From: Westerham Town Council [mailto:office@westerhamtowncouncil.gov.uk]
Sent: 11 January 2019 13:36
To: Lesley Westphal
Subject: Re: Moorhouse DPD application

Dear Lesley

Thank you for the response to our queries provided to you by i-Transport which you forwarded to us on 21 December. While we appreciate the speed with which these responses were given, there are some aspects which are incomprehensible to us. We are sorry to take up more of your time, but feel it important that, as an area likely to be greatly affected by this proposed development, we understand fully the data supplied by the applicant.

1. We do not understand the references in the responses to 'Point 5; Point 6; Point 7'. As there are no points 5, 6 or 7 in the email we sent to you on 19 December, we are at a loss to understand what these responses refer to.

2. more importantly, the answer to our query on the daily figure of 17,317 parcels delivered into the proposed delivery area, the figure on which all the calculations within the application are based, has not been adequately answered.

While we understand that these are figures provided to i-Transport by Roxhill, we would ask that these be queried on the following bases:

1. it was acknowledged that these figures were on the high side, purportedly due to the day being Valentines Day. However we would point out that **such a 'spike' does not occur in the data from any of the comparator sites, nor are there such spikes on the adjacent days in those comparator sites.**
   We do not believe that the proposed area can be any more observant of Valentines Day than were the comparator areas.

2. The proposed delivery area covers a population of **342,509** (2011 census figures). The applicant states that on 14 February 2017 17,317 parcels were delivered into that proposed delivery area.

   The Cardiff depot delivery area covers an estimated population of **1.1m**, and on 15 February 2016 delivered **8,230 parcels** into its area: this equates to **48%** of the number
claimed for Moorhouse, yet its population is between 3 and 4 times larger.

The Dagenham depot delivery area covers an estimated population of 1.8m, and on 15 February 2016 delivered 11,557 parcels into its area; this equates to 67% of the number claimed for Moorhouse, yet its population is between 5 and 6 times larger.

3. The total number of parcels delivered into the proposed Moorhouse area in 2016 was 1,287,516; this equates to an average of 3.76 parcels per person per year.

Taking a base figure of 17,317 parcels per day, the annual number delivered into the proposed Moorhouse area in 2017 would be in the region of 4.9m per year, (17,317 x 5.5 delivery days per week x 52 weeks per year) giving an average of around 14 parcels per person per year.

Bearing in mind that a proportion of that population will be below the age at which on line ordering is usual, the average parcels per person per year would be higher. It should also be recollected that DPD is only one of the many delivery firms operating in this area.

4. While parcels may well have increased between 2016 and 2017, an increase of this magnitude would be hard to believe

You will understand why these anomalies cause us to challenge the base figure of 17,317. Should this be erroneous in any way, then there would be consequential effects on for example the expansion of the delivery area with resulting effect on the traffic patterns and frequency.

We would suggest that I-Transport be asked to verify with their clients the accuracy of their figures and also to supply data from other days in February 2017. This issue should be resolved before the application goes to the Planning Committee, which we understand now not likely to be before the February meeting.

3. While this email focuses on the parcel number/related traffic issues, we would reiterate our previous objection that the site is within the Green Belt and AONB, and no 'exceptional circumstances' have been put forward to justify such a development. Nor can the site be withdrawn from the Green Belt except through the Local Plan process, which has not yet been completed. The proposal fails to comply with NPPF, and the Surrey Downs AONB Management Plan, to which Tandridge is a signatory.

Thank you again for your time.

Kind regards

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