Moorhouse Tile Works, Westerham Road/A25, revised planning application. Reference 2016/1036.

Having reviewed the revised application, Westerham Town Council objects to the proposed development as it fails in every aspect to address the reasons for the previous application’s refusal.

Despite the reduction in size of the new buildings it remains a site which will generate an unacceptable level of additional traffic movements on a road network which is already at times close to capacity and thereby puts enormous strains upon local communities.

The transport submission, whilst a very detailed 226 pages, significantly fails to deal with the problems an increase in both heavy and light diesel goods vehicles will have on our road network. Having focused on historical data they have pointedly not included their own business projections for growth over the next five years. This is a material consideration in responding to this application.

A very detailed survey and comparison with sites identified by the applicant as comparable to Moorhouse shows the following analysis.

**Background.**
Tandridge District Council, (TDC), on 17/12/2015 refused Roxhill Developments application to demolish existing buildings and erect up to 20,938 sq. metres of parcel distribution warehousing across four plots.

The revised application is based upon the following proposal.
1. New DPD parcel distribution warehouse of 60,218 sq. ft.
2. Two commercial buildings of 40,000 sq. ft. in total.
3. Existing Redland Tiles land of 6 acres removed from the application as being retained by them for an ongoing distribution facility.

**The DPD Business model.**
Their own website defines themselves as; “The UK’s fastest growing parcel delivery company investing in 2015 £14m to build four new super depots. Each super depot is capable of handling 25,000 parcels a day.
...each super depot will still have significant capacity to continue growing for years to come.”

The delivery capability and linked LGV numbers set out in DPD’s website for units identical to Moorhouse are a serious disconnect from the transport data in the Planning Application which massively understates the operational intent and related traffic movements.
Each super depot is supplied overnight by HGVs from the DPD hub in the Midlands. Moorhouse will be a super depot making parcel deliveries into its distribution area using Light Goods Vehicles, (LGVs).

1. The distribution area described as the Westerham Area is a misnomer. It extends north almost as far as Lewisham, south almost to Hailsham, east to Staplehurst, west to Epsom and Reigate.

   This is an area of 750 sq. miles. Around the periphery are 6 adjacent existing depots. The logic of dispatching LGVs 40 miles South via narrow winding roads when there is a depot within 8 miles of the periphery eludes us.

2. LGV parcel delivery capacity per day is in the range of 80 to 120 per vehicle. The DPD model emphasizes customer satisfaction through timed deliveries. The higher the volume of timed deliveries the lower the numbers that can be carried each day and conversely the smaller the parcels the more that can be carried.

   The Roxhill first application cited 100 vans handling 7000 parcels. Interviewing DPD drivers and others Companies similarly involved gives a range of 80 to 120 parcels as above with which we agree. In a working day of 8 hours and 100 deliveries, even allowing for excellent computerized route guidance, it is difficult to see how much improvement over one parcel every 5 minutes can be achieved. Travel to and from the delivery area is in addition to delivery time.

   Therefore if the 25,000 parcels per day initial objective is to be achieved at an average of 100 per LGV per day the LGV numbers must increase pro rata to 250 and daily traffic movements of 1,000.

   Whilst the site plan in the application identifies 121 van spaces, this is not a limiting factor. 7.2.6 and 3.8 in the application confirms all vans go to drivers’ homes after the shift so employee travel in own vehicles is negligible despite 99 spaces being provided.

   DPD say that Moorhouse will be 4 times more efficient than Dartford which handles 10,000 parcels. This 40,000 parcel per day growth objective is realistic as the LGV requirement of 400 is easily managed at the Moorhouse site via timed arrival and departures with minimal waiting time.
40,000 parcels per day requires 400 LGVs which creates 1,600 movements from the site plus employee vehicles plus HGVs plus units 2a and 2b.

THE TRAFFIC CONSEQUENCES FOR THE AREA AND SPECIFICALLY WESTERHAM ARE SEVERELY ADVERSE AT 250 LGVs AND CATASTROPHIC AT 400.

3. We have analysed the LGV movement times out of the DPD Stoke super depot which was built in 2015 and quoted by DPD as capable of 25,000 parcel deliveries per day and growing. Moorhouse is the same size as Stoke and the growth objectives the same.

LGVs are loaded between 5am and 8am, 96% leave with their parcels at peak time between 7.30a.m and 9.30a.m returning between 2pm and 7pm. 60% return to depot at peak time between 4pm and 6pm.

However either the LGV or the driver in own transport generate two further traffic movements getting to work and returning home.

The Roxhill application under 7.2.6 and 8.3 refers to all vans arriving from drivers’ homes so the residual employee traffic is reduced to 20 for which there are 99 parking spaces.

In respect of the Moorhouse location neither public transport nor walking/cycling are realistic options to diminish traffic generation.

Vehicle movement comparisons.
The Roxhill application uses 1989 Moorhouse site movements when the location was fully operational, as a base entitlement of 862. Roxhill then calculate traffic from their application plus existing Redland movements and a deduction of 95 movements from existing DPD deliveries on the A25. (There were none on our traffic survey).

This methodology results in a nominal 3.8% total increase in A25 traffic.

This approach is completely flawed and inaccurate as follows;

1. From our own traffic survey and the cessation of two major infill contracts affecting 2014 and 2015 HGV movements on the A25 the current daily base is 9,500. The Roxhill “Independent Survey” of 11,301 vehicles is highly inaccurate. The 9,500 is entirely in line with Government statistics and trend over the last decade.

2. The Moorhouse DPD application is for a super depot as per the recently built Stoke, Cardiff, Dagenham and Exeter depots. Whilst initially they may only handle parcel numbers as per the planning application and linked LGV numbers, they are designed for a capability of
25,000 plus, see DPD website – “We’re investing in capacity for the future, so these huge depots will be able to continue to grow for the next five years and beyond.”

25,000 parcels means 250 LGVs means 1,000 daily movements.

3. Our analysis of the post codes to be delivered to by Moorhouse and weighted by population, results in LGV traffic of 59% through Westerham and 41% towards Oxted.

The geographic footprint of the distribution area will give additional traffic flows South through Crockham Hill and Edenbridge.

The South of the A25 site is a significant AONB and highly valued landscape used extensively by cyclists, ramblers, hikers and visitors to our National Trust properties.

The narrow winding roads are ideally suited to these pursuits but would become dangerous if commercial vehicle traffic increased in the absence of alternative main roads.

We see no evidence in the transport assessment statement of this wider traffic impact.

4. Roxhill argue that DPD traffic is already in our area and quote 95 LGVs per day on the A25. In our A25 survey there were no sightings of any such traffic including their Interlink partner.

Whilst we accept there are current deliveries, the establishment of an adjacent depot changes Westerham and area to a conduit to a wider area rather than an ad hoc destination.

5. The suggestion that 1989 traffic levels from the site are an appropriate base statistic is ingenuous but irrelevant.

Is Moorhouse suitable as a Parcel Distribution location?

Stoke, Dagenham and Exeter are three recently built DPD parcel distribution warehouses of same size.

All are contiguous with existing industrial zones and motorway or modern standard A roads as immediate conduits for either HGV or LGV traffic thereby avoiding the impact that Moorhouse will have on Westerham and Oxted. Moorhouse is an inappropriate location.
Traffic increase.
Using the LGV delivery and return timetable plus driver and staff traffic gives a serious adverse impact at peak times through Westerham.  

<table>
<thead>
<tr>
<th>Time Period</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>6am to 7am</td>
<td>35%</td>
</tr>
<tr>
<td>7am to 8am</td>
<td>14%</td>
</tr>
<tr>
<td>8am to 9am</td>
<td>20%</td>
</tr>
<tr>
<td>4pm to 5pm</td>
<td>17%</td>
</tr>
<tr>
<td>5pm to 6pm</td>
<td>14%</td>
</tr>
</tbody>
</table>

Revising the LGVs to levels that are anticipated plus proposed employee vehicle numbers and the Units 2a and 2b traffic will result in an increase in site traffic of 80% as compared to 1989 and 350% over current levels.

The estimate of traffic from Units 2a and 2b appear understated for any form of commercial activity.

DPD operate a ParcelLock system. This offers other distribution companies and supermarkets the ability to store and distribute own goods from DPD sites using own transport. The transport analysis takes no account of such extra traffic.

Quantum of Indicative Development and Trip Rates.
Despite the comparable DPD Stoke site being next to a dual carriageway that connects to two adjacent M5 junctions, planning constraints relevant to its B8 status severely restrict peak time traffic movements. B8 usage is limited to 0.32 movements per 100 sq. metres of space so for 5575 sq. metres the traffic maximum is 18 movements from 8 to 9am and 5 to 6pm.

DPD agreed to limit movements to 17 at these times in respect of their new build. It would not be possible to adhere to such small figures and operate 60,000 sq ft of distribution warehouse commercially.

DPD traffic survey for Moorhouse as submitted to TDC shows 73 and 64 at these peak times. These estimates are massively understated and will be substantially larger if parcel delivery daily numbers increase as planned.

Transport Summary.
Our examination of the transport submission shows how erroneous the statistics are and an extrapolation of traffic movements exposes the significant increase in traffic at peak times contrary to the applicant’s claims.

A further concern is the much wider impact this development would have on the AONB South of the site as well as its intrusion into the site itself.
The area concerned is not only Green Belt and AONB but also includes Special Landscape areas and SSSI crisscrossed by smaller B roads into the Downs, Chart and Weald. Many of these roads are without footpaths, extensively used by cyclists, walkers and country leisure interests.

With a significant increase in larger diesel vehicles there is potential harm to the environment as well as a danger to other road users. DPD delivery vehicles utilize sophisticated Satnav technology to minimize distance travelled which will inevitably direct them along the smaller B roads to Crockham Hill, Edenbridge and across Ashdown Forrest.

It is out of contention that for the above reasons the application fails to demonstrate that it would not severely affect traffic by aggravating and increasing traffic congestion, changing traffic volumes and significantly altering traffic composition on local roads. The area to be served by the application is substantial with Westerham and Crockham Hill primary conduits to the East and much of the South. This is contrary to the NPPF Transport Policies which seek to conserve and enhance the natural environment, reduce pollution and its effect on health and impact on the natural environment including the general amenity of the area.

Traffic dangers.
The East West distribution of movements will create some 500 dangerous manoeuvres crossing the traffic flow of 900 vehicles per hour during each two hour peak period. The extra peak hour traffic impacts upon parents and children safety at the Limpstield and Crockham Hill schools and adds to pinch point driven congestion and pollution in Westerham.

The sight lines on the A25 curve approaching the Moorhouse entrance from the West are poor and create extra hazard in respect of high numbers of carriageway crossings as above.

The A25 through Westerham.
This road is unsuited to increasing volumes due to “pinch point” factors. Listed buildings narrow the existing carriageway. Of the 148 in Westerham, several are on the A25 including the National Trust’s Quebec House.

At the three pinch points the width available is as little as 4.78 metres and none achieving more than the Government’s requirement for a Residential Street of 5.5 metres, let alone an A road.

Policy DPD5 requires that traffic does not unnecessarily impede the free flow of traffic on the existing network or create hazards to that traffic and other road users.

The application fails under this policy due to the severe increase in traffic volume created.
Planning Policy Objections.

1. The proposed new buildings are still of similar scale and design to those in application 2015/1217 and will have an unacceptable urbanizing impact on the Surrey Hills AONB and impact on the visual quality of the AONB in Westerham Parish.
   The development does not respect the setting of the AONB and its place in the living landscape, the scale and mass are not characteristic of the area and an incongruent intrusion.
   This impact and harm should be given substantial weight because the site is located in the AONB.
   The development neither conserves nor enhances as is required in respect of any developments in the Surrey Hills AONB.

2. Westerham, as a focus for tourism and recreation in the countryside for people living in London, is already under severe threat from the volume of traffic passing through the Town centre and its very viability will be further undermined by this development.
   Westerham’s many heritage assets are already being damaged by traffic exacerbated by their proximity to three traffic pinchpoints"

Your own policy DP2 (B) recognizes this in terms of Oxted but we would argue that you have a wider responsibility to other Town centres affected by this development.

DP4. (1). “The site is unsuitably located, for example because of inadequate access for heavy goods vehicles or the harm to the amenities of nearby residential property by reason of traffic, noise or general disturbance…”

DP10. (B) “A new development would be harmful to the Greenbelt by virtue of its size and bulk”

13.1-this restricts any increase in commercial building of disproportionate size by its external volume.

DP8 of the Surrey Hills AONB states:“Proposals that would have a negative impact upon views into and out of the AONB and which do not respect the setting will not be acceptable. The Surrey Hills AONB acknowledge the wider values and views of the AONB as a living landscape.”

The application fails under these policies.

Very Special Circumstances. (VSC)

The site is located in the AONB, where NPPF paras 115 and 116 require that “great weight should be attached to conserving landscape and scenic beauty” and that planning permission should be refused for major developments in these designated areas except in exceptional circumstances.
The Surrey Hills AONB goes further to require any development not only to conserve but also to enhance.

**This application neither conserves nor enhances.**

The applicants’ paragraphs 5.28 - 5.57 argue the VSC case.

VSC4: The revised application results in a net increase in B2/B8 provision. The Tandridge Economic Needs Assessment concludes that the demand for B2/B8 is projected to decrease over the plan period and suggests an oversupply of vacant land in the District and therefore to maintain optimal levels of vacancy the estimated net demand could afford a further decrease of between -6.5 ha and -7.9 ha in the period up to 2033. This assessment shows that an increase of B2/B8 on the site is contrary to the evidence base in the emerging Local Plan and therefore no weight should be given to this VSC.

VSCs 1, 2, 3, 5 and 6 are as per the previous application. The Officer’s report for the 2015/1217 application concluded these VSCs should be afforded no weight. This conclusion should apply to the new proposal because the changes to the revised proposal do not affect these circumstances.

**The application is an inappropriate development in the Green Belt and in the AONB for which there are no Very Special Circumstances that outweigh the harm.**

**Air Quality.**

Westerham Town is registered as an AQMA under adopted EU legislation. The centre of Westerham in the latest monitored readings exceeds the NO2 readings against a target of 40.

Planning Authorities have a duty, through their decision making, to prevent or reduce breaches of EU law including the Air Quality Directive. This duty is reinforced through the NPPF policies, which state “…contribute to conserving and enhancing the natural environment and reducing pollution.”

In addition PPG 15 states “Concerns could arise if the development is likely to generate Air Quality impact in an area where air quality is known to be poor….lead to a breach of EU legislation.”

Planning Authorities have a statutory obligation to make decisions taking into account Development Plans as well as National Planning Policy. Under these there is no need to take into account any other material considerations (s70 Town and Country Planning Act 1990).
The potential for a development to cause ill effects off site such as traffic congestion and pollution is accepted as being a material consideration and should be referred to the Environmental Agency. This does not however enable the relevant planning authority to abdicate responsibility for its decision in considering a planning application.

Planning Authorities must try and prevent developments from worsening air quality and achieve best air quality to justify the principle of “sustainable development.”

In addition we are advised that granting permission would be illegal under current EU law requiring the Authority to refrain from any action that would prejudice fulfillment of EU law obligations. Failure to follow this principle could lay Tandridge District Council open to civil action.

**The application fails under this EU law and UK planning policy on air quality.**

**Sustainability.**
There are no viable options to access this site other than by car/van/lorry/motorbike.

This conflicts with the sustainability principles set out in the NPPF and Local Plan Policy DP1 and DP5(4) which requires that suitable access to a site is achievable by all and that access by public transport, foot and bicycle is promoted. Additional Green Belt harm is identified by this failure.

**The application fails under this heading.**

**Westerham Town Council 4th August 2016.**