

Westerham Residents Association posted the following objections on the Tandridge planning website for the Moorhouse application.

on 23rd September 2015

Dear Mr Blake

We note your quick response to the Westerham Town Partnership so I am sure that the answers you and your team promised at our meeting on Monday evening will also be forthcoming soon.

We asked a number of questions including catchment area for deliveries, parcel throughput for Bournemouth and these were particularly designed to find whether your designated comparative site (Bournemouth) would be a true guide as to the traffic model for Westerham. It appeared to come as news to you that DPD/Geopost had recently invested in their Dartford depot to increase throughput from 2000 to 8000 parcels a day. Dartford is significantly smaller than the site intended for DPD at Moorhouse so it is natural for us to assume that Bournemouth must be handling 12000 parcels a day, if the Dartford warehouse size is any guide.

It is obviously worrying to us that a site (Dartford) could expand by 400% with no apparent increase in warehouse size, simply an investment in handling facilities. How can the planning department at Tandridge factor in such a potentially large increase in vehicle movements?

The following morning I asked another question of Richard McCulloch, your Transport Consultant. "Was it reasonable to take the Geopost figures for traffic and proportion that up for whole B8 site"? This would naturally assume that Moorhouse would become a distribution centre for other companies. He agreed that I could make that aggregation but that there may be some consolidation of HGV traffic.

On the Monday evening you repeated many times that "distribution was a soft option for Westerham" despite the fact that most of the lorry movements would take place throughout the night and early morning. It is also obvious from your website that Roxhill are developers of land/sites for the Distribution Industry. Your website names some of your clients as Amazon, DHL, Hermes so it would be the "soft option" for Roxhill to sell the B8 site to your existing clients.

Mr McCulloch promised to come back to me on the Bournemouth throughput. You may have already supplied this information to Tandridge but can you release this information to us as well?

Kind regards

Peter Cashmore
Westerham Residents Association

On 7th October 2015

Dear Ms Parker

As you are no doubt aware, there has been no response from Mr Blake of Roxhill to our previous email concerning the comparator site of Bournemouth nor any comment on the potential for the whole B8 site to be leased to other Express Delivery/Transport companies, which would appear to be Roxhill's stated 'soft option'.

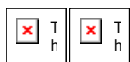
We also referred in that email, to the Geopost/DPD expansion in Dartford that quadrupled its parcel handling capacity from 2000 to 8000 parcels a day with no apparent increase in warehouse size. This DPD expansion was reported on the 'Post and Parcel' news website, dated 29th October 2014. It is obviously of great concern to us that a depot can expand at such a rate, which must therefore result in a proportionate increase in the number of vehicles.

Due to this lack of further information from Roxhill, we then analysed the application transport figures in more detail, to test whether the conclusions within the transport section were reliable and true. It is obvious that a developer will put in minimum initial estimates but we have found that many of the assumptions within the supplied tables are dangerously misleading and wrong.

To illustrate these misleading statements we need to refer to two tables in particular - 4 & 5 from the Transport Assessment section 1 and a clause 4.7 from that same section.

Clause 4.7 states there will be 100 vehicle in and 100 out from the site, with the majority leaving between 7am and 9.30am.

We are also aware that there would be two shifts of warehouse staff working 4.00am to 8.30am and 16.00 to 19.30. We have taken employment statistics from page 22 of Section 3 of the Transport Assessment, in particular the note concerning 32 warehouse staff working the shift system. We have assumed that it is 32 per shift due to lack of further information.



Extracts of Appendix L are used to suggest the likely movement of traffic from the site during the morning rush hour (our analysis model is at the end of this objection).

The resulting table for **early morning departures** is

	Geopost figures	Our suggested	Warehouse staff	Total Geopost
	departures	delivery vans only	departures	departures
06.00-07.00		4		4
07.00-08.00		23		23
08.00-09.00	19	50	24	74
09.00-10.00		23	8	31
Total		100	32	132

The above table does not include traffic entering the site - it is simply an assessment of outgoing traffic joining A25. It is impossible to move 100 vans and all the shift staff off-site over a 2.5-hour period if the maximum departure is 19, as stated by Roxhill within the transport analysis. Shift staff themselves, finishing at 8.30am would account for more than that level of vehicle movement.

We estimate 74 vehicles leaving rather than 19, during the morning rush hour.

The above figures are based on a 100 van operation. The site is built to accommodate 151 vans so the above figures would increase by a further 51% for a full DPD site operation – resulting in an 8-9 am slot vehicle movement of **112 vehicles joining A25 from Moorhouse.**

Again due to the non-response of Roxhill, we assume they are in agreement that the whole of the B8 site could be utilised by their other delivery clients. We have expanded the above results by a factor of 3.75 to account for the adjacent 3 warehouses being used for the same type of operation.

This would result in the traffic level joining the A25 at the morning rush hour period increasing to 419 vehicles, nearly a 45% increase in traffic on A25 (surveyed at 943 vehicle movements from Roxhill’s report).

Both this level, and even the DPD level of traffic movement, during the morning rush hour can only be described as unacceptable. It bears no relation to supposed 2% increase in traffic proposed by Roxhill.

We have also used the same reasoning for our analysis of the Total Traffic movements. We have increased Roxhill’s overall traffic flow from the site by 51% to allow for full use of the DPD site and then we have used the TRICS data from table 4 to calculate the potential increase in traffic if the rest of the site were transport related.

It should also be noted that the majority of the HGV movement take place during the night and early morning so the actual increase in traffic between 11pm and 6am is over 400%.

The total traffic movement increase could be as high as 2216 vehicles per day, an increase of 24% over the Government census statistics which have averaged 9286 vehicle movements over the last 5 years.

Transport report conclusions		Total	HGV's	Light Vans	
Consultants Suggestion 2015/2020	from full site 20958 sq m	394	126	268	Majority HGV movements overnight
Our Conclusions					
Geopost site would generate (see table 5 Transport assessment)	5595 sq m	520	26	494	Equivalent to Geopost Bournemouth site
If full Geopost site using 151 vans then increase above by 51%		785	40	745	
Rest of B8 site (using table 4)	15363 sq m	1431	118	1313	
Total Traffic (generated by full site)	20958 sq m	2216	158	2058	All extra lorry movements at night and early morning
					21 lorries per hour over 7 hours period
2014 October Survey commissioned by Consultants		All Traffic	HGV's	11 pm-6 am	
over 5 weekdays daily movements	Eastbound/Westerham	6088	816	30.8	
	Westbound/Oxted	5213	156	3.2	
		11301		34	
Government census figures	5 year average	9286			
Increase in traffic potentially	2216/9286 All traffic change	24%	158/34 HGV change	465%	

Conclusion

The statement by Roxhill that traffic would only increase by 2% cannot be supported by their own submissions. In assessing potential traffic movements it is necessary to assess the impact of the Geopost site working at full capacity and also the effect of the whole B8 site being used by Amazon, DHL Hermes etc, all major clients of Roxhill.

We suggest that the total traffic increase could be 24% and the overnight HGV movements increase by 465%. Even the morning traffic estimates for the sole Geopostsite are grossly understated at 19 vehicles compared with our assessment of 74, possibly rising to 112.

Peter Cashmore

Westerham Residents Association

Appendix L analysis

We have used Appendix L page 4 & 5 as an indication of the traffic movements from and to the site. While the chart indicates traffic between 7.45 and 9.15 we have tried to extrapolate traffic for the time 6.00 to 10.00am. The resultant delivery van traffic is 4,23,50,23 for each hour between 6am and 10am.

Traffic analysis from AppendixL											
Time segment	06.00-07.00	07.00-07.30	07.30-07.45	07.45-08.00	08.00-08.15	08.15-08.30	08.30-08.45	08.45-09.00	09.00-09.15	09.15-09.30	09.30-10.00
Roxhill				432	516	633	633	516	432		
Allow intergers				4	5	6	6	5	4		
Infer traffic	2	2	4							4	2
Estimate	2	2	4	4	5	6	6	5	4	4	2
From above	06.00-07.00	07.00-08.00	08.00-09.00	09.00-10.00	Total						
	2	10	22	10	44						
% traffic	4.6%	22.7%	50.0%	22.7%							

On 19th October 2015

Dear Ms Parker

We made a presentation of our transport analysis, previously submitted to you, at a Westerham Town Meeting on 13th October. We are very conscious that we only had the various tables, such as 4 & 5, in order to extract and correlate information.

Roxhill referred to the Bournemouth site as being a direct comparison to the Moorhouse application yet only used that correlation, possibly, in Table 5 and this was only to show that HGV traffic would be lower than the TRICS data (Table 4) would suggest.

Why did Roxhill not submit the 7.30 to 9.30 actual data of van/vehicle movement from Bournemouth? Instead they used data to infer 19 vans leaving at the peak travel time of 8-9 am, very similar to TRICs data but not in line with the 100 vans leaving in Roxhill's 2.5 hour target.

We had to submit alternative figures by extrapolation and inference from their submission. So we arrived at 74 vehicles leaving the site between 8 & 9 (see previous objection 7th October) and if unit 1 was at full capacity, we suggested 112 vehicles leaving. Again using Roxhill's own traffic survey, the report found an average of 943 traffic movements along the A25 at this critical time.

So the real question is, can 112 vehicles joining a stream of 943 (12%) be classed as excessive? It is certainly not the 2-3% as stated by Roxhill.

It would obviously be totally unacceptable if the whole of the B8 site were used for distribution because the traffic movement leaving the site would then be 419 vehicles into a stream of 943.

We would suggest that Roxhill be asked to re-submit its application based on real, verified traffic movements from its Bournemouth site and further to show whether that site is a true comparison based on size, parcel handling quantity and vans employed.

It should also be noted that DPD have just introduced a new idea to some of its sites - called ParcelLock, it will create even more traffic than that suggested in the application. ParcelLock seeks to offer other distribution companies and supermarkets the ability to store and distribute goods at the DPD site using their own transport. Yet another reason why the transport analysis needs revisiting and revising

On 20th November 2015

Dear Ms Parker

Is the 17/11/2015 technical note by the applicant meant to be a serious, credible and professional answer to the queries raised by 'third parties'? They have been given both the time and the opportunity to totally refute the arguments made by opponents of the planning application but rather than a tight rigorous argument they have resorted to generalisations.

Firstly, we have the admission, para 5.2, that the comparator site of Bournemouth was really a fairy tale, a site that DPD thought they might need in the future, but sorry, it is not going to be as large as they estimated and more importantly, is (when built, site not found yet) only

going to be half the size of Moorhouse, so forget the comparison, the traffic figures were fictitious. But it was DPD's fault because they gave the consultants wrong information.

Secondly, we are asked to accept a comparison with a site possibly Norwood and accept TRICS data, rather than hard facts from a survey. We again must believe the consultants that there really will be only 19 vans between [8-9 am](#). Rather than deal with 'third party' estimates of traffic estimates, they say with certainty that vans travel [between 7.30 am and 19.30](#). The Transport consultants ignore their previous statement that 100 vans travel out between 7.30 & [9.30 am](#). They carefully ignore our analysis that says we can expect a minimum of 112 vehicles if the site is fully utilised, so we have to assume **they must agree with our analysis**.

Thirdly, they agree that there will be extra morning traffic (which they have not assessed nor included in their original application) due to staff and employees car movements but have not disputed the third party estimate. Yet again this supports our 112 vehicles during the morning rush hour.

Fourthly, the consultants ask us to ignore that the applicant is building a site to accommodate 151 vans, the extra capacity we are told is to allow for breakdowns and renewals. Also please ignore that there are 104 staff car park spaces that may not be fully utilised and 19 HGV spaces that could be used for maintenance of vans. Does their argument have any shred of believability?

Fifthly, the applicant was asked to estimate of potential van movement in the local area, both East and West of Moorhouse. Page 5 of their technical note is supposedly a rigorous view of the travel movement, showing 40% travelling east through Westerham and 60% west through Oxted. Tables 2&3 on page 5, show approx. 4000 deliveries per day around the area, equivalent to 40 vans rather than the 100 or 151 vans of the application. The parcels and their supply depots shown in the table actually appear to be mainly Kent based. Any rational estimate of traffic movement from their figures would actually show the complete opposite of their assertions, 67% of the traffic from Moorhouse will travel east through Westerham rather than their fairytale 40% (see analysis below). Their report may have had more credibility if they had used demographics to show the population density of the target areas, alternatively the consultants may argue that the 4000 deliveries are only 40% of the total potential traffic and is not truly indicative of the final dynamic situation. *TN16/TN14 shows 2329 supplied by Dartford and Crayford, TN8 with 945 supplied equally by Maidstone and East Grinstead and 942 supplied from Surrey area. Hence 67% (2801) from Kent and 33% (1414) from Surrey.*

Are we able to accept any of this new commentary when there is such faulty analysis and 'apologies' for fairytale sites and such oversupply of parking spaces for vehicle maintenance and 'dynamic routing'.

Yours sincerely

Peter Cashmore

Westerham Residents Association