is incredibly optimistic of them to expect it to last a year! What will happen in-between his time? Who will be responsible for the repairs and making sure they are completed in a timely manner?

- **Safety**

Traffic management by Encirc is inadequate. The road is 30mph however HCVs and employee cars regularly speed down Ash road. It is also not unusual to find HCVs parked on Ash road, which makes it difficult and dangerous to pass. In addition, trying to pull out onto Ash Road from the Holme Drive estate is at times very dangerous with the speed at which vehicles including HCV's travel down Ash Road and the current number of vehicles using Ash road. This will only worsen with an increase in the number of HCV's. The impact of the current level of HCVs can also be felt throughout the village with HCVs regularly missing the turning to Encirc and continuing through the village. The waiting time is increasing to get out of the Holme Drive Estate at the junction with Ash Road and at busy times cars trying to get out of the estate are queuing up along Redwood Drive and Holm Drive. This can only worsen with an increase in traffic. The continued poor condition of Ash Road is dangerous for users of the road as vehicles often swerve to avoid potholes/parked HCVs. When drivers of the HCVs are parked up on the pavement residents have to go into the road to get around the HCV. When asked the HCV drivers refuse to move their vehicles. Even Encirc's own security have been unable to get the drivers to move when they have asked.

Children attending Helsby High School wait for the school bus on Ash Road in the morning and are dropped off there late afternoon. It is already very dangerous for them whilst waiting for the school bus on the pavement with the existing number of HCV's passing along the road. An increase in the number will inevitably put the children at a greater risk.

- **Health**

- The increase from 2728 HCV movements to 4948 will clearly have a negative impact on air quality in Elton. Pollution/Diesel Emissions/Impact on Health/Traffic – The UK Central Government acknowledges the harmful effects of diesel emissions and has a policy in place to reduce these by 2040. How does Encirc's proposals of increasing the HGV movements by the proposed amount in its Planning Application 18/04948/S73 fit in with Government Policies to reduce harmful diesel emissions? Central Government is also advocating a multimodal transport policy moving freight away from the roadways and onto alternative modes of transport so how does Encirc's Planning Application 18/04948/S73 fit into this policy? Residents feel that if the increase in HCV movements is granted then any incentive Encirc has to explore other options such as lobbying MPs for an additional Junction off the M53 direct into Encirc or working towards another solution will be removed. Residents feel that the growth of Encirc should not be at the detriment of residents' health and safety.

Anti-Social Behaviour

Residents raised concerns regarding the anti-social behaviour of some HCV drivers which as well as illegal parking and taking illegal left hand turns out of the bottom of Orchard Park Lane onto Ash Road (there is no left turn and the junction is set up to prevent left turns but HCV drivers have been seen attempting this manoeuvre which blocks both Orchard Park Lane and Ash Road for 10-15 minutes whilst the driver inches forwards and backwards, mounting the kerb to make the illegal turn.

The entrance onto the Encirc site off Ash Road is via a bottleneck under a railway bridge and is operated on a contraflow. At busy times there is a queue of HCVs waiting to enter onto the site. It only needs 3 HCVs waiting to enter the site before the junction of Orchard Park Lane/Ash Road is blocked by the HCVs. If this is happening at the current HCV movements then doubling it will create greater traffic flow issues.

To summarise Ash road is not suitable for the current 2728 HCV movements a week and so is most certainly not suitable for 4948 HCV movements a week. The admitted negative impact by Encirc's own experts on noise, the increased damage to the road surface and drains and the increased safety and health risk to local residents who can only use Ash Road to access and egress the estate will undoubtedly have a strong negative impact on the local community in terms of health, safety and quality of our living environment. Over 90 residents objected to the original application a record number for the village of Elton.

Residents feel that Encirc have done very little so far to remedy ongoing issues and have very little faith in Encirc's promises.

For the reasons detailed above Elton Parish Council wish to formally object to this Planning Application.

Yours sincerely

Tracey Bellis
Elton Parish Clerk