

**From:** Lesley Westphal  
**Sent:** 29 October 2018 13:45  
**To:** comaps  
**Subject:** FW: Planning Application Number 2018/1792



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**From:** Marie Brace [REDACTED]  
**Sent:** 22 October 2018 13:07  
**To:** Lesley Westphal  
**Subject:** Planning Application Number 2018/1792

1. The building proposed for DPD's use for a super depot is **exactly the same size** as in previous applications. The claimed reduction in size of the development is purely because the additional buildings include in previous applications have been omitted. Once planning granted on this Depot it will only be a matter of time before an application is submitted for these other buildings.
2. **Our Roads can't cope with the extra traffic this Super Depot would generate. The numbers on which Roxhill have based their traffic movements are HUGELY UNDERESTIMATED.** Our forecasts for future traffic movements remain close to **2,000 Extra LGV & HGV movements a day by 2023 at the very least.** This is with a very conservative growth rate of 10% suggested by DPD. They claim the development will only '*mildly increase traffic through the local road network*', but the figures they have used for parcels handled in a 'typical day', in 'seasonal peaks' and due to 'company growth' are hugely underestimated. We believe their numbers need to be seriously challenged. (see analysis and comments of traffic numbers on next page)
3. Comparison with other DPD sites shows that they have grown after they have opened, and once permission for a depot is given, there is **no control over traffic growth.** We believe that the capacity that the depot can handle is far greater than what the application is suggesting, we have found interesting information that supports this fact.
4. The site is **within the Green Belt.** Development in the Green Belt must meet the test of 'very special circumstances' Whether exceptional circumstances exist or not is a judgement call by Local Authority which a **Planning Inspector** will review, endorse, modify or reject.  
**The Roxhill case for exceptional circumstances is weak.**
5. Tandridge District Council's proposal to remove the site from the Green Belt in their emerging Local Plan **has not yet been examined and approved by the Planning Inspector** who may not agree

this proposal.

TDC are obliged to **investigate reasonable options** before proposing a change in Green Belt boundaries. Has TDC investigated other options rigorously?.

6. The site is within **the Surrey Hills Area of Outstanding Natural Beauty**. AONBs have the highest level of legal protection from development, which was strengthened in the new Planning Policy (NPPF) issued this year.

Any development must demonstrate that the benefit it brings far outweighs the harm it does. **The DPD proposal is contrary to the Surrey Hills AONB Management Plan** and the AONB Unit objects to it. (more information on this argument in another paragraph)

7. It is a **remote and unsustainable location**. 2 miles along the A25 from Oxted and 1.5 miles from Westerham, there is no public transport option for those working at the site and no nearby facilities. 70% of the jobs created are for delivery drivers who are likely to be recruited from Croydon, East Grinstead, Redhill and Crawley and in the majority of cases will be franchisees.

### **New evidence which reveals the true threat of this application:**

**We believe that the estimated total volume of activity for this site is wholly inaccurate compared to DPDs sites of a similar scale**

- When comparing another recently built DPD site in Glasgow of 6527 sq. metres (70,363 sq.ft), DPD say it can handle 45,000 parcels per day. The Glasgow site is only 16% larger than the application but supposedly can handle 80% more.
- In 2016 DPD claimed that they were opening a site in Dartford that could handle 10,000 parcels a day. It actually handled a maximum of 21,927 parcels.
- They claim on a typical day they will deliver 17,317 parcels using 137 vehicles. Basis for this is no. of parcels delivered on 14 Feb 2017 to postcodes which will be served from Moorhouse. The seasonal peak (leading up to Christmas) they claim will be 25,000 parcels using 178 LGVs. The future expansion has been quoted at 30,000 parcels using 200 LGVs. Most of the statistics within the application are based on 2016 results. DPD expanded by 11% in 2017 and have recently commissioned a sorting plant in Hinckley which will increase their capacity by 60% by 2020, the likely time that Moorhouse would come on stream.
- It is worth comparing Cardiff, Dagenham and Dunstable parcel levels for a comparable period in 2016. We have compared an average week in February for all three sites against the average weekly number of parcels for a 5 week period in November and December 2016 . An average increase for all of 102.2%. The seasonal max for Moorhouse on a pro-rata basis should be 35,015 parcels and not 25,000

**The reality of traffic levels with seasonal considerations compared to Roxhill's hugely underestimated claims**

- The estimated number of LGVs for Moorhouse is massively understated from the 'Get-Go'. The developer claims 17,317 parcels will only require 137 vans whereas if you use the company average of 113.6 parcels per van, it actually requires 152 vans.
- Their estimate becomes even worse when you consider the Seasonal level of 25,000 parcels. They say 178 vans, yet at 113.6 ppv, it means they would require 220 LGVs. We estimate that our suggested seasonal max of 35015 parcels would require 308 vans as against their seasonal max of 178 LGVs.
- All of Roxhill statistics are based on what happens during the rush hour periods of 8-9am and 5-6pm. The number of vans quoted is not only inaccurate because of load capacity (113.6

ppv) but also they have not used comparable exit figures to their quoted sites of Cardiff, Dagenham and Dunstable. In the morning rush hour Cardiff experiences 65.4% of all LGVs leaving on their delivery rounds. Our own analysis for Stoke for the 2016 application showed 60% exited during the morning rush hour.

- Roxhill have shown a combined table for their three sites which shows 57.1% of vehicles leaving during the morning rush hour. Yet for the Moorhouse application they use a morning rush level of 38.7%.
- In 2023 using their growth figure of 20% (very conservative given DPD's expansion of 11% in 2017 and 25% a year between 2011-2016) the handling capacity could be 42,000 parcels which would mean 370 LGV's arriving at the site every morning and then returning in the afternoon. **All traffic movements HGV's, LGV's and employee cars combined would add up to 2,000 traffic movements a day!**
- Can the Moorhouse site handle 42,000 parcels or more. It has the internal capacity - an additional conveyor or increased working time would allow that. Why would a business construct a building that was at full capacity from day 1.

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**This application breaches Tandridge District Council's own planning policy and The National Planning Policy Framework [NPPF] in the protection of the Green Belt**

- **The District's own Core Strategy** in policy CSP 20 follows this theme very appropriately saying, "the first principle to be followed is to conserve and enhance the special landscape character, heritage, distinctiveness and sense of place of the locality." Policy CSP 21 follows and deals with Landscape and Countryside saying that the character and distinctiveness of the District's landscape and countryside should be protected for its own sake. This is backed up by the Surrey Hills Management Plan which in policies LU1, LU2 and LU3 seeks to protect the amenity, landscape and scenic beauty of the AONB, and secure high quality design of new buildings.
- **The National Planning Policy Framework [NPPF]** which was issued in a revised form in July this year, is the Government's planning guidance for all Local Planning Authorities. It is quite clear in relation to proposed development in an AONB. At paragraph 172 it states, "great weight should be given to preserving and enhancing landscape and scenic beauty in .... Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues".