

Our ref: GE/MK/ K075-05

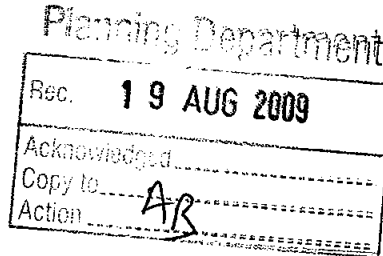
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Dear Andrew

**TOWN AND COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004
FULL PLANNING APPLICATION BY KENMORE CAPITAL PORTFOLIO LTD
PROPOSED CONSTRUCTION OF A REGIONAL DISTRIBUTION CENTRE (RDC),
SOLSTICE PARK, AMESBURY. REF S/2009/0794**

I refer to the above application and would be grateful if you would accept this letter as a response to the various highway/ traffic objections that have been lodged to this application by a number of parties.

My colleague (and agent for the application) Martyn Smith of Pegasus Planning Group has written separately in response to a number of planning issues and therefore I would be grateful if you would consider this letter as part of our client's planning and highway response.

First it must be clear that the A303 is not a trunk road in name only. It serves a major strategic function and is undoubtedly of a much higher standard (in terms of width, alignment and access/junction arrangements) than, for example, the A36, which is also a trunk road and which was recently the subject of detrunking consideration. Nevertheless you will obviously be aware that it was decided that even that lesser standard road should remain a trunk road, not simply in "name" but also in respect of its "function"

Objections have been made on the basis that the A303 is not suited to an RDC type of development but can I draw your attention to the Department of Transport Freight Best Practice Guide suite of documents including one entitled "Local Authority Freight Management Guide" published in 2007. This identifies (at Section 7.3) that:-

"In each authority the motorway and trunk road network managed by the Highways Agency forms the highest level of the preferred lorry routeing network."

National Planning Policy advice in PPG13 of course has a similar theme in stating that developments generating substantial freight movements should be located where there is adequate access to trunk roads.



Neither of these policy/guidance documents makes any differentiation between “types” of the trunk road network (which vary from the highest standard trunk roads which are effectively motorways, to single carriageway roads). Neither has the abandonment of the Stonehenge improvement scheme altered the status, nor function, of the A303 - the Secretary of State has clearly had regard to the existing standard of the A303 to the west of Solstice Park and has made his determination on that particular road scheme with the benefit of that knowledge.

Many of the objections refer to the level of congestion at Countess Roundabout – in truth such congestion occurs mainly on a relatively few number of summer weekends or when a specific accident or breakdown occurs. As is often the case when congestion occurs, it creates the perception that it is frequent and is greater than the reality. Accidents or breakdowns can occur anywhere on the highway network and the implications of such incidents occurring on the A303 are no different than if they occur on other strategic roads.

Furthermore, because freight companies require a degree of reliability when operating their businesses, they will inevitably seek to minimise operations when delays are likely, but in any event the number of additional vehicles associated with this development is “de-minimis” when compared with the total level of traffic on the A303 and so will not materially affect any existing levels of congestion.

Some objections refer to the potential impact of 3900 vehicles per day resulting from the development (the Transport Assessment actually states 3832!) but fail to acknowledge that, if the same area were to be developed for smaller B1/B2/B8 units (ie. a Churchfields type of development), the impact would be 7000 vehicles per day (table 6.8 of the TA for your reference). The TA also makes it clear that the majority of the HGV movements are likely to be already on the highway network and will therefore be “diverted” traffic rather than “new” traffic.

You may be aware that complaints were levelled at the Highways Agency about their “no objection” response to the previous RDC application, and as a consequence, we were required to undertake additional analysis to support the resubmitted RDC scheme. That additional analysis considers both Countess and Longbarrow roundabouts. Following the submission of this information, the Agency has reaffirmed its view that the proposed RDC development will have little or no impact, and your own Council’s highway officers reiterate their previous view that the traffic impact is acceptable.

Concerns have been expressed about breakdowns at the RDC resulting in queuing back to the A303. Of course breakdowns in any system cannot be ruled out, but in any modern purpose built facility such occurrences are likely to be rare. The objections seek to create the impression that there will be disruption on regular occasions but there is no evidence that this is likely - to the contrary, modern RDC vehicles and equipment represent the life blood of the logistics industry and their maintenance is, not surprisingly, of the highest quality and frequency. Quite simply, “downtime”, represents lost income, not something that any business in the industry can willingly afford.

Tintometer assert that “*entrance capacity is limited*”, however the entrance is purpose designed and significant queuing space is available in the event that there should be any delay in HGVs being able to access the site. The distance between the gatehouse for the southernmost RDC building and the site access onto Equinox Drive is approximately 210m. Allowing some space between queued vehicles there is space for at least 11-12 vehicles to queue at the gate without even encroaching onto the extension of Equinox Drive.

The approach to the second building is slightly shorter (*about 160m*) but even so, this still gives space for 8-9 vehicles to queue before the queue reaches Equinox Drive.

There is then a distance of some 275m between the site entrance and the Solar Way junction. This allows a further 15-16 vehicles to queue on Equinox Drive without extending back to Solar Way. Thus, in excess of 25 of the very largest HGVs (*and they may not necessarily all be the very largest*) can queue without impacting even on Solar Way.

There is a further length of Equinox Drive of approximately 275m down to the A303 roundabout which, in extremis, would provide queuing for a further 16 vehicles. Thus, using Tinotometer's example, a delay of up to 30 minutes would not affect any of the existing users of Equinox Drive/Solar Way and if in the highly unlikely event the RDC entrance were to be completely closed for an hour and all lorries were forced to queue on the highway, the queue would not stretch back to the Solstice Park/Equinox Drive roundabout, let alone the A303.

We therefore reject as totally unfounded objections based on the fact that any delay of 30 minutes will cause HGVs to queue on the A303

There is of course additional queuing and parking spaces within the site (173 lorry parking spaces in addition to the 100 "docking bays") which these calculations do not take account of, and we would reiterate that the very function of an RDC is one where movements and distribution are undertaken at the highest level of efficiency for good commercial reasons.

No business which will have invested many tens of millions of pounds in an RDC at Solstice Park will do so with the slightest hint that it will not operate efficiently and the application plans have been specifically designed by a business (Kenmore) with specific experience of the logistics industry.

With regard to traffic management and routeing, it is perhaps easy to challenge this on the basis that it will be ignored or that the technology will fail. In the first instance vehicle movements will be accurately monitored and the technology is already tried and tested – it is the same technology used to enforce London's congestion charge system and car parking arrangements and enforcement at Heathrow.

The routeing agreement will limit the number of HGVs from the RDC using local roads (Porton Road in particular). The limit has been set at a level which will not have any material impact when compared to existing traffic flows or traffic flows from the already permitted development – if the site were to be developed for a Churchfields type of development, not only would the total traffic generation be much greater, a routeing agreement could not be imposed to limit flows on the local roads.

In addition, weight limits are proposed and, whilst these do not affect roads which are likely to be used by HGV's from the RDC, they have been offered so as to sit alongside the Routeing Agreement to provide additional protection for these routes and will provide relief for these roads from other HGVs in Amesbury "Barred routes" are also identified to provide protection to the various communities along those routes.

The suggestion that weight limits and routing agreements will be ignored on the basis that this is already happening elsewhere (Downton is referred to) fails to recognise key differences. There are, at Downton, no routing agreements in place which would have a commercial impact on any delivery business which choose to ignore such agreements (notwithstanding any breach in

the law). There are also no monitoring systems in place which automatically record any flouting of the restrictions (enforcement has to rely on the visual evidence of a police officer).

It is against the background of the above that the monitoring arrangements and enforcement penalties (which are severe) are a practical way to manage traffic and, because these measures are the subject of specific control via a legal agreement if the limits have been breached, they are enforceable.

Some objectors have referred to other routes as being affected (such as the A36 or A350) but these are unlikely to experience significant additional traffic as a consequence of this proposal but in any event are either a Trunk Road or are Primary Routes to which the majority of freight traffic should be directed in any case.

In summary therefore:-

- Neither the Highways Agency, nor your own Highways Department, raises any objection in relation to the possible impact that the development might have on these roads. Their consideration of the application proposals have been made in the full knowledge that objections have been made to the proposals on highway grounds.
- If the site were to be developed for smaller units (a Churchfields type of development, total daily traffic to/from the site could be much higher (almost double) and could not be effectively controlled with a routeing agreement.
- The route monitoring arrangements will use tried and tested technology and will be effective.

I trust this is of assistance but if you require any further information please do not hesitate to contact me.

Yours sincerely,



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Director

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