

HCS et al, Response to Amazon DPO1 Traffic Monitoring Report

Introduction

This document is the formal response by Havant Civic Society and the New Lane / Eastern Road Residents group ('HCS et al') to the first Amazon Traffic Monitoring report, dated August 2023 and published to the public access Planning Portal on 17 October 2023, together with subsequent correspondence between HBC Planning Services and Vectos/SLR, Amazon's appointed transport consultant, published on 1 December 2023.

References

The subject documents:

1. The first Amazon Traffic Monitoring report, '[COND 9 & 10 N01 ID OPERATIONAL TRAFFIC MONITORING REPORT](#)'
2. Subsequent [correspondence between David Eaves \(HBC\) and Ian Dix \(Vectos/SLR\)](#)

Further HBC planning portal sources referenced¹ in this response:

3. Vectos, traffic documentation submission and subsequent correspondence [filed with Planning Application - APP/21/00200](#)
4. HCS et al, [responses to Vectos deliverables filed with APP/21/00200](#)
5. Vectos, documentation and correspondence provided by [filed with APP/21/01244](#) and, in particular, [Revised Operational Management Plan \(for occupier of 32 New Lane\), dated January 2022](#)
6. HCS et al, responses to Vectos deliverables [filed with - APP/21/01244](#)

This response is divided into seven sections:

- 1 - Independence of the report sources
- 2 - Suitability of the Operational Management Plan as a reference base
- 3 - Report content
- 4 - Report appendices
- 5 - Fundamental objections
- 6 – Planning Condition breaches and enforcement actions required
- 7 – Our position on resolution

¹ Hyperlink references to document repositories are directly to planning portal sources. Due to restrictions on the saving of 'persistent' document links on the planning portal, links to individual documents are to mirrored copies on the HCS database. The master copies of all documents are held on [the HBC planning portal](#).

1 Independence of the report sources

The text of 'Planning Condition 10' in the Decision Notice for planning application APP/21/01244 states that: *"Prior to the occupation of the development hereby permitted the infrastructure to monitor traffic levels across the 3 site accesses as specified in the Operational Management Plan shall be installed. The occupier will comply with the monitoring and reporting measures specified in the Operational Management Plan, including the use of [an] independent data monitoring company."*

The Operational Management Plan (OMP) states at 5.6 that *"The data will be collected by the independent traffic survey company who will provide and maintain the equipment and will provide the survey data."*

While both documents stress the need for independence of the monitoring and reporting body, we are surprised that the Operational Traffic Monitoring Report not only appears under the 'Vectos' letterhead, but that the report is authored by Mr. Ian Dix, formerly of Vectos and now of SLR Consulting.

Neither Mr. Dix nor SLR Consulting, incorporating Vectos, can be considered 'independent'. When the identity of 'the intended occupier' was finally disclosed to the public, our detailed objections to the documentation and data content provided by Vectos in support of planning applications APP/21/00200 and APP/21/01244, were proven to be well founded. Mr. Dix's subsequent interventions during the passage of both applications through the Havant Borough Council planning process appear to have served only to elaborate the anonymity of Amazon's planning application through questionable presentation of unsound data, in order to expedite its passage through the process.

Neither Mr. Dix, nor Vectos, can be considered 'independent' for the purpose of the monitoring of Amazon DPO1 site traffic required by the conditions applied to the planning approvals.

Furthermore, in the correspondence posted to the planning record on 1 December 2023, in response to Mr. Eaves, Mr. Dix states that *"The independent survey company is: Advanced Transport Research (ATR). They are an independent traffic survey company based in Essex. They provide[d] the surveyed data used at the planning application stage and have provided and maintain the monitoring equipment that has been installed on the site."*

This raises two further points on independence. If ATR were indeed the source of the questionable data provided with the original planning applications, then the independence of that company (ATR) should also be called into question. The fact that Mr. Dix provides further detail on the recurring failures of the traffic monitoring equipment also raises questions over the credibility and efficiency of ATR's operations.

2 The Operational Management Plan as a reference base

2.1 Inadequacy of the documented Proposed Operation

The traffic monitoring report takes as its base data, the business operation and traffic generation detail documented in the [Operational Management Plan \(OMP\)](#), dated January 2022. However, the Amazon DPO1 site manager has acknowledged, in meetings of the DPO1 Community Liaison Panel and in the presence of local ward councillors, that actual traffic movements at that site bear little or no comparison to the traffic generation so described. After the first ten months of site operation, this is still the observed fact.

The OMP describes the Proposed Operation at Section 2, thus:

“2.3 The site will be used as a ‘last mile’ distribution centre where parcels are delivered via small vans to customers in the local area. The occupier is looking to consolidate their operations on one site. This is opposed to vans being stored in the local area on separate sites.”

Comment:

The bulk of the van deliveries are by third party [Amazon Delivery Service Partners \(DSPs\)](#) using externally stored vans which arrive empty to pick up loads, then do not return to the site but are stored ‘in the local area’ until returning to pick up their next scheduled load.

Not only are vans stored ‘in the local area’, but DSP vans are regularly reported loitering on local residential streets awaiting call-in for pick-up times and, following departure from the site, re-arranging and transferring loads. This has been reported to the site management who are struggling to maintain control over these third party drivers. To quote an email received from DPO1 site management on 4 January 2024, they are *“struggling to ascertain the company those vans belong to, so have taken the immediate mitigation action of briefing all Delivery Service Partners.”* The most recent concern raised directly with the Site Manager by a member of the DPO1 Community Liaison Panel on 12 January 2024, highlighted that two vans transferring loads had blocked ambulance access to a neighbouring residential property.

Neither the OMP, the Traffic Monitoring Report nor any previous planning history describes the movements due to [Amazon Flex deliveries](#) by private cars, which forms a significant daily observed component of the current traffic generation.

“2.4 Local drivers would arrive at the site by various means of transport, collect a van and leave the site to make deliveries. Once all deliveries have been made, drivers would return the vans to the site, collect their own vehicles (if they have driven to the site), or travel home by other means of transport.”

Comment:

This is not the observed business process, see previous comment.

"2.5 The operation is effectively a freight consolidation site with the number of HGVs to/from the site being minimised through the most efficient use of each vehicle to minimise movements. The vehicle movements associated with the proposed development are already on the local road network as the occupier currently operates within the Havant area."

Comment:

The occupier is Amazon, a company which did not previously operate within the Havant area. Amazon's Delivery Service Partners and Flex drivers, working from Amazon sites remote to the Havant area previously delivered to addresses in 'the Havant area', but those vehicle movements amounted to only 5% of the total vehicle movements now attributable to DPO1, according to the data provided by Vectos with Planning Application APP/21/00200.

"2.6 The vans based on this site undertake the last mile element of distribution i.e. to the customer. They leave the site in the morning between 07:00-12:00 and return between 16:00-21:00. They are loaded to ensure that they can deliver goods for at least 6 hours in a single journey. This ensures efficiency of the operation and reduces vehicle movements."

Comment:

This is not the case, and has been confirmed not to be the case by the DPO1 Site Manager, speaking at the Community Liaison Panel meetings. Loads for delivery to customers are also collected after 12:00, often by privately-owned vehicles driven by Amazon 'Flex' gig-economy drivers. The DSP vans, which carry out the bulk of the van deliveries, are not stored on site overnight and do not return to DPO1 until their next scheduled pick-up slot.

"2.8 The proposals for the site involve the provision of 866 operational storage spaces for the van fleet which during the day would be used as parking spaces for drivers that arrive at the site by private car."

Comment:

The 866 operational storage spaces are currently not used. They have been designed to meet a future strategic business operation which has not yet been implemented and has yet to be publicly acknowledged, given that it will involve commercially confidential logistics outsourcing negotiations with significant Amazon clients.

With regard to the Traffic Generation, Section 3 of the OMP states:

“3.1 A summary of the trip generation for the proposed development, for the AM and the PM network peak period and across the day is set out in Table 3.1. The trip generation for each hour across the day for the occupier for each vehicle type is contained in Appendix A of this report.”

Comment:

Refer to comments raised against ‘Table 1, Table 2 and Table 3’ on page 7 of this document.

“3.4 The operation of site will accord with the agreed traffic generation set out above with there being no material changes to the levels of traffic generation assessed. There may be a need for additional assessment work if traffic levels at peak times are materially increased above the agreed figures used in the assessment of the extant planning consent. In line with the relevant planning condition that form part of the planning consent, there should be no significant deviation from the operation set out, without the consent of the Local Planning Authority.”

Comment:

To the best of our knowledge and the absence of published notification, there has been no consent given for the ‘significant deviation from the operation set out [in the OMP]’.

3 Report Content

The page and point references in this section relate to the [first published Traffic Monitoring Report](#) with further comment on [the subsequent correspondence between Ian Dix \(Vectos/SLR\) and David Eaves \(HBC\)](#) published on 1 December 2023, the subjects of this response.

3.1 Background

Page 1 - Point 1

“Monitoring of movements via CCTV with regular reporting via an independent third party to the Local Planning Authority in accordance with the parameters of the OMP.”

Comment:

It has taken ten months for the first report to be published on the HBC planning portal. The reporting can hardly be described as ‘regular’, and as discussed earlier, the ‘third party’ cannot be considered independent.

“The occupier will comply with the monitoring and reporting measures specified in the Operational Management Plan, including the use of independent data monitoring company. Data will be used for monitoring the effectiveness of the Management Plans only.”

Comment:

The first sentence stresses the need for independence. The second sentence, in the context of the discrepancy between the observed and documented business processes, demonstrates clearly the in-effectiveness of the ‘Management Plans’.

“To confirm that the traffic levels presented in the Operational Management Plan at planning are reflective of the on-site operation...”

Comment:

The traffic levels presented in the Operational Management Plan at planning, and indeed throughout the planning process, are **not** reflective of the on-site operation. This observed fact has been acknowledged by DPO1 site management in the presence of the HBC Case Officer and the local ward councillors at DPO1 Community Liaison Panel meetings.

Point 1 fails to identify a third condition of the planning approval for APP/21/01244, Condition 4, which also requires that accurate monitoring be undertaken.

Condition 4 - *“The Full Operational Management Plan document produced by Vectos Ltd, dated January 2022 shall be implemented as approved, and be observed throughout the period that the lawfulness of activity at the development land relies upon this Planning Permission. No significant deviation from the provisions of the approved plan shall be permitted, without the express written consent of the Local Planning Authority.”*

Comment:

As discussed in the previous section on the Operational Management Plan, Amazon are observed to have failed to implement the ‘Proposed Operation’ and its resultant ‘Traffic Generation’ as approved. This deviation from the provisions of the approved plan have been acknowledged by the DPO1 site management during DPO1 Community Liaison Meetings in the presence of the HBC Case Officer and HBC ward councillors.

Page 2

General Comment:

The quoted sections from the Operational Management Plan have been rendered invalid for monitoring purposes by the observed reality that Amazon does not follow the delivery vehicle business processes set out in the agreed document. The exception is point 5.20, which warrants closer inspection:

“5.20 A form of the monitoring reports will be agreed between the independent traffic survey company, the occupier and the LPA in advance of the first report being prepared. This needs to take into account the constraints of confidentiality of data under GDPR and the format of survey results being consistent with DfT approved formats.”

Comment:

We find it difficult to believe that officers of the LPA would have agreed the format presented in the Traffic Monitoring Report, given that the resulting summary is without value, failing to provide the clear and unambiguous breakdown of actual daily traffic generation at the three site entrances against the maximum permitted use agreed under planning, i.e. 2,415 vehicle movements.

Page 3 – Tables 1,2 and 3

Comment:

Tables 1, 2 and 3 demonstrate very clearly the invalidity and irrelevance of the original ATR ‘Peak Hour’ data provided first with planning application APP/21/00200 and carried forward through APP/21/01244 into the Operational Management Plan. It seems likely that the morning and afternoon ‘peak hours’ shown in Table 1 were deliberately overstated in the original Transport Statement provided by Vectos with APP/21/00200 safe in the knowledge that Amazon’s actual traffic profile would never approach, let alone exceed, the figures given at those times.

Page 4 - Points 10-17

Comment:

These points, and the headline ‘Traffic Heading South’, place excessive focus on traffic south of the site on New Lane and ignores any analysis of traffic following the two major routes used by traffic at the site gates - Crossland Drive and New Lane / Bartons Road to the north.

Even within this constraint, the data presented is meaningless.

“12 - While the reason for the condition was to ensure that vans leaving the site do not use New Lane to the south of the site this analysis has been undertaken for all vehicles entering and leaving the site.”

Comment:

The only analysis shown is of traffic on New Lane south of the site.

Comment:

While Point 12 refers to 'all vehicles', the 'Monitoring report' chooses to only include 'panel vans'. Given that a large number of the delivery vehicle movements in all directions from the site are, in fact, attributable to private cars, owned and driven by Amazon Flex drivers, this is a significant omission from the data presented.

The assumption that 'all vans travelling before noon are leaving the site (outbound) and all those after this time are returning (inbound)' is false and frankly laughable. As clearly observed, and admitted by Amazon during Community Liaison Panel meetings, the bulk of the deliveries are undertaken by DSP vans and Flex cars and vans arriving at the site empty for loading on-site before exiting within a matter of minutes. Most of the DSP traffic movements occur between 10:00 and 13:00, in waves timed and managed to minimise congestion within the site. The Amazon Flex deliveries take place once the DSP movements have cleared the site, in the main during the afternoon and evening, and are biased towards short-schedule or same-day delivery orders.

4 Report Appendices

4.1 Appendix A

Appendix A of the Operational Traffic Monitoring report is assumed to be derived from ATR raw data which, if complete, ought to provide the facts that are needed. However, this first published example of the report omits several essential data elements.

The report does not break the data out by 'site entrance', nor does it break it down by direction (inbound or outbound) at each entrance. Without this detail, it is impossible to reconcile the reported data with the reference data recorded in the Operational Management Plan (OMP) at Appendix A.

To set the right expectation for the future, the raw data should be provided to Havant Borough Council and Hampshire County Council directly by an independent traffic monitoring company prepared to commit to data collection integrity. There is no need, or any value to be gained, by allowing interference or intervention from Vectos, SLR or Amazon UK Services in the summarisation of this data which should be provided fully detailed and appropriately documented in a recognised spreadsheet format.

4.2 Appendix B

The coverage and content of Appendix B of the Operational Traffic Monitoring report is unclear. We assume that the column headed 'Site' represents gate number, from '1' in the north, to '3' in the south. However the data carried in the columns headed 'Time exiting', 'Time at New Lane' and 'Duration' are clearly not what the headings suggest.

Since the data is clearly taken from anonymised ANPR data mapped to DVLA vehicle descriptions, it should be a straightforward matter to report 'time of arrival', 'time of exit' and 'duration on-site' for each individual vehicle arriving and leaving the site. Like Report A, this report should also include direction - inbound/outbound – for each traffic movement.

5 Fundamental objections to this report

5.1 Timeliness of reporting

The report Background section quotes the following clause from the Operational Management Plan:

“5.7 During the 18 months of operation a quarterly monitoring report will be provided to include data for that quarter. There will be data collected at the same time as when the monitoring of traffic using New Lane to the south of the site is undertaken to ensure co-ordination.”

Comment:

Amazon UK Services had been operating at the 32 New Lane 'DPO1' site for eight months before this first incomplete and unacceptable report was put into the public domain. The correspondence between Mr. Eaves and Mr. Dix was only made public after a further two months. The delay in provision of these traffic reports, together with the lack of usable content, is completely unacceptable and fails to meet the required conditions.

5.2 Fitness for purpose of the Operational Management Plan

The Operational Process defined in Section 2 of the Operational Management Plan (January 2022 revision) is unrecognisable from the observed operational process in place at 32 New Lane, a fact acknowledged by DPO1 site management during Community Liaison Meetings and witnessed by the HBC local councillors present at those meetings.

The traffic generation profile defined in Appendix A and reflected in Section 3 of the OMP, bears no relation to observed reality, a fact that does not surprise HCS et al, given our previous documentation on file with both APP/21/01244 and APP/21/00200.

Given the gross inaccuracy and complete irrelevance of Sections 2 and 3 of the Operational Management Plan, it follows that the monitoring process described in Section 5, Monitoring, has no accurate or agreed baseline for its specification.

The only conclusion that can be drawn from these observed facts is that the Operational Management Plan does not provide a fit and proper foundation from which to monitor traffic generation from the DPO1 site.

5.3 Relevance of the Peak Periods

Given the complete departure from the documented and agreed business processes, the 'Peak Periods', (0800-0900 and 1700-1800), which have always been shown in the ATR supplied data as the highest two single hour periods for traffic generation each day, are in reality, amongst the lowest hours for observed traffic generation. It seems highly likely that the morning and afternoon 'peak hours' shown in Table 1 were overstated in the original Transport Statement provided by Vectos with APP/21/00200, safe in the knowledge that Amazon's actual traffic profile would never approach, let alone exceed the figures given at those times. The reporting of 'actual' against 'documented' numbers for these hours therefore has no value.

While this concern was raised and ignored repeatedly during the planning process, with ten months of observation of the actual business processes, once again our concerns are proven correct. Very little traffic would be generated during either of these documented one-hour peak periods, a fact already known and deliberately exploited in the transport documentation which underpinned the original planning applications and the resulting Operational Management Plan.

5.4 Behaviour of van drivers in surrounding residential streets

Havant residents are reporting that vans are arriving ahead of schedule and parking up on local streets, waiting to be called in to collect their loads. On departure, some van drivers are observed to be meeting in local residential streets to re-sort and re-distribute packages between themselves.

Both activities are considered unacceptable nuisances which are exacerbated by the fixed times scheduled for the individual driver's pick-up slot and restrictions on the length of time that a driver is permitted to remain on-site before he must join the next scheduled 'managed wave' of departures.

Site management are clearly struggling to maintain control over these third party drivers. To quote an email received from DPO1 site management on 4 January 2024, they are *"struggling to ascertain the company those vans belong to, so have taken the immediate mitigation action of briefing all Delivery Service Partners."* Photographic evidence has been provided to the Site Manager on multiple occasions and the issue was discussed with the DPO1 Site Manager at a Community Liaison Panel meeting on 30 October, 2023.

The Site Manager provided an assurance that there are no such time limits and that incoming drivers were welcome to arrive early and circulate on the currently-unused upper vehicle parking decks while awaiting their pickup slot. Despite this, the problem regularly recurs and the most recent, raised directly with the Site Manager by a member of the DPO1 Community Liaison Panel on 12 January 2024, highlighted the case of two vans transferring loads while blocking ambulance access to a neighbouring residential property.

The issue of drivers redistributing packages in side streets after departing the site is claimed to be unknown, but clearly reflects known constraints with the delivery station processes.

6 Planning Condition breaches and enforcement actions required

Since the commencement of operations in March 2023, the following breaches in the Planning Conditions applied to [the Decision Notice for APP/21/01244](#) have been noted at 32 New Lane in communications to HBC Planning Services by email. To date, no action has been publicly acknowledged and no resolution observed.

6.1 Planning Conditions for which enforcement action is required

Condition 4 – *“The Full Operational Management Plan document produced by Vectos Ltd, dated January 2022 shall be implemented as approved, and be observed throughout the period that the lawfulness of activity at the development land relies upon this Planning Permission. No significant deviation from the provisions of the approved plan shall be permitted, without the express written consent of the Local Planning Authority.”*

Reason: *To ensure any future occupier abides by the assumptions within the Transport Assessments agreed at planning having due regard to policies DM11 and DM12 of Havant Borough Local Plan (Core Strategy) 2011 and the Planning Policy Framework.”*

Comment:

Our response to the subject Traffic Monitoring Report demonstrates that the actual ‘last mile delivery’ process in operation at the Amazon DPO1 site deviates significantly from the approved plan.

Condition 10 – *“Prior to the occupation of the development hereby permitted the infrastructure to monitor traffic levels across the 3 site accesses as specified in the Operational Management Plan shall be installed. The occupier will comply with the monitoring and reporting measures specified in the Operational Management Plan, including the use of independent data monitoring company. Data will be used for monitoring the effectiveness of the Management Plans only.”*

Reason: *To confirm that the traffic levels presented in the Operational Management Plan at planning are reflective of the on-site operation in the interests of amenity and the efficient operation of the Highway Network having due regard to policies CS20 and DM12 together with the National Planning Policy Framework.”*

Comment:

There is sufficient difference between the proposed and observed ‘last mile delivery’ traffic profile to conclude the traffic levels presented in the Operational Management Plan at planning are not reflective of the on-site operation. Furthermore, the data monitoring companies engaged cannot

be considered 'independent'.

Condition 30 – “Prior to occupation, the operator will establish a Community Liaison Panel (CLP) with key stakeholders and interested parties.

- The Terms of Reference will be established at the first meeting, including escalation of concerns submitted by members.
- The operator will maintain a list of membership details
- A schedule of meetings to be offered to the panel

To provide residents and stakeholders an opportunity to feedback to the site operators on the effectiveness of the arrangements in place. Comments received will be used to make improvements to the site operations and address issues that arise as and where appropriate.

Reason: To allow for community engagement and to seek to address issues raised by the community in the interests of amenity having due regard to policies CS16, CS20 and DM12 of the Havant Borough Local Plan (Core Strategy) 2011 and the National Planning Policy Framework.”

Comment:

HCS et al highlighted the fact that this condition had been breached on multiple occasions since operations were first observed to have begun in February 2023. The CLP was finally set up after a delay of five months. While this breach has now been belatedly resolved, the length of time taken for that resolution is a disquieting reminder of what appears to be the Local Planning Authority's dilatory attitude towards the enforcement of planning conditions at 32 New Lane.

6.2 Revision and maintenance of the Operational Management Plan

The Operational Management Plan must be revised to ensure that it reflects the actual operation of the Amazon DPO1 site at 32 New Lane in order to enable accurate monitoring of traffic generation at the 32 New Lane site. Prior to the start of operations by Amazon, the OMP was approved by the local planning authority in good faith as a documentary record of the proposed operation which Amazon would implement at the site.

That proposed operation was originally presented to the local planning authority and Havant town residents by Natalie Fellows of Fellows Planning, acting as agent for the planning applicant, Jeremy Sharland of Havant Property Investments, the site developer, Christopher Fry of Kingsbridge Estates and the transport consultant, Ian Dix, then of Vectos. Mr. Dix has been identified as the transport consultant engaged with other similar planning applications submitted to various local planning authorities and with that experience should have had prior experience of the actual traffic generation profile at these Amazon sites.

The generated traffic profile observed at 32 New Lane in the ten months since the start of operations bears no resemblance to the expectation set in the agreed OMP. While it may indeed be Amazon's long term intention to deploy such a model, capitalising on the approved, constructed but currently unused van storage decks, the current revision of the Operational

Management Plan (dated January 2022) documents a 'proposed operation' which is neither valid nor accurate as a current baseline for traffic monitoring.

6.3 Ensure accurate traffic reporting

Regardless of the business operational model being deployed by Amazon at the 32 New Lane site, the single critical figure that must be monitored is the total number of vehicle movements per day across all three site entrances. This was originally set by Vectos in the Transport Statement for APP/21/00200 based, as we now know, on input from ATR and was confirmed by the conditions applied to Section 73 application APP/21/01244 as a total of **2,415** vehicle movements per day. This total, while significantly in excess of the previous observed traffic generation from the 32 New Lane site under its previous occupation by Wyeth/Pfizer, was deemed sufficiently close to the maximum previously permitted traffic generation to enable the original anonymous 'Amazon' planning application to pass the HBC planning application validation process.

Havant Borough Council as the Local Planning Authority, and Hampshire County Council as the Highways Authority, should not accept traffic reports authored by SLR/Vectos as being sufficiently independent to satisfy the terms of Condition 10 as applied to the approval of APP/21/01244.

Given the lack of independence of the report sources, we see two practical approaches to enforcement.

1. In the first place, the local authorities could collect the raw site traffic data directly from ATR into a repository managed by Hampshire County Council as the Highways Authority, from which traffic generation reporting can be accurately managed. However HCC must also acknowledge the likely unreliability of data sourced from ATR. As the acknowledged originator of the incomplete and inaccurate traffic data which underpinned the validation of the original planning application, ATR may not now be considered independent for the purpose of Condition 10.
2. If ATR prove unable to provide reliable and uncorrupted details of all traffic movements, inbound and outbound across the three site entrances, then it is incumbent on Hampshire County Council and Havant Borough Council to install the appropriate roadside traffic monitoring equipment through which to ensure that the current site occupier, Amazon UK Services, remains within the agreed maximum permitted traffic generation of 2,415 movements per day. This could, in fact, be implemented with immediate effect and with immediate benefit.

6.4 'Re-setting the clock' on the schedule for Traffic Monitoring

The timetable for reporting of traffic movements has been completely and deliberately

disrupted and 'the clock should restart' once a fully revised Operational Management Plan has been agreed, accepted and approved by Havant Borough Council, Hampshire County Council and the local representatives on the DPO1 Community Liaison Panel.

6.5 Sign-off authority

The sign-off authority for the revised Operational Management Plan should include the Amazon DPO1 site management, Havant Borough Council planning services and the Amazon DPO1 Community Liaison Panel, which was convened and constituted according to Condition 30 of the planning approval for APP/21/01244.

Since it is evident that Amazon's operational model will continuously evolve, the revised content of the OMP should be version controlled from the new baseline, with future changes managed under formal version control along with regular revision of actual traffic generation. The document should continue to be filed with APP/21/01244 on the HBC public access planning portal to ensure transparency.

6.6 Delivery driver behaviour on local road network

We acknowledge that antisocial behaviour by delivery drivers is likely to be seen only in a minority of cases and that genuine attempts are being made by Amazon DPO1 site management to contain the issue.

While the initial planning application for the site was passed on the understanding that all deliveries would be carried out by a 'wholly-owned' and 'branded' fleet of vans, as we have discussed in this response, the implemented operational traffic generation is completely different, with delivery drivers divided into two categories. These are third party [Delivery Service Partner](#) drivers, over whom Amazon will have a limited level of contractual control, and [Amazon Flex drivers](#), over whom Amazon have a simple 'hire and fire' level of control, based on performance achievement against targets and end-customer feedback.

While it is reasonable to expect the police and highway authorities to accept the responsibility of traffic generated by the DPO1 operation once it joins the strategic road network, while passing through the residential and town centre streets, Amazon should have appropriate accountability for the behaviour of drivers, regardless of vehicle type or vehicle ownership and regardless of contractual terms of employment, while delivering on their behalf.

7 Our position on resolution

The position of Havant Civic Society and the New Lane / Eastern Road Residents' group must be clearly understood. The actions of Vectos/SLR, Havant Property Investments, Kingsbridge Estates and Fellows Planning, acting as agents for Amazon UK Services throughout the lifecycle of planning applications APP/21/00200 and APP/21/01244 have placed Havant Borough

Council and the residential population at a disadvantage.

It is likely that the unpublished record of the pre-application meeting held on 27 July 2020, between HBC, Luken Beck, Kingsbridge Estates, Vectos and DWD (Amazon's UK main planning agent) would show that the local authority were presented at that time with the same aspirational proposed operation, conveniently overlooking the reality of Amazon's actual proposed implementation model. It is also likely that DWD's ongoing activity in their capacity as Business Rate Consultants to Amazon UK Services, has placed the local authorities at a financial disadvantage.

Amazon UK Services and its agents have been at best disingenuous in their attitude to the local authority, the local residential community and the wider borough population who live alongside and rely upon access to the already-constrained routes to the strategic highway network junctions essential to its current and future business operations.

The anti-social driver behaviour witnessed by members of the DPO1 Community Liaison Panel is likely to be the 'tip of the iceberg'. Given the anomalous town-centre residential setting of what should in reality be a strategic edge-of-town operation, joint management and monitoring of driver behaviour by Amazon, and monitoring of the company's generated loading of local roads by the local authorities, are factors of clear mutual interest. As the Amazon operation expands and evolves to fit the company's strategic delivery station network model, this joint management and monitoring will become critical to the success of the business in the local setting.

The cheapest, quickest and most effective resolution to the situation that we all find ourselves in, while at the same time protecting Havant borough from uncontrolled future traffic generation at the 32 New Lane site, is for Hampshire County Council to take on the permanent monitoring of traffic data at all three 32 New Lane site entrances.

By installing external traffic monitoring devices at all three exits and storing the data collected, the daily traffic generation can be readily accessed and reported on demand. Should the daily peak of 2,415 be regularly exceeded, then appropriate actions can be put in place by HBC as the local planning authority.

[End of Response]

Robert Comlay, New Lane

Representative of the New Lane / Eastern Road Residents group and Havant Civic Society
Local resident member of the DPO1 Community Liaison Panel

14 January 2024