Dear Louise

Please find the attached document for your consideration.

Regards
Stuart Merrylees

Westerham Town Partnership
www.visitwesterham.org.uk
Response to TDC 2018/1792 from the Westerham Town Partnership

Version V1.8  9th November 2018

We have studied the documents for the third DPD/Roxhill planning application at Moorhouse and note that since they withdrew the last application they have had 2 years to prepare this one. In a matter of days, we were dismayed to find all sorts of omissions and inaccuracies.

This is undermining the integrity of the application and our trust in its conclusions.

We would ask that councillors take our observations into account in making their decision. Quotations from the planning submission itself are italicised below.

We object on the following grounds: (see detail below)

1. The area in question is within the Green Belt and ‘very special circumstances’ have not been demonstrated, on the contrary.
2. The proposed site is within AONB, an inappropriate location
3. Inverse impacts on Westerham significantly outweigh any benefits
4. We believe size of operation and growth of business assessments are disingenuous at best and wrong at worst.
5. We believe postcode distribution proposals are wrong
6. We believe parcel/van movement predictions are wrong
7. Transport Assessment misleads the reader in stating the carriageway as far as Westerham is 7.3m wide, but omits to say this narrows to 4.8m on three entries into the town
8. Westerham Town Partnership traffic report demonstrates severe effect of traffic, including death and accidents, from existing volumes of traffic. London Road/A25 junction is already suffering from over capacity – any further volume being the next category - severe adverse effect.
9. Any promises related to sustainability and local jobs are ill founded. We believe that the effects of such a vast development would lead to a major deterioration of the character and economy Westerham and its adjacent towns and villages.

Green Belt and the future of Westerham and towns in the A25 AONB corridor.

(a) Surrey AONB opinion. We have read and thoroughly endorse the submission by Clive Smith of the Surrey Hills AONB.

(b) Oxted and Limpsfield Residents Groups QC’s objection to the applicant’s claim that the site be considered as developed land and not existing Green Belt.

(c) Westerham Town Council makes the statement that:
The Moorhouse site lies within the Green Belt and is recognised as Green Belt in the current version of Tandridge District Council’s Local Plan. As such any proposal for development must demonstrate ‘very special circumstances’. (NPPF 2018 paras 143-147). Westerham Town Council argues the lack of ‘very special circumstances’.
(d) Roxhill's own website has a statement on "Corporate Responsibility".
See www.roxhill.co.uk/corporate-responsibility/

**Corporate Responsibility**

*We have a deep sense of our own corporate responsibility and work hard to encompass the realities of yours. We take a long term interest that is about more than building. We are reactive to local needs and we listen to local issues, whether those are to do with the environment, the local economy, creating career opportunities or other concerns.*

We always consider how we can make a difference to people and communities. We are proud of the fact that our involvement in large-scale projects enables us to deliver quite substantial social gain. For example, potential benefits to local communities from our developments include the number and range of jobs that may be generated, and additional business for local companies. Being able to put something back; to put value into an economy by generating local growth is very important to us.

Para 2.2.4 (page 14) of the Roxhill’s Transport Assessment says that development should only be prevented from coming forward when any inverse impacts "significantly and demonstrably outweigh the benefits". It doesn’t appear to list a single inverse impact, but many of them are outlined in this document.

Para 6.2.2 (page 50) of Roxhill’s Transport Assessment lists the existing DPD sites that should be used to estimate traffic in Westerham: Cardiff, Dagenham, Stoke and Dunstable. Is Westerham and its environs destined to become such a place as these?

Having been able to consider the impact of these proposals for the last 3 or 4 years the Town Partnership finds nothing but “inverse impacts”. In every way this application is inappropriate, intrusive and disruptive and does nothing to help the local economy.

Government planning policies state that “any changes to an AONB should be made sympathetically with the surroundings: ideally they should enhance the character of town and landscape”. In this application we can find no positive benefits, except to the developers themselves.

**Size of the Operation and Growth of Business**

The area of the building is exactly the same as in the previous application in 2015 which was turned down and in 2016 application which was withdrawn.

DPD press releases state that internal procedures and sorting equipment have had 2 years further development and are more efficient. Roxhill claim that the peak output would be 25,000 parcels/day and ultimate maximum capacity be 30,000 parcels/day (TA 6.6.7). Roxhill’s stated figure for growth is 20% - is this per annum? The statement is unclear.
4.2.3 of the Transport Assessment:

*Graph 4.1 demonstrates that DPD have recorded a year on year growth in the last five years from around 54 million parcels per year in 2011 to around 150 million parcels per year in 2016.*

This is actually 23% per annum compounded over 5 years. At this rate, the business will have doubled in five years. It would clearly be a very narrow-minded business decision for them to limit their new building to a lifetime of 5 years or even 10. In 10 years’ time, Moorhouse would need to be handling 150,000 parcels. This may well be possible by adding extra shifts and extra equipment.

We have been told that smaller sites like Dartford, Croydon, Maidstone, Crawley and Burgess Hill are already at full capacity. Press releases indicate that at 5,500 sqm, the proposed Moorhouse site would be the smallest the company now build.

**Proposed postcode distribution area for Moorhouse depot**

The figures presented in Roxhill’s Transport Assessment do not appear to be consistent within the current application or across the two previous applications.

Proposed delivery areas from Moorhouse grew from 51 postcodes in the 2015 application to 74 postcodes in 2016. Curiously, there are now only 21 postcode areas in the 2018 application (see Appendix U of current Transport Assessment). It is evident that if it was considered feasible to service 74 postcodes from Moorhouse in 2016, we must conclude this could still happen.

As regards consistency, we were told in 2016 that the area of 74 postcodes (population 1.9M) would receive 18,000 parcels/day from Moorhouse. Now we are told (para 4.6.9) on 14th February 2017, (claimed to be a “typical” day), the 21 postcodes (population 343,000) received 17,317 parcels.

However, para 8.2.3 has a Table 8.1 which shows the total parcels delivered to these 21 postcodes in 2016 was 1,287,516. This is an average of 3576 parcels/day. How was it that 14th Feb a year later had 5 times this volume? There is clearly something amiss with these figures.

**Taken altogether, this begs the question whether the right postcode map has been attached to the application.** If it is correct, the 21 postcodes appear to receive about five times the national average, per head of population. It seems highly probable that the list of postcodes that Moorhouse will service is likely to be the one they submitted in 2016, being 74 postcodes.

**Wide variation in number of parcels/van**

The number of parcels per van delivered depends on the size of the parcels, the size of the van, the length of the working day, the traffic and the time between deliveries. DPD quotes their national average of parcels per van as 113. Examining the figures in Table 7.10 of their Transport Assessment for the 20% traffic growth at Moorhouse, when throughput reaches 30,000 parcels/day, the table shows that 200 vans will be required. This implies a figure of 150 parcels/van. On the 14th Feb (typical day) the figures show only 99 parcels/van. If we use the national average of 113, then 30,000 parcels require 265 vans. Using 99 parcels/van would require 303 vans. This is a critical parameter in modelling the whole DPD operation and if it is not used consistently, the application is flawed.
The Transport Assessment and Westerham’s narrow winding roads

Para 3.3.1 (p23) states that the A25 between Oxted and Westerham is well maintained with a carriageway of approximately 7.3m width. Nowhere in the transport assessment does it mention that the width of the A25 through Westerham reduces to 4.8m at two points, or that the London Rd (A233) at Costa is also only 4.8m wide. Government recommendation for minimum width of this class of road is 7.3 m. Given all the detailed description of the Transport Survey it is difficult to see why these important facts were left out.

Westerham has three severe pinch points, hills and bends, four junctions with major N-S roads and many very narrow or non-existent pavements (N side of A25 before Croydon Rd, W side of London Rd opposite Costa, N side of A25 at Vicarage Hill). A HGV travelling east cannot turn left into Croydon Rd in one manoeuvre. At Manor House (Croydon Rd) and by Yew Tree Cottage (Vicarage Hill), any large vehicle needs to wait or mount the pavement so any other vehicle can pass.

The width of a Mercedes Sprinter van (the sort that DPD uses) is 2.02 metres. Adding wing mirrors totals 2.4m. Two such DPD vehicles could not pass one another at the three pinch points in Westerham.

All of the above issues result in significant traffic queues with associated pollution and noise worst of all on London Rd.

How does a transport engineer factor in these situations? None of these hazards can be ignored by the pedestrian, so clearly must not be ignored by a professional road engineer.

Town Partnership Report on Westerham’s traffic and congestion

In 2015, the Westerham Town Partnership performed a study of traffic in Westerham, particularly with reference to the impact of HGVs and LCVs. This report was updated in September 2018 and has been submitted to Tandridge District Council in respect of 2018/1792. It is also online at


London Rd/A25 junction

The Roxhill Transport Assessment (para 3.8.12) takes trouble to point out that this junction is already overloaded in rush hours, with queues of up to 20 vehicles. This in “transport jargon” is classed as “over-capacity”. The next category is “severe”. The table below shows delays in seconds which define the categories from “acceptable”, through “over capacity” to “severe”.

The I-Transport analysis involves a desktop study using ‘Junctions 9’ software and some traffic data from the location. We in Westerham monitor the queue at the London Rd junction all the time. Many evening it is 30 vehicles and on a recent Sunday morning and last night, the traffic queue stretched back to Quebec Av. We have counted 70 cars waiting to get on to the A25, due to a continuous stream of traffic on this A road. How can the severity of this situation be quantified? See how Hampshire quantifies this, below.
In 2016 Hampshire Services in Winchester prepared a Traffic Assessment for the South Downs Local Plan and defined some useful parameters for defining the impact of development, a simple delay in seconds and a RFC coefficient, which measured the ratio of flow at a junction to its capacity.

The following text can be found at https://www.southdowns.gov.uk/wp-content/uploads/2018/04/PCP03a-Local-Plan-Transport-Assessment.pdf

Table 1.2 Parameters for Defining Impact of Development

<table>
<thead>
<tr>
<th>Delay (seconds)</th>
<th>Acceptable</th>
<th>Over capacity</th>
<th>Severe</th>
</tr>
</thead>
<tbody>
<tr>
<td>&lt;120</td>
<td></td>
<td>&gt;120 – 180</td>
<td>&gt;180</td>
</tr>
<tr>
<td>RFC (%)</td>
<td>&lt;0.85</td>
<td>&gt;0.85 – 1.0</td>
<td>&gt;1.0</td>
</tr>
</tbody>
</table>

Transport Assessment of the South Downs Local Plan
Prepared by Hampshire Services on behalf of the South Downs National Park Authority
December 2016

Model Outputs

For the purpose of this TA the following parameters, based on the results of the junction modelling, will be assessed to establish when the impact of development (i.e. the difference between the reference case and the reference case + Scenario 1 or 2) results in a severe highway impact.

Where the junction modelling predicts:

- **Ratio of Flow to Capacity (RFC) of over 0.85**: the junction is described as being over operational capacity, but still considered to be acceptable;
- **RFC of over 1.0**: the junction is described as being over theoretical capacity, as such the modelling results become increasing unstable resulting in queues and delays increasing exponentially;
- **Delays of 120 seconds (2 minutes)**: are described as having a greater negative effect on driver state of mind and tolerance;
- **Delays of over 180 seconds (3 minutes)**: are detrimental to driver state of mind and tolerance and could lead to an increased accident risk, increased use of inappropriate routes or through driver frustration;

As a result of the development proposal, significant increases over and above the levels quoted above, will be used to determine a severe impact. For example if a development proposal results in an increase in delay of over 180 seconds this will be defined as severe.

Accidents and Speeding Traffic

The Traffic report on Road Safety (section 3.7, p 26 onwards) has a list of accidents but sadly doesn’t mention the cyclist who was killed on Hosey Hill. It also omits the fact that the bus stop near Verralls Corner has been knocked down twice in the last 3 years and that the Forge at Verralls Corner has had two vehicles crash in less than 2 years, one which demolished the wall into the main front room. This is a severe bend which is always underestimated by drivers of big vehicles, especially when they meet another of their own kind, and drivers of small vehicles who are unfamiliar with the area just don’t see it coming. It is one of least desirable places to have to cross the road in Westerham and has very poor sight lines.
Westerham is already known for its speeding traffic, especially on the western side of town where Surrey CC has reduced the speed limit to 50mph, but Kent CC still maintains it acceptable to have a stretch at 60. Parcel delivery vehicles are always in a hurry and are typically driven at the maximum speed which road conditions allow. When they stop they are frequently forced to double park to make their delivery, adding a further hazard.

Most residents of Westerham would vote for a 20mph zone right through town but this we are told will never happen with an A class road.

**History of the Moorhouse site**

The site has been a sandpit and manufactured roof tiles for 70 years. Working normal hours Monday to Friday, it was considered by the local community as an acceptable rural industry. By contrast, a full 24hr / 7 day operation of a depot to deliver parcels to a vast area which will surely include Crawley, Dartford and Romford, Bromley, Croydon and Uckfield, where every van movement will start and end at Moorhouse, seems set to ruin rural communities and local economies.

**In Summary:**

This sort of operation does not belong in a landscape which is designated an Area of Outstanding Natural Beauty at the gateway to Kent.

When you visit London and come back to Kent or Surrey, you realise that "a city is a city and the countryside is the countryside" and we would make the point that the distinction should be respected and not eroded.
Dear Louise

We have studied and pondered KCC’s Highways response (17 Dec 2018) to the planning application at Moorhouse and have a number of issues that we would like you and your colleagues to clarify.

Your covering email to Tandridge notes that you have not seen I-Transport’s response to Westerham Town Council’s comments and WTC asked for further clarification last week. Many of the same questions were posed in the Westerham Town Partnership’s own response, attached.

The entire appraisal of Westerham’s traffic problems by Roxhill appears to have been done with JUNCTION 9 traffic modelling software and it seems to be on this basis that SCC and KCC consider their response. We would submit that this software has not been able to model or parameterise the effects of narrow pinch points, vehicles mounting the kerb, minimal or non-existent pavements and it has no cognisance of pedestrian behaviour or safety or pollution generated by queueing traffic and hill-starts. As I am sure you are aware, the effects of existing traffic in the town have been documented in our report www.visitwesterham.org.uk/wp-content/uploads/2013/08/LCV_Impacts_V7_280913.pdf, updated last September.

The glaring example of the problem is at A25/London Rd junction. The total overall road width (4.8m) means that a bus or HGV cannot turn into London Rd while there is any other vehicle waiting at the junction: traffic on the A25 waits while drivers on both roads consider their options and clear a space for the big vehicle to manoeuvre.

Included in the Roxhill report are the parameters used by PICADY software to predict queue lengths and RFC (Ratio of Flow to Capacity) figures at London Rd. The “lane width” for “Minor Arm Geometry B” has been entered as 3.0m. We wonder why the parameter has been given this value. There is no diagram of the junction. This is odd, as they have given us a diagram for the Croydon Rd, but in that they omit to show that the width of the A25 is no longer 7.3m, but only 4.8m. This is the second of our three pinch points. One critical PICADY parameter must be the “vehicle mix” which is shown as “HV percentages” without stating what percentages were used. Do LCVs qualify as HVs? Does the PCU value of 2.0 help describe the width of a vehicle, which is the all-important factor at a pinch point?

At London Rd, the I-Transport report (3.8.12) states that the junction is already “over-capacity” (RFC 1.07, queue 20, delay 203 secs). You quote I-Transport as predicting that by 2023, without any development, the queues could be 36 with a delay of 334 secs and that with DPD development queues would only increase from 36 to 39 and delay to 365 secs (that’s 6 minutes of exhaust fumes per driver and an unknown quantity for pedestrians and residents).

The concluding paragraphs in your report appear to state that this sort of queueing and delay in London Rd is somehow acceptable, and that although London Rd was over-capacity “the A25 is expected to operate without additional delay or queueing”. We would counter that the traffic on London Rd is attempting to become further traffic on the A25. Furthermore, any vehicle on the A25, wider than a car, trying to turn into London Rd, can only be accommodated by London Rd traffic giving way.
London Rd has only a single pavement and the pollution accumulates between the high-sided buildings. We have talked to residents living in that section of London Rd who can never open a window. The single pavement is so narrow (0.8m) that if you meet anyone, or a parent with a child, a pushchair or a pram (level with exhaust fumes), someone has to step into the road (or into a doorway) in order to pass.

We appreciate that the scope of responsibility of KCC Highways is limited to certain factors which affect the performance of traffic on the county's highways. But we would like to understand how KCC assesses the effect on pedestrian safety, pollution and people's behaviour as it affects the economy of the town. In our private lives, these considerations are not made in isolation or ring-fenced and we aggregate all the factors relevant to a particular problem situation. We do this almost automatically and intuitively. In towns with traffic problems such as those found in Westerham, desktop analysis which just relies on what can be measured with software cannot be acceptable. Its shortcomings will be evident as soon as you leave the office environment and set out for home.

As many people have observed, Westerham's roads were built to accommodate traffic in the days of the horse and cart. That indeed may be part of the charm of our old market town, which we observe is fast disappearing.

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**Managing Growth and Operating Capacity**

We continue to feel that the Roxhill submission contains severe contradictions that have not been explained and are not being challenged. The inconsistent use of number of parcels per van in predicting traffic flow has been highlighted. Furthermore, the inconsistencies in the postcode area coverage undermine the integrity of the report: do people in the supposed delivery area really have five times the UK average of parcels?

The other real problem is claim of zero growth of the site. The Roxhill statement that the initial capacity of 25,000 parcels/day will never be exceeded and that their policy is always to build new sites and not upgrade existing ones, is difficult to swallow, to say the least.

In the light of all these observations, we hope that KCC Highways may be able to revisit its recommendations to Tandridge District Council.

Yours

Stuart Merrylees

For Westerham Town Partnership

www.visitwesterham.org.uk