

Deputation from Mr Comlay

If, after consideration of the points raised, you have a predisposition for how you might vote on this application, then **barring a deep dive into the conflicting traffic data**, you could be minded to approve. The promise of a significant number of jobs on a vacant site in need of regeneration could be too tempting to refuse. The Regeneration Strategy identified this type of logistics business as one which should be encouraged, albeit at Southmoor, where there is already an appropriate outline application at Brockhampton West, or at Dunsbury Park, where a competitor has already wisely set up.

You are deciding whether to site a high volume traffic generating business in an employment area surrounded by residential streets and properties, with three primary schools and three NHS facilities within one kilometre distance. Access to the trunk roads essential for its commercial traffic is heavily constrained and often gridlocked.

‘Last mile delivery’ is a misnomer. The applicant’s data shows that 95% of the schedule-critical deliveries leaving the site will need to fight their way to the A27 or the A3M in order to service destinations from Winchester to Worthing, and to Woking in the north. Residents of the surrounding streets know just how difficult this can be and the proposed occupier would very soon find out.

The ‘proposed occupier’ has provided their **definitive** daily traffic movements in an **easily missed but critically important** single page appendix. All subsequent predictions are derived from this source, creatively but inconsistently embellished to mask the fact that the base data does not match the occupier’s 24/7 3 shift operating model.

The definitive source shows 2,415 daily vehicle movements, a number robustly defended as matching the company’s proposed business model for the site. For **commercial** vehicle movements, it possibly does. The fundamental flaw is that there is no evidence in the definitive source for the **personal** vehicle movements of staff associated with the proposed shift pattern. At peak capacity, with 600 shift workers and 866 van drivers, the traffic analyst’s own projection of 72% private car use should show over 2,000 staff vehicle movements in the daily trip generation data, including a clearly observable peak at the overnight shift handover. However, between 11 pm and 1 am, the data shows just **8 HGVs** and **1 car**.

The note from the Transport Consultant published August 26th take an eleventh-hour step of moving the entire shift pattern forward by one hour to attempt to explain the missing night shift arrival numbers, leaving the evening shift departures still unaccounted for. A subsequent ‘clarification’ seen on Sept 6 remains confused.

The Trip Generation data in the Transport documentation has been reworked multiple times during the last six months, acknowledging inconsistencies in previous presentations, but still failing to obscure the fundamental flaw with the ‘proposed occupier traffic data’ which remains the definitive source.

It is worth noting that the Environmental Health consultee has also commented on the ‘fluidity of the traffic estimates’, observing that ‘they have demonstrably varied with time’.

Government guidelines demand that Trip Generation data for planning purposes should include all vehicle movements associated with an application. When staff vehicle movements are accounted for, the traffic movements at the three site gates will far exceed the 2,415 quoted and you must recognise that all of that traffic must traverse a heavily used footpath and a strategic cycle lane.

The lack of convincing evidence of the accounting for staff personal vehicle trips represents a fundamental and significant error in the information given to the committee,

Two weeks ago, Basingstoke council was forced to revoke its planning consent for an Amazon warehouse after a legal threat by Dummer Parish Council which challenged the legality of the decision, based on what it considered to be **an error in the information given to the committee.**

The Committee Report before you notes that *“there remain a number of clarifications being sought from the applicants Transport Consultant”*. A vote to approve this application before the information given to you is unambiguously clarified would be a decision taken at significant risk.

The Constitution advises that you *“come to your decision only after due consideration of all of the information reasonably required upon which to base a decision. If you feel there is insufficient time to digest new information or that there is simply insufficient information before you, request that further information. If necessary, defer or refuse.”*

For your own sake, as the Planning Committee, you should defer. For the town’s sake, you should refuse.