

Weybridge Business Park, Addlestone, KT15 2UP

Amended Planning Application for 3 Industrial Units

LPA Ref: RU/22/0776

Further Transport Objections To Amended Application

February 2023



SW Transport Planning Ltd

Registered Office 22 Farriers Close Bramley Hampshire RG26 5AX

Company Number 11021003

Tel +44 (0)1256 883566

www.swtpltd.co.uk

Contents

1. Introduction	2
2. Further Transport Objections	3
2.1 Traffic Generation and Net Traffic Impacts	3
2.2 Parking Accumulation	5
2.3 Outstanding Concerns	5
2.4 Conclusions	6

1. Introduction

- 1.1.1 SWTP Ltd submitted objections to the amended planning application, on behalf of [REDACTED] [REDACTED], in December 2022. Since that time, mode transport planning, on behalf of the applicant, has prepared a Technical Note (dated 24 January 2023) in response to two specific queries raised by Surrey County Council comments. The new Technical Note introduces some new information regarding trip generation and car parking, but fails to respond to other concerns raised by the residents group.
- 1.1.2 This report responds to the new trip generation and parking data and highlights other areas of concern that have not yet been addressed.

2. Further Transport Objections

2.1 Traffic Generation and Net Traffic Impacts

- 2.1.1 The 24 January 2023 Technical Note presents a revised trip generation assessment for the proposed use of the site as a Parcel Distribution Centre (PDC). The analysis focusses on the conventional highway peak periods of 08:00 – 09:00 and 17:00 – 18:00 and compares traffic forecasts for these time periods against the former Office land use.
- 2.1.2 For the reasons set out in our previous objections, comparisons with a former use that ceased several years ago, should be afforded little weight as there is no realistic prospect of that use returning. Comparisons against the current (vacant site) baseline provide a more meaningful measure of the net impacts of the development and should be afforded greater weight in this case.
- 2.1.3 Notwithstanding our views on this point, the following comparisons adopt the same Office baseline as used in the mode Technical Note. In addition to the conventional AM and PM peak hours, other time periods are also considered.
- 2.1.4 A review of the applicants TRICS data for both offices and parcel distribution centres shows that the busiest period for the latter occurs between 07:00 and 08:00. Table 1 compares traffic forecasts for this period alongside the conventional highway peak hours and daily traffic flows. Forecasts for both 'vehicles' and 'PCUs' have been included.

Table 1 - Comparison of Peak and Daily Traffic Generation (Vehicles and PCUs)

Land Use Scenario	PDC Peak (07:00-08:00)		AM (08:00-09:00)		PM (17:00-18:00)		DAILY*	
	Vehicles	PCU	Vehicles	PCU	Vehicles	PCU	Vehicles	PCU
Office (existing)	79	79	257	261	225	226	1756	1769
Parcel Distribution Centre	263	320	155	218	178	212	2671	3796
Net Change (PDC - Office)	184	241	-102	-43	-47	-14	915	2027

*TRICS data for Office covers 7am to 7pm only. Parcel Distribution Centre is 24hr data

- 2.1.5 The table confirms that a reduction in traffic generation is expected (relative to the former office use) during conventional highway peak hours but, during the true peak for the proposed PDC use (7am-8am), there will be a significant increase. The daily forecasts also show a significant increase, with the PDC expected to generate some 3,796 PCUs per day compared with only 1,769 for the former office use; a more than doubling of daily traffic flows.

- 2.1.6 As noted in the table, TRICS data for offices only covers a 12-hour period (7am-7pm). This means that direct comparisons of 24hr forecasts are not possible. However, offices tend to generate low trip numbers after 7pm and over-night, so even allowing for some under reporting of office trips, the table clearly shows there would be a very large increase in daily traffic.
- 2.1.7 It is the significant change in the character of the land use that raises concern. A change from predominately light vehicle traffic operating during conventional office hours, to a use with predominately HGV traffic operating on a continuous 24 hour basis.
- 2.1.8 To put this into context, Table 2 compares the HGV traffic forecasts for the two land uses.

Table 2 - Comparison of Peak and Daily HGV Traffic Generation

Land Use Scenario	PDC Peak (07:00-08.00)		AM (08:00-09.00)		PM (17:00-18:00)		DAILY*	
	Trip Rate	Trips	Trip Rate	Trips	Trip Rate	Trips	Trip Rate	Trips
Office (existing)	0.002	0	0.018	3	0.002	0	0.052	9
Parcel Distribution Centre	0.227	38	0.249	42	0.133	23	4.430	750
Net Change (PDC - Office)		38		39		22		741

*TRICS data for Office covers 7am to 7pm only. Parcel Distribution Centre is 24hr data

- 2.1.9 Note the above HGV trip rates are the sum of vehicle categories 'OGV' and 'PSV' in the applicants TRICS outputs. Office trip rates are taken from Appendix B of the mode Transport Assessment April 2022; the PDC rates are from Appendix B of the mode Technical Note 24 January 2023.
- 2.1.10 Table 2 highlights the large increase in HGV numbers relative to the former office use, in all time periods. As noted in our previous objections such changes have a significant environmental impact and adversely affect pedestrian and cyclist amenity. These are considerations which paragraph 104 of the NPPF requires are taken into account in planning decisions.
- 2.1.11 The daily increase in HGV volumes from 9 to 750 per day represents a greater than 8,000% change.
- 2.1.12 Policy EE1 of the Local Plan requires that development proposals should ***"Ensure no adverse impacts on the amenities of occupiers of the development proposed or to neighbouring property or land uses and provide an appropriate standard of private amenity space"*** (my emphasis in bold text). The major change in the nature of traffic generated and the 24-hour operation of the development brings the proposals into direct conflict with Policy EE1.
- 2.1.13 The failure to provide any mitigation for the traffic impacts created by the development also brings the proposals into conflict with Policy SD4 of the Local, which requires that adverse impacts are mitigated to acceptable levels.

2.2 Parking Accumulation

- 2.2.1 The applicant has submitted revised parking accumulation calculations which confirm that the previously proposed levels of on-site car parking were insufficient to meet the demands of the development. The updated calculation predicts a shortfall of 27 spaces and these have been retro-fitted into the goods vehicle service yard.
- 2.2.2 The TA Addendum (18 October 22) that accompanied the revised planning application included two sets of TRICS trip rates for parcel distribution centres. We note that the set used for the latest parking accumulation calculation contains the lowest of the two daily trip rate forecasts and therefore is likely to underestimate peak parking demand.
- 2.2.3 Also, the use of TRICS data to calculate parking demand carries some risks as trip rate results can vary significantly depending on the search criteria used. Therefore, it should not be used as the sole indicator of parking demand. Where it is used, a margin for variation of at least 10% to 20% should be included. In this case, the estimated maximum parking accumulation is 158 cars, indicating that the on-site parking capacity needs to be increased to at least 174 to 190 spaces to cater for operational needs and daily variations.
- 2.2.4 As noted in previous objections, the proposed level of parking falls significantly below SCC Parking Standards and other comparable developments. SCC standards propose 1 space per 70m²; indicating a requirement for 242 spaces for this development, compared with the 158 currently proposed. And as previously noted, the DHL distribution centre in Slough (one of the sites used in the applicants TRICS analysis) has 798 spaces despite having a smaller gross floor area.
- 2.2.5 These factors confirm that the levels of parking are unlikely to be sufficient to cater for the needs of the development, increasing the risk of overspill parking on surrounding streets. In addition, the proposal to now introduce car parking into the service yard represents poor design as it places cars and their drivers in a space predominately used for the parking and manoeuvring of large HGVs. It also limits the space available for goods vehicles to manoeuvre. This confirms that the proposed scale of development is too large for the site as it cannot satisfactorily accommodate the levels of parking required.

2.3 Outstanding Concerns

- 2.3.1 The following matters, raised in earlier objections, have not been addressed and remain to be resolved.
- a) The Noise and Air Quality reports do not reflect the latest trip generation forecasts for the parcel distribution centre land use.

- b) No provision has been made for LGV/van parking despite the applicants own TRICS analysis showing that approximately 600 LGV movements per day are likely to be generated
- c) No assessment of the environmental impacts of traffic has been carried out
- d) Concerns regarding the lack of detail in the Delivery and Servicing Plan (DSP) and Construction Logistics Plan (CLP) have not been addressed

2.4 Conclusions

- 2.4.1 The latest traffic generation forecasts from the applicant show that the development will generate significantly higher levels traffic compared with the former office use at certain times of the day and over a 24-hour period. This applies to 'all vehicles' but is especially the case for 'HGVs'.
- 2.4.2 The parking analysis confirms that insufficient on-site parking is available and that the levels of parking needed cannot be satisfactorily accommodated.
- 2.4.3 The proposed development will bring about significant changes to the volume and composition of traffic generated by the site, resulting in unacceptable adverse environmental traffic impacts. No suitable mitigation is proposed. The proposals therefore conflict with paragraph 104 of NPPF and policies SD4 and EE1 of the Adopted Local Plan.



SW Transport Planning Ltd

Registered Office 22 Farriers Close Bramley Hampshire RG26 5AX

Company Number 11021003

Tel +44 (0)1256 883566