

Public Inquiry – hearing session 1 Roads and Traffic

Baselines

1. Dart's Environmental Statement (DE 19) states at paragraph 12.14 "*The baseline use of core paths is not known*".
2. Baseline studies of roads appears to have been desk-based. (Environmental Statement 12.16)
3. The list of core paths in the Environmental Statement (DE 19) 4.92 does not include the section of National Cycle Route 76 where it shares Moss Rd between Drum of Kinnaird and the A88 (for about 500m where it crosses the motorway – see CCoF 240). This section of cycle route is not included in Environmental Statement Figure 12.2 (Core Path map), nor is it mentioned in Chapter 12 of the Environmental Statement (see 12.39). Cycle route 76 does not appear to be mentioned at all in Chapter 12 of the Environmental Statement.
4. No attempt appears to have been made to identify groups which might be adversely affected such as walkers, cyclists, horse-riders. This is contrary to the advice in the IEA "Guidelines for the Environmental Assessment of Road Traffic" – lodged as DE(R)10 which states at paragraph 2.5 "*At an early stage, it is useful to identify particular groups or locations which may be sensitive to changes in traffic conditions*". The guidelines go on to list special interests such as cycling and walking, along with other sensitive groups. Paragraph 2.6 of the guidelines states that "*the assessor should consult widely with the Local Planning and Highway/Road Authorities, representative bodies and affected groups.*". No consultations have been held with Falkirk Bicycle Club or SUSTRANS (as far as we are aware).
5. Falkirk Bicycle Club use Moss Road and others in the proposed development area (PDA) for training runs and time trials (see CCoF 309). Outwith club training sessions, the roads in the PDA are well-used by cyclists for practice.
6. Core path 011/213 (Bogend Rd), in the vicinity of site L, is well-used by runners, walkers, families, cyclists, horse-riders. There are stables in the area. Families often pick brambles by the roadside. This route is one of the main access routes to the countryside for residents of Kinnaird Village and The Inches estate. Objections over the use of Hamilton Rd/Bogend Rd have been recorded in Table 3.1 of Dart's Hearing statement. These objections have been dismissed in paragraph 3.179 of Dart's hearing statement since Hamilton Rd (to the south) is no longer being used. However Hamilton Rd/Bogend Rd run into each other and recreational use extends beyond Hamilton Rd, north along Bogend Rd past site L. Much of this recreational use is during the day (lunchtimes, after school, school holidays etc.) when traffic would be accessing site L.
7. Explain the existing difficulties on single-track road (Bogend Rd) with cycles encountering cars (cyclists have to stop).

Traffic impacts

8. The Environmental Statement does not appear to have estimated traffic relating to the construction of the pipeline corridor and associated infrastructure. The discussion of traffic impacts in the Environmental Statement is confined to the drilling sites and the GDWTF

(summarised in 2.10 of Dart's hearing statement). For the drilling sites this is broken down into preparation, drilling and production. It is not clear if the preparation phase also includes the construction of the well pad itself (which will require significant amounts of base material to be brought on site).

9. The Environmental Statement gives an estimate of 158 vehicles at the maximum progression of development. There is no indication in the Environmental Statement of a more typical situation. How many well sites can we typically expect to be drilled/prepared simultaneously? What would be the expected impact over the 2-5 years estimated to drill all the wells (as stated by Mr Bain in his evidence)? The IEA guidelines (DE(R)10) state in paragraph 2.8 that *"In preparing an Environmental Statement it is considered that the documentation should enable significantly affected people, parties or interests to be able to identify the "worst" environmental impact that might reasonably be expected, in addition to how they would be affected by the average or typical condition"*.
10. Section 4.201 of Dart's hearing statement states that the 158 movements would be spread across the access routes – however most sites share Moss Rd as the common access point from the A88. 158 HGVs per day averages as 19 per hour over 8 hour period – approximately one every 3 minutes. (Or one every 4 mins if averaged over 11 hour day).
11. Mr Bain's precognition paragraph 3.6.1.7 (c) states that under a success case there may be an *"annual application for each of the next five years"*. Clearly there will be a cumulative impact on traffic if it takes an estimated 2-5 years to drill the wells in the current application.
12. There may be additional traffic impacts as a result of planning conditions – e.g. boundary treatments (conditions 5, 6, 7), installation of monitoring wells (condition 12) etc.
13. Paragraph 2.134 in Dart's hearing statement states that there are no sensitive receptors along Moss Rd other than non-motorised users. What about impact on wildlife (otters?) especially in Pow Burn?

Assessment of HGVs

14. The increase in HGV movements was not assessed within the Environmental Statement despite the fact that the increase in number of HGVs is vital in assessing whether Rule 1 or Rule 2 apply (see Environmental Statement 12.13 and IEA guidelines DE(R)10 3.15).
 - Rule 1: Include highway links where traffic flows will increase by more than 30 % (or the number of heavy goods vehicles will increase by more than 30 %); and
 - Rule 2: Include any other specifically sensitive areas where total traffic flows have increased by 10% or more.

This was acknowledged in Dart's hearing statement at paragraph 2.124.

15. The IEA guidelines (DE(R) 10) make several references to the fact that HGVs should be separately assessed:
 - Paragraph 3.4 *"The assessment of the environmental impacts of traffic requires a number of stages, namely: determination of existing and forecast traffic levels and characteristics..."*

- Paragraph 3.6: "*Estimates of heavy goods vehicles movements should be provided separately.*"
- Paragraph 3.19: "*Where there are major changes in the composition of traffic flow, say a much greater flow of HGVs, a lower threshold may be appropriate.*"
- Paragraph 4.42: "*Where a development is expected to produce a change in the character of the traffic (e.g. HGV movements on rural roads), then data on existing accident levels may not be sufficient.*"

16. Section 12.42 of the Environmental Statement gives 20% increase for Bogend Rd and 9.6% increase for Moss Rd as worse case. This is based on *total* number of vehicles. The percentage increase in the number of HGVs is not calculated.
17. Section 12.36 of the Environmental Statement states "*The predicted levels of traffic for the other roads in the table above are each below the threshold to warrant further assessment under either of the IEA document's rules.*" This is incorrect - the rules have not been applied properly as HGVs were not assessed.
18. Dart's hearing statement (paragraph 2.124) acknowledges that HGVs were not assessed in the Environmental Statement. Some calculations are then done for A88 (paragraph 2.125) to conclude that HGVs will increase by 44%. It is not clear why these calculations were not done for the other roads in the PDA – especially Moss Rd as this is the common access route.
19. The baseline of 358 HGVs on A88 is presumably taken from traffic surveys (see Dart's hearing statement 2.125). This is $(358/9600) = 3.7\%$ of total traffic.
20. It is unclear if baseline numbers of HGVs exists for Moss Rd. Taking the total number of vehicles on the Moss Rd from the Environmental Statement (Table 12.1) gives 1652 vehicles. As an estimate, assuming 3.7% are HGVs this gives 61 HGVs as a baseline on the Moss Rd. An increase of 158 HGVs is therefore an increase of **260%** on Moss Road. Therefore Rule 1 of the IEA guidelines should apply. Note that Moss Rd includes a section of National Cycle Route 76 and is well-used by cyclists.
21. Note that the calculation above is an estimate – clearly the characteristics of the traffic on the Moss Rd may differ from that of the A88. Hence the need for baseline data on numbers of HGVs.
22. Similar calculations should be done for the other roads in the PDA – including Bogend Rd (access to site L), the B9124 (sites A,B,C,D,E), Linkfield Farm Rd (sites F, H, J, K) and Torwood garden centre access Rd (sites M,N).
23. Dart's hearing statement (paragraph 2.129 and Table 2.1) use an example of fear and intimidation from the IEA guidelines (DE(R)10 paragraph 4.41) to conclude that there will be no significant impacts from HGVs since the total number of vehicles is less than the lowest threshold for a moderate effect. However, the IEA guidelines also state "*thresholds, set out below, could be used as a first approximation of the likelihood of pedestrian fear and intimidation, although other factors need to be included, e.g. proximity to traffic, pavement widths*" and that "*other vulnerable groups should be separately identified*". (DE(R) 10 paragraph 4.41).

24. Paragraph 3.17 of the IEA guidelines gives additional information "*Severance and intimidation are, however, much more sensitive to traffic flow and the Department of Transport, in its MEA, has assumed that 30%, 60% and 90% changes in traffic levels should be considered as "slight", "moderate" and "substantial" impacts respectively.*"
25. In Dart's hearing statement they make repeated reference to the fact that neither Falkirk or Stirling council have objected to the proposals as far as roads/traffic are concerned – however the councils' conclusions were presumably based on the the conclusions in the Environmental Statement which did not take into account increase in HGVs.

Traffic management plan

26. Residents have requested Dart's traffic management plan but have not yet been provided with a copy.
27. Experience with recent drilling on Moss Rd (Airth 13+14).
28. Dart report no problems in the pilot phase of the development. How can Dart be sure that the traffic management plan is sufficient to cope with the increased flow of traffic associated with the current plans?
29. What type of incident do Dart envisage giving rise to a yellow card? How would an incident be reported to Dart? Would members of the public contact Dart with a complaint, or the council? Is a contact phone number visible on Dart's vehicles so that people know who to contact?
30. Have any yellow or red cards been issued in pilot phase? If so, what for?
31. It would only take a single incident to have potentially very serious consequences.
32. Many of the contractors might not be local and won't be familiar with the roads, local cycle routes, areas used by residents for recreation etc. What steps will Dart take to make sure drivers who are new to the area are warned in advance about the potential for encountering non-motorised road users?