
Meeting: Traffic Management Meeting
Date: 7 January 2013
Subject: Poynters Road area, Dunstable - Resolution of Objections to a Proposed 7.5 tonnes Goods Vehicle Weight Restriction
Report of: Jane Moakes, Assistant Director Community Safety and Public Protection
Summary: To report to the Executive Member for Sustainable Communities -Services the receipt of objections to a proposed 7.5 tonnes Goods Vehicle Weight Restriction and to seek a way forward.

Contact Officer: Nick Chapman
nick.chapman@amey.co.uk
Public/Exempt: Public
Wards Affected: Dunstable Icknield and Houghton Hall
Function of: Council

CORPORATE IMPLICATIONS

Council Priorities:

To improve the environment for residents

Financial:

The cost of introducing the Order and undertaking the signing and road marking changes will be approximately £85,000

Legal:

None as part of this report

Risk Management:

None as part of this report

Staffing (including Trades Unions):

None as part of this report

Equalities/Human Rights:

None as part of this report

Community Safety:

None as part of this report

Sustainability:

Non as part of this report

RECOMMENDATION(S):**The Executive Member's views are requested.****Background and Information**

1. There have been long-standing requests over many years from residents of Poynters Road to reduce the number of heavy goods vehicles (HGVs) using their road. Many of these drivers are travelling to and from the industrial estates in the Woodside and Porz Avenue area. Poynters Road is predominantly residential and forms the boundary between Central Bedfordshire Council and Luton Borough Council.
2. The main objective of the proposed weight restriction is to prohibit HGVs from using Poynters Road as a through-route. However, to avoid residential side roads being used as alternatives, the proposed weight restriction zone would need to cover a larger zone. Consequently, other roads in both Dunstable and Luton, such as Legrave High Street, Pastures Way, Katherine Drive and Wilbury Drive would be included in the Order. Luton Borough Council supports the proposal.
3. The proposed 7.5 tonnes goods vehicle weight restriction was published in late September 2012. Consultations were also carried out with the emergency services and other statutory bodies, Dunstable Town Council, Houghton Regis Town Council and Elected Members. Local residents, both within the proposed weight restriction zone and on the likely alternative routes were also consulted. Businesses located in the area, such as those in Woodside, were also consulted.
4. A petition opposing the weight restriction and calling for a public meeting signed by 260 residents of Luton Road and nearby streets has been received. A total of 53 individual objections have also been received, mainly from residents of Luton Road. In addition, the Freight Transport Association (FTA) has objected. A solicitor acting on behalf of a business located in Prologis Park in Dunstable has also submitted a detailed objection.
5. A petition signed by 607 residents in support of the proposed weight restriction has been submitted. This was signed by those living in Poynters Road, Legrave High Street and adjoining residential streets in Dunstable and Luton. Houghton Regis Town Council supports the proposal, but asks that the restriction be extended to cover Park Road North. A further 5 representations supporting the proposal have been received, all from residents of Poynters Road.

6. Bedfordshire Police raised no objection to the proposal, but has raised some concerns. They say that the size of the proposed restricted area will make it difficult to routinely Police; a large number of exempt vehicles will be lawfully attending various premises within the restriction which are likely to be interpreted as breaches of the regulation by members of the public generating requests for enforcement attention. In addition, the symbol signed motorway diversion route will have to be changed as it currently uses Poynters Road or an exemption will have to be considered for periods when the M1 motorway are closed which is supported by the Highways Agency.
7. A number of issues have been raised; the main concerns are as follows:-
 - a) The number of HGVs in Luton Road is already high and they are opposed to more using it.
 - b) The information provided about the number of HGVs currently using and forecasted to use Luton Road was inaccurate.
 - c) The footways are narrow and houses are close to the road.
 - d) Children have to walk alongside and cross Luton Road to get to school.
 - e) The road will be more dangerous and accidents will increase.
 - f) Increased air pollution, noise and traffic grime.
 - g) The likely impact on the Air Quality Management Area.
 - h) There will be an increase in damage to the road surface, which is already poor with potholes, collapsed manholes, etc.
 - i) There will be even greater congestion during closures of the M1.
 - j) Poynters Road has wide verges between the road and houses
 - k) The Woodside Connection will not be built for many years and any weight restriction should be delayed until that is in place.
 - l) Extra traffic will use Jeans Way, which is a residential street, to avoid queues on Luton Road.
 - m) One of the main reasons for requesting a weight restriction on Poynters Road was due to speeding lorries, but this is not relevant.
 - n) Residents have been given insufficient time to respond to the proposal.

Observations

8. The following observations relate to the comments as listed in paragraph 7. above.
 - a) Surveys from July 2011 show that the two-way flow of HGVs in Luton Road was 2557 per week. The A505 Luton Road has two lanes in both directions with a partial central reservation and is one of Dunstable's main through routes, where one would expect to find a high proportion of HGV movements. It is a principal road and thus designated as a main arterial route.
 - b) Surveys carried out in July 2011 showed that a total of 1655 HGVs per week used Poynters Road. If we assume full compliance with the proposed weight restriction and that all excluded vehicles would use Luton Road as an alternative, this equates to an approximate figure in excess of 300 additional HGV movements per day on Luton Road. Exact numbers cannot be predicted as some will legitimately continue to use Poynters Road.

- c) The footways alongside Luton Road are of reasonable width, averaging approximately 2 metres wide, which is sufficient to enable pedestrians to pass when meeting. It is acknowledged that the volume and speed of traffic is likely to make pedestrians feel quite vulnerable. Most properties do have relatively short front gardens.
- d) There are several schools in the area, so there will inevitably be some school children crossing and walking along Luton Road. There are adequate formal crossing facilities along this length of road, together with numerous traffic islands providing informal crossing points.
- e) Since 1 January 2007 there have been two injury collisions involving goods vehicles over 7.5 tonnes on the relevant length of Luton Road. One occurred at the Poynters Road roundabout and the other at the Eastern Avenue junction. Both were junction turning incidents and resulted in slight injuries to the vehicle occupants. It is unlikely that the increase in HGV movements in Luton Road would lead to a significant rise in the number of collisions involving these vehicles.
- f) It is acknowledged that the increased numbers of HGVs in Luton Road is likely to bring about an increase in noise and traffic dirt. However, Luton Road is already a heavily trafficked through route and these increases will be minor in nature.
- g) Local authorities have a responsibility to review and assess air quality in their area. This involves measuring air pollution and trying to predict how it will change in the future. Luton Road is currently included in the Dunstable AQMA (Air Quality Management Area). Currently there is one air quality sensor in Luton Road in the vicinity of Boscombe Road that currently shows results in excess of the monitoring level for nitrogen dioxide (see Appendix G). The additional numbers of HGVs in Luton will inevitably have some effect on the levels of nitrogen dioxide.
- h) There is likely to be a slight increase in road surface wear, which may increase the frequency of maintenance required. This would be offset by reduced damage to the road surface in Poynters Road, therefore no significant change in the overall maintenance burden.
- i) Closures of the M1 can have a significant impact on traffic in Dunstable, but the increase in HGVs in Luton Road resulting from the weight restriction would be a small factor when viewed alongside the substantially increased numbers of lorries diverted off the M1 on a purely temporary basis.
- j) Poynters Road does have grass verges along much of its length and, therefore, homes are generally set back further from the road. However, Poynters Road is a single carriageway road, of lower classification than Luton Road and is generally less suited to carrying high volumes of HGV traffic.
- k) Construction of the Woodside Connection road scheme is expected. Once opened this would be a very attractive route for HGVs wishing to access the industrial areas in Woodside, Porz Avenue and Boscombe Road from the new M1 junction 11a. Consequently, the scheme will bring about a significant reduction in traffic in Poynters Road and Luton Road.
- l) The additional numbers of HGVs on Luton Road are not expected to have a noticeable effect on traffic delays, so should not increase traffic in parallel residential streets, such as Jeans Way. Should the weight restriction be implemented, traffic surveys could be carried out to determine if there is any displacement of traffic.

- m) Speeding lorries in Poynters Road was a reason put forward by the original petitioners, but it is accepted that excessive speed occurs but is a more general issue affecting all vehicles. This is not one of the main reasons for the proposed weight restriction.
- n) The correct traffic Order procedures have been followed. A local authority must publish notices in a local newspaper and consult with certain organisations, such as the emergency services and haulage organisations. Other forms of publicity, such as street notices, letters to individual households and publication on the Council's website are optional, but were all carried out on this occasion.

9. The Police's concerns about enforcement are accepted. This type of area-wide restriction does present some enforcement difficulties for the Police mainly because of the exemption which allows HGVs to enter the restricted zone for loading/unloading purposes. Consequently, the Police need to prove that a HGV driver had no legitimate reason for being in the restricted zone. However, there is no other practical way of restricting HGVs from using residential streets.

The motorway symbol signing system in this area is used to provide a diversion route for all vehicles between junctions 11 and 12 of the M1 during emergency or night time closures of the M1. If the weight restriction is introduced, the signs for this would be altered to remove Poynters Road from the diversion route.

10. Houghton Regis Town Council's suggestion of including Park Road North would have wider implications for HGV movements in the area and would lead to further displacement of larger vehicles. Such a proposal would need significant investigation work.

Conclusion and way forward

11. It is clear that this proposal has aroused considerable local interest. The residents of Poynters Road have been campaigning for many years for measures to restrict use of the road by HGV's.

Equally, now that a firm proposal has been brought forward the residents of Luton Road feel that it is an imposition to direct additional HGV's onto what they consider to be an already congested route with pollution problems and have set out those concerns in their responses.

There are a number of issues that have been raised and whilst some of these are mentioned in the responses to individual issues above they can be summarised here.

- That the A505 Luton Road is a main arterial route designated for such use whereas Poynters Road is not.
- Whilst air quality undoubtedly is an issue in the short term the medium to longer term will see the implementation of the M1-A5 link and Woodside connection that will remove the bulk of the HGV's and thus reduce the harmful components of the emissions.

	<ul style="list-style-type: none"> • That of the air quality monitoring points the one where the corrected figures habitually exceed the guide levels is close to Boscombe Road junction and thus this is likely to be due to the emissions of standing traffic. • The traffic signals at Boscombe Road are to be refurbished in Feb/March 2013. This will enable the signals to work more closely with the signals at West Street and improve flows. This together with the implementation of two lanes into Dunstable through the junction should reduce congestion and thus improve air quality at the junction.
12.	<p>A further meeting has been held with officers responsible for monitoring the air quality to discuss the likely outcomes of the changes in relationship to the current levels of Nitrogen Dioxide.</p> <p>As stated there is only one air quality sensor in Luton Road that habitually shows a corrected result in excess of the threshold level. This is situated close to Boscombe Road junction and thus receives NO_x readings from the traffic queuing at this junction. The effects of the additional HGV's on these readings are not known but there must be a presumption that additional vehicles will emit additional NO₂. This has been estimated to be in the order of 1.1 µg/m³.</p> <p>It must be noted that year on year measured NO₂ readings have been falling generally. This is supported by Defra who predict a continued fall due to improvements in vehicles. Predicted levels in three years time are therefore lower than at present even with the additional HGV's. The improvements to traffic flow and other reductions in cars and buses are therefore likely to take this even lower. These mitigations are shown below.</p> <p>In mitigation of this there are additional current initiatives that will improve this situation at the Boscombe Road gyratory.</p> <p>There are currently plans to implement changes this financial year to improve the Boscombe Road signals. This will comprise the replacement of the outdated signal equipment, the cutting of new detector loops to replace those that have failed thus enabling the signals to work with the A5 signals via 'SCOOT' software and the installation of additional 'Mova' software to the gyratory system, which should improve traffic flow.</p> <p>In addition to the recent guided busway works that have delivered an extra traffic lane in to town there will be further minor highway works undertaken to allow this additional lane to start at the gyratory thus increasing the overall capacity of the highway between Boscombe Road and the town centre. This will give some increase in capacity though it is limited as the road does eventually narrow back to a single lane.</p> <p>These initiatives together will reduce the queue length and duration on the inbound approach to the gyratory and thus reduce the level of airborne NO₂. It is impossible to predict exactly what effect this will have or whether the combined actions will reduce the measured pollutants to below the overall threshold level at this measurement point.</p>

	<p>Additionally with the opening of the busway and the consequent improvement in bus reliability there is predicted to be a reduction in car journeys as a result. There will also be a reduction in the bus journeys using the A505. These together will also reduce the airborne pollution levels.</p> <p>There should, also, be visible benefits for traffic.</p> <p>Previous traffic modelling has also indicated that there would be minimal effect from the additional HGV's in respect of queue length which is affected much more by obstructions beyond the junction, i.e. traffic converging into one lane, than by the number of vehicles itself.</p>
13.	<p>A further initiative that has been agreed is to measure the NO2 levels at various points on Poynters Road over the next few months. As this is not in the AQMA there are no figures for it but it has been considered that this is useful information that should be collected.</p>
14.	<p>At the time of the production of the Local Area Transport Plan there was less certainty of the implementation of the Woodside connection or the M1-A5 link roads which will provide direct links to Dunstable industry from the trunk road network. The opportunity to fund the implementation of the weight restriction through Poynters Road and associated area was therefore taken to give medium term relief to that road. Such area wide orders are costly due to the numbers of signs required.</p>
	<p>It should be reiterated that although the additional traffic on Luton Road will not be popular it is a principal road intended to carry main road levels of traffic through to the A5. The levels anticipated will not take Luton Road over capacity and the modelling at the Boscombe Road junction does not indicate a significantly greater problem there.</p>
	<p>Poynters Road is to be resurfaced early in 2013 and this will reduce the noise and vibration problems considerably. The ongoing levels of traffic have taken a toll on the road construction which was not designed originally for this level of traffic.</p>
	<p>The Council has many functions and as highway authority needs to manage the flow of traffic and highway maintenance as well as looking at air quality and other traffic flow related issues. It therefore is required to balance these diverse issues against each other and also the needs and wishes of residents.</p>
	<p>The predictions would indicate that the pollutant levels will reduce over time despite any changes that are made and with the additional mitigations there would seem little reason not to implement the weight limit. Timing is important to avoid several schemes occurring at the same time and this is discussed below.</p>

	<p>There are currently a number of major schemes that are also affecting traffic flows in this area namely,</p> <ul style="list-style-type: none">• The guided busway works• Court Drive scheme• The construction of Morrisons store in Houghton Regis.
	<p>These schemes are all due to be completed around March 2013 at which time it will be possible to implement the works to the traffic signals at Boscombe Road.</p> <p>Following the works to the signals it will be then possible to undertake the resurfacing of Poynters Road and the further works to implement the weight restriction.</p>

Appendices:

Appendix A – Scheme drawing

Appendix B – Public notice

Appendix C – Police response

Appendix D – Houghton Regis Town Council response

Appendix E – Petition against and objections to the proposal

Appendix F – Supporting petition and other positive representations

Appendix G – Air Quality Information

APPENDIX A



PUBLIC NOTICE

CENTRAL BEDFORDSHIRE COUNCIL PROPOSES TO INTRODUCE 7.5 TONNES HEAVY GOODS VEHICLE WEIGHT RESTRICTIONS IN THE POYNTERS ROAD AND LEAGRAVE HIGH STREET AREA OF DUNSTABLE AND LUTON

Reason for the proposal: The proposed Order is considered necessary on the grounds of promoting road safety and improving the environment of the area. The Order would prohibit HGVs over 7.5 tonnes from entering the zone identified below and using the roads within as through routes. Therefore, Central Bedfordshire Council, with the agreement of Luton Borough Council, proposes to make a Traffic Regulation Order as follows:

Effect of the Order:

To introduce a 7.5 tonnes HGV Weight Restriction Zone on the following area of Dunstable and Luton:-

That area bounded by the Central Bedfordshire and Luton Borough boundary from Poynters Road to Pastures Way, Pastures Way to its junction with Kestrel Way, Kestrel Way to its junction with Ravenhill Way, Ravenhill Way to the east corner of the boundary of no.115 Ravenhill Way, a line across the rear boundaries of no.115 Ravenhill Way to no.10 Runham Close, a line between the east corner of the boundary of no.10 Runham Close to Leagrave High Street, Lewsey Road, Dunstable Road, Luton Road, a line from Luton Road to the west corner of the boundary of nos. 113 and 115 Ridgeway Avenue, a line extending to Poynters Road and Poynters Road to its junction with Wheatfield Road, but not including Lewsey Road, Dunstable Road or Luton Road.

Exemptions: The proposed Order will include exemptions to allow heavy goods vehicles to enter the restricted zone for access and delivery requirements. There will also be exemptions for essential uses, such emergency vehicles and maintenance purposes.

Revocations: If the proposed Order comes into operation the Borough of Luton (Traffic Management) Order 2011 will be varied to revoke the existing No Entry to Heavy Commercial Vehicles restrictions from Leagrave High Street into Pastures Way and from Poynters Road into Wheatfield Road.

Further Details of the proposals and plans may be examined during normal opening hours at Dunstable Library, Vernon Place, Dunstable LU5 4HA or online at www.centralbedfordshire.gov.uk/consultations. These details will be placed on deposit until 6 weeks after the Order is made or until it is decided not to continue with the proposal.

Objections: should be sent in writing to the Transportation Manager, Bedfordshire Highways, Woodlands Annex, Manton Lane, Bedford MK41 7NU or e-mail centralbedsconsultation@amey.co.uk stating the grounds on which they are made by 26th October 2012.

Order Titles: If made will be "Central Bedfordshire Council (Poynters Road and Leagrave High Street area, Dunstable and Luton) (Weight Restriction) Order 201**"

Technology House
Amphill Road
Bedford MK42 9BD
26th September 2012

Basil Jackson
Assistant Director for Highways

APPENDIX C



PROPOSED 7.5 tonne HGV weight restriction – Poynters Road and Leagrave High Street area of Dunstable and Luton.

<p>This Authority has considered the proposed Traffic Regulation Order as outlined in your email and attachments dated the 25th September 2012, and offer the following comments for further consideration.</p> <p>Comments It is anticipated that the signing of this weight restriction will cause the majority of HGV drivers to comply with the restriction. The size of the proposed restricted area will make it difficult to routinely Police; a large number of exempt vehicles will be lawfully attending various premises within the restriction which are likely to be interpreted as breaches of the regulation by members of the public generating requests for enforcement attention.</p> <p>The symbol signed motorway diversion route will have to be changed as it currently uses Poynters Road or an exemption will have to be considered for periods when the M1 motorway are closed.</p>	<p>X</p>
<p>This Authority has considered the proposed Traffic Regulation Orders as outlined in your email with attachments dated the 25th September 2012, together with the reason(s) given. The proposals are accepted by this authority, therefore no objections will be offered.</p>	<p>X</p>

Name: - ...Steve Welham

Address ...Traffic Management Unit,
Bedfordshire Police.
Bedfordshire & Hertfordshire Road Policing Unit.
Halsey Road,
Kempston, Beds.
MK42 8AX.

Signed:- ...S. P. Welham.

APPENDIX D



HOUGHTON REGIS TOWN COUNCIL

Peel Street, Houghton Regis, Bedfordshire, LU5 5EY

Telephone: 01582 708540 Fax: 01582 861102

Email: info@houghtonregis.org.uk Website: www.houghtonregis.org.uk

Mr N Chapman
Transportation Manager
Highways & Transport
Woodlands Annex
Manton Lane
Bedford
MK41 7NU

DOCUMENT REF	150 815
	AMEY
CONTRACT	BEDFORDSHIRE HIGHWAYS
ACTION Y/N	BY <i>[Signature]</i> GPB
25 OCT 2012	
PIES	
FILE NO.	

23rd October 2012

Dear Mr Chapman

Re: Proposed 7.5 tonnes HGV Weight Restriction – Poynters Road and Legrave High Street areas, Dunstable and Luton

I write to inform you that the Town Council is supportive of the above proposal, but would urge you to consider extending the restrictions to include Park Road North. It is feared that without this in place HGVs are likely to use this route as an alternative to the A505.

Yours sincerely

Stuart Oliver
Deputy Town Clerk

APPENDIX E

Petition Against Proposal

7th November 2012

Dear Sir/Madam

I write with regards to the recent announcement by the Central Bedfordshire Council that it was proposing to re-route 300+ lorries from Poynters Road along Luton Road, Dunstable.

The reason stated was to prevent noise and pollution for the residents of Poynters Road from heavy goods vehicles accessing the Woodside Industrial Estate from the Motorway M1 junction 11. The following residents wish to make it clear that this is unacceptable and wish to make their voices heard with a view to re-visiting this proposal to ensure that all residents and road-users in the areas surrounding Luton Road are also afforded the same consideration as those in Poynters Road.

The enclosed petition shows 260 signatures and comments from residents and visitors and, on behalf of every one of these people who have felt the urgency to sign this petition, I would ask that you arrange a public meeting as soon as possible to ensure that the full ramifications of this proposal are explored, considered and, if necessary cancelled.

You may contact me at anytime on my mobile number and I will happily arrange with residents to attend this meeting. I would suggest the venue as the Luton Road Methodist church hall to ensure the largest possible attendance.

FTA Letter

Dear Sirs

Re: Proposal to introduce 7.5 tonnes weight restriction in the Poynters Road and Leagrave High Street area of Dunstable and Luton

On behalf of the Freight Transport Association, I would like to register my objection to the above proposal.

Please can you confirm what traffic monitoring data underpins this proposal as it is essential that the facts are established before anything is proposed? Has an Economic Impact Assessment been undertaken to ascertain the effects that this is likely to have on local businesses/employers? Has consideration been given to the impact that these proposals may have on alternative routes? Has the impact on air quality been taken into account, with particular reference to the existing Air Quality Management Area on the A505 from the town centre to its junction with Poynters Road?

I understand that Poynters Road is used by HGVs due to the serious congestion caused by the poor management of the A505 Luton Road/Boscombe Road gyratory. If this junction was better managed to prevent congestion, HGVs would follow Boscombe Road therefore rendering the weight restriction unnecessary.

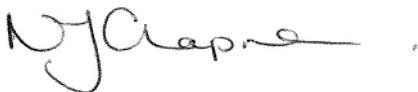
Whilst of residential nature, Poynters Road is not unsuitable for HGVs. It has wide pavements separated from the carriageway by grass verges.

I am particularly concerned about the assertion on the petition which initiated this proposal which according to documents on Central Bedfordshire Council's website claims that *HGVs are travelling in excess of the speed limits and are causing disturbance to residents and damage to the road and properties is incredibly subjective and should be substantiated*. If there is indeed a problem with speeding along Poynters Road, it is likely that it is an issue with all vehicles and not just HGVs. This will not be resolved by a lorry ban, but instead by better enforcement of the current speed limit.

Congestion seriously impacts local businesses as well as the local environment and lorry bans result in HGVs taking longer less direct journeys.

I therefore request that Central Bedfordshire Council does not implement the proposed weight restriction at least until the full facts have been established and would urge that solutions are based around measures to tackle the congestion issues outlined above.

Yours faithfully



Natalie Chapman
Head of Policy for London, South East & East of England
Freight Transport Association



DLA Piper UK LLP
3 Noble Street
London
EC2V 7EE
United Kingdom
DX 33866 Finsbury Square
T +44 20 7153 7679
F +44 20 7796 8666
W www.dlapiper.com

Transportation Manager
Bedfordshire Highways
Woodlands Annex
Manton Lane
Bedford
MK41 7NU

Your reference

GPB/52499/3.12/600463

Our reference

ET/NW/344082/1
UKM/45544191.2

25 October 2012

By Special Delivery

By Email to: centralbedsconsultation@amey.co.uk

Dear Sirs

**PROPOSALS TO INTRODUCE 7.5 TONNES HEAVY GOODS VEHICLE WEIGHT RESTRICTION IN THE POYNTERS ROAD AND LEAGRAVE HIGH STREET AREA OF DUNSTABLE AND LUTON
OBJECTION BY A S WATSON (HEALTH AND BEAUTY UK) LIMITED**

We act on behalf of A S Watson (Health and Beauty UK) Limited. Our client is the occupier of Unit 1, Prologis Park, Dunstable.

A letter dated 27 September 2012 from Nick Chapman, Transportation Manager of and on behalf of Central Bedfordshire Council ('CBC') was received by our client informing them that CBC is proposing to introduce a 7.5 tonnes heavy goods vehicles weight restriction in the vicinity of and affecting a principal highway access to our client's property. Our client has received no previous correspondence concerning these proposals even though the weight restriction would have a significant and direct effect on our client's business operations.

A S Watson (Health and Beauty UK) Limited objects to the above proposal to introduce a weight limit and requests that the proposed order is not made. We set out the grounds of the objection below.

1. The Traffic Regulation Act 1984 ('1984 Act')

1.1 Section 1 of the 1984 Act sets out the purposes for which a traffic regulation order can be made and section 122 contains a list of matters to which CBC must have regard when making a traffic regulation order. Clearly there are tensions between the different considerations, such as between securing the expeditious, convenient and safe movement of traffic and protection of the amenities of an area. However, it is expected that a balance should be achieved between such competing objectives. Such a balancing exercise has not been carried out, and the information currently before the CBC appears to be insufficient to allow such a balancing exercise.

1.2 The public notice cites 'promoting road safety and improving the environment of the area' as the reasons for the weight restriction proposals. This has not been substantiated by independent expert evidence (see below) as to risks to safety or an existing problem with amenity.

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UK switchboard
+44 (0)8700 111 111



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2. Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 ('Regulations')

- 2.1 The Regulations set out the procedure to be followed when making a traffic regulation order. Regulation 6 sets out specific consultation requirements. Whilst there is no specific statutory requirement to consult with the public at large, most traffic authorities undertake non-statutory consultation process. In fact, we understand that CBC has carried out such consultation with residents of the area but has not consulted with our client. Consultation must be procedurally fair and a consultation which excludes significant interested parties affected by the proposals fails this test. Lack of proper consultation and the consequent procedural unfairness makes the proposals for the weight restriction unsafe.
- 2.2 Schedule 1 to the Regulations sets out the contents of the public notice including the requirement to include a statement about the availability of supporting documentation for inspection. There is a lack of supporting documentation for the proposed order. Only the public notice and accompanying plan is available for inspection. There are no documents on deposit substantiating the reasons for the proposals. In particular, we have not seen any evidence of rigorous safety, transportation, environment, regulatory and economic assessment. There is no evidence of CBC having had regard to such material considerations and of carrying out a balancing exercise between the competing interests of various road users.

3. Background to the proposed weight restriction

Regeneration of Dunstable

- 3.1 The industrial estates in Dunstable, including the Prologis Park, form a major employment area providing much needed employment and job opportunities for residents. The freight and logistics industry is an important element of the employment for people living and working in Central Bedfordshire. Around one in every twenty businesses registered in Central Bedfordshire are transport and storage operators. A further 55.2% are engaged in sectors that directly rely upon transport operations. In terms of employment 4.8% or around 4,100 people working in Central Bedfordshire were employed by transport and storage operators in 2008. A further 46.8% worked in industries that rely directly upon transport operations.¹
- 3.2 The Prologis Park was granted planning permission in 2006 by the then local planning authority, South Bedfordshire District Council ('SBDC'). SBDC recognised the significant contribution this development made to the regeneration of Dunstable. Anne Bereton, Deputy Chief Executive of SBDC said: "The development makes a huge improvement to the area and we are delighted that it will be bringing new job opportunities to the town." In fact,

¹ Central Bedfordshire Freight Strategy April 2011

our client's operations at Prologis Park created around 500 new jobs on their own.

- 3.3 When resolving to grant planning permission SBDC considered the Prologis Park development's impact on the highways and secured adequate mitigation measures by attaching conditions to the planning permission and also including highway related obligations in the relevant planning agreement dated 20 February 2006 to ensure highway safety and to safeguard the residential amenities. The need for development and economic growth and the interests of the residents nearby both have been taken into account and adequately balanced. So far as we are aware, there has been no material change in circumstances relating to traffic since that date.

Petition by residents

- 3.4 We understand that the proposal for the weight restriction was initiated by a petition made by residents living along Poynters Road. A copy of this petition is not publically available. However, from various references in other documents available on CBC's website it appears that the petition requested a weight restriction because 'heavy goods vehicles were travelling in excess of speed limits and caused disturbance to residents and damage to road and properties'². The petitioners requested a weight limit covering the night time 8pm to 8am period and the installation of speed cameras³.
- 3.5 Importantly, there is no evidence available to substantiate these claims and the current proposals for the introduction of a weight limit go beyond the night-time ban requested by the petitioners (which is not itself justified or acceptable in any case).

The Woodside Connection

- 3.6 It is accepted by CBC that Poynters Road forms a key access for heavy good vehicles travelling to and from the Woodside Industrial Area. CBC is also aware that it forms part of a diversion route from M1 in the event of the motorway being closed as a result of an incident. In addition, CBC confirmed that the provision of the proposed 'Woodside Connection' from a new junction in the M1 would provide an alternative route for HGVs to access the industrial area from the M1⁴ in the near future. However, this main alternative access route was not assessed as part of the proposals for the weight restriction.
- 3.7 The inquiry into the A5-M1 Link (Dunstable Northern Bypass)⁵ considered the role of the proposed Woodside Connection and the Highways Agency's view was that the completion of the Woodside Connection would enable

² Review of adequacy of response to petitions

³ Minutes of West Luton Area Committee 22 July 2009 and 26 January 2010

⁴ Minutes of Traffic Management Meeting 20 October 2009

⁵ March 2012

restrictions to be introduced on heavy goods vehicle movements for example on Poynters Road. Acting reasonably, only the completion of the Woodside Connection creates a position where a freight ban by weight restriction can be introduced. CBC's Local Transport Plan ('LTP') confirms this logical sequence of events 'The scheme [the construction of the Woodside Connection] would enable the removal of inappropriate HGVs trips.'⁶

- 3.8 CBC indicated to the Planning Inspectorate that it intends to seek a development consent for the Woodside Connection in 2013 with the intention to commence work in 2014.⁷ The Executive Member for Sustainable Communities (Strategic Planning and Economic Development), Councillor Nigel Young commented: 'By providing a convenient link between the industrial areas and the trunk road network, the road will stimulate further economic investment and will help provide much needed employment and job opportunities for residents ... it will significantly reduce the number of heavy goods vehicles in residential streets, reducing noise.'⁸
- 3.9 The lack of consideration of this or any other alternatives is a significant flaw in the proposals for the introduction of the weight restriction. There is insufficient evidence to enable our client or others to understand the proposals or CBC's views of the proposals. In addition, it would be unreasonable to introduce a weight restriction prior to the opening of the Woodside Connection (which is scheduled for completion in 2016). Only the completion of this alternative will enable the introduction of weight restriction on the current key access route to this major employment area.

Residential amenity and highway safety

- 3.10 Luton Today reported on 18 April 2012 that Colin Baxter of the Poynters Road Action Committee 'can't sleep in the front of the house any more, the noise is horrendous. Most of the traffic goes to the Woodside Estate. It is getting to the stage where it is unbearable ... Because of the bus-way being built we have lorries going past that are fully loaded, and then coming back empty and making an awful sound as they go over the potholes.' Whilst this amounts to assertion via the media - and you have not produced environmental health officers' evidence supporting this - the implication is that the main amenity concern is noise. However, the most objectionable noise (such as it may be) is generated by the temporary construction traffic for the bus way works, and not by lorries accessing Prologis Park. The introduction of weight restriction would be wholly disproportionate and unreasonable in the circumstances.

⁶ Achieving the Transformation 2

⁷ Meeting Note 12 August 2012

⁸ Rita Egan blogspot 2 October 2012

- 3.11 The article also cites Councillor Nigel Young (responsible for the Dunstable Ickniel ward)⁹ at CBC saying 'Subject to consultation we do intend to implement a freight ban. We know the junction of Boscombe Road and Luton Road isn't everything it should be, it can be a real bottleneck there at peak times. We want to understand whether and how we can make changes to the traffic flows there. As soon as we understand that we will go out to consultation with residents in Poynters Road and Luton Road.'
- 3.12 Councillor Young's comments contradict the purported safety reasons for the proposed freight ban in the area. On closer examination, and supported by the findings in the Local Area Transport Plan Baseline Report¹⁰, the junction at Boscombe Road is already over capacity creating a bottleneck in peak times and the most notable clusters of personal injury accidents include both the A505/Poynters Road and the A505/Boscombe Road key junctions.
- 3.13 Diverting the HGVs onto Boscombe Road would worsen an already bad situation not only from a road safety but also from an environmental perspective. The increased idling times of vehicles would increase CO2 emissions and impede air quality in the area. The overall impact will be more NOx and particulate emissions than is currently the case.
- 3.14 Poynters Road itself is wide, has broad grass verges between the road and the footpath and has three pedestrian crossings all with traffic lights to control vehicles. Vehicles and pedestrians are kept well apart and as such the road does not constitute a safety risk, and it is not an accident blackspot requiring intervention on the grounds of road safety.
- 3.15 The newspaper article also highlights the very serious shortcoming of the consultation process, the singular focus on the residents' views at the expense of local businesses. It expresses "intention", which suggests that the consultation is no more than lip-service given a predetermination or bias in respect of the outcome. Clearly this is a very significant procedural flaw making the weight restriction proposals procedurally unsafe. Our client's experience has been the same. It has not been contacted about the proposals prior to receiving a copy of the public notice of the order.

4. Impact on A S Watson's operations

- 4.1 The proposed weight restriction would have very serious consequences for our client's business and the environment. The increased journey times and consequent delays would mean an annual cost increase for the business of £424,580.00. In today's economic climate such a significant cost increase cannot and should not be absorbed by the business. CBC has made no provision for compensation for the effect upon the valuable interest of our client in property.

⁹ NB Councillor Young is also the Executive Member for Sustainable Communities with responsibility for carrying out the functions of the Council as Traffic Authority under the 1984 Act

¹⁰ Dunstable and Houghton Regis January 2011

- 4.2 The Freight Strategy¹¹ sets out the requirement: 'When considering imposition of vehicle bans the Authority [CBC] will take into account of the additional costs to businesses and environmental impacts resulting from lorries taking longer, less direct journeys.
- 4.3 Neither the additional costs to businesses nor the environmental impacts have been taken into account by CBC contrary to the requirement in the adopted Freight Strategy. No evidence of research into such matters appears to exist. Our client's operation is only one of many affected by the proposals. The annual CO2 impact would increase by 7224.88 kgco2 - based on 40 minutes delays at peak times - just from our client's operations. The cumulative increase of CO2 impact arising from all the businesses affected by the proposals would be substantial. This very significant and unnecessary, negative effect on the environment has not been taken into account by CBC.
- 4.4 The vision of the LTP is to enable the efficient transportation of freight and to minimise the negative impacts of freight trips on local communities. The proposed freight ban fails to balance these competing interests in accordance with the LTP.

5. Conclusion

- 5.1 The proposals for the weight restriction are flawed on the basis of road safety, environmental, transportation, regulatory and economic grounds. They are also flawed procedurally. Lack of consultation, failure to have regard to material considerations in terms of the approach to safety, environment and transport and the failure to consider alternatives makes the proposals unlawful. It would be unsafe and unreasonable to proceed with the proposals.
- 5.2 We request on behalf of our client that:
- 5.2.1 CBC desists from its proposed order for the reasons set out above; or
- 5.2.2 That if it is disposed to proceed it should do so based upon a proper evidence base that is subject to full and appropriate consultation, including with businesses.
- 5.3 Should CBC proceed we reserve our client's rights to take action to protect its interests and to amend or add to this objection.

Yours faithfully



DLA PIPER UK LLP

¹¹ Central Bedfordshire LTP Appendix D Freight Strategy April 2011

Individual objections

I wish to object in the strongest terms to this proposal, the effect of which will increase traffic along Luton Road In Dunstable by some 300 vehicles a day.

This road , whilst being a dual carriageway is particularly unsuited to this type of traffic due to the narrow pavement and proximity of houses to the highway.

I believe that if this proposal is implemented it will be extremely dangerous and will potentially substantially increase the number of fatal accidents affecting pedestrians . The width of the pavement and the size of the gardens ,which were dramatically reduced to allow for the road to be widened some 30 years ago, would also increase the danger to households. The huge increase in traffic will affect our homes both in terms of structure and value.

I note that Poynters Road has a grass verge between the road and the pavement along its full length.

I look forward to your response.

I can confirm that I strongly object to the proposed scheme for the following reasons:

1. There is already a large number of HGVs using the Luton Road and by funnelling more lorries into the area will make living conditions unbearable. HGV traffic along the Luton Road starts as early as 3.30 am in the morning with an exponential build up until 9.30 am. Obtaining a decent nights sleep is already difficult due to traffic noise from lorries, and the problem will only be exacerbated if you continue with your proposal. It is also likely that trucks will start using the Luton Rd even earlier to avoid rush hour congestion, so the residents can look forward to heavy goods traffic for 24 hours a day.
2. The Luton Rd is used by many children (including my own) who walk to school and the lorries using the road come dangerously close to the kerb with no consideration for child welfare or safety. The situation is even worse on rainy days as these vehicles cause excessive spray which means children are soaked by the time they arrive at school. At least in Poynters road there are grass verges either side which segregate the children and other pedestrians from oncoming traffic.
3. Currently the speed restrictions along the Luton road are ineffective and the HGVs just speed surf in-between the speed cameras. I happen to live in a section of the road mid-way between speed cameras and the lorries often travel at 50 - 60 mph along this section before slowing down at the bottom of the hill where the speed camera is located. When travelling at speed the lorries make even more noise and vibration.
4. Pollution is already a major issue along the Luton Road as is evidenced by the dirt and traffic grime that accumulates on the outside of the houses that face onto the road. Your proposal will only further reduce air quality along the road.
5. Many of the drain and manhole covers that are positioned in the road have already been damaged due to the excessive weight of these vehicles. Once damaged or distorted these covers then smash against the lip of the seating frame every time a vehicle goes over it causing a loud clanging reverberation. The Council has already tried to repair these covers unsuccessfully so now you want to batter them further with an extra 300 trucks a day.
6. Road works are a common sight on the Luton Road as a result of the heavy traffic and the wear and tear that this causes to the road surface. This results in major delays when trying to travel into Dunstable and the additional 109,500 HGVs per year that you plan to channel through will ensure that road repairs and re-surfacing works will be an ongoing feature.
7. The condescending letter from Nick Chapman suggests that Luton Rd traffic will eventually subside when the Woodside Connection improvement scheme has been completed. What he failed to tell us that this scheme is not even programmed to start until 2014 and will take 2 -3

years to complete (that is if the scheme isn't shelved in the interim by government cut backs) In the meantime the Luton Road residents can just grin and bear it for the next 5 years while over 1.36 million trucks (based on Mr Chapmans percentages) happily roll on past their homes.

8. The proposal to make adjustments to the traffic signals at the A505 Luton Rd / Boscombe Rd Gyratory is not going to have any effect whatsoever. Ultimately the HGVs coming from the centre of Dunstable via Church Street and the Boscombe Rd HGVs are, in the main, heading for the M1 Motorway, therefore any reconfiguration of the traffic signals will do nothing to reduce the number of lorries pouring onto the Luton Rd from every direction.

In view of the above I hope that you will see sense and abort this new scheme before you turn our road into a 24 hour freeway for goods vehicles.

I would like to object to the above proposals on the following grounds:

The proposal will restrict the access to the Woodside Industrial Estate and the larger vehicles will be using the A505 Luton Road and I understand the increase in vehicles is likely to be 300. The Luton Road is not fit to manage the amount of increased traffic, the current level of traffic has led to the collapse of a redundant drainage system along the Luton Road which was previously used to collect the surface rain water when the road was a single carriage way many years ago. This drainage system has collapsed at various points along this stretch of road and I along with numerous other residents have been waiting nearly 6 months to have the metal works, which rattle day and night fixed. This in itself is unacceptable without the proposed increase in larger vehicles using this road.

Children of residents who live in Allenby Avenue, Jeans Way, Kingsbury Gardens, Dale Road and many other roads which back onto Blows Downs have no option but to cross this road to access the local schools. If this proposal was to go ahead there would be a need for Cross Patrol Assistants at the pedestrian controlled traffic lights, an additional cost to the authority, this service is currently provided by Luton Borough Council on the Dunstable Road part of the A505 which supports this amount of traffic which then normally have the option to use either Luton Road or Poynters Road to access the Woodside Estate.

This also begs the question why was this drainage system not dealt with if it is no longer required when the Luton Road stretch of the A505 was resurfaced in 2009.

We received notice of a change of boundary for HGV's. According to your information you propose to send another 300 HGV's past our home. It is of great concern to us as we feel we already have more traffic than other parts of Dunstable pass us and more can only be causing more pollution for us to breathe in and more wear and tear on our house with the vibration of HGV's.

If you feel that this is what you are going to do then major work needs to be done on the road, as it's falling apart already with pot holes and loose drain covers causing noise every time a car goes over it let alone more HGV's and noise from HGV's hitting holes causing loud clanging noises.

I feel that we have been left out of the loop while this has been decided and I guess you are planning to go ahead even if everyone in Luton Road objects. But I feel you should know what our feelings are about this proposal.

Can I ask what will happen if the motorway is blocked where will the HGV's go then? Just park up outside our homes or park in Tesco's with motors running causing us yet more sleepless nights.

I would guess that we would not be compensated in any way such as a drop to our council tax or maybe you have some other way to compensate for more disruption we already have a 24 hour Tesco on our doorstep.

I look forward to a reply from you at your earliest convenience.

We received a letter from you concerning the introduction of a 7.5 tonnes weight restriction zone on a new boundary. This is of a great concern to us because of this boundary you propose to send all of approximately 300 HGV's past my door daily. As I'm sure you realise Luton Road is already very busy and just one small accident on the M1 causing major grid lock in Dunstable, Please let me know what you propose to do on such occasions.

We already have major noise caused by volume of traffic and the Tesco store opposite us being allowed to open 24 hours a day (which I also objected to).

I am quite certain that the discussion has already been made and this letter will have no influence on your discussion. But feel I should voice my opinion any way.

The high volume of HGV's that come down Luton Road already shake our house and cause vibration and so now we have to have more HGV's and more damage to our house and of course the added pollution we will have to breath. As I am already suffering with Multiple Myeloma (bone marrow Cancer) which studies have shown may be caused by petrol and fumes I am not amused with this proposal.

We would also be looking for a reduction on our council tax as our value of our property is sure to go down with yet more traffic passing by our door. I would also ask why the whole of Luton Road have not received a letter from you I have spoken to quite a few residents from long out road who have not received any communication from you.

I look forward to your reply and some answers to the above questions and concerns.

as a resident of luton rd dunstable for 24 years i wish to register my objections to this proposal on the following grounds;

getting in and out of our drives in a car is almost impossible as it is without another 300 lorries a day thundering past,so much so that my daughter refuses to bring my grandkids to my house because of the danger of getting on and off my drive .

this road was finally re surfaced only a few years ago, the first major work in my 24 years living here and already it is breaking up, at a conservative estimate at least 60% of the manholes and gulleys are breaking up and need relaying, including one outside my house that was reported 4 months ago and is still rattling my windows.

the noise,danger and pollution is intolerable as it is, making luton rd a rat run for h.g.v`s is a ridiculous decision surely spreading the load as widely as possible over as many roads as possible makes more sense in the long run.

after 24 years living here i will not be holding my breath waiting for the woodside connection or the a5-m1 link road to happen, we have heard all the promises before and nothing happens.

and finally what numnuts dreamt up this idea, the traffic barely flows along luton rd as it is, adding at least another 300 lorries a day will simply bring all traffic to a standstill, and when there is an incident on the m1 or the a5 this road becomes a car park anyway.

I would like to register my objections to your proposed implementation of a weight restriction on Poynters Road. I live on the Luton road and already have to tolerate, that due to there still being no ringroad, continuous flowing traffic, and if a driver in Dunstable or Luton sneezes, we then have 4 lanes of stationary gridlocked traffic. I personally have had occasion's where I could not leave my driveway for 15 minutes due to this stationary traffic. I do not think your plan of forcing every HGV wishing to access the local industrial areas, to do so only by using the Luton Road is right, even with your intended changes to the traffic signals at the junction of Luton Road/Boscombe Road. As there is only a small holding lane for vehicles wishing to turn right into the industrial areas, that junction would be in a permanent state of gridlock.

I would suggest that you wait until the Woodside Connection improvement scheme is completed and see what impact this has on traffic movements in the area, before you inflict any detrimental changes on the residents of Luton Road.

I have received your letter dated 11 October 2012 and I am most annoyed about its contents. Your plans to throw 300 extra HGVs upon Luton Road which already bears the brunt of the traffic travelling to Woodside Estate and Porz Avenue. You are putting weight restrictions on roads i.e. Poynters Road for health and safety reasons do those health and safety reasons not apply to Luton Road? At certain times of the day (school hours) there are a number of children walking and cycling to and from school what do you feel about their safety with these extra lorries you are forcing down Luton Road?

Surely it would be better if you sorted out the link road first and then proceeded to carry out your weight restrictions.

Luton Road already takes the majority of traffic if there is a problem on the motorways and I have sometimes waited up to half an hour to get out of my drive. Add to this the emergency service vehicles that also use Luton Road are you going to be responsible for them not to be able to get to an emergency because the road has become blocked with these extra vehicles.

I also feel that this letter is a bit below the belt as we only have until the 26th of October to respond. We have also spoken to many residents on the Luton Road and they feel similar to us but believe you have already made your decision and it wont be changed. We look forward to your response.

I am one of many residence who live on the Luton road and we are fuming and disgusted at your decision to send an extra 300 vehicles along the Luton road doesn't the health and safety concern the residence of Luton road ? Our safety of getting in and out of our drives ? We already pay enough in council tax what about the structural damage to our buildings ? The safety of our children and grandchildren ! And the time you have given us to reply . Guess you think you have made your mind up well think again where is the bye pass ? Then impose the weight restrictions ! We will go to the national papers 3 counties have already been informed we will fight you all the way ! Give us a break when the M1 has a problem where does it go? That's right ! The whole of Luton road are together on this ! Think again ! Look forward to your response !!!!!

I am in receipt of your Public Notice and accompanying letter. Here are my objections:

1. The reduced time to object due to the delivery of your notice being more than 2 weeks after its preparation. What was the delay? Why were we not invited to give opinion prior to the proposal being drawn up?

2. Your grounds for the proposal are flawed.

Road Safety: By diverting more HGV along Luton Road you increase by 6% the number of 7.5 tonnes lorries to a total of 750. How does this improve road safety? Consider that the A505 is pedestrianised, it has housing, local amenities and is crossed by scores of children daily enroute to their schools. It is also the meeting point for children waiting for collection by school bus to schools outside of the area. Luton Borough Council already fund crossing guards along Leagrave High Street and Dunstable Road. Where are your Road Safety conscious offers of funding for the same??

Pollution: The A505 is an already congested and heavily used route, by increasing the traffic flow on this road you will be causing further congestion and increasing pollution as vehicles are brought to a stop.

3. The blatant hidden agenda. It is obvious to me that the real motivation for this proposal is to bring Dunstable to a halt, thereby increasing the appeal of the pending tramway and obtaining the much talked of bypass.

4. Your long term improvement plan. The fact that you have already devised such plans illustrate you already know what a damaging effect your proposal will have.

5. Luton Road was once a road similar in design to Poynters Road, during it's making into a dual carriage way it was acknowledged by the council the negative effect increasing traffic flow would have on the properties and their residents. Today you feel able to disregard the effect increasing volumes of heavy traffic will have on our properties. The lorries you plan to re-route outside of these homes bring vibrations and structural consequences.

My husband has written to our local MP and we are looking forward to both your replies on this matter. I am also forwarding your notice to the local press, with only 2 weeks by way of objection I hope we can gather enough support to show you how offensive your proposal is. It also serves to highlight how one part of the town can be favoured more highly than another.

With regard to your letter dated 11th October, regarding the HGV restrictions around the Poynters Road area, for one would like to definitely object to this stupid and mindless idea. I live on the Luton Road and once every 4 minutes a bus passes my front door from early morning, till late at night, plus numerous HGV trucks, so how can you say that rerouting them would save pollution and add the safety, you are just moving it to another area, plus the fact that young children that go to the school, like "" ST Christopher's, Hadrian and Millvale, have to cross this main road twice a day, without the help of crossing patrols, which, Leagrave Road have and have had for quite a while, . I feel that we along the Luton Road, not only do we suffer the pollution and inconvenience when the motorway is blocked, due to all the traffic coming off the M1, but Sir, I feel that we are being discriminated against, why should the Leagrave and Poynters Road area be shielded against all the traffic pollution and throw it at us, this just seems to me, to be another nail in the Dunstable coffin, people I talk to do not go into Dunstable because, there is nothing there, you Sir, are just adding fuel to the fire. When I moved here 32 years ago, I knew I would encounter traffic, living on a main road, I expected that and for all these years, yet again I have lived here quite happily, but now what with these stupid and mindless ideas thought up by God knows who, for one, " if it goes through " would give anything to move out of Dunstable, along with, I think, a lot of other people, I await your response and reply with interest

I have just received by letter the public notice dated 26th September 2012 with your accompanying letter dated 11th October, regarding the proposed HGV weight restriction on Poynters Road and Leagrave High Street area. This letter arrived at my address on 13th October.

The public Notice states that the proposed order is considered necessary on the grounds of promoting road safety and improving the environment of the area.

You estimate that the number of HGVs using the A505 Luton Road would increase by approximately 300 per day, increasing to 15% of the total traffic flow. You have stated the deadline for the receipt of objections is 26th October.

I have lived here for 12 years and I can tell you that Luton Road is already regularly congested.

There are in excess of 5 schools serving the residents of this area, and from the age of 9 children independently cross this road. Others, wait in groups along the edge of this road for their school busses. This proposal only adds a further risk to the safety of these children on an already busy road.

300 extra HGV's per day will mean more pollution and noise and this will only make the environment worse for residents on Luton Road.

The reasons stated for this proposal are that the order is 'considered necessary on the grounds of promoting road safety and improving the environment in the area'.

Considering the points I have raised I would like you to now explain to me exactly how this proposal is going to promote road safety and improve the environment for the families who live on the Luton Road in Dunstable?

I also want to ask why you sent a public notice dated 26th September (which allowed one calendar month for residents to object) out on the 11th October set to arrive on 13th? This gives residents just 13 days to respond to the proposal. What if some of the residents are on holiday? Please can you explain why there was over a 2 week difference of dates between the notice and the accompanying letter?

I look forward to your response.

I am still awaiting a response from you to my questions, but before I contact the Local Government Ombudsman I am going to have one further attempt to get an answer from you directly. Also some further information has been given to me this weekend which I would like to bring to your attention.

I am not trained in legal matters, but I have taken the time this weekend to read the **Local Authorities Traffic Orders Regulations 2012**.

Under Part 2 , Procedures Before Making An Order, Section 7(1) b, it states;

Before making an order, an order making authority must consult such other persons or organisations appearing to it to be likely to be affected by the making of the order.

In view of the notice received its clear that it appears to you that residents of Luton Road will be affected by this order and qualify for consultation.

Under Publication of Proposals, Section 8(3) it states

Not later than the date on which a notice under this regulation has first been published, the order making authority must send a copy of the notice of proposals to each body or person whom it has consulted, or is proposing to consult under section 7(1), or is required to consult under any of the provisions referred to in regulation 7(2)

Again, I would like to point out to you that the date on which the notice was published was 26th September 2012. The date on which it was sent was 11th October 2012. As I understand it, what you have done in sending the notice late is contrary to the **Local Authority Traffic Regulations 2012**.

Further to this, it has also come to my attention this weekend that you have still not sent notices to everyone on Luton Road who would be affected by this order. Numbers 281, and 285 say they did not receive any letters and were not aware of any proposal. This begs the question, how many other residents on Luton Road have still been missed off? I would like you to investigate this. It is fair to say that

sending out letters to residents on a street is not a difficult task and I am finding it hard to understand why you have encountered these problems.

For reasons already stated in my last email I still believe the manner in which you have dealt with these notices is fundamentally unfair. Now it appears to me that the manner in which you have acted may also be illegal.

I accept that mistakes get made, but what I do not accept is a complete refusal to make reasonable amendments to such mistakes. As I said in my previous email, you should inform residents that they have an extension to register objections, as they cannot read minds and have no way of knowing this. You should also be specific in how much more time you are giving residents to respond. This is a reasonable request with minimal demands on you. Your failure to keep residents adequately informed is unacceptable.

I would also like to ask you if you are aware that according to DEFRA, Luton Road is registered as an AQMA. It is one of only two roads in Central Bedfordshire where PM10 and NO2 are high. The other road is the A5 which intersects Luton Road. Poynters Road is not registered as an AQMA.

An AQMA is declared when objectives which have been put in place to protect people's health and the environment cannot be achieved. In such areas the local authority must put together a plan to improve the air quality. - A local Air Quality Action Plan.

Did you look into this before you put the proposal together?

Have you considered the various distances between houses and main roads on all streets affected by this proposal?

Have you considered how your proposal is going to affect an AQMA?

I would like you to please inform me what the Local Air Quality Action Plan is for Luton Road? Especially in light of the fact that your proposal, if it gets approved, is going to make a registered AQMA worse. This is particularly relevant as one of the two reasons given for this proposal is to 'improve the environment of the area'

But more importantly, under section 7(1)b of the Local Authorities Traffic Orders Regulations 2012 ***Before making an order, an order making authority must consult such other persons or organisations appearing to it to be likely to be affected by the making of the order.***

Or 7(1)c

Such persons or organisations appearing to it to be representative of such persons; and

7(1)d

Such other persons or organisations as, having regard to the provisions of the order and its likely effect, it thinks appropriate.

Therefore, did you find it appropriate to consult the Environmental Health departments within the council with regard to pollution, or DEFRA or any other such organisation in accordance the Local Authorities Traffic Orders Regulations? And if you did, was the notice sent on time?

Please can you confirm whether or not you consulted with other departments/ organisations in relation to Luton Road being a registered AQMA.

As in my previous email, I am copying in my MP

I was shocked to hear the luton road was to be given more heavy traffic. My home was built in 1929 and definitely not to take the traffic that its having to cope with, the bricks have started to crumble with the vibration when the big trucks go by is horific, I have to stick my pictures to the walls so I dont have to straiten them daily. There has only to be an accident on the motor way or any of the roads in the area and the luton road becomes a traffic jam this can last for hours. We find it very difficult to get in and out of our driveway at the present time, we could be made prisoners if we get any more traffic, and although there is a speed limit the large trucks and vans seem unable to keep to it, they brake heading up to the cameras. the council seem to

forget there are people living on this road with children and their pets, they don't forget this when it comes to collecting our house tax, we pay the same on this road as any other in Dunstable and should expect the same respect. I don't suppose anyone cares about our health.

I've just spoken to someone who says they know; and they have told me I have nothing to worry about this will only be a problem until the new bus lane opens, please tell me this is going to take lorries to Aylesbury and Leighton Buzzard that are coming past my house, what we really need is the bypass we were promised 37 years ago when we bought our home. The new road surface that was laid the other year which we were led to believe would improve things did not help with sound or vibration in fact it's possibly worse. A lot of these big trucks hammer through at night between 4am and 10am is the worst time for big trucks hammering through we don't get a lot of sleep.

When I got your public notice I wanted to get the hell out of Dunstable... then I remembered I had a house I could not sell for enough to buy another place to live in. Please start thinking about the people who live in the Luton road... they call the car park or the lorry park or even the bypass.

I am writing to lodge my objection to the proposed traffic changes that will affect Luton Road, Dunstable, namely the increase in HGVs due to their restriction being introduced to several roads nearby.

Firstly, I do not believe that sufficient time has been given, or that the number of people who will be affected have been notified - i.e. people who live just off Luton Road - whose children and lives are certain to be affected by this, have no idea and have received no information or notice regarding these proposals.

I do not believe that these proposed changes need to be carried out at this time - as you have stated - long term, you have plans to improve the links for HGVs so that they will not be so likely to use ANY of these residential roads, so wait until then!! - Use whatever resources you have to speed up this process, and not to mess around with anything else until then, so that the least amount of aggravation and inconvenience takes place for everybody concerned. Business wise, your proposed changes now are certainly not either cost or time effective, and I believe as a taxpayer, this includes spending our money.

Luton Road is already a busy road, and having a child with asthma and a dog, any increase of any traffic unnecessarily, but especially HGVs, will be highly detrimental to the health and safety of not just my own family, but that of others as well, so I therefore, strongly object to these proposals which will increase such traffic right outside my front door, when it is clearly unnecessary to do so. I fully appreciate that the residents who want the restrictions down their roads have good reasons too, but it is highly unfair at such an unbalanced and selfish cost to others.

Please have more in mind that power and money when making your decisions, as people's every day life is of far greater value. I hope to look forward to a revised and rescheduled proposal that will benefit both residents and road users, and that you take such into significant consideration.

I wish to register my objection to the proposal due to the increase in noise levels and safety of my children walking to school along Luton Road.

I currently live at xxx Luton Road, there are several defects with manhole covers which are a noise nuisance already with current traffic levels, the council aren't able to repair them in a timely manner so how will they keep up with road repairs due to increased traffic.

Regarding the above proposal, I have no idea why you think that the proposed restrictions will actually improve traffic movement in Dunstable. I live on the Luton Road and traffic is already excessive, with horrendous traffic jams occurring regularly when there are issues on the motorway. The road, despite traffic cameras is too fast and the paths too narrow for the safety of cyclists, pedestrians and my children. We have lived here 15 years.

More heavy traffic will also cause more regular road damage than there is already. The road around drain covers and manhole covers regularly breaks down and is not fixed quick enough or well enough despite regular resident complaints. I can only guess that the proposal of restrictions have arisen from pressure from local schools (namely Barnfield) as I can see no other positive aspects. I severely object to the proposals and suggest that you come and live on Luton Road yourself to see that there is already a traffic problem that should not be made worse.

Further to my previous email, I thought that it was particularly apt that on the day of your consultation, Luton Road is congested to the point of danger. I have attached two photographs of the congestion outside my house - one of which shows an HGV doing a u-turn in the road causing problems for oncoming traffic. This is not the first lorry I have seen doing this in the last hour.

Your letter of 27th September refers. I am writing to you to express my concern at the proposal to limit heavy goods vehicles on Poynters Rd, Leagrave High St and surrounding roads, thus redirecting them along the only other route, Luton Road, Dunstable.

The letter we have received from Amey states that the expected impact is that some 300 extra lorries a day will pass along the road. The letter focuses on Woodside estate, and states the proposed junction 11a of the M1 will alleviate this. Of course, it is not only lorries accessing Woodside that use Poynters Rd. They go on to Houghton Regis, the A5, Leighton Buzzard and Milton Keynes to name but a few. Often the reason they go that way will be to avoid the extreme congestion through the centre of Dunstable.

What consideration has been given to the pollution on Luton Rd which an extra 10,000 large lorries a month will cause? Have the effects to our health been considered? Inevitably, this will also cause extra lorries to go through the centre of Dunstable as they will not all be heading to Woodside estate, thus adding to the pollution there.

What about the damage to the road surface which will be caused by the extra traffic? Already manhole covers along the road need to be replaced every couple of months due to the heavy traffic.

Whenever there is a problem on the M1, all traffic diverts off at Junction 11, and spreads along one of several routes to try to access the A5, whether heading North or South. It would ALL have to go along Luton Rd and into Dunstable if over 7.5 tonnes. This will lead to even greater gridlock, pollution etc.

There are currently frequent road closures, particularly along Church St, whilst the busway is being built. How will lorries be diverted in the event of this road being closed? Bearing in mind the flooding under the bridge by Station Road, this is going to happen whether the busway is finished or not.

Emergency services such as ambulances have to use Luton Road to access Dunstable Town Centre and all roads en route. Further congestion will also increase their response time.

Why can this proposal not be enforced AFTER junction 11a is completed?

I also fail to see how this can be a Central Bedfordshire Council proposal, since most of the roads are in Luton.

I feel very strongly that the health and wellbeing of the residents of Luton Road is being disregarded in this foolhardy plan, and that once again the residents of this part of Dunstable are being used as sacrificial lambs to appease Luton. I hereby lodge an objection.

I am a home owner on the Luton Road and am very much against the proposal of weight restriction which will lead to an increased in HGV using the Luton Road as if it isnt busy enough !! .The pollution levels will increase and already it is almost impossible to have windows open for any length of time as the dirt that settles inside (can be seen on curtains and window sill) is ridiculous , the houses are close to the road with only a narrow public footpath between the boundary and road where pedestrians especially young children are very vulnerable to heavy traffic ,and what about the children that cross the Luton Road to get to one of the 3 schools and nursery which serve the area to be affected . On a normal day the Luton road is busy with Buses every few mins,lorries , emergency services ,work traffic ,believe it or not even people going into Dunstable to shop !,thats a normal day but when there is a problem on the motorway or bad weather conditions the Luton Road becomes a horrendous .

I am fed up of hearing that the new by pass will be the answer to all of Dunsatable problems ,well as we all know that is at the expense of residents in Dunstable and I dont mean in money terms ! BUILD THE BYPASS ,let new buisness move into Dunstable then take a look at the traffic issues (would be nice to know exactly why this propasal has come about) I think the people of Dunstable have put up with enough disruption what with the new busway , lights taken down and roundabouts put in only to find that hasnt helped so lights go back up
always causing disruption ,it is no wonder people choose not to go into Dunstable THEY CANT GET THERE !!

We wish to object to the proposed introduction of a 7.5 tonnes HGV weight restriction for Poynters Road and Leagrave High St.

We understand that the reasoning behind this is complaints over the years from Poynters Road residents regarding HGVs using their road. So the solution is to increase the burden already shouldered by Luton Road residents! This is most unfair! We have put up with gradually increasing HGV traffic over the years and you want to add to it. Do we not warrant equal consideration?

How would re-routing 300 HGVs daily onto Luton Road “promote road safety”? Luton Road, although a main ‘A’ road, is largely residential, housing many families with small children. An additional 300 HGVs along this road can only increase the dangers to pedestrians. Our house already shakes when some of the bigger HGVs thunder past, but we accept this as part of living on a main ‘A’ road.

I don’t know where or when the traffic figures have been calculated, but there is already considerable HGV traffic along Luton Road. This multiplies enormously whenever there is a problem on the M1. If HGVs have no alternative to using Luton Road, i.e. Poynters Road, the congestion will be even more horrendous. Even “some adjustments to the traffic signals at the A505 Luton Road/Boscombe Road gyratory junction” which is really unsuitable for HGVs anyway, are hardly likely to alleviate the situation. There is already high traffic usage in that area with access to Sainsburys and the White Lion Retail Park.

We certainly agree to weight restrictions for Ridgeway Avenue, Woodford Road, Linden Road, Evelyn Road etc, they are far too small and totally unsuitable for HGVs, but Poynters Road and Leagrave High Street are long straight roads, perfectly capably of handling larger vehicles.

How very convenient to fail to post public notice for total chaos on Luton road, if proposed plans go ahead for ban on HGVs on Poynters road. We live on Luton road and are we aware how busy and congested it already gets, why should we have to have more traffic through Luton road just so Poynters road can have ban agreed? We on Luton road road have noticed increased HGVs coming already, how much more dangerous it will be if proposed plans go ahead. We are closer to the road anyway, we have too much noise even through the night so why should we have to be put in this situation on an already very dangerous road? Road safety will not exist, pedestrians put at greater risk, children would be especially at risk. Congestion and noise would be unbearable. Houses on Poynters road are much further set back from the traffic. Dunstable is becoming one big traffic problem, why should residents on Luton Road have to put up with more, just to pacify Poynters road residents? We pay our mortgage and council tax, are we not entitled to some consideration?

This matter has recently been brought to my attention and as a resident on the Luton Road I am totally against your proposals. Do you live on this road? I would suggest not due to the fact that you cannot realise what we already have to put up with.

The road itself is falling to pieces despite it only being resurfaced a few years ago. I currently have to live opposite a drain that has been clattering since April from 4 o'clock in the morning to midnight and sometimes later. This noise is driving all of the neighbours mad but despite regular e mails to the council we have been told that nothing will be done at this stage. When the lorries go over this drain it sounds like a train so if you put even more lorries on this route it will only make the matter worse.

A number of the drains have also collapsed and when a lorry hits one of the drains near my house the whole house shakes and all of my ornaments move. One of these days something is going to fall off and break, who is then going to pay for that.

We also have to put up with the siren noises from the ambulances that go up and down this street day and night which again can wake you up in the early hours of the morning.

The dust in the air caused by this traffic is unacceptable, my house never looks clean outside and I am constantly dusting inside. I sometimes refrain from opening the windows to stop the dust & constant noise.

We have been asking for a by-pass for years, this is the solution not shifting more HGV's onto this road. At least it is shared for now.

So please do not put more HGVs on the Luton Road.

In connection with the above suggested scheme I wish to state an objection against it.

Living on Jeans Way, I have no alternative but to use Luton Road to exit on to and from each day, several times a day on occasions.

This road is already heavily populated with traffic and on a several occasions each week long queues off traffic can be witnessed from the Sainsbury traffic lights, back as far as the Ewe and Lamb pub.

By placing a freight ban on Poynters Road, all you will be doing is moving the problem...yes Luton Road is dual carriage, but the houses are sited significantly closer to the roads than those in Poynters Road.

Concerns from other residents have also been raised as to Jeans Way simply becoming a rat run for cars to escape the long arduous queues each day by using Allenby Avenue, Dale Road to cut up and through down to Liscombe Road.

There are some 320 houses in Jeans Way..there are several side streets – over 500 homes use Jeans Way already to get to and from their business.....the impact the Luton Road would cause if all freight lorries were directed via their would significantly increase the danger for residents in these roads.

I urge you to review this and look forward to seeing feedback on the consultation and further objections.

I would like to strongly object to the plans of making poynters road a no hgv route. I have to walk along Luton road to take my son to school and feel it will add much more pollution to the area. I also live on Luton road and I want to know why we can't have a no hgv route and make the traffic go down poynters road? Why is this happening.

I wish to object the the idea of sending all the HGVs traffic along Luton Road Dunstable instead of Poynters Road. Luton Road is a very busy road already & you can't even maintain this road to a good standard. there are many man hole covers that are dipping down & rattle when cars & vans pass over them. If more lorries pass over them they may collapse altogether. Also there are a lot of school kids using this route & as the footpath is so close to the road they could be pulled into the road by the lorries back draught. It's hard enough to get on the road in the morning & if we have another 300 lorries to contend with it will make our road into a living hell. I think you should just leave the lorries to their routes that they take now.

i'd like to register my objection to the above ban, surely as the end of Poynters road is the start of woodside industrial estate this can't happen. Dunstable is dying and is gridlocked most of the time, as it is now if this ban comes into place we wont be able to move in Dunstable. Surely this can wait until the so called bypass is built with the link road to woodside. Traffic will be bad enough whilst this is being built without the added hgv's blocking up dunstable.

Please be aware that we at xxx Luton Road object to the extra HGVs that are proposed to run along Luton Road.

The main reasons for the objections are:-

The road is already congested heading into Dunstable and often at a stand-still when there are problems on the motorway.

The footpaths are already narrow and allows no safe route for cyclists other than riding on an extremely busy main road.

This is the main route used by youngsters attending any of the local upper schools.

No reference has been made for safe routes for cyclists in any of the proposed plans.

Luton Road already has a high number of accidents.

The turning into Boscombe Road is single lane this will only increase congestion.

Our house constantly vibrates when heavy goods vehicles go by.

The thought of 300 more a day is frightening.

Reasons for objecting.....

1 Road safety

Luton Road has a higher accident rate than Poynters Road, extra HGV traffic can only make it worse

2. Pedestrian Safety

Luton road's pavement's are very narrow, and are directly adjacent to the carriageway.

Poynters Road's pavements are separated from the main road by between 3 and 7 Metres of grass verge.

3. Air Quality

Luton Road is subject to an AQMA and fails pollution measurements every year.

Houses on Luton Road are much closer to the carriageway than on Poynters Road.

Pedestrians are also closer to the pollution, and there are far more pedestrians on Luton Road, especially school children who walk and cycle to Queensbury School, Priory Academy, Watling lower schools.

4. Noise

Again, Luton Road houses are much closer to the carriageway than on Poynters Road.

5. Congestion

Luton Road is congested under normal conditions, if there are any problems on the M1, Luton Road can be grinded locked for hours. Boscombe Road junctions frequently gridlocks, and the council have said they will re- phase the lights to improve this, if the ban goes ahead, but why haven't council done this already, knowing of the problems now?

One wonders if a council official has moved into Poynters Road, and passing slight traffic problem on by grossly miss guided policies, that will have a devastating outcomes affect for the people, who you intend to pass on another 300 odd HGV lorries etc, that thunder down Luton Road on a daily basis as it is, that wheels clip going up and down the curb, not a very nice feeling that tonnes of truck could topple over as your walking up and down Luton Road, and after having an ambulance involved in an accident a few yrs back, that got flipped into the air onto the roof with a casualty in the back?

Shame on you, you really do need to rethink any such ban, because Luton Road is already the busiest road in Dunstable.

I have lived on the Luton Road for now over 20 years. I have witnessed many accidents and sadly fatalities.

Everytime there is a accident closing the M1 we are stuck in our homes and worse cant get there as all the main traffic is diverted to it. You wish to add to that situation but not allowing HV+GV to use Poynters Road.

Are you STUPID or what? Walk a mile in our shoes and say yes its a good idea.

WE SAY NO

I would like to put an objection in for the plans to ban HGV's along pointer road. My nan is disabled and finds it difficult walking along the road as it is, if more large vehicles are travelling along the road she will not be able to walk along the road for fear of being blown over by the turbulence caused. This has already happened once before and a repeat would mean the surgery she has undergone already would be rendered pointless as it would more than likely be required again to correct the damage caused by fallen over.

We would respectfully request the council to reverse its decision thereby continuing the current situation

i.e. HGV routes to be shared between Luton Road and Poynters Road

The increased congestion, noise and pollution on Luton Road is not desirable or necessary

The traffic increase on Luton Road would aggravate still further the danger to pedestrians on the narrow footpaths along much of Luton Road (a problem that Poynters Road does not have!)

Please abandon this proposal!

Please accept this email as my objection to your proposal for Luton roads increase in Lorry flow.

I would please like the below points answered so I can put together a formal objection once I have all the facts.

Road Safety? The road already has a speeding issue and no crossing patrols for children paths are also closer to the main carriage way than on other routes. I would like to see your proposal to face this area of concern.

Air Quality? Luton road already fails the limits for air quality by AQMA every year again please can you let me have detailed plans on how you are dealing with this concern.

Congestion? As I am sure you are aware having done your research Luton Road adds to the heavy town traffic already an issue in Dunstable routing all traffic through the small end of a funnel will not help this situation.

I would appreciate a reply as soon as possible as I am concerned that your only solution for this problem is to route the traffic elsewhere when there is a plan for a bypass, surely the sensible option is to wait for that to be up and running and make that only for HGV use.

I look forward to your reply

I am emailing to express my concern and opposition to the Ban of HGV lorries on Pointers Road.

As a resident in the Luton Road area, I am very worried about the impact of an additional 300 HGVs a day will have on me and my children.

It's proven that Luton Road already has more pollution, accidents and indeed traffic jams than Pointers Road so I'm confused why so many extra HGVs will be forced along there.

I desperately hope that this plan will be reconsidered. It seems that the residents of Pointers Road are being listened to but not the residents of Luton Road.

I have received your letter dated 11 October 2012 and I am most annoyed about its contents. Your plans to throw 300 extra HGVs upon Luton Road which already bears the brunt of the traffic travelling to Woodside Estate and Porz Avenue. You are putting weight restrictions on

roads i.e. Poynters Road for health and safety reasons do those health and safety reasons not apply to Luton Road? At certain times of the day (school hours) there are a number of children walking and cycling to and from school what do you feel about their safety with these extra lorries you are forcing down Luton Road?

Surely it would be better if you sorted out the link road first and then proceeded to carry out your weight restrictions.

Luton Road already takes the majority of traffic if there is a problem on the motorways and I have sometimes waited up to half an hour to get out of my drive. Add to this the emergency service vehicles that also use Luton Road are you going to be responsible for them not to be able to get to an emergency because the road has become blocked with these extra vehicles.

I also feel that this letter is a bit below the belt as we only have until the 26th of October to respond. We have also spoken to many residents on the Luton Road and they feel similar to us but believe you have already made your decision and it wont be changed.

Polution in Luton Road is way above what it should be. The houses in Luton Road are closer to the road than Poynter Road thus making it more dangerous for people walking as well as the houses.

Leave things as they are until you actually do what you have been talking about for years and build the link road.

I am totally against the proposals for more lorried to go along Luton road and not Pointers Road. I have two children who have to walk along Luton road to get to school twice a day. We also live on Luton rd. The polution and danger is bad enough as it is now, but if there was even more lorries it would put my children at even more risk.

At the moment, if anything happens on the M1 the traffic on Luton Road comes to a stop. Going into town at the moment takes me 15minutes! It's only a couple of miles!

I don't believe it is a good way forward and I hope you take into account the problems we already have and think of the children who live and walk along the road.

I hope you think of the next generation when you make changes that could risk lives.

I wish to register my objection to the proposed 7.5 tonnes HGV weight restriction - Poynters Road and Leagrave High Street area, Dunstable and Luton.

I have lived on the Luton Road for 20 years so feel I am qualified to comment on the proposal. I wish to object for the following reasons:

Windows vibrate when Lorries go past.

The pavements are too narrow; this road is used by a lot of school children going to St Christopher's and Queensbury.

It is difficult enough walking on the pavement as it is because of bicycles using it as the road is too dangerous for them.

The ironwork in the road is damaged and sunk because of the weight of the Lorries that use it at the moment.

The puddles that form at the pavement side of the road means that when the Lorries go past you get soaked if you are walking.

When there is a problem on the motorway the road is completely congested with lorries, the noise and the vibration makes your ears uncomfortable due to the pressure and stops you from sleeping at night. This will be made worse if Luton Road is the only road they can use.

The junction at Sainsbury's for lorries to turn into Boscombe Road is not big enough for them to flow through smoothly it is a tight bend at most you can only get 2 lorries through before the lights change. They will have to negotiate 3 sets of lights just to turn right, this is a ridiculous situation.

I work at the Luton & Dunstable Hospital so walk to and from work every morning and evening. The fumes from the traffic gets on to your chest making you cough and leaving a nasty taste in the mouth. The government want people to take a more green approach to life but you are making it impossible.

I am writing to you to raise an objection to the proposal to increase the number of HGV that will need to access Luton Road if your plans to limit the weight of vehicles using Poynters Road are implemented.

The rationale behind my objection are as follows

1. I have a son who suffers from Cystic Fibrosis and with the increase in traffic the already poor air quality will deteriorate even further which will cause further health problems.
2. The current volume of traffic causes the house to shake and vibrate and with the proposed increase I fear for the structure of our house.
3. With all the alterations to Dunstable's already failing traffic system to actually plan a route and timing into town centre will become about as predictable as winning the lottery, this will have a massive impact to the survival of Dunstable town centre and I was always under the impression that Central Beds council was trying to save the town centre, obviously I was misled. The town centre will die.
4. The condition of Luton Road surface is appalling due to pot holes, loose manhole covers ect. The road was resurfaced approx 5 years ago and for the first year it was lovely but now it is noisier than ever due to its condition and with the increase it will only get worse.

I am sure that there a number of other reasons to object to this proposal and I can only request that you seriously reconsider these proposals for the future of an already ailing Dunstable.

Re the above proposal, I am a resident of Kingsbury Gardens in Dunstable and have strong objections to the proposal to ban HGV's from Poynters Road and to divert them down the Luton Road for the following reasons:

- 1) Firstly, the area is a residential area and an extra 300 HGV's along this stretch of road would make living along the Luton Road unbearable for those who front the road. I live in Kingsbury Gardens and often hear the lorries at night proceeding over the drain covers and cannot imagine how the residents of the Luton Road should be expected to have their sleep further disturbed.
- 2) The pavements along the Luton Road are extremely narrow and walking along them is extremely unpleasant with the current number of HGV's that proceed along it. The pavements along Poynters Road are considerably wider than those along the Luton Road. The houses along Poynters Road are much further set back from the road side than those along the Luton Road.
- 3) The side roads to the South of the Luton Road (eg Allenby Ave, Kingsbury Ave/Gardens, Dale Road etc) are primarily family homes and there are large numbers of children who have to walk along/cross the Luton Road to access the Local schools. An extra 300 HGV's will make walking to school along the Luton road both unpleasant and dangerous and will only encourage more parents to DRIVE their children to school which will add further congestion to already busy roads.

- 4) I believe that the extra number of HGV's will have to use the Boscombe Road turning alongside Sainsbury's to access the Woodside estate. Unfortunately the number of HGV's already using this turning results in the Road being regularly blocked. It is not designed for any more HGV's to turn right at this junction. Further Road congestion is inevitable if this proposal is put through.
- 5) I understand that the Luton Road is already an Air Quality Management Area due to the high level of pollution in this area. An extra 300 HGV's is going to make this even more dangerous to the residents of this area. As an asthmatic with 2 asthmatic children I would like to be informed about how this will be addressed if this ridiculous proposal goes ahead.

I believe that the reasons above clearly outline the case for NOT banning HGV's on Poynters Road.

I look forward to hearing your response.

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I believe that the reasons above clearly outline the case for NOT banning HGV's on Poynters Road.

I look forward to hearing your response.

I would like to officially Strongly oppose the plans to prevent HGV'S travelling along Poynters Rd in Dunstable/Luton.

This will increase all the traffic flow along Luton Road to Woodside Estate, an area that already is struggling with traffic.

Also Our children cross Luton Road regularly, We are already in an area of extreme pollution and how will this help with that?, also what of all the safety aspects regarding children and any pedestrian crossing Luton Road?

We can not allow Luton Road to become a thoroughfare for all HGV's, this is a residential street with families living on it and will affect not only them but all of us in the surrounding roads off of Luton Road.

Please put forward my families thoughts at any relevant meetings regarding this proposal.

This is to inform you that me and my family object to your decision on sending Extra HGVs on Luton road. We are already facing enough traffic problems on this road and the noise, dust and congestion are affecting our daily lives.

Please reply an acknowledgement for my letter.

Would you please note my objection to the proposed 7.5 tonnes HGV weight restriction for the Poynters Road and Leagrave High Street Area.

I have lived in Luton Road for nearly 40 years. You estimate an increase in HGV vehicles using Luton Road to 300 a day. The A505 Luton Road is heavily used and is at times gridlocked when there are problems on the M1 and traffic is diverted along the A505. These times bring a large number of extra HGV's on to Luton Road.

The road has been widened over the years and so properties are much closer to the traffic and I have concerns about pollution, noise levels, and effect of vibration on properties. Pavements are quite narrow and safety of pedestrians, especially children is a concern. Luton does not benefit from the grass verges in Poynters Road.

I do think that this change is ill considered.

Hi, i'd like to voice my disapproval concerning the HGV ban on poynters rd.

I live just off Luton Rd and the traffic is horrendous most days making it difficult to get into Dunstable. My son goes to Hadrian Academy and if the traffic is bad on luton rd (which is quite often) the lorries block the roads and the crossings making it very difficult to even cross at the crossings, especially with the buggy. It's not only difficult it's very dangerous. As you can imagine I'm very concerned about this getting worse!

Luton Rd already has poor air quality, does the council not have a responsibility to make this better? It's only going to get worse. There are a lot of school children that walk to school (Queensbury etc) on Luton rd. This is going to make it more dangerous for them especially as the pavements are right next to the road on luton rd. There aren't as many children crossing Poynters rd as one side is dunstable and the other is luton (Catchments etc).

Also the road that i live on is already used as a rat run with people trying to jump the traffic. I'm amazed that this is even being considered as an option to be honest! It is completely unfair to push the extra traffic on us. Are we not suffering enough already?

My family live on the Luton Road and we see the daily traffic congestion.

Emergency ambulances drive constantly along this road and if you decide to create more traffic for this road it WILL lead to fatalities. Whenever there is a problem on the Motorway it is guaranteed there will be traffic chaos on Luton Road and with nowhere else to go it will be far worse.

The Luton Road pavements are much too narrow for such a busy road and again fatalities and injuries are just waiting to happen. Some years ago a lorry went into our front wall so I know it happens and it was pure luck no one was walking along at the time.

Children of all ages and a very large number of adults have to walk alongside the traffic which is dangerous as already mentioned but also the air pollution is damaging for their health especially as so many children suffer from breathing problems.

The noise and vibration within the houses created by the HGV'S is getting very much worse and can only get more so, which could cause structural defects to the houses which in turn will create problems for the Council when residents sue them for blatant disregard for the houses and house owners [who are council tax payers] .

I would also like to make a constructive suggestion.

Do not build any more distribution warehouses in Boscombe Road or anywhere else in the centre of Dunstable and when the Junction 11A of the motorway is constructed, build all the distribution centres next to the junction. This would eliminate the need for the extra roads and disruption in and around Dunstable and the area in Boscombe Road could then become a green belt/land site, making up for the loss of a green belt/land site by the Motorway. A green park could be built in Boscombe Road, especially as there is NO decent park in Dunstable.

I do realise that this might sound unrealistic to the Council/Highways Commission, but so is the Bus link to Luton, in the view of the majority of tax payers, but it is still being built so why not try my suggestion.

A ban on HGVs using Poynters Road is of course absurd.

- Dunstable has fought long and hard for a bypass for many years which still may not happen for another 2 years so this idea totally contradicts Dunstable's aim to reduce traffic.
- Poynters Road is a main route for the purpose of transportation.
- If 1 or 2 lorries stop at the traffic lights around Sainsbury's Petrol station in order to get to Woodside Estate it would totally block access to Sainsbury's and the White Lion Retail Park.

It is a great shame that councillors do not respect the work done over many years to reduce traffic through Dunstable and regenerate the town. I urge any decision to be based on the whole picture!!!

I do have some questions, and I hope you don't mind but it would be preferable to me if I emailed them to you because it allows for better record keeping and sharing of information with other members of Luton Road.

On reading your response my first impression is that some of your points are valid, very well made and appear to support your agenda. However, you make absolutely no acknowledgement towards the negative impact these proposals have on me, my family and my neighbours. You also fail to acknowledge the current problems Luton Road residents face from heavy traffic, many different, but no less important.

The long standing aspiration that you mention (supported by a petition) from residents of Poynters Road for the implementation of a weight restriction on this route has been matched. Although Luton Road residents have not had anywhere near the same amount of time to organise opposition to such a campaign it may interest you to know that we also have put

together a petition opposing such action which currently has more signatures than the one the Poynters Road committee submitted. We even have support from some Poynters Road residents. I promise you there is just as much aspiration from Luton Road residents for CBC to not implement a ban, although to my knowledge there has been no long term campaign from Luton Road to ban the HGV's on our street and redirect them elsewhere at the expense of others. If a petition carries such weight (which it clearly does) then we have one too.

The statistics you provide involving goods vehicles (however small) still indicate that Luton Road is more dangerous, albeit one lorry. That aside, statistics I have seen regarding fatalities, major and minor injuries from *all* traffic indicate that Luton Road is a significantly more dangerous route. What are the councils statistics on all traffic accidents on both roads for minor, major and fatal?

You state officers believe there is greater potential risk to road users on Poynters Road than Luton Road, but this is not supported by any accident statistics or data. It is merely an opinion to which there is a counter argument to every single point you have mentioned. Here are the arguments from the other side which you failed to consider.

Road width: Since Luton Road was widened there are no grass verges between the pavement and the traffic. Therefore pedestrians, including children, walk directly adjacent to the carriageway. Central Bedfordshire does not fund crossing patrols on Luton Road. Luton Road is just as residential as Poynters Rd with the added footfall of people accessing Schools, shops, services and amenities. Have you measured the footfall of both Roads? Luton Road was not designed as a dual carriageway. The 1970's modification placed properties at a closer proximity to the road increasing their susceptibility to noise, pollution and vibration damage. There are risks to cyclists on both roads, a risk that will surely increase on Luton Road as the volume of traffic does. Have you measured how many cyclists use both roads? Cars are regularly parked along Luton Road which forces cyclists into narrow gaps by the path of lorries. Although I would be interested to see the statistics on cyclist accidents on both roads. Do you know what they are?

Traffic Signals: Both roads have traffic signals. There are 3 traffic signals on Luton Road. These are sainsburys, homebase and Woodford Rd, and these are in place because of the existing high flow of traffic and number of adjoining roads. Traffic can still travel just as fast down Luton Road as it can down Poynters. Both roads are 30mph speed limits.

Pedestrian Crossings: You say Poynters Rd has 4 signalised pedestrian crossings whilst Luton Road has seven, but as the carriageway on Luton Rd is significantly wider and busier these crossings are more necessary. With the volume of traffic you would not be able to safely cross without them. Further to this there are no crossing patrols on Luton Road. Leagrave Rd (one of the roads proposed for the ban) has school crossing patrols. If you thinks that crossings are the magic answer to traffic speed then why not install them on Poynters Rd? What other alternative traffic calming measures did you consider before you decided on a total ban of HGV's?

Safety Cameras: Luton road has speed safety cameras, Poynters Road does not. If Poynters Road requires speed safety cameras then they should have them. The efficacy of speed cameras has long been debated, but if you believe these help, then the installation will be a lot less than the £80,000 the HGV ban will cost.

Central Islands: Both roads have central islands, but as Luton Rd is wider and busier it is a more dangerous road to cross than Poynters Rd (a risk that will increase if the proposals are approved) so it needs wider islands.

Deterioration: Luton Road was resurfaced in 2009 and it is already breaking up. There are manholes where the structure of the inspection chambers keep deteriorating under the weight of the lorries, resulting in loud noises and clanging when traffic passes, prompting repeated complaints from residents. Residents have been complaining for years about dips in the road

caused by collapsing sewers and a problem with the rainwater gully from when Luton Road was a single carriageway. Did CBC investigate the current state of Luton Road before deciding to exacerbate the problem with further HGV's? Houses on Luton Road are susceptible to vibration damage, more so than Poynters because they are nearer to the traffic.

With regard to the environmental aspect. It has recently been brought to my attention that CBC/AMY failed to notify the public protection office of the council about the proposed HGV ban notice. In the end it was left to Luton Road residents to inform them. Of course this is totally unacceptable. The Public Protection Office is responsible for monitoring air quality, and for the plan to improve air quality in Luton Road. This makes me question why the piece of work you mention that is currently underway to determine the environmental impact, wasn't carried out before the proposal was put together. Why wasn't it? It appears, as nothing has yet been determined, that this was nothing but an after thought prompted by the questions raised from Luton Road residents.

The bullet points you raised, highlighting your officers perceived elements of risk, did not include the fact that Luton Rd is an AQMA. This is something that we know already. It is a fact, not an opinion. The work to verify this has already been done. It is listed on the DEFRA website. The fact that Luton Road is an AQMA should mean it is given the same prominence (if not more so considering the reasons for the proposal) as all the other bullet points you highlighted outlining the elements of risk, and yet you failed to mention it once. Why was this?

There are problems with traffic, and HGV's on both roads. This is something that I would like you to acknowledge. The current situation is far from ideal on both Luton Road and Poynters Road. The only real solution will be when the Woodside link Rd is built. Until this time the burden of traffic should be shared between both roads. Making one of those roads better, whilst making another road significantly worse, apart from being unfair, is a complete waste of taxpayers money. CBC are seeking permission to construct the Woodside link road during 2013. If the relief road is imminent why can't Poynters Road not endure the shared burden for a short while longer, for the benefit of not just Luton Rd, but the tax payer in general.

There appears to have been zero consideration given to the residents of Luton Road within this proposal, as well as the subsequent arguments you have given, and I would like your assurance that a more balanced approach will be implemented in the upcoming meetings. The reason for my formal complaint was that no-one was prepared to explain to me how these proposals would 'improve my environment' and 'promote road safety'. Your response confirms what I feared, in that you wish to improve someone else's environment at my expense.

Thank you for getting back to me before the deadline for objections. Please can you add the points I have raised to my formal objections to this proposal.

I understand MP Andrew Selous has already requested from you the Air Quality Improvement Plan for Luton Road, as well as the projected levels of pollution if this proposal gets approved. I look forward to reading them.

I object to the proposal to ban HGVs from Poynters Road and cause extra HGV traffic on Luton Road on the following grounds:

Pollution and Air Quality

Luton Road already has higher than permitted levels of pollution. It is an Air Quality Management Area, as defined and designated by DEFRA. The council has a legal duty to '*work towards the objective of improving air quality*' in this area.

CBC admits that '*In particular, HGVs are responsible for a large portion of these emissions*'.

Extra HGVs going through the AQMA can only make the air pollution worse, and will be contrary to the AQMA Action Plan.

Poynters Road is not part of the AQMA.

Road Safety

Luton Road already has a higher rate of accidents, (minor, serious and fatal) than Poynters Road. Although there are a greater number of signalised junctions on Luton Road, there is also a proportionately greater number of side turnings, and more shops fronting the road, and it is more dangerous for residents pulling out of their drives, as there is not a verge to wait on. Both roads have the opposing traffic flows separated by a central reservation. Luton Road may have two lanes in each direction, but this does not necessarily make the road safer, as there is extra scope for accidents due to overtaking etc. Luton Road is also a primary route for emergency services, particularly ambulances.

Pedestrian safety

Pedestrians on Poynters Road are separated from the carriageway by a wide grass verge. Pedestrians on Luton Road have no separation from the carriageway at all. There is no room for error whatsoever; if a pedestrian stumbles, they can fall directly into the road. If a HGV drives in lane 1, their mirrors can overhang the pavement. The 'suction effect' of HGVs on pedestrians on Luton Road is dangerous due to the close nature of the HGV to pedestrian. Walking on the pavement along Luton Road is already dangerous, unpleasant and unhealthy.

School routes

Many pupils walk and cycle along Luton Road (mainly between East Dunstable and Queensbury School). Pupils from the Jeans Way area and south side of Luton Road have to cross Luton Road to get to schools within their catchment area (Millvale, St Christophers, Hadrian etc). There are no crossing patrols. There are no pupils whose catchment areas mean they have to cross Poynters Road, and there is very little reason for pupils to walk along the length of Poynters Road. Again, on Luton Road, children walk within centimetres of the HGVs; on Poynters Road they are several metres away.

Noise pollution / Vibration

Luton Road houses are much closer to the road than houses on Poynters Road. Noise levels at the property are far higher on Luton Road than on Poynters Road. Due to the close proximity of HGVs to the properties, vibration can be bad. Windows and doors rattle, it is not possible to open front windows due to the noise (and due to the air pollution). It is not even possible to hold a conversation with a neighbour outside the house due to the high noise levels without having to shout.

Congestion

Luton Road is already congested. Some traffic jams can last for hours, along the entire length of the road. The road is the only way into Dunstable from East Dunstable / Luton, and should not be subjected to extra HGV traffic. CBC stated that changes would be made to the Boscombe Road traffic lights. If this is actually capable of improving traffic flow, why has it not been carried out already?

Rat Runs

It is likely that extra HGV traffic on Luton Road will lead to cars seeking alternative routes. Likely routes will be Allenby Avenue / Jeans Way / Liscombe Road, or Woodford Road / Katherine Drive. This will push more cars onto these estates, creating more problems for the residents, higher accident rate etc.

Residential Area

Luton Road is a residential area, the same as Poynters Road. The original petition from Poynters Road omitted this fact and only mentioned Boscombe Road. There are more residents living on Luton Road than on Poynters Road.

Why should the residents of Luton Road have increased suffering to please the residents of another road?

Premature proposal

This proposal should not have been considered until after the Woodside Link Road is built. The Secretary of State for Transport and HM Planning Inspectorate has stated *'Implementation of the published scheme (the M1/A5 bypass) would enable CBC to construct the WSC (Woodside Connection) and would also allow it to derunk the A5 as far as Markyate. HGVs could then be banned from Dunstable High Street and a similar ban could be imposed on Poynters Road, currently the shortest route to the Woodside Industrial Estate'*

Why, if the Secretary of State for Transport, and the Planning Inspectorate thinks the ban should be considered after the Woodside Link is built, does CBC think it is OK to do it before the Woodside Link is even at the planning stage?

Road Surface

Although Poynters Road is in need of resurfacing, Luton Road also has problems with the road surface. Luton Road has many access covers on the carriageway (this is a legacy of the road being widened in the 70's). Most of these covers have sunk (despite being repaired every few months), and are very noisy when HGVs go over them. Some are in such a bad state of repair that they are dangerous. Cracks in the tarmac are appearing.

At the time of Luton Road being resurfaced, we were told that the design of the drainage and services under the road was such that the only way to effect a proper repair would be to dig them all up and move them to under the pavement. This was not carried out, so we now have a road that is not suitable for the volume and weight of HGVs.

Estimated increase in HGV

The letter sent to residents states that there will be an increase from 9% to 15% of overall traffic on Luton Road, giving rise to an extra 300 HGVs.

This is clearly incorrect.

For this to be correct, the AADT (Annual Average Daily Traffic) for Luton Road would need to be around 5,000 vehicles.

Various documents published by CBC and the Government show the AADT on Luton Road to be more than 30,000.

Taking the figure of 30,000, and using the 9% to 15% estimated increase leads to a figure of an **extra 1,800 HGVs a day** on Luton Road.

Shared routes

It is unfair and unjust to solve the problems in one area by pushing the problem onto another area, particularly when that area is already suffering. To only have one route to an Industrial Estate (which was designed with two entrances) is a very poor idea with regards to sharing and reducing traffic flow.

Speed

Poynters Road residents complain about the speed of HGVs on their road, and point out that Luton Road has speed camera.

It is my opinion that the speed cameras on Luton Road only deter speeders for a hundred yards after the camera, then there is a period of accelerating up to the next camera, followed by heavy braking for the next camera.

However, if it is deemed that the cameras do work, then it would be more sensible to spend the money that implementing the HGV ban would cost on installing speed camera on Poynters Road. Then speed, noise, vibration, safety would all be improved for the residents.

Other

Although it is not part of this objection, I would like it put the following points on record:

The notices were sent to many residents two weeks late; and the statutory notice was placed in a newspaper that is very difficult to obtain a copy of (only available from one location in Dunstable, and then only on a Tuesday morning from a street vendor. It is not delivered, not available from a newsagent, nor is available from any other locations, nor on any other days)
This is currently being investigated by CBC customer services as an official complaint.

The CBC Public Protection Office (responsible for the AQMA) was not notified of this proposal. They only found out because the public alerted them to the proposal. At the time of writing, they still have not received the data they require to calculate the effect of the extra HGVs on the already high pollution levels. It is completely unacceptable that the office responsible for ensuring air quality is improved was not notified of a proposal that will worsen air quality.

I have requested data from CBC to allow me to check my facts, and make an informed decision, but was told that this was not available as it 'would be unfair to give this to some interested parties to inform their representation when it was not available to others, some of whom may have already submitted their views'
This attitude is not acceptable. Anyone could have requested this information before submitting their views, and the information should be made available so that people can make their views based on facts.

I have lived on Luton Road ever since 1941 and the front gardens of the houses have gradually disappeared so that now we are practically living on the highway. Poynters Road has wider pavements and grass verges yet they are complaining about the heavy lorries. The rumble of lorries brings cabinets from walls in Luton Road and the rain in the gutters when lorries go past washes the windows. Luton Road should have the restriction of lorries not Poynters Road. Luton Road is a car park if there is an accident on the motorway it will be worse still if the heavy lorries cannot go down Poynters Road as well as Luton Road it will be chaos.
The other point is that heavy lorries going around the Luton Road/Boscombe road gyratory system already block the road as Boscombe Road is an outlet only onto the Luton Road and if there are 2 large lorries as the traffic lights to turn right there is not room for cars so the queue will stretch back to the Homebase traffic lights if all lorries for the Woodside estate come that way.
Improvements!!! someone in planning needs their head examined. This is absurd.

I wish to object strongly to your proposal to subject even further the misery now being suffered by Luton Rd and side road residents.
I have walked to the Dunstable shopping centre on many occasions in the past but sadly my family and I can no longer gamble as to whether we will make it in one piece or not also the pollution from vehicle exhausts is suffocating. Allowing more H.G.V.s along Luton Rd. would be madness and our health and well being will surely suffer

I refer to your recent notice regarding the above, having received an anonymous 'heads up' a few days earlier, no doubt from another of the residents who had become aware of the limited distribution of your original notice.

As a resident of Luton Road I must protest in the strongest possible terms to your proposals.

When I moved in to Luton Road I was of course conscious of the negative features of the Luton Road traffic but I was encouraged by talk of a by-pass to be in place within 10 years.

Some 18 years on, there is still no By-Pass and the traffic has got even worse. The 'powers that be' seem intent on packing as many new build houses into the Town as possible on every piece of land that is available or able to be made available. We have seen costly traffic schemes introduced and then swiftly aborted in the face of abject failure and the construction of a new distribution depot in the heart of an essentially small but residential town with no provisions for a link road to the major routes -unbelievable.

The Luton Road in particular has become almost intolerable, with cars and lorries, of ever increasing size, thundering down at all hours of the day and night. The road was only resurfaced some 3 years or so ago and is already in an appalling state of repair with drain covers clattering like railway tracks every time a vehicle passes and pot holes causing lorries to shake the foundations of nearby properties every time they pass. The constant ambulance sirens add an extra degree of discomfort to the ears but these of course are in the main, necessary - apart of course from those who for comic effect, sound them early on a Sunday morning when there are no other cars on the road. In any event, it is a further factor which should be taken into account when considering the use of and nuisance created by this road.

The quality of the air, and thus the effect on health, is also a major concern with visible evidence in the black dust that constantly settles on the outer window ledges of the house and pervades the home when, through necessity, we venture to open a window. For my part I am effectively prevented from opening my front windows due to the noise and the dirt.

There is also a safety issue with many residents and children walking along the road to access small shops, food & Drink outlets, Tesco's and the small Methodist Church.

Frankly, the quality of life in terms of noise pollution, air pollution and general mayhem along this road is unacceptable and is set worsen with your proposals to divert a further 300 lorries per day along this route.

There is already a negative effect on house prices as a result of the road and one can only reason that this will be increased as a result of even more traffic. Are we to be compensated for this? Furthermore, as tax paying residents of what is essentially a residential road, I think it is appalling how little thought and consideration is afforded us. Whilst we would not wish these vehicles on the Poynters Road residents, they are at least at present sharing the burden and their houses are after all, set further back.

Frankly all of these negative effects are caused and worsened as a direct result of the actions of those in charge of roads and traffic management in Dunstable, and I think it is high time we received some compensation for the position as it is, let alone for any further detrimental actions. I am aware that residents along the M1 have received financial compensation following the recent works around J11 and this despite them living hundreds of yards away and having 10ft high fences along the carriageway. Whilst this would in no way alleviate our dissatisfaction with the position overall, and we certainly wouldn't wish it in preference to improvement, but one has to wonder why we are not afforded the same degree of consideration as those distant neighbours to the M1, perhaps to the extent of covering the cost of good quality all round double glazing?

A bit of a rant, but it does reflect the depth of my feeling and so I implore you to not only cancel your plans to increase the Heavy Good Vehicle traffic along Luton Road but also to turn your attention to improving the position through lasting repairs to the numerous drains and pot holes and measures to reduce and quieten the traffic passing along the road.

I was very distressed to read the proposal to ban 7.5t lorries from Poynters Rd and direct them all down Luton Road instead. I can think of countless reasons that this is a bad idea.

As it is, Luton Road regularly blocks with traffic; on an ordinary day you cannot travel along the road with meeting a jam between 16:30 - 19:00. Add to this an extra alleged 300 vehicles (I believe the actual extra amount will be much higher and that 300 is wildly underestimated) and you have a recipe for traffic disaster.

Another objection would be that the pavements on Luton Rd are much closer, i.e. right next to, the road. Poynters Road has a grass verge separating the road and the pavement along the whole length. School children of all ages use Luton Road and this would prove much more dangerous with all the extra freight, and associated pollution.

As a home owner on Luton Road, I am, of course, concerned about the extra pollution, noise, and general dirt that will be generated by this proposal. It is difficult to have windows

open with the current level of noise and fumes, at least on Poynters Rd the houses are set back from the carriageway and would be less affected. I grew up living on Poynters Road so I am well aware it is much less noisy than our house on Luton Road.

In summary, I cannot think of one single reason why the traffic should be diverted down Luton Road instead of Poynters Road. If changes need to be made, why not divert it down Poynters Rd which is more suitable in every way? I strenuously object this proposal.

As you can see by our address we have along the Luton road when we moved here in the seventies we had a nice wide grass ~~down~~ verge and a run in to the pavement enough to park the car for a while and the road was NOT so congested as it is now, and cars (not now as we are too old for a car) have to pull up half or nearly completely on the pavement, where to folk with kiddies in prams or walking along side have a job to pass also theres lots of groups of children walking to their schools, with dads on bikes (no bells forcing their way through), all in close proximity to cars and increasing larger lorries coming along at a fair rate. Then you get

an accident on the M1 with still more and larger lorries some double length all on this road with now no verge and almost on top of pedestrians.

Whilst Poynters road has a good verge and leads to a big round-a-bout right against the big factories and stores where the lorry traffic needs to get

In bed at night the house sometimes vibrates as they go by

Please excuse the writing but at 65 $\frac{1}{2}$ my hands are not so steady and another (at least 300 large vehicles ^{pass} by here daily wont improve that)

Sorry but I thought some one had to say something, thats 300 ~~road~~ on top of what we have to put up with now

With reference to your proposals of banning HGV's from Poynters Road, this will shift and increase the HGV volume to Luton Road.

I have studied your scheme with interest and therefore I strongly object to the council's proposals.

This will also increase the noise levels and affect the already bad air quality! Not to mention safety and congestion.

Dear Sir / Madam

Let me first ask you, what council member or relative these of Luton Road would you come up with this idea of making Luton Road more dangerous!

Luton Road is not a dual-carriageway it is only a 30 mph limit, it is already treated by many as a race track, once they have passed the speed cameras just passed 'Tesco's', by time they get to my house many are doing 50 mph and it is already difficult to join the traffic or cross to the other lanes!

More HGV's mean more danger! My car parked on my driveway was in collision with a car that had been hit by a Polish lorry driver on the 19/5/11 (Police report URN 117). This actually caused my car to damage my house and if this idea comes into being there will undoubtedly be more crashes on this road and more danger to life, particularly for the residents who already have a very small pavement protecting us from more and more lorries.

Noise is also a factor, pollution and upkeep of the

Road. At the moment, drain covers and ironworks are not a priority as for months the drain cover outside No 278 clangs everytime a vehicle goes over it, and there are others further up the road.

Paylers Rd has much larger pavements, therefore the risk to residents is less. Please take into consideration the safety of Luton Rd residents

Please accept this as my objection to the above order. I am a resident of Luton road and therefore directly affected.

We already have adult cyclists using the pavement at anything upto and in excess of twenty miles per hour. We have many children using the east end of Luton road to get to and from school. Now somebody thinks it would be good to send another thirteen HGV per hour down the road.

What about risk to pedestrians, what about disturbances to residents, especially at night with disturbances to sleep. What about when the M1 has one of its many and usual closures.

What about extra damage to fitting and footings of premises/building with extra weight pounding the road "twenty for seven". In this day and age as much dispersal of traffic is the order, not creation of bottlenecks and potential dangers.

There will be permanent traffic jams at

Sainsburys/bottom of Boscombe road, which will extremely regularly be tailed back to the M1. I would have thought the recent problems you have caused in Sunstable Kingsway/Covert drive would have given you a few clues to put brain in gear before acting.

Attach a separate sheet if necessary:

WHY ARE YOU PROPOSING
TO INCREASE THE
AIR POLLUTION ON
OUR RESIDENTIAL ROAD
WHEN YOU ACTUALLY
SHOULD BE REDUCING
IT, AS IT HAS AN
AQMA. 300 EXTRA
HGV'S IS NOT ACCEPTABLE

What would you like to see happen?

~~CBC~~ I WANT TO
KNOW WHO I CAN REPORT
YOU TO FOR THIS.

I am writing to protest about the banning of 7.5 tonne HGV vehicles down Poynters Road and making them travel past my house to their destination.

In your public notice you state that it is to promote safety and improving the environment of the area. You do not state the reasons why they need improving just the fact that you are going to move the issues to Luton Road.

We already have enough traffic travelling along our road causing major congestion when the M1 has problems or the weather conditions are bad. HGV's can't get up the incline from my house to Dale Road when there is snow on the ground. Over the years I have seen them blocking the road.

On safety issues many children have to use Luton Road to cross or travel along to get to their schools with the increase of traffic you are projecting this is a major concern to these children's parents. Not long ago an articulated lorry side swiped a car outside my house. The car was spun round and smashed into a vehicle parked on my next door neighbour's front garden causing serious damage, what if it had been a person that the car had hit. I believe Luton Road already

has a higher accident rate than Poynters Road this proposal would make it worse.

The air quality of Luton Road is already subject to an AQMA. This is going to deteriorate that quality even more. I assume that the air quality of Poynters Road is worse, that is why you have put this proposal forward.

There is quite a lot of noise produced from traffic along Luton Road this we have to tolerate but it is bound to increase with this proposal. There is a manhole cover outside 278, in the road that makes a hell of a noise when any vehicle passes over it. It is that loud that people cannot sleep at night. With these extra vehicles going over it, I cannot see it lasting long. I would think there is road hardware and the road surface itself that will deteriorate because of the extra HGV traffic.

Houses are quite difficult to sell because they are on such a busy major road. This proposal will make it even more difficult and I would think affect the house valuations in a negative way.

APPENDIX F

Petition Supporting Proposal

Proposed 7.5 tonnes HGV Weight Restriction – ~~Poynters Road~~ and Leagrave High Street area, Dunstable and Luton.

Pursuant to the Public Notice, from Central Bedfordshire Council, dated 26 September 2012, we are enclosing a copy of a petition in support of the Council's proposed 7.5 tonnes HGV Weight Restriction for Poynters Road, Leagrave High Street and the designated surrounding side street areas of Dunstable and Luton.

The petition has been signed by councillors Hazel Simmons, Tom Shaw, Joan Bailey and Aslam Khan. The petition has 607 signatures.

The petition has been signed, predominantly, by residents of Poynters Road, but has also been signed by residents of Wilbury Drive, Hadrian Avenue, Katherine Drive, Markham Crescent, Leagrave High Street and Emerald Road. Some signatories, although not resident in Poynters Road, for example, need to use the road often to visit elderly and disabled relations. These have signed the petition because they find the HGVs are creating difficulties when accessing and leaving the properties of their loved ones.

We, the undersigned, petition in support of Central Bedfordshire Council's proposal to implement a 7.5 tonnes HGV Weight Restriction along Poynters Road and designated surrounding side street areas in Dunstable and Luton. Signatures collected between 1 and 21 October 2012.

Individual Supporting Representations

I am strongly in favour of the long overdue HGV restrictions in Poynters road.
HGV drivers use Poynters road as a high speed rat run saving only seconds compared to the primary route. As recommended by Super Drug to their driver.
This is totally ignored, Why risk cameras when you can go as fast as you like in Poynters road.
4 AM Sunday night/ Monday morning is one of the worst times.
Out of peak times are the worst for noise and speeding HGV's.
My sleep is disturbed most nights, The house shakes.
You take your life in your hands pulling off your drive.
Luton road is a main A road with cameras and more suitable for HGV's (one time suitable for 40 MPH as I remember)
HGV's tend to obey the 30 MPH speed limit along Luton road.
How long did it take to wreck the re surface done a couple of years back.
The new repairs will not survive the winter.
I drive HGV's This would not be acceptable in London so why hear.
This is not "Not In My Back Yard" you only have to look at the two roads. Luton road is wide and the main road Poynters road is NOT wide enough for this type of traffic.

Please find enclosed two pictures of the damage being done to xxx Poynters Road, Luton, Bedfordshire. LU4 0LD.

When the lorries get to the crest of the hill coming from Woodside Industrial Park, they change gear which shakes the whole house. The whole house vibrates.

We came down one morning to find the sink in the bathroom had cracked pretty much all over...it is cracked inside too.
The bay windows, they are just a nightmare to keep patched.

We've been campaigning for years to get the lorries stopped, do you think for a change you could possibly heed what your constituents are saying to you?

I live at xxx Poynters Road and I agree with the proposed 7.5t limit on this road and surrounding Roads, Poynters Road was never designed for the ever increasing amount of heavy commercial traffic it was always classified as a secondary Road. Whereas Luton Road (the 505) being a dual carriage trunk Road. Our lives have become intolerable with the noise and pollution on this road so hopefully the sooner the better for this restriction to happen,

We should like to confirm our agreement with the proposal of the Council for a 7.5 T weight limit for Poynters Road. The increase in heavy vehicle use of this road both day & night has reached unacceptable levels particularly for a road which obviously was not designed for use as a trunk road.
We trust you will take our views into consideration.

I purchased my property last year November so have had the pleasure of living in Poynters Road for 1 year now. I realised that I was buying a property on a busy road, and this was not an issue, however what I didn't realise was how many noisy trucks would be travelling on this road, not only are they massive and noisy but some of them far exceed 30 miles an hour!

I can only hope and pray that we are successful in getting the 7T restriction for our road and once that is done perhaps our roads can be upgraded, less potholes and damages, as well as some check done on the speeds people are doing along our road.

Our address is xxx Poynters Road, we fully support the 7.5t weight limit that is now proposed.

Unfortunately we have had to put up with noise day and night, the Road surface itself has now has sunk due to the weight of the vehicles, leading to more noise pollution, leading to lack of sleep. Dirt and dust that enters the home is unbelievable due to the pollution. To say we have had enough, is not strong or verbal enough.

Poynters Road was never to be used as a freight route. This is why the A505 was widened to allow traffic to access the industrial estate when it was originally built. With speed cameras all traffic is calmed so speeding is minimal.

Poynters Road is, or never was, an A type Road, B type Road, or even the old fashioned C type Road. It was a Lane until 1946 when it was upgraded to a Road.

Councillors freely admit we were "dumped on" when Hatters way opened, and the rest of the Northern by-pass was dropped. This led to a major increase in traffic over night.

With a 7.5t limit, and the proposed Woodside Link, we would expect that the levels of traffic would be reduced, and could also expect a reasonable quality of life.

I am a long term resident of poynters road who has campaigned at length regarding the effects of HGV traffic along what was envisaged a residential road. The short and long term effects on people and the enviroment along this road are effident. The noise and air pollution from the Lorries that constantly use poynters road as a main access to the industrial site and Dunstable town is ever increasing and unless this is rectified the health of its residents will Detroiter. The constant vibration from the weight of the Lorries is persistent which coincides with the determal effect on the very fabric houses. Replacement of double glazzing, door frames, fascia are just the few costs that have occurred indirectly dues to the type of traffic along this road. An increase in asthma, copd and various other health complaints can be contributed to the level of pollution created by the sheer volume of Lorries that access poynters road. The very fabric of the road has been destroyed by the weight of the HGV traffic that access poynters road and despite attempts by local council to partially rectify that is only a short term solution. I believe that a "lorry free life in poynters road" is the only solution.

I am emailing you with reference to Lorries free Poynters Road I have lived here for 45 years and brought Two Children.

It would give me much relief and a lot happier if this is enforced. Lorries that travel this way are often very heavy and tall and thunder down the road.

Which has caused me to slept in the back bedroom. Please make Poynters Road LORRY FREE....

In response to recent discussions and protests regarding the above. I write to confirm my concerns about the amount of heavy lorry traffic on Poynters Road.

I have lived here on Poynters Road for many years and have seen a significant increase in the amount of traffic especially heavy trucks and lorries.

I feel the road has become very dangerous and most vehicles do not adhere to speed limits.

Myself and many of my neighbours are elderly and feel the road has also become more dangerous for crossing even though there are light operated crossings in place.

I therefore lodge my request for a lorry free life on Poynters Road.

Appendix G

Results of Air Quality Monitoring Luton Road for 2011

There are three NO₂ diffusion tube monitoring sites along Luton Road, the results of one show an exceedence of the objective level (after the application of bias adjustment and distance correction factors). See the monitoring results below. The objective level for nitrogen dioxide is 40µg/m³.

Site Id	Location	Annual mean concentration (µg/m ³) 2011		Distance corrected (µg/m ³) 2011	
		National bias adj = 0.89	Local bias adj = 0.91	National bias adjusted data	Local bias adjusted data
27	89 Luton Rd, Dunstable	31.98	32.69	30.0	30.6
36	247 Luton Rd, Dunstable	37.41	38.25	35.0	35.7
37	32 Luton Rd, Dunstable	42.97	49.93	36.8	41.7

Traffic figures have been obtained from the Highways Department and were used to calculate the effects of the proposed scheme. The Design Manual for Roads and Bridges (DMRB) model was used, it predicted an increase of 1.1µg/m³ with the potential extra traffic flow when compared to current levels, but that the objective level would be met. However the DMRB is an indicative tool and can over/under predict the impact on air quality.

The table below shows the projected unadjusted measured annual mean NO₂ concentrations - calculated in accordance with Defra guidance. However the tubes are subject to bias and distance adjustment which differs from year to year, so I cannot apply these 2011 factors to future years. Hence I have based predictions on unadjusted results and an "as is" situation i.e. no increase in traffic and no bias/distance adjustment factors applied Predicted figures based on additional HGV's

If the 1.1 µg/m³ figure is added to the unadjusted predicted figures it would give results , showing a continued breach of the objective :

2011				
	annual ave	2013 predicted	2014 predicted	2015 predicted
32 Luton Road, Dunstable	49.38	45.2	43.1	41.1
Luton Rd o/s 89, D'ble	37.03	31.2	32.4	30.8
247 Luton Road, Dunstable	43.12	39.5	37.7	34.9

The annual decrease in air pollution can be explained thus:

Defra advises that background pollutant concentrations are expected to decline in future years as a result of Government and EU policies and legislation to reduce pollutant emissions. This will also impact on local sources of pollutants for example legislation tightening emissions from vehicles but this might be negated somewhat by the increase in volume of traffic.

Overall locally measured NO2 pollution levels have decreased year on year.