SW Transport Planning Ltd

Weybridge Business Park, Addlestone, KT15 2UP

Planning Application for 3 Industrial Units

LPA Ref: RU/22/0776

Further Objections on Transport and Highway Grounds

Poets Corner Residents Group

July 2022

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1. Introduction

1.1.1 These Further Objections have been prepared in response to the Technical Note prepared by mode transport planning dated 29 June 2022.

1.1.2 The mode Technical Note responds to the comments made in our original objections report, submitted on behalf of local residents, dated 9 June 2022.

1.1.3 Rather than respond to each point individually, this report focuses on the key areas of disagreement between the parties. It also responds to some of the new information submitted by the applicants.

2. Traffic Impacts

2.1 Adopted Baseline

2.1.1 The applicant continues to rely on the former office use as the relevant baseline for impact assessment. Whilst it is acknowledged that this represents the lawful use of the site, in planning terms, the weight to be given to it requires careful consideration. The former/lawful use of the land is one factor to be considered, as is the current/vacant use of the site, along with any other lawfully permitted use(s) of the site (if any).

2.1.2 The applicant accepts that the site has been vacant for several years and generates no traffic. The return of the site to full office use is a theoretical possibility, but one with no reasonable prospect of being fulfilled. Therefore, the weight to be given to this scenario is very low. It is a matter of fact that, following a long period of vacancy, the true net impacts arising from the future re-use of the site would be felt against the current baseline position of zero traffic generation. This scenario should be afforded significant weight.

2.1.3 The applicant argues that comparison with the former/lawful land use is an industry accepted approach. It can be in certain instances, but for the reasons outlined above, it is not appropriate in this case. Paragraph 2.1.4 of the Technical Note gives the misleading impression that the applicants approach is somehow supported by NPPF. It is not, there is no such endorsement in the Framework for relying on permitted land uses in the assessment of traffic impacts.

2.2 Traffic Generation and Net Traffic Impacts

2.2.1 The Technical Note provides a selection of new/alternative traffic forecasts based on 'Warehousing' trip rates and includes conversions from vehicles to pcu's. Again, the only consideration of net traffic impacts is via comparisons against the former office land use, which for the reasons previously set out are not accepted.

2.2.2 There is heavy reliance on the use of TRICS trip rates. Whilst the use of TRICS is widely established it must be recognised that the resulting trip rates represent only one possible outcome. By definition, TRICS trip rates represent an 'average' calculated from multiple survey results and may not provide an accurate reflection of the development in question.

2.2.3 Table 2.4 of the Technical Note provides a revised forecast of HGV trips, indicating 10 two-way HGV movements in the AM peak and 3 in the PM peak. For the reasons set out in our original objections, this appears low given the scale and design of Unit 100 with capacity for 22 HGVs to be present on-site at any one time. This reinforces the point that TRICS forecasts only provide one possible outcome based on averages from other locations. It remains our view that the proposed development has the potential to generate significant levels of HGV traffic, well in excess of the forecasts presented in the TA and Technical Note.

2.2.4 Notwithstanding the above, Appendix C of the Technical Note provides details of estimated numbers of daily traffic movements (including HGVs) at various locations on the surrounding highway network. These are based on the Applicants proposed TRICS trip generation rates. Two land use options are included as follows.

OPTION A – 100% Industrial Estate
OPTION B – Unit 100 Warehousing, remainder as Industrial Estate

2.2.5 The following Tables contain data extracted from Appendix C highlighting the predicted traffic flow changes on Addlestone Road, Link Road and the A317, based on the 'average' TRICS rates for each option.

Daily Traffic Flows (24hr AADT) - OPTION A - 100% 'Industrial Estate' TRICS Trip Rates

Location	Existing		Proposed		Net Change		% Change	
	All veh	HGV	All veh	HGV	All veh	HGV	All veh	HGV
Addlestone Rd (west of site access)	2256	159	1045	56	1045	56	46%	35%
Link Road (two-way)	4858	98	1045	56	1045	56	22%	57%
A317 (west of Link Road)	26876	1004	958	56	958	56	4%	6%

Daily Traffic Flows (24hr AADT) - OPTION B - Unit 100 'Warehousing', Remainder 'Industrial Estate' TRICS Trip Rates

Location	Existing		Proposed		Net Change		% Change	
	All veh	HGV	All veh	HGV	All veh	HGV	All veh	HGV
Addlestone Rd (west of site access)	2256	159	411	138	411	138	18%	87%
Link Road (two-way)	4858	98	411	138	411	138	8%	141%
A317 (west of Link Road)	26876	1004	656	126	656	126	2%	13%

Source: Appendix C mode Technical Note 29 June 2022

2.2.6 Option A shows that flows on Addlestone Road adjoining the site would increase by 1045 vehicle movements per day, representing a 46% increase relative to existing traffic flows. The increase on Link Road is 22%.

2.2.7 The Option B results show an increase in HGVs of 87% on Addlestone Road and 141% on Link Road.

2.2.8 These are substantial increases and given the current congestion problems at these locations, the impacts of these changes need to be further assessed. In particular, the roundabout at Addlestone Road / Link Road / Dashwood Lang Road / Hamm Moor Lane should be analysed using appropriate junction modelling software to establish the effects of these traffic increases on the queues and delays at the junction.

2.2.9 Similar comments apply to the Station Road / A317 roundabout, where a 13% increase in HGVs is predicted. The results will confirm if mitigation measures are needed in order to satisfactorily accommodate the traffic impacts arising from the development.

2.3 Pedestrian Survey

2.3.1 Paragraph 3.2.2 of the Technical Note reports that data from the manual traffic count at the Addlestone Road / Hamm Moor Lane roundabout noted only 9 to 12 school pupils routing along Addlestone Road at either end of the school day. The local residents' estimate of 100 pupils per day is anecdotal, but based on local knowledge. The likely explanation for the difference is the fact that many children currently short-cut through the site and therefore would have been out of range of the survey cameras placed at the roundabout.

2.3.2 The proposed development will remove the current short-cut, meaning that pupils will have to re-route along Addlestone Road.

2.4 Car Parking Provision

2.4.1 Contrary to comments in paragraph 4.1.2 of the Technical Note, there is no confusion that the Councils' adopted parking standards are based on maxima rather than minima. This is explicitly referenced on our original objections. That said, the adopted standards reflect a range of anticipated levels of demand derived from similar land uses. Our concerns about the potential risk of under provision, leading to displacement of parking off-site, remain.

3. Other Supporting Reports

3.1 Delivery and Servicing Plan

3.1.1 Confirmation, in the Technical Note, of the proposed continuous 24 hour operation of the development is noted.

3.1.2 The absence of known end-users does not preclude an initial forecast of delivery times and routings and explanation of management approach. Our concerns in this respect remain.

3.2 Construction Logistics Plan

3.2.1 The absence of an appointed contractor does not preclude an initial assessment of likely construction methodology, quantities and impacts, recognising of course that the Plan will be developed in more detail later. Contrary to the Applicants' claims in paragraph 5.2.1 of the Technical Note, it is possible and indeed essential that basic levels of information are provided to demonstrate that the impacts of construction can be managed effectively.

3.2.2 Our previous concerns regarding the lack of adequate detail remain.

3.3 Framework Travel Plan

3.3.1 No new information has been provided and our previous concerns regarding the lack of adequate detail and failure to comply with good practice guidance remain.

3.4 Noise and Air Quality Assessments

3.4.1 Confirmation of the basis of the traffic forecasts underpinning the noise and air quality assessments is noted.

3.4.2 Our concerns remain in respect of the robustness and relevance of the TRICS forecasting, particularly in terms of HGVs numbers.

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