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APPENDIX ES19.1
TRANSPORT ASSESSMENT



transport assessment

ENRMF Western Extension
Northamptonshire

Transport Assessment

CCE/ZB791/TA04

July 2021

For Augean South Ltd

PINS reference WS010005

Document Review Sheet

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Glossary

CIHT	Chartered Institute of Highways and Transportation
CLG	Communities and Local Government
DCO	Development Consent Order process for obtaining permission for developments categorised as Nationally Significant Infrastructure Projects.
DEFRA	Department for Environment Food & Rural Affairs
HGV	Heavy Good Vehicle
Highway	road forming part of the publicly maintained network
HA	Highways England (formally Highways Agency)
HE	Highways England. The government company in charge of the strategic road network (SRN)
LRN	Local Road Network
Peak Hour	The time period or part of the day, where traffic volumes and or congestion is at its highest.
PIA	Personal Injury Accident Data – records of accidents involving a casualty
SRN	Strategic Road Network – Parts of the highway network managed by Highway England
Trips	These are new trips on the road network where 1 trip is equal to 1 vehicle movement either to or from the site.

Bibliography

- DEFRA (June 2013) National Policy Statement for Hazardous Waste
- CLG (July 2021) National Planning Policy Framework
- CLG (March 2019) Planning Practice Guidance
- CLG (March 2007) Guidance on Transport Assessments
- HA –(November 2012) Protocol for Planning Development
- NCC (July 2017) Minerals and Waste Local Plan

EXECUTIVE SUMMARY

Cannon Consulting Engineers (CCE) are appointed by Augean South Ltd to provide highways and transportation advice in respect to the proposed western extension to the existing East Northants Resource Management Facility (ENRMF) site.

The proposed development comprises a western extension to the site, which will continue the operations at the site for a further 20 years up to 2046. In addition it is proposed to change the total import of materials associated with the waste treatment and recovery facility to increase the throughput from 200,000 and 250,000 tpa. The overall waste input rate to the site will increase from 250,000 tpa to 300,000 tpa.

Following the Scoping Opinion provided by PINS a formal pre-application request was made to Northamptonshire Highways (NH) and Highways England (HE). A scoping note was submitted as part of the discussions which provided details of the HGV trips during the AM and PM peak periods. The scoping note also provided an assessment of the existing sustainable connectivity of the site.

NH provided formal comments in relation to the assessment of the local road network (LRN) dated 30th March 2021, where they agreed that:

- *“Given the anticipated minimal increased number of peak hour trips the LHA would confirm that further junction capacity assessment will not be required;*
- *The proposals rely on the site access improvements in accordance with drawing 1961/1/097 and these elements should be suitably secured through the DCO process; and*
- *Due to the permanent on site staff numbers remaining the same we could not sustain an objection based on a lack of sustainable connectivity, but acknowledging the site is poorly connected for non-motorised vehicles.”*

HE provided formal comments in relation to the strategic road network (SRN), dated 30th March 2021 where they state that:

“we note that you anticipate the proposed extension to result in an additional movement of 36 two-way HGV trips per day and consider this to be acceptable. Considering the operational hours of the proposed development (07:00 to 17:30 hours), this would equate to circa 4 HGV movements per hour. As the likely traffic impact from the proposed development on the SRN in the area is minimal, we do not require you to undertake further traffic assessments.

The existing conditions have been reviewed where it is noted that the sustainable connectivity for employees (by walking, cycling and public transport) to the site is poor. However this reflects the development type and national catchment area as set out in

Northamptonshire's Minerals and Waste Local Plan. As noted above Northamptonshire Highways confirmed through scoping that they are satisfied that it is acceptable.

The Personal Injury Accident data for the most recent 5 year period has been obtained. The data shows there have been no recorded injury accidents on Stamford Road or associated with the development access. A wider review of the A47 corridor does not indicate any safety problems. The trips associated with the proposals are low and will not have a material impact on the existing safety of the road network within the study area.

Augean is progressing a scheme through the S.278 process to widen the site access. This is not in response to an impact / current obligation or as a result of this proposal. However NH has requested that the works are secured as part of the DCO application.

The existing accident data has been reviewed and it is not considered that there are any existing accident issues which would be exacerbated by the proposed development.

The existing complaints received from members of the public relevant to traffic and transportation have been reviewed, including the responses from Augean. The complaints included:

- The condition of the carriageway at the site access, which has subsequently been resurfaced;
- Mud on the road, which is the result of dirty water being carried onto the road as a result of the wheel washing facility and ponding in the site entrance way rather than mud/debris (the ponding will be addressed by the entrance works) and
- Road safety / signage, where Augean have offered to pay for additional signage on Stamford Road.

The proposed development will lead to an increase of 36 two way HGV trips (36 movements) per day which equates to an hourly increase of up to 4 HGV trips per hour. This increase in HGV trips has been reviewed by Northamptonshire Highways and Highways England as part of the pre-application scoping process and are satisfied that the proposals would not result in a severe impact. As a result they do not require a detailed capacity assessment of the highway network to be carried out as part of this Transport Assessment.

In a summary it is not considered that the residual impact from the development is severe as prescribed by NPPF and HE's protocol. This view is supported by the pre-application correspondence where NH and HE were satisfied that the impact of the

development was minimal and that no further assessment of the highway network was required.

This TA has been prepared in line with the agreed scoping and in accordance with current guidance.

1.0 INTRODUCTION

Background

- 1.1 Cannon Consulting Engineers (CCE) are appointed by Augean South Ltd (Augean) to provide highways and transportation advice in respect to the proposed western extension to the existing East Northants Resource Management Facility (ENRMF), located in Kings Cliffe, Northamptonshire, PE8 6XX.
- 1.2 The existing ENRMF site is located to the south of the A47 in Kings Cliffe. The site, operated by Augean, comprises an active hazardous waste and low level radioactive waste landfill site including a waste treatment and recovery facility. The approximate location of the site is shown below:

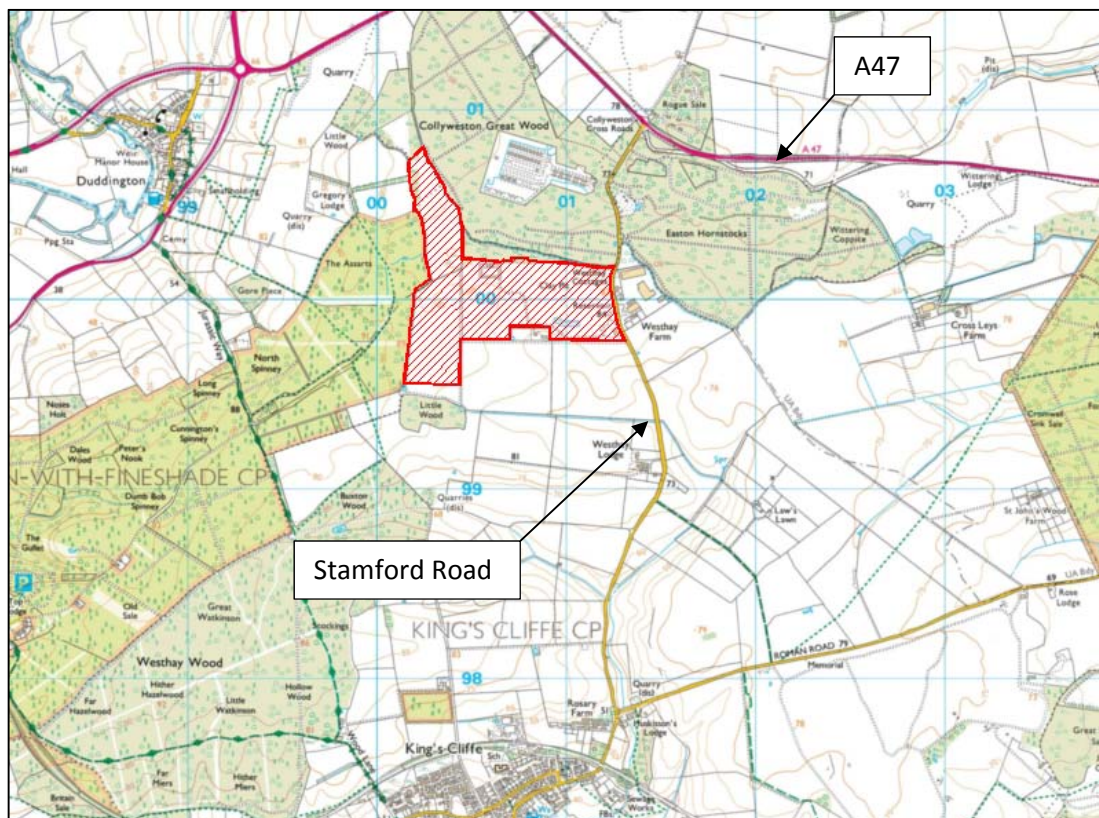


Image 1.1 – Indicative Site Location

- 1.3 The site was granted a Development Consent Order (DCO) SI 2013 No.1752 in July 2013, which covers the current operations at the site which are due to end in 2026. The 2013 DCO contains two works associated with the authorised project, which are summarised as:

- Works 1 – Hazardous waste landfill facility for the disposal at direct input rate of up to 150,000 tonnes per annum (tpa) of hazardous waste and low level radioactive waste; and
 - Works 2 – A hazardous waste facility comprising an alteration of an existing soil treatment facility with a consented capacity of 150,000 tpa of contaminated materials comprising predominantly hazardous wastes, and associated infrastructure.
 - The total waste input to the site was limited to 200,000 tpa.
- 1.4 A non-material amendment order was approved in 2018. The East Northamptonshire Resource Management Facility (Amendment) Order 2018 SI 2018 No: 742 permits the increase the consented throughput of the soil treatment facility (now known as the waste treatment facility) by 50,000 tpa to 200,000 tpa, with a total site input level of 250,000 tpa.
- 1.5 The site was visited on 11th December 2020 to observe the existing conditions, general traffic movements, and the operation of the junctions. The Stamford Road / A47 junction was observed between the hours of 0900 and 1000 as a snap shot in order to determine a broad distribution of HGV trips. Formal traffic surveys have not been carried out as the effects of the Covid-19 pandemic have affected traffic patterns and volumes. In addition NH and HE confirmed that no assessment was required following pre-application scoping and therefore new traffic surveys are not required.

Development Proposals

- 1.6 The proposed development comprises the construction of new landfill void to the west of the currently consented hazardous waste and LLW landfill area (the western extension) and the alteration of the restoration profile and the timescale for completion of the existing landfill site in order to integrate the final landscape of the existing site with the western extension. The application includes an increase in the consented throughput of waste to the waste treatment and recovery facility and an increase in the total input rate to the site. In order to construct the western extension void it will be necessary to win and work minerals including the extraction of soils, overburden and clay. The soils and some clay will be retained on site for use in site restoration and the construction of the low permeability engineered liner and capping layers. The remaining materials will be exported off site. The application includes the alteration of the operational period of the current site activities and the western extension to 2046. A summary of the proposed development is presented below:
- The construction of new landfill void for the disposal of the same range of hazardous wastes and low level radioactive waste (LLW) disposed of

at the site currently with a capacity of greater than 100,000 tonnes per annum (tpa) supported by the existing site infrastructure. The new landfill will comprise a number of phases and provide a landfill void of approximately 2.5 million cubic metres;

- The continuation of filling of the existing ENRMF landfill with hazardous waste and LLW the subject of the current DCO and the amendment of the consented restoration profile to tie the existing landfill in to the proposed extension landform. The amendment to the restoration profile will result in the creation of new void at the existing site;
- The winning and working of minerals in order to create the landfill void and provide extracted materials for use on site as well as the exportation of clay and overburden for use in engineering, restoration and general fill at other sites;
- The stockpiling of clay, overburden and soils for use in the construction of the engineered containment system at the site and restoration of the site;
- The direct input of waste into the existing and new landfill will continue at a rate of up to 150,000tpa;
- An increase to the waste throughput of the waste treatment and recovery facility to 250,000tpa which comprises an increase of 50,000tpa compared with the rate consented in the 2018 DCO amendment;
- A combined total waste importation rate limit to site including that to the waste treatment and recovery facility and to the landfill of 300,000tpa which is an increase of 50,000tpa compared with the currently consented total input rate;
- The operational hours of the site will not change from those already permitted;
- Restoration to generally domed restoration landforms in the extension area and amendment to the approved restoration profile of the existing ENRMF site to create a coherent restored landform over the whole application site;
- Restoration of the site to nature conservation interest using the soils available at the site as well as suitable imported materials; and
- Completion of the landfilling and restoration operations by December 2046.

- 1.7 The requirements for a Transport Assessment / Statement are not specifically given for this type of development within the Local Government's (CLG) Guidance on Transport Assessments, however typically this would fall within a B2 use. The National Policy Statement for Hazardous Waste (NPS) requires a Transport Assessment (TA) to be carried out where the proposals are likely to result in a significant traffic impact and that the scope of the assessment should be agreed with the relevant highway authorities. A detailed scoping note and pre-application request was made to Northamptonshire County Council and Highways England to scope the content of the TA, which is explained below.

Scoping

- 1.8 Initial contact was made with Northamptonshire County Council (NCC) by Tesh Consultants on 7th May 2020 on behalf of Augean South Ltd to discuss the scope of the assessment. Northamptonshire Highways responded on 11th May 2020 to make the following comments (**Appendix A**):
- The existing and proposed traffic routes should be identified;
 - Width of roads which could cause concern if exacerbated;
 - The form of the current access and whether mitigation is required;
 - Identify the existing staff and car trips and the need for additional parking;
 - Identify the existing and proposed HGV trips; and
 - Review of sustainable connectivity.
- 1.9 A scoping request together with a scoping report was prepared by MJCA and submitted to the Planning Inspectorate on 1 July 2020 and the Scoping Opinion was provided in August 2020. Highways England (HE) were consulted on the scoping report, providing formal comments dated 17th July 2020. In their response they noted that the proposals were likely to lead to an increase in HGV trips and that they would require the proposed increase of trips to be quantified, including the impact on the Strategic Road Network (SRN). The nearest point of impact of development traffic on the SRN is the A1 junction with the A47 and the A1 junction with the A43.
- 1.10 It is understood from the pre-application consultation undertaken in late 2020 that there are local concerns relating to the impact of HGV trips from the development on the road construction and from mud on the road.
- 1.11 Following the provision of the Scoping Opinion CCE were appointed to progress the subject of traffic and transport for DCO application and the estimated HGV trips associated with the proposals were calculated based on the development

of the design of the proposals.. Further scoping discussions based on the estimated trips have been held with Highways England and Northamptonshire County Council in 2021 which is set out below.

- 1.12 A scoping note was prepared in response to comments made by HE and NCC to PINS in response to the formal scoping request in July 2020, see **Appendix B**. The purpose of the scoping note was to agree the scope of the assessment. In particular the scoping note provided the estimated trip generation associated with the proposals. The increase in HGV trips associated with the site and impact on the highway network (Local Road Network and Strategic Road Network) was presented in order to demonstrate that it would have a low/negligible impact and therefore an assessment of the offsite highways network was not required. The scoping note was issued to Northamptonshire Highways (NH) as the local highway authority (LHA) and Highways England (HE) who are responsible for the Strategic Road Network (SRN) on 17th March 2021.
- 1.13 NH provided formal comments dated 30th March 2021, where they agreed that:
- *“Given the anticipated minimal increased number of peak hour trips the LHA would confirm that further junction capacity assessment will not be required;*
 - *The proposals rely on the site access improvements in accordance with drawing 1961/1/097 and these elements should be suitably secured through the DCO process; and*
 - *Due to the permanent on site staff numbers remaining the same we could not sustain an objection based on a lack of sustainable connectivity, but acknowledging the site is poorly connected for non-motorised vehicles.”*
- 1.14 A copy of NH’s response is contained at **Appendix C**.
- 1.15 HE provided formal comments, dated 30th March 2021 where they state that:
- “we note that you anticipate the proposed extension to result in an additional movement of 36 two-way HGV trips per day and consider this to be acceptable. Considering the operational hours of the proposed development (07:00 to 17:30 hours), this would equate to circa 4 HGV movements per hour. As the likely traffic impact from the proposed development on the SRN in the area is minimal, we do not require you to undertake further traffic assessments.*
- 1.16 A copy of HE’s response is contained at **Appendix D**.

- 1.17 In accordance with the National Policy Statement for Hazardous Waste (NPS) and the Communities and Local Government's (CLG) Guidance on Transport Assessments a Transport Assessment has been carried out using the agreed scope. As described above there is not a requirement to carry out a detailed assessment of the road network.

Report Structure

- 1.18 This TA report is structured as follows:
- Section 2: Existing Conditions; details about the existing site and surrounding local transport network.
 - Section 3- Policy and Guidance Review
 - Section 3: Proposed Development; outlines the proposed development for the site.
 - Section 4: Development Proposals, Trip generation and development impact
 - Section 5: Summary and Conclusion; summarises the report and contains a conclusion on the assessment of the development proposals.

2.0 EXISTING CONDITIONS

Introduction

- 2.1 This section of the report outlines the existing local conditions including the provision for walking, cycling, public transport and the local highway network in the vicinity of the site.

Existing Access and HGV Routes

- 2.2 The ENRMF site is accessed from Stamford Road, approximately 1.1km south of the A47, via a gated bell mouth junction. A scheme to improve the site access has been accepted by the local authority as illustrated on drawing 1961/1/097, contained at **Appendix E**. An extract of the scheme is shown below:

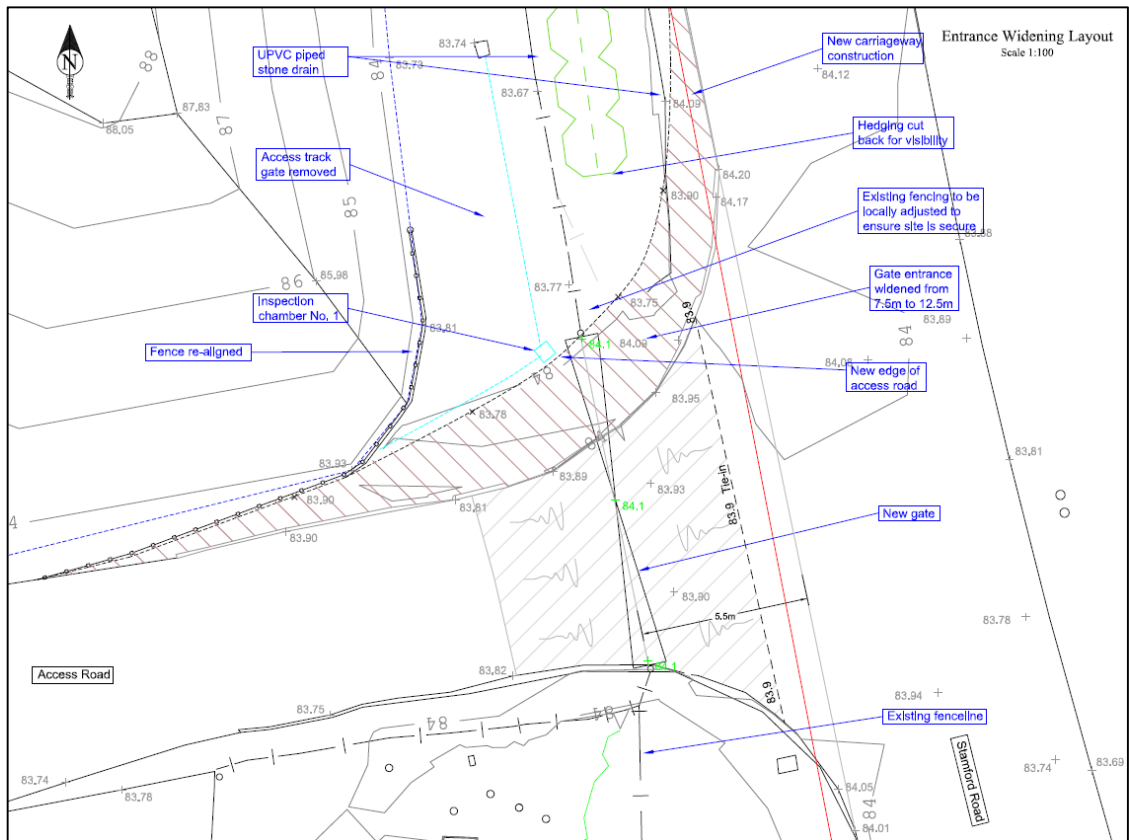


Image 2.1 – Extract of Approved Entrance Widening (dwg 1961/1/097)

- 2.3 The improvement works shown above include increasing the radii on the northern kerb line to widen the junction. The scheme also includes removal of vegetation to improve visibility and a new site entrance gate. Drainage improvements will be undertaken to prevent ponding of water in the entranceway. The improvements are not provided as mitigation in response to a direct impact from the development but are planned by the operator to improve the junction for vehicles turning left from the junction. The S.278 works

are taking place at the time of writing and will be completed shortly and therefore are considered to be committed and therefore form part of the existing conditions.

- 2.4 It is noted that the LHA had requested that these works are required by the proposed development. However these improvements will be completed prior to the commencement of the proposed extension.
- 2.5 Augean (South) Ltd is committed to maintaining Stamford Road which includes regularly road sweeping to keep the surface clean as well as an annual contribution to the LHA in an obligation in the Section 106 agreement for use for resurfacing works. A three stage wheel cleaning facility is used by all HGVs before they leave the site. A section of the carriageway adjacent to the site access has recently been resurfaced by the LHA following several requests from Augean.
- 2.6 The existing access operates with a banned right turn on exit from the site towards Kings Cliffe village, except for local deliveries. Generally all HGV movements arrive and depart to the north to and from the A47. This restriction is currently enforced through the Section 106 agreement and a proposed requirement in the DCO. Stamford Road is relatively wide (circa 7.0m wide). HGV traffic therefore enters and exits the site from the north and the A47 corridor. There are no footways or street lighting on Stamford Road in the vicinity of the site access.
- 2.7 Stamford Road joins the A47 at a priority controlled T-junction with a ghost right turn facility which is protected by central islands. There is an existing gated access to Royal Air Force Wittering directly opposite Stamford Road. During the site visit it was noted that the access to RAF Wittering had a build-up of debris suggesting this access is infrequently used or not used.
- 2.8 The A47 distributor road joins the A1 (Wansford Interchange) at a grade separated dumb bell junction (approximately 6.5km to the east of Stamford Road) which forms part the SRN. The A47 joins the A43 at an existing at grade roundabout junction (approximately 2.5km to the west of Stamford Road). The A43 continues west to Leicester.
- 2.9 To the north the A43 passes through Easton on the Hill before forming the Stamford South Junction with the A1. The junction is formed by two priority controlled T-junctions with north facing slip roads. The A43 travels south providing a connection to Corby, Kettering and the A14 corridor (approximately 30km south). The Stamford South and A43 / A14 junctions form part of the HE's SRN.

2.10 A location plan of the site in the context of the wider highway network is contained at **Appendix F**.

Non-Car Modes

2.11 Access to site by modes other than the car includes the following:

- Walking – pedestrian networks
- Cycling – cycle route networks
- Public Transport – existing bus service provision and routes

2.12 As noted above there are no footways in the vicinity of the site access. The dominant movement to the site is the import / export of waste / material to the site and clay and overburden export from the site which generate HGV trips. For a development of this type the lack of footways / cycle ways is not considered to be a constraint.

2.13 The existing public transport network has been reviewed in the vicinity of the site where it is noted that services do not currently go past or close to the site. Again this reflects the location of the site which has been chosen based on the type of development.

Existing Development Trips

2.14 The existing HGV lorry trip logs in and out of the site have been provided for the two year period between 1st January 2019 and 21st December 2020, detailed vehicle logs are contained at **Appendix G**. The data has been used to calculate the total number of HGV trips which are summarised in the table below:

HGV trips (two way)	2019	2020
Average Daily Weekday	123	104
Maximum Daily Weekday	214	180
85 th Percentile Daily Weekday	158	130
Total trips per annum	32,832	27,340
Number of weekdays operating	260	253
Number of days operating total	313	304

Table 2.1 – Summary of Existing HGV logs 2019 and 2020

- 2.15 The summary above shows the existing two-way trips, therefore the maximum daily trips equal 214 which equates to 107 HGV visits (where each vehicle arrives (=1 trip) and departs (=1 trip). It should be noted that the total number of days operating represents the total number of days where trips were logged. In 2019 this breaks down as follows:
- 254 Weekdays (excluding bank holidays);
 - 53 Saturdays (operating as 0.5 days); and
 - 6 bank holiday days (with limited trips).
- 2.16 The trip logs for the site shows that in 2019, on a weekday, there was:
- a maximum daily two way trip of 214 HGVs (107 in and 107 out).
 - an average daily two way trip of 123 HGVs (62 in and 61 out); and
 - an 85th percentile daily two way trip of 158 HGVs (79 in and 79 out).
- 2.17 The 85th percentile value has been calculated to show the variation in trips. This calculation shows that 85% of the time (or 221 days) the daily HGV trips are below 158 and for 15% of the time (39 days) daily HGV trips are between 158 and 214 trips.
- 2.18 The results recorded in 2020 show the site operated for a total of 304 days compared to 313 in 2019. This difference is due to the logs for the period between the 22nd and 31st December not being available at the time of preparing the report. In comparison the data shows:
- a maximum daily two-way trips of 180 (90 in and 90 out) which is 34 (-16%) less than in 2019;
 - an average daily two-way trips of 104 (52 in and 52 out) which is 19 (-15%) less than in 2019; and
 - an 85th percentile daily two-way trip of 130 (65 in and 65 out) which is 28 (-18%) less than in 2019.
- 2.19 The results summarised above show that the 2020 HGV trips were lower when compared to 2019. These changes are likely to be as a result of the pandemic and normal fluctuations in the operation. Therefore for the purposes of this assessment the 2019 figures have been used to estimate the existing trips. The site operates between the hours of 0700 and 1730 during the week, which equates to a 10.5 hour operating period. The operating hours have been used to estimate the existing hourly arrival rate for HGVs as summarised below:

HGV Trips (two way)	2019 Daily	2019 Hourly
Average Weekday	123	12
Maximum Weekday	214	20
85 th Percentile Weekday	158	15

Table 2.2 – Hourly HGV trips

2.20 The summary above shows that the existing operation on the site generates:

- an average of 12 two-way HGV trips (6 in and 6 out) per hour;
- a maximum of 20 two-way HGV trips (10 in and 10 out) per hour; and

2.21 In addition to HGV trips the site currently attracts up to 18 car trips for staff arriving during the morning period and up to 18 car trips for staff departing in the evening. The site operations include shift work which typically operate outside of the traditional commuter peak periods. A dedicated car park is located on site which can accommodate the expected vehicles, including visitors.

Existing Network Trips

2.22 Due to the ongoing pandemic it has not been possible to collect new traffic survey information. However the Department for Transport (DfT) permanent count database has been used obtain the daily traffic flows on the A47 (to the east and west of Stamford Road) for 2019. Permanent count site 16482 is located on the A47 between Stamford Road and the A43 Roundabout (west) and site 28790 is located on the A47 to the east of Stamford Road. The average annual daily flow (AADF) is summarised below:

DfT Site ID	Eastbound	Westbound	Total
16482 (west)	5592	5810	11402
28790 (east)	5983	5643	11626

Table 2.3 – Existing 2019 AADF flows on the A47

2.23 The 2019 traffic count data shows that there is a total traffic trip of 11,402 to the west of the site and 11,626 to the east of the site. Using the 85th percentile data (table 2.2) the existing development impact has been calculated, as follows assuming a 50 / 50 split at the Stamford Road / A47 junction:

- A47 west of Stamford road - 0.7%; and

- A47 east of Stamford Road – 0.7%

2.24 The existing impact of the site activity on the A47 is considered to be low. Typically a 5% change in traffic flow is considered to be within the daily variation on a link.

Road Safety – Stamford Road

2.25 As noted in Section 1 there is local safety concern, from residents, that mud on the road is leading to an increase in accidents on Stamford Road. If an accident occurs and it results in a personal injury a record of the accident (stats 19) will be completed by the police, where the severity of the accident will be noted as either Slight, Severe or Fatal. In addition the number of casualties, mode, conditions and causation factors are recorded. This information is collated on a personal injury accident (PIA) database. Details of these accidents can be obtained from the Local Authorities or through online databases, such as crashmap. However the PIA database does not include damage only accidents.

2.26 The PIA data is used by Local Authorities to assess whether there are any existing accident problems that need to be mitigated by an accident remedial scheme or as part of planning applications to assess whether development proposals would exacerbate an existing problem and whether mitigation is required. The Department for Transport (DfT) Guidance on Transport Assessment (2007) states that a Transport Statement / Assessment should include:

“an analysis of the injury accident records on the public highway in the vicinity of the site access for the most recent 3 year period, or five-year if the proposed site has been identified as within a high accident area”

2.27 To assess if there are any existing accident patterns / issues PIA has been reviewed on crashmap for the most recent five year period. An extract of the online map for Stamford Road is shown below:



Figure 2.1 – PIA Summary (source www.crashmap.co.uk)

2.28 The figure above shows that there have been no recorded personal injury accidents on Stamford Road, including at its junctions with the site access and the A47. However, Augean is aware of damage only accidents occurring on Stamford Road injury to which the business has acted a first responder. Details of a damage only accident, which occurred on 17th September 2020 have been provided. The accident occurred to the north of the site at the existing bends, where a vehicle left the road on the bends to the north of the site and crashed into the trees. A photograph taken at the time is shown below:



Image 2.2 – Damage Only Accident 17th September 2020

The image above shows where the vehicle came to rest. It also shows the condition of the carriageway at the time of the accident, where the centre line and edge of carriageway markings are visible, the road surface is dry and there is no mud on the road, other than debris which appears to be from the accident.

Road Safety – A47 Corridor

- 2.29 The PIA data for the A47 (between the Stamford Road junction and the A43) for the most recent five year period has been reviewed as summarised on the image below:

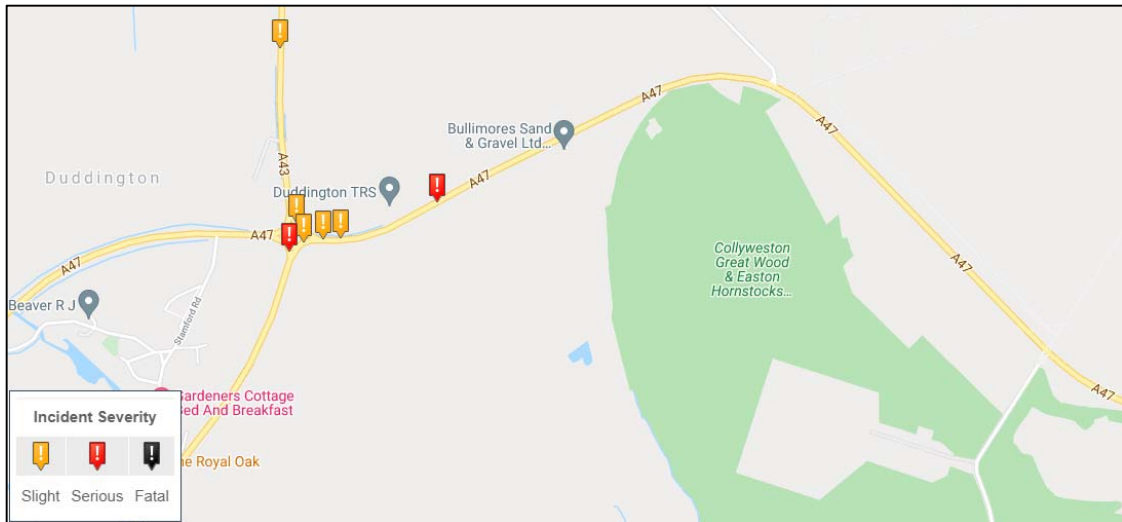


Figure 2.2 – PIA Summary A47 (west of Stamford Road) (source www.crashmap.co.uk)

2.30 Five accidents were recorded at the A47 junction with A43, of which one was serious and four were slight in severity. In addition there was one severe accident on the A47 within the vicinity of the A43/A47 junction. The accident categories in the DfT's *Reported Road Casualties in Great Britain: notes, definitions symbols and conventions* (2017) as follows:

- Slight – “an injury of a minor character such as a sprain (including neck whiplash injury), bruise or cut which are not judge to be severe, or slight shock requiring roadside attention. This definition includes injuries not requiring medical treatment”;
- Severe – “An injury for which a person is detained in hospital as an “in-patient” or any of the following injuries whether or not they are detained in hospital; fractures, concussion, internal injuries, crushing, burns (excluding friction burns), severe cuts, severe general shock requiring medical treatment and injuries causing death 30 or more days after the accident. An injured casualty is recorded as seriously or slightly injured by the police on the basis of information available within a short time of the accident”;
- Fatal – “an accident in which at least one person is killed”.

2.31 Of the six accidents occurring in the vicinity of the A47 / A43 junction, four occurred on the A47. The DfT permanent count site 16482 has been used to estimate the total flow over the five year period. This has been calculated to be 19,191,355. Based on the six accidents this would equate to an accident rate of 0.00003%. Of the remaining two accidents, one accident occurred on the A43 northern approach and one accident occurred on the A43 southern approach over the five year period. The proposed development will result in a

negligible change in trips which is not expected to impact road safety on the A47.

- 2.32 The PIA data for the A47 between the Stamford Road junction and the A1 has been reviewed as summarised on the image below:



Figure 2.3 – PIA Summary A47 (east of Stamford Road) (source www.crashmap.co.uk)

- 2.33 Ten accidents were recorded on the A47 east of Stamford Road, of which five accidents occurred at the Old Leicester Road / A47 junction. The DfT traffic count data for site 2870 has been used to estimate that there have been 20,130,115 vehicle trips. The ten accidents within this period equates to an accident rate of 0.00005%. The proposed development will result in a negligible change in trips which is not expected to impact road safety on the A47.
- 2.34 The PIA data for the A1 / A47 Wansford Interchange has been reviewed for the most recent five year period, as summarised below:

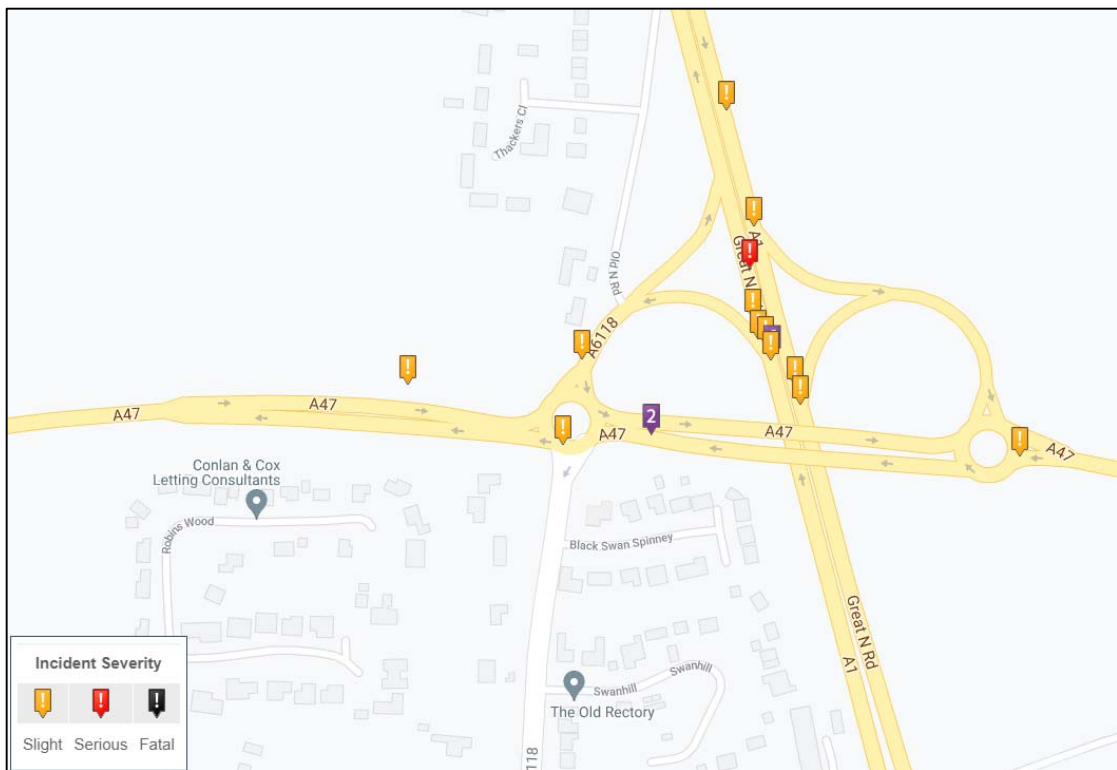


Figure 2.4 – PIA Summary A1 / A47 Junction (source www.crashmap.co.uk)

The figure above shows that there have been:

- five accidents at the western dumb bell junction, all of which were slight in severity;
- a single accident at the eastern dumb bell junction which occurred in 2018 which was slight in severity;
- ten accidents occurred at the northbound diverge of which two were serious and eight were slight in severity. The DfT permanent count site 36083 has been used to estimate the total traffic flow over the five year period as 46,636,780, which equates to an accident rate of 0.00002%;
- two accidents occurred at the southbound merge, which were slight in severity and one accident occurred at the southbound diverge, which was slight in severity. The DfT permanent count site 36083 has been used to estimate the total traffic flow over the five year period as 40,882,555, which equates to an accident rate of 0.000007%;

2.35 The proposed development will result in a negligible change in trips which is not expected to impact road safety on the A1/A47 junction.

Stamford Road Carriageway Condition

- 2.36 In 2012 Augean Plc applied to extend the East Northamptonshire Resource Management Facility, which was subsequently approved (2012 DCO). Complaints were received during the consultation process about the condition of the Stamford Road carriageway. The complaints particularly related to mud being ‘dragged’ on to the carriageway from the site, leading to concerns from members of the public that this would lead to an increase in accidents. Fairhurst prepared a report to respond specifically to these concerns (reference 86466/011), which is contained at **Appendix H**. These concerns were split into four categories:
- Highway Conditions;
 - Temporary Highway Signage;
 - Road Debris; and
 - Considerations for Improvement.
- 2.37 In total 20 comments were reviewed and responses were provided to explain how the site manages its operations to limit impact on the road network. These include:
- Requiring all vehicles exiting the site to use the three-stage wheel cleaning facility. This removes mud from vehicles before they exit the site. Although it is acknowledged that dirty water drips/drains from the vehicles as they leave, which may leave a film on the road;
 - the site operates a road sweeper which regularly sweeps the road, again this may leave a wet film on the road.
 - independent skids tests have previously been carried out which confirmed the skid resistance was above (i.e. better than) the national recommended threshold for the classification of road (including when wet);
 - If mud / debris is noted or reported this is inspected and removed, although this was noted to be infrequent.
- 2.38 In addition Fairhurst reviewed the PIA data for the most recent five year period relative to the date of the review, which showed there has not been any reported accidents within the assessment period along Stamford Road. They concluded there was not an existing road safety issue.
- 2.39 As explained earlier in this chapter the PIA data provides records of accidents which resulted in injury. However this data does not include damage only

accidents. As explained above, the most recent five year data shows that there have been no recorded accidents on Stamford Road. The Fairhurst report concluded that there was not a safety issue on Stamford Road; and there is no data since then to change this conclusion.

2.40 Since the 2012 application there have been further improvements:

- The carriageway in the vicinity of the site access has been resurfaced by the LHA (in 2020);
- a scheme to improve the access has been agreed and will be constructed in Summer 2021;
- A CCTV camera has been installed covering the site access to enable the existing operation to be monitored; and
- the operator has discussed the provision of additional signage on the Stamford Road. They have been advised that these need to be delivered by the local authority and the operator has offered to pay for these, although the offer of payment is not linked to impacts resulting from the development.

2.41 A record of the complaints relevant to traffic received over the last 5 years has been compiled along with a record of how the comments have been addressed. A summary of the details of these complaints is contained at **Appendix I**. There were no complaints regarding traffic during the period 2015-2019. In 2020 there were 7 complaints relating to mud on the road, the condition of the road and road safety. There were 2 complaints in the first 6 months of 2021 relating to road safety and queuing:

Complaint	Date	Member of Public Complaint	How it was resolved by Operator
Dust	16/08/20	Complaint mentioned that lorries are not washing their wheels resulting in dust on the highway which can block the drainage system. On occasion lorries block access to Westhay Cottages.	<p>Augean responded that ENRMF has wheel wash systems and a permanently deployed road sweeper to maintain the Stamford Road in a good state of cleanliness. When on a very rare occasion a vehicle does fail to use the wheel wash, the road sweeper is deployed rapidly to clear any material. The site operates a three-strike rule, and the driver is either reprimanded and warned on their next visit to site, or the haulier is informed of the actions of the driver.</p> <p>During periods of rainfall there may be times when some staining of the road occurs which is predominantly muddy water from the vehicles after having been through the wash system.</p> <p>Augean responded that hauliers who turn up early are parked up on site and held for 30 minutes and the drivers are warned about the consequences of turning up early. They are also re-inducted with the site rules. Their companies are informed and the site rules sent to them all regularly. Inside the site, incoming vehicles receive priority and when on occasion there are vehicles waiting to enter the site operatives manage traffic on the Stamford Road to ensure road users are able to safely use the road. Augean stated that they were planning to improve</p>

Complaint	Date	Member of Public Complaint	How it was resolved by Operator
			<p>the site entrance to further reduce potential issues relating to traffic entering or leaving site.</p> <p>Augean requested that the complainant report any incidents of any vehicles not adhering to the site rules so that the matter is followed up and also invited the complainant to a site visit</p>
Mud on Road	13/10/20	Complaint received regarding mud on the road which could result in an accident.	<p>Augean explained that measures were in place to keep the road clear, including wheel washing (pressure washers) and road sweeping, which may leave a 'dirty water' on the road. The complainant felt the road sweeper could be more effectively used.</p> <p>The road was inspected and was found to be free of mud and debris. A puddle at the site entrance was found which was cleared.</p>
	15/10/20	Complaint received regarding mud on the road which could result in an accident.	
Slippery Road	16/10/20	Complaint received regarding slippery conditions outside the site.	Augean explained that the road sweeper had just been out. The site access was inspected and was considered to be acceptable. They were informed that the road sweeper was out continuously which was deemed acceptable by the complainant.

Complaint	Date	Member of Public Complaint	How it was resolved by Operator
Spill / Mud on Road	21/10/2020	Complaint received regarding a potential spill on the road or that mud was being dragged out from the site which was causing hazardous conditions	The road was inspected and there was no spillage on the road. It was explained that there were measures to clean vehicle prior to them leaving the site, which can lead to dirty water being carried from the site.
Condition of road surface	21/10/2020	Complaint received regarding scarring on the road which may be hazardous to small vehicles/bikes. Suggested additional signs.	Although noted it was explained that the maintenance was the responsibility of the highway authority. Augean agreed to look into the possibility of additional signage and to continue to press NCC for the repairs to Stamford Road. The Complainant was pleased with the response.
	27/10/2020	Complaint received regarding the recent car incidents on the Stamford Road and what Augean were doing to prevent these from occurring. Road surface / wheel washing and signage were noted as possible causation factors.	<p>It was explained that this was a Highway Authority responsibility and that Augean had been chasing NCC to carry out the repairs which it contributed towards as part of its obligations. Augean confirmed that they operate wheel cleaning facilities and regularly swept the road.</p> <p>Augean have subsequently liaised with North Northamptonshire Council (NNC) who have advised that any signs must be installed by NNC. Augean have indicated they would fund the signs.</p>

Complaint	Date	Member of Public Complaint	How it was resolved by Operator
Mud on Road	10/11/2020	Complaint received regarding mud on road.	Site access was inspected along with complainant where it was agreed it was dirty water not mud.
Vehicle Exiting Jct	7/1/2021	Complaint received regarding a lorry exiting the site which led to an approaching vehicle making an emergency stop.	<p>Augean were able to identify the incident using the CCTV camera which covers the site access. The HGV exiting the site was identified and the haulage company was contact to make them aware.</p> <p>In addition works to improve the access have been approved by the local highway authority, which are programmed to be implement in the coming weeks.</p>
Congestion	5/2/2021	Augean was made aware by the Parish council that a compliant had been made on the community facebook page regarding safety. The complaint relate to a member of the public waiting (for 15 minutes) behind a queue of HGVs waiting to enter the site. The member of the public overtook the HGV's on the opposing carriageway lane.	Augean reviewed the incident using the CCTV camera which covers the site access. It was acknowledged that there was a busy period (0700-0718), which was being managed by an experienced traffic controller. During this time two cars headed south towards the site which were safely managed by the person controlling the traffic.

Table 2.4 – Summary of Complaints in 2020/21

The details of the complaints summarised in Table 2.4 show that 6 of the 7 complaints were received between the 13th October and the 10th November 2020. Having reviewed the detail the following concerns have been raised:

- Condition of the carriageway at the site access -As noted in Augean's response the resurfacing works are the responsibility of the LHA and are the purpose of the annual contribution from Augean. These works have now been completed by NNC. It is considered that this has addressed the surfacing concern as well and the ponding which occurred;
- Mud On Road – a number of complaints have been received regarding the perception of mud on the road which is generally dirty water being carried onto the highway network. Augean manage vehicles exiting the site by operating:
 - A wheel wash facility and pressure washers to clean the wheels and chassis of vehicles leaving the site;
 - A road sweeper which regularly cleans the road.
- Signage – complainant suggested improved signage. Augean has liaised with NNC regarding the procurement of additional signs, particularly on the approaches to the bends (located to the north of the site on Stamford Road). NNC have explained that these would need to be provided by the highway authority. Augean have responded that although the signage is not needed as a result of the operations at the site, they would pay for the additional signage.

2.42 It is considered that the summary above demonstrates that Augean is actively managing their operations to reduce any perceived or actual impacts associated with traffic. When complaints are raised Augean reviews the complaint then responds to explain and plan (if necessary) how they can be resolved. Examples of this are their ongoing contribution for highway maintenance, offer to contribute towards the provision of additional signs and as noted earlier in this section the proposals which are in progress to upgrade their existing access / egress.

3.0 POLICY & GUIDANCE REVIEW

Introduction

3.1 This section reviews the national and regional policy as it relates to transport. The following documents have been considered:

- National Planning Policy Framework – NPPF (2021)
- National Planning Practice Guidance (NPPG) – (2019)
- National Policy Statement for Hazardous Waste (2013)
- Northamptonshire Minerals and Waste Local Plan (adopted July 2017)
- Communities and Local Government – Guidance on Transport Assessments (March 2007)
- Highways Agency – Protocol for Planning Development (2012)

National Planning Policy Framework (July 2021)

3.2 A revision to the 2012 National Planning Policy Framework (NPPF) was published in July 2018. NPPF (2018) and was subsequently updated in February 2019 and most recently in July 2021 including changes to planning policy and legislation to bring forward more land for development and investment in infrastructure.

3.3 Part d of paragraph 11 specifies that for decision-taking this means where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:

- the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

3.4 Paragraph 105 states that *“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health. However, opportunities to maximise sustainable transport*

solutions will vary between urban and rural areas, and this should be taken into account in both plan-making and decision-making.”

- 3.5 Paragraph 110 states that “In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
- a) *Appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) *Safe and suitable access to the site can be achieved for all users; and*
 - c) *Any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”*
- 3.6 Paragraph 111 states that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

National Planning Practice Guidance (October 2019)

- 3.7 The National Planning Practice Guide (NPPG) was updated in October 2019 and aims to provide an accessible web-based source for all national planning guidance. In the section relating to Travel Plans, Transport Assessments and Statements, the NPPG defines Transport Assessments and Statements as documents which:

“... are ways of assessing the potential transport impacts of developments (and they may propose mitigation measures to promote sustainable development. Where that mitigation relates to matters that can be addressed by management measures, the mitigation may inform the preparation of Travel Plans).”

- 3.8 The NPPG also discusses the relationship between Transport Assessments and Travel Plans:

“Transport Assessments and Transport Statements primarily focus on evaluating the potential transport impacts of a development proposal. (They may consider those impacts net of any reductions likely to arise from the implementation of a Travel Plan, though producing a Travel Plan is not always required). The Transport Assessment or Transport Statement may propose mitigation measures where these are necessary to avoid unacceptable or “severe” impacts. Travel Plans can play an effective role in taking forward those mitigation measures which relate to on-going occupation and operation of the development.”

3.9 The NPPG identifies key principles governing the production of these documents stating that they should be:

- *proportionate to the size and scope of the proposed development to which they relate and build on existing information wherever possible;*
- *established at the earliest practicable possible stage of a development proposal;*
- *be tailored to particular local circumstances (other locally-determined factors and information beyond those which are set out in this guidance may need to be considered in these studies provided there is robust evidence for doing so locally); and*
- *be brought forward through collaborative ongoing working between the Local Planning Authority / Transport Authority, transport operators, Rail Network Operators, Highways Agency where there may be implications for the strategic road network and other relevant bodies. Engaging communities and local businesses in Travel Plans, Transport Assessments and Statements can be beneficial in positively supporting higher levels of walking and cycling (which in turn can encourage greater social inclusion, community cohesion and healthier communities).*

The Department for Environment, Food and Rural Affairs - National Policy Statement for Hazardous Waste (NPS) (adopted 2013)

3.10 The NPS sets out the Government policy for the hazardous waste infrastructure, which is to be used by the Secretary of State as the primary basis for decisions on development consent applications for hazardous waste infrastructure that fall within the definition of a Nationally Significant Infrastructure Project (NSIP).

3.11 Section 5.13 describes the requirements for the traffic and transport impacts, which states:

“if a project is likely to have significant transport implications, the applicant’s ES (see section 4.2 should include a transport assessment, using the NATA/WebTAG methodology stipulated in Department for Transport guidance or an successor to such methodology. Applicants should consult with Highways Agency and/or the relevant highway authority, as appropriate, on the assessment and on mitigation measures.

Communities and Local Government – Guidance on Transport Assessments (GTA) (March 2007)

- 3.12 The GTA guidance provide threshold for when a Transport Assessment or a Transport Assessment is required. Although no specifically including waste site it sets out what should be included within a Transport Assessment or Transport Statement and that the content should be scoped with the relevant local authorities.

Northamptonshire Minerals and Waste Local Plan (adopted July 2017)

- 3.13 The Minerals and Waste Local Plan sets to the strategy of how development will be assessed and managed within the local plan period (up to 2031).

- 3.14 Paragraph 5.15 states:

“the ENRMF located at Kings Cliffe, Northamptonshire is a hazardous waste disposal (landfill) and treatment facility; this facility has a national catchment and is one of few such facilities in the Country”

- 3.15 Paragraph 5.20 states:

“there are very few facilities currently available within the UK to dispose of LLW, one of these is the ENRMF in Kings Cliffe, Northamptonshire, others include Clifton Marsh in Lancashire and Lillyhall in Cumbria. The ENRMF is also used to dispose of hazardous wastes and treat contaminated soils, for which it has a national catchment.”

- 3.16 Policy 10 details how the growth need will be met which states:

“This provision will come from a mix of extensions to existing sites, intensification or re-development of existing sites and new sites, providing they all meet the spatial strategy for waste management and are assessed as meeting environmental, amenity and other requirements.”

- 3.17 Policy 11 identifies that advanced treatment facilities with a sub-regional or wider catchment, will be focused within the central spine and the sub-regional centre of Daventry. Development should be concentrated in Northampton, Wellingborough, Kettering, Corby and Daventry.

- 3.18 Policy 19 states:

“Minerals and waste related development should seek to minimise transport movements and maximise the use of sustainable or alternative transport modes. Where possible minerals and waste related development should be located, designed and operated to enable transport by rail, water, pipeline or conveyor.

Minerals and waste related development should be well placed to serve their intended markets or catchment area(s) in order to minimise transport distances and movements in order to support the development of sustainable communities that take responsibility for the waste that they produce and work towards self-sufficiency.

Proposals for new development or development that would result in a significant increase in transport movements should include a sustainable transport statement to demonstrate how the above has been taken into consideration. “

- 3.19 CCE have actively engaged with NH and HE to scope the assessment of the extension of the existing facility at King’s Cliffe, where it has been accepted by NH and HE that the development proposals do not result in a significant increase in transport movements therefore no offsite highway assessment is required. In addition NH considered the connectivity of the site and concluded that this was acceptable.

HA – Protocol for Planning Development

- 3.20 Highways England (formally Highways Agency prepared the ‘Protocol for Planning and Development’ which provide guidance on when there is a need to assess the Strategic Road Network. It states that:
- *“for developments generating more than 30 two-way trips to the network during any peak period, a transport assessment and travel plan prepared in accordance with DfT and DCLG’s Guidance on transport assessments and meeting the requirements of DfT Circular 02/2007.*
- 3.21 It is noted that DfT circular has been replaced with circular 02/2013.
- 3.22 Details of the proposed vehicle trip attraction were presented to NH and HE as part of pre-application scoping. The trips associated with the development proposals are significantly less than 30 trips during any peak period at the site access. Once distributed into the road network the impact of the development will further dilute. It has therefore been accepted by NH and HE that no assessment of the offsite highway network is required.

4.0 PROPOSED DEVELOPMENT AND IMPACT

Introduction

- 4.1 This section describes the development proposals, impacts and improvements required to mitigate the impacts of the development.

Development Proposal

- 4.2 The proposed development comprises the construction of new landfill void to the west of the currently consented hazardous waste and LLW landfill area (the western extension) and the alteration of the restoration profile and the timescale for completion of the existing landfill site in order to integrate the final landscape of the existing site with the western extension. The application includes an increase in the consented throughput of waste to the waste treatment and recovery facility and an increase in the total input rate to the site. In order to construct the western extension void it will be necessary to win and work minerals including the extraction of soils, overburden and clay. The soils and some clay will be retained on site for use in site restoration and the construction of the low permeability engineered liner and capping layers. The remaining materials will be exported off site. The application includes the alteration of the operational period of the current site activities and the western extension to 2046. A summary of the proposed development is presented below:

- The construction of new landfill void for the disposal of the same range of hazardous wastes and low level radioactive waste (LLW) disposed of at the site currently with a capacity of greater than 100,000 tonnes per annum (tpa) supported by the existing site infrastructure. The new landfill will comprise a number of phases and provide a landfill void of approximately 2.5 million cubic metres;
- The continuation of filling of the existing ENRMF landfill with hazardous waste and LLW the subject of the current DCO and the amendment of the consented restoration profile to tie the existing landfill in to the proposed extension landform. The amendment to the restoration profile will result in the creation of new void at the existing site;
- The winning and working of minerals in order to create the landfill void and provide extracted materials for use on site as well as the exportation of clay and overburden for use in engineering, restoration and general fill at other sites;
- The stockpiling of clay, overburden and soils for use in the construction of the engineered containment system at the site and restoration of the site;

- The direct input of waste into the existing and new landfill will continue at a rate of up to 150,000tpa;
- An increase to the waste throughput of the waste treatment and recovery facility to 250,000tpa which comprises an increase of 50,000tpa compared with the rate consented in the 2018 DCO amendment.;
- A combined total waste importation rate limit to site including that to the waste treatment and recovery facility and to the landfill of 300,000tpa which is an increase of 50,000tpa compared with the currently consented total input rate;
- The operational hours of the site will not change from those already permitted;
- Restoration to generally domed restoration landforms in the extension area and amendment to the approved restoration profile of the existing ENRMF site to create a coherent restored landform over the whole application site;
- Restoration of the site to nature conservation interest using the soils available at the site as well as suitable imported materials; and
- Completion of the landfilling and restoration operations by December 2046.

Vehicular Impact

- 4.3 The existing operation on the site was granted a DCO SI 2013 No.1752 in July 2013. As part of the supporting documents the methodology for calculating the HGV trips was agreed. The 2012 maximum trip generation methodology, agreed as part of the 2013 consent along with site operation data from 2019 has been used to estimate the maximum number of trips associated with the with proposals, which are summarised below, a copy of the calculation is contained at **Appendix J**.

	2012 Traffic Assessment	2021 Traffic Assessment	Change
Total HGV	196 / day	232 / day	+36 per day

Table 3.1 – HGV trip generation

- 4.4 The table above shows that the proposed site could generate up to 232 HGV trips per day, which is an increase of 36 trips a day when compared to the trips assessed in the 2012 impact assessment. In order to estimate the hourly impact it is assumed that the site operates for a 10.5 hour period which would result in

an hourly increase of four vehicle trips. It is noted that the maximum trips summarised are different to the existing vehicle logs described in Section 2, which are generally lower. Therefore the 2012 forecast methodology is considered to be robust and a similar method has been applied to estimating the traffic associated with the proposed development.

- 4.5 The daily impact of these trips has been calculated using the 2019 DfT permanent count data for sites 16482 and 28790 in order to demonstrate that the impact from the proposals are negligible. The permanent count data will include the trips associated with the current operation of the site. For this assessment it is assumed that HGV trips are distributed 50% left and 50% right at the Stamford Road / A47 Junction. The results of the link assessment are summarised below:

DfT Site ID	Two way movements	Proposed Development	% Impact
16482 (west of Stamford Road)	11402	18	0.16%
28790 (east of Stamford Road)	11626	18	0.15%

Table 3.2 – Development Impact (A47 Corridor)

- 4.6 As summarised above the impact of the proposed trips is significantly less than 1% on the A47 either side of the Stamford Road Junction. Once distributed onto the wider network these trips will dilute further and the impact will reduce. The development will therefore not have a material impact on the operation of the adjacent highway network or at the A1 junctions with the A43 and the A47.
- 4.7 The trip generation and proposed increase in HGV trips was presented in the Scoping Note prepared by CCE. This was submitted to NH and HE for consideration where they were satisfied that the trips associated with the proposed development would not result in a severe impact, as set out in the National Planning Policy Framework (NPPF) and HE’s Protocol for Planning Development. The HE’s Protocol identifies that an assessment of the SRN is required if the development proposals result in an increase of 30 trips through the junction in the AM or PM peaks. As the proposed development will result in four trips in the AM and PM peak hours no further assessment was required by NH and HE.

Site Access & Committed Improvement

- 4.8 As described in Section 1, NH has requested that the site access improvement works should be secured by requirement if they have not been constructed prior to the DCO Examination. These improvement works are shown on drawing 1961/1/097 and an extract of the improvements is shown below:

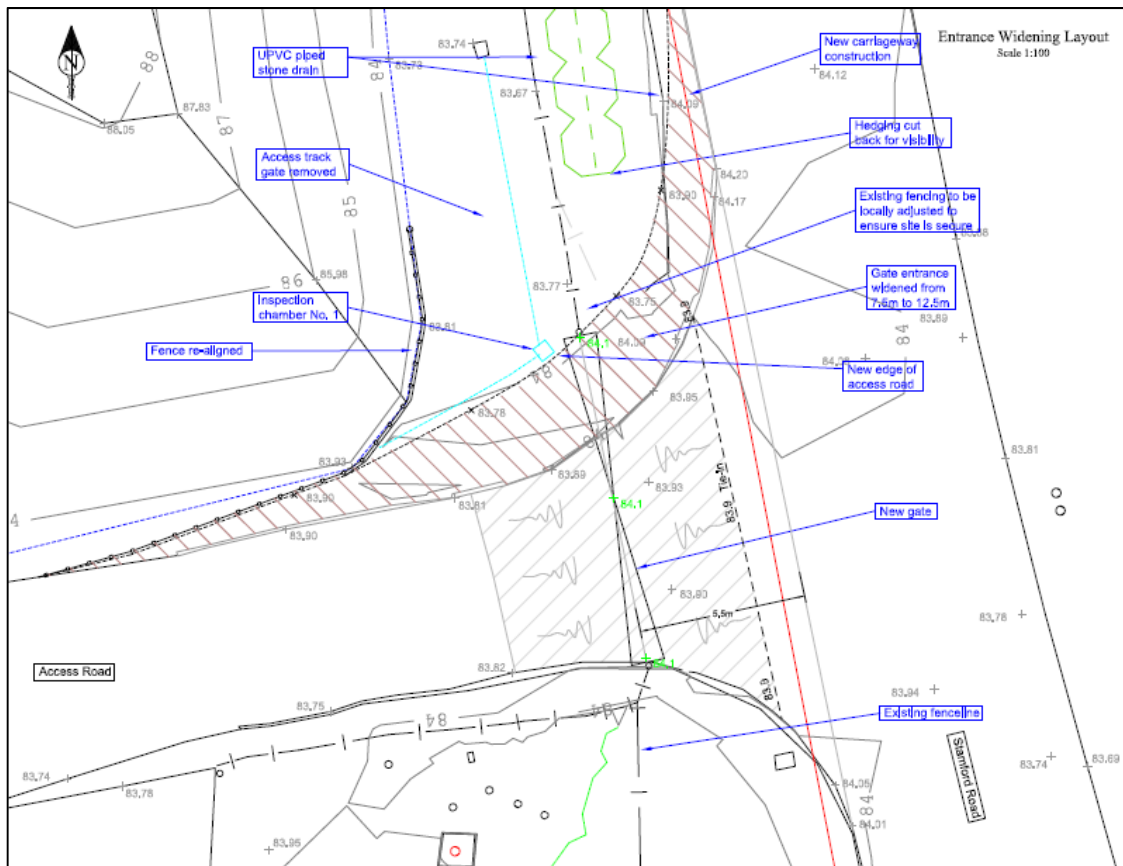


Image 3.1 – Committed Site Access Improvements

- 4.9 As described in Section 2 the improvement works shown above include widening the northbound kerb line to improve vehicle egress from the site and drainage in the site in the entranceway. These works have been agreed as part of planning reference 19/00002/WASNMA and have been offered by the operator to improve access and not as a highway need to mitigate any traffic or transport impacts. These works are currently in progress (at the time of writing) and will be in place prior to the commencement of the operations in the western extension which are being considered as part of this application.

Walking / Cycling and Public Transport Connectivity

- 4.10 As described in Section 2 there are no footways, cycleways or bus stops/services within the vicinity of the site, reflecting its rural location. NH, in reviewing the scoping note, accepted that although the accessibility by

sustainable modes (walking, cycling and public transport) was poor, they would not have a highways reason for objection given the type of development and the proposed development being applied for, which is predominantly HGV based and will use the highway network.

Parking

- 4.11 The site includes a parking area for staff which can accommodate the expected demand. As noted above it is not predicted that staff numbers will change and therefore no changes to the car parking arrangements are considered necessary.
- 4.12 Once the site is restored at the end of its operation a small car park area will be provided for visitors using the site for amenity. The size of the car park will be agreed with North Northamptonshire Council. The daily visitor numbers to the site once restored are expected to be low hence the expected trip attraction will be considerably less than the current or proposed operations and any associated impact will be low.

Delivery and Servicing

- 4.13 The development proposals will result in increased HGV trips which will be managed via Augean (South) Ltd's formal booking in system. A scheme to improve the site access has been accepted and will be constructed prior to the implementation of this proposal. The scheme widens the junction for left turning vehicles which has been accepted.

5.0 SUMMARY AND CONCLUSIONS

Summary

- 5.1 The proposed development comprises a western extension to the site, which will continue the operations at the site for a further 20 years up to 2046. In addition it is proposed to change the total import of materials associated with the waste treatment and recovery facility to increase the throughput from 200,000 and 250,000 tpa. The overall input rate to the site will increase from 250,000 tpa to 300,000 tpa.
- 5.2 The existing conditions have been reviewed where it is noted that the sustainable connectivity (by walking, cycling and public transport) to the site is poor. However this reflects the development type, location and national catchment area. Northamptonshire Highways has been consulted and are satisfied that on this occasion it is acceptable.
- 5.3 Complaints received from members of the public have been reviewed, including the responses provided by Augean. The complaints included:
- The condition of the carriageway at the site access, which has subsequently been resurfaced;
 - Mud on the road, which is the result of dirty water being carried onto the road as a result of the wheel washing facility rather than mud/debris and
 - Road safety / signage, where Augean have offered to pay for additional signage on the bends.
- 5.4 A review of the Personal Injury Accident data for the most recent 5 year period has been carried out. The data shows there have been no recorded injury accidents on Stamford Road or associated with the development access. A wider review of the A47 corridor does not indicate any safety problems. The trips associated with the proposals are low and will not have a material impact on the existing safety of the road network within the study area.
- 5.5 The proposed development will lead to an increase of 36 two way HGV trips (18 in and 18 out) per day which equates to an hourly increase of up to 4 vehicle trips per hour (2 in and 2 out). This increase in HGV trips has been reviewed by Northamptonshire Highways and Highways England who are satisfied that the proposals would not result in a severe impact.
- 5.6 The trips associated with the development are actively managed with a booking in system and agreed vehicle routing (to and from the A47 corridor), therefore providing mitigation to limit any potential impacts. The additional trips associated with this proposal will be managed using this process.

- 5.7 A review of the relevant transport planning policies and guidance has been undertaken and set out within this TA. In summary, the following elements as set out within the National Planning Policy Framework (NPPF) have been addressed:
- Paragraph 109 states that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. “
- 5.8 The NPS sets out the Government policy for Nationally Significant Infrastructure Projects (NSIP), where it requires a Transport Assessment (TA) to be carried out where the development proposals are likely to have significant transport implications. The scope of the TA has been discussed with NH and HE, in accordance with NSIP guidance, where it was agreed that no capacity assessment of the wider highway network was required. This TA has been prepared in accordance with the agreed scope.

Conclusion

- 5.9 The Transport Assessment demonstrates that the traffic impacts resulting from the proposals would not have a material impact on the highway network, which has been agreed with NH and HE. As such the transport impacts of the development are not considered to be ‘severe’ as prescribed in NPPF.
- 5.10 CCE consider that this TA demonstrates that the development proposals are acceptable in terms of highways and transportation issues.

Appendix A
May 2020 Initial Northamptonshire County Council Scoping Response

Dean Smy

From: xxx, Stuart <xxxx@xxxx.co.uk>
Sent: 11 May 2020 10:21
To: Paul xxx
Subject: RE: East Northants Resource Management Facility

Hi Paul,

I would like to confirm that there is no pre app fee from the LHA.

The LHA would look for the following when reviewing a transport statement:

Routes in which the traffic to the site is used.
Width of the roads that could cause concern if exacerbated.
What the current access is like and if this would need improvements.
Will the staff numbers increase? Will there be additional parking to help with this?
Sustainable links .
Bus stops in the area for workers who may not drive.

The LHA does not accept traffic counts undertaken within the following periods:

- Months January and December
- During school holidays or one week either side of those dates.

And of course at current with the Covid-19 issue that we are facing.

I do hope this helps and if you need any more information please let me know.

Regards,
Stuart

From: Paul Tesh [xxxxx@xxxx.co.uk] **Sent:** 07 May 2020
12:23
To: xxxx
Subject: RE: East Northants Resource Management Facility

Stuart,

Thanks for getting back to me. At the moment information is limited as the proposals are still being worked through but it is essentially an extension of Augean's waste disposal site to the north of Kings Cliffe to extend the site's life with tonnages, and therefore traffic movements, to be maintained at current pre-lockdown levels. I've attached a preliminary plan showing the site's current area of activities and the proposed extension area. I must stress that this is a very preliminary plan and may change as the proposals are refined.

I would like to confirm with you is there a pre-app fee as I would like to start discussions with you on the scope of the transport statement that will be required to support the application so that I can start making arrangements for traffic counts for when flows are normalised.

At present all HGV traffic for the site comes from/goes to the A47 to the north of the site.

Regards
Paul

Director

Tesh Consultants Ltd

54 Hanson Avenue
Shipston on Stour
Warwickshire
CV36 4HS

From: _____ **Sent:** 07
May 2020 11:25
To: _____
Subject: East Northants Resource Management Facility

Hi Paul,

Do you have any information that you are able to send over to myself so that I can take a look at this?

Regards,

Development Management Engineer

Northamptonshire Highways
One Angel Square
Angel Street
Northampton
NN1 1ED

;

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Appendix B
March 2021 Revised Scoping Note

**ZB791 – ENRMF Augean Waste
Scoping Note – Waste Extension
For Augean Group
March 2021**

1 Introduction

1.1 The East Northants Resource Management Facility (ENRMF) site is located to the south of the A47 in Kings Cliffe, PE8 6XX. The site, operated by Augean South Ltd, comprises an active hazardous waste and low level radioactive waste landfill site including a waste treatment and recovery facility. The location of the site is shown below:



Image 1.1 – Existing Indicative Site Location (image source www.google.com/maps)

Existing Use

1.2 The current operations at the site are due to run until 2026. The site was subject to a Development Consent Order (DCO) SI 2013 No.1752 (dated July 2013). The 2013 DCO contains 2 works orders which cover the following:

- Works 1 – Hazardous waste landfill facility for the disposal at direct input rate of up to 150,000 tonnes per annum (tpa) of hazardous waste and low level radioactive waste;
- Works 2 – Soil treatment facility with a consented capacity of 150,000 tpa of contaminated materials comprising predominantly hazardous wastes.

1.3 In 2018 an amendment order was approved to increase the consented capacity of the soil treatment facility by 50,000 tpa to 200,000 tpa.

- 1.4 The site was visited on the 11th December 2020 to observe traffic movements, the operation junctions and the existing conditions of the road. Although the current pandemic has affected baseline traffic it has not affected the HGV operations associated with the site. The Stamford Road / A47 junction was observed between the hours of 0900 and 1000 to determine a broad distribution of HGV movements.

Development Proposals

- 1.5 The proposed development comprises a western extension to the site, which will enable the site to continue to operate for a further 20 years up to 2046. To construct the western extension it will be necessary to win and work minerals, which includes the extraction of soils, overburden and clay. Whist soil and some of the clay will be retained on site all other material will be exported off site.
- 1.6 It is proposed to amend the total import of materials to increase the waste treatment and recovery facility to increase the throughput from 200,000 and 250,000 tpa. As such the overall input rate to the site will increase from 250,000 tpa to 300,000 tpa. The proposed increase of throughput will lead to an increase of 36 two way HGV trips per day which equates to an hourly increase of up to 4 vehicles per hour.

Scoping

- 1.7 A scoping note was prepared by MJCA and submitted to the inspectorate. Highways England (HE) were consulted on the scoping note, providing formal comments dated 17th July 2020. In their response they noted that the proposals were likely to lead to an increase in HGV movements and that they would require the proposed increase of trips to be quantified, including the impact on the Strategic Road Network (SRN). The nearest point of impact of development traffic on the SRN is the A1 junction with the A47 and the A1 junction with the A43.
- 1.8 Based on the low impact of the proposed development it is not considered that an assessment of these junctions or mitigation is required.
- 1.9 Northamptonshire County Council (NCC) were contacted by Tesh Consultants on behalf of Augean Limited to discuss the scope of the assessment. Northamptonshire Highway responded on the 11th May 2020 to make the following comments:
- The existing and proposed traffic routes should be identified;
 - Width of roads which could cause concern if exacerbated by proposed development;
 - The form of the current access and whether mitigation is required;
 - Identify the existing staff and car trips and the need for additional parking;
 - Identify the existing and proposed HGV movements;
 - Review of sustainable connectivity;

- 1.10 It is understood that there are local concerns relating to the impact of HGV movements from the development on the road construction and from soil and debris on the road.
- 1.11 This Scoping Note has been prepared to build on the earlier scoping note and discussions with the Local Authorities, in particular to present estimations for the likely highway impacts.

2 Assessment Methodology

Existing Access and HGV Routes

- 2.1 The East Northants Resource Management Facility (ENRMF) site is accessed from Stamford Road, approximately 1.1km south of the A47, via a priority controlled T-junction. A scheme to improve the existing junction has been accepted by the local authority as illustrated on drawing 1961/1/097, contained at Attachment 1. The improvement includes works to the northern kerb-line increasing the radii for left turning vehicles. Although not implemented the junction improvements will be completed prior to the commencement of the proposals considered in this Scoping Note.
- 2.2 The existing ENRMF site is committed to maintaining Stamford Road which includes regularly road sweeping to keep the surface clean as well as contributing to resurfacing works. A section of the carriageway adjacent to the site access has recently been resurfaced.
- 2.3 The existing access operates with a banned right turn. All HGV movements arrive and depart to the north and the A47 corridor. Stamford Road is relatively wide (circa 7.0m wide). There are no footways or street lighting.
- 2.4 Stamford Road joins the A47 at a priority controlled T-junction with a ghost right turn facility which is protected by central islands. There is an existing access to Royal Air Force Wittering directly opposite Stamford Road. During site visits it was noted that the access had a buildup of debris suggesting this access is infrequently used.
- 2.5 The A47 distributor road joins the A1 (Wansford Interchange) at a grade separated dumb bell junction (to the east) which forms part of Highways England's (HE) Strategic Road Network (SRN). The A47 joins the A43 at an existing at grade roundabout junction to the west and continues to Leicester.
- 2.6 To the north the A43 passes through Easton on the Hill before forming the Stamford South Junction with the A1. The junction is formed by two priority controlled T-junctions with north facing slip roads. The A43 travels south providing a connection to Corby, Kettering and the A14 corridor (approximately 30km south). The Stamford South and A43 / A14 junctions form part of the HE's SRN.

Sustainable Modes

- 2.7 As noted above there are no footways in the vicinity of the site access. The dominant movement to the site is the import / export of waste / material to the site which generate HGV movements. For a development of this type the lack of footways / cycle ways is not considered to be a constraint.
- 2.8 The existing public transport network has been reviewed in the vicinity of the site where it is noted that services do not currently go passed or close to the site. Again this reflects the location of the site which has been chosen based on the type of development.

Existing Traffic Movements

2.9 The existing HGV lorry movement logs in and out of the site have been provided for the 2 year period between 1st January 2019 and the 21st December 2020. The data has been used to calculate the total number of trips per annum, average weekly movements, average weekday movements and maximum daily HGV movements, which are summarised in the table below:

HGV Movements (two way)	2019	2020
Average Daily Weekday	123	104
Maximum Daily Weekday	214	180
85 th Percentile Daily Weekday	158	130
Total movements per annum	32,832	27,340
Number of weekdays operating	260	253
Number of days operating total	313	304

Table 2.1 – Summary of Existing HGV logs 2019 and 2020

2.10 It should be noted that the total number of days operating represents the total number of days where movements were logged. This breaks down as follows:

- 254 Weekdays (excluding bank holidays);
- 53 Saturdays (operating as 0.5 days); and
- 6 bank holiday days (with limited movements).

2.11 The movement logs for the site shows that in 2019, on a weekday, there was:

- a maximum daily two way movement of 214 HGV's.
- an average daily two way movement of 123 HGV's; and
- an 85th percentile daily two way movement of 158 HGVs.

2.12 The 85th percentile value shows that 85% of the time (or 221 days) the daily HGV movements are below 158 and for 15% of the time (39 days) daily HGV movements are between 158 and 214 movements.

2.13 The results recorded in 2020 are lower, which may be the results of fluctuations in operation or as a result of the pandemic. Therefore for the purposes of this review the 2019 figures have been used to estimate the existing movements. The site operates between the hours of 0700 and 1730 during the week, which equates to a 10.5 hour operating period. The operating hours have been used to estimate the hourly arrival rate for HGVs as summarised below:

HGV Movements (two way)	2019 Daily	2019 Hourly
Average Weekday	123	12
Maximum Weekday	214	20
85 th Percentile Weekday	158	15

Table 2.2 – Hourly HGV movements

- 2.14 The table above shows the estimated hourly movements to be between 12 and 20 two-way HGVs.
- 2.15 In addition to HGV movements the site currently attracts up to 18 car trips for staff arriving during the morning period and up to 18 car trips for staff departing in the evening.

Proposed Development Trips HGVs

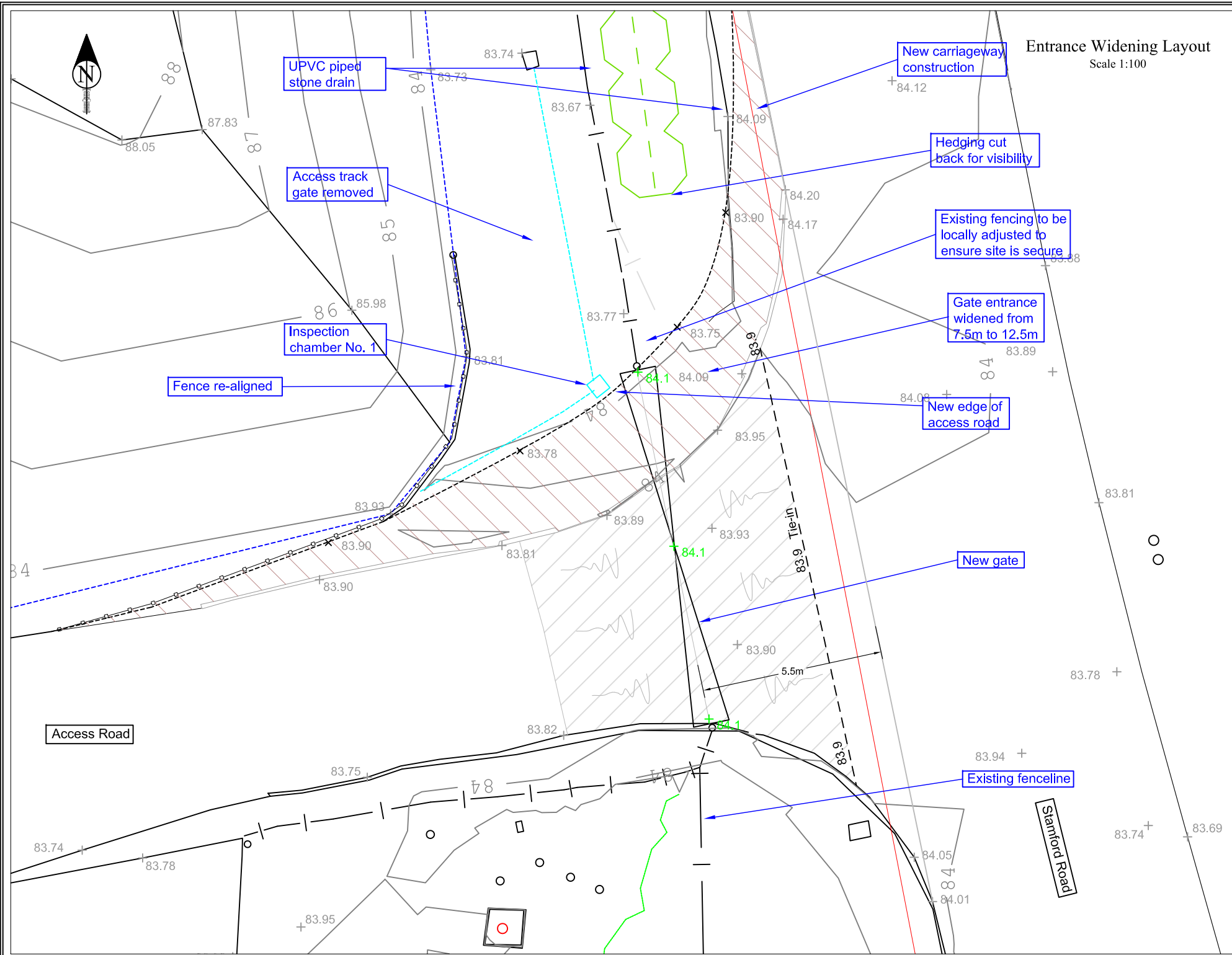
- 2.16 The 2012 maximum trip generation methodology, agreed as part of the 2013 consent along with site operation data from 2019 has been used to estimate the maximum number of trips associated with the with proposals. A copy of these calculations is contained at Attachment 2. The trips associated with the proposed development have been compared to the 2012 maximum permitted trip generation where it is estimated that there will be a daily increase of 36 two way HGV movements per day which equates to a maximum of 4 per hour.
- 2.17 Once distributed on the wider highway network the number of trips will dilute further and there will not be a material impact on the adjacent highway network or at the A1 junctions. It is therefore considered that no assessment of the offsite junction is required.

Proposed Development Trips Staff

- 2.18 The review of the existing operations show there are 18 staff movements in the morning period and 18 staff movements in the evening peak. The staff numbers will not change as a result of the proposals.

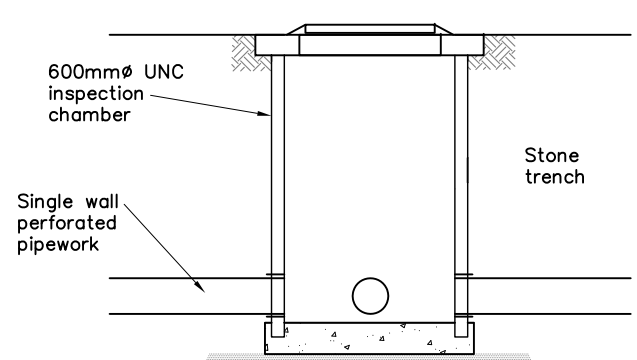
Attachment 1

Approved Site Access Improvement Drawing

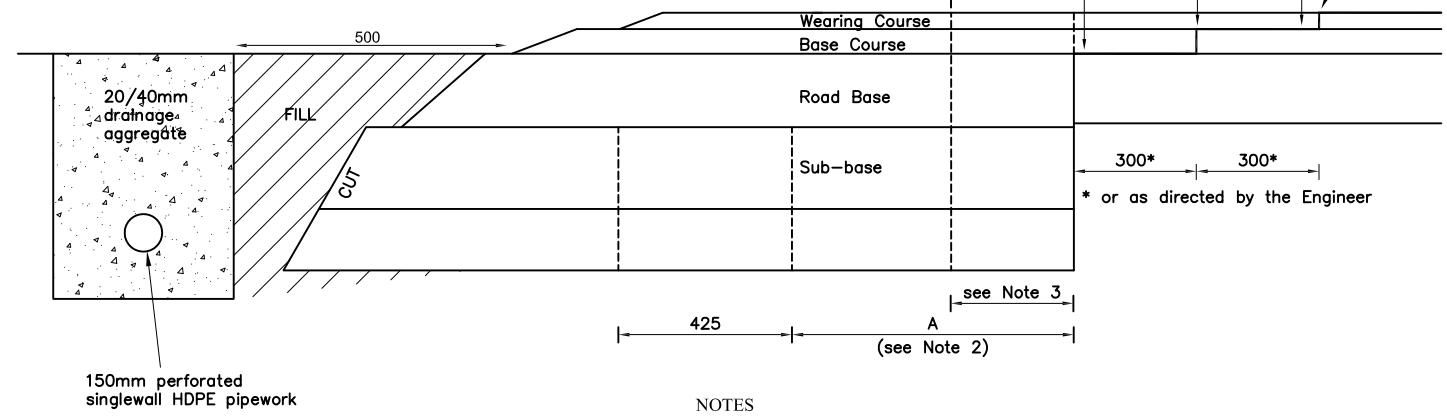


Key

	Surfacing to be removed / replaced / added to
	New road widening surfacing
	Level under new gate
	Stone drain (see detail)



Inspection Chamber No. 1



Construction Detail Adjacent to Carriageway N.T.S.

- NOTES**
- All dimensions are in millimetres unless otherwise stated.
 - Where dimension 'A' is in a taper section and varies from 0 to 750mm then concrete may be used in lieu of road base. Concrete to be C7.5 wet lean concrete to clause 1030 with 75mm slump placed with vibrating poker.
 - The edge of existing carriageway to be cut back 300mm to sound face or as directed by the Engineer.

TerraConsult

Bold Business Centre, Bold Lane, Sutton, St Helens WA9 4TX

Client
Augean PLC
the hazardous waste specialist

Site
Kingscliffe

Title
Entrance Widening

Scale	As Shown	@ A1
Drawing No.	1961/1/097	
Rev	Date	Description
File	19611097entrance.dwg	
Date	05/14	Engineer PS
Drawn	SK	Checked DRAFT

Attachment 2

Maximum Trip Generation Calculations

Estimated traffic movements associated with the ENRMF western extension

Green text is for the assumptions made for the 2012 traffic assessment. Purple text is new capacity/activities for inclusion in the 2021 application.

Calculated on a working week of 5.5days and a working year of 285 days.

Working week of 5.5 days and a working year of 279 days [365-78(Sun & 0.5 Sat) – 8 (Bank hols)].

Operation		Proposed tonnage of material	HGV generation (inbound and outbound)	
WASTE IMPORTATION AND EXPORTATION				
Landfill and waste treatment facility – overall waste input rate		250,000tpa 300,000tpa	30,488/annum 599/week 109/day	28,571/annum 563/week 102/day
Waste treatment facility exportation (50%) of throughput		50% of 150,000tpa = 75,000tpa 50% of 250,000tpa = 125,000tpa	7,500/annum 147/week 27/day	13,158/annum 259/week 47/day
Phase 6		278,000 tonnes over 21 months (84 weeks)	60 per day 330 per week	
Phase 7		179,000 tonnes over 19 months (76 weeks)	44 per day 242 per week	
Phase 8		93,000 tonnes over 22 months (88 weeks)	20 per day 110 per week	
Phase 9		64,000 tonnes over 17 months (68 weeks)	18 per day 100 per week	
Phase 10		70,000 tonnes over 16 months (64 weeks)	20 per day 110 per week	
Phase 11		47,000 tonnes over 21 months (84 weeks)	12 per day 66 per week	
Western extension phasing		Average of 219,281t per phase over 12 months.	23,082 over 12 months 455/week 83/day	
Maximum assumed 2012 assessment	Maximum in 2021 assessment		1,076/week 196/day	1,227/week 232/day

Appendix C
Northamptonshire Scoping Response March 2021

Dean Smy

From: Martin >
Sent: 30 March 2021 11:33
To: Dean Smy
Cc: Stuart Lilley; Will Buckley Renz; Phil Watson
Subject: RE: ENRMF Scoping

Good morning Dean,

Further to the Scoping note received I have the following comments in relation to the above scheme for your consideration:

- Given the anticipated minimal increased number of peak hour trips the LHA would confirm that further junction capacity assessments will not be required.
- The proposals do rely on the delivery of the site access improvements in accordance with drawing 1961/1/097 and these elements should be suitably secured through the DCO process.
- Due to the permanent onsite staff numbers remaining the same we could not sustain an objection based on a lack of sustainable connectivity, but acknowledging the site is poorly connected for non- motorised users.

I trust this clarifies our position

Kind regards

Martin

r

Northamptonshire Highways

One Angel Square
Angel Street
Northampton
NN1 1ED

From: Dean Smy <>
Sent: 22 March 2021 11:09
To: Phil <@northamptonshire.gov.uk>
Cc: Development Control <DevelopmentControl@northamptonshire.gov.uk>
Subject: ENRMF Scoping

Good Morning Phil,

I recently contacted Stuart Lilley and Chris Bond (8th March) to seek pre-application highways advice in relation to the proposed western extension of the ENRMF. See email attached which includes the scoping note. This follows and is in response to the scoping advice received in 2020. I hadn't heard back so forwarded the email to Mark Chant who was also involved in the project.

I would be grateful if you could advise who would be leading on this from highways and if possible to provide their telephone number so I can call to confirm that they have the note and to discuss timescales.

Kind regards

Dean

Dean Smy
Associate

Cannon Consulting Engineers | Cambridge House | Lanwades Business Park | Kentford | Newmarket | CB8 7PN

| www.CannonCE.co.uk



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Appendix D
Highways England Scoping Response March 2021

Dean Smy

From: Seldon, Martin
Sent: 30 March 2021 12:39
To: Dean Smy
Subject: RE: ZB791 - ENRMF Kings Cliffe Highways Scoping

Hi Dean

Thank you for your email on 17 March 2021 containing additional information regarding the proposed western extension of the ENRMF, Kings Cliffe.

Based on our review of the scoping note dated 17 March 2021, we note that the proposed development comprises of the following:

- Increase to the waste importation rate limit of the existing waste treatment facility and landfill from 250,000 tpa to 300,000 tpa
- Increase to the waste throughput of the existing waste treatment facility from 200,000 tpa to 250,000 tpa

We note that you anticipate the proposed extension to result in an additional movement of 36 two-way HGV trips per day and consider this to be acceptable. Considering the operational hours of the proposed development (07:00 to 17:30 hours), this would equate to circa 4 HGV movements per hour. As the likely traffic impact from the proposed development on the SRN in the area is minimal, we do not require you to undertake further traffic assessments.

We note that you will submit a Transport Statement/ Assessment in support of the forthcoming planning application and we welcome this.

Please note that the above comments are those of Highways England only and comments should also be sought from the Local Highway Authority.

Kind regards

Martin Seldon, Assistant Spatial Planner

Highways England | The Cube | 199 Wharfside Street | Birmingham | B1 1RN

From: Dean Smy
Sent: 17 March 2021 09:11
To: Seldon, Martin
Subject: FW: ZB791 - ENRMF Kings Cliffe Highways Scoping

Martin,

I understand that you discussed the provided a response to the scoping opinion for the proposed western extension of the ENRMF King Cliffe in July 2020, copy attached. Since then Cannon Consulting Engineers have been appointed to support a DCO application. We have reviewed comments raised by Northamptonshire County Council and by Highways England as part of the pre-application discussions and have prepared a scoping note setting out the proposed assessment considerations. I think the key point in the scoping note in relation to HE's network is the trip generation / distribution where there is estimated to be a maximum increase of 39 two-way movements per day or 4 two way movements in the peak hours.

In preparing the scoping note we have reviewed the HGV logs for the site for 2019 and have presented key statistics, which includes average and peak hour weekday movements. What this shows is that there is variation in the HGV movements and we would expect the additional HGV movements would arrive on days where HGV movements are lower (closer to the average) and not on the days where the maximum number of trips were recorded. However it is not considered that the 4 additional HGV movements will result in a material impact on the immediate highway network and once distributed onto the wider highway network the trips will have no impact and it is therefore not proposed to undertake capacity assessments of any offsite highway junctions, including those with the A1.

We would be grateful if you could review the scoping note to agree the content of the Transport Statement / Assessment.

If you have any queries or think it would be beneficial to discuss please contact us.

Kind regards

Dean

Dean Smy
Associate

Cannon Consulting Engineers | Cambridge House | Lanwades Business Park | Kentford | Newmarket | CB8 7PN



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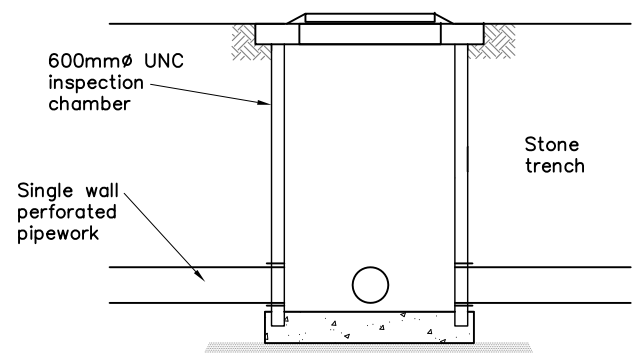
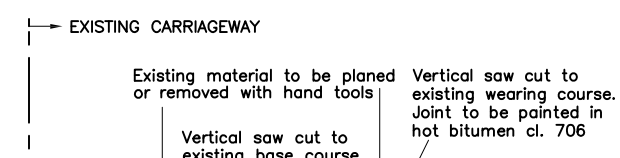
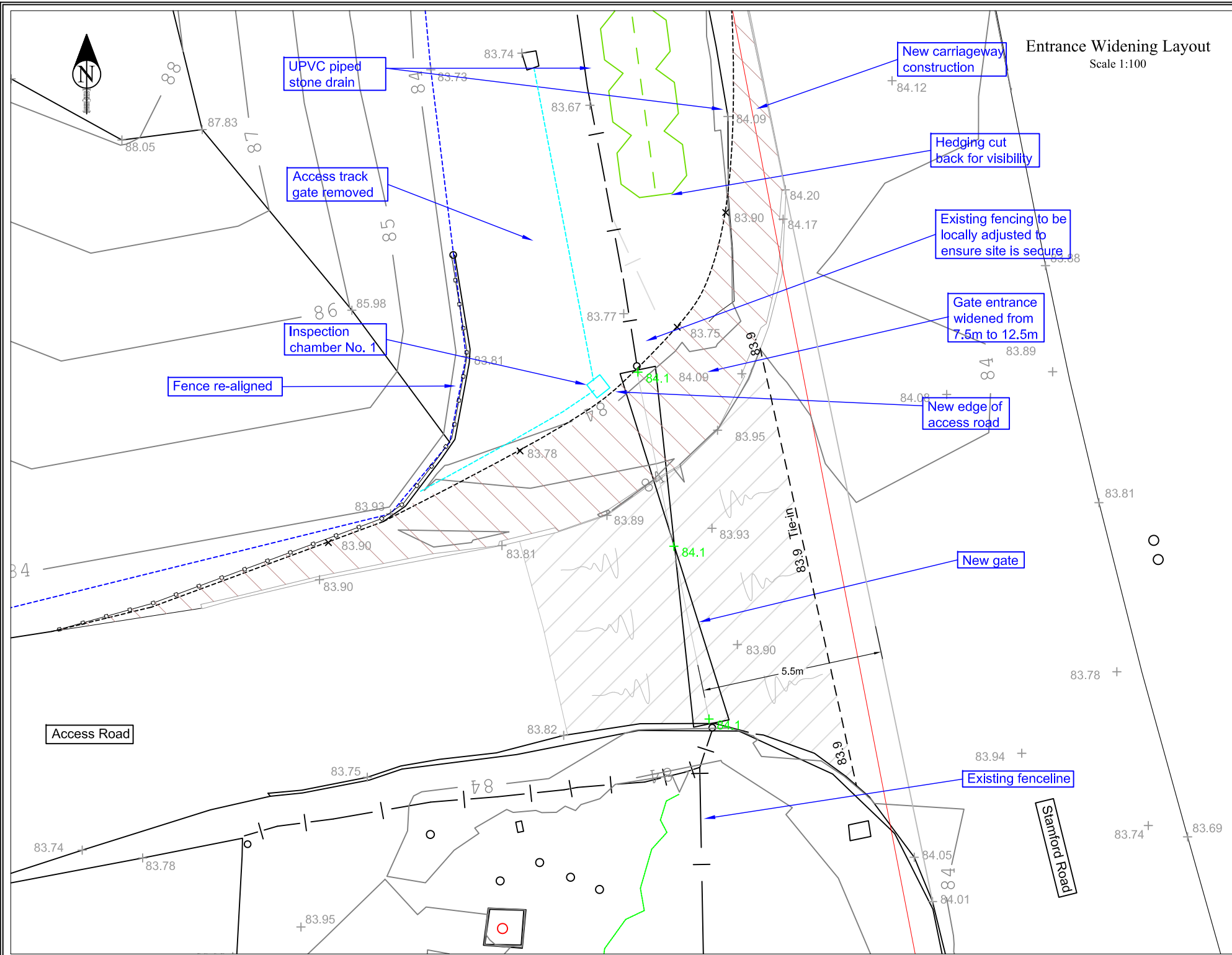
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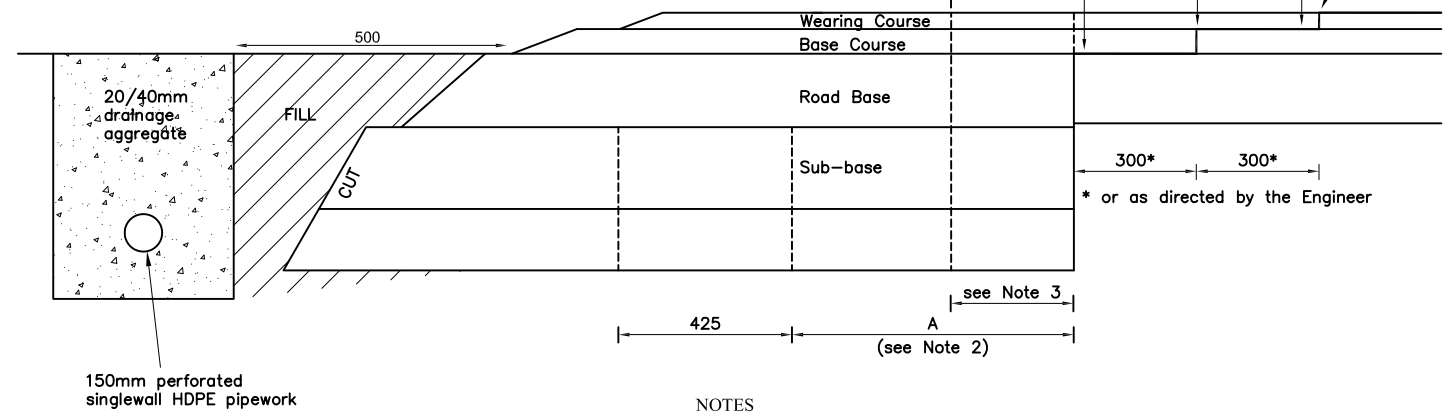
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Appendix E
Committed Site Access Drawing (1961/1/097)



Inspection Chamber No. 1



Construction Detail Adjacent to Carriageway N.T.S.

- NOTES
- All dimensions are in millimetres unless otherwise stated.
 - Where dimension 'A' is in a taper section and varies from 0 to 750mm then concrete may be used in lieu of road base. Concrete to be C7.5 wet lean concrete to clause 1030 with 75mm slump placed with vibrating poker.
 - The edge of existing carriageway to be cut back 300mm to sound face or as directed by the Engineer.

Key

	Surfacing to be removed / replaced / added to
	New road widening surfacing
	Level under new gate
	Stone drain (see detail)

TerraConsult

Bold Business Centre, Bold Lane,
Sutton, St Helens WA9 4TX

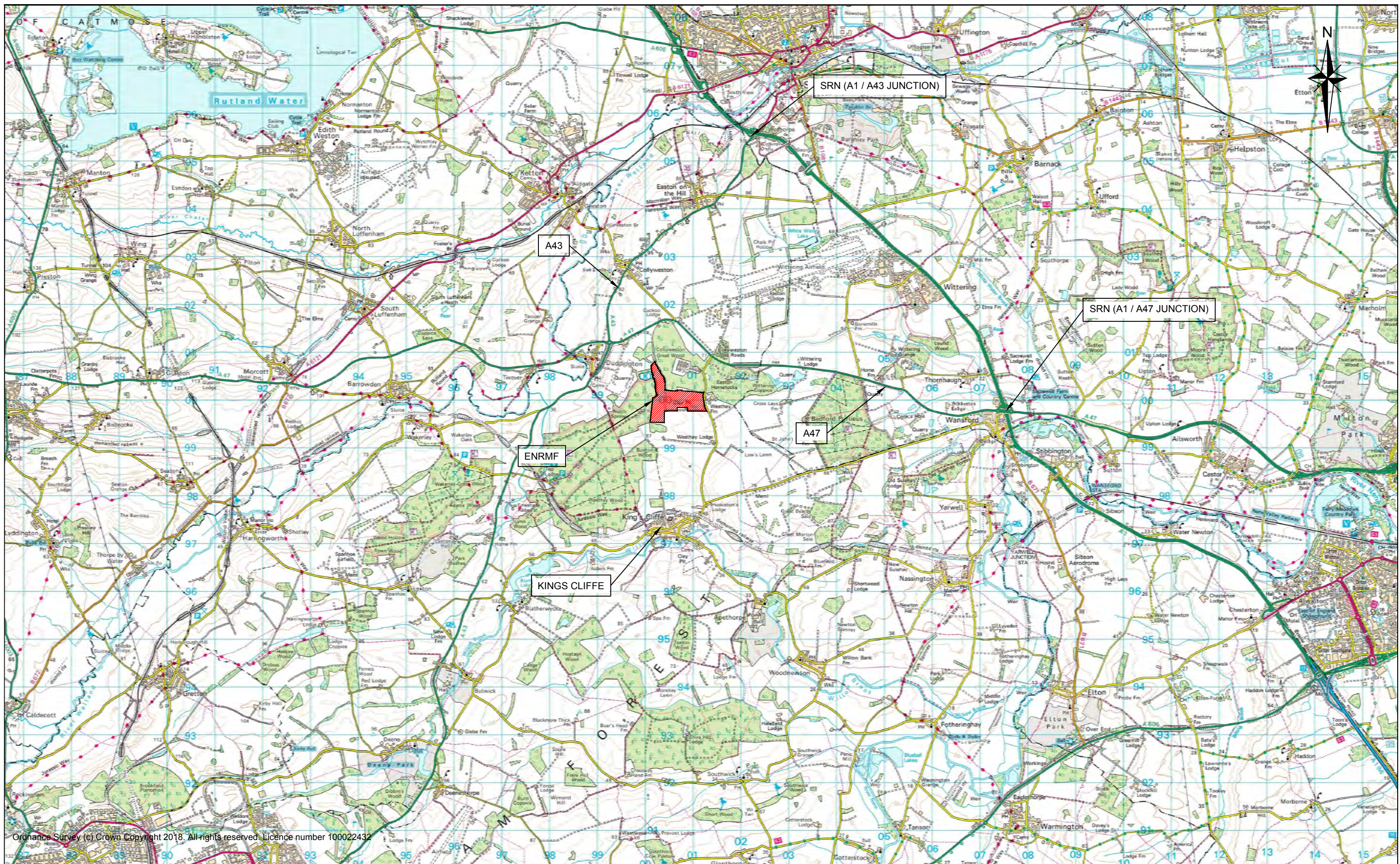
Client
 Augean PLC
the hazardous waste specialist

Site
Kingscliffe


Title
Entrance Widening

Scale	As Shown	@ A1
Drawing No.	1961/1/097	
Rev	Date	Description
File	19611097entrance.dwg	
Date	05/14	Engineer PS
Drawn	SK	Checked DRAFT

Appendix F
Wider Highway Network Plan



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PROJECT TITLE		CLIENT		DATE				Cannon Consulting Engineers Cambridge House, Kentford, Newmarket, Cambs, CB8 7PN Tel: +44 (0)1638 555 107 info@cannonce.co.uk www.cannonce.co.uk	
ENRMF - WESTERN EXTENSION		AUGEAN SOUTH LTD		19/07/21				DRAWING NUMBER	
DRAWING TITLE		DESIGNED	DRAWN	CHECKED	PASSED	SCALE @ A3	ISSUE STATUS	ZC791-PL-SK-201 -	
LOCATION PLAN (WIDER NETWORK)		DS	DS	DS	-	NTS	PRELIMINARY		
REV	DESCRIPTION	CH	PA	DATE					

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Appendix G
Existing Vehicle Logs

EXISTING HGV LOGS 2019 and 2020

Date	IN	OUT	Day Type	Day	IN	OUT	Time	Two way HGV
01/01/2019	2	2	3	Tuesday	2	2	01/01/2019	4
02/01/2019	36	36	4	Wednesday	36	36	02/01/2019	72
03/01/2019	37	37	5	Thursday	37	37	03/01/2019	74
04/01/2019	40	40	6	Friday	40	40	04/01/2019	80
05/01/2019	9	9	7	Saturday			05/01/2019	0
07/01/2019	38	38	2	Monday	38	38	07/01/2019	76
08/01/2019	71	71	3	Tuesday	71	71	08/01/2019	142
09/01/2019	57	57	4	Wednesday	57	57	09/01/2019	114
10/01/2019	80	80	5	Thursday	80	80	10/01/2019	160
11/01/2019	54	54	6	Friday	54	54	11/01/2019	108
12/01/2019	8	8	7	Saturday			12/01/2019	0
14/01/2019	49	49	2	Monday	49	49	14/01/2019	98
15/01/2019	55	55	3	Tuesday	55	55	15/01/2019	110
16/01/2019	49	49	4	Wednesday	49	49	16/01/2019	98
17/01/2019	58	58	5	Thursday	58	58	17/01/2019	116
18/01/2019	55	55	6	Friday	55	55	18/01/2019	110
19/01/2019	6	6	7	Saturday			19/01/2019	0
21/01/2019	48	48	2	Monday	48	48	21/01/2019	96
22/01/2019	55	55	3	Tuesday	55	55	22/01/2019	110
23/01/2019	49	49	4	Wednesday	49	49	23/01/2019	98
24/01/2019	42	42	5	Thursday	42	42	24/01/2019	84
25/01/2019	49	49	6	Friday	49	49	25/01/2019	98
26/01/2019	7	7	7	Saturday			26/01/2019	0
28/01/2019	48	48	2	Monday	48	48	28/01/2019	96
29/01/2019	58	58	3	Tuesday	58	58	29/01/2019	116
30/01/2019	59	59	4	Wednesday	59	59	30/01/2019	118
31/01/2019	47	47	5	Thursday	47	47	31/01/2019	94
01/02/2019	36	36	6	Friday	36	36	01/02/2019	72
02/02/2019	9	9	7	Saturday			02/02/2019	0
04/02/2019	51	51	2	Monday	51	51	04/02/2019	102
05/02/2019	46	46	3	Tuesday	46	46	05/02/2019	92
06/02/2019	47	47	4	Wednesday	47	47	06/02/2019	94
07/02/2019	44	44	5	Thursday	44	44	07/02/2019	88
08/02/2019	33	33	6	Friday	33	33	08/02/2019	66
09/02/2019	7	7	7	Saturday			09/02/2019	0
11/02/2019	50	50	2	Monday	50	50	11/02/2019	100
12/02/2019	52	52	3	Tuesday	52	52	12/02/2019	104
13/02/2019	59	59	4	Wednesday	59	59	13/02/2019	118
14/02/2019	55	55	5	Thursday	55	55	14/02/2019	110
15/02/2019	77	77	6	Friday	77	77	15/02/2019	154
16/02/2019	11	11	7	Saturday			16/02/2019	0
18/02/2019	66	66	2	Monday	66	66	18/02/2019	132
19/02/2019	60	60	3	Tuesday	60	60	19/02/2019	120
20/02/2019	54	54	4	Wednesday	54	54	20/02/2019	108
21/02/2019	53	53	5	Thursday	53	53	21/02/2019	106
22/02/2019	49	49	6	Friday	49	49	22/02/2019	98
23/02/2019	3	3	7	Saturday			23/02/2019	0
25/02/2019	76	76	2	Monday	76	76	25/02/2019	152
26/02/2019	95	95	3	Tuesday	95	95	26/02/2019	190
27/02/2019	79	79	4	Wednesday	79	79	27/02/2019	158
28/02/2019	51	51	5	Thursday	51	51	28/02/2019	102
01/03/2019	49	49	6	Friday	49	49	01/03/2019	98
02/03/2019	6	6	7	Saturday			02/03/2019	0
04/03/2019	54	54	2	Monday	54	54	04/03/2019	108
05/03/2019	63	63	3	Tuesday	63	63	05/03/2019	126
06/03/2019	46	46	4	Wednesday	46	46	06/03/2019	92
07/03/2019	71	71	5	Thursday	71	71	07/03/2019	142
08/03/2019	64	64	6	Friday	64	64	08/03/2019	128
09/03/2019	4	4	7	Saturday			09/03/2019	0

10/03/2019	1	1	1	Sunday			10/03/2019	0
11/03/2019	53	53	2	Monday	53	53	11/03/2019	106
12/03/2019	49	49	3	Tuesday	49	49	12/03/2019	98
13/03/2019	40	40	4	Wednesday	40	40	13/03/2019	80
14/03/2019	49	49	5	Thursday	49	49	14/03/2019	98
15/03/2019	66	66	6	Friday	66	66	15/03/2019	132
16/03/2019	6	6	7	Saturday			16/03/2019	0
18/03/2019	69	69	2	Monday	69	69	18/03/2019	138
19/03/2019	65	65	3	Tuesday	65	65	19/03/2019	130
20/03/2019	80	80	4	Wednesday	80	80	20/03/2019	160
21/03/2019	78	78	5	Thursday	78	78	21/03/2019	156
22/03/2019	59	59	6	Friday	59	59	22/03/2019	118
23/03/2019	6	6	7	Saturday			23/03/2019	0
25/03/2019	76	76	2	Monday	76	76	25/03/2019	152
26/03/2019	76	76	3	Tuesday	76	76	26/03/2019	152
27/03/2019	60	60	4	Wednesday	60	60	27/03/2019	120
28/03/2019	54	54	5	Thursday	54	54	28/03/2019	108
29/03/2019	47	47	6	Friday	47	47	29/03/2019	94
30/03/2019	6	6	7	Saturday			30/03/2019	0
01/04/2019	65	65	2	Monday	65	65	01/04/2019	130
02/04/2019	57	57	3	Tuesday	57	57	02/04/2019	114
03/04/2019	79	79	4	Wednesday	79	79	03/04/2019	158
04/04/2019	81	81	5	Thursday	81	81	04/04/2019	162
05/04/2019	62	62	6	Friday	62	62	05/04/2019	124
06/04/2019	8	8	7	Saturday			06/04/2019	0
08/04/2019	85	85	2	Monday	85	85	08/04/2019	170
09/04/2019	81	81	3	Tuesday	81	81	09/04/2019	162
10/04/2019	62	62	4	Wednesday	62	62	10/04/2019	124
11/04/2019	53	53	5	Thursday	53	53	11/04/2019	106
12/04/2019	51	51	6	Friday	51	51	12/04/2019	102
13/04/2019	16	16	7	Saturday			13/04/2019	0
15/04/2019	69	69	2	Monday	69	69	15/04/2019	138
16/04/2019	65	65	3	Tuesday	65	65	16/04/2019	130
17/04/2019	54	54	4	Wednesday	54	54	17/04/2019	108
18/04/2019	46	46	5	Thursday	46	46	18/04/2019	92
19/04/2019	24	24	6	Friday	24	24	19/04/2019	48
20/04/2019	1	1	7	Saturday			20/04/2019	0
22/04/2019	12	12	2	Monday	12	12	22/04/2019	24
23/04/2019	44	44	3	Tuesday	44	44	23/04/2019	88
24/04/2019	64	64	4	Wednesday	64	64	24/04/2019	128
25/04/2019	102	102	5	Thursday	102	102	25/04/2019	204
26/04/2019	65	65	6	Friday	65	65	26/04/2019	130
27/04/2019	13	13	7	Saturday			27/04/2019	0
29/04/2019	73	73	2	Monday	73	73	29/04/2019	146
30/04/2019	89	89	3	Tuesday	89	89	30/04/2019	178
01/05/2019	69	69	4	Wednesday	69	69	01/05/2019	138
02/05/2019	71	71	5	Thursday	71	71	02/05/2019	142
03/05/2019	71	71	6	Friday	71	71	03/05/2019	142
04/05/2019	10	10	7	Saturday			04/05/2019	0
06/05/2019	5	5	2	Monday	5	5	06/05/2019	10
07/05/2019	80	80	3	Tuesday	80	80	07/05/2019	160
08/05/2019	71	71	4	Wednesday	71	71	08/05/2019	142
09/05/2019	55	55	5	Thursday	55	55	09/05/2019	110
10/05/2019	44	44	6	Friday	44	44	10/05/2019	88
11/05/2019	6	6	7	Saturday			11/05/2019	0
13/05/2019	52	52	2	Monday	52	52	13/05/2019	104
14/05/2019	50	50	3	Tuesday	50	50	14/05/2019	100
15/05/2019	57	57	4	Wednesday	57	57	15/05/2019	114
16/05/2019	43	43	5	Thursday	43	43	16/05/2019	86
17/05/2019	50	50	6	Friday	50	50	17/05/2019	100
18/05/2019	6	6	7	Saturday			18/05/2019	0
20/05/2019	56	56	2	Monday	56	56	20/05/2019	112
21/05/2019	50	50	3	Tuesday	50	50	21/05/2019	100

22/05/2019	66	66	4	Wednesday	66	66	22/05/2019	132
23/05/2019	44	44	5	Thursday	44	44	23/05/2019	88
24/05/2019	50	50	6	Friday	50	50	24/05/2019	100
25/05/2019	5	5	7	Saturday			25/05/2019	0
27/05/2019	7	7	2	Monday	7	7	27/05/2019	14
28/05/2019	66	66	3	Tuesday	66	66	28/05/2019	132
29/05/2019	71	71	4	Wednesday	71	71	29/05/2019	142
30/05/2019	61	61	5	Thursday	61	61	30/05/2019	122
31/05/2019	47	47	6	Friday	47	47	31/05/2019	94
01/06/2019	16	16	7	Saturday			01/06/2019	0
03/06/2019	41	41	2	Monday	41	41	03/06/2019	82
04/06/2019	44	44	3	Tuesday	44	44	04/06/2019	88
05/06/2019	44	44	4	Wednesday	44	44	05/06/2019	88
06/06/2019	54	54	5	Thursday	54	54	06/06/2019	108
07/06/2019	50	50	6	Friday	50	50	07/06/2019	100
08/06/2019	3	3	7	Saturday			08/06/2019	0
10/06/2019	48	48	2	Monday	48	48	10/06/2019	96
11/06/2019	86	86	3	Tuesday	86	86	11/06/2019	172
12/06/2019	74	74	4	Wednesday	74	74	12/06/2019	148
13/06/2019	71	71	5	Thursday	71	71	13/06/2019	142
14/06/2019	71	71	6	Friday	71	71	14/06/2019	142
15/06/2019	4	4	7	Saturday			15/06/2019	0
17/06/2019	69	69	2	Monday	69	69	17/06/2019	138
18/06/2019	74	74	3	Tuesday	74	74	18/06/2019	148
19/06/2019	68	68	4	Wednesday	68	68	19/06/2019	136
20/06/2019	60	60	5	Thursday	60	60	20/06/2019	120
21/06/2019	50	50	6	Friday	50	50	21/06/2019	100
22/06/2019	8	8	7	Saturday			22/06/2019	0
24/06/2019	59	59	2	Monday	59	59	24/06/2019	118
25/06/2019	77	77	3	Tuesday	77	77	25/06/2019	154
26/06/2019	75	75	4	Wednesday	75	75	26/06/2019	150
27/06/2019	73	73	5	Thursday	73	73	27/06/2019	146
28/06/2019	54	54	6	Friday	54	54	28/06/2019	108
29/06/2019	7	7	7	Saturday			29/06/2019	0
01/07/2019	50	50	2	Monday	50	50	01/07/2019	100
02/07/2019	44	44	3	Tuesday	44	44	02/07/2019	88
03/07/2019	55	55	4	Wednesday	55	55	03/07/2019	110
04/07/2019	47	47	5	Thursday	47	47	04/07/2019	94
05/07/2019	43	43	6	Friday	43	43	05/07/2019	86
06/07/2019	6	6	7	Saturday			06/07/2019	0
08/07/2019	56	56	2	Monday	56	56	08/07/2019	112
09/07/2019	71	71	3	Tuesday	71	71	09/07/2019	142
10/07/2019	68	68	4	Wednesday	68	68	10/07/2019	136
11/07/2019	59	59	5	Thursday	59	59	11/07/2019	118
12/07/2019	53	53	6	Friday	53	53	12/07/2019	106
13/07/2019	9	9	7	Saturday			13/07/2019	0
15/07/2019	50	50	2	Monday	50	50	15/07/2019	100
16/07/2019	49	49	3	Tuesday	49	49	16/07/2019	98
17/07/2019	57	57	4	Wednesday	57	57	17/07/2019	114
18/07/2019	44	44	5	Thursday	44	44	18/07/2019	88
19/07/2019	58	58	6	Friday	58	58	19/07/2019	116
20/07/2019	5	5	7	Saturday			20/07/2019	0
22/07/2019	57	57	2	Monday	57	57	22/07/2019	114
23/07/2019	47	47	3	Tuesday	47	47	23/07/2019	94
24/07/2019	52	52	4	Wednesday	52	52	24/07/2019	104
25/07/2019	53	53	5	Thursday	53	53	25/07/2019	106
26/07/2019	55	55	6	Friday	55	55	26/07/2019	110
27/07/2019	11	11	7	Saturday			27/07/2019	0
29/07/2019	40	40	2	Monday	40	40	29/07/2019	80
30/07/2019	41	41	3	Tuesday	41	41	30/07/2019	82
31/07/2019	58	58	4	Wednesday	58	58	31/07/2019	116
01/08/2019	47	47	5	Thursday	47	47	01/08/2019	94
02/08/2019	35	35	6	Friday	35	35	02/08/2019	70

03/08/2019	14	14	7	Saturday			03/08/2019	0
05/08/2019	44	44	2	Monday	44	44	05/08/2019	88
06/08/2019	56	56	3	Tuesday	56	56	06/08/2019	112
07/08/2019	55	55	4	Wednesday	55	55	07/08/2019	110
08/08/2019	55	55	5	Thursday	55	55	08/08/2019	110
09/08/2019	55	55	6	Friday	55	55	09/08/2019	110
10/08/2019	8	8	7	Saturday			10/08/2019	0
12/08/2019	56	56	2	Monday	56	56	12/08/2019	112
13/08/2019	68	68	3	Tuesday	68	68	13/08/2019	136
14/08/2019	70	70	4	Wednesday	70	70	14/08/2019	140
15/08/2019	76	76	5	Thursday	76	76	15/08/2019	152
16/08/2019	67	67	6	Friday	67	67	16/08/2019	134
17/08/2019	9	9	7	Saturday			17/08/2019	0
19/08/2019	95	95	2	Monday	95	95	19/08/2019	190
20/08/2019	73	73	3	Tuesday	73	73	20/08/2019	146
21/08/2019	58	58	4	Wednesday	58	58	21/08/2019	116
22/08/2019	65	65	5	Thursday	65	65	22/08/2019	130
23/08/2019	63	63	6	Friday	63	63	23/08/2019	126
24/08/2019	12	12	7	Saturday			24/08/2019	0
26/08/2019	6	6	2	Monday	6	6	26/08/2019	12
27/08/2019	55	55	3	Tuesday	55	55	27/08/2019	110
28/08/2019	67	67	4	Wednesday	67	67	28/08/2019	134
29/08/2019	73	73	5	Thursday	73	73	29/08/2019	146
30/08/2019	66	66	6	Friday	66	66	30/08/2019	132
31/08/2019	15	15	7	Saturday			31/08/2019	0
02/09/2019	82	82	2	Monday	82	82	02/09/2019	164
03/09/2019	75	75	3	Tuesday	75	75	03/09/2019	150
04/09/2019	74	74	4	Wednesday	74	74	04/09/2019	148
05/09/2019	68	68	5	Thursday	68	68	05/09/2019	136
06/09/2019	72	72	6	Friday	72	72	06/09/2019	144
07/09/2019	13	13	7	Saturday			07/09/2019	0
09/09/2019	60	60	2	Monday	60	60	09/09/2019	120
10/09/2019	65	65	3	Tuesday	65	65	10/09/2019	130
11/09/2019	65	65	4	Wednesday	65	65	11/09/2019	130
12/09/2019	59	59	5	Thursday	59	59	12/09/2019	118
13/09/2019	54	54	6	Friday	54	54	13/09/2019	108
14/09/2019	5	5	7	Saturday			14/09/2019	0
16/09/2019	42	42	2	Monday	42	42	16/09/2019	84
17/09/2019	54	54	3	Tuesday	54	54	17/09/2019	108
18/09/2019	59	59	4	Wednesday	59	59	18/09/2019	118
19/09/2019	53	53	5	Thursday	53	53	19/09/2019	106
20/09/2019	36	36	6	Friday	36	36	20/09/2019	72
21/09/2019	9	9	7	Saturday			21/09/2019	0
23/09/2019	71	71	2	Monday	71	71	23/09/2019	142
24/09/2019	67	67	3	Tuesday	67	67	24/09/2019	134
25/09/2019	54	54	4	Wednesday	54	54	25/09/2019	108
26/09/2019	40	40	5	Thursday	40	40	26/09/2019	80
27/09/2019	39	39	6	Friday	39	39	27/09/2019	78
28/09/2019	11	11	7	Saturday			28/09/2019	0
30/09/2019	72	72	2	Monday	72	72	30/09/2019	144
01/10/2019	82	82	3	Tuesday	82	82	01/10/2019	164
02/10/2019	78	78	4	Wednesday	78	78	02/10/2019	156
03/10/2019	96	96	5	Thursday	96	96	03/10/2019	192
04/10/2019	73	73	6	Friday	73	73	04/10/2019	146
05/10/2019	4	4	7	Saturday			05/10/2019	0
07/10/2019	95	95	2	Monday	95	95	07/10/2019	190
08/10/2019	87	87	3	Tuesday	87	87	08/10/2019	174
09/10/2019	90	90	4	Wednesday	90	90	09/10/2019	180
10/10/2019	69	69	5	Thursday	69	69	10/10/2019	138
11/10/2019	75	75	6	Friday	75	75	11/10/2019	150
12/10/2019	13	13	7	Saturday			12/10/2019	0
14/10/2019	64	64	2	Monday	64	64	14/10/2019	128
15/10/2019	79	79	3	Tuesday	79	79	15/10/2019	158

16/10/2019	79	79	4	Wednesday	79	79	16/10/2019	158
17/10/2019	65	65	5	Thursday	65	65	17/10/2019	130
18/10/2019	66	66	6	Friday	66	66	18/10/2019	132
19/10/2019	6	6	7	Saturday			19/10/2019	0
21/10/2019	71	71	2	Monday	71	71	21/10/2019	142
22/10/2019	80	80	3	Tuesday	80	80	22/10/2019	160
23/10/2019	77	77	4	Wednesday	77	77	23/10/2019	154
24/10/2019	100	100	5	Thursday	100	100	24/10/2019	200
25/10/2019	85	85	6	Friday	85	85	25/10/2019	170
26/10/2019	5	5	7	Saturday			26/10/2019	0
28/10/2019	88	88	2	Monday	88	88	28/10/2019	176
29/10/2019	98	98	3	Tuesday	98	98	29/10/2019	196
30/10/2019	97	97	4	Wednesday	97	97	30/10/2019	194
31/10/2019	90	90	5	Thursday	90	90	31/10/2019	180
01/11/2019	95	95	6	Friday	95	95	01/11/2019	190
02/11/2019	10	10	7	Saturday			02/11/2019	0
04/11/2019	81	81	2	Monday	81	81	04/11/2019	162
05/11/2019	82	82	3	Tuesday	82	82	05/11/2019	164
06/11/2019	68	68	4	Wednesday	68	68	06/11/2019	136
07/11/2019	75	75	5	Thursday	75	75	07/11/2019	150
08/11/2019	76	76	6	Friday	76	76	08/11/2019	152
09/11/2019	10	10	7	Saturday			09/11/2019	0
11/11/2019	107	107	2	Monday	107	107	11/11/2019	214
12/11/2019	78	78	3	Tuesday	78	78	12/11/2019	156
13/11/2019	79	79	4	Wednesday	79	79	13/11/2019	158
14/11/2019	62	62	5	Thursday	62	62	14/11/2019	124
15/11/2019	72	72	6	Friday	72	72	15/11/2019	144
16/11/2019	10	10	7	Saturday			16/11/2019	0
18/11/2019	64	64	2	Monday	64	64	18/11/2019	128
19/11/2019	75	75	3	Tuesday	75	75	19/11/2019	150
20/11/2019	84	84	4	Wednesday	84	84	20/11/2019	168
21/11/2019	76	76	5	Thursday	76	76	21/11/2019	152
22/11/2019	70	70	6	Friday	70	70	22/11/2019	140
23/11/2019	9	9	7	Saturday			23/11/2019	0
25/11/2019	64	64	2	Monday	64	64	25/11/2019	128
26/11/2019	70	70	3	Tuesday	70	70	26/11/2019	140
27/11/2019	78	78	4	Wednesday	78	78	27/11/2019	156
28/11/2019	66	66	5	Thursday	66	66	28/11/2019	132
29/11/2019	58	58	6	Friday	58	58	29/11/2019	116
30/11/2019	7	7	7	Saturday			30/11/2019	0
02/12/2019	83	83	2	Monday	83	83	02/12/2019	166
03/12/2019	90	90	3	Tuesday	90	90	03/12/2019	180
04/12/2019	97	97	4	Wednesday	97	97	04/12/2019	194
05/12/2019	76	76	5	Thursday	76	76	05/12/2019	152
06/12/2019	68	68	6	Friday	68	68	06/12/2019	136
07/12/2019	8	8	7	Saturday			07/12/2019	0
09/12/2019	68	68	2	Monday	68	68	09/12/2019	136
10/12/2019	87	87	3	Tuesday	87	87	10/12/2019	174
11/12/2019	83	83	4	Wednesday	83	83	11/12/2019	166
12/12/2019	85	85	5	Thursday	85	85	12/12/2019	170
13/12/2019	60	60	6	Friday	60	60	13/12/2019	120
14/12/2019	14	14	7	Saturday			14/12/2019	0
16/12/2019	62	62	2	Monday	62	62	16/12/2019	124
17/12/2019	64	64	3	Tuesday	64	64	17/12/2019	128
18/12/2019	80	80	4	Wednesday	80	80	18/12/2019	160
19/12/2019	97	97	5	Thursday	97	97	19/12/2019	194
20/12/2019	76	76	6	Friday	76	76	20/12/2019	152
21/12/2019	11	11	7	Saturday			21/12/2019	0
23/12/2019	50	50	2	Monday	50	50	23/12/2019	100
24/12/2019	35	35	3	Tuesday	35	35	24/12/2019	70
26/12/2019	4	4	5	Thursday	4	4	26/12/2019	8
27/12/2019	23	23	6	Friday	23	23	27/12/2019	46
28/12/2019	15	15	7	Saturday			28/12/2019	0

30/12/2019	29	29	2	Monday	29	29	30/12/2019	58
31/12/2019	23	23	3	Tuesday	23	23	31/12/2019	46
Total	16416	16416	32832		15975	15975	31950	
Average	52	52	104.8946		61	61	123	
Max	107	107	214		107	107	214	
No days	313	313			260	260	520	
	77	77	7	43774.9	79	79	158	
02/01/2020	27	27	5	Thursday	27	27		54
03/01/2020	39	39	6	Friday	39	39		78
04/01/2020	9	9	7	Saturday				0
06/01/2020	46	46	2	Monday	46	46		92
07/01/2020	44	44	3	Tuesday	44	44		88
08/01/2020	58	58	4	Wednesday	58	58		116
09/01/2020	55	55	5	Thursday	55	55		110
10/01/2020	55	55	6	Friday	55	55		110
11/01/2020	9	9	7	Saturday				0
13/01/2020	63	63	2	Monday	63	63		126
14/01/2020	75	75	3	Tuesday	75	75		150
15/01/2020	71	71	4	Wednesday	71	71		142
16/01/2020	60	60	5	Thursday	60	60		120
17/01/2020	59	59	6	Friday	59	59		118
18/01/2020	7	7	7	Saturday				0
20/01/2020	47	47	2	Monday	47	47		94
21/01/2020	50	50	3	Tuesday	50	50		100
22/01/2020	59	59	4	Wednesday	59	59		118
23/01/2020	43	43	5	Thursday	43	43		86
24/01/2020	51	51	6	Friday	51	51		102
25/01/2020	9	9	7	Saturday				0
27/01/2020	64	64	2	Monday	64	64		128
28/01/2020	76	76	3	Tuesday	76	76		152
29/01/2020	74	74	4	Wednesday	74	74		148
30/01/2020	53	53	5	Thursday	53	53		106
31/01/2020	56	56	6	Friday	56	56		112
01/02/2020	12	12	7	Saturday				0
03/02/2020	61	61	2	Monday	61	61		122
04/02/2020	69	69	3	Tuesday	69	69		138
05/02/2020	75	75	4	Wednesday	75	75		150
06/02/2020	76	76	5	Thursday	76	76		152
07/02/2020	71	71	6	Friday	71	71		142
08/02/2020	12	12	7	Saturday				0
10/02/2020	83	83	2	Monday	83	83		166
11/02/2020	76	76	3	Tuesday	76	76		152
12/02/2020	74	74	4	Wednesday	74	74		148
13/02/2020	90	90	5	Thursday	90	90		180
14/02/2020	66	66	6	Friday	66	66		132
15/02/2020	8	8	7	Saturday				0
17/02/2020	48	48	2	Monday	48	48		96
18/02/2020	53	53	3	Tuesday	53	53		106
19/02/2020	71	71	4	Wednesday	71	71		142
20/02/2020	61	61	5	Thursday	61	61		122
21/02/2020	65	65	6	Friday	65	65		130
22/02/2020	12	12	7	Saturday				0
24/02/2020	65	65	2	Monday	65	65		130
25/02/2020	73	73	3	Tuesday	73	73		146
26/02/2020	55	55	4	Wednesday	55	55		110
27/02/2020	60	60	5	Thursday	60	60		120
28/02/2020	55	55	6	Friday	55	55		110
29/02/2020	11	11	7	Saturday				0
02/03/2020	54	54		Monday	54	54		108
03/03/2020	48	48		Tuesday	48	48		96
04/03/2020	56	56		Wednesday	56	56		112
05/03/2020	28	28		Thursday	28	28		56
06/03/2020	65	65		Friday	65	65		130

07/03/2020	9	9	Saturday			0
09/03/2020	64	64	Monday	64	64	128
10/03/2020	57	57	Tuesday	57	57	114
11/03/2020	70	70	Wednesday	70	70	140
12/03/2020	57	57	Thursday	57	57	114
13/03/2020	62	62	Friday	62	62	124
14/03/2020	13	13	Saturday			0
16/03/2020	61	61	Monday	61	61	122
17/03/2020	60	60	Tuesday	60	60	120
18/03/2020	63	63	Wednesday	63	63	126
19/03/2020	47	47	Thursday	47	47	94
20/03/2020	46	46	Friday	46	46	92
21/03/2020	10	10	Saturday			0
23/03/2020	40	40	Monday	40	40	80
24/03/2020	56	56	Tuesday	56	56	112
25/03/2020	47	47	Wednesday	47	47	94
26/03/2020	48	48	Thursday	48	48	96
27/03/2020	36	36	Friday	36	36	72
28/03/2020	8	8	Saturday			0
30/03/2020	49	49	Monday	49	49	98
31/03/2020	39	39	Tuesday	39	39	78
01/04/2020	42	42	Wednesday	42	42	84
02/04/2020	28	28	Thursday	28	28	56
03/04/2020	37	37	Friday	37	37	74
04/04/2020	3	3	Saturday			0
06/04/2020	38	38	Monday	38	38	76
07/04/2020	33	33	Tuesday	33	33	66
08/04/2020	48	48	Wednesday	48	48	96
09/04/2020	35	35	Thursday	35	35	70
10/04/2020	11	11	Friday	11	11	22
13/04/2020	10	10	Monday	10	10	20
14/04/2020	33	33	Tuesday	33	33	66
15/04/2020	34	34	Wednesday	34	34	68
16/04/2020	36	36	Thursday	36	36	72
17/04/2020	31	31	Friday	31	31	62
18/04/2020	5	5	Saturday			0
20/04/2020	35	35	Monday	35	35	70
21/04/2020	47	47	Tuesday	47	47	94
22/04/2020	46	46	Wednesday	46	46	92
23/04/2020	43	43	Thursday	43	43	86
24/04/2020	43	43	Friday	43	43	86
25/04/2020	9	9	Saturday			0
27/04/2020	49	49	Monday	49	49	98
28/04/2020	46	46	Tuesday	46	46	92
29/04/2020	44	44	Wednesday	44	44	88
30/04/2020	46	46	Thursday	46	46	92
01/05/2020	48	48	Friday	48	48	96
02/05/2020	8	8	Saturday			0
04/05/2020	45	45	Monday	45	45	90
05/05/2020	60	60	Tuesday	60	60	120
06/05/2020	62	62	Wednesday	62	62	124
07/05/2020	82	82	Thursday	82	82	164
08/05/2020	15	15	Friday	15	15	30
09/05/2020	7	7	Saturday			0
11/05/2020	46	46	Monday	46	46	92
12/05/2020	53	53	Tuesday	53	53	106
13/05/2020	54	54	Wednesday	54	54	108
14/05/2020	49	49	Thursday	49	49	98
15/05/2020	43	43	Friday	43	43	86
16/05/2020	4	4	Saturday			0
18/05/2020	30	30	Monday	30	30	60
19/05/2020	49	49	Tuesday	49	49	98
20/05/2020	40	40	Wednesday	40	40	80

21/05/2020	34	34	Thursday	34	34	68
22/05/2020	43	43	Friday	43	43	86
23/05/2020	6	6	Saturday			0
25/05/2020	15	15	Monday	15	15	30
26/05/2020	40	40	Tuesday	40	40	80
27/05/2020	45	45	Wednesday	45	45	90
28/05/2020	36	36	Thursday	36	36	72
29/05/2020	26	26	Friday	26	26	52
30/05/2020	10	10	Saturday			0
01/06/2020	23	23	Monday	23	23	46
02/06/2020	42	42	Tuesday	42	42	84
03/06/2020	37	37	Wednesday	37	37	74
04/06/2020	47	47	Thursday	47	47	94
05/06/2020	48	48	Friday	48	48	96
06/06/2020	3	3	Saturday			0
08/06/2020	39	39	Monday	39	39	78
09/06/2020	38	38	Tuesday	38	38	76
10/06/2020	44	44	Wednesday	44	44	88
11/06/2020	35	35	Thursday	35	35	70
12/06/2020	44	44	Friday	44	44	88
13/06/2020	8	8	Saturday			0
15/06/2020	39	39	Monday	39	39	78
16/06/2020	38	38	Tuesday	38	38	76
17/06/2020	48	48	Wednesday	48	48	96
18/06/2020	46	46	Thursday	46	46	92
19/06/2020	38	38	Friday	38	38	76
20/06/2020	11	11	Saturday			0
22/06/2020	42	42	Monday	42	42	84
23/06/2020	46	46	Tuesday	46	46	92
24/06/2020	49	49	Wednesday	49	49	98
25/06/2020	34	34	Thursday	34	34	68
26/06/2020	42	42	Friday	42	42	84
27/06/2020	6	6	Saturday			0
29/06/2020	53	53	Monday	53	53	106
30/06/2020	57	57	Tuesday	57	57	114
01/07/2020	50	50	Wednesday	50	50	100
02/07/2020	33	33	Thursday	33	33	66
03/07/2020	45	45	Friday	45	45	90
04/07/2020	7	7	Saturday			0
06/07/2020	60	60	Monday	60	60	120
07/07/2020	55	55	Tuesday	55	55	110
08/07/2020	39	39	Wednesday	39	39	78
09/07/2020	41	41	Thursday	41	41	82
10/07/2020	52	52	Friday	52	52	104
11/07/2020	8	8	Saturday			0
13/07/2020	53	53	Monday	53	53	106
14/07/2020	51	51	Tuesday	51	51	102
15/07/2020	58	58	Wednesday	58	58	116
16/07/2020	47	47	Thursday	47	47	94
17/07/2020	43	43	Friday	43	43	86
18/07/2020	8	8	Saturday			0
20/07/2020	41	41	Monday	41	41	82
21/07/2020	53	53	Tuesday	53	53	106
22/07/2020	55	55	Wednesday	55	55	110
23/07/2020	56	56	Thursday	56	56	112
24/07/2020	53	53	Friday	53	53	106
25/07/2020	14	14	Saturday			0
27/07/2020	56	56	Monday	56	56	112
28/07/2020	44	44	Tuesday	44	44	88
29/07/2020	66	66	Wednesday	66	66	132
30/07/2020	57	57	Thursday	57	57	114
31/07/2020	52	52	Friday	52	52	104
01/08/2020	10	10	Saturday			0

03/08/2020	48	48	Monday	48	48	96
04/08/2020	58	58	Tuesday	58	58	116
05/08/2020	57	57	Wednesday	57	57	114
06/08/2020	51	51	Thursday	51	51	102
07/08/2020	46	46	Friday	46	46	92
08/08/2020	12	12	Saturday			0
10/08/2020	62	62	Monday	62	62	124
11/08/2020	70	70	Tuesday	70	70	140
12/08/2020	65	65	Wednesday	65	65	130
13/08/2020	63	63	Thursday	63	63	126
14/08/2020	51	51	Friday	51	51	102
15/08/2020	14	14	Saturday			0
17/08/2020	34	34	Monday	34	34	68
18/08/2020	72	72	Tuesday	72	72	144
19/08/2020	72	72	Wednesday	72	72	144
20/08/2020	52	52	Thursday	52	52	104
21/08/2020	52	52	Friday	52	52	104
22/08/2020	8	8	Saturday			0
24/08/2020	56	56	Monday	56	56	112
25/08/2020	59	59	Tuesday	59	59	118
26/08/2020	49	49	Wednesday	49	49	98
27/08/2020	62	62	Thursday	62	62	124
28/08/2020	44	44	Friday	44	44	88
29/08/2020	7	7	Saturday			0
31/08/2020	14	14	Monday	14	14	28
01/09/2020	54	54	Tuesday	54	54	108
02/09/2020	64	64	Wednesday	64	64	128
03/09/2020	59	59	Thursday	59	59	118
04/09/2020	50	50	Friday	50	50	100
05/09/2020	14	14	Saturday			0
07/09/2020	49	49	Monday	49	49	98
08/09/2020	40	40	Tuesday	40	40	80
09/09/2020	48	48	Wednesday	48	48	96
10/09/2020	66	66	Thursday	66	66	132
11/09/2020	55	55	Friday	55	55	110
12/09/2020	11	11	Saturday			0
14/09/2020	68	68	Monday	68	68	136
15/09/2020	67	67	Tuesday	67	67	134
16/09/2020	67	67	Wednesday	67	67	134
17/09/2020	60	60	Thursday	60	60	120
18/09/2020	42	42	Friday	42	42	84
19/09/2020	9	9	Saturday			0
21/09/2020	43	43	Monday	43	43	86
22/09/2020	49	49	Tuesday	49	49	98
23/09/2020	62	62	Wednesday	62	62	124
24/09/2020	51	51	Thursday	51	51	102
25/09/2020	47	47	Friday	47	47	94
26/09/2020	7	7	Saturday			0
28/09/2020	58	58	Monday	58	58	116
29/09/2020	67	67	Tuesday	67	67	134
30/09/2020	57	57	Wednesday	57	57	114
01/10/2020	60	60	Thursday	60	60	120
02/10/2020	54	54	Friday	54	54	108
03/10/2020	6	6	Saturday			0
05/10/2020	62	62	Monday	62	62	124
06/10/2020	58	58	Tuesday	58	58	116
07/10/2020	51	51	Wednesday	51	51	102
08/10/2020	52	52	Thursday	52	52	104
09/10/2020	41	41	Friday	41	41	82
10/10/2020	11	11	Saturday			0
12/10/2020	41	41	Monday	41	41	82
13/10/2020	61	61	Tuesday	61	61	122
14/10/2020	52	52	Wednesday	52	52	104

15/10/2020	47	47		Thursday	47	47	94
16/10/2020	41	41		Friday	41	41	82
17/10/2020	11	11		Saturday			0
19/10/2020	54	54		Monday	54	54	108
20/10/2020	61	61		Tuesday	61	61	122
21/10/2020	57	57		Wednesday	57	57	114
22/10/2020	50	50		Thursday	50	50	100
23/10/2020	47	47		Friday	47	47	94
24/10/2020	8	8		Saturday			0
26/10/2020	54	54		Monday	54	54	108
27/10/2020	69	69		Tuesday	69	69	138
28/10/2020	63	63		Wednesday	63	63	126
29/10/2020	62	62		Thursday	62	62	124
30/10/2020	52	52		Friday	52	52	104
31/10/2020	8	8		Saturday			0
02/11/2020	56	56		Monday	56	56	112
03/11/2020	55	55		Tuesday	55	55	110
04/11/2020	64	64		Wednesday	64	64	128
05/11/2020	55	55		Thursday	55	55	110
06/11/2020	59	59		Friday	59	59	118
07/11/2020	15	15		Saturday			0
09/11/2020	58	58		Monday	58	58	116
10/11/2020	66	66		Tuesday	66	66	132
11/11/2020	59	59		Wednesday	59	59	118
12/11/2020	71	71		Thursday	71	71	142
13/11/2020	61	61		Friday	61	61	122
14/11/2020	10	10		Saturday			0
16/11/2020	56	56		Monday	56	56	112
17/11/2020	66	66		Tuesday	66	66	132
18/11/2020	56	56		Wednesday	56	56	112
19/11/2020	59	59		Thursday	59	59	118
20/11/2020	58	58		Friday	58	58	116
21/11/2020	12	12		Saturday			0
22/11/2020	1	1		Sunday			0
23/11/2020	60	60		Monday	60	60	120
24/11/2020	57	57		Tuesday	57	57	114
25/11/2020	62	62		Wednesday	62	62	124
26/11/2020	61	61		Thursday	61	61	122
27/11/2020	52	52		Friday	52	52	104
28/11/2020	10	10		Saturday			0
30/11/2020	52	52		Monday	52	52	104
01/12/2020	59	59		Tuesday	59	59	118
02/12/2020	78	78		Wednesday	78	78	156
03/12/2020	64	64		Thursday	64	64	128
04/12/2020	57	57		Friday	57	57	114
05/12/2020	9	9		Saturday			0
07/12/2020	48	48		Monday	48	48	96
08/12/2020	54	54		Tuesday	54	54	108
09/12/2020	69	69		Wednesday	69	69	138
10/12/2020	58	58		Thursday	58	58	116
11/12/2020	59	59		Friday	59	59	118
12/12/2020	10	10		Saturday			0
14/12/2020	62	62		Monday	62	62	124
15/12/2020	58	58		Tuesday	58	58	116
16/12/2020	73	73		Wednesday	73	73	146
17/12/2020	76	76		Thursday	76	76	152
18/12/2020	65	65		Friday	65	65	130
19/12/2020	3	3		Saturday			0
21/12/2020	2	2		Monday	2	2	4
Total	13670	13670	27340		13218	13218	26436
Average	45	45	5		52	52	104
Max	90	90	7		90	90	180
No days	304	304	51		253	253	506

Appendix H
Fairhurst 2012 Response to Traffic Concerns

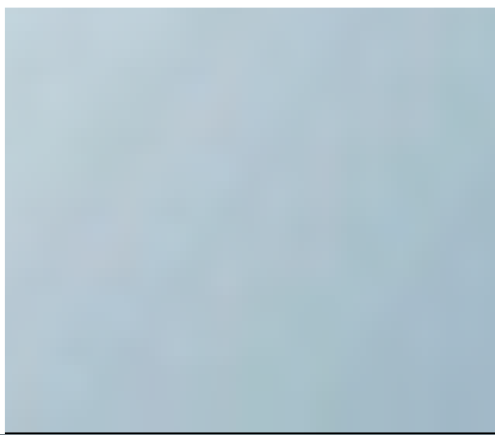
**East Northamptonshire Resource Management
Facility**

**Response to Objections to the Proposed Extension
of Operations at Kings Cliffe Landfill**

For

Augean PLC

Report 86466/011



CONTROL SHEET

CLIENT: Augean Plc

PROJECT TITLE: East Northamptonshire Resource Management Facility

REPORT TITLE: Response to Objection to Development Consent Order

PROJECT REFERENCE: 86466/011

Issue and Approval Schedule:

ISSUE 1 Final			
Prepared by	M Hayward	<i>M Hayward</i>	09/03/2012
Reviewed by	G Speller	<i>G Speller</i>	09/03/2012
Approved by	G Speller	<i>G Speller</i>	09/03/2012

Revision Record:

Issue	Date	Status	Description	By	Chk	App
2						
3						
4						
5						
6						

This report has been prepared in accordance with procedure OP/P02 of Fairhurst's Quality Management System

Fairhurst

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Appendices

Appendix A - Objection Letter

1.0 Introduction

- 1.1 Fairhurst have been commissioned by Augean Plc to respond to an objection to their current Development Consent Order application for the proposed extension of operations at their East Northamptonshire Resource Management Facility.
- 1.2 An objection to the scheme was received in the form of a report from a member of the public.

2.0 Background

- 2.1 Fairhurst, on behalf of Augean Plc, have produced a number of transport assessment documents which consider the implications of extended operations at this site. The documents have been produced in consultation with the local highway authority and conclude that there are no sustainable highway grounds for objecting to the current and proposed operations, subject to a number of agreed planning conditions.
- 2.2 In response to concerns about the effect mud on the road could have, particularly at the bend north of the site, Fairhurst produced a report in October 2009 titled "Assessment of Highway Conditions". This included the results of independent in-situ skid resistance tests on wet and un-swept portions of Stamford Road and a review of accident data.
- 2.3 The tests were undertaken in accordance with BS EN13036-4:2003 Road and Airfield Surface Characteristics Test Methods — Part 4: Method for Measurement of Slip/Skid Resistance of a Surface: - The Pendulum Test. These were compared against the skid resistance values given in the Road Research Laboratory Road Note 27. The tests showed that skid resistance was above the national recommended for the category of road based on the aforementioned documents.
- 2.4 A review of accident data for ten reported accidents near the bend between the A47 and the site between 01 January 1995 and 31st December 2008 showed only one incident in March 2007 during normal working hours of the facility and the stated cause was wet mud / travelling too fast.
- 2.5 The report concluded that "... Based on the above there is no evidence that in general the operations of the East Northants Resource Management Facility have an adverse effect on the safety of Stamford Road. Given the standard of the road surface and the wheel and road cleaning provisions in place it is highly unlikely that sufficient mud on the road will be trafficked to the bend that would significantly affect traction at this location."

3.0 Up Dated Traffic Accident Records

3.1 As the aforementioned reports were based on accident data up to 31st December 2008 (the most recent at the time), the most recent accident data covering the study area were obtained from Northamptonshire County Council which covered the period up to November 2011. This data indicates no further recorded accidents within the study area.

4.0 Review of Objections

4.1 An objection letter dated 14 February 2012 was received via Northamptonshire County Council on 21 February 2012 in response to the pending Development Consent Order application. The objections are split into four subject areas:-

- Highway Conditions
- Temporary Highway signage
- Road Debris
- Considerations for Improvements

4.2 There are a large number of points raised. The full letter is given in Appendix A and the main points raised are outlined below with a response.

Item No	Item Raised	Response
Highway Conditions		
1	Hedge on edge of the site and banking in the site cast a shadow over the road and can prevent the road drying out.	The site is in a rural location and hedges/trees are a feature of the landscape. Particularly in winter, sections of rural roads can be in shadow for most of the day. Drivers should take this into account.
2	Is the road gritted?	According to the Northants County Council web site Stamford Road is on a precautionary gritting route i.e. it is on a gritting route when it is deemed that there is a risk of ice / snow etc. The plan is in Figure 1. Augean also grit the Stamford Road during periods of cold weather using the gritter pulled behind a 4x4 truck.

3	The bend near the site is frequently covered in mud, has an adverse camber and is in shade.	There is no evidence that the bend is frequently mud covered. Surface staining with mud slurry from the sweeper is visible on occasions but this is no worse than the road being wet after rain. Independent tests have demonstrated that in absence of sweeping and in wet conditions, the carriageway maintains an acceptable level of skid resistance. It is considered that the road layout does not present a significant road safety issue. See also item 5.
4	The trees are a hazard to vehicles that leave the road.	This is the case for a majority of rural roads.
5	The bend near the A47 sometimes forces larger vehicles over the central line.	This does not appear to be a common occurrence and reflects a general driving situation on rural lanes which other road users should take into account. The road layout is likely to be modified as part of development proposals for the adjacent storage facility.
6	The bend is deceptive and catches drivers out.	This is not borne out by accident data provided by NCC.
7	There are tyre marks on the nearside kerb.	This is common on most bends with splayed kerbs on the inner radii.
8	In winter there is glare from the low sun whilst approaching the site from the A47.	This is a general hazard wherever you are driving, and drivers should adjust their speed to suit.
9	This part of road is often wet with mud slurry or water from the sweeper.	It is assumed that the slurry etc is the result of the sweeping – carriageway skid resistance is maintained to acceptable levels.
Temporary Highway Signage		
10	Temporary signs	The temporary signage has not been erected by Augean Plc or the road cleaning contractors employed by Augean
Road Debris		
11	Clay lump on road outside gate.	This is a rare occurrence and does not constitute a highway hazard and is dealt with promptly by the sweeper.
12	Debris on verge from trucks or displaced by sweeper.	This will be looked into and suitable remedial action taken if necessary. All drivers are

		responsible for the condition of their vehicles on the highway and are advised under site rules and induction of their responsibilities. Drivers who do not adhere to the site rules are banned. In the event stones fall from a lorry the sweeper pushes the stones to the side of the road where they do not represent a risk.
13	Mud apparently still on trucks after leaving the site.	A new wheel wash system is being installed in the near future which will increase the effectiveness of the washing system. This consists of a wheel spinner, wheel bath then two spray units. The hardstanding between the wheel wash and the public highway will be drained to reduce the instances of standing water.
14	Sweeper travelling slowly causing traffic delays and tricky / potentially dangerous overtaking manoeuvres. It takes 5 minutes to sweep from the site to the A47.	The operation of the sweeper results in short delays to traffic which is considered reasonable. Similar delays would be expected as a result of equestrian road users, cyclists and farm machinery.
15	Congestion at entrance to the site.	At times there may be instances where vehicles slow down or stop at the entrance to allow other vehicles to egress safely. It is not proposed to increase the number of vehicle movements and the operation of the access will remain unaffected by the development proposals. Accident data shows that the entrance is not a safety issue.
16	Traffic movements in relation to the P. C. Howard site	The operational procedures of the P. C. Howard site are not within Augean jurisdiction. Furthermore the number of total vehicle movements to the Augean facility are not being increased therefore traffic movements will not change from those already consented.
Consideration for Improvements		
17	Improvements to the current vehicle cleansing regime.	A new wheel wash is being installed in the near future as Item 13. Its performance will be monitored. And if it is felt additional checks e.g. by drivers should be made they will be implemented.
18	Illuminated sign when sweeper operational.	This is not considered appropriate and would not be consistent with highway signing and conditions on the wider highway network.

19	Freephone number	It is considered that this would not be safe or effective. The site encourages reporting of any concerns regarding its operations by phoning or e-mailing the site on 01780 444900 or simonmoyle@augeanplc.com
20	Alterations to current access	This is covered in Item 15

5.0 Conclusion

- 5.1 This report has investigated issues raised in a letter of objection to Augean Plc's Development Consent Order application for the proposed extension of operations at their East Northamptonshire Resource Management Facility.
- 5.2 Previous reports by Fairhurst have shown that the traffic impact of the proposed extension of operations will not adversely affect the operation of the highway network. Additionally skid resistance is above the national standards for the category of Stamford Road.
- 5.3 Road accident data has shown that of 10 accidents which have occurred between the facility and the A47 during operational hours since January 1995 only one mentioned mud on the road but this also cited excessive speed. Based on this it is considered that unsafe driving is the root cause of accidents and is not inconsistent with other rural road layouts.
- 5.4 It appears that on occasions slurry (from the sweeper cleansing) is confused for mud on the road. It is acknowledged that occasionally lumps of mud are deposited from vehicles but these are isolated incidents and quickly removed.
- 5.5 Most of the points raised are not hazards (e.g. wet road, trees, low sun etc) if vehicles are driven in due consideration for the prevailing conditions and for other road users. They are representative of highway conditions on the wider network.
- 5.6 Based on the above it is considered that no particular actions are required by Augean Plc to address the objection raised.

Figure 1

Precautionary Gritting Routes



Figure 1 - Precautionary Gritting Routes

— Indicates precautionary gritting route

Appendix A



Objection Letter

Objections to the Proposed Extension of Operations at Kings Cliffe Landfill

Traffic Concerns outside the Kings Cliffe Landfill

This document has been produced by a member of the Kings Cliffe community to highlight traffic safety issues outside the Kings Cliffe landfill. I am a regular user of the stretch of the Stamford Road which runs between the entrance to the landfill operated by Augean PLC and the entrance to the freight company P.C.Howard and the road's junction with the A47, approximately 0.5km away. This stretch of road receives a high proportion of heavy goods vehicles combined with local traffic primarily moving to and from the nearby Kings Cliffe community. It highlights a number of concerns relating to the road conditions, highway signage and potential road safety issues. These concerns were identified following a number of visits to the area and observations made from the kerbside, at different times of day and under varying weather conditions, during January and February 2012.

Highway Conditions

	
<p>During the winter months the presence of the hedgerow and the high banking in the landfill site cast shadows across the road preventing any chance of the road being dried by sunlight, or the melting of ice in winter. I'm unsure as to whether this road is gritted during periods of bad weather.</p>	<p>The "S" bends which are close to the landfill gates are frequently covered in mud and can be treacherous. They are also on a descent, have an adverse camber and are often in shade. The trees provide a safety hazard for any vehicles that leave the highway.</p>



The approach from the A47 includes this tight bend which forces large vehicles out wide into the path of approaching traffic. The bend is deceptive in terms of approach speed and has a late apex which catches drivers out; the nearside kerb carries evidence of numerous tyre scrapes.



In the winter months traffic approaching from the A47 can also have glare to contend with from the wet road surface, caused by the mud slurry or water left by the mechanical road sweeper.

Temporary Highway Signage



These are two of the “temporary” road signs that have been in use for some years, in both directions. Clearly they are not official highway signs. Augean denied they are responsible for them, and refused to tell me who placed them.



I assume these temporary signs are the responsibility of either the road cleaning contractors or possibly P.C.Howard. They remain in position even when the landfill site is closed.

Road Debris



This is just one example of a clump of clay outside the gates to Augean.



The nearside kerb heading towards the A47 is littered with large stones and pieces of brick and concrete which have either fallen from trucks or been swept aside by the mechanical road sweeper. I've come across similar items in the road on a number of occasions whilst driving past the gates.



This shows how effective the current wheel cleaning equipment is at Augean. This is fairly typical of the condition of trucks leaving the site. During my observations I didn't see a single driver inspect their truck before leaving to remove rocks. Augean do have CCTV in position already, but they don't appear to be using it to monitor the situation at the gates. The gates are apparently unmanned.



The mechanical road sweeper is deployed on very regular occasions when conditions demand, but is in regular use on both wet and dry days. It takes approximately 5 minutes to make the outbound journey; a long time when you're trying to get past it. It makes no concessions to traffic trying to pass. On its return journey it frequently positions itself over the white line, forcing oncoming traffic hard over to the kerb. The road conditions offer poor visibility, making passing tricky and potentially dangerous. Hard braking isn't possible safely due to the road surface conditions.



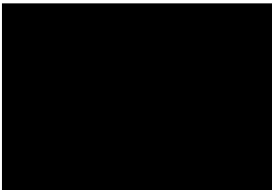
The entrance to the landfill is too narrow to allow trucks to pass, and hence they often obstruct each other causing backup onto the highway and at times obstructing oncoming traffic coming from Kings Cliffe direction. Trucks often arrive in pairs, sometimes more; worst case I've witnessed is six trucks in succession with all the accompanying obstruction at the gates and no doubt on their journey too.



There are also significant numbers of traffic movements in relation to the P.C.Howard freight company, whose entrance is positioned opposite the landfill; they contribute significantly to the levels of obstruction. The entrance approach is tight so they are forced to remain out wide on the highway in order to swing round into their yard.

Considerations for improvement:

- 1) Improvements to the current vehicle cleaning regime, to achieve more effective removal of mud and debris. Removal of residual water other than by gravity, possibly through the use of air cleaning blades. Positioning of the cleaning station as near to the gates as possible, with vehicles exiting over a grill for drainage, rather than a sealed surface. Compulsory inspection of vehicles before leaving site, either by drivers or manning of the gates. Monitoring of CCTV footage to identify problems. There doesn't appear to be any emphasis on the drivers to take responsibility and therefore Augean seem to be relying upon using the road sweeper rather than keeping the problems within their gates.
- 2) The use of illuminated warning signs to be active only when the road sweeper is in use, or when exceptionally adverse conditions apply.
- 3) The presence of a Freephone number for passing vehicles to report dangerous obstacles in the road, dirty vehicles or poor driving from contractors using the site.
- 4) Alterations to the current road layout to eliminate the high levels of obstruction caused by vehicles entering the landfill and also the freight company. Widening of the landfill entrance. Improving the route of the Stamford Road to flatten out bends and improve visibility where possible.



14th February 2012

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Appendix I
Complaints and Responses Record (2013 – present)

Traffic and Related Complaints record at ENRMF 2015 – June 2021

Year	Total number of complaints received	Comments
2015	0	
2016	0	
2017	0	
2018	1	Other – not related to traffic
2019	0	No complaint, recorded internally. There was a 'no reported injury' accident on Stamford Road on 31st October 2019 during operational hours. Driver lost control driving from the A47 to the south towards the site and collided with the wheelie bins left outside the row of cottages. No vehicles associated with ENRMF were involved. The Augean operational team went out to assist, provide traffic control, clear the debris and waste from the road. The police did not attend.
2020	7	1 (2020). Dust and Other (Traffic and flies) – complaint received on 16 August 2020. Complainant mentioned the level of dust and flies at Westhay Cottage in 2020 and the lack of spray suppression around the boundary of the site. The complainant also mentioned that lorries using the site are not washing their wheels upon exit and spreading even more dust along the road clogging the drainage systems and that lorries sometimes cause congestion on the road and block access to their house. Augean responded to the complainant on 19 August 2020 confirming that they were investigating the complaint and provided a full response to the complainant on 25 August 2020. The following points were explained to the complainant:

Year	Total number of complaints received	Comments
		<ul style="list-style-type: none"> • It has been more than years since a spray system has been in place along the eastern boundary of the site. Augean use a tractor and bowser to suppress dust along haul roads and active areas of the site and have a dust suppression system in place for the soil treatment facility at the western end of the site. • Fly infestations are usually experienced at sites which take a high level of organic material whereas ENRMF only accepts wastes with a low organic content. As the site offices and other ancillary buildings on site are fly free it is extremely unlikely that any fly issues experienced would be because of site operations at ENRMF. • There are monitoring stations around the site which monitor and collect dust samples daily including two located along the eastern boundary of the site by the cottages. There is a daily deposited dust permit level of 200 mg/m2/day. In June, the daily limit monitored was at 195 mg/m2/day. This is within the permitted levels and can be explained by the capping and restoration work, (which is a short-lived activity) being undertaken on the eastern flanks of the site and the prolonged dry weather experienced. In July, with significantly more rainfall the daily limit dropped to 49 mg/m2/day. • ENRMF has wheel wash systems and a permanently deployed road sweeper to maintain the Stamford Road in a good state of cleanliness. When on a very rare occasion a vehicle does fail to use the wheel wash, the road sweeper is deployed rapidly to clear any material. The site operates a three-strike rule, and the driver is either reprimanded and warned on their next visit to site, or the haulier is informed of the actions of the driver • During periods of rainfall there may be times when some staining of the road occurs which is predominantly muddy water from the vehicles after having been through the wheel wash system.

Year	Total number of complaints received	Comments
		<ul style="list-style-type: none"> • Hauliers who turn up early are parked up on site and held for 30 minutes and the drivers warned about the consequences of turning up early. They are also re-inducted with the site rules. Their companies are informed and the site rules are sent to them all regularly. Inside the site incoming vehicles receive priority and when on occasion there are vehicles waiting to enter the site operatives manage traffic on the Stamford Road to ensure road users are able to safely use the road. Augean stated that they were planning to improve the site entrance to further reduce potential issues relating to traffic entering or leaving site. • Augean requested that the complainant report any incidents of any vehicles not adhering to the site rules so that the matter is followed up and also invited the complainant to a site visit to discuss the matter in person and see how Augean manage operations to ensure they minimise the impacts they have on their neighbours and the wider community. <p>2.(2020) Mud on road – Complaint received on 13 October 2020 regarding mud on the road and concern that it could cause an accident. All of the measures in place to keep the road clean were explained including that lorries sometimes carried out dirty water from the entrance when exiting the site especially during or just after periods of rainfall as experienced that day and over the previous days. The complainant felt that the road sweeper could be more effective and that this happens regularly which was not agreed. The condition of the road was assessed and it was found to be free of mud and debris however a puddle in the site entrance was identified that needed to be cleared.</p> <p>3 (2020) Mud on road – Complaint received on 15 October 2020 regarding mud on the road that had not been dealt with and was reported as leading to accidents. The following points were explained to the complainant:</p>

Year	Total number of complaints received	Comments
		<ul style="list-style-type: none"> • There are several measures in place to deal with this issue such as a pressure washer which is used to clean mud of tyres before vehicles leave the site. • The road was free of mud debris but sometimes lorries carry out dirty water from the entrance when exiting the site especially during or just after periods of rainfall as experienced that day and over the previous days. • As a final measure a road sweeper cleans the road. <p>The condition of the road was assessed and it was found to be free of mud and debris and a puddle in the site entrance was identified and cleared.</p> <p>4 (2020) Mud on road – Complaint received on 16 October 2020 regarding the reported slippery conditions of the road outside the site. The condition of the road was assessed and as the road cleaner had been out on the road the conditions were acceptable. The complainant was informed that the road sweeper was out continuously and would continue to clean all day which was deemed acceptable.</p> <p>5 (2020) Mud on road - Complaint received on 21 October 2020 regarding either a potential spill on the road or that mud was being dragged out from site which was considered to be causing hazardous conditions on Stamford Road. The complainant also complained about the scarring (damaged surface) on the road outside the site which was considered dangerous for small vehicles and bikes. The condition of the road was assessed and it was confirmed that there were no spillages on the road. All of the measures in place to keep the road clean were explained and that lorries sometimes carried out dirty water from the entrance when exiting the site especially during or just after periods of rainfall. It was pointed out that although the road surface is in an unsatisfactory condition, road improvements are a highways issue</p>

Year	Total number of complaints received	Comments
		<p>and therefore are the responsibility of Northamptonshire County Council. The complainant was offered a site visit in order to see the control measures in place and high quality operations. The complainant was pleased with the response and suggested additional signage about slippery roads may be helpful. Augean agreed to look into the possibility of additional signage and to continue to press NCC for the repairs to Stamford Road for which Augean make an annual contribution.</p> <p>6 (2020) Other – Traffic related complaint received on 27 October 2020 regarding reported recent car incidents on the road between Kings Cliffe and Stamford. The Stamford Mercury had contacted the complainant to see what action was going to be taken in order to prevent these re-occurring. The condition of the road surface and the need for repair and regular road washing and also the lack of proper signage were highlighted as potential issues.</p> <p>Augean responded to the complainant highlighting that the repairs to the road surfacing is a Highways Authority responsibility and that Augean had been regularly requesting Northamptonshire County Council for well over a year to undertake the repairs to the road surface.</p> <p>Augean also informed the complainant of the rigorous wheel and chassis cleaning controls at the site including the use of a pressure washer in addition to regularly sweeping of the road.</p> <p>Augean also confirmed that they were happy to contact the Highways Authority in respect of installing appropriate signage which Augean are willing to fund.</p> <p>Since the response from Augean to the complainant, improvements have recently been implemented by North Northamptonshire Council and the highway surface at the entrance to the site has been repaired.</p>

Year	Total number of complaints received	Comments
		<p>Augean also liaised with the former Northamptonshire County Council highways team (now part of North Northamptonshire Council) who are responsible for road signage and they have indicated that the current signage on the Stamford Road could be improved, particularly on the approach to the woods in either direction which has seen a number of accidents due to excess speed and the adverse camber on the highway. Any such signs must be installed by or under the control of the highways team themselves. Augean have indicated to them that they are willing to contribute towards the costs of the signage improvements</p> <p>7 (2020) Mud on road - Complaint received on 10 November 2020 regarding the condition of the road. Augean and the complainant went to the site entrance and looked at the condition of the road. It was agreed that mud on the road was not an issue and that it was instead dirty water from the wheel cleaning operations, including the pressure washer area near the weighbridge. The complainant agreed that it was perception rather than the actual presence of mud, and that speed was a more usual reason for the reported accidents that had occurred over the previous month or so. The complainant felt that Augean were doing all they could to prevent mud and debris going off site, although he felt the pressure washer area would benefit from a sump to collect dirty water. The complainant was offered a site visit at any time in the future.</p>
2021	2	<p>1 (2021) Other –Complaint received on 7 January 2021 when a lorry exiting the site led to a member of the public making an emergency stop. Augean responded to the complainant on 8 January 2021. Augean confirmed that they were able to identify the incident from CCTV footage. Augean consider that the incident could have been avoided had the tanker driver waited until traffic had passed allowing a clearer line of sight of oncoming traffic from the left before pulling out.</p>

Year	Total number of complaints received	Comments
		<p>The number plate of the vehicle was identified and as a result Augean have contacted the haulage company to report the incident and the driver. Augean also confirmed that now that work to the road outside the site has been completed by Northamptonshire County Council Augean are able to conclude the final design stage of proposed improvements to the site entrance and anticipate that the work will be carried out in the next few months.</p> <p>1 (2021) Other –Complaint received on 5 February 2021. Augean was made aware by a member of Kings Cliffe Parish Council that a complaint had been made on the Kings Cliffe Community Facebook Page regarding the safety of the road approaching the landfill site. The complainant stated that they were stuck for about 15 minutes in the middle of a queue of HGVs that were waiting to turn right into the landfill entrance. The complainant had to overtake the HGVs on the wrong side of the road and was concerned due to the curvature of the road. Augean responded to the complaint on 12 February 2021. After a review of the CCTV footage Augean observed that the site was very busy at 7am however there was an experienced traffic controller on the road. At 7:08am two cars heading south towards the village were safely managed past the lorries by the person controlling traffic to keep any delays to a minimum. The road was clear by 7:18am. Augean confirmed that improvements to the site entrance were due over the next couple of months which along with the additional signage planned should alleviate any queues on Stamford Road. Augean requested that any similar concerns be reported directly to Augean to ensure that any problem is addressed directly and confirmed that once lockdown restrictions are lifted the open door policy will resume so that members of the public can come and see the site and the controls in place.</p>

Appendix J
Proposed Development Trip Generation

Estimated traffic movements associated with the ENRMF western extension

Green text is for the assumptions made for the 2012 traffic assessment. Purple text is new capacity/activities for inclusion in the 2021 application.

Calculated on a working week of 5.5days and a working year of 285 days.

Working week of 5.5 days and a working year of 279 days [365-78(Sun & 0.5 Sat) – 8 (Bank hols)].

Operation		Proposed tonnage of material	HGV generation (inbound and outbound)	
WASTE IMPORTATION AND EXPORTATION				
Landfill and waste treatment facility – overall waste input rate		250,000tpa 300,000tpa	30,488/annum 599/week 109/day	28,571/annum 563/week 102/day
Waste treatment facility exportation (50%) of throughput		50% of 150,000tpa = 75,000tpa 50% of 250,000tpa = 125,000tpa	7,500/annum 147/week 27/day	13,158/annum 259/week 47/day
Phase 6		278,000 tonnes over 21 months (84 weeks)	60 per day 330 per week	
Phase 7		179,000 tonnes over 19 months (76 weeks)	44 per day 242 per week	
Phase 8		93,000 tonnes over 22 months (88 weeks)	20 per day 110 per week	
Phase 9		64,000 tonnes over 17 months (68 weeks)	18 per day 100 per week	
Phase 10		70,000 tonnes over 16 months (64 weeks)	20 per day 110 per week	
Phase 11		47,000 tonnes over 21 months (84 weeks)	12 per day 66 per week	
Western extension phasing		Average of 219,281t per phase over 12 months.	23,082 over 12 months 455/week 83/day	
Maximum assumed 2012 assessment	Maximum in 2021 assessment		1,076/week 196/day	1,227/week 232/day