

TRAFFIC & SAFETY REPORT
FOR THE PROPOSED ALDI FOODSTORE
AT PACIFIC DRIVE, SOVEREIGN HARBOUR NORTH
(EBC Planning Application No. 220849)

SOVEREIGN HARBOUR RESIDENTS ASSOCIATION

05 DECEMBER 2022

SHRA

Sovereign Harbour Residents Association



Introduction

This report supports Sovereign Harbour Residents Association's opposition to the planning application by Aldi to open a foodstore on Pacific Drive, Sovereign Harbour North, Eastbourne (EBC Planning Application No. 220849). It summarises our concerns regarding traffic congestion and safety and refutes many of the findings in Aldi's Planning Statement, prepared by Planning Potential, their Transport Assessment report, prepared by Connect Consultants, and their Noise Impact Assessment, prepared by Sharps Redmore.

Specifically, this report demonstrates how the increased traffic volumes, consequent traffic congestion and significant risk of traffic incidents impact negatively on the social and environmental conditions of Sovereign Harbour North, contrary to the objectives of the National Planning Policy Framework (NPPF).

Crucially, paragraph 111 of the NPPF is clear *that 'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'* The NPPF requires that development should be refused where *'adverse impacts of [approving development] would significantly and demonstrably outweigh the benefits.'* This Traffic and Safety Report will demonstrate the unacceptable impact on safety and the severity of risks that outweigh any such benefits.

This report covers:

1. Road layout
2. Traffic volume monitoring
3. Pedestrian volume monitoring
4. Traffic flows
5. HGV delivery vehicles
6. Impact of potential traffic congestion and collisions on Pacific Drive
7. Likelihood of traffic congestion and collisions near Aldi
8. Conclusions

Appendix I: Traffic flow monitoring

Appendix II: HGVs at Hampden Park

1. ROAD LAYOUT

1.1 Sovereign Harbour North is a mainly residential development with 2,052 properties and an estimated 5,000+ residents (based on the average household size in the south east of 2.45).

Pacific Drive is the main artery into the estate. Crucially it is the only entrance/exit for vehicles

onto Pevensey Bay Road, and is actually a cul-de-sac. The entrance to the proposed Aldi site is less than 100 metres from the mouth of this cul-de-sac.

1.2 It is disappointing to note that, in Aldi's Planning Statement, reference is only made to the site being '*located in a built-up neighbourhood, the primary use being residential with dwelling houses and flatted development to the south of the site across Pacific Drive.*' (2.10) There is no reference to the close proximity of residential properties to the Aldi site or, most importantly to the fact that Pacific Drive is the only entrance and exit to a development of nearly 5,000 people.

1.3 The section of Pacific Drive that is the approach to the proposed Aldi site is a single carriageway with a roundabout at either end. To the west, the roundabout that links Pacific Drive with Harbour Quay provides a refuge island for pedestrians crossing Pacific Drive to attend the medical centre located on the corner. Traffic to and from Aldi will pass over this crossing. Further along Pacific Drive, 70m beyond the entrance to Aldi, is a ramped refuge island to reduce traffic speeds and provide a safer pedestrian crossing point.

1.4 Pacific Drive is a bus route for the 5 and 5A, the only public transport directly serving harbour residents. Contrary to Aldi's statement, this bus service is only once hourly (once every two hours on Sunday) rather than twice an hour as alleged. Pacific Drive is also a designated cycle route with dual use footpaths for pedestrians and cyclists.

1.5 Along the south side of Pacific Drive are residential properties that face directly onto the road. On the north side is the Harbour Medical Centre. Its single car park access onto Pacific Drive is just 45 metres to the west of the proposed Aldi site entrance. Beyond the proposed store entrance, plans have been submitted for the development of a care home and a block of retirement apartments, each with a single access point on to Pacific Drive. Beyond these there is a small park and a residential development. Site 7a, the land between the medical centre and the park, has always been designated for development for employment purposes.

1.6 We accept that this land is available for appropriate development, but we do not accept a supermarket foodstore, with its only access onto Pacific Drive, as appropriate. On Aldi's own website, their criteria for new sites are either retail parks, town centres or main roads. They specifically require '*prominent main road frontage with good visibility and access*'. Pacific Drive provides none of these.

2. TRAFFIC VOLUME MONITORING

2.1 For their Transport Assessment, Connect Consultants monitored traffic flows at various points on Pacific Drive and Pevensey Bay Road. There is clearly a science to measuring traffic, and their report contains data of TRICS, TEMPRO and various other databases to which we do not have access. We do however dispute certain of the assumptions used as starting points.

2.2 Key findings in the Transport Assessment draw direct links to the traffic flows on Pacific Drive at the proposed Aldi site, and at Aldi’s store at Hampden Park Eastbourne, yet these sites have markedly different layouts impacting customer vehicles and HGV service deliveries. Aldi’s Planning Statement states that the Hampden Park store *‘is trading well and indeed there are often times when it is at capacity.’* (1.3)

2.3 We have followed Connect’s lead and conducted our own traffic monitoring at the same two locations, and at the times covered in their report, i.e. 0800-0900 Monday, 1700-1800 midweek and 1200-1300 Saturday. We added an extra mid-afternoon session at Pacific Drive to monitor pedestrians, which is discussed below.

2.4 The traffic monitoring was conducted between 14 and 19 November 2022 and full results are provided in Appendix I. Our traffic survey monitored only the number of vehicles, pedestrians and cyclists actually passing the entrance to the proposed Aldi site. There is considerably more traffic entering North Harbour at the Martello and Harbour Quay roundabouts, which service three Harbour Quay residential developments, the Waterfront outlets, Sovereign Harbour Yacht Club, Pacific House and the Harbour Medical Centre. These much higher traffic volumes are referenced in Connect’s report.

2.5 Our study was carried out by members of the SHRA manually counting traffic movements at the two locations simultaneously. A summary of the results is:

Time	Pacific Drive		Aldi Hampden Park		Total % increase in traffic movements
	Eastbound	Westbound	Entering	Exiting	
0800-0900 Monday	168	306	77	51	27.0%
1700-1800 Midweek	305	178	108	103	43.7%
1200-1300 Saturday	241	245	174	176	72.0%

3. PEDESTRIAN VOLUME MONITORING

3.1 One of the issues arising from the public consultation event concerned pedestrian safety, particularly of schoolchildren and families crossing Pacific Drive safely. Apart from saying we have a good pedestrian road network, and a single sentence reference to pedestrians in the Road Safety Audit, Aldi’s Transport Assessment fails to consider either the volume of pedestrians or their safety.

3.4 We monitored pedestrians and cyclists as part of our traffic monitoring on Pacific Drive and a summary of the results is:

Time	Adults	Children	Cyclists	Mobility Scooters
0800-0900 Monday	25	17	8	0
1500-1600 Monday	28	19	8	2
1700-1800 Midweek	32	1	5	0
1200-1300 Saturday	55	10	1	0

4. TRAFFIC FLOW

4.1 Aldi's store at Hampden Park is on Lottbridge Drove, a major road that was specifically widened and upgraded to accommodate the anticipated increase in traffic into Aldi. With existing residential properties and the medical centre, widening Pacific Drive at the approach to Aldi is not an option.

4.2 The approach route to the Hampden Park store is along a two-lane carriageway bordered by a central reservation, installed specifically to prevent Aldi traffic entering or exiting across oncoming traffic. Again, this is not an option for Pacific Drive.

4.3 At Hampden Park there is a 130 metre long no-parking access road into the store so, if the car park is congested at peak times, cars can queue on the access road, although traffic on Lottbridge Drove can also overtake safely in the outside lane.

4.4 Crucially, the Hampden Park store has two exits: a left-turn only onto Lottbridge Drove and a second route through an industrial estate that leads to the large roundabout at the Hampden Park retail estate. At no time do vehicles either entering or exiting Aldi need to cross oncoming traffic, and they are in fact specifically prevented from doing so.

4.5 Compare this with Pacific Drive: Our traffic monitoring study indicates that, based on customer flows at Aldi Hampden Park, at peak times there would be an average of one vehicle movement every 9.7 seconds.

4.6 Traffic entering Aldi eastwards, i.e. from Pevensey Bay Road or Harbour Quay, would turn left into the store, an easy manoeuvre in light traffic conditions. However, there is no long access route into the site. In fact, Aldi's proposed site layout has twenty parking bays either side of the access road, starting just a few metres from the entrance. We estimate there are no more than three or four car lengths between Pacific Drive and the first parking bays, including across the pedestrian footpath.

4.7 When cars are reversing out of these parking bays, or when the car park is busy and congested, vehicles entering Aldi will have nowhere to wait. They will need to queue on Pacific Drive, possibly across the entrance to the medical centre just 45 metres away.

4.8 Through traffic coming into North Harbour will try to bypass the queue, along the single carriageway, so drivers will pull out onto the westbound side, potentially into oncoming traffic. Anyone visiting the medical centre will need to join the queue, whilst drivers exiting the medical centre will have much reduced visibility, if indeed their access is not blocked by queuing cars.

4.9 Traffic entering the Aldi store westwards along Pacific Drive will be turning right across oncoming eastbound traffic. If drivers cannot turn immediately, they will stop and block westbound through traffic.

4.10 The situation worsens when looking at vehicles exiting from Aldi. As referenced in Aldi's Transport Assessment, a small proportion of vehicles would be driving eastward into North Harbour and would turn left, again a straightforward manoeuvre except at busy times when visibility will be much reduced by queuing cars and potentially through traffic trying to bypass the queue.

4.11 The majority of vehicles will head westward towards Pevensey Bay Road. From Aldi, they will turn right across incoming eastbound traffic, and into westbound traffic, some of which may be waiting to turn right into Aldi thus blocking their access. Again, their visibility may be impaired by queuing vehicles and bypassing through traffic.

4.12 If customers experience delays trying to turn right into Pacific Drive, they may choose to turn left. If they do, they face either a 0.4 mile detour to the Tambora Square roundabout, adding to traffic volumes along that section of Pacific Drive, or they may choose to shorten the detour by attempting U-turns at the entrances to Barrier Reef Way and Tasmania Way, home to hundreds of residents, with further potential for collisions.

4.13 Aldi's Transport Assessment shows the anticipated delays to traffic entering and exiting the proposed Aldi site. At peak periods, this amounts to 6.21 and 6.78 seconds incoming and 12.53 seconds. (5.4.3, table 5.1). With vehicle movements at peak times averaging one every 9.7 seconds, these delays are already significant.

4.14 The delays shown in the Transport Assessment are modelled on traffic flows at Aldi's Hampden Park store. As we know, at Hampden Park, customers benefit from the long access road unimpeded by parking bays, a choice of two exits, and no vehicles crossing oncoming traffic. The proposed Aldi is a single-access site with twenty customer parking bays starting within a few metres of Pacific Drive, and vehicles having to cross oncoming traffic. It would only require one or two customers attempting to reverse out of these parking bays to hold up the incoming traffic. The delays would be much greater than stated in the report, leading to inevitable queuing on Pacific Drive.

4.15 We have not added in the additional traffic accessing the proposed care home and residential home developments which, whilst smaller in number, would still constitute a significant increase in traffic movements along Pacific Drive. These are referenced in Aldi's Transport Assessment, although their report looks only at employees and residents, and does not appear to consider movement of the teams of care workers, health visitors or other support personnel, many of whom visit at peak morning and evening commuting times.

4.16 The proposed Aldi site layout also presents hazards for pedestrians. Aldi's Transport Assessment suggests a number of customers will travel on foot, and a significant proportion of these might be expected to come from North Harbour. The pedestrian refuge crossing is to the east of the main vehicle entrance but the proposed pedestrian footpath from Pacific Drive into the Aldi store is to the west of the entrance. Most North Harbour residents will therefore need to cross the main vehicle entrance in front of approaching and departing vehicles, including HGVs.

4.17 The NPPF specifically stresses the importance of social objectives and, in their Planning Statement, Aldi define the foodstore as having social benefit to the community, aligned with churches, schools, public houses and community centres. We believe the serious risk of traffic congestion and traffic incidents far outweigh these benefits as they potentially exclude residents from their homes, isolate them from family and friends, and restrict access for key social, emergency and medical services.

4.18 Paragraph 92 of the NPPF specifically notes: *'Planning policies and decision should aim to achieve healthy, inclusive and safe places.'* Paragraph 130 of the NPPF requires developments to *'add to the overall quality of the area and create safe and accessible environments.'* In their Planning Statement, Aldi claim: *'The application site is in an accessible location.'* In their Transport Assessment, Aldi claim: *'The proposed development is well conceived in terms of its access arrangements, composition and layout.'* [6.1.1] We cannot agree.

5. HGV DELIVERY VEHICLES

5.1 We have serious concerns regarding the movement of large articulated HGV delivery vehicles. At Aldi Hampden Park, HGVs enter the site from the dual carriageway and follow the access road unimpeded for 72 metres, leading directly to the loading bay. The vehicles can leave site along the long access road or via an adjacent exit through the industrial estate. At no time do HGVs manoeuvre in the main customer car park, although they do drive across a row of disabled parking bays before reversing into the delivery bay.

5.2 Compare this with Pacific Drive: Aldi's Transport Assessment indicates three articulated HGVs and one MGW daily plus two waste removal vehicles weekly, which amounts to an average 8.5 delivery vehicle movements per day. The HGVs are each up to 16.5metres (over 54 feet) in length.

5.3 To reach the loading bay, delivery vehicles must drive between the row of twenty customer parking bays on either side of the car park access route, then make a reverse manoeuvre in front of the eight parent-&-child parking bays into the loading bay. They then return through the avenue of parked cars before trying to turn right on Pacific Drive, across oncoming traffic in both directions. All this at the same time and in the same area that customers, some with small children, are making their own parking manoeuvres. Just imagine a 16.5 metre long articulated HGV being driven into the customer car park at Asda or Tesco, driving between rows of shoppers' cars and reversing in the family parking zone. It defies belief.

5.4 During opening hours, there is space for only one HGV vehicle on site at a time. Whilst Aldi state they would endeavour to manage their deliveries, if a lorry is delayed in traffic, or by congestion in the car parking area, or unloading, there is nowhere for other delivery vehicles on site. Nor are there any designated parking areas for large articulated HGVs at Sovereign Harbour North.

5.5 Incidentally, during the 1700-1800 midweek monitoring session at Hampden Park, traffic flow was fairly busy with vehicles arriving or leaving on average every 16.7 seconds. A 16.5m HGV was parked in the delivery bay. At 1730 a second equally large articulated HGV arrived and parked on the access route to the customer car park, obstructing the approach side of the access road and blocking off the vacant disabled parking bays. There was a difficult moment when a disabled customer tried to leave one of the two remaining bays, reversing blindly at the rear of the lorry into oncoming traffic in both directions, and in the darkness of night. Both HGVs were still there at 1800 when we left. (Photographs in Appendix II.)

5.6 The Transport Assessment states: *'Aldi operates its own fleet of dedicated vehicles and drivers. Aldi HGVs are driven and operated by the dedicated Aldi driver.'* [3.4.6], which suggests Aldi retain control over their deliveries. The HGVs seen at Hampden Park were branded Dave Bennett Distribution, an independent Kent haulage firm and private limited company.

5.7 Aldi's Transport Assessment also refers to the use of suitably trained safety marshals to assist customers when HGVs are manoeuvring on site. (3.4.10) At Hampden Park there was no evidence of any such support, even when the second HGV reversed in front of disabled parking bays and created a dangerous hazard for a disabled driver trying to reverse at the back of the lorry.

5.8 Informal conversations with HGV drivers at Aldi Hampden Park reveal that safety marshals are rarely or never deployed to help with HGVs on site. Whilst this is anecdotal, we question when and where Aldi's stated policy is actually enacted in practice.

5.9 In their Transport Assessment, Aldi claim that only one HGV will arrive at a time, that they use their own fleet and drivers, and that safety marshals are deployed to help customers. We know that none of these claims are reliable.

5.10 We question the ability of HGVs to manoeuvre quickly and efficiently on the proposed Aldi site. Aldi's Noise Impact Assessment (Table 7) refers to an arrival duration of HGVs *'in the service yard'* of 2 minutes and a departure duration of 0.5 minutes. There is no *'service yard'* at the proposed Aldi, only a customer car park and a single delivery bay. The arrival and departure timings assume unimpeded access between the customer parking bays, and free movement in front of the parent-and-child parking bays.

5.11 It is not clear if Sharps Redmore's data are modelled specifically for the proposed Aldi site or are based on traffic flows at Aldi's Hampden Park store, which has significantly different and better access arrangements for delivery service vehicles. Either way, we believe the timings are unrealistic.

5.12 Aldi's Transport Assessment states: *'The service route through the car park is satisfactory.'* [3.4.12] We do not agree. The Transport Assessment fails to take account of the inevitable delays to delivery operations - especially on arrival and unable to enter - with traffic backing up on Pacific Drive.

5.13 The timing of HGV deliveries is cause for concern. In their Planning Statement, Aldi say they can mitigate HGV congestion by scheduling deliveries outside of store opening, which means HGVs arriving and departing at anti-social hours, as early as 0600 and potentially as late as midnight (based on arrival by 2300 plus unloading time). (4.48)

5.14 Aldi's standard opening hours are 0800-2200 Monday-Saturday (1000-1600 Sunday). The Transport Assessment indicates four HGV/MGV deliveries per day plus waste removal vehicles twice weekly. (3.4.8) Unloading takes up to 60 minutes per vehicle (3.4.1), although at Hampden Park an HGV was parked in the delivery bay for longer than one hour. It therefore seems impossible to fit four or five deliveries into a three hour window of outside-opening hours without extremely tight scheduling, if at all.

5.15 The noise created by HGV deliveries is also cause for concern. In their Noise Impact Assessment, Aldi state *'Noise levels of the different components of service activity have been measured at similar stores.'* (4.12) We question which stores, and whether any are located on relatively narrow single carriageways, in residential estates, with homes in such close proximity.

5.16 Early morning deliveries, particularly of fresh produce, will include refrigerated HGVs that make considerably more noise. Aldi's recommended noise mitigating measures include: *'No movement of goods pallets or roll cages on open areas; no audible reversing beepers to be used outside trading hours; vehicle engines are turned off when the vehicle is in the loading bay; refrigeration units are switched off when the vehicle is in the loading bay.'* (4.21). It is not however possible to turn off engines when the HGV is on the Harbour Quay roundabout or approaching the site along Pacific Drive, both areas with overlooking residential properties in close proximity to the road.

5.17 If the three proposed developments were to go ahead, the care home will be in even closer proximity, indeed directly adjacent to the loading bay. Aldi's Noise Impact Assessment clearly identifies this as a problem, suggesting the care home might use special *'acoustic glazing and alternative means of ventilation/cooling to rooms closest to the delivery bay.'* (4.20).

5.18 Aldi admit *'Of main consideration to the existing residential properties and the proposed care home is potential noise from delivery activity during the early morning period.'* Aldi then state: *'During this period people are inside their properties'*. (4.17) We find Aldi's response to the very real problem of anti-social noise pollution somewhat dismissive.

5.19 If frequent unloading is taking place between 0600-0800 and 2200-2300, or even midnight, goods, particularly perishables, may need to be unpacked and taken to the shelves. This means the store will be illuminated through the night. This would be a wholly inappropriate and unacceptable intrusion of light in a residential area, with perpetual and severely adverse effects on the existing houses and proposed care home that overlook the Aldi site.

5.20 Aldi's Lighting Assessment, prepared by TamLite, provides no information about the social or environmental impact of lighting at the store and its surrounding site. It does however indicate a high level of illuminance, over 200,000 lumens, particularly in the car park and delivery bay areas. By comparison, stadium lights used to illuminate sports grounds and football fields are typically 60,000-150,000 lumens.

5.21 Early morning and late night movements of HGV vehicles to the proposed site would also causing lighting disturbance for local residents. The headlights of these vehicles entering Pacific Drive would sweep the windows of houses directly overlooking the Harbour Quay roundabout and the proposed care home, as would the headlights of exiting vehicles affect homes directly overlooking the site.

5.22 We are not looking at the occasional HGV delivery. Aldi's Transport Assessment indicates at least eight and sometimes ten HGV movements per day, every day including Sundays. The NPPF stresses the importance of environmental considerations. In their Planning Statement Aldi describe their plans for building design and tree planting, but no amount of landscaping can mitigate the negative environmental impacts of noise and light pollution that this will have on local residents' quality of life.

5.23 In their Planning Statement, Aldi state: *'the proposed store can be developed as outlined within this statement without causing significant impact or disturbance as advised by the NPPF.'* (4.53). We do not agree. In their Noise Impact Assessment, Aldi contradict themselves and admit that: *'Deliveries during the early morning period of 0600-0700 will have a potential adverse impact on existing properties.'* (4.15) With this we do agree.

IMPACT OF POTENTIAL TRAFFIC CONGESTION AND COLLISIONS ON PACIFIC DRIVE

6.1 A Road Safety Audit, undertaken by J. Bartlett Consulting, reports that there have been only five light and one serious collision on this section of Pacific Drive in the past five years. We are happy to agree that, as a residential road serving over 5,000 residents, our safety traffic record is good.

6.2 In the Transport Assessment, Connect Consultants state: *'A stage 1 Road Safety Audit undertaken by J. Bartlett Consultancy did not identify any areas of concern with regard to highway road safety within its scope.'* [3.3.1] We cannot agree. We are deeply concerned that the risk of collision is real and serious.

6.3 As already stated, there is only one way in or out of the harbour, along Pacific Drive, for 2,052 households. If there is a serious collision outside Aldi, some 5,000 residents will be denied access either into or out of their homes.

6.4 Crucially, emergency vehicles will have great difficulty getting through. An accident blocking this section of Pacific Drive will cause traffic to back up to the Pevensey Bay Road.

6.5 Furthermore, the RNLI station is located by the lock gates at the far end of Pacific Drive. On an emergency call out, the RNLI crew need to drive the length of Pacific Drive as quickly as possible. If the approach is blocked, they have two alternative options: Drive to South Harbour via Pevensey Bay Road, Princes Way, Ramsey Way, Prince William Way, Atlantic Drive, Santa Cruz Drive and Key West then across the lock gates on foot, a detour of 2.7 miles with a journey time of 9-15 minutes subject to traffic conditions, and assuming no consequential build-up of traffic on Pevensey Bay Road. The second alternative is to reach the RNLI station on foot through the harbour, a distance of 0.8 miles which, at a brisk pace, would take about 14 minutes.

6.6 We reiterate paragraph 111 of the NPPF that states: *'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'*

7. LIKELIHOOD OF TRAFFIC CONGESTION AND COLLISIONS NEAR ALDI

7.1 A Google search of press reports on traffic incidents near Aldi stores makes for unpleasant reading:

7.2 Congestion:

- Basildon Echo – *"A road widening scheme should be revisited to ease severe congestions on a key route which has seen huge queues for a new Aldi store", a councillor says.* This is not an option for Pacific Drive.

- Brighton Argus - *'New Brighton Aldi causes traffic chaos: A massive influx of shoppers to the newly-opened budget supermarket has led to a state of gridlock at the Saunders Park roundabout outside the store's only road entrance. A witness who asked not to be named described the scene as she saw it on Friday, saying: "There's long queues to go in, there's long queues to get out. It's traffic chaos; the residents in the road opposite are being trapped by all the traffic".'*
- High Wycombe Free Press: *'High Wycombe has created a monster: Tempers boil over as traffic jams near new Aldi get worse.'*

7.3 Collisions:

- Salisbury Journal – *'Warnings ignored, at least eleven crashes and shunts have happened outside Aldi in London Road since it opened four weeks ago. Colin Froude, chairman of SCC's planning and transport committee, described it as "a continuing nightmare".'*
- Devon Live – Paignton – *'Two vehicle crash at 15:40, police spokesman stated "Road is blocked. Recovery is being arranged", heavy delay. Traffic easing two and a half hours later at 18:10.'*
- York Press – Accident cleared, traffic delays, *'drivers are being asked to take alternative routes'*. (This is not an option for Pacific Drive).
- Lancs Live – *'Police, paramedics and firefighters were called. The road was completely closed to allow emergency services access to the scene. Motorists were advised to avoid the area for more than an hour and use alternative routes.'*
- Evesham Journal – *'The air ambulance was in attendance and the road remains closed as drivers are urged to find alternative routes. Road expected to be closed for several hours.'*
- Bournemouth Echo – *'The road was blocked from 5:26pm until 7:25pm (2 hours to clear). There were traffic issues in the area while police and ambulance responded to the incident.'*
- Nottingham Post – *'Specialist officers have been working through the night at the scene to investigate what happened'*. (We assume this meant the road was closed).
- Shropshire Star – *'A female pedestrian was treated by paramedics after being hit by a car next to Aldi.'*

7.4 These incidents share a common outcome: When traffic accidents occur, sometimes blocking the road waiting for recovery vehicles, sometimes closed for emergency vehicle access to the injured, or while specialist officers investigate the scene, drivers are told to avoid that area and find alternative routes. There are no other routes for North Harbour residents, emergency services, the RNLI and public transport.

7.5 The Transport Assessment states: *'No pattern of collisions has been identified which is likely to be materially worsened by the development proposals.'* [6.1.1] Again, we cannot agree.

8. CONCLUSIONS

8.1 The conclusion to Aldi's Transport Assessment states: *'The results of this assessment highlight that the proposed development is acceptable from a transport perspective.'* [6.2.1] We do not agree.

8.2 We believe that, where traffic data is based on Aldi's store at Hampden Park, the substantive differences in site layouts has not been given due consideration. The proposed layout of the Harbour development, the close proximity of customer parking bays to Pacific Drive, and the limitations for HGVs in the customer car parking area will create serious and potentially dangerous congestion. The consequential backing-up effect will exceed the capacity of both Harbour and Martello roundabouts.

8.3 This is not a Doomsday scenario. We believe that, due to the site layout of Aldi's proposed development, queuing traffic and consequent congestion on Pacific Drive will be a regular, frequent and probably everyday occurrence.

8.4 We cannot accept Aldi's claims regarding their control over HGV deliveries. Empirical evidence witnessed at Hampden Park show these claims are at best unreliable.

8.5 The NPPF specifies the importance of social, economic and environmental objectives, and requires that *'development should be refused where adverse impacts of [approving development] would significantly and demonstrably outweigh the benefits.'* The traffic issues, noise and lighting impacts outlined in this report substantially outweigh the social and environmental benefits.

8.6 The proposed Aldi development does not benefit our large community. The risk of serious traffic accidents is significant, and the implications for the safety of residents is severe. It puts all North Harbour residents at risk of not having 24/7 access to fire emergency services, paramedics, carers, social work support for vulnerable adults and children, safe passage for children cycling/walking to school, parents collecting young children from school, and adults (including key workers) getting to their place of employment. The implications for the safety of anyone requiring emergency help from the RNLI are also significant.

8.7 Crucially, paragraph 111 of the NPPF is clear that *'development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.'* The issues outlined in this report clearly demonstrate the severity of risks and the unacceptable impact on safety.

THE CONCLUSION OF THE SOVEREIGN HARBOUR RESIDENTS ASSOCIATION IS THAT THE PROPOSED ALDI FOODSTORE WITH ACCESS ONTO PACIFIC DRIVE MUST BE REJECTED.

APPENDIX 1: TRAFFIC SURVEY DATA

0800-0900 MONDAY

Time	PACIFIC DRIVE					HAMPDEN PARK		
	Vehicles East	Vehicles West	Pedestrians		Cyclists	Mobility Scooters	Vehicles In	Vehicles Out
			Adults	Children				
0800-0815	43	79	6	10	3		12	3
0815-0830	40	80	3	6	-		14	8
0830-0845	46	78	7	-	2		28	20
0845-0900	39	65	9	1	3		23	20
TOTAL	168	306	25	17	8	0	77	51

1500-1600 MONDAY – PEDESTRIAN ONLY SURVEY, PACIFIC DRIVE

Time	Pedestrians		Cyclists	Mobility Scooters
	Adults	Children		
1500-1515	9	-	2	-
1515-1530	2	7	3	2
1530-1545	12	9	1	-
1545-1600	5	3	2	-
TOTAL	28	19	8	2

1700-1800 MIDWEEK

Time	PACIFIC DRIVE					HAMPDEN PARK		
	Vehicles East	Vehicles West	Pedestrians		Cyclists	Mobility Scooters	Vehicles In	Vehicles Out
			Adults	Children				
1700-1715	95	49	13	1	2	-	32	25
1715-1730	61	51	8	-	1	-	27	22
1730-1745	81	41	4	-	1	-	22	33
1745-1800	68	37	7	-	1	-	27	23
TOTAL	305	178	32	1	5	0	108	103

1200-1300 SATURDAY

Time	PACIFIC DRIVE					HAMPDEN PARK		
	Vehicles East	Vehicles West	Pedestrians		Cyclists	Mobility Scooters	Vehicles In	Vehicles Out
			Adults	Children				
1200-1215	71	62	16	2	1	-	45	52
1215-1230	50	81	12	2	-	-	34	43
1230-1245	47	56	12	5	-	-	50	33
1245-1300	73	46	15	1	-	-	45	48
TOTAL	241	245	55	10	1	0	174	176

APPENDIX II – HGVs

Hampden Park 1730 17 November 2022

