Comments on 2024/4662/P – Related to the revised servicing strategy

Summary

This application proposes a **substantial change** in the servicing strategy for the 1 Museum Street development. The servicing arrangements approved when the application was granted were already borderline and the new proposal is simply **not feasible**. The NPPF requires that applications for development should 'allow for the efficient delivery of goods.'[1] **This proposal does not achieve this.**

The covering letter to the application states that this is an 'improved servicing strategy'. This is most definitely not the case.

The only feasible servicing strategy for this development give the change in bay capacity proposed is to require, by condition, that delivery consolidation is implemented to ensure that no more than 40 deliveries are made to the site each day. Whilst this has an operational cost it is necessary to comply with the requirements of Camden's Local Plan and with the NPPF.

Detailed Discussion

The primary change proposed is the removal of the 2 basement loading bays (and associated lift) in the basement of the 1 Museum Street bock and the substitution of a single turntable bay at street level. Servicing of West Central Street and High Holborn units remains unchanged but the servicing of the Vine Street units would no longer take place from the basement of 1 Museum Street but will be required to take place from the same locations as for the other 2 blocks.

We made clear in our comments to the original application that we believed that the proposal was not feasible. The basement bay was proposed, on Arup's figures, to be 75% utilised. We disagreed both with the capacity figure and the demand figure that generated this number, demand should be assumed to be higher and actual capacity should be assumed to be lower.

Poor journey time reliability in London means that any proposal which assumes the capacity of a loading bay will be more than 75% utilised will not have sufficient spare capacity. We believed that this was the case here. This means that vehicles will arrive for their booked slot and find a vehicle that arrived late is occupying the bay. As there is no room for a waiting vehicle to park up it will have to drive around before returning to the site.

The application was granted despite these concerns but it was made clear that the servicing arrangements should be reviewed.

1 Museum Street Bay – Capacity Utilisation

The DSP now proposes that there will be a **single** surface bay for 1 Museum Street. This will be used only for the 1 Museum Street tower. The 8 daily deliveries for the Vine Lane units are now proposed to take place from the other loading areas on Grape Street and Museum Street.

The 1 Museum Street loading area will be utilised, on Arup's demand and capacity figures, **91%** of the time compared to 75% for the original proposal which was already borderline. In order to achieve even this figure the bay must now be used from 06:00 – 22:00 every day, a period of 16 hours. Previously the bay was used from 07:00-16:00, so the time period has been increased by 70%.

Planning for a capacity utilisation of 91% means it is quite simply **not feasible**. It will only take one late delivery to result in a significant number of vehicles not being able to use their planned delivery slots. They will then either have to circulate in the area or make their deliveries from other locations. This will have a significant impact on efficiency and so contravene the requirements of the NPPF

[1] NPPF (12/24) 117 (d)

stated above. If those vehicles stop in illegal locations (which is quite likely) this will have a significant impact on the road network and on safety.

It is worth noting that the capacity figures used by Arup in their calculation assume that 80% of deliveries to this bay are by 3.5T LGV and only 20% are by 7.5T MGV. They assume no HGV deliveries. This assumption is not made explicit in the DSMP. We have had to derive it by a reverse calculation from Figure 5. Given that this is a **critical assumption** in the proposal we are concerned that there is no justification provided for this figure. If the proportion is instead 70/30 then by Arup's calculations 96% of capacity will be used, and even worse position that that proposed.

We have set out our calculations for demand and capacity in Tables 1 and 2 attached.

Actual Demand

In making the demand assumptions Arup state that they have assumed that *'Flexible Ground Floor Uses (E excluding part E(g) use) and Flexible Ground Floor Uses (unrestricted Use Class E) are 50% food retail and 50% nonfood'*. This is an important assumption because food retail requires 350% more deliveries per 100m^2 GIA than office or non-food retail. As with our previous submission we believe that this is not a reasonable assumption. Class E is a flexible use and there is no reason to expect that **any** of the units will end up being in non-food retail use. The same assumption was made for the St. Giles Court development (2005/0259/P) and yet **all** of the ground floor units are now in Class E food use. With retail suffering all over Central London it is not credible to make an assumption that 50% of the Class E units will remain in non-food retail use. The demand assumptions should be on the basis of a reasonable worst case scenario (as was used by Arup in their September 2022 submission). If Arup's assumption do not turn out to be correct then even more deliveries will need to made and delivery issues, and efficiency, will be even worse.

If we calculate the use of the 1 Museum Street Bay assuming all of the flexible class E use is food then the bay will be used 94% of the time. Even less feasible than the 91% assumed by Arup.

Other Bays

The DSMP assumes that deliveries to other parts of the development will be made from a loading bay on Grape Street and from an inset Double Yellow Line (DYL) area on Museum Street. It is assumed that these bays will used from 06:00-22:00 despite the fact that they are in close proximity to residents and use at these times will have a negative impact on their amenity. This is **1 hour earlier** and **3 hours later** than was assumed in the previous DSMP. This significant change is not noted in the DSMP or the covering letter to this application.

In our submission for the original application we made the point that no attempt had been made to measure the actual **current** utilisation of either bay.

The Grape Street bay is the only loading bay available to service all the businesses in Princes Circus, most of which are food businesses. Our observations show that this bay is already heavily used and there is no evidence that there is any significant spare capacity.

The inset DYL area on Museum Street (which is NOT marked as a loading bay) is used mainly by PHVs and taxis waiting to pick up people leaving the Post Building. In future it will no doubt be used in the same way for 1 Museum Street as there are no other waiting locations available. It is already heavily used.

The assumption within this DSMP is that these bays have the capacity available to receive **21 deliveries per day**. This is 50% more than previously assumed. It is 30% of the deliveries required by the whole development.

We know that 80% of all deliveries in the West End are made between 07:00 and 14:00. Assuming that this is also true for these deliveries then there will be 17 deliveries to the on street bays in this period. Assuming the same (unjustified) assumption of an 80:20 LGV/MGV split in vehicle type as assumed for 1 Museum Street and without allowing any additional time for the distribution to and within buildings the average time per delivery is 17 minutes. This means that the new development will use **30% of the capacity** of these bays in this period. This is a significant proportion of their total capacity and we believe is very likely to exceed their available capacity for the reasons set out above.

The DSMP states that 'Due to the low number of deliveries utilising the on-street loading areas, there will not be a booking system'. We **do not agree** that 21 deliveries and 30% of capacity is a 'low number of deliveries.' Putting in place a booking system will not be possible because the bays are used by a range of businesses that are not within the development.

The proposal to make the deliveries for the Vine Lane units to these bays, in addition to those previously proposed, is simply **not feasible**.

Policy Position

Arup point out that Local Plan Policy T4 requires that developments over 2,500sqm are expected to accommodate goods vehicles on-site. The whole development has an area more than **11 times** larger than this. Even if we exclude the Tower at 1 Museum Street the remainder of the development is over 5,000 sqm and so the requirement of T4 still applies. The revised DSMP does not acknowledge this and by adding the 8 deliveries, and the waste collections, for Vine Lane to the total makes the situation worse.

As well as Policy T4 Camden's Policy A1 (Managing the Impact of Development) covers servicing requirements. The explanatory notes state that:

To avoid congestion and protect residential amenity, developments will be expected to provide on-site servicing facilities wherever possible.

We see no reason why this development should not be **required** to provide all the servicing facilities on-site. To put 30% of the servicing demand onto existing bays that are already heavily used by other buildings does not comply with Camden's requirements and will make deliveries to the development inefficient. This is another away in which the proposal does not comply with the requirements of the NPPF.

This is why we repeat our position that loading capacity **within the development** needs to be provided to comply compliance with Policies A1 and T4.

Proposed Solutions

The **capacity** of the loading facilities in the development have been reduced below the level at which it can be operated efficiently and feasibly based on the assumptions of vehicle mix and dwell time that have been used. The solutions are to reduce the dwell time to increase capacity and to consolidate deliveries in order to reduce demand.

Increasing Capacity

Adding bays is one approach but this is clearly not the direction being followed. The other approach to increase capacity is to reduce the dwell time (the time the vehicle needs to stay in the bay). The most effective way to do this is to separate the unloading process (taking goods off the vehicle) from the process of delivering the goods to their destination in the development. This can be done by requiring that the delivery process is managed by the facilities management team and not by the driver. In our discussions with Arup it was implied that this was the intention for deliveries to the 1 Museum Street bay but this is not made explicit in the DSMP. **This needs to be a clear requirement for all the deliveries being made to the development.** This should **include** any that are delivered to the on-

street bays. It can be seen in Figures 6-12 that the process of making deliveries from the on-street bays is complex and will take a significant time. This will means that the dwell time for making these deliveries may be rather longer than that assumed in Arup's calculations. It would be easy enough for vehicles coming to these bays to be given instructions to contact the FM team when they are approaching the area in order to ensure that the FM team is available at the on-street bay to accept the delivery and take it to its destination.

Reducing Demand

The other solution that should be implemented is to **require** that the applicant reduces demand by implementing delivery reduction measures to keep the number of deliveries to below 75% of the available capacity of the single loading bay they intend to provide. They can provide space for 54 deliveries so the feasible number is 75% of this, or 40 deliveries per day for the whole site compared to the estimated 70 deliveries estimated by Arup (we believe the figure should be assumed to be 76).

Arup have set out in section 2.5 of the DSMP some options to reduce delivery numbers. However they have omitted the option of delivery consolidation. This is already being used in the City of London for developments where there is not the capacity to have the full number of deliveries that a development would generate actually coming to the building. 22 Bishopsgate (which is referenced in the DSMP) is one of the developments using this approach. Consolidation requires that some of the deliveries to the development are instead to a nominated location away from the site and delivered by a vehicle that makes the trip to the site several times a day. This allows a significant reduction in the number of vehicles that are required to deliver to the site itself and so reduces the demand on the loading facilities. There is an ongoing operational cost associated with this but it is required if there is insufficient capacity to make all of the required deliveries.

This is an application of the Agent of Change principle. The loading capacity in the vicinity of the site is already heavily used and adding a significant number of deliveries will have a negative impact on the existing businesses using this capacity. It is therefore up to the developer of this site to take the steps required to mitigate this impact.

Given the desire of the applicant to reduce capacity to a single bay for 1 Museum Street and the requirement of Policy T4 that goods vehicles for a scheme of this size are accommodated on site **requiring delivery consolidation is the only possible solution**. This will ensure that all of the deliveries for the commercial premises on the site can be accommodated using the single loading bay that is being proposed and that the site complies with Policy T4 and the Ganet of Change principle.

Waste Management

The previous version of the DSMP assumed that waste for the Museum Street/Vine Lane part of the development would be handled within the basement waste store and that commercial waste from the units in the West Central Street/High Holborn part of the development will be put out on the highway for collection "immediately before the collection".

We argued that the process of putting bags on streets for collection is not appropriate for a new development such as this one. CPG Design section 8.33 is clear that **'Buildings must have off-street collection areas at ground level'**. These are not just storage areas. They are areas which waste collection operatives enter to remove waste.

The new proposal is even worse than the previous one. The waste for the Vine Lane units is now intended to be collected from the street outside in contravention of the requirements of CPG Design 8.33. This is a new, purpose built development and we see no reason why the development cannot adhere to the CPG requirement.

We believe that the appropriate solution is that the Facilities Management team is responsible for collecting waste from **all** of the commercial units in the development and consolidating it for collection in the basement waste store in 1 Museum Street. This will remove the need for waste to be left outside the units on West Central Street and Vine Lane. Waste from the residential units can be managed via the 3 communal waste stores as already proposed.

Table 1 – Demand for Deliveries

		ARUP Table 3 (Oct 24)				CGCA Calculation (Dec 24)			
Building	**Use**	**Use**	**GIA**	**Trip Rate**	**Arup Table**	**Use**	**GIA**	**Trip Rate**	**Trips**
Museum Street	E (Office)	E (Office)	22796	0.18	42	E (Office)	22650	0.18	41
	E (Non-Food)	E (Non-Food)	259.5	0.52	2				
	E (Food)	E (Food)	259.5	1.8	5	E (Food)	519	1.8	10
Sub Total					49				51
	E (Office)								
Vine Lane	E (Food)	E (Food)	160	1.8	3	E (Food)	320	1.8	6
	E (Non-Food)	E (Non-Food)	160	0.52	1				
	C3	C3	1579	0.07	2	C3	1579	0.07	2
Sub Total					6				8
High Holborn	E (Food)	E (Food)	12	1.8	1	E (Food)	24	1.8	1
	E (Non-Food)	E (Non-Food)	12	0.52	1				
	C3	C3	426	0.07	1	C3	426	0.07	1
Sub Total					3				2
West Central Street	E (Food)	E (Food)	346	1.8	8	E (Food)	692	1.8	13
	E (Non-Food)	E (Non-Food)	346	0.52	2	E (Non-Food)			
	C3	C3	1987	0.07	2	C3	1978	0.07	2
Sub Total					12				15
Total					**70**				**76**

Table 2 – Capacity for Deliveries

Delivery Demand vs Capacity - Museum Street Bay

	Turnround Time	Lift Cycle Time	In Building Logistics	Total	Assumed Split
LGV	15			15	80%
MGV	25			25	20%
HGV	30			30	0%
Average Total Time				**17**	**Minutes**

Bay Capacity

No. of Bays	1
Operating Hours	16
Operating Minutes	960
Capacity in Minutes	960

Delivery Capacity		56	Vehicles per day
Assumed Waste Collections		2	per day
Remaining Capacity		54	Deliveries per day

				% of Capacity
Assumed Demand	**ARUP**		**49**	**91%**
	Objectors		**51**	**94%**