

Dear Ms Stevenson,

I am writing with regards to the additional information submitted by the applicant, in relation to the application for *'the temporary (5 years) change of use from SUI Generis formed of an electricity undertaker's depot to a dual use of Class B8 (to provide a scaffolding equipment storage/distribution yard) and SUI Generis retaining the existing electricity undertaker's depot. Retrospective.* Objections to Masons Scaffolding Highways and Transportation advice in regard to LEB Site at Churchfields Road

Masons Scaffolding state that further to a review of the application it is understood that LBB Highways do not have any objections to the proposals from a transportation perspective. Does this mean that LBB are completely satisfied that the access to the site and the suitability from the access road to Churchfields Road is completely fine in their eyes with no risk to the local environment, the local residents and most importantly the school students and parents?

I note that the Applicant Transport Response letter suggests that *'London Borough of Bromley (LBB) Highways do not have any objections to the proposals from a transportation perspective'*. Does this mean that LBB are completely satisfied that the access to the site and the suitability from the access road to Churchfields Road is completely fine in their eyes with no risk to the local environment, the local residents and most importantly the school students and parents? I find this deeply concerning and would like to understand if a Highways officer has visited or intends on visiting the site to undertake a thorough assessment of not only the access road but also the point between Churchfields road and the access road itself for the suitability of the site access for both 10m rigid and 16.5m articulated trucks, and consequent road safety implications, and to insist on an independent Road Safety Audit being carried out with the input of Churchfields school taken into the utmost consideration. I note that Bromley Local Plan Policy 32 Road Safety states that *'the Council will consider the potential impact of any development on road safety and will ensure that it is not significantly adversely affected'*. From the evidence you have received alone with regards to Masons Scaffolding lorries seen regularly driving the wrong side of the access road, endangering the public safety, the workers of the recycling centre and anybody else in the vicinity should alone be damning enough.

The times stated by SLR on behalf of Masons Scaffolding in the proposed trip generation sector they state that journeys will be made from 7am-8am and 4pm-5pm. In their whole assessment it states only about the access road shared with the recycling centre, it does not once take into regard the school, this is of deep concern given that Churchfields School runs numerous Breakfast clubs and Afterschool clubs. It does not include the fact they run numerous school trips and does not include the main risk being that to enter the access road they have to go across a path which school children, parents and local resident must cross regularly. When consideration is also given to the fact that a huge increase to HGV traffic will cause a huge amount of distress to young children, elderly, residents and most importantly the SEN students who attend Churchfields school and are noise sensitive. It is worth noting that Churchfields school are a specialist school for SEN students and having a scaffolding yard which in nature is sporadically loud will likely cause a lot of distress to noise sensitive students attending the school.

The times stated are also not taken into consideration by SLR/Masons scaffolding that they are exiting/entering at the same times as Veolia HGVs, the impact this will have to the residents for noise and safety is huge and completely ignored by all the provided assessments and should be brought to the attention of Traffic commissioner and/or LBB Highways and an independent assessment should be required to provide a fair and unbiased view to this, notably this assessment should be for the site, the access road and the entrance leading to the access road and any local impact assessments.

Masons Scaffolding HGVs have been regularly observed (with images to hand available of should you require) not being able to access or exit the site in 1 movement and having to reverse to adjust position whilst obstructing the flow of traffic in both directions on more than one occasion, this alone is an accident waiting to happen and I have witnessed many parked vehicles opposite the entrance being extremely close to contact with Masons scaffolding lorries.

SLR states there will be 15 two way movements at both the stated entry/exit times mentioned, they also state the noise caused from only 1 HGV is around 66dB, why is the noise of a minimum of 8 HGVs simultaneously not being given as a realistic figure, at 7am (Start time) all if not half the vehicles on site will have to do their 15 minute vehicle check with the engines on that they are legally obliged to do for their Operators license. What noise will this create?

In no part of SLR' assessment do they consider any factors other than the access road. Given that this site has so many noise sensitive factors surrounding it, its entry and exit point and neighbouring residents it shows nothing but a clear bias and possibly raises questions to the professionalism of the company in their ability to undertake this assessment in a fair manor to all affected parties.

SLR states its highly unlikely that traffic queues would form along the access road, if this is true why is traffic regularly seen queuing down Churchfields road, with local transport (buses) regularly seen having to manoeuvre around these queues? If the assessment works on presumptions which it clearly does, at points then the scenario of how masons scaffolding will be enter/exit the site raises some serious concerns. HGVs will not be able to exit or enter if there are traffic queues and will obstruct the access for the recycling centre, therefore causing not only a high risk but also obstructing any traffic from exiting or entering the site given that the access road to Churchfields road already cannot be manoeuvred in one turn already due to the radii of the entrance between the access road and Churchfields road being unsuitable by all the vehicles being used by masons scaffolding when completely clear, again this is something that needs to be taken into consideration by LBB Highways.

SLR proposes that a booking system at the recycling centre could resolve the queuing traffic but have previously stated and shown in all their examples that queueing traffic is not there in the first place so which is it? Even if a booking system was put in place there is no evidence to suggest this would alleviate the ques between the time slots and is simply a matter of opinion, which so far has been proven to be limited.

SLR have provided supporting evidence from crashmap.co.uk which shows that there have been no accidents in or around the access road, I would suggest however that this does not show anything which decreases the risk given that the main argument is about the safety of children and the fact that nothing has occurred already is a statistic that I feel we should all be striving to keep and not using as a positive reason to increase the flow of HGV' and therefore increasing the risk of life being endangered (mainly children) and this should be something that not only LBB should be striving to protect but all parties involved regardless of their needs.

SLR states that drivers of scaffold vehicles would be obligated by the highway code (in this instance with regards to the access road) and that all their drivers are trained to the highest of standards and should queue alongside all those wishing to access the recycling centre until they pass the entrance and proceed safely into the site. This seems to be contrary what has been visually observed with the scaffold lorries passing on the opposite side of the already narrow access road.

SLR states that there is a greater chance of interaction in the evenings on the access road in once again completely ignore the major risks of entering the access road from Churchfields road and the surrounding park or school.

SLR states that they conclude that the proposals will not cause demonstratable harm on the local highway network, this is an assessment only for the access road and not for any other factor of the access to the site which is not only immorally wrong but also a huge risk for every single surrounding resident or user of the road, pavements, school and public park.

SLR state their noise assessments show that noise levels would be at 38dB, from all information provided this is only for one vehicle even though they are operating numerous vehicles with shared loading times and shared entry/exit times.

SLR states that Masons scaffolding was undertaking enabling works but not operating in general. This is a complete and utter lie and there are numerous pieces of supporting evidence available that shows Masons scaffolding vehicle leaving the site daily, personally today I witnessed and have photos of 5 HGV's leaving the site today and can also be supported in the fact that at least 1 HGV truck from their fleet is left parked on site overnight every single day.

Background noise between 6am to 8am is calculated to be at around 40dB, an idling truck is at 85dB for ONE vehicle at 50feet in distance, what would the noise be for the proposed amount of vehicles on site? Even if it was for 4 vehicles at one time given the entry/exit rates, notably this does not include the loading and unloading of the vehicles.

Loading and unloading of vehicles – a palletised system has been mentioned, further information needs to be provided with evidence of exactly how scaffold poles can be loaded/unloaded using a Forklift truck and at supporting evidence of this will decrease the noise as a comparison to loading/unloading by hand. What is assurances are they providing to suggest that this is the only method of loading to be used? What noise will be generated by said FLT operating? I also have concerns that SLR stating that their client uses a palletised method is completely untrue, I can again support this by providing evidence of Masons scaffolding unloading lorries by hand and poles thrown to the floor creating additional noise issues, most notably for this the supporting evidence is from Masons scaffolding unloading 3 HGV's at 7:30pm last night and staff working through till 9:30pm last night.

They need to provide supporting evidence of a recognised and compliant system for the above.

If 10+ vehicles need to be loaded daily what will the generated noise be? What supporting evidence has been provided to demonstrate reasons sound levels are adhered to?

I would also like to draw to light the inaccuracy of the assessment of the Recycling Centre being deemed as industrial, this is not correct. The recycling centre is a Civic Amenity site and not an Industrial recycling centre so for SLR to be basing their application around this is factually incorrect and the equivalent of comparing chalk and cheese.