

Mill Hill Preservation Society founded 1949



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Carl Griffiths Planning Office

London Borough of Barnet
Planning and Building Control
2 Bristol Avenue, Colindale
London NW9 4EW

25th February 2021

Your reference: 20/5933/FUL Our Reference MHPS/JL/EF/planning group/20.5933.FUL
Sent only by email to Carl Griffiths (carl.griffiths@barnet.gov.uk)

Dear Carl Griffiths,

TOWN AND COUNTRY PLANNING ACT 1990

SITE: Pentavia Retail Park Watford Way London NW7 2ET

PROPOSAL: Erection of a storage and distribution warehouse (Use Class B8) with ancillary offices, associated vehicle parking, van storage, pedestrian and vehicular access, landscaping and associated infrastructure works

REFERENCE: 20/5933/FUL

The Planning Group of the Mill Hill Preservation Society (MHPS) has studied this application on the Local Planning Authority (LPA) planning portal and has exchanged information with the Applicant's public relations consultant Cascade Communications Ltd. Normally the Society would have met the development team to discuss the proposal, but due to the COVID-19 restrictions this has not been possible in this instance. Special attention was paid to the details included in the application under the transport section and the additional information received in answer to questions raised by the Society is included at Appendix 1.

1.0 CONTEXT

1.1 The Society is pleased that this application responds to the general business/retail use for the site being a storage and distribution facility with ancillary offices in a relatively low building that will add employment opportunities to the locality. The last planning approval listed on the LBB planning portal as 15/01825/FUL "*Demolition of the existing Class A3 unit (Restaurant) and partial demolition, recladding and extension of the existing Class A1 units (Retail) and creation of Class A3 (Restaurant & Cafe) floorspace, Class D2 (Gym) floorspace, reconfiguration of vehicular access, staff parking and customer parking. Associated hard and soft landscaping to public spaces and new ramped pedestrian access (SCHEME 2)*" - was granted in August 2016. This approved scheme had parking for 359 car spaces and 29 staff vehicles bringing the provision to 388 spaces. There was a dedicated service yard and HGV service arrangements for all units.

1.2 The main challenges that we explore with this new proposal are visual impact, sustainability (i.e. carbon, energy use, water management and biodiversity) and traffic and transport. We have examined the general site layout and would not wish to dispute this, as it has been designed for the specific end user.

1.3 Distant views may not be an issue although the existing retail buildings are approx. 9.1 metres high and the new proposed will be 14.55 metres high. However, views from the two local Conservation Areas could be compromised. Views from Mill Hill Park Extension and adjacent residential areas are unlikely to be dominated by the proposal. However, to ensure this is the case it would be appropriate for the developer to include these views in the application.

1.4 The development will not put a strain on local social services being of a non-residential nature but will put a greater demand on highways than envisaged by the 2016 approved retail proposal.

2.0 LOCAL ISSUES

2.1. Site floodlighting in respect of day/night use may be an issue for the local UCL Observatory and the Society have put the respective parties in touch. The Applicant is aware of this issue as this is mentioned in a general way in Clause 5.18 of the Planning Statement.

2.2. Air quality in relation to local residences and the adjacent children's nursery is of concern with the increased traffic in the vicinity. The Applicant has allowed for 20% of car parking spaces to be provided with electric car charging points. Clause 7.40 of the Planning Statement states... *"The deck includes 358 storage spaces with 20% electric charging provision with the remaining van storage spaces fitted with passive EV provision in order that they can be activated to meet the increasing requirements of the occupier."*

Whilst this will help the aims of the Local Authority Air Quality Management schemes, as the site has been dormant for a few years there is likely to be a significant increase in vehicle pollution and this pollution will need to be mitigated against particularly for adjacent residential properties and the children's nursery.

2.3 Noise Pollution is a consideration as there are residences nearby. Clause 7.70 of the Planning Statement states that cumulative operational noise levels during the daytime and night-time periods are predicted to be below the guideline noise intrusion criteria at nearby properties, assuming both a windows-open and a windows-closed scenario. Maximum noise level limits have been set for proposed building services plant that are predicted to result in a noise rating level which is at least 5 dB below the existing background noise level during both the daytime and night-time periods. However, in the event of working 24 hours per day, 7 days per week, there is likely to be some night-time disturbance to nearby residences throughout the year and particularly in summer months.

2.4 The concept of 24/7 working is not discussed in the Application although it is clear from the additional information provided that HGV deliveries will be undertaken overnight (from 22.00 to 10.00). Elsewhere it is stated van deliveries will be leaving between 06.30 – 10.00 in the morning returning between 16.00 – 19.00 in the early evening. The hours of operation, HGVs and vehicle numbers need be conditioned in the event of an approval.

We note that some of the information provided to us differs from that within the supporting documentation, for example clause 4.7 advises that vans leave between 07:00 – 12:00 and return between 16:00 – 21:00. This causes some concerns about what else may be different.

2.5 An aspect raised by some of our members, not in the Application, is delivery by drone. The Amazon drone services is called Amazon Prime Air and there have been trials in the USA. We know the Applicant also ran an apparently successful UK trial in December 2016, in Cambridge, where a package was delivered by drone in 13 minutes. MHPS feels this would be an inappropriate location for the provision of such a service and wish that in the event of an approval it is conditioned that the use of drones, in any form, will not be allowed and their future use be subject to a further planning application.

2.6 Another service that should not be added to the scheme without a further planning application would be that of 'Click and Collect'. This is becoming more popular and would certainly add another unacceptable level of traffic generation to the site.

3.0 LAYOUT

3.1 We have examined the proposed site layout and understand the reasons for the general configuration as stated above (clause 1.2).

3.2 The nature of the scheme dictates that there are large areas of hard surfacing, and as such surface water management is a challenge. The attenuation pond in the north-west corner of the site looks modest and due its location in the woodland area the pond should be designed to achieve a net-gain in biodiversity as required by national policy. Other environmental issues are covered in section 4.0 Landscaping.

3.3 When looking at the scheme layout we considered whether there could be other vehicular links to the site. Only two suggestions came up to improve egress from the site and these were a dedicated slip road onto the M1 from the west side of the site, and/or an underpass link road to the A1. It does not state in the Application if these options have been considered.

4.0 LANDSCAPING

4.1 The Society notes that, in spite of the extensive size of the site, part of the woodland area in the north of the site, and the area adjacent the attenuation pond, have been given over to roads and hardstanding. This is an unacceptable loss of wooded green space. The Arboricultural Assessment drawing 9552-T-02 A shows the hedgerows and the few trees that exist on the site are shown as removed. This further loss of greenery makes it essential that the perimeters of the site do provide adequate planting and screening. On the eastern boundary adjacent to the A1, MHPS considers the boundary treatment screening of the development inadequate.

4.2 The retained boundary fence alongside the M1 and proposed the 2.5 metre Paladin Fence to the northern boundary seem reasonable. Inside this fence, but again on the north side there is shown an additional 2.4 metre Paladin Fence. This runs along to meet the A1 boundary fence that is retained and repaired where necessary. Further along the A1 to the south there is proposed either a 2.4 or a 3.0 metre Paladin fence. These fences are not considered sympathetic at the pavement edge. An improvement to the scheme would be for

the fence to be set back from the pavement edge and to have planting both in front and behind it, thereby softening the appearance of the fence, but retaining the security line.

4.3 Internally on the site there is proposed a 3-metre acoustic timber fence on each side of the service yard, this seems reasonable.

4.4 Target biodiversity net gain and urban greening factors are stated to be in line with the London Plan 'Be Lean, Be Clean, Be Green'. We could not find an UGF calculation in the submission and we would be pleasantly surprised if it meets GLA targets. The northern woodland strip along Bunns Lane could be improved with greater biodiversity gains and enhanced management. MHPS consider the four starling nesting boxes and two four-hole fronted bird boxes are not sufficient contribution to the policy aims and appear a rather tokenistic contribution to biodiversity. We fear the fencing proposed to the northern edge will cut off animal access to the green areas. Provision should be made to resolve this.

4.5 The design should explore the use of green walls and scope for climbing planting in relation to the multi-story van-park, to soften the appearance when seen from the north, east and south. This would also help to mitigate additional pollution that the scheme will produce. As so much of the scheme is hardstanding, sections of green roof need to be considered to increase biodiversity. The Mayor has introduced an urban greening factor in the New London Plan to boost green infrastructure provision and this is appropriate here. Should on-site provision of green space infrastructure and net-gain to biodiversity be insufficient then additional offsite compensation should be explored within the locality.

5.0 SCALE and APPEARANCE

5.1 The visual impact of the buildings is likely to be greater than what has been on the site over the recent past, being approximately 14.58 metres high as opposed to the current 9.1 metres. This increase makes the building approximately two normal storeys higher. The top of the stair cores will be 15.77 metres, which will be a further increase.

5.2 The main warehouse building will be seen from the south, railway and the motorway. It is likely that views from the north will be partially screened by the woodland area, and the views to the east will be dominated by the multi-storey van park. The design of the main building is reasonable but we considered that a colour gradation to the elevations at fascia level would reduce the dominance of the building when viewed from wider locations..

5.3 Photo-Voltaic panels on the roof would make good sense and may be considered for renewables, especially with the switch to electric delivery. MHPS would strongly encourage the use of PV panels as currently being promoted by other Amazon distribution centres.

5.4 Being slightly elevated the view from the M1 will be significant, but the main elevation is considered from the south: Clause 5.5 of the Planning Statement states that this will be the main viewpoint for all northbound A1 motorists. It is therefore important to ensure that what can be seen of this elevation does not become an eyesore through its industrial nature.

5.5 One element that will be visible both from the south, the east and the north is the multi-storey van park. The Concept drawings on page 9 of the Design & Access Statement clearly shows a view of the scheme from the north, with the multi-story van park having solid fascia

panels that look reasonably attractive. These are also shown on architects drawing 20-6461 P18 with the stair towers White Grey RAL 9002 and the fascias to the van parking upstands in a brighter white colour. From Bunns Lane, the retained vegetation will contrast against the deck features and cladding surface to help the deck to blend into the background and the sketch shown looks acceptable.

5.6 However, as shown on drawing P17 - for the majority of the east elevation and the full extent of the southern elevation, the van park fascia details change and are proposed to be galvanised steel mesh panels. MHPS feels this design does not constitute high quality design and will appear discordant against the remainder of the built form. Furthermore, this will not mitigate against light from headlights or general movements.

5.7 Having obtained a degree of continuity for part of the scheme between the building and the van park, it is lost altogether for the remainder. In our opinion it may be acceptable to retain the mesh detail to the access ramps as a design feature, and internally where they are not prominent, but we feel a consistent treatment to all the visible parts of the van park would give the building design more unity. The way the scheme is currently drawn with the dark coloured galvanised steel in prominent positions is unsympathetic and too industrial. We feel this change is important.

5.8 The views given on the Concept drawing (referred to above) highlight this issue. The view shown from the north is quite attractive for a building of this type. However, the view from the south does not have the same design continuity and the van park details to the right of the stair tower are lost in a dark shadow.

6.0 TRANSPORT

6.1 Planning Statement Clause 7.18 references accepted trip generation for the existing uses on the site from application 17/8102/FUL using these in the analysis of two-way trips at morning and evening peaks. This 2017 application was undecided and so the information quoted was never approved. It thus represents an inaccurate base level for the assessment.

6.2 The Transport Assessment for the application was prepared by VECTOS dated 3/12/2020 and will be referred to in our letter as the TA. MHPS feels that the information related to transport contained in this application is insufficient to reach adequate decisions on the acceptability (or otherwise) of this aspect of the development. We have already noted in the introduction that an Appendix has been added to cover additional information provided by the Applicant. However, our comments here are limited accordingly and we feel the LPA should carefully consider the shortfalls in the information.

6.3 The base information provided is as follows:

- 132 Full Time Equivalent (FTE) staff confirmed as solely associated with B8 element
- 449 vans

6.4 Conflicting information:

- Number of staff (the TA references 147 of B8 use)
- Timing of van movements (referenced above)
- Length of delivery period

6.5 The additional information provided by the Applicant indicates that the number of staff is based on an average assessment from the Homes and Communities Agency Employment Density Guide. Therefore, there can be no confidence in the information provided. The end user of this building is well known and has other sites; the extent of employment required should therefore be known and not an estimate.

6.6 This is compounded by the discrepancies across the submission of the numbers stated, the application form references 132-FTE, and the TA references 147. Neither figure includes van drivers who are employed on site, albeit accepting that they are away from the site for the extent of their shift. It is critical that the full extent of employees is known and fully explained to enable adequate parking provision to be available and that any transport movements have regard to the correct levels of traffic.

6.7 Based on the additional information provided by the Applicant there could be 381 vans operating out of this site on any one day, the more likely number of staff on site is therefore 513FTE. Clause 4.5 of the TA states that *"local drivers would arrive at the site by various means of transport, collect a van and leave the site to make deliveries. Once all deliveries have been made, drivers would return the vans to the site, collect their own vehicles (if they have driven to the site), or travel home by other means of transport."*

6.8 Clause 4.18 of the TA states that, based on the appropriate Model Shift that 147 B8 staff will require 87 parking spaces, with an additional 58 to allow for a shift change over. Accordingly, the demand for the B8 element only would be 121 staff parking spaces, including disabled provision. Based on the likely correct staff levels, the staff parking requirement is nearer to 421 spaces.

6.9 The actual parking provided is 111 spaces and based on the Applicant's own figures alone will not meet the demand, especially when applying the correct staffing levels.

6.10 This will lead to overspill parking either in the Bunns Lane area or Grahame Park Way. This is unacceptable, as both areas are already congested.

6.11 Cycle parking is proposed at 20 long stay spaces and 10 short stay spaces based on the B8 standards only. This fails to have regard to the Class E (formerly B1) office space, or the need to provide for the percentage of drivers it is suggested will use other modes of transport than the private car. There is a concern that this provision is insufficient and will result in employees using the car due to a lack of cycle parking spaces. Appreciating that the number could be increased via the Travel Plan monitoring regime, it is essential that sufficient provision is made up front to establish positive trends from the outset. Moreover, it is questioned as to where additional cycle parking could be provided, as the site lacks any residual space.

6.12 The approved planning scheme 15/01825/FUL (see Clause 1.1) covered the servicing demands for the site with, on average, one to two HGV deliveries per day to each of the eight units. This standard would allow for between 9 and 18 HGV deliveries per day. On the proposed scheme the Applicant states that there will be around 24 HGV deliveries to the site between the hours of 22:00 and 10:00 – an average of 3 HGVs per hour (in fact an average of 2 HGVs per hour – what matters is the maximum in any one hour). This is relatively small

average increase on the previously approved scheme. If this is the case, then the HGVs will not overload Mill Hill Circus roundabout or the Fiveways Corner junction. However, there are eight HGV docking bays proposed, clearly if there are more than 3 HGVs, particularly during the peak AM period, then this needs to be accurately assessed. It should therefore be conditioned that no more than 3 HGVs per hour should be delivering to the site during 06:00 and 10:00, unless additional evidence is provided to demonstrate that there will be no detrimental impact on the function of the junction.

6.13 It should be noted that the additional information provided by the Applicant indicates that it will take each HGV an hour to unload and clear the docking bay. Whilst there should be sufficient capacity within the yard to accommodate vehicles, there is a concern that this may not be the case in peak periods such as Christmas. The application submission suggests a booking system is in place to ensure deliveries are appropriately spread throughout the delivery hours. The booking system should be secured by planning condition.

6.14 It is noted that HGVs will be turned away from the site if there is insufficient room within the yard to accommodate it. This will require the HGV to reverse back onto the roundabout to enable it to exit as there is no provision for HGV turning at the gate nor is there any hold-over area.

6.15 Vehicle access/egress to the site is taken from the northbound carriageway of the A1 (Watford Way) through a slip road leading to a roundabout. Drivers accessing the site travelling southbound are required to undertake a U-turn manoeuvre at Fiveways Corner, a signal-controlled intersection. Drivers wishing to travel south from the site are required to undertake a U-turn at Mill Hill Circus, a four-arm roundabout with partial signalisation. Some of the TA information is misleading, as it is based on a scheme that did not obtain planning permission for a retail/distribution site and the last one approved has now lapsed.

6.16 The nature of these movements around the roundabouts is challenging and tight, the size of the HGVs to be used is potentially longer than the tangent on one side of the existing Mill Hill roundabout. As such, when standing waiting to proceed round to go back along the A41 into London it may block the lanes of the traffic proceeding east to west along the A41. Tracking plans should be provided to demonstrate that the HGVs can manoeuvre without hindering the free flow of traffic.

6.17 The information provided in Appendix 1 states that delivery vans operate on a nine-hour shift and typically arrive/depart between 06:30 and 10:00 before returning between 16:00 and 19:00. There would be a maximum of 96 vans leaving each hour. Both of these figures do not correlate with the information within the application documentation. The TA advises that arrival and departure times are between 07:00 and 12:00 and 16:00 and 21:00, with 90 vans leaving in the AM peak and only 3 returning in the PM peak.

6.18 Setting aside the clear discrepancy in information provided, MHPS calculates the morning period is three and a half hours. Based on 85% of the vans being operational, up to 381 could leave in this period. We calculate that would be 109 vans per hour, a van every 33 seconds. This is significantly higher than the numbers within Table 6.2 within the TA.

6.19 Further confusion is added when you consider the 'at least' 6-hour delivery journey of the vans (Clause 4.7 of the TA). The figures provided to MHPS suggest vans are out for approximately 10 hours at a time, with the submitted TA times suggesting 9-hour journeys. It is important to understand what exactly is proposed, as it is clear that 381 vans returning to the site between 16:00 and 21:00 equates to approximately 76 vans per hour, however, Table 6.2 suggests only 9 vans return in the PM peak.

6.20 Additionally, Table 6.2 suggests there are an equal number of van arrivals and departures within both peak periods, Clause 4.26 advises that vans are stored on site overnight and therefore the figures in the table need explaining.

6.21 Appreciating that the key hours in transport assessments are AM and PM peak periods, this area is heavily trafficked throughout the day and particularly during the times this additional amount of traffic is proposed to access the network. In addition, there will be staff arrivals, and visitors and all this traffic has to leave the site and go up to Mill Hill Circus and on the way back come through Fiveways Corner in similar numbers. The additional information provided demonstrates that staff will be arriving up to 08:00 and leaving as early as 18:00, coincidentally. Just before and after the peak periods, however, this road network does not suddenly get busier at 08:01. The assessment should, given this specific location, consider times beyond just the two peak hours.

6.22 The TA has analysed the Mill Hill Circus roundabout but **not** Fiveways Corner. Results are noted in Clauses 7.5 and 7.6 and Tables 7.3 and 7.4 of the TA. The results of the observed scenario assessment indicated that the A1/Lawrence Street/The Broadway roundabout is currently operating over capacity with a PRC of -9.7 in the AM peak hour and a PRC of -10.4 in the PM peak hour. In the AM peak hour, the A1 (west) entry arm experiences a maximum queue length of 35.5 PCUs. As demonstrated in Table 7.4, the results of the observed plus proposed development scenario assessment indicates that the A1/Lawrence Street/The Broadway roundabout will continue to operate over capacity. Acknowledging that the roundabout does operate over capacity, simply cannot justify putting additional traffic onto it.

6.23 Given the highlighted concerns regarding the accuracy of the data provided, there are reservations regarding the assumed impact on these junctions.

6.24 The information we have been unable to gain access to is as follows:

- ✚ How many van drivers per day?
- ✚ Where do the van drivers park?
- ✚ They have only used B8 parking and not included B1 figures that would be higher person/m² ratio, or any allowance for van drivers
- ✚ Where is there scope for any uplift in cycle parking? - an amended plan needed
- ✚ Why provide extra cycle parking and not car parking especially when the provision of either is not sufficient?
- ✚ They have not adequately answered our questions about van return time in the TA
- ✚ The FTE should include van drivers as they impact on all other matters
- ✚ What happens at Christmas when deliveries increase to site by HGVs - should be restricted to no more than seven HGVs on site at any one time?

- ✚ 96 vans per hour leaving plus 15% residual = 381: if this is correct then it should be conditioned that no more than 96 vehicles leave the site in any hour
- ✚ Clear need for information relating to the nature of the operation, van scheduling, and shift patterns to be set out to ensure no adverse effect from the additional traffic movements on the surrounding locality
- ✚ Updated TA required to address correct staffing levels and movements

7.0 CONCLUSIONS

7.1 It is not unreasonable to state that we support a scheme that is going to bring employment to the locality, but at the same time it is not acceptable to support a scheme where the traffic outcomes may prove unacceptable. It is for this latter reason that we have requested more information from the developer in a meaningful process, not something flimsy that can be brushed aside later.

7.2 The application needs to provide a clear, unambiguous understanding of the proposal; the end user is known and they operate other similar sites such that there should be a clear knowledge of the intended staffing levels and operation, after all, the layout of the site has been devised around the intended operation - Amazon. This is not a speculative scheme for an unknown operator.

7.3 Without this level of understanding, it is not possible to ascertain the level of parking (car and cycle) required or properly quantify the level of impact on the adjacent road network. The omission of key information leads us to believe that the impact could be severe if the correct assumptions were entered.

7.4 On the basis of our concerns, we consider it to be appropriate for the development to make improvements to the two affected roundabouts. Improvements were proposed to Mill Hill Circus roundabout a little while ago but the GLA and TFL shelved them. Accordingly the work has already been undertaken to demonstrate how improvements to this roundabout could be delivered and would offset the likely severe impact on highway safety.

7.5 In the event the Council is minded to approve this scheme then MHPS believes the following conditions are required to make the development acceptable:

- a. Hours of operation and, deliveries by HGVs
- b. Number of HGVs on site at any one time and their management
- c. That no more than 96 vans per hour should leave the site
- d. Shift hours
- e. Improvements to Mill Hill Circus Roundabout
- f. That drones should not be used for deliveries without prior planning approval
- g. That 'Click and Collect' is not made available without prior planning approval
- h. Landscaping scheme to minimise visual impact and deliver a net-gain for biodiversity
- i. That the development harnesses the potential to generate renewable energy
- j. Offsite bio-diversity compensation within the locality

We trust the planning authority will take these matters into consideration when assessing this application. We further suggest the London Borough Barnet examine fully the Transport Assessment and make good the deficiencies MHPS has identified.

It is difficult to recommend this scheme for approval when the proposals will make the existing roundabouts more congested for the local residents without improvements along the lines we have suggested.

Yours sincerely

John Living

John Living AAdip CMdip RIBA

Honorary Architect on behalf of the Planning Group of the Mill Hill Preservation Society

In conjunction with Barker Parry - Planning Consultants

Appendix 1.

Vectos

Mill Hill Response to Mill Hill Preservation Society Queries

194663-44

February 2021

Introduction

1. In December 2020, a planning application (reference: 20/5933/FUL) was submitted to the London Borough of Barnet (LBB) for:

“Erection of a storage and distribution warehouse (Use Class B8) with ancillary offices, associated vehicle parking, van storage, pedestrian and vehicular access, landscaping and associated infrastructure works.”

2. In January 2021, comments were received from the Mill Hill Preservation Society regarding the proposals. This Technical Note has therefore been prepared to address these queries and comments raised, which are provided in bold, with Vectos’ response following.

Mill Hill Preservation Society Queries and Vectos’ Response

There is no indication as to the split of staff between vans and warehouse, the application form states 132 FTE, but there are 449 vans?

3. Details of estimated job creation were calculated using a formula widely used for planning applications set out within the Homes and Communities Agency Employment Density Guide (2015) which indicates that a ‘Final Mile’ Distribution Centre provides approximately 1 full time equivalent (FTE) job per 70 sqm of floorspace.

4. Based on the floorspace of the warehouse the scheme could provide in the region of approximately 132 FTE jobs which is referenced on the application form. In the context of this estimated figure, the circa 132 FTE jobs will be working within the warehouse/ancillary office. The drivers of the vans are not included within this figure.

There is no indication as to shift patterns, ... it is difficult to ascertain whether the transport information is correct.

5. The employees within the warehouse generally work between 05:00/08:00 and 18:00/19:00 to sort the parcels ready to be picked up by delivery vans. A smaller number work between 22:00/23:00 and 05:00/08:00 to unload the HGVs and start the sorting process. The shift changeovers will therefore occur outside the peak traffic hours i.e. outside 08:00-09:00 and 17:00-18:00.

Similarly, there is no indication as to the extent of vans out at any one time. There is an indication that there will be 90 van movements out of the site between 8-9am, so working on 449 vans, there will be 90 leaving the site every hour between 7-12am. Based on the suggested 6 hr delivery cycle, you should therefore see 90 vans coming back between 5-6 pm (namely vans leaving between 11-12 am) however, the transport statement suggests there will only 9 vans.

6. The delivery vans operate on a 9 hour shift and typically arrive/depart between 06:30-10:00 before returning between 16:00-19:00. There would be a maximum of 96 vans leaving each hour.

7. In addition, not all of the 449 vans are used every day as there is a residual needed for fleet management (i.e. planned/unplanned) maintenance. Typically, between 10-15% of the total number of vans are not used each day. The 449 van storage spaces allow for seasonal peaks, when vans would leave over a longer period.

The application is only proposing cycle parking based on the B8 element of the scheme, and continually fails to have regard to the additional 467sqm of Class E office space, this generates an additional 4 cycle spaces.

8. The office floorspace is ancillary to the B8 warehouse. As such, only the B8 cycle parking spaces have been applied. This approach is common and has been widely accepted on other warehouse schemes. Nevertheless, 4 additional cycle parking spaces will be included within the proposed site layout.

9. In addition, the proposals will be subject to a Travel Plan, which will regularly monitor the cycle parking demand. If the demand is approaching the cycle parking capacity, additional spaces will be provided in order to further encourage the use of cycling.

The proposal does not indicate the number of HGV visits per day. With 8 unloading bays this could be a considerable number: nor is there an indication of their planned arrival and departure times. How long does an HGV stay on the site?

10. It is predicted that there will be around 24 HGVs visiting the site per day between the hours of 22:00-10:00, this is an average of 3 HGVs an hour.

11. HGVs from larger fulfilment centres will deliver pallets of packages to the site overnight. These packages are then unloaded from the HGVs via the dock doors into the warehouse. Once unloaded, the HGV will depart the site immediately. Each HGV will be on the site for no more than an hour.

The scheme talks about a vendor booking system to manage the arrival of HGVs and minimise the need for freight to wait around the site, however, there is nowhere indicated on the plans for freight to wait unless they start obstructing the internal access road from the roundabout (wider road within the site is all controlled by barriers), this creates a possible risk of tailback on to the roundabout. This is further exacerbated as any vehicles that are late run the risk of being turned away (only reason to be turn away is if there is no capacity), there is no scope for them to manoeuvre within the yard to leave in a forward gear if the HGV docks are all in use so will need to reverse back to the roundabout!

12. Given the number of HGVs visiting the site, which as stated above is an average of 3 an hour, and as it takes an hour to unload a vehicle the maximum demand for HGV bays could be 6. Therefore, having 8 HGV bays allows for a 25% contingency. This ensures that in the event that some vehicles arrive either slightly early or late they can be accommodated within the servicing yard. The booking system for HGVs ensures that vehicles are not turning up significantly early/late.

END