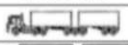
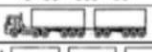
Dear Sir,

I have previously raised concerns about this traffic survey and refer you to my comments of 2/2/24 when I pointed out that the A272 was closed from 20-22nd causing the mayhem experienced on Kent Street and Picts Lane during that time and that the numbers are not representative therefore of usual traffic on the lane.

Below I set out why I believe the Enso Streetwise data is overestimating the current HGV usage of Kent Street, as it has been manipulated to appear that the baseline usage includes a much higher number of vehicles:

The classifications used by Streetwise are likely to mirror classes 1 to 13 below:

Class		Axles	Groups	Description	Parameters	Dominant Vehicle	Aggregate
1	SV	2	1 OR 2	Short - Car, light Van	d(1)>=1.7m, d(1)<=3.2m & axles=2		Light
2	SVT	3, 4 OR 5	3	Short Towing - Trailer, Caravan, Boat, etc.	groups=3, d(1)>=2.1m, d(1)<=3.2m, d(2)>=2.1m & axles=3,4,5		
3	TB2	2	2	Two axle truck or Bus	d(1)>3.2m & axles=2		Medium
4	TB3	3	2	Three axle truck or Bus	axles=3 & groups=2		
5	T4	>3	2	Four axle truck	axles>3 & groups=2		
6	ART3	3	3	Three axle articulated vehicle or Rigid vehicle and trailer	d(1)>3.2m, axles=3 & groups=3		Heavy
7	ART4	4	>2	Four axle articulated vehicle or Rigid vehicle and trailer	d(2)<2.1m or d(1)<2.1m or d(1)>3.2m axles = 4 & groups>2		
8	ART5	5	>2	Five axle articulated vehicle or Rigid vehicle and trailer	d(2)<2.1m or d(1)<2.1m or d(1)>3.2m axles = 5 & groups>2		
9	ART6	>=6	>2	Six (or more) axle articulated vehicle or Rigid vehicle and trailer	axles=6 & groups>2 or axles>6 & groups=3		
10	BD	>6	4	B-Double or Heavy truck and trailer	groups=4 & axles>6		
11	DRT	>6	5	Double road train or Heavy truck and two trailers	groups=5,6 & axles>6		
12	TRT	>6	>6	Triple road train or Heavy truck and three (or more) trailers	groups>6 & axles>6		
14	M/C	2	1 OR 2	Motorcycle	d(1)>=1.18m, d(1)<=1.7m & axles=2		Light
15	CYCLE	2	1 OR 2	Cycle	d(1)<1.18 & axles=2		

Source: Kestral Surveys

The data for Kent Street Southbound on Wednesday 18th October, as an example, is shown below. (page 25 of Enso document). I do not dispute this:

Channel - Southbound

Wednesday 18/10/2023		Vehicle Classes													
Hour	Min	1	2	3	4	5	6	7	8	9	10	11	12	13	TOTAL
0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
2	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
4	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
5	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
6	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
7	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
8	0	6	1	0	0	0	0	0	0	0	0	0	0	0	7
9	0	6	0	0	0	0	0	0	0	0	0	0	0	0	6
10	0	2	1	0	0	0	0	0	0	0	0	0	0	0	3
11	0	4	3	0	0	0	0	0	0	0	0	0	0	0	7
12	0	4	2	0	0	0	0	0	0	0	0	0	0	0	6
13	0	3	1	0	2	0	0	0	0	0	0	0	0	0	6
14	0	6	2	0	0	0	0	0	0	0	0	0	0	0	8
15	0	4	3	0	0	0	0	0	0	0	0	0	0	0	7
16	0	5	1	0	0	0	0	0	0	0	0	0	0	0	6
17	0	6	0	0	0	0	0	0	0	0	0	0	0	0	6
18	0	5	0	0	0	0	0	0	0	0	0	0	0	0	5
19	0	1	1	0	0	0	0	0	0	0	0	0	0	0	2
20	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
21	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
22	0	1	0	0	0	0	0	0	0	0	0	0	0	0	1
23	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Hour Ranges:	7-19	53	16	0	2	0	0	0	0	0	0	0	0	0	71
	6-22	57	16	0	2	0	0	0	0	0	0	0	0	0	75
	6-24	57	16	0	2	0	0	0	0	0	0	0	0	0	75
	0-24	57	16	0	2	0	0	0	0	0	0	0	0	0	75

The figures beyond Class 2 are much the same for any of the days shown, ie a very low number of largely class 4 vehicles.

However, Streetwise then goes on to display this same data as OGV1 and OGV2 classifications. (page 29):

Channel - Southbound **Vehicle Class**

Classes / Day / Time	Car / LGV / Caravan - 1	OGV1 / Bus - 2,3,5,6,7,12	OGV2 - 4,8,9,10,11,13	TOTAL - 1-13
18/10/2023				
7-19	53	16	2	71
6-22	57	16	2	75
6-24	57	16	2	75
0-24	57	16	2	75
19/10/2023				
7-19	90	33	0	123
6-22	99	34	0	133
6-24	99	34	0	133
0-24	99	34	0	133
20/10/2023				
7-19	337	47	1	385
6-22	368	47	1	416
6-24	368	47	1	416
0-24	368	47	1	416
21/10/2023				
7-19	535	69	0	604
6-22	556	71	0	627
6-24	557	71	0	628
0-24	579	78	0	657
22/10/2023				
7-19	181	11	0	192
6-22	181	11	0	192
6-24	182	12	0	194
0-24	182	12	0	194
23/10/2023				
7-19	55	14	1	70
6-22	59	14	1	74
6-24	61	14	1	76
0-24	61	14	1	76
24/10/2023				
7-19	69	17	0	86
6-22	71	17	0	88

You will see that although the numbers are correct within each division, (57 class1, 25 OGV1, 2 OGV2), **all** the OGV1 vehicles are actually from the lowest classification within this group ie Class2, which, from the table above is a light weight, 2 axle short towing trailer or caravan. Most likely in this case to be a horse box. This is certainly not comparable to the HGVs Enso will be bringing down the lane, which will be represented by some of the other classifications in the OGV1 group. Similarly, the OGV2 group covers vehicles all the way up to enormous low loaders they may be using to transport the cable, but the only vehicles in this group which **actually** appear on the data are just 2 class 4 vehicles ie a medium weight, 3 axle truck or bus, probably therefore large horse boxes. The grouping in to OGV1 and 2 is therefore completely misleading, possibly deliberately so.*

I would add that none of the many cyclists we know use this lane were recorded (class 15), as one detector cannot work at both extremes, hence the need for a Non-Motorised User survey if any further consideration is to be given to this inappropriate proposal.

Please reject the application; its location is totally unsuitable.

Kind regards

[redacted]

*With regard to the OGV classifications, these are set out within the Design Manual for Roads and Bridges CD224

https://www.standardsforhighways.co.uk/tses/attachments/257e5888-2bfd-492d-92d4-ecf7d40428b0?inline=true