

# The London Tunnels

Delivery and Servicing Plan

PROJECT NO. 70106185 REF NO. TP00004

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## The London Tunnels PLC

## THE LONDON TUNNELS

Delivery and Servicing Plan

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**WSP** 

WSP House 70 Chancery Lane London WC2A 1AF

Phone: +44 20 7314 5000

WSP.com



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Prepared by	Henry Harbron	Henry Harbron	Henry Harbron	Henry Harbron
Signature	Kuflhan	puffer	puffer	Kufldan
Checked by	Robbie Arnold	Robbie Arnold	Robbie Arnold	Robbie Arnold
Signature	Ramold	Ramado	Ramado	Ramado
Authorised by	Doug McDougall	Jessica Johnson	Jessica Johnson	Jessica Johnson
Signature	eman.	J. Janson.	J. Jan 200.	J. Janson.
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APPENDIX A

SERVICING VEHICLE SWEPT PATH



#### 1 INTRODUCTION

#### 1.1 OVERVIEW

- 1.1.1. This Delivery and Servicing Plan (DSP) has been prepared by WSP on behalf of The London Tunnels PLC (TLT the "Applicant") in relation to planning application (ref: 23/01322/FULMAJ) for the redevelopment of the Kingsway Tunnels and associated properties at 31-33 High Holborn (Fulwood Place) and 38-39 and 40-41 Furnival Street (the "Site") into a world-renowned tourist attraction (the "Proposed Development").
- 1.1.2. The Site lays across the border between City of London (hereafter referred to as CoL) and London Borough of Camden (hereafter referred to as LBC) as shown below.

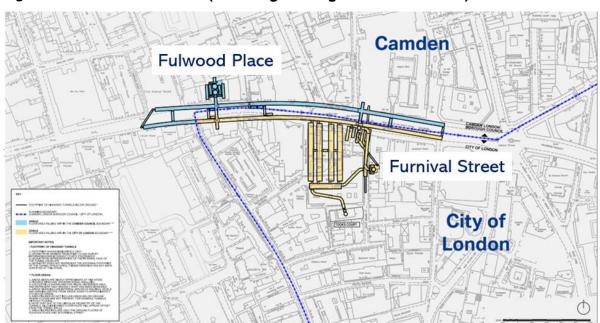


Figure 1-1 - Site Location Plan (including below ground level assets)

- 1.1.3. CoL and LBC act as the planning and highway authorities for the site location. On-going preapplication meetings and discussions have taken place with these authorities since October 2023, including with the highway authorities. Additionally, the proposals have been discussed with Transport for London (TfL), including with consideration to TfL's network and predicted trip generation.
- 1.1.4. Planning application (ref: 23/01322/FULMAJ) was submitted in December 2023. The former Kingsway Telephone Exchange Site was constructed as a deep-level shelter in the 1940s and was operational for several different land uses until 1996 when the Site was disused. The Proposed Development is to repurpose 7,869sqm of the existing tunnels into a tourist attraction offering a range of exhibitions and other uses such as gift shop and bar. The full development description is:

Change of use of existing deep level tunnels (Sui Generis) to visitor and cultural attraction, including bar (F1); demolition and reconstruction of existing building at 38-39 Furnival Street; redevelopment of 40-41 Furnival Street, for the principle visitor attraction pedestrian entrance at ground floor, with retail at first and second floor levels and ancillary offices at third and fourth levels and excavation of additional basement levels; creation of new, pedestrian entrance at 31-33 High Holborn, to provide

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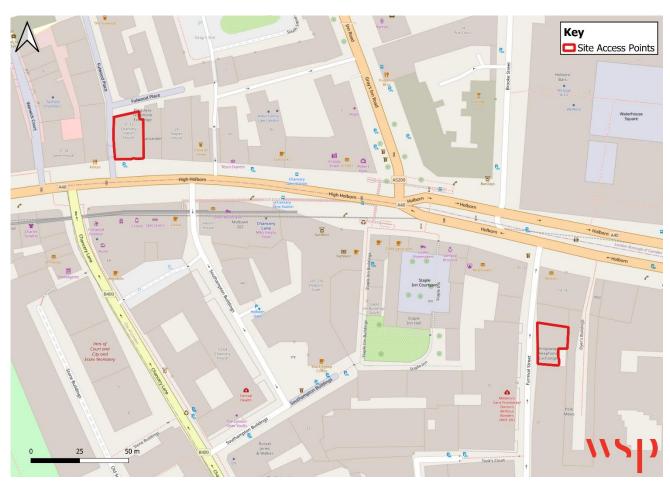
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- secondary visitor attraction entrance (including principal bar entrance); provision of ancillary cycle parking, substation, servicing and plant, and other associated works.
- 1.1.5. WSP prepared a DSP (November 2023) in support of the above planning application. An updated DSP (March 2024) was also submitted to CoL's Highway Authority. Further comments have been received from CoL and LBC which have been taken into consideration within this updated DSP (May 2024). A copy of CoL, LBC and TfL's consultation response is provided in Appendix A of the submitted Transport Assessment (TA) (May 2024).
- 1.1.6. This DSP should be read in conjunction with the TA. As shown in Figure 1-2 the Fulwood Place access is located within LBC and the Furnival Street access is located within CoL.

Figure 1-2 - Site Access



#### 1.2 REPORT PURPOSE

- 1.2.1. The purpose of this DSP is to inform CoL and LBC of the intent of the Applicant in managing service vehicle trips to and from the Proposed Development. The Plan's objective is to minimise the impact of these goods' vehicle trips on the surrounding public highway.
- 1.2.2. The remainder of this document is structured as follows:
  - Chapter 2 reviews relevant planning policy and guidance in relation to deliveries and servicing;

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- Chapter 3 presents the proposed servicing provision for the Site;
- Chapter 4 identifies the objectives of the DSP;
- Chapter 5 presents the measures and initiatives to be employed to increase servicing efficiency for the Site; and
- Chapter 6 presents the proposed methodology for monitoring and reviewing the DSP.
- 1.2.3. The delivery and servicing strategy for the Proposed Development, as described herein, has been devised in agreement with respective highway authorities.



#### 2 POLICY CONTEXT

#### 2.1 INTRODUCTION

2.1.1. This chapter sets out the relevant delivery and servicing policy context which is relevant to the Proposed Development.

#### 2.2 DELIVERY AND SERVICING POLICY

2.2.1. The national, regional, and local transport policies relevant to the Proposed Development are well documented and this section does not seek to replicate them. Instead, the key themes in the relevant national and local policies are summarised briefly in turn, and where relevant, policies which relate directly to the Proposed Development are addressed.

#### 2.3 NATIONAL POLICY

#### **NATIONAL PLANNING POLICY FRAMEWORK, 2023**

2.3.1. The National Planning Policy Framework (NPPF) promotes the use of sustainable transport throughout the UK, safe road design, and the efficient and sustainable delivery of goods and supplies.

#### **TRAFFIC MANAGEMENT ACT, 2004**

2.3.2. Part 2 of the Traffic Management Act sets out the responsibility of local authorities to manage traffic networks within their geographical area of responsibility. This includes efficient use of the network and the requirement to take measures to avoid contributing to traffic congestion. Part 5 outlines the responsibility of local authorities in Greater London to manage the strategic route network. This includes Transport for London's (TfL) role to manage certain areas of the Greater London route network.

#### 2.4 REGIONAL POLICY

#### **LONDON PLAN, 2021**

2.4.1. The London Plan sets out emerging policy for London and is a material consideration in planning decisions. The London Plan promotes sustainable freight promotion and encourages developers to consider all reasonable endeavours to utilise non-road vehicle modes in the delivery of goods and supplies to sites.

#### 2.4.2. Policy T7 of the London Plan states:

- "Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.
- Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing; and

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- At large developments facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans".
- 2.4.3. With further regard to Delivery and Servicing Plans it is stated in 10.7.5 of the London Plan that:

"Delivery and Servicing Plans should demonstrate how the requirements of the site are met, including addressing missed deliveries. Appropriate measures include large letter or parcel boxes and concierges accepting deliveries".

#### THE LONDON LOW EMISSIONS ZONE, 2008

- 2.4.4. The Low Emissions Zone (LEZ) is a scheme that aims to improve air quality in London by setting and enforcing new emissions standards for HGV's, large vans, and minibuses, and deterring the use of the most polluting vehicles by freight operators. The London LEZ is a first for the UK and is one of the largest schemes of its type in the world. Cars and motorcycles are not affected.
- 2.4.5. The LEZ operates 24 hours a day, 7 days a week. A daily charge of £200 is applicable to lorries, buses and coaches, and a £100 charge applies to heavy vans and minibuses that do not meet the required standards.
- 2.4.6. The LEZ is enforced through fixed and mobile cameras, which read vehicle registration number plates within the LEZ and check them against a database of vehicles that meet the LEZ emissions standards or are either exempt or registered for a 100% discount or have paid the LEZ daily charge.

#### THE LONDON ULTRA LOW EMISSIONS ZONE (2019)

- 2.4.7. To help improve air quality, an Ultra-Low Emission Zone, (ULEZ) has been in place in central London from 8 April 2019 in the same area as the Congestion Charge. Most vehicles including cars and vans will need to meet new, tighter exhaust emission standards, (ULEZ standards) or be liable for a daily charge to drive within the ULEZ area.
- 2.4.8. Similar to the LEZ, a daily charge runs from midnight to midnight. If you drive within the ULEZ area across two days, for example before midnight and after midnight, you will be liable to pay two daily charges if your vehicle doesn't meet the ULEZ standards. This will be in addition to the weekday Congestion Charge and the Low Emission Zone (LEZ) charge and will replace the T-Charge.
- 2.4.9. Since 29<sup>th</sup> August 2023 the ULEZ area has been expanded to cover the entirety of Greater London.

#### THE FREIGHT AND SERVICING ACTION PLAN, 2019

2.4.10. This Freight and Servicing Action Plan provides clarity on future policies and sets out the actions we can take now and, in the future, to support safe, clean, and efficient freight operations. These actions are fundamental to achieving the Mayor's vision for London – a city which is better to live and work in for all Londoners.

#### **DELIVERY AND SERVICING PLAN GUIDANCE, 2020**

- 2.4.11. This document replaces the previous Guidance which was prepared for a past Mayor's Transport Strategy (MTS) in London. It provides links to tools and templates to help you prepare a DSP. Planning authorities, such as London boroughs, also produce their own guidance which should be used.
- 2.4.12. It outlines how a Delivery and Servicing Plan should include:

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 "The physical design and layout of the site, and how it provides adequate provision for delivery and servicing activity from day one;

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- The day-to-day policies and measures which will be implemented so that deliveries and servicing are appropriately managed, and how the disruption and environmental impact of that activity locally will be minimised over time. It should set appropriate targets for continuous improvement; and
- It also sets out the forecast trip rates for the site."

#### TRANSPORT FOR LONDON - DELIVERIES IN LONDON

- 2.4.13. TfL work with operators, boroughs, and partners across the freight industry to ensure that goods and services get delivered in London on time, and in a safe, clean, and efficient way.
- 2.4.14. The 'Deliveries in London' online portal provides advice on making and receiving deliveries, including parking and loading, delivering efficiently, and driving near vulnerable road users. The guidance portal seeks to:
  - Ensure that London's transport networks allow for the efficient and reliable handling and distribution of freight and the provision of servicing to support London's economy.
  - Minimise the adverse environmental impact of freight transport and servicing in London.
  - Minimise the impact of congestion on the carriage of goods and provision of servicing.
- 2.4.15. This section provides a summary of TfL's guidance and best practice in relation to deliveries and servicing.

#### TRANSPORT FOR LONDON - RETHINKING DELIVERIES REPORT

- 2.4.16. The Rethinking Deliveries Report seeks to understand different delivery strategies currently employed across the world and subsequently implement effective solutions on a wider scale in both the private and public sectors.
- 2.4.17. The goal of the Report is to consolidate deliveries, reducing the number of vehicles carrying freight into a city by improving utilisation of available vehicle capacity. Consolidation solutions can be split into either behavioural or physical solutions, as follows:
  - Behavioural solutions:
    - Procurement led solutions.
    - Upstream supply chain
    - Click & collect at store.
  - Physical solutions:
    - Urban consolidation centres
    - Micro-consolidation centres
    - Locker boxes / locker banks
    - Pick-up drop-off (PUDO) facility shop
- 2.4.18. The Rethinking Deliveries Report identifies that working in tandem "with neighbouring organisations in joint procurement and consolidation has the potential over the longer term to reduce costs, streamline ordering processes, enhance collaborative working and minimise environmental impacts."

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# GETTING THE TIMING RIGHT: MAKING THE MOST OF QUIETER TIMES FOR DELIVERIES (2014)

- 2.4.19. This Guidance aims to help local authorities, businesses and fleet operators make the most of the opportunities that re-timing deliveries can offer, outlining the benefits and key issues to consider when planning deliveries.
- 2.4.20. Relating to businesses specifically, this Guidance sets out that re-timing deliveries brings the following benefits:
  - More cost-effective deliveries, at a time to suit the business.
  - More reliable delivery patterns, as journeys are less likely to be delayed by congestion, enabling businesses to plan the working day more effectively.
  - A better experience for customers if products are always available when they want them, premises are clear of delivery equipment and staff have more time to focus on offering a good service.
  - Being a better neighbour and enhancing corporate social responsibility by reducing the number of vehicles delivering to site.
- 2.4.21. The Guidance Documents also explain that, provided deliveries are completed quietly, spreading them more evenly throughout the day ensures a better environment for businesses, residents, and visitors to the area. Other benefits of spreading deliveries include:
  - Safer streets, with less risk of collisions between goods vehicles and vulnerable road users.
  - Reduced congestion and more efficient use of on-street loading facilities.
  - Air quality improvements, as traffic moves around the area more easily.

#### **CODE OF PRACTICE FOR QUIETER DELIVERIES (MAY 2018)**

- 2.4.22. TfL's Code of Practice for Quieter Deliveries, (May 2018) offers guidance on how to minimise noise from out-of-hours deliveries. This Guidance provides a list of general guidance pointers, as well as measures for drivers and measures to reduce noise at the delivery point. Key measures include.
  - Ensure staff are trained and able to safely use any equipment required.
  - Ensuring all equipment is well maintained and in good working order.
  - Using quieter vehicles and equipment where possible e.g., quiet roll cages, rubber floor mats.
  - Making sure all colleagues involved are briefed and trained appropriately and are aware of the Code of Practice.
  - Ensure the delivery point and surrounding areas are clear of obstructions so vehicles and colleagues can manoeuvre easily.
  - Liaising with suppliers to minimise the likelihood of vehicles arriving at the same time.
  - Ensuring the driver is aware of any local access issues.
  - Plan ahead to ensure you know the location of the delivery point and the appropriate access route.



#### FLEET OPERATOR RECOGNITION SCHEME

- 2.4.23. The Fleet Operator Recognition Scheme (FORS) is a voluntary scheme that encourages sustainable best practice for fleet operators. FORS promotes safe working practices, legal compliance, and a corporate social responsibility to improve the performance of fleet operators. The project has been developed with trade union involvement and collaboration with fleet operators and the facility of sharing information.
- 2.4.24. Operators join the scheme as members, with tiers of membership reflecting fleet operator achievements. It will offer members incentives to increase the sustainability of their operations and to develop their skills, including best practice development for:
  - Training to improve safety and reduce CO<sub>2</sub> and emissions.
  - Maintenance, to improve safety and reduce fuel consumption, CO<sub>2</sub>, and emissions.
  - Management of road risk to improve safety, particularly for pedestrians and cyclists.
  - Fuel efficiency, to save costs and reduce CO<sub>2</sub> and emissions.
  - The use of low-carbon engine technologies such as hybrid and electric vehicles, hydrogen fuel cells and biofuels to reduce CO<sub>2</sub> and emissions.

#### TRANSPORT FOR LONDON: DELIVERY AND SERVICING PLANS - MAKING FREIGHT **WORK FOR YOU**

- 2.4.25. TfL provide additional guidance on the production of Delivery and Servicing plans within their on-line document entitled Delivery and Servicing Plans: Making Freight Work for You. The document identifies that the plan needs to be tailored to the specific requirements of the building, but outputs can include:
  - Proactively managing deliveries to reduce the number of delivery and servicing trips, particularly in the morning peak.
  - Identify areas where safe and legal loading can take place.
  - Select delivery companies who can demonstrate their commitment to following best practice for example, FORS members.
- 2.4.26. This Guidance also identifies out some of the most effective tools and techniques to minimise the impact of freight activity on London's roads.

#### 2.5 LOCAL POLICY

#### **LONDON BOROUGH OF CAMDEN'S LOCAL PLAN (2017)**

- LBC's 'Local Plan' adopted on 3rd July 2017 is the main planning guidance document for development 2.5.1. projects in the Borough. Until 2031, it forms part of the statutory development plan for the Borough against which planning applications are assessed.
- 2.5.2. Policy T4 – Sustainable movement of goods and materials states that:

"The Council will promote the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road. We will:

encourage the movement of goods and materials by canal, rail and bicycle where possible;



- protect existing facilities for waterborne and rail freight traffic; and
- promote the provision and use of freight consolidation facilities.

Developments of over 2,500 sqm likely to generate significant movement of goods or materials by road (both during construction and operation) will be expected to:

- minimise the impact of freight movement via road by prioritising use of the Transport for London Road Network or other major roads;
- accommodate goods vehicles on site; and
- provide Construction Management Plans, Delivery and Servicing Management Plans and Transport Assessments where appropriate."

# LONDON BOROUGH OF CAMDEN'S TRANSPORT SUPPLEMENTARY PLANNING GUIDANCE (2021)

2.5.3. In LBC's Transport Supplementary Planning Guidance (2021), Section 4 on Delivery and Servicing Management Plans states that:

"In order to proactively manage delivery and servicing arrangements, the Council will seek DSPs for all major developments, and for those developments where it is identified through a Transport Assessment that the scheme is likely to impact on amenity or the safe and efficient operation of the transport network. Examples of when a DSP should be prepared are:

- The expected number of deliveries at any one time exceeds the capacity of the onsite loading provision.
- The existing on-street provision limits additional loading from proposed development.
- The cumulative impact of deliveries from the site and those sites within the vicinity adversely
  affects the transport network.
- The site is adjacent to existing infrastructure, for example, cycle lanes or bus stops; and/or
- Loading occurs on a high street or within a busy town centre.

The Council will also seek to secure DSPs for any development required to submit a Travel Plan."

#### **CITY OF LONDON LOCAL PLAN (2015)**

2.5.4. The adopted Local Plan (2015) sets out CoL's vision for shaping the Square Mile in the future and policies used to guide planning decisions. It forms the statutory development plan for the CoL along with the adopted London Plan. The overarching strategy for the CoL is its sustainable community strategy 'The City Together Strategy: The Heart of a World Class City.' The Vision for the City Together Strategy is:

'The City Together will work to support the City of London as a leading international financial and business centre in a way that meets the needs of its diverse communities and neighbours.'

2.5.5. In relation to Delivery and Servicing Plans, Policy DM 16.1 – Transport Impacts of Development states that:

"Delivery and Servicing Plans will be required for all major development and any other development that will cause significant transport impacts on the local or wider area, through operational deliveries and servicing."

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#### **CITY OF LONDON DRAFT CITY PLAN 2040 (2021)**

- 2.5.6. The CoL Corporation is consulting on the Draft City Plan (2040) and its Transport Strategy. This provides a framework for future development in the Square Mile, outlining priorities for CoL's people, businesses, places, and spaces until 2040 and beyond.
- 2.5.7. The Draft City Plan is currently subject to consultation on the Revised Proposed Submission Draft City Plan 2040.
- 2.5.8. Some of the key proposed policies regarding Delivery and Servicing are outlined below.
- 2.5.9. Strategic Policy S9: Vehicular Transport and Servicing outlines that:

Developers are required to "demonstrate, through Transport Assessments, Construction Logistics Plans, Travel Plans, Cycling Promotion Plans and Delivery and Servicing Plans, how the environmental impacts and road danger of travel and servicing will be minimised as a result of their development, including through the use of river transport."

2.5.10. Section 6.2.27 further elaborates how the policy works detailing how:

"Delivery and Servicing Plans (DSP) will be required for all major commercial development over 1,000m2 and any other development or refurbishment that will cause significant transport impacts on the local or wider area through operational 128 deliveries and servicing.

For smaller development a DSP is encouraged, and may be required in sensitive areas, as a tool to effectively manage delivery and servicing movements. Where consolidation of servicing and deliveries is proposed, the number of vehicle trips that have been avoided as a result should be set out in the DSP.

Consideration should be given to smart or joint procurement measures with other businesses to reduce the numbers of deliveries and servicing trips required to the premises. Details should be set out in the DSP.

Where any sort of consolidation centre is to be used, a commitment to the use of zero or low emission vehicles, and appropriate routeing should be included in the DSP. Within the Square Mile, DSP's should take account of the City's street hierarchy when considering routeing arrangements and should address the potential for use of the River Thames to reduce congestion caused by servicing and deliveries.

The DSP should set out proposals for monitoring of delivery and servicing arrangements, including the use of consolidation. The City Corporation will work with developers and occupiers to monitor the actual reductions in deliveries achieved through consolidation."

#### **CITY OF LONDON DELIVERY AND SERVICING GUIDANCE DOCUMENT IN 2017**

2.5.11. The CoL released a draft of the City of London Delivery and Servicing Guidance document in 2017. It states that:

"The note provides information on how to develop a new or revise an existing DSP that may be out of date. It outlines the benefits of managing deliveries and servicing through a DSP, and includes details of current best practice, and links to other relevant guidance."

"A strong DSP can benefit the city as a whole, as well as the individual organisation. The City of London Local Plan currently requires a DSP to be produced for all major developments over 1,000

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sqm, or where the development is likely to cause significant impacts on the network. Smaller developments which do not currently have a formal requirement can also voluntarily adopt a DSP to help manage deliveries to the site. Many of the benefits to the individual organisation will still apply, and although the overall impact for the city as a whole may be smaller, there are likely to be significant local benefits."

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#### 3 DELIVERY AND SERVICING PLAN

#### 3.1 INTRODUCTION

3.1.1. This chapter details the proposed delivery and servicing arrangements for the Site. The delivery and servicing strategy for the proposed development has been devised in agreement with the highway authorities.

#### 3.2 PROPOSED SERVICING ARRANGEMENTS

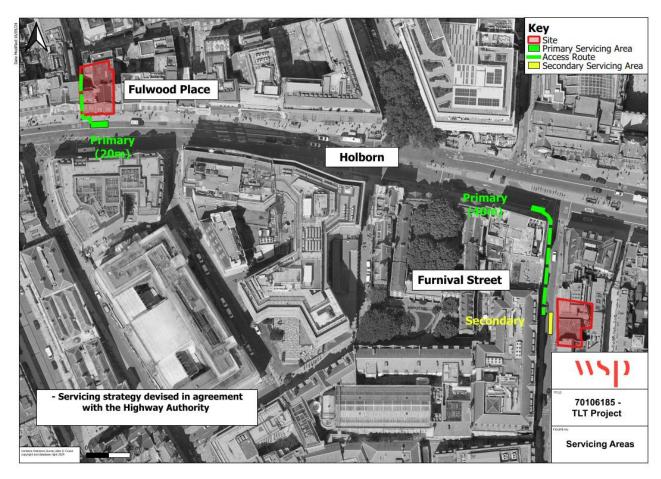
- 3.2.1. As stated above, the London Plan (2021), Camden Local Plan (2017), and the Draft City of London Local Plan (2021) require all servicing and refuge collection to be provided on-site where possible and measures to reduce the impact of servicing on the highway network.
- 3.2.2. However, with consideration to Site constraints, and particularly for this historical and unique site, all servicing will take place directly on street from Holborn (primary servicing location) and Furnival Street (secondary servicing location). This has been agreed with respective highway authorities.
- 3.2.3. It is predicted that some eight delivery vans could be expected as part of the operation of the Proposed Development at the Furnival Street entrance on a typical day. This number could increase up to approximately 14 vans during times when exhibition set up is required. All delivery activity will take place outside of opening hours and predominantly between 2000-2200 hours. Dwell times for vans are not expected to be long. Larger vehicles are not expected at the site because deliveries will typically need to be taken into a lift which has capacity and weight limits. Such deliveries may take place directly from the southern side of Holborn (approximately a 40m drag distance to the Site) or Furnival Street.
- 3.2.4. Refuse collection arrangements for the Proposed Development will be similar for prevailing arrangements of neighbouring buildings.
- 3.2.5. It is noted that approximately two delivery trips would be associated with the bar daily, proposed to take place on the northern side of Holborn. The figure below demonstrates the Primary and Secondary servicing locations.

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Figure 3-1 – Primary and Secondary Servicing Locations



3.2.6. The existing highway arrangements support on street servicing. Moreover, public realm improvements are proposed on Furnival Street to benefit the Proposed Development and wider community. Any improvements works are subject to detailed design. The intended public realm improvements will facilitate on street servicing on Furnival Street as demonstrated in the figure above and at **Appendix A**.

#### 3.3 FORECAST SERVICING MOVEMENTS

- 3.3.1. The DSP provides a forecast of the estimated number of delivery and servicing vehicle trips which have been calculated based on each land use (NIA):
  - Permanent exhibitions- 3,374sqm
  - Temporary / rotating exhibitions- 1,142sqm
  - Bar -293sqm
  - Gift shop- 118sqm
  - Front of house- 6171sqm
  - Back of house- 1461sqm
- 3.3.2. The delivery and service vehicle trips have been obtained from a recent planning application for a similar development for the conversion of Smithfield Market into a new museum with flexible retail, proposed under planning application ref: 19/01343/FULEIA.
- 3.3.3. Table 3-1 details the permitted servicing trip rates used within the Smithfield Market application.

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Table 3-1 - Servicing Trip Rates

Land Use	Daily Trip Rate
Museum D1- Ancillary Office	0.21 trips per 100 sqm (NIA)
Museum D1- Ancillary Food Retail	2.00 per 100 sqm (NIA)
Museum D1- Ancillary Non-food Retail	0.59 per 100 sqm (NIA)
Museum D1- Permanent Exhibitions / front of house / Public Spaces	0.04 per 100 sqm (NIA)
Museum D1- Temporary Exhibitions	0.69 per 100 sqm (NIA)
Museum D1- Technicians Space / Back of House	0.10 per 100 sqm (NIA)

3.3.4. The number of vehicle trips based on the trip rates presented within Table 3-2 are shown below.

**Table 3-2 – Servicing Trip Generation** 

Land Use	Maximum Number of Daily Trips
Permanent Exhibition	2
Rotating Exhibition	8*
Bar	2
Gift shop	1
Front of house	2
Back of House	1
Total	16

<sup>\*</sup>The rotating exhibition will have a larger servicing demand of up to 8 movements a day during periods when the exhibition is being rotated.

3.3.5. It is predicted that some eight delivery vans could be expected as part of the operation of the proposed development at the Furnival Street entrance on a typical day, which will be serviced from Holborn. This number could increase up to approximately 14 vans during times when exhibition set up is required. All delivery activity will take place outside of opening hours and predominantly between 2000-2200 hours and 0700-0800 hours. Dwell times for vans are not expected to be long. Larger vehicles are not expected at the site because deliveries will typically need to be taken into a lift which has capacity and weight limits.

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- 3.3.6. Refuse collection arrangements for the proposed development will be similar for prevailing arrangements of neighbouring buildings. It is noted that approximately two delivery trips would be associated with the bar daily, proposed to take place on Holborn.
- 3.3.7. Swept path analysis of a 6.6m long refuge vehicle to the secondary servicing point on Furnival Street has been conducted and is shown in the figure below.

South Parts Wicking South

Figure 3-2 - Secondary Servicing Arrangements including Waste Collection

#### 3.4 HGV DELIVERIES

3.4.1. Due to the nature of the Proposed Development, no equipment larger than the lift cars will be able to access the Tunnels once operational. The lift car proposed to be used has dimensions of 1500mm x 1800mmn. On this basis, it is not expected for any HGV deliveries to occur once the Proposed Development is operational. HGV deliveries will therefore only occur during the construction phase. Methods to manage this impact are included within the Construction Traffic Management Plan submitted as part of this planning application.

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#### 4 DELIVERY AND SERVICING PLAN OBJECTIVES

#### 4.1 OBJECTIVES

- 4.1.1. DSPs developed through the planning process seek to support sustainable development. They are drafted within the context of the guidance provided within the London Freight Plan and TfL's best practice guidance.
- 4.1.2. This DSP will therefore seek to achieve the following objectives:
  - Demonstrate that goods and services can be delivered, and waste removed, in a safe, efficient, and environmentally friendly way.
  - Identify deliveries that could be reduced, re-timed or even consolidated, particularly during busy periods.
  - Improve the reliability of deliveries to the Site.
  - Reduce the operating costs of building occupants and freight companies.
  - Reduce the impact of freight activity on residents and the environment.

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#### 5 DELIVERY AND SERVICING MANAGEMENT MEASURES

#### 5.1 INTRODUCTION

- 5.1.1. This section outlines the overarching measures and initiatives included within the DSP which are applicable to the Proposed Development.
- 5.1.2. This DSP will specifically aim to ensure that servicing of the Proposed Development can be carried out efficiently, without creating any negative impacts upon the local highway network, visitors, neighbouring residents and commercial occupiers within and surrounding the Site, and the neighbouring environment.
- 5.1.3. In accordance with TfL's best practice guidance contained within their document entitled 'Managing Freight Effectively: ODSPs, the proposed management measures and initiatives have been grouped into the following areas:
  - Design;
  - Procurement strategy;
  - Operational efficiency;
  - Waste management; and
  - Road trip reduction.
- 5.1.4. The London Freight Plan recognises that good design can minimise disturbance for residents at or travelling to the Site, and the impact of servicing upon the surrounding highway network. Design related measures included as part of the Proposed Development are set out in turn below.

#### 5.2 MANAGING DELIVERIES

#### **SERVICING FACILITIES**

5.2.1. The Proposed Development has been designed to ensure that all servicing activities are undertaken on side roads rather than the A40 (High Holborn). This is to ensure that the servicing impact of the Proposed Development on the surrounding highway network is minimised as far as possible.

#### **RISK ASSESSMENT OF SERVICING AREAS**

- 5.2.2. A risk assessment would normally be undertaken by suitably trained site management staff prior to use. This assessment will examine the following issues:
  - Adequate manoeuvring space for the vehicles;
  - Pedestrian requirements and safety;
  - Adequate space for unloading;
  - Level route from vehicle to destination;
  - Interaction with vehicles; and
  - Visibility of management staff.



#### **SECURITY MEASURES**

5.2.3. Security measures will be provided within the Proposed Development by an onsite security team. The security team will be appointed to assist with the movements of servicing goods.

#### **ACCOMMODATING SPECIAL DELIVERIES**

5.2.4. Any special deliveries to the Site, such as plant maintenance vehicles, will need to be pre-arranged. The delivery time and duration will be negotiated with the site management office to minimise the impact upon the routine daily servicing requirements of the Proposed Development. Out of peak deliveries will be encouraged for such deliveries where possible to reduce the impact on surrounding occupiers and residents.

#### 5.3 PROCUREMENT STRATEGY

5.3.1. Procurement processes should demonstrate an awareness of all vehicle activity associated with the Site, its impacts, and appropriate measures to reduce it. This will be undertaken by site management.

#### FLEET OPERATOR RECOGNITION SCHEME

5.3.2. Commercial occupiers will be encouraged to contract suppliers registered with a best practice scheme, such as the Fleet Operator Recognition Scheme (FORS). Full details of the benefits associated with FORS are detailed earlier within section 2.4.23 of this document.

#### **CONSOLIDATION OF SUPPLIERS**

5.3.3. Site management will be encouraged to coordinate deliveries in instances where common suppliers are used.

#### 5.4 OPERATIONAL EFFICIENCY

#### **DELIVERY RESTRICTIONS AND ENFORCEMENT**

5.4.1. Peak hour deliveries and deliveries whilst the Proposed Development is open to the public will be discouraged through consultation by the site managers. The operation of the Proposed Development will benefit from spreading deliveries throughout the day using a computer / web-based vehicle booking system.

#### **COMMUNICATION OF DELIVERY PROCEDURES**

5.4.2. The delivery procedures in operation on the Site will be communicated to staff upon occupation. The site management team will be responsible for informing their suppliers of any delivery restrictions and communicating the booking / management strategy.

#### MANAGEMENT STRATEGY

5.4.3. A workplace vehicle booking / management system will be implemented on the Site to manage and schedule vehicle activity at the servicing area. The system will be managed by the site-based management agent.

#### **OUT OF HOURS DELIVERIES**

5.4.4. All deliveries will be expected to take place outside peak hours and outside the hours when the Proposed Development will be open to the public. Due to the proposed timing, a noise abatement

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strategy will operate, whereby servicing vehicles would be instructed by the management office to turn off their engines once parked, for the duration of servicing activity.

#### STAFF TRAINING REQUIREMENTS AND RESPONSIBILITIES

5.4.5. The appointed site-based management agent will be responsible for providing the funding and time resources for all their site-based staff to receive appropriate training relating to the processes and procedures in operation at the Site. On-going training requirements will be identified through annual Personal Development Reviews (or equivalent internal review process).

#### 5.5 WASTE MANAGEMENT

#### WASTE REDUCTION, STORAGE, AND REMOVAL MEASURES

- 5.5.1. Guidance contained within the London Freight Plan identifies that developments should provide sufficient facilities for storage and collection of segregated waste.
- 5.5.2. The Proposed Development will provide segregated waste storage. Waste is segregated into general waste, dry comingled recyclables, and wet / organic waste. Provision for recyclables will be provided within the Site in accordance with the CoL and LBC planning policy.

#### REFUSE COLLECTION PROCEDURES

- 5.5.3. Refuse collection will be undertaken outside of the peak hours and the Proposed Development's opening hours where possible, with the specific collection times being arranged with the local authority or private waste contractor to minimise impacts upon the operation of the Proposed Development and the surrounding occupiers, residents and the public.
- 5.5.4. All refuse collection will be undertaken from the carriageway.

#### 5.6 ROAD TRIP REDUCTION

#### **ENCOURAGING DELIVERIES BY SUSTAINABLE MODES**

- 5.6.1. Measures which will be recommended to suppliers include choosing the most appropriate delivery mode. For example, using smaller vehicles or motorcycles where possible; switching to hybrid and / or electric vehicles; and seeking to ensure safe, efficient, and considerate operations, such as switching off engines when making deliveries.
- 5.6.2. The London Low Emission Zone will also require suppliers operating delivery vehicles which do not meet emission standards, to pay a daily charge for journeys within London.

#### **ENFORCEMENT**

5.6.3. The contents of this DSP have been prepared in order to inform the CoL and LBC of the Applicant's intention for the delivery and servicing strategy for the Proposed Development. The Applicant expects, in line with policy, that compliance with the DSP will be secured, as appropriate, on the grant of planning permission.

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#### 6 MONITORING AND REVIEW

#### 6.1 MONITORING

- 6.1.1. A programme of monitoring and review will be implemented to generate information by which the success of the DSP can be evaluated against the objectives set out within Chapter 4.
- 6.1.2. Monitoring and review of deliveries to the Proposed Development will be the responsibility of the logistics manager (or appointed consultant).
- 6.1.3. A delivery survey will be undertaken within 6 months from occupation of the Proposed Development. The delivery survey will be undertaken in accordance with the standard TRICS Delivery Survey Methodology or similar. The delivery survey will be undertaken simultaneously with the travel surveys associated with the implementation of the Travel Plan, where timescales permit.
- 6.1.4. The logistics manager (or appointed consultant) will arrange further delivery surveys to be undertaken on the third and fifth year after the initial survey. Monitoring reports will be prepared to summarise the result of each survey for submission to the CoL and LBC.

#### 6.2 REVIEW

- 6.2.1. The logistics manager (or appointed consultant) will report the survey results to the CoL and LBC within one month of the survey being undertaken. The results of the delivery survey will then be reviewed in consultation with the local planning authorities.
- 6.2.2. This process will provide the opportunity for current delivery operations and procedures on the Site to be reviewed and new management measures to be implemented, if necessary, to achieve the objectives set out within this DSP.
- 6.2.3. Table 6.1 shows the DSP's continued review and monitoring programme.



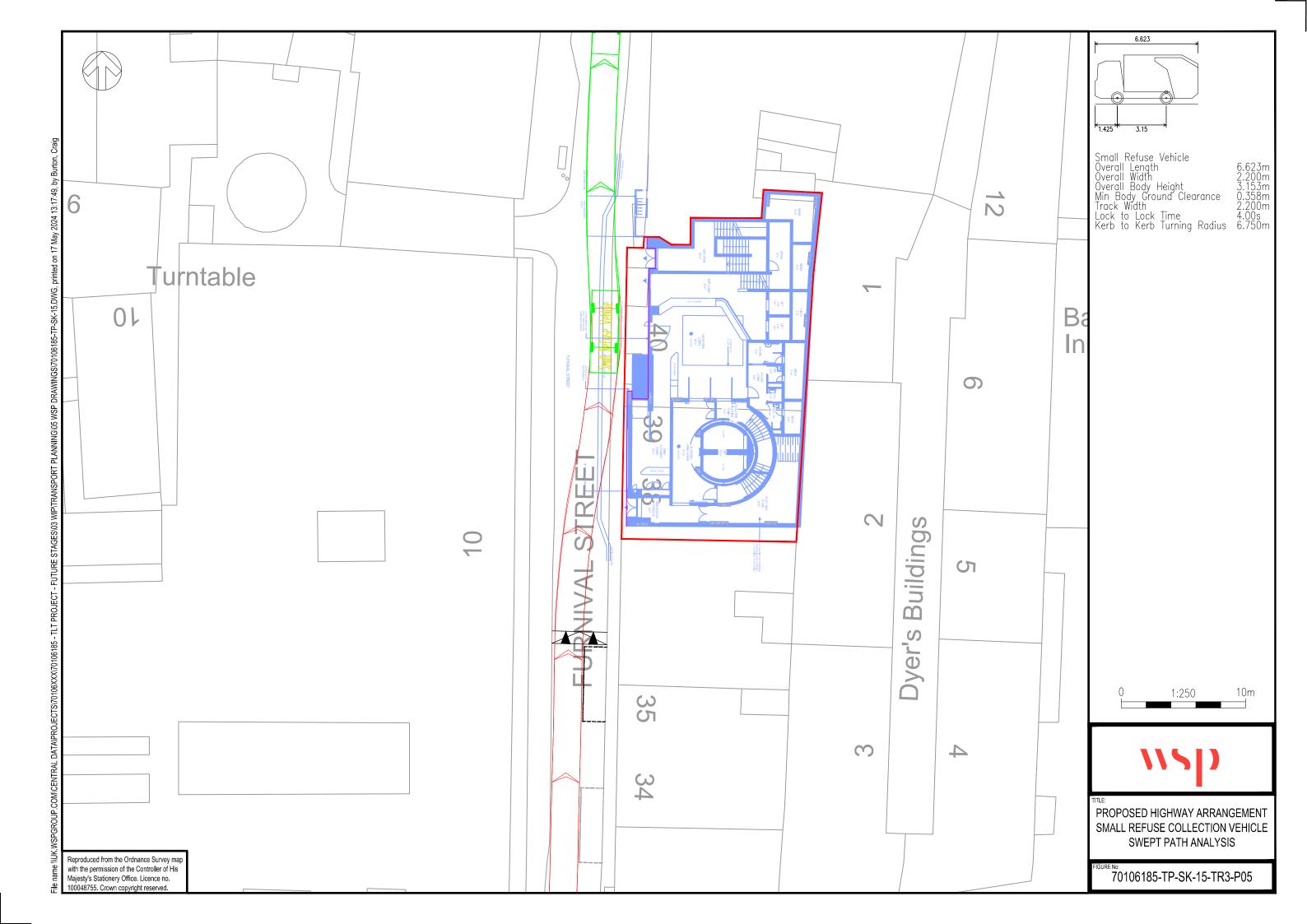
**Table 6-1 - DSP Ongoing Review Programme** 

Action	Timescale
Produce and Implement the Delivery & Servicing Plan	Within 3 months of opening
Servicing and Delivery vehicles Survey (TRAVL Complaint format)	Within 6 months from the Site's opening.
Future Surveys to update the Delivery & Servicing Plan	3rd and 5th year
Feedback to the Management Company regarding the service and delivery arrangement and other related issues	Quarterly following the meetings between the occupiers and management company
Strategic Review of the Delivery & Servicing Plan	Within 6 months of opening and after 3 <sup>rd</sup> and 5th years

# Appendix A

**SERVICING VEHICLE SWEPT PATH** 







WSP House 70 Chancery Lane London WC2A 1AF

Phone: +44 20 7314 5000

WSP.com