

APP/21/00200 – Objection and Supporting detail

Summary

This planning application is for a 'Last mile delivery' distribution centre for an undisclosed operator. The 100 European locations quoted in Appendix G of the Transport Assessment map to DHL so an operation of that scale is clearly intended.

This document expands on my objection to planning application APP/21/00200 raised through the Planning Portal on March 18 2021.

Comment submitted through HBC Planning Portal

"This application is for a large 'last mile' delivery operation (on the scale of DHL) to provide doorstep parcel delivery to Hampshire / Sussex / Surrey addresses by consolidating and relocating existing staff and operations to a larger site.

Inbound deliveries will be brought in, mostly overnight involving 32 daily HGV movements, for sorting and loading onto 866 vans for doorstep delivery across the three counties during the next day. The first vans will leave the site around 6am with the last returning around 11pm. Operations from the site are expected to run for 7 days a week, 24 hours a day, generating significant traffic. The unnamed occupier's estimates, based on their other similar European sites, expect the outbound delivery movements to total around 2,500 van journeys each day.

The New Lane employment site, which sixty years ago was an edge-of-town industrial estate, is now effectively landlocked by extensive residential development. To reach the major arterial roads, any traffic from New Lane must pass through the most congested traffic pinch points in the area:

- Park Road North
- New Lane Level crossing
- Bartons Road/Emsworth Common Road junction
- Bartons Road/Petersfield Road junction
- New Road/Bedhampton Hill/The Rusty Cutter roundabout

To meet delivery targets, the applicant proposes to route delivery traffic through the constrained residential streets south of the site, using the New Lane level crossing, Park Road North or New Road, ignoring the advisory HGV routing on Crossland Drive as "dictated by local demand and current traffic conditions".

The intended occupier states a sustainability target for "net zero carbon emissions for just 50% of shipments" by 2030, and the application proposes only 20% of the vehicle parking spaces will initially have electric charging points. Until 2030, the majority of the 2,500 daily van movements will therefore still be using Euro6 diesel propulsion. This represents an unacceptable pollution exposure to a residential area with high pedestrian throughput to schools and town.

The HBC Local Plan and the HBC Regeneration Strategy both very deliberately state

an intention for 'last mile delivery' operations to be located at the current edge-of-town sites, Dunsbury Farm, where DPD have already set up a similar operation, or the recently sold Brockhampton West for which an appropriate outline planning application currently exists - APP/21/00189.

The intended occupier's stated intent is to 'consolidate operations' into a new site. As such, most of the staff employed will be transferred from existing locations within the three counties. The application itself quotes 150 jobs lost on site with no new jobs created.

For the sake of New Lane, which deserves better employment opportunities, for the sake of the town, which desperately needs better control over traffic congestion, and for the safety of the pupils of Fairfield, St Albans, Bosmere, Glenhurst and Warblington schools and the students of HSDC, I ask you to refuse this application."

Supporting detail

Comments on Application

Vehicle Parking (Section 9) is misleading, quoting a *reduction* in car parking spaces at the site from 272 to 208.

The "*vehicle storage deck*" quoted in the Proposal is in reality a multi-storey vehicle park with 866 'van storage spaces'. The total parking space provided, for car and van, is therefore 1,074, more than five times the number stated in Section 9.

While Section 17, **Floorspace**, shows a reduction in total footprint of 20,459 square metres across all Use Classes, the significant Use Class, B8 – storage and distribution, increases by 270% from 5,231 square metres to 14,049 square metres. This increase is significant and questions the detail extracted in the Transport Assessment in support of theoretical comparisons with any previous use of the site.

Section 18, **Employment**, notes the loss of 150 jobs. Do not be swayed by the assumption that there will be a significant number of new jobs created. The intended occupier has stated that they are consolidating their operations from other sites.

Site context

The New Lane employment area was developed in the 1960s as an edge-of-town industrial estate, alongside the main London railway with West Leigh housing to the west and farmland to the north and east.

In the intervening sixty years, much has changed. Mature residential housing now surrounds the New Lane site and major new employment areas with ready access to the main arterial routes have developed on the outskirts of this expanding town.

An employment area in New Lane remains an important asset for the town, but the type of business located there must be sympathetic to its current residential context. Recent investment by life sciences companies AneticAid and Sartorius make it clear that opportunities exist for other office based businesses, light / quiet manufacturing and assembly businesses and long term secure storage.

Given the well-known traffic issues on Havant's roads, an occupier model in which employees commute inward at the start of day and homeward at the end of day, ideally some via the public transport network, would work well.

The business proposed for this site is, however, a '**traffic generator**' which would see an additional 2,413 HGV and LGV movements in to and out of this 'landlocked' employment site each day. The bulk of these LGV movements will be to the M27 west towards Southampton and the New Forest, to the A27 east towards Worthing and to the A3(M) north towards Woking. This will all be traffic fighting to get through the town against the clock to meet a promised doorstep delivery time.

The Havant Local Plan and the Havant Regeneration Strategy acknowledge that Dunsbury Park, where an equivalent operator, DPD, has already set up a hub, and Brockhampton West are the preferred sites for 'last mile delivery' operations, both having direct access to the main arterial routes.

Comments on Transport Assessment

Given the existing barrier formed by the railway to the east, the Transport Assessment notes that the only road access to this employment area is via the three entry points to New Lane. From the north via Bartons Road, from the west via Crossland Drive and from the south via Eastern Road, all three of these routes being through dense residential areas.

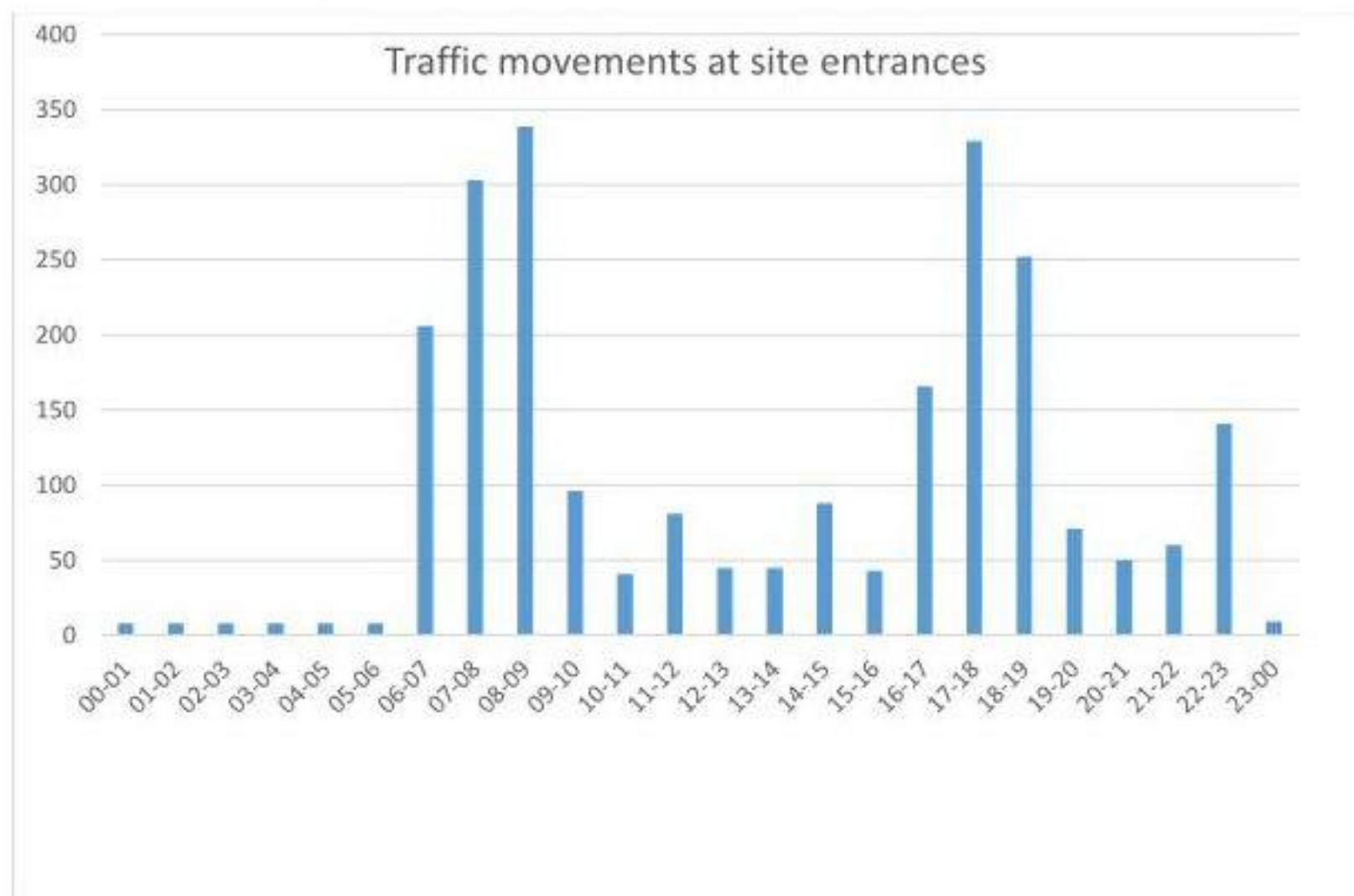
Bartons Road and Crossland Drive are the two main access routes, while the New Lane (south) route, to the west via Eastern Road and to the south via Fairfield Road is particularly constrained and unsuitable for the commercial traffic volumes predicted in the document.

The traffic movement data used below is from Appendix F and uses production data from the intended occupier's equivalent sites across Europe and the UK.

The Transport Assessment quotes 'existing traffic data' to infer that little or no net new traffic will be generated. These quoted figures do not refer to *actual movements* at the site today but to the maximum permitted under existing *approved uses* for the site. The calculations, using standard formulae, show the traffic that *would be generated* if the site were used to the maximum extent allowed under the planning permissions currently in place.

As a New Lane resident, I conclude that these theoretical 'existing traffic' numbers bear no comparison with the observed reality of 'current use'. The traffic movements quoted in this document and its charts therefore relate to net additional traffic movements.

Traffic volume generated over 24 hour day



Appendix F of the TA gives a 24 hour breakdown of the 2,413 daily vehicle movements predicted by the intended occupier. For the three hour morning peak period, 06:00 - 08:59, there would be 848 movements, an average of 283/hour or more than one additional vehicle every fifteen seconds. For the three hour afternoon peak period, 16:00 - 19:00, the total is 747, the average 249/hour, still more than one additional vehicle every fifteen seconds.

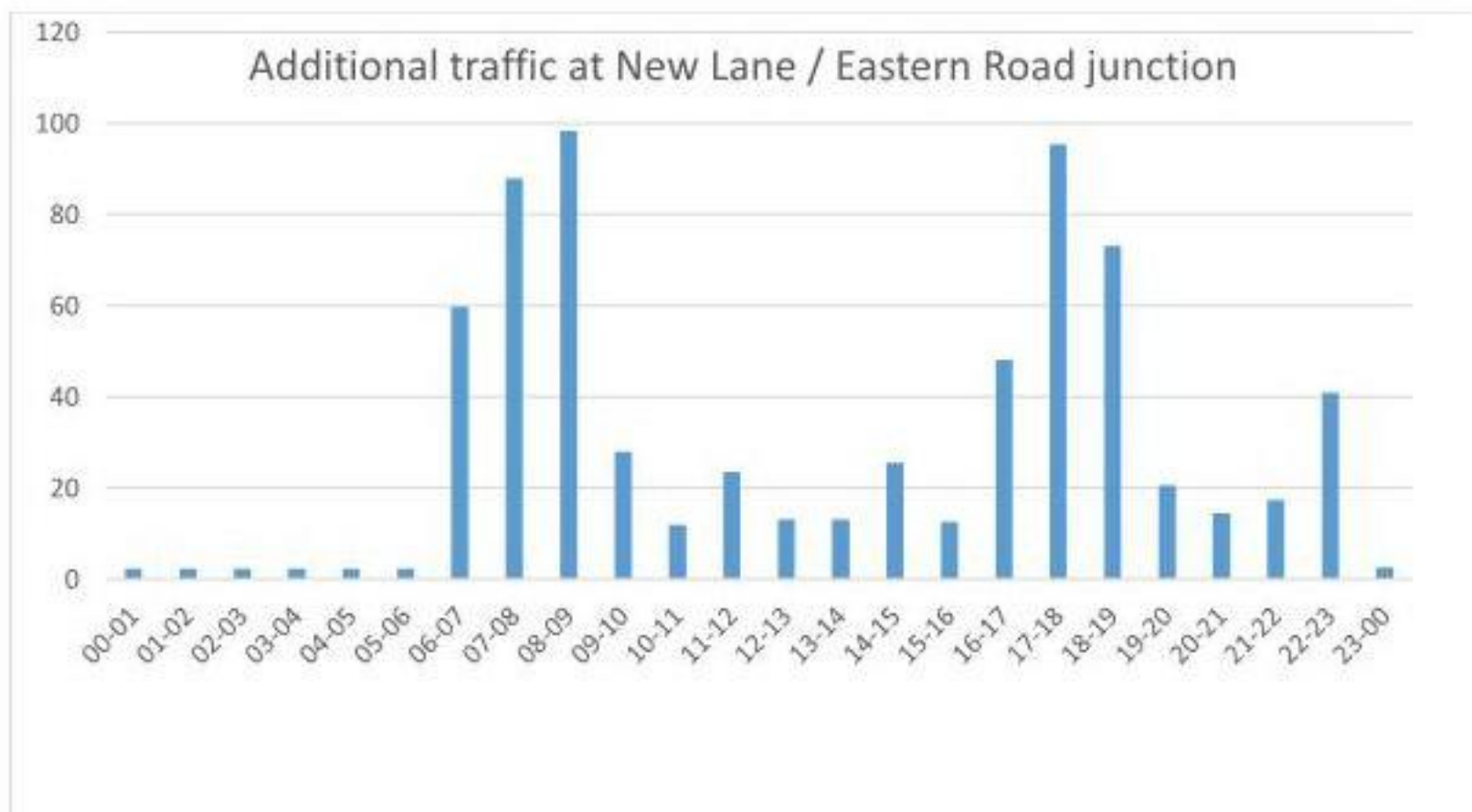
Traffic volume generated over 24 hour day at the Petersfield Road / Park Road North Roundabout

This roundabout is already notorious for congestion and gridlock so it is important to understand the additional loading on it by traffic from this proposed development. Table 5.7 of the TA shows that 70% of the total traffic will be using the Petersfield Road / Park Road North roundabout. For the three hour morning peak period, 06:00 - 08:59, there would be 594 movements, an average of 198/hour or more than one vehicle every twenty seconds. For the three hour afternoon peak period, 16:00 - 19:00, the total is 523, the average 174/hour, fractionally under one extra vehicle every twenty seconds.



Traffic volume generated over 24 hour day in New Lane (south)

New Lane (south) has become a natural rat-run enabling traffic to bypass the five sets of traffic lights on the Petersfield Road. The TA explicitly states that the intended occupier will exploit this rat run in order to meet its delivery promise to customers. The TA notes that while "[Crossland Drive] is an advisory HGV route as per the signage at the Crossland Drive/B2149 junction... in reality, vehicle distribution will be dictated by local demand and current traffic conditions which will cause route choices to vary day to day." In the operational routing table (5.7) the document states "applying the realistic scenario development trips to the likely route choices", just 1% of traffic will route via Crossland Drive while 29% of the traffic will be routed through New Lane (south).



Using the figures provided, this means that during the morning peak period, 06:00 – 09:00, there would be 246 additional vehicle movements at the New Lane/Eastern Road crossroads, that's one every 45 seconds, and during the afternoon peak, 16:00 – 19:00, a further 217 movements or one every 50 seconds, coinciding with the morning walk to schools and college.

Some of these vans will be routing via the New Lane level crossing, through Fairfield Road and Beechworth Road out to the Warblington interchange to the A27. The rest will be proceeding along Eastern Road, round the 'dog leg' junction with Leigh Road at the north side of the station, onto Elmleigh Road, and out onto the Park Road North roundabout.

These roads have long been unsuitable for commercial traffic and with the completion of the 'Station View' development at the former Wessex site, the only commercial traffic that has a need for access through these roads is Network Rail's contractor who currently stores material at their yard in the Eastern Road cul-de-sac.

Comments on the TRICS data used for traffic modelling

The Transport Assessment makes extensive use of modelling data from the TRICS (Trip Rate Information Computer System) to suggest that the net increase in traffic will be minimal.

The combination of the New Lane employment area's 'town centre' industrial context and Havant town centre's unique traffic pressure points suggest that comparison with the 'edge-of-town' and 'out of town' industrial sites selected for the TRICS parameters is inappropriate.

Comments on the use of New Lane (south) for delivery traffic routing

During the morning peak period, the route via New Lane (south) is heavily used by schoolchildren and supervising parents, often with toddlers, walking between the residential properties and Warblington School, Fairfield School, Bosmere School, Glenhurst School and Havant and South Downs College. Secondary school children on bicycles regularly add to the hazard.

Closer to the site, Elmleigh Hospital in New Lane caters for a number of extremely vulnerable adults, many of whom are free to walk into Havant town centre.

Excessive speed from rat-run traffic is a regular problem on New Lane (south), a point noted to a limited extent in the Transport Assessment. It should be noted that the six day survey at the Crossland Road junction was carried out in September 2020 when traffic volumes were considerably lower than normal due to the impact of Covid-19 and the town and schools were locked down.

The speed check recording points were immediately to the south and to the north of the Crossland Drive junction, the points at which the application proposes new 'Keep Left' bollards. Speeding from rat-run traffic between this junction and Eastern Road is regularly observed by residents to be considerably higher than the 36mph and 38mph speeds recorded at the Crossland Drive junction. Even without this application, traffic calming measures would be advised in New Lane (south).

Perhaps the most disturbing aspect of this application is the fact that the intended occupier deliberately intends to use the New Lane (south) routing to minimise the risk of missed customer delivery targets. These delivery drivers will be operating under significant schedule pressure.

The mitigation measures proposed, a couple of 'Keep Left' bollards at the Crossland Drive junction and an uncontrolled pedestrian crossing at the Stones Trust Allotments entrance are inadequate. If the routing is to be allowed, more significant traffic calming measures will be required.

In conclusion

I object strongly to this planning application for the former Pfizer site at 32 New Lane.

The intended occupier will generate volumes of inbound and outbound traffic well in excess of levels associated with staff commuting. New Lane is an area constrained by existing traffic pressure points and I believe that granting this application would lead to significant adverse impacts on an already stretched road network. With van drivers under schedule pressure from delivery time commitments, mitigate of schedule risk by using residential rat-runs will compromise the safety of pedestrians and cyclists and exacerbate traffic pollution issues in the town centre.

As a resident of New Lane (south), I can testify that for the past 37 years, no single occupier of any site within the New Lane employment area has generated the level of transport movements directly to the south, into the town centre, set out in the supporting documentation.

I believe this will compound the town centre's peak traffic issues, and given the schedule pressure on the individual drivers, will raise the risk of harm from traffic and pollution to children and vulnerable adults in this residential area and I urge you to reject this application.

Planning Conditions

Should the Planning Committee disagree with these arguments and choose to grant permission, I would ask you to seriously consider applying the following conditions to the permission:

1. To ensure that all LGV and HGV traffic to the site be routed directly through Crossland Drive.
2. To consider restricting through traffic from Elmleigh Road east of Civic Centre Road, placing the same restriction on New Lane south of Crossland Drive and Old Copse Road from its entrance from Crossland Drive.
3. To restrict traffic movements to the "existing" maximum agreed for the site use, with Council officers monitoring compliance during the site's operation.