

Wynns response to the Department for Transport's Transport assessment guidelines consultation

Introduction & Background

Wynns Ltd are the UK's leading independent transport consultancy specialising in the movement of abnormal indivisible loads. In 1998 and working on behalf of Powergen, Wynns engineered the delivery of 7 loads in excess of 150 tonnes to Cottam Power Station in Nottinghamshire. The loads were delivered directly to site via the River Trent.

In November 2000 Wynns subsidiary company Robert Wynn & Sons Ltd was awarded an £8.5m freight facilities grant. The grant represented 99% of the total cost of the design and build of a specialist ro/ro barge and the purchase and conversion of a former inland tanker barge. The vessels, later named the Terra Marique and the Inland Navigator, work as a system to maximise the potential of the inland waterway network for the carriage of the largest and heaviest abnormal indivisible loads. Specifically, Special Order & VR1 categories which are granted for road movement by the Secretary Of State for Transport

The Government's "water preferred policy" was announced on June 11th 2002 by the then Parliamentary Under Secretary for Transport David Jamieson MP and clearly states that

"the Departments VSE Division will henceforth adopt a policy whereby water transportation is the preferred mode for the movement of the largest and heaviest abnormal indivisible loads. Road movements will only be authorised where the Department has considered the possibility but believes water transportation is not feasible"

In 2003 the Highways Agency became responsible for the implementation and management of the government's policies concerning the movement of the largest and heaviest abnormal indivisible loads. Previously this had been the responsibility of the VSE section of the Department for Transport.

On behalf of the Secretary of State for Transport, Highways Agency officials manage the application process for Special Order permits (for loads which when transported are either in excess of 150 tonnes in weight, 6 metres in width or 30 metres in length) and VR1 permits which are for loads which when transported are above 5 metres in width.

The Highways Agency is also responsible for the implementation of the Government's "water preferred policy"

In response to the consultation document

For a number of years now Wynns and others have been seeking to ensure that abnormal load movements are considered at the planning stage of a new build project. Far too often we have seen that special order category abnormal loads are not considered prior to the construction phase of a project.

In March 2001 PPG 13 was revised and one of the changes made was the replacement of traffic impact assessments with transport assessments. We were informed, by the DETR as was, that accompanying guidance would be produced detailing the issues that should be considered as part of a transport assessment.

We hoped that this would be an opportunity to highlight that abnormal load transportation should be considered prior to planning permission being granted.

it should be noted that at this time we were solely considering the movement of Special Order category loads by road.

Wynns made contact with the Steer Davis Gleave (STG), consultants who were drafting "Transport Assessment for Development Proposals, A Good Practice Guide" and entered in to a dialogue, which resulted in the inclusion of consideration of abnormal loads within the draft Transport Assessment guidance. This would only be for those developments that required the delivery of loads which when transported would require a Special Order. The draft guidelines are attached.

In 2001 Wynns approached Oxford Brookes University's, School of Planning to canvass their thinking as leading experts in the field of environmental impact assessment. It was their belief that the movement of abnormal loads should be considered within the EIA process. However due to a lack of academic work in this area they were not surprised that many developments were given approval without thought to abnormal load movements.

In attempt to address this issue Wynns and Oxford Brookes sought funding for a PhD student to study the impacts caused by abnormal load movement and appraise them in the context of the EIA process. Funding was secured from the Economic and Social Research Council and the study commenced in 2002.

The study, published earlier this year, concentrates on the "concept of significance" within EIA's. This was due to the fact that EIA guidance and thinking is very much based on consideration of significant impacts.

The thesis clearly sets out the impacts generated by an abnormal load movement and assesses their significance against academic interpretations of what is significant. The conclusion is catagoric, clearly stating that the "EIA process provides the perfect framework for inclusion of abnormal indivisible transportation".

We believe it is also useful to note that if abnormal load movements are picked up within the Transport Assessment then local authorities will have the opportunity through the planning system to request if appropriate that the developer contributes to the upgrading of infrastructure along the proposed transport route.

To conclude

The Transport assessment guidelines seem the most appropriate place to include a recommendation that developers consider the impacts associated with abnormal load transportation within their EIA.

It is our belief and we believe the view of the Department's consultants (STG) in 2001 that it is necessary to specifically identify abnormal loads within this guidance. We would be happy to work with the department to create the appropriate form of words