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**Your Ref** 2020/0728/P  
**Our Ref** 2007TX00

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Dear Ms Kate Henry

## **SUBMISSION OF OBJECTION ON BEHALF OF ROYAL MAIL GROUP LIMITED**

**PLANNING APPLICATION REF. 2020/0728/P) – DEVELOPMENT OF A HEALTH CARE FACILITY (D1/C2) COMPRISING BASEMENT, GROUND, PLUS FOUR STOREY AND ROOFTOP GRADES, PAVILION AND PLANT ENCLOSURE) AT FORMER CAR REPAIR CENTRE, 70-86 ROYAL COLLEGE STREET, LONDON, NW1 0TH**

On behalf of our client Royal Mail Group Limited ('Royal Mail'), Cushman and Wakefield have been instructed to submit **objection** to the proposed development of a health care facility (D1/C2) comprising basement, ground, plus four storey and rooftop pavilion and plant enclosures at 70-86 Royal College Street, London.

Royal Mail own and operate the Parcelforce Central London Local Depot immediately adjacent to the development site. The development proposes a health care facility, including bedrooms for intermediate care which would overlook the existing Parcelforce car park and service yard.

### **Background**

Under section 35 of the Postal Services Act 2011, Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. This means it is the only company to have a statutory duty to collect and deliver letters six days a week (and packets five days a week) at an affordable and geographically uniform price to every address in the UK. Royal Mail's services are regulated by Ofcom. It also operates Parcelforce Worldwide which is a parcels carrier.

Parcelforce operates a parcels collection and delivery system with 54 depots across the UK feeding 3 automated tracking and sorting hubs serving over 30,000 customers nationwide, as well as operating within an international network that can reach 99.6% of the worldwide population.

Royal Mail owns the freehold of the Central London Local Depot ('Central London LD') operated by Parcelforce, located at 24-58 Royal College Street, London, NW1 0QA immediately adjacent to the proposed development site. The depot accommodates vital postal services for London and the

rest of the country and is an important asset for Royal Mail in meeting its statutory duty to deliver a Universal Postal Service.

Royal Mail/Parcelforce is a long-established business in this location and has operated within this mixed-use area for many years. Vehicular and pedestrian access to the Parcelforce site is provided from two points, with one access point off St Pancras Way which provides access to the operational service yard, and one point of access off Royal College Street to a staff car, located directly to the east of the application site.

The proposed health care facility is of major concern for Royal Mail. The development proposes a number of bedrooms for intermediate care, requiring a greater level of amenity to residential use or standard habitable rooms, overlooking a busy and continually operational site. This proximity is likely to give rise to future amenity issues and challenges for the proposed occupiers, in particular, noise generated by activities within the yard and vehicular movements to and from the site, particularly during its early and late operational hours.

### **Planning Framework**

Paragraph 182 of the NPPF (2019) states that *“existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”*

Although this is referenced in the context of averting noise and other polluting issues, the principles can be of wider application. No such mitigation, as referred in paragraph 182 of the NPPF, has been provided in terms of the transport or parking impacts, meaning that the proposed development is contrary to the aims and objectives of this element of the NPPF.

### **Parcelforce Operation**

The Parcelforce site employs approximately 200 members of staff, with approximately 140 Royal Mail/Parcelforce vehicles and 70 private vehicles on site at any one time. The site is operational 24 hours a day, 6 days a week. Peak vehicle movements are between 0600 hours and 0930 hours and 1800 hours and midnight each day when vehicles leave or arrive at the site, both via St Pancras Way and Royal College Street. There are scheduled movements every hour from midnight until approximately 0600 hours. Peak [parcel] loading and unloading activity takes place between 1600 hours and 2200 hours and 0500 hours and 0730 hours, respectively.

Sunday hours are 0500 to 1400, recommencing at 2200 hours. This means that the site is only non-operational for a total eight-hour period in the entire week and demonstrates the continually busy and extensive nature of the Central London LD's operations.

The Parcelforce site is accessed from both St Pancras Way (primarily delivery vehicles) and Royal College Street (to the staff car park). A significant number of vehicles use the Royal College Street entrance, immediately adjacent to the development site.

On average between 11,000 and 19,000 parcels are handled/processed each day at the site, equating to between 77,000 and 133,000 parcels each week.

### **Principle of Development/ Design Context**

The application site is not allocated for redevelopment, however the LBC Site Allocations Plan (2013) does allocate other sites for health care use.

Paragraph 2.10 of the applicant's submitted Planning Statement and page 14 of the Design and Access Statement states the Parcelforce site, is allocated for residential and employment redevelopment in the LBC Site Allocations Plan (2013) "*is, therefore, likely to see redevelopment proposals in the medium-term*". The application site is not included in this allocation.

Irrespective of this, Royal Mail/Parcelforce would like to reiterate and emphasise that they currently have no plans to relocate the Central London LD from its current base and that, consequently, there is no prospect of such development coming forward.

The applicant should submit an updated Planning Statement to accurately refer to no development proposals for the Parcelforce site in the medium-long term.

The proposed massing studies within the Design and Access Statement, shows the Parcelforce site redeveloped for employment and residential uses. This is inaccurate. RMG/Parcelforce have no plans to relocate and the Design and Access Statement should be updated to reflect this.

### **Traffic and egress impact**

Whilst the submitted Transport Assessment concludes that the proposed development will result in a significant decrease in vehicular trips to the application site by comparison to the existing use (former car repair centre), traffic and access impacts created during construction of the proposed development are a concern.

The Royal Mail/Parcelforce site has two points of vehicular access, for operational vehicles from St Pancras Way, and access to the staff car park to the rear of the application site via Royal College Street. There are significant traffic flows into and out of the Parcelforce site from both of these points, and these should be protected. Any restriction or disruption to these movements that delay mail services could result in Royal Mail breaching its statutory duties, with the possibility of significant fines being levied against Royal Mail by OfCom.

The Transport Assessment has not considered the location of the Parcelforce access directly adjacent to the southern boundary of the application site close to the single access point to the proposed development. The swept path analysis provided at Appendix C shows a building directly adjacent to the south of the site, rather than a vehicular access point. This should be resubmitted with an accurate plan and accurate swept path analysis.

The Transport Assessment gives no consideration to visibility splays, and hence it is not clear if vehicles exiting the application site will have sufficient visibility to safely leave the site.

The Transport Assessment does not anticipate a significant number of servicing vehicles accessing the development site at any one time, however very limited space is available within the site for vehicles to park. The application proposes zero parking spaces on site.

The submitted Planning Statement makes reference to one new on-street disabled bay, however, does not provide any further details of this, with paragraph 4.6 stating that “*discussions with LBC on the location of this bay are ongoing*”. As a result, it is difficult to assess the impact of this in the context of the wider proposed scheme upon Parcelforce operations. No details of management are given and RMG are concerned this could lead to queuing onto Royal College Street, impeding access to the Parcelforce site.

It is not clear that the transport impacts of the proposed development can be satisfactorily accommodated within the development site.

It is essential that full assessment can be made, particularly as access from Royal College Street is key to continued operation.

A revised Transport Assessment and Planning Statement should be submitted to provide an accurate assessment of the existing highways context including visibility splays to demonstrate that egress and parking can be provided at the site, without unduly impeding the established operation of the Parcelforce site

#### Construction Impacts

The Construction Management Plan gives only limited consideration to the impact of the proposed development on operations at the Parcelforce site. No detail of how these impacts will be managed is provided.

Significantly the submitted Construction Management Plan refers to contact with Royal Mail with regard to details of the Construction Management Plan. This is not accurate. No dialogue with Royal Mail has taken place. Royal Mail/Parcelforce have very limited space available within their operational site. Both the service yard and staff car park operate at full capacity and there is no intention to provide space within either area to facilitate the proposed development, either during or after construction.

An adequate and robust Construction Management Plan, including appropriate management of any risk to Royal Mail/Parcelforce operations is essential. An updated Construction Management Plan should accurately refer to no relevant consultation between the applicant and Parcelforce.

#### **Noise Nuisance/Amenity Impacts**

Across its national estate, Royal Mail are aware of potential impact of operational noise and early morning/late evening working times on noise sensitive neighbours adjoining their operational sites. These largely result from the loading and unloading of mail, as well as vehicular movements from

the site in the early hours of the morning. The ability of Royal Mail/Parcelforce to operate outside of the normal working day is critical to their business.

Planning permission should not be granted for any use that could detrimentally impact the effective operation of an existing Royal Mail/Parcelforce operational or prejudice its ability to meet its statutory duty to collect and deliver letters six days a week to every address in the UK.

The Noise Impact Assessment submitted recognises that the Parcelforce site operates on a 24/7 basis and has taken measurement on the boundary with the Parcelforce. However, only one measurement point was used, and the dominant noise source is assumed to be Royal College Street to the west elevation of the application site. The south elevation adjoining the Parcelforce sorting yard is closest to noise intensive operations.

The development proposes 24 care bedrooms located on this boundary, directly overlooking the Parcelforce sorting yard. The Noise Impact Assessment should be updated to robust and thoroughly assess potential noise impact from the sorting yard.

The submitted assessment does not appropriately consider potential impact of activity within the yard area (loading and unloading mail) on the care bedrooms. These uses are at significant risk from operational noise and appropriate mitigation should be provided.

The NPPF is clear that the planning system should prevent both “*new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of... noise pollution*” (NPPF, Paragraph 170: e). We also reiterate paragraph 182 of the NPPF which we have referred to above.

In particular, the significant amount of noise in the early hours of the morning when the mail is delivered for the last mile sorting with Heavy Goods Vehicles (HGVs) arriving, unloading metal cages of mail for sorting before the mail is reloaded into individual vans. Hours of operation and volume of mail and traffic, increases significantly at busy times, (i.e. Christmas).

In determining the application, Camden Borough Council should recognise the importance of the existing RMG/Parcelforce site in making significant contribution to the local economy.

Responsibility should be placed on the applicant of a proposed development to adopt appropriate noise management measures, without having a detrimental impact on incumbent business operations.

The application has not provided appropriate noise testing with the application to enable the scheme to provide or adopt necessary noise mitigation measures. A detailed noise assessment should be undertaken prior to the determination of the application and where required, proposals for adequate noise mitigation measures should be submitted to and approved by the Council by way of planning condition.

## **Summary**

As outlined, additional transport and noise assessment should be provided to allow accurate consideration of the impact of the proposed development and mitigation measures necessary. The application should be updated to accurately refer to the existing RMG/Parcelforce site. A Construction Management Plan should be submitted to detail management of proposed impact on RMG/Parcelforce.

**Without these elements being resolved, our view is the application should be refused on the following grounds:**

- **Policy A1 Managing the impact of development**
- **Policy A4 Noise and vibration**
- **Policy C1 Health and wellbeing**
- **Paragraph 182, National Planning Policy Framework**

The impact of the existing Royal Mail/Parcelforce operation on the proposed care accommodation has not been appropriately or accurately tested.

Any impact on access to the Parcelforce site, particularly during construction, should be considered as part of the submission. As continued access to the site, it is imperative to Royal Mail's continued operation that this route is kept unobstructed and secured for free-flowing traffic. Any impacts upon movements along this key service route should be considered to ensure that Royal Mail's statutory duty to operate is not unduly impacted.

Further details in relation to parking to serve the development site, particularly new on-street parking should be confirmed to ensure that a full assessment of potential impacts of parking on Parcelforce operation can be made.

The NPPF is a material planning consideration which must be taken into account when determining the application.

Whilst RMG acknowledge the need for health care facilities across the London Borough of Camden, the proximity of this proposed development to an operational delivery yard with significant vehicle movements and noise generating uses during early morning and late evening times is not acceptable. The impact of the proposed use on Royal Mail/Parcelforce use has not been appropriately or accurately tested and so relevant mitigation is not in place.

The established site is an important asset for Royal Mail/Parcelforce and the local economy.

Royal Mail provide an essential postal service to local businesses and residents and continued operation should be protected to ensure statutory obligations are met.

I would be grateful if you could confirm receipt of this objection and keep me informed of any changes to the application or additional assessment submitted. If you have any queries or need to organise a site visit, please do not hesitate to contact me.



**Jason McElhoney**

Planning

For Cushman & Wakefield on behalf of Royal Mail Group Limited