Response to TDC 2016/1036 from the Westerham Town Partnership

20 November 2016

Having studied the revised Transport Assessment for the above application dated 27 May 2016 and the updated DTA Moorhouse Transport Commentary dated 21 October 2016, the Westerham Town Partnership would like to make the following observations and ask that councillors take these into account in making their decision. Quotations from the latter document itself are italicised below.

Growth of Business

In terms of the maximum capacity, it should first be noted that capacity is not the same as demand. The average demand volume at the depot would be 18,000 parcels, rising to 25,000 parcels during peak periods (Christmas).

DPD has always avoided declaring the ultimate capacity of the proposed development. We assume that the DPD business plan must have at least a 5 year lifetime. Demand is currently growing at 16% pa. ([www.twenga-solutions.com/en/insights/eccommerce-united-kingdom-facts-figures-2016](http://www.twenga-solutions.com/en/insights/eccommerce-united-kingdom-facts-figures-2016))

If the depot starts at average of 18,000 parcels/day, by the end of the first year the average will be 20,800, second year 24,200, third year 28,000, fourth 32,480, and by end of fifth year 37,676. It is clear that the traffic generated by the site will have doubled in 5 years. The corresponding peaks in these years would be 28,900 and 33,600 and 38,900 and 45,100 and 52,000. We can only assume that DPD is wary of disclosing the projected growth of business at this site.

How can it be acceptable that growth figures do not form part of the application?

Growth of distribution area

In June 2016, the Westerham Town Partnership was invited to meet with Roxhill and DPD who were keen to test community reaction to their new submission to Tandridge Council. We were given a map of the postcode areas they proposed to service from Moorhouse, which seemed rather large as it covered Reigate to beyond Paddock Wood and Elmers End to way south of Uckfield. When we queried why existing DPD warehouses which were closer, could not service these postcodes, we were told they were already over capacity.

The updated TA in October proceeded to list an even larger number of additional postcodes. Analysis of the 2011 census figures showed that the population in this proposed delivery area was to 1.95 million, compared with 865 thousand in the area proposed in June. The new list included postcodes in Croydon, Dartford and Crawley, which appear to be the postcodes of existing DPD depots. Are these now over capacity? So although the submission was for the same number of vans as last year, we are now told it would cover well over twice the population.

This is alarmingly inconsistent. It would also imply that demand for deliveries has outstripped the company’s forecasts for many of its current depots. This reinforces the need for the applicant to provide details of projected growth and maximum capacity of this site.
Capacity of vans

The Dagenham site was used for comparison with Moorhouse but without properly disclosing vital statistics that must surely be available, like the number of parcels delivered that day and the number of vans used.

“During the Dagenham survey there were 20 inbound HGVs of which 11 inbound HGVs were articulated, which equates to around 16,500 parcels per day.”

It seems rather bizarre to have to work backwards from the number of HGVs that arrived to find out how many parcels were handled on the day of the survey.

The DPD software must record the total number of parcels delivered by each HGV and number of parcels carried by each van on every trip: this surely does not have to be “estimated” (see elsewhere). The updated TA still does not mention how many LGVs were used in Dagenham during the survey. This statistic must surely be recorded every day of the year – it is the overall measure of throughput and efficiency for every site and one would have expected it to be gathered by the DPD QA system.

DPD has failed to provide easily available computer records to support their proposal.

Parcels per van and working hours

Vans would depart from Plot 1 from around 7.30am. The region is currently operating at 1.33 parcel stops per delivery stop, meaning that 180 parcel stops per day equates to 135 delivery stops on a typical route. During peak periods (Christmas), additional van departures would take place later in the afternoon/early evening;

Vans would return to Plot 1 around 7pm.

If it takes 1.5 hours to load a van, which leaves the depot at 7.30 and arrives back at 7pm to unload, this would imply drivers are working more than a 13 hr day, plus time on the road driving to and from home. We consulted www.netlawman.co.uk/ia/driving-work-great-britain-uk to learn about legal driving limits in the UK. It has a maximum time of 11 hours on duty and maximum driving time of 10 hours.

Second shift: The comment that it would be possible to run a “second shift” using additional vans starting in the afternoon or evening confirms our worst fears about an intense 24/7 operation.

DPD drivers we talk to say they carry max of 120/130 parcels, not 180. This implies 50% more vans are needed.

Road safety and driver welfare

We are greatly alarmed by a BBC report of Amazon’s delivery practices, as broadcast on 11th November 2016. See also www.bbc.co.uk/news/uk-england-37708996 This implies a level of competition in the delivery industry which can only lead to accidents and a bad reputation for that
business sector. **But the conclusion for us today is that that van numbers can only rise when legislation is introduced to enforce a sensible working day.**

**Road congestion**

We are particularly worried by traffic during rush hours, so any statistics that quote percentage changes in overall vehicles/day are meaningless. The key metric must surely be the waiting time to join or cross a traffic stream which at some point becomes so dense that a queue is at a standstill. The Moorhouse junction from around 7-9am has been measured to have an average gap of 3.6 secs between vehicles. In a few years we could be looking at adding another 200 vehicles queuing to turn into and out of the T junction.

**Overall worst estimate**

In five years’ time we estimated a peak of 52,000 parcels/day. At 130 parcels/van this would require 400 vans. With four vehicle movements/day and other traffic from HGVs, staff and visitors, it is not difficulty to see how a ballpark of 2000 vehicle movements/day could be generated in a 24/7 operation. In the 2015 application, the Moorhouse tile works was set to close, now it is to remain open, and sites 2A and 2B are still unoccupied.

**East-West distribution from Moorhouse**

Analysis of the routes taken by vans leaving Moorhouse reveals an alarming statistic. If we consider just the CR (Croydon) postcodes, only Caterham would be accessed by turning west out of the site towards the A22. Considering the regular congestion in Limpsfield, it is much more likely that drivers would use the Croydon Rd Westerham for all other CR postcodes. Removing CR3 and the KT, RH and SM postcodes gives a total population of 1,430,763 in destinations east of Moorhouse.

*This equates to 73% of the total traffic movements entering Westerham.*

*Furthermore, in transport terms, the proposal is situated on the A25 and as such is a more suitable location for Class B uses than the narrower and more winding routes that characterise other parts of the District.*

Anyone who has visited Westerham knows that the A25 is narrow and winding.

The width of the A25 at either end of Westerham narrows to 4.8m - the government specification is 7.3m for this class of road. There is another pinch point at London Rd junction with the A233 and there have been accidents in Quebec Sq at the foot of Hosey Hill. See [http://www.visitwesterham.org.uk/wp-content/uploads/2012/01/LCV_WTP_Impact_V6_Web130716.pdf](http://www.visitwesterham.org.uk/wp-content/uploads/2012/01/LCV_WTP_Impact_V6_Web130716.pdf) Traffic negotiating the pinch points and sharp junctions on the A25 already seriously exacerbates the high pollution levels. For years, Westerham has been listed as an AQMA on the DEFRA website. This month there has been a high profile court case: [www.edie.net/news/11/UK-Government-air-pollution-court-case-won-by-ClientEarth-and-Sadiq-Khan/](http://www.edie.net/news/11/UK-Government-air-pollution-court-case-won-by-ClientEarth-and-Sadiq-Khan/) The Government has responded positively and has accepted the ruling that plans must now be revised without delay to meet the EU (and UK) limits on air pollution, and
there appears to be a legal requirement to avoid any measures that worsen the situation in the meantime.

**History of the Moorhouse site**

The site has been a sandpit and manufactured roof tiles for 50-70 years. Working normal hours Monday to Friday, it has been seen by the local community as an acceptable rural industry. By contrast, a full 24hr / 7 day operation of a depot to deliver parcels to a vast area which includes Crawley, Dartford and Romford, Bromley, Croydon and Uckfield, where every van movement will start and end at Moorhouse, seems set to ruin rural communities and local economies. **This sort of operation surely does not belong in a landscape which is designated an Area of Outstanding Natural Beauty.**