The Westerham Town Partnership (WTP) is a Community Interest Company with the remit:
• To provide a forum for those interested in promoting the Town & Parish of Westerham with the aim of encouraging collaboration, partnership and working together.
• To promote the Town & Parish as a good place to live, visit and work thereby improving the economic and social well being of the area.
• To support conserving and enhancing the character, culture, heritage and environment of the Town & Parish in its entirety.
• To disseminate information about the Town & Parish and its events.
• To support existing and new projects, presented by groups or individuals, for the enrichment of the community.

The WTP objects strongly to any proposal to develop the Moorhouse site that increases traffic flow through Westerham Town Centre.

WTP argues that the current proposal (2016/1036) to build a parcel Distribution centre of 60,000 sq ft seriously underestimates ultimate traffic generation when the site is fully operational. There is also unknown traffic generation from the remaining 40% of the site. Overall this will lead to increased traffic flow in an area where road widths (in three separate locations) are 4.8 m, well below statutory requirements of 7.3m and a vehicle often has to mount the pavement to allow another to pass (see Appendix 1). Add to this the increasingly frequent arrival of overflow traffic from blockages on the M25.

Discussion of any such development is unrealistic without direct access on to the M25 or a Westerham bypass and neither of these is on the agenda.

The WTP has authored a document entitled ‘The Impact of Traffic & Commercial Vehicles on Westerham’ (Appendix 1) which evidences the planning objections referred to below. This document illustrates why Westerham cannot accept the proposed increase in delivery vehicles
given existing, including HGV traffic. It includes details of why the setting of Westerham is sensitive to the proximity of the A25. Westerham’s heart receives traffic from six roads, but its below-statutory road widths, three pinch-points, steep, sharp bends, narrow pavements and existing AQMA status make it unsuitable for its existing traffic, let alone an increase in volume.

The Westerham Town Partnership objects to the plan because:

1. **Severe adverse effect** is caused by traffic increase on Westerham Town Centre, including noise, pollution and danger to pedestrians and listed buildings. The Westerham Residents’ Association challenges the projected volume of CVs, which we endorse. The traffic predictions in the Developers’ analysis are entirely unsound and WTP challenges the conclusions. Appendix 2, the findings of the Residents’ Association, analyses the facts, which predict much larger volumes than postulated in the application. The Town Partnership concurs with the conclusions.

Existing Traffic Volume vs. Predicted Traffic Volume:
Even if the developers’ predicted traffic were accepted, the figures are compared with Redland flows many years ago, and not with current volumes from the site. Although this may be technically correct in planning terms, it seems grossly inappropriate in the setting of the old market town of Westerham. We submit that total A25 traffic volume has increased dramatically in the years since Redland ceased to operate, so that the impact of new similar volume levels on the setting (AONB, Core Strategy Policies) is unreasonable in the context of the road infrastructure in Westerham.

2. **Approving The Proposed Development will reduce Air Quality, which is potentially illegal.** Air pollution is already above legal levels in Westerham Town Centre, an existing Air Quality Management Area (EU and UK law, SCC and Tandridge District Policy aspirations) See Appendix 1 for detail and evidence An SDC Air Quality Management Area (AQMA) covers Westerham High Street, Market Square, Vicarage Hill and London Road. Latest
measurements (2014) show all areas near the Nitrogen Dioxide (NO2) Annual Objective of 40ug/m-3, with Market Square (the centre) approaching 30% higher. Highways England has announced that it is to install more air quality monitoring stations along Westerham’s stretch of the motorway. The M25 in Kent was identified as having some of the highest levels of NO2 and particulates in the country, exceeding EU limits. A Legal Opinion 6-10-15 from Robert McCracken Q.C. for Clean Air London concludes ‘…where a development would cause a breach of (Air Quality Directive 2008/50/EC) in the locality of such development planning authorities must refuse permission; where a development would either make significantly worse an existing breach or significantly delay the achievement of compliance with limit values it must be refused.’

Highway safety will be compromised caused by traffic generation. Road system is inadequate for the projected volume. See the Westerham .Town Partnership Traffic Report V6 2016

The proposed changes for vehicular traffic at the T-junction and layby at Moorhouse shown on drawing Rev G 280515 is considered inappropriate and dangerous

The proposed plans show a new sleeper lane outside the Grasshopper pub for westbound traffic to turn right into Moorhouse. In a survey on 30th June 2016 (conducted with the Residents Association) our analysis showed there are already about 1000 vehicles/hr on the A25 during rush-hour from 7-9am. This equates to a vehicle every 3.6 secs. Currently about 30/hr turn in or out of Moorhouse. When the DPD centre is fully operational (25,000 parcels/day) a further 250 vehicles will need to arrive and 250 leave in that same peak period (and return in the evening). The Sleeper lane will by its nature create a hazard for any right turns out from the center giving no visibility to oncoming cars or to exiting vehicles.

The same drawing shows that all traffic in the layby will be one-way travelling westwards, and entry will be forbidden at the western end, which now becomes an exit. There are very poor sight lines here. Vehicles, especially HGVs, will be crossing the fast-moving, downhill eastbound traffic lane. No local driver would dream of
doing this. Fast-moving cars coming down the hill and around the bend are placed into the path of slow moving out-turning lorries, which is against rules set for new junctions. The issue of visibility here is paramount, as the tree canopies extend out to block the sight line of HGVs. Cutting these trees would need permission as they are under a TPO.

It would appear that eastbound truck drivers who regularly use this layby for (legally required?) tacho breaks will be deprived of this facility. Some may rest overnight. As locals know, trucks always enter at the western end.

The proposed development is at an **unsustainable location**: there is negligible public transport access, and unsuitable approach roads, which do not confirm to trunk road requirements. (National Planning Policy Framework, Surrey County Council and Tandridge District Council own Policy Documents)

**Noise and disturbance, environmental damage to Westerham Town Centre, Croydon Road, London Road, Goodley Stock Road and Hosey Hill**

7. **Effect on listed building and conservation area** from pollution and physical damage. Impact on the Setting of Westerham: Heritage and Economy (See Appendix 1 for detail and evidence) Listed Buildings: Westerham has 140 listed buildings across the parish, many of which are directly fronting the A25. All three pinch-points are directly adjacent to listed buildings on both sides and there is evidence of physical structural damage from passing vehicles. Quebec House, fronting the A25 at Quebec Square is Grade 1 listed.

**Conflict with Structure Plan, Local Plan or Unitary Development Plan policies** (National Planning Policy Framework, Surrey County Council and Tandridge District Council own Policy Documents)
The developer will need both a foul pumping station to carry trade effluents away and storm / surface water attenuation. The large new buildings and large hard standing areas, that will give flash run off and raise the chance of localised flooding to the A25 carriageway and adjacent land These have not been addressed in any of the
•Green belt and AOB (National Planning Policy Framework, Surrey County Council and Tandridge District Council own Policy Documents). The proposed distribution centre is located in the Green Belt AONB where there is a presumption against development. There are no ‘very special circumstances’ shown to over-ride this.

The KENT Downs AONB (DVLP) has just been awarded an HLF grant and EU grant to support the Darent Valley, the source of which is in Westerham.

The application for this particular site is only technically possible because of historic rulings, which relate to the Redlands tile works. It is our belief that a new application on an adjacent site would never be considered at all. Being on the Surrey border, the historic town of Westerham is the gateway to Kent. Its walks take you through AONB countryside and lead to villages in a corridor along the A25 which are some of the most precious parts of the south east rural beauty.

10. Threat to viability and vitality of the town, our economy being largely dependent on the café culture and charm of our centre.

Westerham is in the heart of Kent Downs AONB. Its Management Plan Policies are a material consideration in planning matters. They direct ‘the finding of ways of achieving thriving, vibrant communities and a sustainable and prosperous local economy that conserves and enhances this nationally important area…’

The vision described in the Kent Downs AONB (Management Plan 2014-2019) is that ‘change should reinforce and enhance the characteristic, qualities and distinctiveness of the Kent Downs and its communities…’ See Management Plan 2014 - 2019 Policies MPP, SD, LLC, WT and HCH.

Our predicted number of LCV delivery vans emerging from (and converging on) a site in such close proximity to the town’s centre, would adversely impact these AONB Policies.

Social: Losing important social beneficial uses of our Green, giving rise•
to an adverse effect on our local economy, which is tourist based, and relies largely on the attraction of The Green and High Street.

We welcome local traffic using the town as a destination, but the relentless increase in through-traffic serves to discourage this. As the A25 cuts through the centre and abuts the Green and with many narrow pavements, the whole setting of Westerham is damaged by heavy traffic. Visitors want to relax on The Green near the Churchill and General Wolfe statues, however, traffic relentlessly speeding through the town a few feet away discourages this. There is recent evidence from retailers that shoppers are beginning to avoid Westerham because of the congestion.

Economy: Increasing traffic would adversely impact the SDC Economic Development Strategy Policy. Westerham’s economy depends on tourism and visitors to the town, for our shopping and café culture. Plans with Chartwell and Valley Farm to further promote the town as a destination are well advanced. The September 2015 experience with fire/traffic lights at the Manor House pinch point has demonstrated how vulnerable the town’s retailers are to traffic congestion. Since then there have been two traffic related deaths and two serious traffic related injuries.

Sources:
Westerham’s Conservation Area Appraisal and Management Plan 2014
National Planning Policy Framework
SDC Core Strategy 2011
SDC Economic Development & Strategy 2014
Kent Downs AONB 2014-2019
Appendix 1: The Impact of Traffic on Westerham
Appendix 2: Westerham Residents’ Association challenge to traffic analysis
Impact of Traffic and Commercial Vehicles on Westerham

Westerham is the gateway to Kent and one of the jewels in its crown. It is an ancient market town and the road widths were designed for horse and cart. The A25 through Westerham has two sharp bends and two pinch points where the road narrows to 4.8 metres compared to government specification of 7.3 metres for this class of road. Vehicles frequently have to mount the kerb in order to pass. Inadequate pavements cause an intolerable situation for pedestrians, cyclists and the disabled. This document demonstrates the need to reduce the current volume of traffic and to oppose proposals to increase it.

The arterial road through Westerham (A25) has pinch points that do not meet the Secretary of State’s defined criteria of a:

‘Classified Road’ (3.65m carriageway width)

It does not, in fact, even meet the requirement for the lowest category - a ‘Residential Street non-bus route’ (2.75m)

(source - Newcastle C.C. government website)

Sevenoaks District Council Core Strategy 2011 identifies 4 priority objectives
- Improving accessibility
- Tackling congestion
- Providing safer roads
- Improving air quality

SDC has determined to bring forward measures to alleviate congestion and tackle air quality issues in Westerham.

**A25 Pinch Points do not meet statutory specifications for trunk roads**

1. Manor House/Lodge Lane crossroads - width of road 4.8 metres
   The road narrows to a severe pinch-point with Grade II listed shops with narrow pavement on the south side and the wall of the Grade II* listed Manor House which abuts the road on the north side. The carriageways at this point are 2.4 metres from centre line to kerb-edge. It is impossible for any other vehicle to pass an LCV or other wide vehicle at this point

![](image1.png)

It is clear that only cars can pass at the pinch-points, not LCVs or HGVs

![](image2.png)
2. Yew Tree Cottage/Monks Way on Vicarage Hill - width of road 4.8 metres

The road suffers a severe pinch-point here due to the proximity of ‘Yew Tree Cottage’ and ‘Monks Way’ opposite (both Grade II listed). The pavement on the north side is so narrow as to be virtually unusable. The carriageways at this point are 2.4 metres from centre line to kerb-edge. It is impossible for any other vehicle to pass an LCV or other wide vehicle at this point.

All taken by Yew Tree Cottage/Monks Way on Vicarage Hill, A25
Pedestrian Safety on pavements

When walking around the town there are several places where the pavement disappears on one side of the road and pedestrians are required to ‘brave the traffic’ as they have no option but to cross to the other side. This is particularly significant for the elderly and disabled, especially if they are visitors and unfamiliar with the town. This applies to both pinch-points and at the top of London Road.

Vicarage Hill residents Malcolm Basing and Irene Pearce have both reported dangerous incidents to KCC in the past. Mr Basing was forced to press himself against the wall to avoid being hit by a LCV coming up the hill which mounted the pavement at speed to avoid colliding with an oncoming lorry. The driver said he did not realise the road was so narrow. Kent County Council said there was nothing they could do to the layout of the junction not least because it was bracketed on both sides by listed buildings. In a similar incident Ms. Pearce was actually hit by a passing vehicle. (see photo below with a LCV mounting pavement against her house)
A25 Sharp Bends and Difficult Junctions

1. Verralls Corner
A notorious bend approaching ninety-degrees, and the scene of some nasty accidents over the years, most recently an HGV skidding on the wet road and colliding with the corner of this terrace of cottages.
2. Quebec Square
A difficult junction of two busy roads with a blind turning eastwards from the B2026 onto the A25. The B2026 is the road to the National Trust property ‘Chartwell’ which welcomes 230,000 visitors per year.

As can be seen the blind turning from the B2026 onto the A25 is a ninety degree junction with severely limited visibility.

The A25 approach to this junction from the east suffers an adverse camber, the scene of many accidents in wet weather where vehicles have hit properties surrounding the junction. In 2012 a large heavy wooden planting-trough was built on the pavement at the junction to protect the old cottages on the south side opposite Quebec House (Grade I listed National Trust property).
Local resident Ray Camlin inspects the damage outside his property. Photo courtesy Sevenoaks Chronicle.

The wooden planter placed in front of Quebec Cottages for protection
3. Junction the Green and Vicarage Hill (Yew Tree Cottage)
There is virtually no pavement by Yew Tree Cottage and vehicles pass very close to this old listed building. In late October 2015 a Supermarket delivery van collided with the building while passing another vehicle at this pinch-point in the road, causing damage to the porch-level roof, guttering and tile-hung wall.

See close-up insert for detail of roof damage

4. London Road junction
The London Rd junction (A233 to Bromley) with the A25 arguably suffers the worst traffic pollution in Westerham, being a T-junction on a hill between high-sided buildings. The road width is 2.5m per carriageway - well below the specified 3.65m per carriageway. There is no pavement on the west side of the A233 where a Grade II listed building abuts the carriageway at the corner with the A25. The east-side has a narrow pavement fronted by another Grade II listed property.

A lorry crosses the white-line to turn into the London Road
The bus from Bromley moves out and crosses the white line to clear the pavement on its turn eastwards to join the A25

5. Croydon Road Junction
The Croydon Road Junction (B2024) normally gives good visibility in both directions, until a large vehicle is turning when visibility is significantly reduced. This is a ninety-degree junction both east and west and high sided vehicles block both carriageways when turning from the B2024 as the junction is just too tight.

It should be noted that both the Croydon and London Roads are used by existing HGV, LGV and LCV traffic travelling to and from south London, Croydon and Bromley. Existing volume of vehicles already has difficulty accessing the A25 through Westerham, using either the A233 or B2024 as shown in the photo above.
Listed Buildings

There are over 140 listed buildings in the parish of Westerham, many of which have little or no foundations. Existing traffic is already having an adverse impact on the setting of our listed buildings.

The setting of our buildings is *influenced by environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. For example, buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each*.

source - the National Planning Policy Framework

Westerham’s Conservation Area Appraisal and Management Plan 2014 describes the town’s character and areas of special interest:

New development should look for ‘...opportunities to enhance the setting of the conservation area’ and should not ‘...harm its significance’

Air Quality

All the pinch-points and junctions so far mentioned are boxed-in by tall buildings, but to date no measurements have been made at the pinch points.

Emissions to the atmosphere of the exhaust from existing traffic along the A25 have already led to the centre of Westerham being declared an Air Quality Management Area (AQMA) for the pollutant Nitrogen Dioxide. Measurements have indicated that the concentration of this pollutant in Westerham have exceeded the criteria set out in
the National Air Quality Strategy. The 2014 measurement in Market Square exceeds objective levels by as much as 25%: the Direct Action (point 9) of the Air Quality Action Plan requires recommendations for suitable traffic-reducing proposals in the centre of Westerham to be made to Sevenoaks Joint Transport Board.

Nitrogen Dioxide is formed by chemical reaction in the atmosphere from Nitrous Oxide which is produced during the combustion process in a vehicle engine and is emitted in the exhaust.

There is clear evidence that Nitrogen Dioxide is harmful to health. The most common outcomes are respiratory symptoms such as shortness of breath and coughing. Nitrogen Dioxide inflames the lining of the lung and reduces immunity to lung infections such as bronchitis. Studies also suggest that the health effects are more pronounced in people with asthma compared to healthy individuals.

The Committee of Medical Effects of Air Pollutants (COMEAP) is to publish detailed research in December 2015, adding to this evidence and the Government is required by the Supreme Court of Justice to produce a plan of action.

The Environment Audit Committee heard evidence on Diesel emissions and air quality on October 27 2015. The subject of M.O.T. Testing for Diesel Emissions was discussed and a comparison against the cost to the N.H.S. of health harm from diesel emissions and indeed the 50,000 deaths p.a. directly attributed across Britain was requested. Deliberate illegal activity from a car manufacturer gave rise to the question of ‘Corporate Manslaughter’.

Clean Air in London (CAL) published (October 2015) an Opinion from Robert McCracken Q.C. which concluded …‘where a development would cause a breach (of the Air Quality Directive 2008/50/EC) in the locality of such development planning authorities must refuse permission; where a development would either make significantly worse an existing breach or significantly delay the achievement of compliance with limit values it must be refused…’

It is evident that the extra traffic resulting from the proposed development would increase the concentration of nitrogen dioxide as well as of other pollutants not only because of the increased number of vehicle movements but also because of the inevitability of more frequent traffic jams. Sevenoaks District Council would be unable to fulfil its existing legal obligation to take action to reduce Nitrogen Dioxide concentrations in Westerham.
An analysis of the presence of local schoolchildren, standing on the roadside during peak traffic times, waiting for buses, exposed in Westerham’s AQMA, during the period July 2013 to July 2015, has been produced, and will continue to be updated.

Nitrogen Dioxide annual objective

<table>
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<th>Site Number</th>
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<th>NO2 annual objective 40ug/m³</th>
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<td>24</td>
<td>DT24: High Street (Well Close)</td>
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<td>34.8/33.2/34.8</td>
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<td>DT25: Vicarage Hill</td>
<td>39.1/39.3/36.1</td>
<td>37.1/35.8/35.8</td>
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<tr>
<td>30</td>
<td>DT30: Market Square</td>
<td>56.7/50.2/55.8</td>
<td>55.8/51.8/55.8</td>
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<tr>
<td>78</td>
<td>DT78: London Road (Antique Shop)</td>
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<td>36.0/39.7/39.7</td>
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</tbody>
</table>

Pollution levels at nominated positions in Westerham

Air Quality Management Areas (AQMA) in Westerham
Pollution Damage to Listed Buildings

Brickwork and ragstone base-work on several old properties shows significant deterioration and erosion caused by sulphur-laden pollutants splashed on the brickwork by close-passing traffic in wet weather.

Yew Tree Cottage, Vicarage Hill, A25

Sustaining the town in an Area of Outstanding Natural Beauty

Westerham is in the heart of an AONB and hosts two significant SSSI. The projected increase in LCV and other regular traffic would be severely damaging to our environment in the impact on houses, the community and the wider Kent AONB. The National Planning Policy Framework directs that development should be restricted in an area of AONB with the presumption of sustainable development being a ‘golden-thread’ running through decision taking. In short, increased traffic flow would undermine the sustainability of Westerham’s character, community and infrastructure.
Economic Development, Café culture and the Green road frontage

The economy of the town is highly dependent on the Café culture which is actively marketed by the Town Partnership as a tourist attraction. The A25 is fronted by the town’s famous ‘Green’ and the statues of General Wolfe (1911) and Winston Churchill (1969). The earliest photo-postcards promoting this spot as ‘somewhere to visit’ date from 1865.

There is a link between traffic and levels of social interaction on the street. A study from University West of England concluded ‘higher levels of motor vehicle traffic were found to have a considerable negative impact on the social and physical environment…’ and ‘...it was significant that residents identified numerous impacts on the practical quality of life within the medium and higher level traffic streets’

source - uwe.ac.uk/15513/1/WTPP Jan 2001

The town’s economic and development strategy has been planned in conjunction with the National Trust at Chartwell and the projected Westerham Valley Farm development. Westerham town centre will be promoted as a destination accompanied by a walking heritage trail supported by smart-phone technology. Increased A25 traffic flow will have a devastating effect on Westerham’s future economy
The A25 runs alongside the Green from London Road A233 junction to the pinch-point at Yew Tree Cottage, top of Vicarage Hill. Community events held here are often spoilt by the proximity of heavy traffic on this busy road

Fragility of Westerham’s road system

Local side-roads were constructed in the era of the horse and cart and are all very narrow. Very few houses in these side-roads have off-street parking or a garage yet home owners today invariably have two or more cars per household.

The M25 between junctions 5 and 6 which are directly north and either-side of the town is considered to be one of the UK motorway system’s worst accident ‘black-spot’ areas. Any diversions necessary are routed via the A25 through Westerham town centre. Any incident at all leads to chaos in the town. To quote the Westerham Village Design Statement, 2001 - ‘a hiccups on the motorway equals a thrombosis in the town’.

On September 21 2015, a fire in an old property near the pinch-point at the Croydon Road junction resulted in road-closure for five days. Drivers of HGVs and LCVs persisted in attempting to use back-roads to the alarm of local residents
After the fire was extinguished, the roof was deemed unsafe and the building in danger of collapse. Scaffolding erected to support the building was deemed so close to the road it could be hit by passing vehicles. Vehicles regularly mount the pavement at this point in order to pass. After five days the road was reopened for one-way traffic with temporary traffic lights until the building was repaired (this took several weeks).

Late 2015 and early 2016 Westerham suffered two traffic related deaths and one severe injury - evidence of danger on Westerham’s roads at existing volumes of traffic.

Stay Safe And Keep In Touch:
www.visitwesterham.org.uk website
Facebook Page Westerham Kent
Twitter @visit_westerham or @westerhambiz
Appendix 2
Response to Roxhill Planning Submission for Moorhouse site – No 2016/1036

Various representatives of Westerham community groups have met with Roxhill personnel prior to their first submission and also now their second application. Roxhill promised to supply information regarding their comparative Bournemouth site after our first meeting (1st application) but then failed to do so despite various phone calls. It then transpired, after we visited the Bournemouth site, that the submission was a complete fabrication. They also said that their Dartford site was a comparable site, which handled 7,000 parcels a day. We understood from that comparison that 100 vehicles were required to deliver 7,000 parcels.

Roxhill personnel requested a meeting with two of the Westerham groups, prior to this 2nd application. Ahead of the meeting a simple question was asked – ‘how many parcels were handled at the new super sites such as Stoke and Dagenham, on the days of the traffic survey’. Neither Roxhill nor DPD representatives gave the answer, either prior to the meeting or at the meeting – they said they did not know. They have subsequently declined to give the information based on commercial confidentiality.

None of the concerns expressed by the Westerham groups have been alleviated, neither at the meeting nor subsequently.

It is such a fundamental question. There are finite resources, an LGV has a given volume and on average must handle ‘x’ amount of parcels. Management must forecast how many parcels they would expect to handle and therefore the numbers of vans and the traffic movement flows from those basic statistics. Roxhill have sought to hide that information from their submission.

The planning application for Stoke (used as a comparator in this 2nd submission) is also instructive- see appendix 1. Current traffic movements, in the first year of operation, are 4 times greater than the DPD’s original submission.

We have been left to estimate how many parcels a DPD/Interlink van normally carries. This statistic is important because the Roxhill submission only states 100 vans, without any qualification as to whether this is the maximum that will ever be used. DPD, on the other hand, have proudly announced on 17th November 2015 that
they have built 4 super sites that can handle at least 25,000 parcels a day.

“The UK’s fastest growing major parcel delivery company DPD has invested £14m developing four new super depots in Cardiff, Dagenham, Exeter and Stoke. Covering at least 60,000 sq ft, each super-depot is double the size of DPD’s standard depot sites, and will be capable of handling 25,000 parcels a day.”

Further they said

The investment will create 170 new jobs this year in a range of roles - including operations and drivers - and each super depot will still have significant capacity to continue growing for years to come.

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.

If we were to use the Roxhill 1st application then 100 vans can handle 7000 parcels a day, and consequently, 25,000 parcels would require 357 LGVs. We have however asked various DPD drivers, around the country, how many parcels do they carry?

Answer 80-120. The same question was asked of the Roxhill team when we suggested each van could handle only around 100 parcels a day. The response was ‘parcels are getting smaller’. The general public might not agree when they see their small Amazon parcel packaged in a larger box so that it is not lost in transit!

The policy of DPD seems to be focussed on customer satisfaction through timed deliveries. This must reduce overall delivery capacity of each van. Rather than fully loading the vehicle, the timed deliver pattern takes priority so there must be a requirement to increase the number of vans.

To evaluate the Roxhill information we have used the following statistics

1. The capacity of Moorhouse is to handle 25,000 parcels in the short term but that will increase significantly in the future (see DPD’s PR release above)
2. Each LGV can handle 100 parcels hence 25,000 parcels require 250 vans.
3. Each van creates 4 traffic movements, mainly at rush hour periods. We have examined the traffic movement at the new Stoke depot and extrapolated that movement to create our own picture of traffic through Oxted and Westerham.
4. We have looked at the postcodes to be supplied from the Moorhouse depot and weighted the travel potential based on population. It shows 59% of the LGV traffic movement will be through Westerham and 41% through Oxted (see sheet 2 of attached spreadsheet)
5. We ran our own traffic survey at Moorhouse on 30th June 2016 between 6am and 8pm. We found that the number of HGVs had significantly decreased from the
Roxhill survey of 2014. In 2014 there were two golf courses accepting a large amount of landfill, to create new golfing areas. To reflect this situation we have created a hybrid traffic analysis which uses Roxhill’s cars and LGVs but our HGVs. The total number of vehicles happens to be in line with the government survey carried out over a period of years, 9,500 vehicle movements per day.

The significance of the parcels per van cannot be overstressed; as the parcel capacity of the Moorhouse increases there must be a corresponding increase in LGVs. Although, as both the Dagenham and particularly the Stoke site show, they were using approximately 98 LGVs at the time of the traffic count, we have no information as to how many parcels were being handled and whether there will be a future gradual build up of vehicles to handle the 25,000 parcel target.

What we do know from the Stoke analysis is that the vans arrive on site to load up, between 5 and 8 am and the majority (96%) leave with their parcels between 7.30 and 9.30 am. They arrive back on site between 2 pm and 7 pm but 60% arrive between 4 pm and 6 pm. They then leave shortly afterwards, having unloaded. Every LGV creates 4 traffic movements with the majority of those movements within the 7.30-9.30 am and the 4-6 pm rush hour periods. This will add to the existing congestion through the two pinch points in Westerham and the Kent Hatch road junction in Limpsfield. It will impact seriously on parents and the children being dropped off at Limpsfield School.

Our analysis shows that Eastbound traffic through Westerham would increase dramatically in the morning rush hours at between 14- 35%. Westbound traffic increases through Oxted are less dramatic but still between 10-15%. Afternoon and evening traffic is 14-17% for Westerham and 17-22% for Oxted (see attached spreadsheet page 1 and table below).
It should also be noted than half of the LGVs need to cross to the far lane of the A25, a large proportion of those 500 dangerous manoeuvres against a traffic flow averaging 900+ vehicles an hour during the peak 2 hour periods.

The Roxhill application argues that Moorhouse should be allowed to return to the Historical 1989 traffic levels when the site was fully operational. They quote traffic movement of 862 vehicles per day whereas their current projection for 2016 is only 948 vehicles; therefore the 10% increase is acceptable. Unfortunately that does not take into account our projections of 250 LGVs rather than their 100. Our projection for traffic using Moorhouse site is 1548 (1000 LGV movements rather than their 400 projection). This would result in an 80% increase in traffic from 1989 and a 350% increase in traffic.

<table>
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<td>369</td>
<td>15%</td>
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increase over current levels.

If our analysis of the potential number of LGVs is correct then the effect on traffic in Westerham and the surrounding areas would be totally unacceptable.

We must also look at the future parcel handling capacity for Moorhouse. Roxhill have stated that adjacent DPD depots are running at full capacity. Dartford was extended less than two years ago, to handle 7,000 parcels. Last year it was handling 10,000 parcels a day, so we can assume that that is the minimum currently being handled, but it could be up to 15,000 a day. DPD has said that the Moorhouse super site will be 4 times more efficient. So the potential parcel handling capacity would be 40,000 at a minimum and may be 50-60,000 parcels. LGV requirement would rise proportionately. So we must allow for a minimum 1,600 van movements rather than the 400 estimated in Roxhill’s 2nd application.

Both Dagenham and particularly Stoke are contiguous to dual carriageways and any overrun of initial traffic estimates has little impact on the surrounding areas. Moorhouse is poorly located, any increase in traffic from the site would have severe adverse effects on Westerham. We suggest that the 400 LGV movements in the application is plainly under-estimated, the effect of potentially 1600 movements would cause traffic chaos through Westerham’s narrow A25.

A far better solution for all communities is that Moorhouse is re-designated for housing, it would require a change in Tandridge Local Plan but is the most desirable solution for all.

Peter Cashmore

Westerham Residents Association 18-7-16