
From: John Duffy
Sent: 21 June 2022 16:58
To: Matthew Dempsey
Subject: 178B Royal College St 2021/4163/P re Reasons for Refusal

Follow Up Flag: Follow up
Flag Status: Flagged

Hi Matt,

I would suggest that the following policies might constitute reasons for refusal with respect to this retrospective application:

T1 – the proposal fails to promote sustainable transport by walking and cycling as suitable means of travel to the site for customers. Whilst the OMP suggest that some deliveries will be made by cycle, it is unclear how many actually are or what proportion of deliveries this represents. The site appears to be heavily reliant on customer deliveries by mopeds and motorbikes, both of which contribute to air pollution, noise and congestion.

T2 – the number of operational parking spaces has not been justified. It is unclear whether any of the parking spaces are for staff use, or by use by other tenants of the site.

T4 – the proposed development fails to promote sustainable deliveries. As noted above, the over reliance on mopeds and motorbikes rather than cycles as a means of delivery only adds to air pollution, noise and congestion. Deliveries made to the site are generally by transit type vans rather than cargo bikes. Insufficient information has been provided on how these will be safely managed when the site marshal is not in place. No Deliver and Servicing Management Plan has been provided.

A1 – no Delivery and Servicing Management Plan has been provided to support either deliveries to the site (in terms of ingredients and cooking materials, etc) or deliveries to customers. Failure to provide such a plan is contrary to this policy.

We don't seem to have a specific policy on road safety, although it is referred to in the Camden Planning Guidance on Transport. The OMP that has been provided fails to address the objections that have been submitted in respect of road safety. Road safety concerns focus around the site's vehicular access on Randolph Street, in particular relating to vehicles entering/exiting the site at speed with passing pedestrians present and the limited amount of turning space available for delivery vans at the site entrance and within the site. Insufficient space is available within the site for vans to turn around, forcing them to exit or enter in reverse gear. Other road safety concerns relate to mopeds travelling the wrong way on Rousden Street (which is one way), travelling too fast to/from the site, and generally driving dangerously. The site management seem to have little control over how the delivery riders/drivers act or which route they take when traveling to and from the site.

I hope that's of some use.

Kind regards,

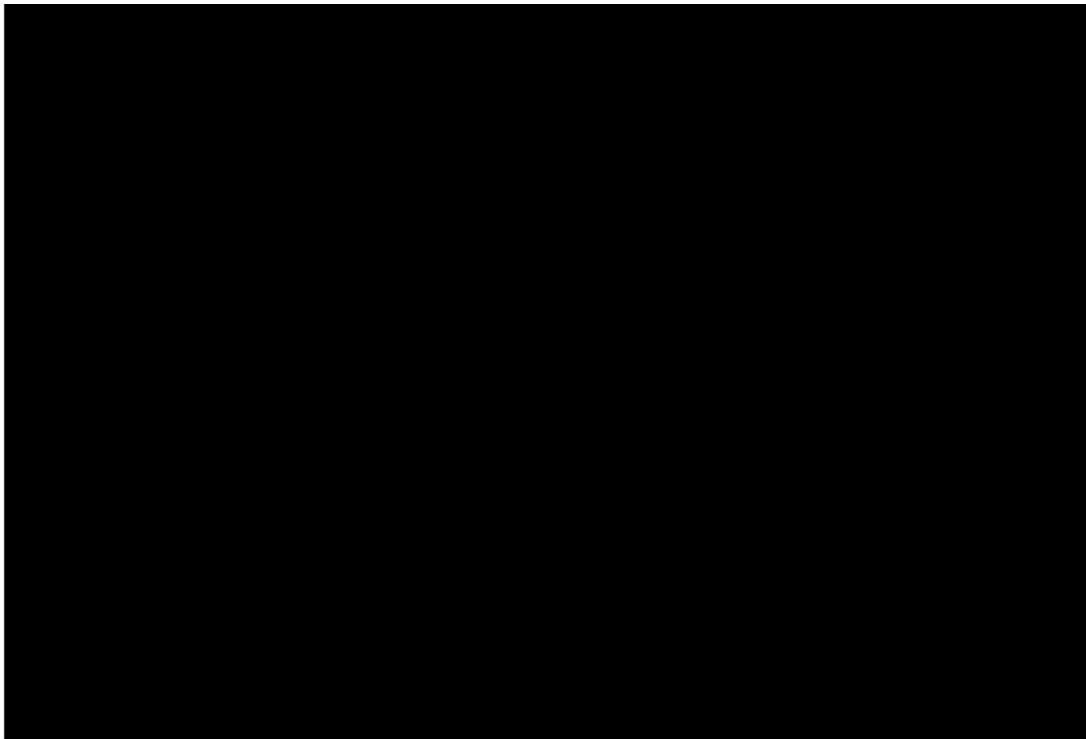
John Duffy

Transport Planner

Telephone: 020 7974 3343



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From: John Duffy <John.Duffy@camden.gov.uk>

Sent: 21 June 2022 14:28

To: Matthew Dempsey <Matthew.Dempsey@Camden.gov.uk>

Subject: 178B Royal College St 2021/4163/P

Hi Matt,

I've been off work for a prolonged period of time and am only now starting to return. I just about remember this application. Did they come back to you on any of the points that I raised ?

What other grounds are you looking to refuse on ?

Kind regards,

John Duffy
Transport Planner

Telephone: 020 7974 3343



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From: John Duffy <John.Duffy@camden.gov.uk>

Sent: 22 November 2021 17:12

To: Matthew Dempsey <Matthew.Dempsey@Camden.gov.uk>

Cc: Tatai Dewes <Tatai.Dewes@camden.gov.uk>; Steve Cardno <Steve.Cardno@camden.gov.uk>

Subject: 178B Royal College St 2021/4163/P re Cycle Stands

Hi Matt,

I forgot to say:

We don't support the use of vertical cycle racks. Can they be replaced with M-shaped or Sheffield stands ?

Kind regards,

John Duffy
Transport Planner

Telephone: 020 7974 3343



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From: John Duffy

Sent: 22 November 2021 17:04

To: Matthew Dempsey <Matthew.Dempsey@Camden.gov.uk>

Cc: Tatai Dewes <Tatai.Dewes@camden.gov.uk>; Steve Cardno <Steve.Cardno@camden.gov.uk>

Subject: 178B Royal College St 2021/4163/P re Operational Management Plan

Hi Matt,

The application description is misleading in that Arch 73 is outside of the red line boundary and presumably not used by the applicant, Jacuna.

The proposals include 16 separate kitchens (presumably producing 16 different cuisines or food products), 12 car parking spaces, 15 wall mounted cycle racks, a small area for motorcycle parking and a bin storage area. These operational areas are accessed from Randolph Street.

The Operational Management Plan (OMP) states that the premises will be operational from 8am to midnight every day of the week. The food produced will be delivered to customers via On-line Delivery Platform (ODP) riders using cycles or mopeds.

The OPM states that only 2 kitchen delivery vehicles would be on-site at any time and that there are 4 deliveries per week for the other arches. It is unclear how many of these car parking spaces are reserved for the applicant/kitchens and how many are for the other arches. This needs to be clarified. The OMP states that there would be 15 kitchen deliveries per day, Monday to Saturday, all of which would be by transit type van (equivalent to 2 per hour between 8am and 4pm). As one objector has highlighted, many of the deliveries are by refrigerated vans which keep their engines idling whilst on site, which creates a significant noise and air quality issue for neighbouring properties, particularly those on the south side of Rousden Street

The OMP states that a maximum of 30 delivery riders would be on-site at any time, which is an extremely high concentration of riders. It is unclear how many/what proportion use cycles or mopeds. More information on the numbers of riders there are, the vehicles they use and how often they arrive/depart the site needs to be provided. It is understood that the adjacent arches are occupied by companies which also use ODP riders to deliver goods, although it is unclear how many are involved or if these are the same riders which Jacuna use. This should be clarified with the applicant.

No welfare facilities for the riders appear to have been provided. It is unclear whether ODP riders are permitted to enter the Arches and hence use the 3 toilet cubicles or the office space at 178B Royal College Street. This needs to be clarified.

I note that from one of the local residents who is objecting to the proposal states that members of the public are entering the site to pick up food themselves, rather than have it delivered by an ODP rider. This is not mentioned in the OMP and needs to be addressed.

The detailed objection from the Camden Broadway Conservation Area Advisory Committee (CBCAAC) indicates that as well as Randolph Street being the main route for riders travelling

to/from the site, Rousden Street is also being used by a large number of riders. Several objectors note that some riders are travelling along Randolph Street, which is one way northeast bound, in the wrong direction. There are numerous objectors who complain about the speed of the riders, particularly on Rousden Street, and this needs to be addressed.

It is clear from the various objectors that the behaviour of the ODP riders is not being managed when they are away from the site. This needs to be addressed as a priority.

From the large number of objections, it is clear that there is a genuine concern over whether this is an appropriate location for a use which generates such high volumes of motorised traffic. Even if all ODP deliveries were undertaken by cycle, the number of riders involved is significant. This is compounded by the presence of 2 other operators at the site. If you are minded to refuse this application, then I would suggest that a transport related reason for refusal be added to the list.

I trust that this is helpful.

Kind regards,

John Duffy
Transport Planner

Telephone: 020 7974 3343

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From: Matthew Dempsey <Matthew.Dempsey@Camden.gov.uk>

Sent: 18 November 2021 11:51

To: Steve Cardno <Steve.Cardno@camden.gov.uk>

Cc: John Duffy <John.Duffy@camden.gov.uk>; Tatai Dewes <Tatai.Dewes@camden.gov.uk>

Subject: 178B Royal College St 2021/4163/P re Operational Management Plan

Dear Steve & Transport,

Please could I ask for your input and any transport comments for the planning application **2021/4163/P**

178B Royal College Street, and
Arches 73, 74 and 75
Randolph Street.
London
NW1 0SP.

"Amalgamation of 178B Royal College Street with Arches 74 and 75 and part of Arch 73 to create commercial kitchen and delivery centre with ancillary offices (sui generis). External alterations to shopfront of 178B Royal College Street and provision of plant and machinery to the rear of the Arches 73, 74 and 75. (Retrospective)."

Please see the operational management plan including details of deliveries attached. All other information is in Trim.

Apologies for the short notice, however I would be grateful if you are able to look at this asap? Any queries, please let me know? Thank you.

Kind regards,
Matt

Matthew Dempsey
Planning Officer

Telephone: 0207 974 3862



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