

Sir(s),

My name is Andrew Webber and I am a resident of Wolverley, having resided and raised my children here since 1999.

I am pleased to have the opportunity to present my very real concerns to this public inquiry, having expressed similar concerns in person at the first inquiry.

Before I give my evidence, it is important to clarify that I give this to you today as a concerned local resident. My evidence will rely on my experience and qualifications as a serving Police Sergeant in West Midlands Police, where I have spent the majority of my 29-year career specialising in the investigation of road traffic collisions.

My opinions and evidence are my own and do not represent the views of West Midlands Police or Policing UK.

I feel it's important to give the enquiry some greater detail on my relevant qualifications and experience to enable whatever level of gravitas the inquiry wishes to place on my concerns.

I joined the police service in March of 1995 and as such have been attending and dealing with road traffic collisions of various degrees of severity for the best part of three decades.

I became an advanced grade police driver in 1999 and joined the traffic department later the same year. This decision to specialise in traffic meant that I was responsible for investigating and handling the more serious, potentially fatal and fatal collisions; having previously only attended and handled minor injury and damage only collisions. As such road safety is very important to me. My role required me to become qualified in many aspects of road death investigation and as such I acquired an advanced qualification in vehicle examination, to assist with post collision investigations.

I am trained and have subsequently been extensively deployed as a Family Liaison Officer, whose primary responsibility was to recently bereaved families, assisting them through the road death investigation process from initial collision to the end of all investigation proceedings.

In 2001 I started my journey to become a qualified Forensic Collision Investigation officer. I achieved a City and Guilds qualification in this field. This qualification enabled me to attend fatal collision scenes and, in basic terms, 'reconstruct' them to find causes for these collisions and answers for the affected families. This has provided me with a vast array of knowledge as to the root causes and risks associated with collisions. It has also allowed me to give evidence as an 'expert witness' at many courts including magistrates, crown and coroners. For clarity, I am not asking this inquiry to consider me in the same light as I no longer perform these roles on a day- to-day basis, having moved in other specialist roles.

To that end I estimate that during my police career I have attended the scene of several thousand road traffic collisions. I have attended and managed, in one form

or another approximately a thousand Killed or Seriously Injured collision's (KSI's), including attending several hundred fatal collision scenes.

For relevance to this inquiry, and to my main concerns regarding the transportation plan, I have attended and investigated a significant number of fatal collisions involving HGV's including 3 and 4 axle load carrying vehicles, similar to those proposed for use in this application. These have included HGV v HGV, HGV v car, HGV v Motorcycle, HGV v pedal cyclists and HGV v pedestrians. I have seen first-hand the devastating effect that 30 Tonne HGV's can have on the most vulnerable road users.

Seeing and handling these incidents over several years has caused me significant mental trauma and distress, so much so that I nearly didn't have the strength to prepare this evidence and attend to give it. I have prepared it and am here presenting it because I couldn't live with myself if I didn't do everything in my power to highlight my objective and very real concerns and later the worst of my fears comes to pass with the loss of a member of our community.

### **Vulnerable Road Users.**

The UK government recognised that the most vulnerable road users (pedestrians, cycle users and horse riders) were overrepresented in terms of road deaths compared to their percentage of road use. This led to a change of legislation and a new version of The Highway Code in January 2022, reflecting changes to promote their safety. These changes were widely supported under consultation and as such represent the view of the population as well as the government.

A worrying statistic I learned from my fatal investigations was that although the motorcycling community represent only 1% of the travelling public, they represent over 20% of those fatally injured. That means that motorcyclists are over 20 times more likely to die whilst using the roads, a fact that becomes very important later in my evidence and ties directly into Jeremy Hurlstone's first report, his second report (October 2024) and his letter of response to my concerns raised during the first enquiry (JPH-B). This is particularly relevant to any local person and is in fact borne out in detail by the updated traffic survey.

Mr Hurlstone has included a two-page letter attempting to address my road traffic concerns (JPH-B). I will use this as a platform to respond as it highlights some of the relevant areas of concern.

Firstly, I thank him for providing the omitted data from the traffic surveys in his original report (Technical Appendices ES Volume 2- F Transport, Movement and Access.) I am somewhat concerned, that it took me to highlight these omissions, at public inquiry stage and that these omissions weren't picked up and at least

considered when the objection surrounding the impact of transportation was removed.

The inquiry might recall that one of my largest concerns raised during my evidence was the apparent lack of consideration of the impact of the HGV movements on those vulnerable road users. This concern comes in many strands.

### **Survey Data**

The first area I highlighted was that the decision regarding transportation and safety risks was based on survey data all conducted during the winter months (with the exception of a one-day manual observation in June 2018). I questioned how valid this data was as it is a well-known fact that footfall, pedal cycle and motorcycle use all increase dramatically during the summer months. To that end I am pleased to see a more appropriate week-long survey was conducted in June 2024 to which Mr Hurlstone refers in his most recent report. This survey more than corroborates my concerns that the decision not to object on transportation grounds was made on incomplete and flawed data. In his letter dated 10<sup>th</sup> March 2023 he compared the data from Jan 2019 to 5<sup>th</sup> June 2018 showing an increase from 13 to 94 motorcycle movements, a significant increase of 720%. More telling is the motorcycle data from the most recent survey conducted in June 2024. In paragraph 4.2 he states 'The variations in the results show some increases and some decreases in terms of volumes of traffic and speeds. However, none of the changes recorded are of sufficient magnitude to change the conclusions previously reached....' The most recent traffic data shows that on the 9<sup>th</sup> June there was a total of 247 motorcycle movements along Wolverley road (109 Westbound and 138 eastbound). An increase from 13 to 247, or 1900% increase in the most vulnerable road users should clearly be regarded as significant in any walk of life. This data does not record pedal cycle and pedestrian movements, but these do also increase significantly in line with the improved weather in the summer months.

### **HGV's exiting right from site.**

I also raised concerns regarding HGV's being physically able to turn right out of the proposed entrance and travel through the village. Reassurances were given about exit design and backed up by CCTV, policies, and sanctions. Sadly, if its physically possible, by way of turning in the road, then it can and will happen. I have seen this first hand when dealing with a fatal accident in Sandwell Council depot in 2007 where despite policies and one way signage and staff sanctions for health and safety breaches, when I reviewed the CCTV, I discovered that the one-way system was breached all day, every day by multiple members of staff. This is human factors, humans can and will find the path of least resistance to get the job done. Work as imagined (signage/one way system) vs Work as done (the way it's actually undertaken by way of turn in the road)

### **Increased risks associated if the Quarry was allowed.**

Most of the documentation I have read regarding the transport impacts are about impact on traffic numbers, impact on road maintenance and very little on road safety. Yet the report contains a rearward view of looking at historical collision data without an evidenced based assessment of future collision risks.

Having read the transport plan I have not seen anything within it that discusses the increased risks associated with the excess mud and material that inevitably gets carried out by the HGV's as they leave the site. You only have to drive past any quarry, large construction site, land fill, or anywhere where HGV's drive on muddy sites and tracks to see how much of that mud is carried out by the large tyres. This mud is deposited onto the road surface, more so within the first few hundred metres of the site entrance. Whilst much of this additional mud is then cleared up by road sweepers as contracted by the site, this is never 100% cleaned up and the mere process of cleaning the road surface with sweeper's (and cleaning the vehicles before they leave the site) leaves the road surfaces wet and slippery.

To evidence this here are three photographs I took on a dry autumn day, 3 days ago, at a local, medium sized Construction site at Habberley lane which most of the audience will be aware of. I can present these to the enquiry as AJW-1/2&3. This new housing development has on-site cleaning facilities for exiting HGV's as well as an on-site road sweeper to clean the road outside the site.

Picture 1 shows wet mud at the main site exit, facing east towards Wolverley, Picture 2 is an expanded view of the first showing the wet and muddy road surface extending a significant distance down the road. The final picture is taken facing back towards the site and shows how far the wet road surface extends and how a road sweeper can leave a formerly dry road surface now wet and slippery.

This site and construction traffic is temporary as opposed to the decade long proposal, has significantly less HGV movements than the quarry proposal and has vehicle cleaning mitigation in place and yet still the road surface suffers a significant change in condition in terms of grip available to vehicles, something I will expand on shortly.

Mud and wet road surfaces are two of the most common phenomena which impact the coefficient of friction of a road surface. Anything which negatively effects a road surface's friction increases the stopping distances of vehicles.

My teams have included Police motorcyclists in many areas including routine traffic patrols, working alongside motorcycle escort teams as a VIP trained driver and more recently my team of police motorcycle instructors. Although I am not a trained motorcyclist, I am aware that they are especially vulnerable to adverse riding conditions. This includes keeping a careful watch for diesel spills which can occur more regularly where there is HGV movement. They are also more susceptible to mud on the roads, especially under braking, or accelerating. The most recent data of motorcycle use combined with the prospect of wet and muddy road surface on a downhill road approaching traffic lights should concern all those using the road,

especially two-wheel road users.

Another significant factor which increases the stopping distances of vehicles is the sheer size. A 30 tonne HGV has a greater stopping distance than a family car, as much as 50% more when fully laden. As all exiting HGVs are expected to be fully laden, this is an important factor.

Finally another significant factor for increasing stopping distances is the gradient of the road surface. An incline will utilise the force of gravity to shorten the stopping distance. The proposals suggest that all the vehicles leaving the site turn left and drive down a significant decline towards the A449 traffic lights. I don't have the ability to measure the extent of the decline, but page 45 of the first transportation document suggests that there is a 20-metre elevation drop from the proposed exit to the A449 traffic lights, only 2-300 metres from the proposed exits. This is a significant hill with substantial impact on stopping distances, especially when considering at the bottom of the hill is set of traffic lights which will mean motorists having to brake to a halt when the lights change to red.

My fear is that the proposed plan will mean in excess of 60 lorries leaving the site a day, depositing wet, muddy water from cleaning onto a significant descent leading to a set of traffic lights. Despite any cleaning regimes put in place, HGV's leaving that site will still have a substantial amount of mud lodged in their tyres which will reduce their ability to brake, just as they drive down a significant descent into the rear of braking traffic.

Not only does the deposit of mud and a wet road surface on this descent create the potential for reduced braking abilities of fully laden HGV's leaving the site, but will also impact on the braking ability of the nearly 10,000 other road users travelling down the descent to the lights. This creates a perfect storm of significant increased risk of additional collisions at the traffic light location.

I can see no consideration in any documentation and have genuine concerns for safety of us all on this point.

### **Safety of pedestrians at site entrance.**

I am sadly acutely aware of the vulnerability of pedestrians around mineral carrying vehicles. I present to the enquiry two widely available images which starkly show the very significant blind spots to pedestrians as AJW4&5 These pictures accurately represent the scenario of the actual type of vehicles the quarry would use, exiting and crossing the footpath on Wolverley Road.

Mr Hurlstone, in his letter dated 10<sup>th</sup> March 2023, in paragraph 4 confirms there was no recording of pedestrian movements and states 'Pedestrians should be walking on

the footpath and therefore not sharing space with HGV traffic beyond the access crossing....' I wish I could tell the enquiry that I have not dealt with fatal accidents involving pedestrians on footpaths, but I can't. The Wolverley community will know that in 2023 one of our children received a serious injury when struck by a large vehicle (a bus) when crossing this very road, less than a ¼ mile away.

To take no account of pedestrian movements is to ignore a whole segment of increased risk in my opinion.

The footpath that the proposed site now cuts through with over 126 HGV vehicle movements a day. This equates to 756 vehicles a week, 39,312 a year, and 393,120 HGV movements across this path over a 10-year period, even more if Sunday working is later approved. That's nearly 400,000 times over a 10-year period that an HGV will enter or exit a site, crossing this footpath.

It is my understanding that this very footpath, that's due to be crossed nearly 400,000 times, is also a 'safer routes to school walking route' as designated by the local district/county council, from the traffic lights at the A449 all the way to the two schools in Wolverley.

The inquiry as already heard with regards to the Lea Castle development, which I also understand may include a new primary school in the fullness of time, but unlikely to warrant a new secondary school. It is therefore very likely that more and more school children as well as dog walkers, joggers and pedestrians of all types will increase as that development does. It is pertinent at this point to draw the inquiry's attention once again to the blind spot pictures AJW 4&5 in light of hundreds of thousands of times that these very vehicle types will be crossing the footpaths with children walking sat in these very blind spots, Factor in how busy this road can clearly get, and how much of a gap these laden vehicle will take to enter and exit, then you have this potentially deadly time lapse where pedestrians that simply weren't there when the HGV came to a halt whilst waiting for a vehicular gap and have decided to cross in front of the HGV, completely unseen to the unfortunate driver who then decides to drive off. This is sadly quite a common collision type with HGVs in stationary traffic, one I have sadly had experience of.

I apologise if I have missed it in all the documentation I have read, but I simply can't find any risk assessment of the potential for HGV versus pedestrian collisions on this path.

## **Risk Assessment**

I am not a trained risk assessor, but my roles have required me to make both dynamic risk assessments in a variety of scenarios as well as read a great many risk assessments for more planned operations and daily activities in my work place.

In my limited experience incidents or potential incidents are graded with a low medium or high-risk grading based on a number of factors. Depending on the risk grading, there may be a decision about the level of mitigations that need to be put in place to reduce the risk, or whether the activity should be stopped as its risks can't be mitigated or prevented.

Invariably the risk assessment is a factor of two things. If the scenario occurred, how serious are the potential consequences of this, combined with what's the actual risk or chance of that scenario actually occurring. For example, being hit by a meteor falling to earth is likely to be fatal, but the chances of it happening are so low that the risk assessment would be considered very low. Conversely, choosing to walk across a busy road with your eyes closed, or unseen by the road users could have fatal consequences if it occurred, and is also very likely to occur, so would be given a 'high' risk assessment.

I don't believe that the scenarios contained within this proposal, such as the risk of HGV's causing collision with other road users on approaching the traffic lights due to the descent, and wet, slippery road surfaces in the face of braking traffic; or the risk of pedestrians being injured by HGV drivers who are unable to see them, have been appropriately risk assessed.

I think, without being any more graphic, any scenario involving a collision with an HGV could have serious/fatal consequences.

To bring my statement to a close, in terms of what the actual chances are of a collision of this type occurring, I cannot see any reference to any record of pedestrian data, or reference to the safer route to school at the site entrance in this application. I read about traffic data surveys which were conducted in Jan and March despite the significant increase of vulnerable road users which occurs in the summer months. And when I read about an actual survey conducted in June of this year, the 2700% increase in motorcycle use from 9 movements to 247 was described as 'not a change of significant magnitude'. I saw no account taken of the descent to the traffic lights and no account taken of the reduced braking ability of the HGV's and all vehicles for that matter due to the increased wet and muddy road surface.

I am not trained or qualified to give the inquiry an evidenced based risk assessment of the impact on road safety of this proposal, but I suggest to the inquiry that an accurate and representative assessment of risk to road users simply hasn't been adequately covered in such a vital area.

I have spent most of my career trying to be objective, something that I know is hard when a proposal impacts you personally. To that end I have thought long and hard about being objective now. Quite simply, if this proposal concerned a quarry much closer to my house, but the site entrance was on a flat country road, with no footpath, no local schools, no traffic lights with standing traffic nearby then I would not be sat here before you expressing concerns of the safety to this community which means so much to me.

I thank you for the opportunity to speak before the enquiry.

Andrew Webber











