

Summary of Proof of Evidence related to Traffic

1. INTRODUCTION

1.1 Personal Details

1.1.1 My name is Bob Schofield and I appear at this inquiry on behalf of the Stop Pyestock bLot Act Today (SPLAT) campaign group. I am a long term resident of Fleet and Church Crookham.

I have an Honours Degree in Civil Engineering, I am a Chartered Civil Engineer and a Chartered Member of the Institution of Water and Environmental Managers. I have a degree in law from Reading University

1.1.2 I appear at this inquiry as a local resident and as a member of SPLAT who has spent the last two years analysing and researching the proposed development at Pyestock.

1.2 Issues to be addressed in this Proof of Evidence

1.2.1 The evidence to be presented covers the following areas:

- I. The unreliability of the traffic assessment and the numbers of vehicles that will be generated by the development in the peak hour periods.
- II. The wrongful reliance that is placed on the Certificate of Lawful Use to establish the "fall back position."
- III. The full scope of a Traffic Assessment and potential 24 hour and seven day traffic patterns.
- IV. The benefits of proposed network improvements.
- V. The impracticality of the proposed traffic capping agreements.
- VI. The impracticality of the routing agreement.
- VII. The traffic related impacts of the scheme on the affected residential areas and the local environment.

1.3 The Proposal

1.3.1 The planning application is to convert the substantially disused National Gas Turbine Establishment (NGTE) into a collection of large distribution warehouses all classified as B8 use, operating on a 24 hours per day by 7 days a week. 126,216 m² of new warehouse buildings will be constructed, nearly doubling the building footprint on the site.

1.4 Existing Site/Traffic Conditions

1.4.1 The site is located in the middle of the Strategic Gap separating Fleet from Farnborough, Aldershot and Yately. The area generally comprises open grassland or woodland. The area is predominantly owned by Ministry of Defence (MoD) who manage the land.

1.4.2 Access to the M3 motorway is via Junction 4A, approximately 2.5 km north of the entrance gate. Access to the motorway is via three or four roundabouts, a railway bridge and the single carriageway A327, Minley Link Road.

1.5 Planning History Relevant to Traffic

1.5.1 A brief history of the site's development is explained to demonstrate why the peak hour traffic numbers and the legal fall back position are important to securing planning approval. Previous applications had come under scrutiny by the Highways Agency and risked rejection on the grounds of traffic impacts affecting the M3 motorway.

2. ASSESSMENT OF PEAK HOUR TRAFFIC NUMBERS

2.1 The case is made that the Appellant has not performed an adequate traffic assessment as defined by the DfT due to his preoccupation with Peak Hour traffic numbers, primarily to avoid liability for road improvements.

2.2 It is asserted that the Appellant has not reassessed traffic impacts against his own developing site layout and design. It is demonstrated that the peak hour traffic numbers are seriously understated because of the significant shift in the size of the individual sheds. This understatement is exposed by using the Appellant's own traffic ratios and an analysis from first principles.

3. RELIANCE ON THE LEGAL "FALL BACK" POSITION

3.1 It is challenged that the Appellant has convincingly established a legal fall back position. It is argued that reliance on the fall back position is not one of simple technicality, but of practicality. Not only has it to be demonstrated that the buildings could be refurbished, but that there is real commercial potential for their re-use for research and development purposes.

3.2 It is asserted that the Appellant has exaggerated the historical level of employment on the site by ignoring the fact that the Certificate of Lawful use clearly identifies that the Appellant only has development rights to Zone 1 identified in the Certificate and that some 260 staff were transferred to the "Hub" development retaining their "traffic rights".

3.3 The Appellant's reliance on recent traffic surveys to support his argument of historic traffic levels is challenged.

4. AN APPROPRIATE TRAFFIC ASSESSMENT - 24 HOUR TRAFFIC PATTERNS

4.1 It is demonstrated that the Appellant has not undertaken a traffic impact assessment in accordance with DfT guidelines. Without traffic patterns on a 24 hour or 7 day a week basis the total impact of the development cannot be assessed. A carbon assessment and a traffic accident assessment, have been ignored. The latter is of

particular concern because of local road network congestion and the much higher than national average accident rate for J4A of the M3.

Until such time as an appropriate traffic assessment is carried out and a 24 hour, 7 day a week traffic pattern is established it is not possible to undertake a thorough assessment of the consequences of that traffic in relation to noise, pollution, environmental and health impacts.

5. THE BENEFITS OF PROPOSED TRAFFIC NETWORK IMPROVEMENTS

- 5.1 It is argued that the proposed traffic improvements are solely for the benefit of the Appellant and do not offer the suggested benefits to the highway network. In particular, the detrimental impact of the proposed new roundabout on the New Ively Road is highlighted. It is maintained the junction is in breach of Local Planning Policy T15 (ii).

- 5.2 It is contested that no meaningful evidence has been presented by the Appellant that altering the roundabout on Minley Link Road to a signalised junction will have any beneficial impact. Modelling by the County Highway's consultants treats the roundabout in isolation. In reality it is part of a complex junction comprising two roundabouts interlinked by a narrow railway bridge. It is questioned that if the improvement is solely to improve "geometry", as suggested, how HGVs currently negotiate the roundabout.

6. PROPOSED CAPPING AGREEMENTS

- 6.1 It is contended that the proposed "caps" on the traffic numbers supersede and neutralise all previous calculations and yet are not substantiated.

- 6.2 The preliminary Draft Capping Agreement appears to depart from the proposals included in the ES and significantly increases the number of vehicles that would be allowed. If adopted, as

proposed, the traffic numbers would significantly exceed not only those presented in Schedule 13 of the ES, but also the “legal fall back” position.

- 6.3 It is asserted that if the application of the caps is not absolute, so as to physically limit the number of vehicles on the highway network, the application of a financial penalty will not inhibit the traffic numbers.
- 6.4 The practicality of a monitoring and control system on a multiple occupancy site is questioned.

7. ROUTING AGREEMENT

- 7.1 We assert that the proposed Routing Agreement is neither practical nor enforceable. Regular congestion at J4A of the M3 will force traffic to use alternative routes to gain access to or egress from the Site.
- 7.2 Evidence is presented that enforcing third party hauliers to comply with a routing agreement is not practical.

8. TRAFFIC RELATED IMPACTS OF THE DEVELOPMENT.

- 8.1 It is discussed that the number of vehicles and their pattern of movement are essential facts to establish the consequences of the development. Associated noise, pollution, environmental and health implications have a direct correlation with the number and pattern of vehicle movements
- 8.2 Overall the concern exists that the traffic numbers have been underestimated and do not represent a robust, worst case assessment. In reality, the traffic network will become even further congested and the proposed road network improvements, far from having a beneficial effect for the general road user will, in fact, introduce new

and unnecessary hazards. In particular the proposed traffic “caps” appear to exceed not only the worst case predictions, but also the legal fall back position. This level of traffic has not been fully assessed within the Environmental Statement and as such the Appeal must be rejected for lack of certainty.