

Madam,

1. I am a Hart District Councillor for the Church Crookham East ward. Church Crookham is an area that would be adversely affected by an increase in through traffic if this appeal were to be allowed. Although other areas both around and away from the development site will also be adversely affected I come before this Inquiry in the main to represent the concerns of the vast majority of those residents living in Church Crookham who have made their views known to me.
2. As I shall explain in this statement; Church Crookham is not afforded any protection or mitigation by the draft Section 106 agreement on traffic which is being put before this Inquiry.

Ineffectiveness of movement caps

3. Local residents are very familiar with the ineffectiveness of movement caps as a mechanism to constrain the growth of otherwise detrimental development. We only need to look at the cap imposed on aircraft movements from Farnborough Aerodrome to know that they only last as long as is convenient for the operator. A site operator can subsequently apply to increase or remove what they then claim to be an artificial planning constraint. This happened recently for the cap on weekend flights at Farnborough and the SoS had no hesitation to overturn the restriction on the grounds that it was unreasonable to restrict the Aerodrome from reaching its full potential. Locally there is every expectation that the same concession would be made for Hartland Park if they made a similar application in the future.
4. If this appeal were to be allowed by the SoS then she would be agreeing to the development of a distribution complex which would clearly have the capacity to sustain a higher number of HGV movements than the 800 being proposed. The logic which seems to be applied when a developer comes back to subsequently increase or remove a traffic cap is that the original cap was just an interim measure. Consequently the proposed 800 cap on HGV movements offers no long term protection to residents or the users of the road infrastructure.
5. At some future date the developer could come back and claim that as the original application was granted for a development of this scale then the impact on local people and on the local roads, if the development were to operate at maximum capacity, must have been implicitly acceptable at the time the application was considered. However, no evidence has come forward to suggest that the road system could cope with the level of traffic that this development would generate if allowed to run at full capacity. Hampshire County Council (HCC) only offer the opinion that they believe the roads could cope with up to 800 HGV movements per day, way below the full potential capacity of the proposed development.
6. Consequently the only reasonable conclusion that I believe can be reached is that the appeal be dismissed on the grounds that the development proposed is too large. The capacity of the road system could not cope with the traffic which would be generated if the site were to approach full operational capacity. This heightened level of traffic would further increase the degree of unacceptable impact on the quality of life for local residents, so therefore a development of this scale must be deemed unacceptable.

Lack of constraint on 2 axel vehicles

7. The proposed legal agreement between the developers and HCC makes no provision to limit the number of two axel vehicle movements to and from the site. As far as the legal agreement goes there can be an unlimited number of such vehicle movements per day. It is not possible therefore to conclude whether or not the road infrastructure will be able to cope with the impact of this development.
8. The purpose of a distribution warehouse is to haul in goods from production and import centres and to distribute the goods out to retail outlets. The distribution of goods to retailers will often involve the use of two axel vehicles. A simple comparison between the load capacity of a HGV and a 7.5 tonne van will indicate that there could be many more 2 axel vehicle movements than HGV movements. However, the legal agreement that has been drawn up and 'agreed' by HCC offers local residents no protection from the movements of two axel vehicles.
9. The justification for not including 2 axel vehicles in the agreement is that any non-compliance with the routing and capping agreement can not be policed. There is no suggestion that they don't contribute to any adverse impact on the roads or on local residents. Rather HCC are simply taking the view that as 2 axel vehicles are difficult to monitor they have chosen to ignore their accumulative impact.
10. If after this Inquiry the SoS is minded to allow the appeal then she should be advised to include two axel vehicles in the 800 HGV limit. In future years GPS monitoring devices and vehicle identity tags may very well make it possible to also monitor the routing and number of such vehicles. Therefore it is unreasonable to leave them out of the routing and capping agreement just because today they can't be monitored.

HGV Routing

11. The Section 106 legal agreement defines an 'Approved Route' as only being 'from' the site. The definition does not include routes 'to' the site. If there are no approved routes to the site then consequently there are no constraints on how any vehicle, HGV's included, can get to Hartland Park.
12. We can assume that great care was put into preparing this legal agreement and that competent legal experts were involved with the drafting of these terms. Therefore, it can not be a mistake that the proposed legal agreement makes a distinction between routes to and from the site. Such agreements are after all carefully constructed. The lack of approved routes to the site in this legal agreement must in my view therefore be intentional.
13. Local residents know that TAG, the owner & operator of Farnborough Aerodrome, has no control over the routing of flights once they leave their local Aerodrome Traffic Zone (ATZ). So it will come as no surprise that if the local airport can't control where aircraft fly then the operator of Hartland Park is going to have little control over the routing of lorries on their journey to the site.

14. If, as is clear from the proposed legal agreement, HGV's will be unrestricted in their choice of route for their journey to the site. This will have a serious adverse impact on the local roads and on the quality of life for local residents. We must not lose sight of the fact that this would be a 24x7 operation which has a peak of activity in the early hours of the morning.
15. In particular the legal agreement does not prohibit any HGVs from coming through Church Crookham, whether they are heading to or from the site. The map of prohibited lorry routes agreed by HCC does not prevent HGV vehicles from driving through Church Crookham. The route via the Ively Road, across the Norris Bridge and then either up through Fleet or out through Church Crookham although not the recommended route is not specifically prohibited either.
16. Any HGV or two axel lorry can get to and from the site at any time of day or night. As the proposed legal agreement is worded there would be no restrictions on them doing so. I urge you Madam Inspector to please come and see both of the Aldershot Roads, the one in Fleet and the one in Church Crookham, as part of your site visits. I ask that you try to imagine the impact on local residents of HGVs passing too and fro along these two roads throughout the night.
17. A further major deficiency in the proposed legal agreement on traffic routing is that HCC accept that the restrictions on routing can be ignored "in the event that access to the M3 becomes unavailable." It is not clearly defined what 'unavailable' means in this context but I'm sure that HGV drivers will take it to mean those times when the M3 is not free flowing. Sadly this will be quite often.

Satellite Navigation aids

18. Satellite Navigation aids are a ubiquitous tool used by many drivers and particularly by those making long distance deliveries. They help ensure that the drivers can follow the most expedient route and will even allow the driver to avoid congestion as it develops.
19. Hartland Park will have a southerly entrance on to the Ively Road and it is unlikely that the majority of satellite navigation aids, if indeed any, will be able to distinguish that this is not the approved entrance for commercial vehicles. Most Sat Nav devices will therefore factor this access point into their routing recommendations. Remembering that the developer does not propose to restrict the routes taken to the site and HCC will allow the routing agreement to be ignored if the M3 is unavailable – it is instructive to see how such devices would route traffic to/from the site.
20. HGVs heading from the west along the M4 and travelling to Hartland Park are routed to the north gate through Bramshill, down past the entrances to both Elvetham Heath and Ancells Farm (both major residential developments) and along the Cove Road (B3013). If routed towards the south gate of Hartland Park they are routed through Hartley Wintney (A323) into Fleet, along Reading Road North, across the Oatsheaf junction, and along Aldershot Road (in Fleet). For a HGV travelling to Hartland Park neither of these two routes is prohibited. Even if they were to be prohibited the driver of the HGV may not know of the restriction until he/she gets here.

21. Consider traffic heading up along the M3 from Southampton. If the M3 is blocked then a satellite navigation aid programmed to avoid the congestion on the M3 will direct traffic to the southern entrance of Hartland Park by exiting the M3 at junction 5. The lorries would then be directed along the A287 and through Church Crookham via Redfields Lane and along Aldershot Road (Church Crookham). Again there is no provision in the Section 106 agreement to protect the residents of Church Crookham from such movements going both to and from the site.
22. This impact on local residents would be reduced if there was no southern entrance to the site as satellite routing would be less likely to direct traffic through Fleet & Church Crookham. By not having such an ambiguity with regards to the site entrance it would remove the likelihood of a navigation device being unable to distinguish that the southern entrance is not the approved point of ingress for commercial vehicles.

Conclusion

23. In conclusion, as proposed the development at Hartland Park is going to result in an unacceptable loss of amenity for the residents in both the vicinity of the site and across the wider area of Hart. The proposed legal agreement which has been drawn up between the developers and Hampshire County Council, dated 24th November fails to mitigate this impact.
24. Consequently I urge you Madam Inspector to recommend to the SoS that she dismisses this appeal. Thank you.

Cllr. James Radley,
Hart District Councillor for the ward of Church Crookham East.