DEVELOPMENT AFFECTING ROADS  
TOWN AND COUNTRY PLANNING GENERAL DEVELOPMENT ORDER 1992

Applicant: Roxhill Developments

Location: Moorhouse Tileworks, Westerham Rd, Oxted TN16 2ET

Development: Demolition of existing buildings and erection of Class B8 commercial building, access, servicing, parking and landscaping.

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<th>Consultation Date</th>
<th>1 July 2016</th>
<th>Response Date</th>
<th>17 November 2016</th>
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The proposed development has been considered by THE COUNTY HIGHWAY AUTHORITY who has assessed the application in terms of safety, capacity and policy and recommends the proposal be refused on the grounds that:

1. The proposed development results in an intensification of use of the site which is considered to be in an unsustainable location. The proposed operation of Unit 1 is not considered to be sensibly or sustainably located in order to serve the catchment proposed by the developer thereby resulting in excessive mileage for both HGV’s and delivery vans. The proposed development is located where availability of modes of travel other than private vehicles is extremely limited for staff travelling to and from the site. In addition, existing high levels of employment in the immediate locality mean that prospective employees are likely to be travelling from far afield, also with limited modal choice and therefore contributing to excessive mileage by private vehicle. The proposed development is therefore contrary to the objectives of the NPPF (2012), policy CSP12 of the Core Strategy DPDS (2008) and policy DPS of the TLP Part 2: Detailed Policies (2014).

2. In terms of trip generation, distribution and parking provision it has not yet been demonstrated that the proposed operation of the site is acceptable and in accordance with the objectives of the NPPF (2012), policy CSP12 of the Core Strategy DPDS (2008) and policy DPS of the TLP Part 2: Detailed Policies (2014).

INFORMATIVE NOTE TO CASE OFFICER

Previous Application

TA/15/1217 refused at Committee December 2015, four reasons summarised below:
1. Inappropriate development in Green Belt

2. Failure to conserve / enhance AONB

3. Acceptability not yet demonstrated in terms of trip generation, distribution and parking (reason recommended by SCC)

4. Due to 3, acceptability also not demonstrated in terms of air pollution

SCC also previously recommended refusal on sustainability grounds but that reason was not supported or taken forward by the planning committee at the time. As additional information has since been provided by the applicant regarding the potential operation of the site, and in light of the fact that SCC remains concerned in respect of such an intensive use of the site, SCC requests that the LPA reconsiders this view as part of the current planning application.

Current Proposal - TA/16/1036

- Storage and distribution 9,322m² over three units (previous application was 21,315m² over four units). Unit 1 is the bespoke DPD distribution depot, this has not changed significantly; the other units have been reduced, as has the site area which is the subject of the planning application. The existing Redlands operation will now be rationalised and retained.

- Unit 1 includes 104 car parking spaces (since reduced to 70 plus 5 visitor spaces), 121 van spaces, 12 HGV spaces and 12 loading docks. Unit 1 continues to have an over allocation of spaces.

- The generic B8 units (2a and b) are outline and accord with Tandridge parking policy.

Technical Work

Roxhill Developments Limited employed David Tucker Associates (DTA) as their Transport Planning Consultants. DTA first approached SCC in November 2014 in respect of the previous planning application. Since that time there has been correspondence back and forth, including a Draft and Full TA's and various technical addendums and revised drawings. There have also been meetings between SCC and DTA, also attended by Tandridge Officers and Roxhill. This response has considered the following recent key documents and various discussions and email correspondence between all parties:

- DTA Transport Assessment dated May 2016

- DTA Response to Surrey County Council’s comments of 22/07/16 – dated 22/08/16

- DTA Transport Commentary dated 21st October 2016

Outstanding Concerns

The technical work to date has clarified some matters however the most recent Transport Assessment, including the commentary dated 21st October 2016 contains information of concern to SCC as follows:

- The trip profile of surveyed depots indicates a trend of arrivals and departures occurring at network peak times and throughout the afternoon, not predominantly before 7am or after 7pm as indicated by the applicant

- Trip rates are based on Stoke and Dagenham sites which are acknowledged as not operating at full capacity (see p9 of 21/10/16 commentary) and are also very different in terms of the surrounding population density
• The postcode areas to be served cover a significant distance and a greater population than was previously understood. A high proportion of this catchment is remote from the site and not served by appropriate and strategic routes (see Appendix A of 21/10/16 commentary)

SCC’s fundamental concern is that the scale of the development, DPS’s stated machinery processing capability, HGV and van arrival and departure profiles and the over provision of parking means that the site could be readily used more intensively than has been currently assessed (see references to future growth at paragraphs 4.3.13 and 5.3.6 of the TA). The growth in this market and the aspirations of DPD are acknowledged by the applicant themselves and the intensive use of this site in an inappropriate location is considered a real and likely risk, exacerbating the inadequacies of the location, in terms of mileage travelled by all vehicles and potentially resulting in the proposed access not being fit for purpose in terms of its operation and capacity.

SCC acknowledges that a sensitivity test increasing the trips rates for unit 1 by 50% has been applied in an attempt to address this. As this is based on under-capacity base flows, the operation of sites with quite different population patterns and questionable estimates of the carrying capability of vans and van driver working hours, operations and routes, SCC is concerned that this “reserve” could soon be reached and exceeded. The 21/10/16 commentary (page 2) acknowledges that additional van departures can take place in the afternoon during peak times, effectively doubling the TA assumptions with no further investment or development of the site. It is not clear when the second tranche of HGV arrivals and departures would be, or where the additional vans come from. If the existing employees do not have capacity to return to site (as we are told they would not until 7pm) then additional / new drivers and vehicles must be coming from elsewhere resulting in additional van trips to and from the site.

The applicant states that “following the departure of the vans, the warehouse would largely be empty” (see 21/10/16 commentary), SCC remains concerned that DPD would soon fill this void with additional HGV arrivals and additional van shifts as demand for deliveries inevitably increases.

The developer states that the proposed operator requires “access to the local homes and business that require parcels to be delivered”. SCC would suggest that such a development should be cited closer to those populations, or more centrally, rather than a remote and unsuitable location, bound to the north via the M25 and flanked to the east, south and west by sparsely populated rural villages. From a planning point of view and the technical information so far submitted, the location does not appear to be appropriate for the proposed use.

There has been no assessment of the wider implications of the mileage travelled to and from this site beyond the immediate locality and no quantification of the impact of the trips on air quality. SCC believes the LPA should consider these issues in respect of routes within both Surrey and Kent.

In support of these conclusions, SCC requests that the LPA notes the following points:

Site Access and Safety

• A revised junction including new right turn lane is to be provided. Safety Audit work has been undertaken by SCC and a designer’s response provided the applicant. The most recent drawing, which has been agreed in principle and is subject to detail (ref 101 revision J), includes a revised two-way proposal for the lay-by in response to SCC’s request.

• The proposed access is considered safe and suitable for the level of trips currently assessed within the Transport Assessment; however the proposed junction configuration may not be sufficient to accommodate significant future growth.

• There are crossing issues in vicinity of Limpsfield Primary School.

• The impact on the signalised junction Wolfs Row/A25/B269 has been assessed, as per the current TA levels and the developer believes no further intervention is required. SCC has not undertaken a
detailed audit due to time constraints but notes this conclusion which does not change the recommendation above.

Sustainability / Location Issues

- SCC considers this to be a remote and unsustainable location.
- Although the A25 is a strategic route, the site is some distance to the motorway network and has limited population in close proximity.
- There are no real alternatives to travel to and from the site than private vehicles for the limited number of site based staff. Vans will travel from a wide range of origins and generally be single occupancy with no real opportunities for any sharing or mileage savings.
- Bus and rail services are extremely limited within close proximity and the effect of any Travel Plan is likely to be minimal, though should still be provided should permission be granted (draft framework has been submitted by developer and is acceptable)

Trip Generation

- Comments have previously been provided by SCC querying the approach to trip generation and the potential for trips being under-estimated. The developer has since provide a revised TRICS analysis for units 2a and 2b and commissioned independent surveys at their own depots and used these as a basis in respect of unit 1.
- SCC is concerned that the surveyed units are not operating at full capacity and are not located in areas akin to the location of the proposed development.
- The proposal potentially reduces the number of HGV’s compared to the extant use, though SCC is concerned that the TA estimates may be too low in terms of the number of HGV’s that would serve the proposed development.
- The existing Redlands operation will also now be retained.
- The commercial aspirations of the proposed operator and the growth market of parcel distribution are a cause for concern and indicate that trip generation assumptions may be under-estimated. The impacts need to be considered robustly at peak times but also over the day, night and weekends.
- This is a difficult and unsustainable site no matter what land uses are proposed. Alternatives may however have a more generic and well understood trip generation pattern, thereby giving a more accurate estimate of future trip generation.

Travel Plan

- Commentary by SCC dated 27 July 2015, addressed by the applicant
- Overall the effect of a travel plan at this location will be limited

Potential Mitigation

- Reconfiguration of access and retention of existing lay-by (developer and SCC have agreed a scheme in principle)
- Contribution towards safety measures in the vicinity of Limpsfield Primary (developer has indicated agreement in principle)
- Improvements to public transport (not yet explored with the applicant)

Overview

SCC has consistently maintained concerns regarding the remote and unsustainable location of the site. SCC has also consistently questioned data provided by the applicant in terms of trip generation, distribution
and justification for the over-provision of parking. Despite additional technical work received to date SCC is not yet satisfied that the proposed development is acceptable from a transportation perspective.

**Conditions**

Should the LPA be minded to grant planning permission SCC would please reserve the right to recommended conditions upon any future permission in order to minimise the impact of the development as far as possible, the following is a general indication of matters likely to be required:

- A cap on site movements with associated and agreed enforceable monitoring (please note SCC has concerns about such an approach but a cap would at least be preferable to unfettered use of the site and would limit the impact of the development to some degree in the immediate locality. This would not however address the fundamental locational concerns held by SCC).
- The restriction of units 2a and b to prevent use as parcel distribution
- Revised access to be delivered via a Section 278 Highway Works agreement
- The future monitoring of the proposed access junction in terms of capacity and safety
- Parking and turning retention
- Travel Plan provision
- The funding of a signalised crossing in the vicinity of Limpsfield Primary School

Date: 17/11/16