

Enirayetan, Oluwaseyi

From: Moran, Kathryn
Sent: 21 September 2015 14:51
To: Planning
Subject: FW: Planning Application 2015/4774/P - Camden Market and Dead Dogs Basin

Kathryn Moran
Senior Planning Officer

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From: Richard Horne CBOA [mailto:r.horne@cboa.org.uk]
Sent: 21 September 2015 14:51
To: Moran, Kathryn
Cc: d.lowe
Subject: Planning Application 2015/4774/P - Camden Market and Dead Dogs Basin

Dear Ms. Moran,

The Commercial Boat Operators Association (CBOA) represents operators of freight carrying vessels in the UK's inland and estuarial waterways and is accepted by the Government as the representative industry body.

The CBOA has an interest in promoting use of the River Thames and London's canals and basins for carriage of freight by barge, to relieve road congestion and reduce exhaust emissions. This is particularly relevant where movement of materials is proposed for developments that are adjacent or near to waterways. This is in line with Government proposals for assisting reduction of road congestion in London. (See GPG 2122 - Planning for Freight on Inland Waterways [www.aina.org.uk/docs/Planning4freight\(1\).pdf](http://www.aina.org.uk/docs/Planning4freight(1).pdf), and also the London Plan <http://www.london.gov.uk/priorities/planning/london-plan>; the latter as a good example of use of the 'Blue Ribbon Network' of navigable waterways for freight). Leeds, Tower Hamlets and Greenwich are examples whose local authorities are keen on freight use of waterways in this way.

CBOA wishes to provide comment on the above planning application, in two ways:-

- a) for more definite commitment to the use of the canal for carrying freight during the reconstruction phase
- b) for proposed use of Dead Dogs Basin for freight, with a wharf access.

a) Canal Freight during construction

Camden is in a very built up area and would significantly benefit from not putting extra lorry traffic on the roads from the construction proposed. The site borders the canal and so there is no reason why canal transport for a large part of the construction materials and excavation materials cannot be used. Canal transport uses significantly less fuel and consequently less harmful emissions are produced, and is a much safer mode of transport.

In the Planning Application, reference the Mayor's Transport Strategy (MTS), Policy 9 on page 65, the third bullet point says "Access for deliveries and servicing maximize the opportunities for sustainable freight distribution where possible." The paragraph beneath this says "The development is also located in an area of high public transport accessibility and access by walking and cycling is good. Therefore, the development complies with Policy 9 of the MTS."

Public transport accessibility, together with walking and cycling access, it does not by itself comply with the freight distribution part of the MTS.

CBOA welcomes the statement on page 66 of the Planning Application, to the effect that "In promoting the sustainable movement of freight, LBC will seek to reduce freight movement by road and encourage the movement of goods by canal, rail and bicycle to minimize the impact of freight movement on local amenity, traffic and the environment." CBOA would like to see details in the Planning Grant on how this at least some canal freight transport can be achieved, or a later study produced to this effect.

CBOA also welcomes the statement on page 67 of the Planning Application, Policy DP20 – "....Regent's Canal, which runs along the south of the site, is thought to be an economically viable route for some freight movements, notably the removal of demolition waste from the site, and LBC will expect new developments to consider using the Canal." Also on page 83, a statement on LBC policy on Regent's Canal Development - CPG7 has a specific reference to developments alongside the canal and use of canal transport for development "...Policy DP20 of the Camden Development Policies deals specifically with the use of the Regent's Canal for moving goods and materials."

CBOA would request that these policies are followed up to ensure that canal transport is properly considered and not discounted for insufficient reasons. This latter point unfortunately happens rather too often.

CBOA also notes and agrees that in The Construction and Management Plan, page 11, reference to barge transport is made. Further references to canal transport exist on pages 16, 23 and 30. CBOA requests that these are properly incorporated into the Planning Grant or that further canal transport studies are undertaken to realize these opportunities.

Use of Dead Dogs Basin for freight during operational phase

There is a considerable amount of food waste produced in the whole vicinity of the market which currently is taken away by road. This is unnecessary, as it could be removed by barge in sealed containers, using Dead Dogs Basin for loading the barges. This would eliminate many lorry movements in the locality, which is preferable. Thus, Dead Dogs Basin or part of it, should be retained as a working wharf capable of handling light to medium weight freight, which could be included in the planning application and subsequent grant.

A thesis at the University College of London (UCL) has just been completed encompassing a London canal freight project which proposes use of hydrogen fuel cell powered barge, so producing no discernible harmful emissions. A PhD project is now to follow.

This would be an ideal chance to use a very low or zero emission, safe freight transport method in the city, together with keeping many lorry movements off the roads.

If you would like any further information on any of these points I would be pleased to assist.

Yours sincerely,

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The CBOA is the prime trade organization involved in sustaining and promoting freight carriage on our waterways for economic and environmental reasons.

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