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# Peter Evans Partnership

Transport Planning and  
Traffic Engineering Consultants

20<sup>th</sup> March 2018

Our Ref: 2833/R/HS/JM

The Planning Inspectorate  
National Infrastructure  
Planning  
Temple Quay House  
2 The Square  
Bristol  
BS1 6PN

Dear Sirs

## **Application by Port of Tilbury London Limited for an Order Granting Development Consent for a Proposed Port Terminal at the Former Tilbury Power Station ('Tilbury2')**

### **Amazon UK Services Interested Party Reference: TIL2-AFP0005**

We write on behalf of Amazon UK Services Limited who operate a warehouse facility at the London Distribution Park, Tilbury. This is a strategic warehouse for Amazon and has capacity to employ up to 7000 staff. The facility is immediately east of the A1089 roundabout junction with St Andrews Road, and Dock Road, known locally as the 'Asda roundabout'. Therefore as a result of the position of the Amazon site the Tilbury2 proposals may have an impact on Amazon in terms of traffic.

We have a number of matters that we would like clarification on in terms of transport analysis and assessment undertaken to date.

In accordance with the requirements of the Rule 8 notice we are writing to provide comments on the specific issue of Transport Impacts and confirming that we would wish to participate in the hearing session in this regard. However we are engaging in discussions with The Port of Tilbury and their transport consultants i-Transport, with a meeting also proposed, to establish if additional information can be provided and if our concerns can be addressed in advance of the hearing session.

We would be grateful, as transport advisors to Amazon, if further information could be sent to Peter Evans Partnership at the above address marked for my attention, and copied to Ms S Page, at DWD, 6 New Bridge Street, London, EC4V 6AB.

We are concerned that the proposals particularly at the A1089 Asda roundabout do not address existing shortcomings and the proposed development could prejudice the current and future operation of the Amazon site. Our initial comments are set out in this letter.

### **Traffic Impact**

#### ***Baseline Traffic Flows***

The assessment submitted indicates that Amazon traffic has been taken into consideration in the traffic analysis. No surveys have been carried out post opening of the Amazon warehouse and therefore predicted traffic flows have been used. The flows used are not set out in the documentation. It is assumed that these have been derived from the traffic analysis undertaken as part of the Amazon planning application, however confirmation of this is required as no raw data is provided.

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Peter Evans Partnership Limited

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***Tilbury2 Traffic Generation and Periods for Assessment***

The total development trip generation is set out in table 6.19 of the i-Transport Transport Assessment for Tilbury2. This indicates that the Tilbury2 peak hours would occur at 07.00-08.00 and 17.00-18.00. However the sum of the individual development plot traffic generation tables suggests that the evening peak hour may actually occur at 18.00-19.00. Confirmation of the traffic generation figures provided in the Assessment and used in the analysis are therefore required.

Amazon peak shift changeover periods occur at 07.00-08.00 and 18.00-19.00. Therefore this influences the peak hours recorded at the Asda roundabout. Paragraph 7.4.11 of the i-Transport Assessment for Tilbury2 incorrectly indicates that Amazon are not permitted to start or end shifts between 07.30-09.00 and 16.30-18.00. There are restrictions on Amazon shift changeovers, however the correct times are 08.01-09.29 and 16.01-17.59.

The Transport Assessment identifies the strategic road network peak hour at 07.00-08.00 and the local road network peak at 08.15-09.15. However at the Asda roundabout only the later 08.15-09.15 peak hour has been fully assessed. This is not the proposed morning peak hour for Tilbury2. Given that the strategic road network peak hour and Amazon peak hours are also both an hour earlier, the same time period as the Tilbury2 proposals, confirmation of the impact in the hour 07.00-08.00 should also be provided.

The evening road network peak hour has been identified as 17.00-18.00 in the Transport Assessment. This may not be the proposed peak hour for Tilbury2 and is not the peak hour for Amazon. Therefore to fully assess the impact of the Tilbury2 proposals on the local road network, especially at the Asda roundabout, an assessment of 18.00-19.00 should also be undertaken.

The Transport Assessment Scoping Note indicated that traffic assessment would be undertaken over the periods 07.00-10.00 and 16.00-19.00, with detailed analysis of the peak hours. Therefore confirmation from this wider time period assessed that the appropriate peak hours have been reviewed in detail is sought. Because of the nature of the uses at the port and the extended peak period on the wider road network including the M25 it would helpful if a full review of the traffic for each hour of the peak period could be undertaken.

***Traffic Impact Assessment Results***

Traffic capacity testing of the Asda roundabout shows queues will increase, especially in the morning peak hour. However the traffic modelling is compared to the capacity results recorded in the Amazon modelling, with the reference that Highways England accepted the Amazon assessment in terms of queuing and RFC. Thus 'they represent a threshold for determining the acceptable impact at this junction' (para 7.4.11). Whilst it is the case for the time periods assessed no assessment has been undertaken of the 07.00-08.00 and 18.00-19.00 peak periods.

As part of the Amazon planning permission, restrictions are in place as to when staff shift changeovers are permitted to occur. As a result of the permitted Amazon shift changeover times, limited Amazon traffic would be on the road network in the peak hours assessed for the Asda roundabout. Confirmation is sought that Amazon has been taken into full consideration in the assessment undertaken to date.

In conclusion confirmation that the appropriate time periods on the road network have been assessed is sought to fully understand the traffic impact of the Tilbury2 proposals.

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**HGV Parking**

An additional operational query relates to the ability of the Tilbury2 design to accommodate/hold traffic as it arrives. Illegal truck parking in the area is already a concern identified by the Freight Management Committee held by Thurrock Council. If there is insufficient holding or parking areas this could further displace vehicles and impact on local roads.

**Construction Traffic**

The provision of a Construction Traffic Management Plan is welcomed. The Assessment states that construction staff are likely to arrive outside of the traditional road network peak hours and HGV traffic would also where possible be outside the peak hours. However has consideration been given to the peak hours and shift changeover times of other local businesses including Amazon?

**Sustainable Travel**

The proposal for the implementation of a Travel Plan is welcomed, as is the continued involvement in the London Distribution Park Travel Steering Group. It is assumed that any Travel Plan would cover the whole of the Port operation and not just the Tilbury2 site.

A new bus stop for bus service 99 is suggested. However there are no proposals to enhance existing public transport provision for staff – bus, train, or ferry. This should be considered in more detail with the aim of working with other occupiers.

**Conclusion**

Insufficient traffic information for the local road network and no details of the full morning and evening traffic impact over the peak three hour periods noted for traffic assessment means that further information should be provided to allow a comprehensive transport review to take place.

We trust that our comments are taken on board when this application is being considered. For the avoidance of doubt we reserve the right on behalf of Amazon to object to the proposals unless further information on the traffic impact at other key peak periods is confirmed.

We would be grateful for confirmation of when the next stage of the DCO process and Hearings are to take place so that we can attend if appropriate.

Yours sincerely



**ANDREW KENYON**  
**Peter Evans Partnership Limited**