APPLICATION 2018/1792 - MOORHOUSE PARCELS DEPOT

1. We wish to object to this application which is the third time Roxhill have applied for a super regional parcels depot at this location. The reasons it was rejected previously remain. The application is for a regional super depot which is unchanged in size, capacity and impact, and it constitutes development contrary to existing planning policies for an AONB and a Green Belt site.

2. Proposal conflicts with Tandridge’s Green Belt & AONB Policies
2.1 The Roxhill proposal does not meet the tests of special or exceptional circumstances to justify development in Green Belt or in AONB. We already have good parcel services locally provided by a number of companies. So there is no overriding necessity for a super regional parcel depot at this particular location and there is no proof that alternative and more sustainable sites do not exist.

2.2 The proposed parcels building is massive (5950 sqm & 10.8m or 4 storey high) and its scale will have a permanent impact on the environment and would be an inappropriate intrusion on the Surrey Hills AONB, being visible from the North Downs Way and nearby dwellings. The NPPF refers to the requirement for new development in AONB to protect future and existing residents. Such development would be in conflict with TDC’s Core Strategy which refers to the need to conserve and enhance the special landscape character in designated and protected areas and neither has the applicant shown that the benefit of development outweighs the harm caused.

3. Inadequate Infrastructure for Regional Depot
3.1 The site is isolated with minimal public transport for staff who will have to use private transport thereby increasing traffic flows. The applicants themselves have implied new staff will mainly come from Croydon, Bromley, Crawley, East Grinstead and Redhill (see page 85) so few jobs will be given locally.

3.2 The site does not have good access to motorway and strategic road networks so the high extra volumes of commercial vehicles will increase traffic on the A25. This road already suffers from congestion at rush hour, especially when the M25 traffic is disrupted, when the A25 becomes pretty stationary from the A21 junction to Junction 6 on the A22 /M25 intersection. The A25 is narrow and well below national standard in several villages. Queues and standing traffic are a regular experience with high volumes of commuters, service vehicles, commercial traffic, school and public transport, inadequate residents parking and increasing quarry based traffic. It would help the local economy and communities to solve existing problems of inadequate infrastructure rather than add unsustainable development of this kind and scale, which will have detrimental effects over a wide area.
4. Area to be served by Moorhouse Parcel Depot
4.1 Although the same size 5950 m2 distribution centre has been proposed in each application with a nominal design capacity 25,000 parcels a day, the proposed post codes to be served have varied from 40 with a rough population of 900,000 (June '16), to 50 with c. 1,900,000 (September '16) and now 20 with c. 350,000 (August '18).

4.2 Once the plant is in operation, DPD in response to market demand will be able to vary the area to be served at any time without reference to the planning authorities and there will be no redress. As the post codes to be served have changed considerably in each Roxhill application, this is a warning we may not really know at this stage the future distribution areas, subsequent routing or numbers of delivery vans.

5. Questions on Traffic Predictions
5.1 In addition to uncertainties on which areas will be served there are questions on the predicted traffic generated by the super depot. The objective of these predictions should be to examine not just normal operation but importantly the potential high volume traffic and worst case scenarios and their impact on the A25 and its communities. Has the methodology used in the Transport Assessment shown what could be the maximum potential impact?

5.2 The application uses 17,317 parcels a day and is described as a typical but “high end” day in February, which is sensible if we are trying to assess maximum impact scenarios. Appendix O sets out in detail actual daily parcels delivered from three depots for a full year in 2016. It shows there were no discernible blips mid February and the seasonal factor averaging February to December daily parcels was 1.9. This is higher than the factor of 1.44 (25,000 over 17,317) given in the Application which should be revised as it may underplay the number of vans needed in high season. Graphs 6.7, 6.8 & 6.9 confirm the seasonal uplift as 1.9.

5.3 The applicants claim that the maximum growth of the depot is only 20% equating to 30,000 parcels a day (over an unknown number of years). However their worst case scenario of 30,000 parcels a day, which is used in the Application, appears unambitious and rather inconsistent with the aims of the company and the actual parcels growth within DPD. Graph 4.1 page 29 shows DPD parcels growth to be about 200% every 5 years or 20% growth every year.

5.4 Previously we have been told that the parcels per van can range widely and that in the last application 100 parcels a van was used as a guide. One key limiting factor must be the number of hours a driver can work so in rural areas with customers further apart less calls and deliveries can be made in the working day than in compact urban areas. So if the company average is 113.6 parcels per van one would expect the average in a large rural area, such as Moorhouse’s stated post codes, would be less than 113.6. But looking at the TA’s three scenarios in Table 7.2 (typical), 7.7 (high season) and 7.10 (maximum capacity) the applicants have assumed respectively 126.4, 140.4 and 150 parcels per van. Obviously such an approach reduces considerably the predicted number of vans needed on those days.

5.5 The applicants have implied in Table 7.2 that 38.7% of the delivery vans will leave the depot between 8 and 9am. But this can also be questioned by looking at Tables 6.3, 6.5 and 6.7 where for three different existing depots the percentages of delivery trips leaving between 8 and 9am appear to be 73%, 49% and 55% respectively.
(5.5 Contd) Analysis of Appendix L data for three depots confirms that 38.7% is low as the average for several depots is 50% with some well above; presumably drivers want to get on with their schedule as soon as they can. But it is important to use realistic data when assessing the impact of these delivery vans on the A25 during rush hour.

6. Unacceptable Traffic Impact of Depot on A25 Communities
6.1 It appears that the application may be underplaying the potential impact of the extra traffic that can be generated by this parcels depot. Using the conclusions above a worrying worst case scenario model can be modelled.

6.2 Starting with their declared 17,317 parcels a day for Moorhouse, increasing this by the seasonal factor 1.9 and assuming a very modest 5% growth each year, the throughput could after 5 years be 39,993 parcels a day in high season.

6.3 Assuming 113.6 parcels per van the number of vans needed will be 352 which will access the site in the morning, then leave loaded with parcels, return late afternoon with collections and then go home thus generating 1408 movements. To this other movements from the Moorhouse site can be estimated and added; including c. 72 HGV parcel movements, c. 200 for DPD other staff, c. 255 for existing sandpit and Redlands traffic and say 100 each for the two new units yet to be developed. This makes a total of 2,135 movements a day coming onto the A25 in high season from the Moorhouse site.

6.4 Evidence shows that 50% of the delivery vans leave between 8 and 9am. So even ignoring additional DPD HGV and staff vehicles movements in that hour, there will be an extra 176 two way traffic movements (delivery vans) accessing the A25 during this peak morning rush hour, which is far higher than their claim in “Summary” 10.8.1.

6.5 With 77% of the van delivery traffic turning eastwards, as stated in the application, traffic flow through Westerham between 8 and 9am will increase by about almost third bringing the historic town with its inadequate streets to a halt. If the growth of parcels is higher than 5% per year and the parcels per van for mainly rural areas falls below the company average, this unacceptable scenario will be even more intolerable.

6.6 These estimates using data from DPD, although alarming, are not unreasonable exaggerations. Referring to the applicants own figures for plant capacity in Table 4.1 we can see that for 5.5 hrs sorting the centre, when built, can provide at “typical capacity” of 5,200 p/hr or at “maximum capacity” 6,500 p/hr ie 28,600 or 35,750 p/day respectively. These capacity figures show that the application’s own maximum of 30,000 parcels per day should be questioned as the application’s worst case scenario.

6.7 And parcels growth could be even higher. To meet increases in demand, output can be increased by extending times of operation with an extra shift and with higher growth the facilities and equipment can be improved.

7. Summary & Comparison
7.1 The Application states the depot’s maximum output as 30,000 p/d and assumes a high van load of 150 p/van thus requiring only 200 vans as per Table 7.10, which is difficult to understand as this means delivering a parcel every 3 minutes throughout an 8 hour working day in a large rural area. Using the safer company average of 113.6 parcels per van this volume of parcels would need at least 264 vans, but possibly more.
7.2 Using the depot's maximum potential capacity of up to 35,750 p/d (as per Table 4.1) an even higher number (315) of vans would be needed. Further by using external DPD data (as above in 6) with a 5% pa growth over 5 years a worst case throughput of 39,993 p/d can modelled requiring 352 vans a day.

7.3 In summary the applicant's stated maximum van requirement is just 63% of their own potential maximum capacity figures, assuming company average van loads, and about 57% of a worse case scenario assuming a low growth of 5% pa over 5 years and using data from other DPD depots.

8. Conclusion
8.1 This proposal for a super regional depot is totally inappropriate in this protected and sensitive location. It contravenes local and national planning guidelines and policies which the Planning Authority is committed to uphold. We already have a good parcels' service in the area so there is no overriding need or exceptional circumstances necessitating a super depot here.

8.2 The regional model of a huge depot in rural areas is detrimental environmentally and should be challenged by Councils in their strategies; serving the same area and delivering the same number of parcels from 4 smaller units will save 50% on commercial vehicle miles travelled with major reductions in congestion and pollution. If we need more parcel delivery capacity, which is not yet apparent locally, we should encourage smaller centres particularly in rural areas with poor road networks.

8.3 It seems that the applicants have underplayed the traffic impact of the development. They may respond to claims that DPD experience elsewhere has not been taken into account including seasonal uplifts, growth, departure times and selective use of parcels per van. But they can only respond with another illustrative model because we do not really know how it will operate, which areas will be served, how it will grow and adapt to demand and changes in company strategy.

8.4 With just modest growth the impact on the A25 and its communities will be severe. There will be gridlock and a reduction in air quality in the narrow roads of Westerham, Brasted and Sundridge and increased congestion in the Limpsfield and Oxted area. The health and well being of communities will be affected and there will severe disruption to commercial activity, schools & school buses, commuters, tourism and visitors along the A25 corridor, affecting not just local people but many thousands from Kent and Surrey who depend on the A25.

8.5 The key issue is that regardless of any "moderated" operational model that is offered in mitigation by the applicant, a plant of this size has the potential to generate overwhelming additional traffic which because it is in the wrong location will harm the local economy and because of that it should not be consented.

Yours sincerely

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