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247 TOTTENHAM COURT ROAD

Framework Delivery and Servicing Plan

22/11/2024

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DOCUMENT CONTROL ISSUE SHEET

Project & Document Details

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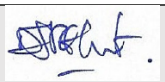
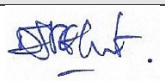
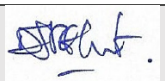
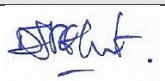
2.0	21/07/2020	LS	OB	D Hart	
3.0	29/07/2020	LS	OB	D Hart	
4.0	06/11/2024	KL	NBO	D Hart	
5.0	22/11/2024	KL, RO	NBO	D Hart	

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1. INTRODUCTION

1.1 Context and Objectives

1.1.1 This Framework Delivery and Servicing Plan (DSP) has been prepared by Momentum Transport Consultancy (Momentum) on behalf of Prudential UK Real Estate Nominee 1 Limited and Prudential UK Real Estate Nominee 2 Limited ('the Applicant') in support of a Non-Material Amendment to the Framework DSP submitted as part of planning application 2023/1155/P.

1.1.2 Full Planning permission 2020/3583/P was granted on 30 July 2021 for the comprehensive redevelopment of the existing buildings at 247 Tottenham Court Road, Bloomsbury, W1T 7QZ within the jurisdiction of the London Borough of Camden (LB Camden). On 21 March 2023 a Section 73 application was approved (ref. 2023/1155/P) which granted minor design amendments to the roof plant layout, green roof and amendments to the layout and quantum of PVs.

1.1.3 The development proposals (herein referred to as "the Proposed Development"), designed by Stiff & Trevillion, consisted of the following:

Variation of condition 2 (approved drawings) of planning permission ref 2020/3583/P dated 30/07/2021 (for the demolition of 247 Tottenham Court Road, 3 Bayley Street, 1 Morwell Street, 2-3 Morwell Street and 4 Morwell Street and the erection of a mixed use office led development comprising ground plus five storey building for office (Class B1) use, flexible uses at ground and basement (Class A1/A2/A3/B1/D1/D2), residential (Class C3) use, basement excavation, provision of roof terraces, roof level plant equipment and enclosures, cycle parking, public realm and other associated works), namely to include alterations to plant and plant enclosures, changes to cores and lift overruns for fire safety, increase in area of green roof and PV panels, and new escape gate, all at roof level.

1.1.4 A delivery trip generation has been undertaken to estimate the number and type of vehicles that would be generated by the development. This DSP provides a management strategy which aims to prevent conflicts over available space in the public highway and consequent disruption to the surrounding road network.

1.1.5 This DSP sets out the proposed delivery, servicing and waste management strategy for the Proposed Development. The plan would be used to support the design of the servicing arrangements and to clarify the operational regimes to ensure that the servicing of the development operates effectively.

1.1.6 This revision updates the prior DSP for the site to enable Retail unit 4 located on Tottenham Court Road to be serviced through the front door.

1.2 Delivery and Servicing Plan Objectives

1.2.1 The objectives of the DSP are to minimise the impact of delivery and servicing vehicle movements through planning, sustainable procurement practices, and a reduction in waste generation. The following benefits are targeted through the DSP:

- Reduce the number of deliveries through planning and the scheduling of goods to be delivered outside peak periods and the use of consolidation

- Encourage the use of sustainable freight modes or greener vehicles
- The completion of periodical reviews and updates of the DSP and the active management of ongoing developments through developer and tenant participation, implementing procedures to inform the site occupiers about the DSP in practice
- Good communication between all parties involved in the process (suppliers, staff, the local authority and development manager)
- The efficient usage of available facilities.

1.3 Site Context

1.3.1 The site is located within the LB Camden on Tottenham Court Road, Bloomsbury. The site location is provided in Figure 1.1.

1.3.2 The site is bounded by Tottenham Court Road to the west, Bayley Street to the north and Morwell Street to the east. To the south is the 1 Bedford Avenue development.

1.4 Scope of the Delivery and Servicing Plan

1.4.1 The DSP covers the following:

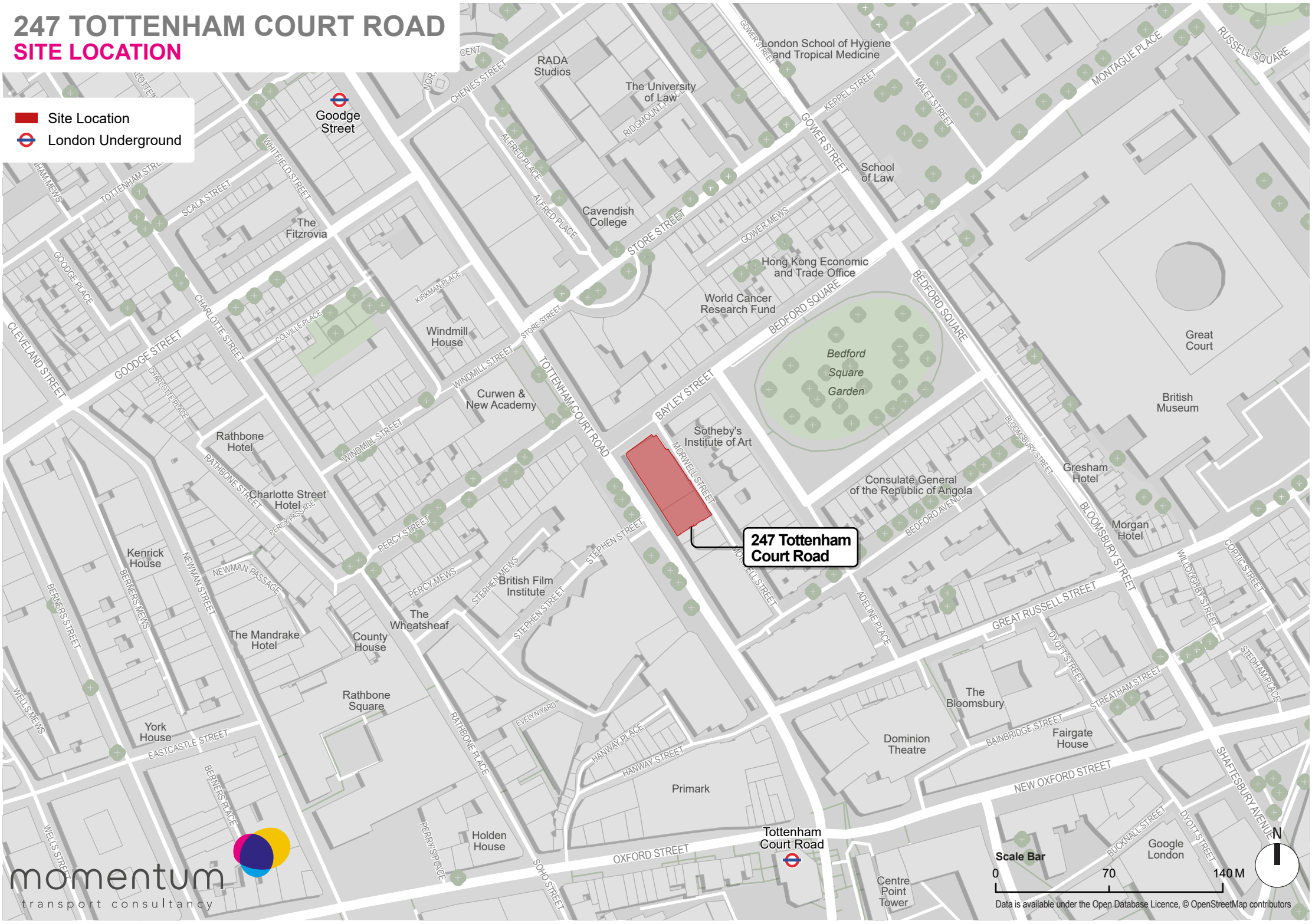
- DSP objectives
- Policy Context
- Development Proposals
- Proposed Delivery and Servicing Strategy
- Trip Rates and Vehicle Assumptions
- Waste Management Strategy
- DSP Measures
- DSP Management Strategy – Monitoring and Review

1.5 Policy Context

1.5.1 The DSP has been prepared following best practice guidance and policies set out in:

- TfL Delivery Servicing Plans: Making Freight Work for You
- TfL Managing Freight Effectively: Delivery and Servicing Plans
- TfL Freight and Servicing Action Plan (2019)
- Camden Local Plan (2017)
- Camden Planning Guidance on Transport (2019)

247 TOTTENHAM COURT ROAD
SITE LOCATION



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2. POLICY CONTEXT

2.1 National Planning Policy

NATIONAL PLANNING POLICY FRAMEWORK (2023)

2.1.1 The National Planning Policy Framework (NPPF) was produced in December 2023 by the Department for Levelling Up, Housing and Communities.

2.1.2 The framework sets out the Government's planning policies and how these are expected to be applied. The NPPF replaces almost all existing national guidance in the form of Planning Policy Guidance (PPGs) and Planning Policy Statements (PPSs), although the accompanying guides largely remain in force.

2.1.3 The NPPF requires the following to be ensured when assessing any development proposals:

- "Appropriate opportunities to promote sustainable transport modes can be, or have been taken up, given the type of development and its location;
- Safe and suitable access to the Site can be achieved for all users; and
- Any significant impacts from the development on the transport network can be cost effectively mitigated to an acceptable degree."

2.1.4 The NPPF (2023, Para.117) requires "all developments that will generate significant amounts of movement to provide a Travel Plan, and the application should be supported by a Transport Statement or Transport Assessment so the likely impacts of the proposal can be assessed". A Travel Plan is required to ensure that the occupant will promote the use of sustainable transport.

BREEAM UK NEW CONSTRUCTION: NON-DOMESTIC BUILDINGS – TECHNICAL MANUAL (2018)

2.1.5 This BREEAM document is an update on the preceding 2014 version and describes an environmental performance standard against which buildings in the UK can be assessed, rated and certified. A key metric BREEAM assesses is operational waste, for non-residential use only.

2.1.6 The aim of minimum standards regarding waste is to recognise and encourage the provision of dedicated storage facilities for a building's operational-related recyclable waste streams so that this waste is diverted away from landfill or incineration.

2.1.7 The key parameters to achieve compliance include the segregation of stored waste and an adequate and accessible waste storage area for each waste type.

2.2 Regional Planning Policy

THE LONDON PLAN (2021)

2.2.1 The London Plan was adopted in March 2021 and sets out the integration between housing, social, economic, cultural, environmental and transport policies for London over the next 25 years.

2.2.2 Policy T7 states, "Delivery and Servicing Plans should demonstrate how the requirements of the Site are met, including addressing missed deliveries." (10.7.5)

2.2.3 Policy T7 also states that, “Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing”

2.2.4 The Plan also specifies that “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.”.

THE MAYOR’S TRANSPORT STRATEGY (2018)

2.2.5 The Mayor’s Transport Strategy was adopted in March 2018 and outlines a vision to reduce Londoners’ reliance upon use of private cars by encouraging a modal shift to walking, cycling and public transport uses. A central aim of the Mayor’s Transport Strategy is for 80% of Londoners to make trips by these modes by 2041. In addition, the Transport Strategy includes targets to significantly reduce total traffic by 10-15% by 2041, and freight traffic in Central London by 10% by 2026.

2.2.6 Plans for delivery and servicing look to promote planning permissions to secure delivery and servicing plans in support of off-peak (including night-time) deliveries. Additionally, support is shown for waste consolidation implementation through use of a formal commercial waste zone framework. Introduction of regional consolidation and distribution centres were proposed, potentially in conjunction with micro-distribution centres within inner and outer London.

THE FREIGHT AND SERVICING ACTION PLAN (2019)

2.2.7 The Freight and Servicing Action Plan sets out the steps that need to be taken to address the increase in demand for freight and servicing. The plan contains proposals to deliver improvements to the operational efficiency, environmental impacts and safety of freight and logistics within Greater London, alongside other proposals designed to improve understanding of freight issues and contribute to the longer-term process of addressing London’s transport needs. Key projects supporting the delivery of the plan are:

- Efficient Deliveries Toolkit
- Freight Operator Recognition Scheme (FORS)
- HGV Safety Direct Vision Standards
- Construction Logistics and Community Safety Standard (CLOCS)
- Delivery and Servicing Plans
- Construction and Logistics Plan
- The Ultra-Low Emission Zone (ULEZ)

2.2.8 The efficient deliveries toolkit includes guidance for businesses on how to time deliveries outside the peak hours, reduce personal deliveries to the workplace and implement waste consolidation. The plan outlines different types of consolidation centres, including:

- Micro-consolidation facilities – facilitating efficient last-mile deliveries via zero-emissions vehicles such as EV vans and e-Cargo bikes, particularly within Central London
- Construction consolidation centres – enabling the efficient and timely deliveries of bulky construction materials outside of the peak hours

- Waste consolidation centres – making the use of river and rail servicing to transport bulky wastes by other means than road transport

2.2.9 FORS employs a tiered set of membership levels to address fleet and freight vehicle operational efficiency, improving all areas of sustainable distribution to reduce CO2 emissions, congestion, collisions and operator costs.

2.2.10 FORS recognises legal compliance as the base 'bronze' level and promotes the uptake of best practice covering: fuel efficiency, alternative fuels and low carbon vehicles, management of road risk, legal record keeping and reducing penalty charge notices through the higher 'silver' and 'gold' levels.

2.2.11 FORS also recognises operator achievements with rewards that encourage operators to raise standards to reduce CO2 emissions and to improve vehicle facilities designed to improve HGV safety, primarily through reducing risks to cyclists.

2.2.12 The HGV Direct Vision Standard (DVS) for HGVs was created by the Mayor of London to improve the safety of all road users. The DVS uses a star system to rate Heavy Goods Vehicles (HGV) above 12 tonnes on the visibility available to the driver directly through the cab windows. The star rating system has the range zero to five.

2.2.13 The DVS is still currently at the proposal stage and is not enforceable. The DVS forms part of the proposed HGV Safety Permit, which if approved will require all HGVs over 12 tonnes which enter or operate within Greater London to hold a safety permit from 1st October 2020. All HGVs over 12 tonnes with a zero-star rating would be banned from London unless they prove a Safe System. From 2024 all zero to two-star HGVs would be banned unless they prove a Progressive Safe System is in place. A Safe System is a series of measures which reduce the risks HGVs present to vulnerable road users. The core requirements are: blind spot elimination and minimisation, warning of intended manoeuvre, minimising physical impact of a hazard. The Progressive Safe System will be the same as the Safe System but it will take into account technological improvements and equipment available by 2024.

2.2.14 The CLOCS standard aims to ensure that clients ensure that construction sites are suitable for vehicles fitted with enhanced safety features, including Direct Vision-enabled vehicles.

2.2.15 The Freight and Servicing Action Plan sets out how Delivery and Servicing Plans (DSPs) can improve freight and logistics efficiency and aims to update DSP guidance by Spring 2020.

2.2.16 The ULEZ aims to improve air quality within Central London through introducing stricter emissions limits to vehicles entering the congestion charging zone 24 hours a day, 7 days a week from April 2019, with an expansion to cover the area within the north and south circular roads by October 2021. This would require freight operators to select cleaner vehicles, with an anticipated shift from the usage of diesel vehicles to cleaner alternatives.

VISION ZERO ACTION PLAN (2018)

2.2.17 The Vision Zero Action Plan published in July 2018 sets out Policy 3 of the Mayor's Transport Strategy. This document details the proposed strategies to adopt Vision Zero for road danger in London, being zero people killed in or by a London Bus by 2030 and all deaths and serious injuries from road collisions to be eliminated on London's roads by 2041.

2.2.18 Chapter five describes how reducing the dominance of motor vehicles includes both reducing their numbers and also the dangers that they pose to vulnerable road users. A focus is placed upon larger vehicles such as Buses and HGVs, of which Direct Vision standards are to be implemented to improve the safety of HGVs.

2.2.19 It further demonstrates the importance in reducing road mileage of large vehicles in particular via consolidating construction delivery and servicing vehicles which would further help to reduce the potential for conflicts between these types of vehicles and vulnerable road users.

2.3 Local Policy

CAMDEN LOCAL PLAN (2017)

2.3.1 The Camden Local Plan is the overarching plan setting the policies to guide the future sustainable development of the borough. Policy A1: Managing the impact of development refers to how the council will manage the impact of traffic movements associated with new developments.

2.3.2 Policy A4 of the Local Plan sets out the council's policy in relation to noise and vibration and that it is appropriately considered at the design stage. Regarding deliveries, policy A4 states:

2.3.3 We will also seek to minimise the impact on local amenity from deliveries and from the demolition and construction phases of development.

2.3.4 Camden's Local Plan (para. 6.104) acknowledges that deliveries should be managed and take place between the hours of 08:00 and 20:00 to manage potential disruption and noise disturbance to nearby residential properties. LB Camden also requires the provision of loading bays within a development site to reduce the impact of delivery vehicles.

2.3.5 Freight consolidation is an approach promoted by the council whereby goods are grouped together so that fewer delivery journeys are required by road and therefore the number of vehicle trips is reduced.

2.3.6 Council policy acknowledges that the movement of goods and materials by road can have a significant impact on the environment and the health and wellbeing of residents. Therefore, LB Camden promotes more sustainable means of freight transport, including the use of cycle freight as an extension to cycle courier services and encourages developers to make provision for cycle freight as part of DSPs.

2.3.7 Policy T4: Sustainable movement of goods and materials states:

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

a. encourage the movement of goods and materials by canal, rail and bicycle where possible
b. protect existing facilities for waterborne and rail freight traffic and;
c. promote the provision and use of freight consolidation facilities.

2.3.8 Policy T4 of the Local Plan also requires goods vehicles to be accommodated on site and the preparation of Delivery and Servicing Management Plans where appropriate.

CAMDEN LOCAL PLAN DRAFT (2024)

2.3.9 The Camden Local Plan (2024) is currently being drafted and is expected to be adopted in the coming months. The draft new Camden Local Plan sets out the vision for future development in Camden for the next 15 years and includes updated planning policies and site allocations to achieve this.

2.3.10 The key transport themes revolve around car free development, cargo bike use and shared transport infrastructure.

2.3.11 Car free development would be achieved through requiring all new developments to be car free and reducing on-site parking as far as possible for re-development schemes. This would be secured through Section 106 legal Agreements. This relates to Policy T1 – Safe, Healthy and Sustainable Transport. To realise this policy the council will:

- Prioritise walking, wheeling, and cycling;
- Ensure that streets are designed to be attractive and safe; minimise opportunities for crime; and be inclusive and accessible for all, in line with the Mayor's Healthy Streets approach;
- Require development to contribute towards the delivery of highways greening measures, including tree planting, provision of pocket parks and green space, the introduction of rain gardens and other street greening measures;
- Reduce vehicle use through the delivery of car free development, provision of alternative, sustainable modes of travel, supporting improvements to and investment in public transport, and by prioritising the sustainable movement of goods, services, and materials;
- Require development to reduce and mitigate the impact of transport-based emissions and noise in Camden;
- Not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects;
- Protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance;
- Require development to contribute towards the delivery of shared transport infrastructure and services in Camden in accordance with Policy T4 Shared Transport Infrastructure and Services;
- Require development to contribute to the delivery of an efficient, well maintained highway network and kerb-side space that prioritises the sustainable movement of goods, services, materials, and people; and
- Ensure that economic growth and regeneration is both supported by, and supports, a sustainable transport network.

CAMDEN PLANNING GUIDANCE – TRANSPORT (2021)

2.3.12 The Camden Planning Guidance (CPG) on Transport has been prepared to support the policies in the Camden Local Plan 2017. It forms a Supplementary Planning Document (SPD) requiring additional consideration in planning decisions.

2.3.13 The CPG on Transport was adopted in January 2021 replacing the Transport CPG of March 2019 and supports the following Local Plan policies:

- Policy A1 Managing the impact of development;
- Policy T1 Prioritising walking, cycling and public transport;
- Policy T2 Parking and car-free development
- Policy T3 Transport infrastructure;
- Policy T4 Sustainable movement of goods and materials;
- Policy CC4 Air quality; and
- Policy D1 Design.

2.3.14 For Policy T2, in line with policies T1 and T2 in the Camden Local Plan the planning guidance states the borough's ambition to remove car parking and vehicle trips and encourage the use of more sustainable modes of transport. The council will require any new development to be car free if the development has new occupiers. This stipulation would form part of Section 106 Legal Agreements.

CAMDEN TRANSPORT STRATEGY (2019)

2.3.15 The Camden Transport Strategy (CTS) aims to transform transport and mobility in Camden, enabling and encouraging people to travel, and goods to be transported, healthily and sustainably. The CTS sets our objectives, policies and measures for achieving this goal.

2.3.16 The priorities include:

- increasing walking and cycling
- improving public transport in the borough
- reducing car ownership and use
- improving the quality of our air
- making our streets and transport networks safe, accessible and inclusive for all

2.3.17 Alongside the Camden Transport Strategy there are also a number of supporting documents. These include:

- Cycling Action Plan
- Walking and Accessibility Action Plan
- Electric Vehicle Charging Point Action Plan
- Road Safety Action Plan

CAMDEN FREIGHT AND SERVICING ACTION PLAN DRAFT (2024)

2.3.18 The draft Freight and Servicing Action Plan (FSAP) helps meet the objectives set out in the Camden Transport Strategy, which was developed after public consultation and reviewing feedback from residents alongside the adoption of the new Camden Local Plan (2024). The FSAP outlines the measures taken and future actions planned to make freight and servicing journeys safer, cleaner, and more sustainable. It is understood that the Camden Freight and Servicing Action Plan (2024) will be adopted alongside the new Camden Local Plan (2024).

2.3.19 The plan follows three principles of effective freight and servicing management. These are:

- Reduce – reducing the number of vehicles associated with freight and servicing
- Remode – Transfer the operations to low emission alternatives such as cargo bikes
- Retime – Reschedule freight operations outside of peak hours (e.g. overnight)

3. EXISTING OPERATIONS

3.1 Existing Site

3.1.1 This section describes how the buildings previously on Site operated, prior to demolition.

3.1.2 The site currently consists of 5 separate buildings:

- 247 Tottenham Court Road – Office / Retail
- 3 Bayley Street – Residential / Office
- 1 Morwell Street – Residential
- 2-3 Morwell Street – Retail / Office
- 4 Morwell Street – Office

3.1.3 Collectively, the buildings are comprised of six floors, plus one basement level and the ground floor level. Office accommodation is provided on floors two to six and retail space is provided on floors lower ground to first floor. The basement level is used for storage space.

3.1.4 The land uses and associated areas for the existing site are presented below in Table 3.1.

Table 3.1: Existing Site by Land Use and Area

Land Use	NIA (m^2)	GIA (m^2)	GEA (m^2)
Office B1	6,102	7,628	8,115
Residential C3	382	478	509
Retail A1	910	1,138	1,211
Total	**7,395**	**9,244**	**9,834**

*It is assumed that NIA = 80% GIA

**D1/B1 provision has been assessed as part of Office B1

3.2 Existing Delivery and Servicing Operations

3.2.1 Deliveries and services associated with the existing buildings at 247 Tottenham Court Road are accommodated within the small existing service area, with deliveries from larger vehicles and waste collection assumed to occur on-street informally along Morwell Street. Waste collection also takes place from Morwell Street. An existing service area is immediately adjacent to the basement car park access on Morwell Street, at the southern part of the site, but the height restrictions to access prevent this from being used for the purpose of receiving deliveries.

3.2.2 There is currently a vehicle ramp within the existing site, which services a basement car park. However, this ramp is of insufficient size to accommodate delivery and servicing vehicles, which is demonstrated in Figure 3.1, showing the impossibility of access to and egress from the existing basement for a 9.8m-long waste vehicle.

3.2.3 The existing delivery and servicing trips associated with the site have been estimated using servicing trip generation rates based on a delivery and servicing trip rates database that combines survey information from developments across Central London. These have been utilised for numerous other proposals and compare well with rates used for similar purposes elsewhere. The adopted trip rates are shown in Table 3.2.

3.2.4 An on-street loading bay is located at the southern end of Morwell Street adjacent to the 1 Bedford Avenue development.

Table 3.2: Delivery and Servicing Trip Rates

Land Use	Daily Servicing Trip Rate	Peak Hour %
Office B1	0.21 per 100m^2 NIA	10%
Residential C3	0.10 per 100m^2 NIA	5%
Retail A1	0.59 per 100m^2 NIA	15%

3.2.5 The estimated vehicle split by land use for the existing deliveries using the adopted trip rates and the existing floor areas are presented in Table 3.3.

3.2.6 For the purposes of the assessment, the existing retail floor space is assumed to be 100% non-food retail.

Table 3.3: Existing Delivery and Servicing Trips

Land Use	Daily Servicing Trips	Peak Hour Trips
Office B1	13	2
Residential C3	1	0
Retail A1	5	1
Total	**19**	**3**

**differences may occur due to rounding*

3.2.7 The estimated vehicle splits are shown in Table 3.4.

Table 3.4: Estimated Delivery Vehicle Splits by Land Use

Land Use	Cars / Vans < 7.5t	MGVs	HGVs (Rigid)
Retail A1	65%	22%	13%
Office B1	75%	18%	7%
Residential C3	80%	17%	3%

3.2.8 Based on the above vehicle splits and existing floor area splits, it is estimated that there is approximately 2 HGVs, 4 MGVs and 14 vans / cars that service the site each day.

3.2.9 Delivery vehicles are assumed to arrive at site throughout the day. It is estimated that there are approximately 19 daily delivery trips and 3 peak hour delivery trips.

3.3 Existing Waste Management Arrangements

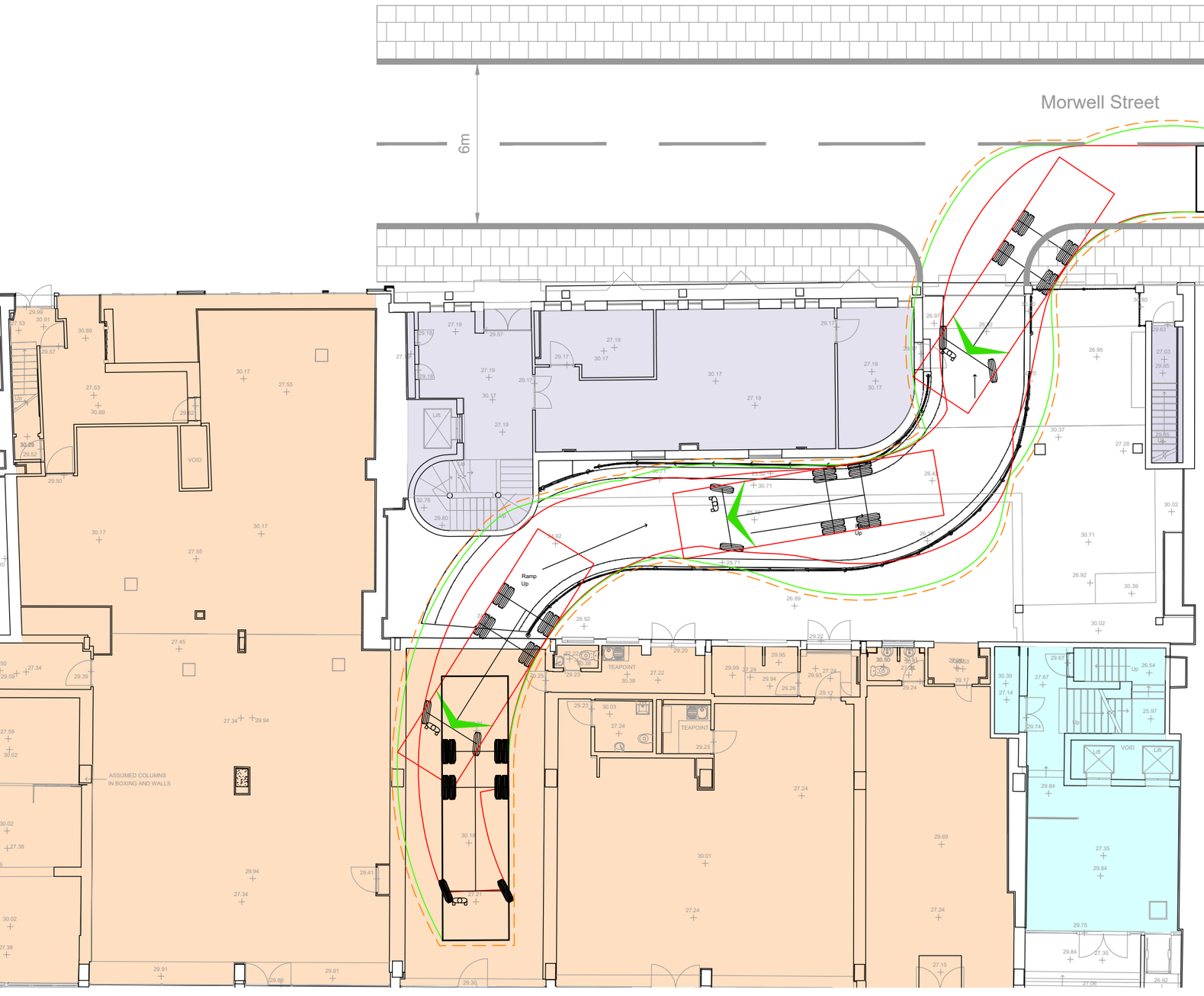
3.3.1 Waste is currently stored and processed on-site.

3.3.2 Waste is collected every 2 days. Since the existing ramp is of insufficient size to accommodate waste vehicles, waste vehicles collect waste on-street. It is understood that Facilities Management moves the bins to Morwell Street for loading prior to arrival.

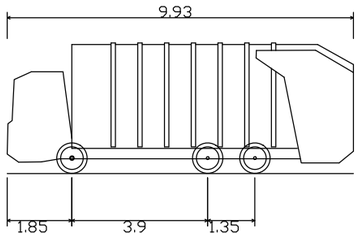
3.3.3 The existing waste generation of the site has been estimated using waste generation rates provided by the City of Westminster (2019). The total waste generated by land-use is presented in Table 3.5.

Table 3.5: Estimated Waste Generation by Land Use

Land Use	General (L)	Recyclable (L)	Food (L)	Total (L)
Office B1	1,391	2,782	464	4,637
Residential C3	180	360	60	600
Retail A1	363	363	484	1,211
Total	**1,934**	**3,505**	**1,008**	**6,448**



PROFILE



Vulture 2225 (with Mercedes Econic 2628LL 6x4 chassis)	
Overall Length	9.930m
Overall Width	2.490m
Overall Body Height	3.749m
Min Body Ground Clearance	0.302m
Track Width	2.490m
Lock to lock time	4.00s
Wall to Wall Turning Radius	9.100m

KEY

- Wheel path
- Vehicle body envelope
- Envelope at 200mm offset from vehicle body envelope
- Arrow showing direction of travel of vehicle

4. DEVELOPMENT PROPOSALS

4.1.1 This section of the report describes the development proposals.

4.2 Proposed Land Uses and Floor Areas

4.2.1 The Proposed Development seeks the demolition of the existing buildings on site and their replacement with a 5-storey above ground office-led mixed-use scheme, with the provision of retail uses on the ground level and a residential component on the upper levels.

4.2.2 For the purposes of the assessments provided within this DSP, it has been assumed that the flexible retail provision would be 80% A1 retail, 10% A3 retail and 10% D2 sui generis. The D1/B1 provision is assessed as part of Office B1 as a worst case scenario.

Table 4.1: Proposed Land Uses and Floor Areas

Land Use	NIA (m^2)*	GIA (m^2)	GEA (m^2)
Office B1	5,595	7,717	8,411
Residential C3	877	1,305	1,520
Retail A1	937	1,080	1,248
Retail A3	117	135	156
Sui Generis D2	117	135	156
Total	**8,243**	**11,028**	**12,217**

4.3 Proposed Loading Arrangements

4.3.1 It is proposed for loading activities to be undertaken at the two existing loading bays close to the Proposed Development. This would primarily be the Morwell Street loading bay, followed by the loading bay on Bayley Street. Loading bay locations are indicated on Figure 4.1 below.

4.3.2 Both the Bayley Street loading bay and the Morwell Street loading bay are located on Camden's public highway and as such are not associated with any single development. They are therefore appropriate for use by the Proposed Development at 247 Tottenham Court Road.

4.3.3 It is noted that the site would contravene LB Camden's policy recommending on-site loading for major developments. However, this policy requirement to provide off-street loading bay facilities is considered to be outweighed by LB Camden's policy requirements and the West End Scheme's objectives to protect and enhance the retail provision on Tottenham Court Road and maximise active frontages on Morwell Street, in order to reduce the impacts of anti-social behaviour.

4.3.4 The provision of an on-site loading area would only be feasible with a ramp or vehicle lifts to the basement levels. Both of these options have been investigated, and it was found that significant ground floor areas would be consumed to facilitate the required infrastructure, detrimentally affecting the provision of ground level retail floor space and activation on

Morwell Street, which is core tenet of the scheme proposals, and has been well-received at pre-application meetings.

4.3.5 Furthermore, the provision of an off-street loading area at grade would require loading vehicles to reverse over the footway, which creates a detrimental pedestrian and cyclist experience, as well as impacting on pedestrian and cyclist safety on Morwell Street.

4.3.6 Since the impacts of off-street loading are considered to be disproportionate to the benefits of providing a loading bay on-site, the existing arrangement of on-street loading activities to occur on Bayley Street and Morwell Street is seen as appropriate considering the scale of the development.

LOADING BAY ON MORWELL STREET

4.3.7 There is an existing loading bay on Morwell Street is located on the western side of Morwell Street south of the proposed development. It was delivered as part of work associated with the new development at 1 Bedford Avenue (planning reference 2013/3880/P).

4.3.8 The 1 Bedford Avenue application forecast a total of 16 daily vehicle trips associated with deliveries and servicing for that site. There is, as such, likely to be a reasonable level of excess capacity within this loading bay on Morwell Street (though of course, given it is on public highway the loading bay may be used by others).

4.3.9 We have applied an in-house assumption that 13% of delivery vehicles would arrive in the busiest hour. Table 4.2 below shows the forecast number of peak hour delivery vehicles for both the 247 Tottenham Court Road and 1 Bedford Avenue developments.

Table 4.2: Forecast Peak Hour Delivery & Servicing Vehicles (rounded up)

Development	Cars	MGVs	HVGs (rigid)	Total
1 Bedford Avenue + 247 TCR	4	1	1	5*
Total	4	1	1	5
Dwell Time	10 mins	15 mins	20 mins	

** Rounding error*

4.3.10 We consider that within the Morwell Street loading bay there is capacity to accommodate almost all the delivery vehicles associated with 1 Bedford Avenue and 247 Tottenham Court Road in the peak hour. In cases where vehicles arrive at the same time, delivery vehicles would utilise the loading bay on Bayley Street.

4.3.11 The Morwell Street loading bay is 12m in length, so could comfortably accommodate two cars at any one time, or a panel van and a car simultaneously.

LOADING BAY ON BAYLEY STREET

4.3.12 The existing loading bay on Bayley Street is located on the northern footway immediately outside of Gail's Bakery and opposite the northern edge of the Proposed Development's façade.

4.3.13 We understand from discussions on 28th September 2020 with LB Camden's WEP team that the loading bay on Bayley Street, delivered as part of the West End Project, is designed to facilitate delivery vehicles for commercial and retail uses on and around Tottenham Court Road. Its use would therefore be appropriate for the proposed development at 247 Tottenham Court Road.

4.3.14 In the creation of this loading bay, an assessment of demand is assumed to have been prepared by LB Camden's WEP team. This assessment of demand is likely to have incorporated delivery and servicing vehicles for the existing site at 247 Tottenham Court Road. The development proposals incorporate a very minor increase in delivery vehicle trips per day, with no forecast increase in peak hour delivery vehicle numbers on the existing site.

4.3.15 It is therefore considered that the Bayley Street loading bay may have sufficient capacity alone for the 247 Tottenham Court Road delivery and servicing vehicles.

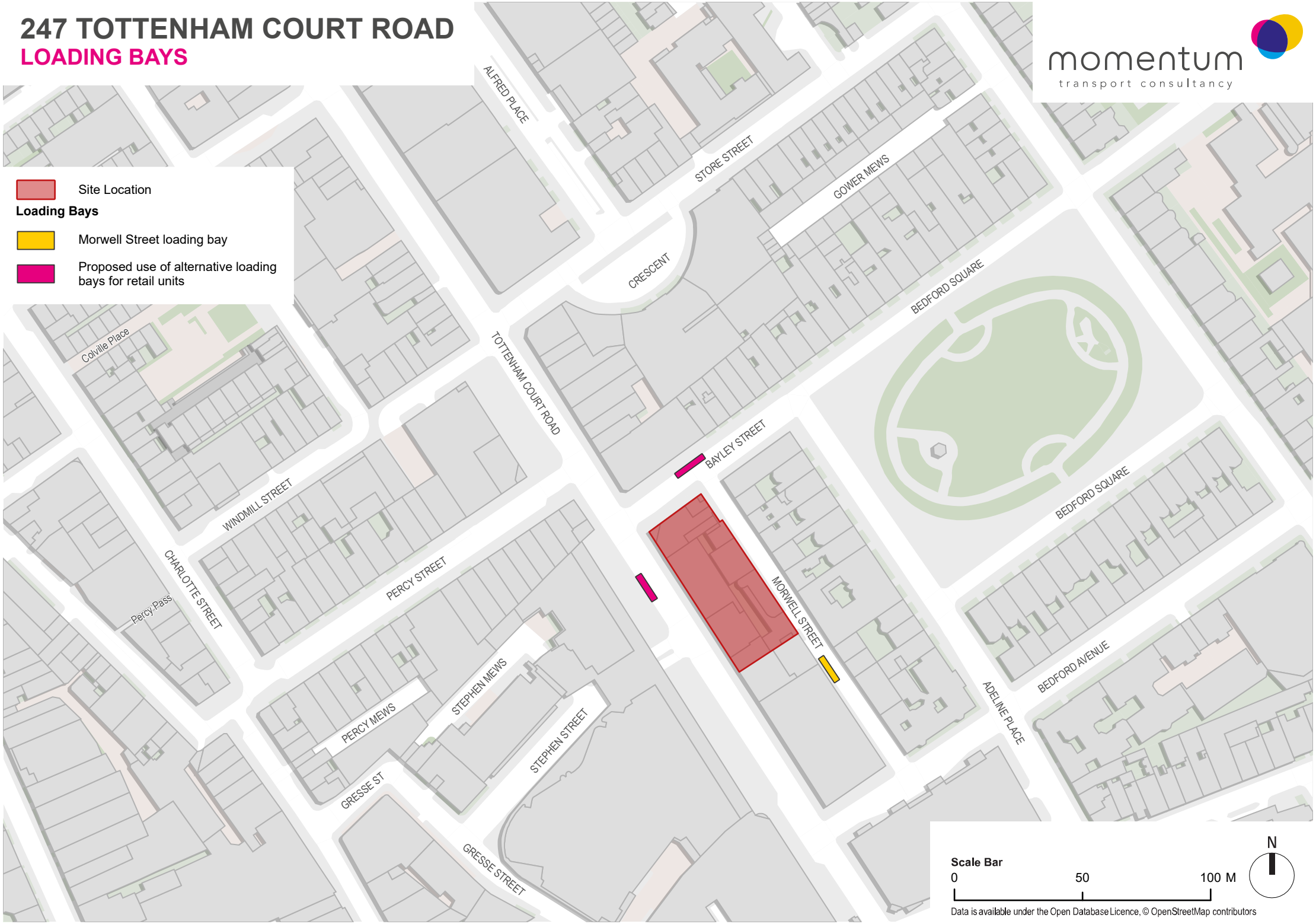
LOADING BAY ON TOTTENHAM COURT ROAD

4.3.16 There is a loading bay opposite the Site on Tottenham Court Road. It is proposed that Unit 4, which would become a lock up unit because of tenant operational requirements, could be serviced from this loading bay as it is nearest to Unit 4.

4.3.17 The proposed delivery and servicing strategy is described in the following section of this report.

247 TOTTENHAM COURT ROAD
LOADING BAYS

momentum
transport consultancy



5. PROPOSED DELIVERY AND SERVICING STRATEGY

5.1 Introduction

5.1.1 This section of the report sets out the intended delivery and servicing strategy for the Proposed Development, as well as the forecast delivery and servicing trips for the building, including a breakdown of the daily and peak hour trips.

5.2 Access Strategy

PROPOSED DELIVERY STRATEGY

5.2.1 Deliveries and services associated with the Proposed Development would primarily be dependent on the Morwell Street loading bay, followed by the Bayley Street loading bay.

5.2.2 For the Morwell Street loading bay, vehicles would approach from the south and park in the loading bay. For the Bayley Street loading bay, vehicles would come via Morwell Street or Bedford Square.

5.2.3 Loading activities would then occur, with goods transported between the vehicle and the site.

Servicing hours

5.2.4 Servicing hours for the site would be limited to between 08:30 and 18:30 for the Morwell Street loading bay, in line with permitted loading hours in this location

5.2.5 In the absence of time restrictions on the Bayley Street loading bay, it has been assumed that deliveries should occur here between 08:00 and 20:00 in accordance with the Camden Local Plan.

5.2.6 Vehicles would then egress from the Morwell Street loading bay and travel north. Vehicles from both loading bays would then travel eastbound on Bayley Street, to access the surrounding highway network via Bedford Square.

Unit 4

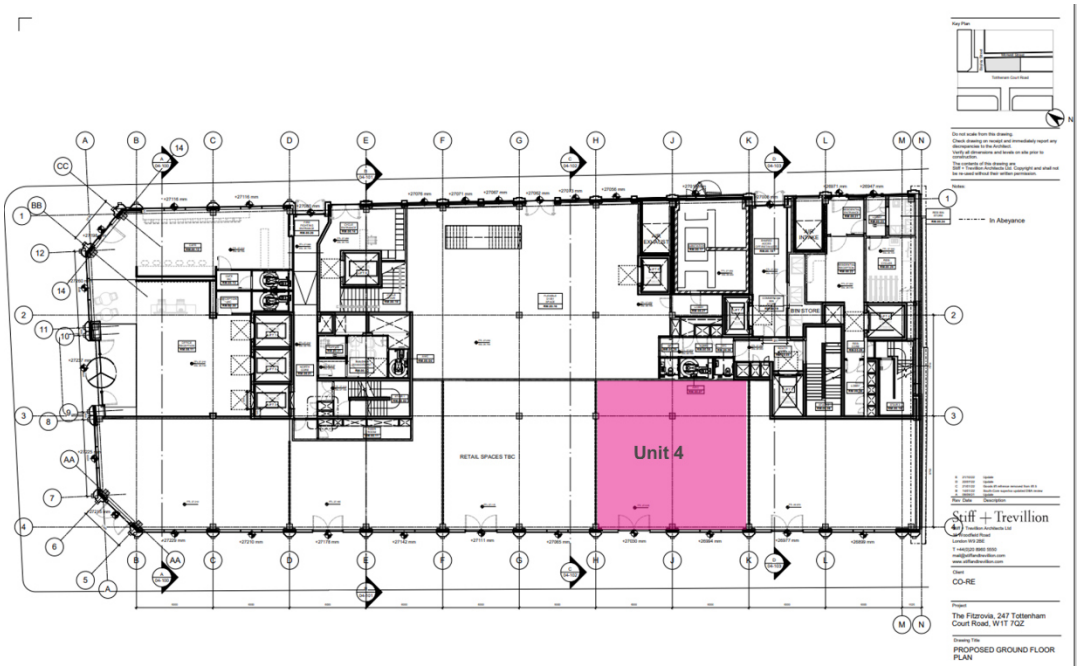
5.2.7 Tenant operational requirements at 247 Tottenham Court Road – The Fitzrovia mean that Unit 4 (Figure 5.1 below) located on Tottenham Court Road would be a “lock up” unit and would not have access to the internal servicing route to and from the Morwell Street on-street loading bay. It is proposed that retail unit 4 is serviced through the front door and uses the existing loading bays on Tottenham Court Road and Bayley Street, which are nearer to their shop unit. Loading bay locations are indicated in Figure 4.1.

5.2.8 As noted above, deliveries to the Bayley Street loading bay would occur between 08:00-20:00 in line with the Camden Local Plan.

5.2.9 Some sections of Tottenham Court Road are restricted to buses and cycles only between Monday and Saturday 08:00 – 19:00. These restrictions do not apply to the loading bay on Tottenham Court Road directly opposite the site. Therefore, deliveries via the Tottenham Court Road loading bay would not be subject to timed restrictions. However, since Tottenham Court Road is a busy route at peak times, and there is no crossing at this location

to reach the Site, it is proposed that deliveries made to this loading bay would be made outside peak hours for pedestrian and vehicular traffic (8:00-10:00, 12:00-14:00, 16:00-19:00 Monday to Friday).

Figure 5.1: Unit 4 Location



5.2.10 Other servicing arrangements would remain as set out above.

5.2.11 The permitted hours for deliveries and loading are summarised in Table 5.1.

Table 5.1: Permitted Loading Bay Hours

Loading Bay	Deliveries Permitted During Following Hours
Morwell Street	08:30 – 18:30
Bayley Street	08:00 – 20:00
Tottenham Court Road	Anytime

5.3 Delivery and Servicing Trips

DELIVERY AND SERVICING TRIP RATES

5.3.1 The number of delivery and servicing vehicle trips attracted to the development have been estimated using servicing trip generation rates based on a delivery and servicing database which combines survey information from developments across Central London. The forecast vehicle trips have been calculated using the proposed floor areas and the trip rates derived from that database.

5.3.2 Table 5.2 shows the vehicle trip rates used to estimate the delivery and servicing trips and the percentage of trips anticipated to arrive during the peak hour.

Table 5.2: Delivery and Servicing Trip Rates

Land Use	Daily Servicing Trip Rate	Peak Hour %
Office B1	0.21 per 100m^2 NIA	10%
Residential C3	0.10 per 100m^2 NIA	5%
Retail A1	0.59 per 100m^2 NIA	15%
Retail A3	2.00 per 100m^2 NIA	17%
Sui Generis D2	0.15 per 100m^2 NIA	8%

**differences may occur due to rounding*

FORECAST DELIVERY AND SERVICING TRIPS

5.3.3 Table 5.3 presents the forecast delivery and servicing trip rates using the trip rates included in Table 5.2 and the proposed floor areas presented in Table 4.1.

Table 5.3: Forecast Delivery and Servicing Trips

Land Use	Daily Servicing Trips	Peak Hour Trips
Office B1	12	1
Residential C3	1	0
Retail A1	5	1
Retail A3	2	1
Sui Generis D2	1	0
Total	**21**	**3**

**Differences may occur due to rounding*

NET DELIVERY AND SERVICING TRIPS

5.3.4 The Proposed Development would result in an uplift of two delivery and servicing trip per day, and no additional servicing trip in the peak hour.

5.3.5 The delivery and servicing trips associated with the Proposed Development would thus have a negligible impact on the surrounding road network.

VEHICLE TYPES

5.3.6 The vehicle type percentage splits associated with each land use of the Proposed Development are indicated in Table 5.4.

Table 5.4: Proposed Development Vehicle Split Assumptions

Land Use	Cars/Vans <7.5T	MGVs	HGVs (Rigid)
Office B1	75%	18%	7%
Residential C3	80%	17%	3%
Retail A1	65%	22%	13%
Retail A3	85%	10%	5%
Sui Generis D2	80%	15%	5%

5.3.7 The forecast delivery and servicing trips for the Proposed Development detailed by vehicle type are shown in Table 5.5.

Table 5.5: Proposed Development Trips by Vehicle Type

Vehicle Type	Number Per Day	Number in Peak Hour
Cars/Vans <7.5T	15	2
MGV	4	1
HGV (Rigid)	2	0
Total	**21**	**3**

5.3.8 It is assumed that the dwell times for cars and vans would be 10 minutes, for MGVs it would be 15 minutes and for HGVs it would be 20 minutes. Consequently, the provision of one loading bay is considered to provide adequate capacity for the forecasted delivery and servicing trips associated with the Proposed Development.

6. WASTE MANAGEMENT STRATEGY

6.1 Future Waste Requirements

6.1.1 The waste generated by the Proposed Development has been estimated in line with the City of Westminster advice contained within the City of Westminster Recycling and Waste Storage Requirements (2019), which is considered to be best practice.

6.1.2 The storage provision is based on a 2-day collection of uncompacted waste.

6.1.3 The waste generation forecasts for 247 Tottenham Court Road are summarised in litres in Table 6.1.

Table 6.1: Waste Generation for 247 Tottenham Court Road

Land Use	General (L)	Recyclables (L)	Food (L)	Total (L)
Office B1	5,047	10,093	1,682	16,822
Residential C3	120	240	40	400
Retail A1	1,310	1,310	1,747	4,368
Retail A3	164	164	218	546
Sui Generis D2	94	187	31	312
Total	**7,170**	**12,866**	**3,864**	**23,900**

6.2 Waste Strategy

6.2.1 Specific waste storage areas for waste generated by the residential, office and retail land uses would be provided.

6.2.2 Residents would be required to dispose of their waste in the residential waste storage area on the ground floor level.

6.2.3 The retail waste storage area would be located on the ground floor level.

6.2.4 Waste generated by the office land uses would be located on basement level 1. The basement facilities would be accessible via a service lift within the Proposed Development. From the lift, waste would be transferred to the main waste processing rooms and storage bins. It would be the responsibility of the individual office tenants to collect their waste and move it to the basement storage area.

6.2.5 The Facilities Management would be responsible for bringing the waste bins up from the waste bin storage areas to the on-street loading bay where the waste vehicles would park. Waste stored on basement level 1 would be moved to the ground floor via the goods lift.

6.2.6 The areas would be capable of accommodating the required number and types of bins as set out in Table 6.2.

Table 6.2: Bins Required for all Land Uses

Bin Type	Capacity (L)	General	Recyclable	Food	Total
Eurobin	1,100	2	3	-	**5**
Wheeled Bin	660	2	2	-	**4**
Wheeled Bin	360	1	1	-	**2**
Wheeled Bin	240	-	-	7	**8**

UNIT 4

6.2.7 As mentioned previously, tenant operational requirements mean that Unit 4 located on Tottenham Court Road would be a “lock up” unit and would not have access to the internal servicing route to and from the Morwell Street on-street loading bay. It is proposed that retail unit 4 is serviced through the front door and uses the existing loading bays on Tottenham Court Road and Bayley Street, which are nearer to their shop unit.

6.2.8 A ‘waste bags on street’ arrangement would be in place for Unit 4.

6.2.9 An existing waste contractor will be used for collection of this waste so as to not generate additional waste vehicles.

7. DSP IMPLEMENTATION

7.1 Introduction

7.1.1 This section of the Framework DSP sets out some of the measures that should be taken by the applicant and future tenants of the application site to minimise the impact of delivery and servicing associated with the scheme.

7.2 Proposed Measures

7.2.1 Table 7.1 outlines the DSP measures, the benefits they offer, implementation and time scales, and allocated responsibilities for taking them forward to encourage sustainable freight. The measures aim to achieve DSP objectives given in Chapter 1 and minimise the impact of future delivery and servicing vehicles trips forecast for the Proposed Development.

7.2.2 The DSP measures will require further consideration once information regarding occupiers of the development is obtained. At this stage it is anticipated that during its development the DSP will consider a combination of the measures outlined in Table 7.1.

7.3 Management of the DSP

7.3.1 Following completion of the development, the DSP would be implemented prior to commencement of operations. The Applicant would work with the delivery and servicing suppliers to ensure that the DSP is implemented successfully with a view to achieving ongoing improvements in sustainable practices.

7.3.2 The Travel Plan and DSP are interlinked and therefore the management of both strategy documents would form part of the same role for the Travel Plan Coordinator.

7.4 Raising Awareness

7.4.1 To ensure that the DSP is effective, staff would need to be made aware of the DSP strategy, including the following:

- What the DSP is
- Benefits of implementing the DSP
- What they can do to improve the DSP
- How service vehicle movements impact on the local community and transport networks

7.4.2 In addition, staff and supplier training would assist in reducing the vehicle movements to and from the Site and should help to avoid congestion on the local roads.

7.4.3 Staff will also be required to undertake surveys which will inform the management team about the vehicle movements to and from the site and will help them provide inputs towards the development of the DSP.

Table 7.1: DSP Measures

Measure	Description	Benefit	Timescale	Responsibility
Management of the DSP				
Adoption of the DSP	Involvement of Facilities Management / Tenants at the earliest stage is important to ensure that the DSP is active and a living document	More policies can be implemented, and better results delivered	Upon occupation	Applicant
Assign responsibility of the DSP to the Travel Plan Coordinator (TPC)	TPC to be responsible for managing the ongoing development, delivery and promotion of the DSP	To ensure that the DSP is taken forward and delivered	Upon occupation	Facilities Management / Tenants
iTRACE/TRAVL compliant surveys	Surveys of all servicing and delivery movements occurring throughout a typical weekday (connected to booking schedule)	To inform the future development of the DSP and to quantify progress	One year after occupation	TPC
Raise awareness and promote DSP initiatives	Provide site information and promote the DSP to tenants, facilities management and other key stakeholders	To promote the measures and targets of the DSP to a wide audience	Upon occupation and ongoing	TPC
Training of staff	All staff associated with the delivery and servicing of the development be required to undertake appropriate training	To ensure staff are aware of and understand the measures of the DSP in order to implement them effectively	Upon occupation	TPC
Tenant awareness	Ensure all tenants are made aware of the DSP and its requirements upon	To ensure all tenants are aware of the DSP and its likely implications	Prior to tenant occupation	Landlord / Facilities Management

	entering tenancy agreement			
Reducing Delivery and Servicing Trips				
Access routes for servicing and deliveries	Provide sufficient space for servicing vehicles to access and deliver to site	To minimise the impact of the development on the public highway	To be implemented with design measures	Design team
Reducing Delivery and Servicing Trips				
Use of local resources / suppliers	Encourage the relevant purchasing departments and tenants to source items locally or from the same supplier where possible	To reduce the number of delivery vehicle trips to the development	Within one year of occupation	TPC
Exploration of possible consolidation strategy	Possibility to reduce the number of delivery vehicles substantially through consolidating deliveries to the development and undertake deliveries outside of peak hours where possible	To minimise the impact of the development on the public highway	Upon occupation and ongoing	TPC / Facilities Management / Tenants
Last mile solutions	Encourage further use of last mile solutions such as cargo bikes to reduce the number of delivery vehicles	To reduce the number of delivery vehicle trips to the development	Upon occupation and ongoing	TPC / Facilities Management / Tenants
Delivery and Servicing Operations				
Site information	Produce information booklets showing suppliers delivery and servicing facilities, access	To avoid any confusion regarding access, process, and to encourage deliveries to	Upon occupation	TPC

	arrangements and management procedures	occur outside of peak hours where possible		
Freight Operator Recognition Scheme (FORS)	Use of suppliers who are FORS members and encourage non-FORS members to sign up to the scheme	Benefits towards driver behaviour training, fleet management, safety and reduced emissions	Within six months of occupation and ongoing	TPC
Delivery booking system	Ensure all suppliers are signed up to delivery booking and ANPR system to effectively manage loading bay capacities and avoid disruption to local highway network	To improve the efficiency of the loading bays and to reduce the risk of vehicles conflict over capacity	Within one year of occupation	TPC

7.5 Review and Monitoring

7.5.1 The DSP would be reviewed and monitored at regular intervals to measure performance and identify improvements where possible.

7.5.2 The first stage of this process would be to undertake a detailed vehicle survey for all delivery and service vehicles coming to the site during the first 6 months of occupation, or after 75% of the site is occupied.

7.5.3 The surveys would be based on TfL guidelines and would include questions regarding the frequency of visits; vehicle type; supplier information; type of goods/material delivered; capacity of vehicle used; frequency of deliveries arriving outside delivery slots; quantity and size; access; and arrival and departure routes.

7.5.4 Following implementation of the DSP, it should remain a live document to be continuously monitored and updated. This would be the responsibility of the Travel Plan Coordinator.

7.5.5 The continued review and monitoring programme for the DSP is shown in Table 7.2.

Table 7.2: Continual Review & Monitoring Programme

Action	Timescale
Servicing and Delivery Vehicles Survey	Within 6 months from the site's initial occupation or after 75% of the site occupancy
Produce and Implement the DSP	Upon occupancy
Future surveys to update the DSP	1st and 2nd year
Feedback to the Management Company regarding the servicing and delivery arrangement and other related issues	Quarterly following the first meetings between the occupiers and the management company
Strategic review of the DSP	Within 6 months of the occupation, and after 1st and 2nd year.

8. CONCLUSION

8.1.1 This DSP outlines the intended delivery and servicing strategy for the Development at 247 Tottenham Court Road. The strategy has been prepared in full consideration of current national, regional and local transport policy relating to delivery and servicing arrangements at Proposed Development sites in the LB Camden.

8.1.2 The Proposed Development is expected to generate a negligible net increase in daily and peak hour delivery and servicing trips. The net impact of the delivery and servicing trips generated by the Proposed Development would be negligible.

8.1.3 It is proposed for loading activities to be undertaken at the two existing loading bays close to the Proposed Development, on Bayley Street and Morwell Street. It is proposed that retail unit 4 is serviced through the front door and uses the existing loading bays on Tottenham Court Road and Bayley Street, which are nearer to their shop unit.

8.1.4 The proposed delivery, servicing and waste management strategies have been detailed within this document including the forecast delivery trips associated with the development.

8.1.5 A set of initial measures and potential targets have been set out within this DSP which would be further developed upon occupation of the site and through reviews by the application with any tenants or occupiers.

8.1.6 The implementation of this DSP would adequately mitigate any impacts of the forecast servicing movements of the Proposed Development. It is anticipated that a Detailed DSP would be secured through a Section 106 Agreement.