

Background Papers

Internal

Email, Transport Planner, 18 March 2021

Memo, Environmental Health Officer, 01 April 2021

External

Email, Martha Mundy, 01 November 2020

Email, Nigel Smith, 01 November 2020

Email, Siobhan Ward, 01 November 2020

Email, David Cox, 02 November 2020

Email, Deborah Cherry, 02 November 2020

Email, Martin Edwards, 02 November 2020

Email, Fred Rodgers, 03 November 2020

Email, Anne Corbett, 09 November 2020

Letter, Fred Rodgers, 21 March 2021

Email, Brigid Curtis, 27 March 2021

Email, Deborah Nielsen, 28 March 2021

Email, Eric Campbell, 28 March 2021

Email, Jane Carr, 28 March 2021

Email, Anna Parkinson, 29 March 2021

Email, David Cox, 29 March 2021

Letter, Lisa Scott, 29 March 2021

Email, Paul Drinkwater, 29 March 2021

Email, Tim Godsmark, 29 March 2021

Email, Tim Godsmark, 29 March 2021

Letter, Tim Godsmark, 31 March 2021

Email, Sue Pearson, 07 April 2021

Email, Transport for London, 12 April 2021

Email, Islington Council Response to delivery and service plan, 22 April 2021

Email, Islington Council Waste and Recycling consultation, 28 April 2021

Response to Public Consultation Comments, prepared by Stantec, dated March 2021

Further Consultation Responses, Prepared by Stantec, dated April 2021

Begum, Shupi

From: Martin Edwards [REDACTED]
Sent: 02 November 2020 14:47
To: Evans, Catherine; PLN - Comments
Subject: COLPAI project_17/00770/FULL_RE 20/0747 - Approval of Details pursuant to condition 44

Dear Ms Evans

I would like to object to the proposals described in the above application for discharge of planning conditions.

The Golden Lane Estate Residents Association has written to you this weekend summarising a number of reasons for objection, and I concur with these points.

I would also like to highlight the very late notification issued to residents, giving four days to comment (two of which were over a weekend).

Yours Faithfully

--

Martin Edwards
54 Basterfield House
Golden Lane Estate
London EC1Y

GOLDEN LANE ESTATE RESIDENTS' ASSOCIATION

Dear Ms Evans,

RE 200747 - Approval of Details pursuant to condition 44

On behalf of the Golden Lane Estate Residents' Association I OBJECT to the above application on the following grounds:

1.3.3 The plans seeks to achieve: *Reduce the impact of delivery and servicing activity on the residents at ColPAI as well as local residents and the environment.*

2.3.1 Highway Access Arrangements. The report identifies Golden Lane as an access point but does not indicate that Beech Street and Fortune Street have been closed to all but zero emissions traffic limiting accessibility.

2.3.2 Baltic Street West is indicated as another access point. It is noted that there is no route between Baltic Street West and East and that adjacent streets are narrow and unsuitable for 'large amounts of traffic'. Does this indicate that Baltic Street West is suitable for large amounts of traffic?

3.4.2 *Submit sufficient information detailing the delivery and servicing needs of developments, including demonstration that all likely adverse impacts have been thoroughly assessed and mitigated/prevented. This includes impact on the amenity of local residents and businesses, for example, vehicle noise impacts from idling and reversing warning mechanisms and impacts due to the size of delivery vehicles;*

Provide delivery and servicing bays whose use is strictly controlled, clearly signed and only used for the specific agreed purpose; None are proposed and it is stated that deliveries and waste removal will use double yellow lines outside the site. My understanding is that double yellow lines cannot be used for deliveries.

3.4.7 City of London waste storage requirements. There are: 35 one bed flats, 26 two bed flats, 5 three bed flats. With the requirements on the table this indicates a total residential requirement of 18,240 litres. The largest size of Euro bin is 1100 litres which means space for 17 Eurobins. This means that if the bins are emptied once a week as indicated in the document then 17 bins will need to be pulled out onto Golden Lane.

4.2.1 This states that: *At present the delivery and servicing vehicles access the site via the service road located off Golden Lane to the south of the site. This provides access to the community centre and old school buildings for refuse vehicles.* This is incorrect.

5.3.1 States that each commercial unit will have its own bin store. None are shown on the plans and the suspicion is that the waste will be stored externally in the spaces at the rear of the units where they will be unsightly and potentially smelly for the flats above.

5.4.1 This states that residents will put their refuse in the bins. This means that residents from the upper floors will have to travel down to the ground, exit the building onto Golden

Lane, walk to the north corner of the block, go through a set of locked gates, walk the length of the side of the block and put their rubbish in a bin 1.37 metres tall with a lid. This will not be practical for residents in a wheelchair and anyway residents will want to leave rubbish on the street or the Basterfield service road as this is more convenient.

5.4.3 This states that it is recommended that rubbish be collected twice a week. Will this happen? Will rubbish be collected by the City or Islington?

5.4.4 The travel distance for the bins is 22 metres whilst the refuse collectors will only travel 10 metres.

Summary

- The bin store is less than half the size needed if the bins are to be emptied once a week.
- There is no off-street parking for refuse lorries so they will have to wait on Golden Lane.
- No account has been taken of Beech Street being closed to non-zero emissions traffic. Will this mean refuse lorries being diverted down Fortune Street? Access to this street has recently also been partially closed.
- There is no indication who will collect the refuse. Clearly the City will have less control if this is Islington.
- The location of the bin store means that it will be very hard to access for disabled residents especially those in wheelchairs and difficult for everyone else. There is a risk that rubbish will be left on the street.
- The commercial units have no bin stores shown on the plans. Will the rubbish be stored in the outside areas to the rear? This will be unsightly and potentially smelly.

Yours faithfully

A black rectangular box redacting the signature of Tim Godsmark.

Tim Godsmark
Co-Chair Golden Lane Estate Residents' Association.

From:



details pursuant to condition 44

Date:

01 November 2020 13:09:07

Dear Catherine Evans

I OBJECT to the above application on the following grounds:

1.3.3 The plans seeks to achieve: Reduce the impact of delivery and servicing activity on the residents at CoLPAI as well as local residents and the environment.

2.3.1 Highway Access Arrangements. The report identifies Golden Lane as an access point but does not indicate that Beech Street and Fortune Street have been closed to all but zero emissions traffic limiting accessibility.

2.3.2 Baltic Street West is indicated as another access point. It is noted that there is no route between Baltic Street West and East and that adjacent streets are narrow and unsuitable for 'large amounts of traffic'. Does this indicate that Baltic Street West is suitable for large amounts of traffic?

3.4.2 Submit sufficient information detailing the delivery and servicing needs of developments, including demonstration that all likely adverse impacts have been thoroughly assessed and mitigated/prevented. This includes impact on the amenity of local residents and businesses, for example, vehicle noise impacts from idling and reversing warning mechanisms and impacts due to the size of delivery vehicles; Provide delivery and servicing bays whose use is strictly controlled, clearly signed and only used for the specific agreed purpose; None are proposed and it is stated that deliveries and waste removal will use double yellow lines outside the site. My understanding is that double yellow lines cannot be used for deliveries.

3.4.7 City of London waste storage requirements. There are: 35 one bed flats, 26 two bed flats, 5 three bed flats. With the requirements on the table this indicates a total residential requirement of 18,240 litres. The largest size of Euro bin is 1100 litres which means space for 17 Eurobins. This means that if the bins are emptied once a week as indicated in the document then 17 bins will need to be pulled out onto Golden Lane.

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5.3.1 States that each commercial unit will have its own bin store. None are shown on the plans and the suspicion is that the waste will be stored externally in the spaces at the rear of the units where they will be unsightly and potentially smelly for the flats above.

5.4.1 This states that residents will put their refuse in the bins. This means that residents from the upper floors will have to travel down to the ground, exit the building onto Golden Lane, walk to the north corner of the block, go through a set of locked gates, walk the length of the side of the block and put their rubbish in a bin 1.37 metres tall with a lid. This will not be practical for residents in a wheelchair and anyway residents will want to leave rubbish on the street or the Basterfield service road as this is more convenient.

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- The location of the bin store means that it will be very hard to access for disabled residents especially those in wheelchairs and difficult for everyone else. There is a risk that rubbish will be left on the street.
- The commercial units have no bin stores shown on the plans. Will the rubbish be stored in the outside areas to the rear? This will be unsightly and potentially smelly.

Yours faithfully

Siobhan Ward, Golden Lane 59 Cullum Welch House flat-owner and resident

From: [REDACTED]
Cc: [PLN - Comments](#)
Subject: Re discharge the planning conditions for COLPAI for waste collection and deliveries
Date: 01 November 2020 13:40:19

This is to register my objection to the proposed the waste element for COLPAI since it involves collecting the bins at the bottom and partly on the ramp to the north entrance of Hatfield House and this and deliveries involve vehicles making 3 point turns at the end of Baltic Street West. The waste collection for the residential block is also problematic as it involves residents having to make long journeys carrying their rubbish.

Dr Martha Mundy
1 Stanley Cohen House
Golden Lane Estate
London
EC1Y 0RL

From: [Evans, Catherine](#)
To: [DBE - PLN Support](#)
Subject: FW: RE 200747 - Approval of Details pursuant to condition 44
Date: 03 November 2020 10:12:44
Attachments: [GLERA Residential and Commercial Delivery and Servicing Plan City.pdf](#)

From: Nigel Smith <[REDACTED]>
Sent: 01 November 2020 16:16
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Subject: RE 200747 - Approval of Details pursuant to condition 44

City of London
Planning Department

Dear Ms Evans,

RE 200747 - Approval of Details pursuant to condition 44

As a resident in Basterfield House on The Golden Lane Estate I OBJECT to the above application

I am familiar with the Colpai scheme as it is immediately adjacent to Basterfield House and impinges greatly on the quality-of-life experienced by myself and fellow residents

I have perused the above application and have also had a sight of Tim Godsmark (Co-Chair Golden Lane Estate Residents' Association.) excellent and fulsome letter of objection (copy attached)

I find myself in full agreement with Mr Godsmark explanation of objections and I concur entirely with all the points he raises

I would only add that the Golden Lane Estate IS Listed Grade II, has been designated a Conservation Area and very recently English Heritage has given protected status to all the landscape and garden areas surrounding the individually listed Estate blocks

In addition to Tim Godsmark's objections therefore I would urge you to take consideration of the status of the Golden Lane Estate in the light of these extremely regrettable proposals

This application should be refused or withdrawn and the applicants perhaps requested to address the shortcomings outlined in Tim Godsmark's letter

Kind regards

Nigel Smith

[Nigel Smith](#)
[Chartered Surveyor & Chartered Architect](#)
[MSc Dip\(Arch\) FRICS RIBA](#)
[56 Basterfield House](#)
[Golden Lane Estate](#)
[London](#)

[REDACTED]
[REDACTED]
[REDACTED]



Figure 5.1: Proposed layout of residential/commercial building

From: [Evans, Catherine](#)
To: [DBE - PLN Support](#)
Subject: FW: OBJECTION COLPAI
Date: 03 November 2020 10:25:40

From: d cherry [REDACTED]
Sent: 02 November 2020 11:01
To: [REDACTED] Evans, Catherine
<Catherine.Evans@cityoflondon.gov.uk>
Subject: OBJECTION COLPAI

Dear Thomas Broomhall and Catherine Evans

I object to the following proposals. Condition 43, Condition 44 and Condition 45. As time is very limited for my objection, I list all my objections here

School waste

1. Additional traffic in Baltic Street risks accidents to pedestrians and cyclists.
2. Lack of sufficient space in Baltic Street to accommodate refuse trucks safely turning/reversing.
3. Strategic under-estimation of traffic and number of required journeys by applicant.
4. Strategic disregard to residents' concerns over the waste management proposals for the school . These concerns have been strongly made at in person and online meetings. Agreements are made by the applicant, then summarily overturned in a fresh application.
5. Unsafe proposal to temporarily place refuse bins on pedestrian and disability access to Hatfield House. This would routinely endanger resident exit in a high-risk situation (fire, gas leak) and access by emergency services and others to the flats.
6. Ramp access is required 24/7 for service vehicles to Golden Lane Estate and parking/garages, and potentially emergency vehicles. Golden Lane Estate is designed with limited vehicular access.
7. Queuing traffic in Baltic Street for access to the lower level would cause further congestion and hazards.
8. The applicant has already agreed to place refuse bins for collection on land assigned to the school.
9. Colpai should work within current approved land constraints. Leaseholder agreement is legally required for land to be assigned outwith the Estate such as the 700mm strip adjacent to Hatfield and the ramp - agreement is likely to be refused by leaseholders.

10. There seems no justifiable or practical reasons on health/safety grounds why school refuse bins are not serviced via Golden Lane. If temporarily storing the bins in the undercroft of the residential tower would give health/safety concerns, then these same concerns will also apply for the proposed application.
11. Any proposed landscaping of Baltic street should not override serious consideration for the health and safety concerns for Baltic street users.

Residential tower waste.

12. Strategic under-estimation of refuse storage space required for tower residents and for the number of required journeys by applicant. This has been ongoing by the applicant for a long time. It was admitted some time ago at an in person meeting that refuse provision and storage for the tower was inadequate, but this has not been addressed.
13. Strategic disregard to residents concerns over the waste storage and removal proposals for the residential tower. These concerns have been strongly made at in person and online meetings. Agreements are made by the applicant, then summarily overturned in a fresh application.
14. As no chutes are provided in the tower, all residents will have to exit the building and carry their refuse to the small locked storage space. The potential for bags to spill refuse en route, and for residents to chuck their bags in the public domain or on Golden Lane Estate is high. Either constitute a strong health/safety risk.
15. Refuse journeys and refuse space access for disabled/limited mobility users will be limited by the design and any potential spillages or drops along the route.
16. Creating a waste strategy that relies on someone else to clear up and clean up, with additional long-term maintenance/public health costs built in by poor design, is not acceptable.
17. No evident provision yet for refuse management for the workshops.

I will raise two further matters of concern

1. In the current pandemic - which may well continue for several years - public health and public hygiene are top issues for consideration. There is no evidence that the applicant takes public health and public hygiene matters seriously.
2. Colpai informed residents on 29 October, giving us barely a weekend to respond by today's deadline, despite the application being submitted on 2 October. The pandemic is creating challenges for all of us. Nevertheless generally agreed processes of consultation must be observed by the applicant. Shortening the response time is not acceptable.

I have taken time off work this morning to set out my objections. In return I expect from you careful consideration of and response to the matters I raise here. I also expect evidence that in the COLPAI waste management strategy health and safety concerns are being taken very seriously. Thank you.

Kind regards

Deborah Cherry

1 Hatfield House

From: [Evans, Catherine](#)
To: [DBE - PLN Support](#)
Subject: FW: Discharge of conditions app validation -delivery & servicing Objection P2020/2706, 2679 - 20/00748, 00747, cond 43,44,,46
Date: 03 November 2020 10:28:56

From: david.cox [REDACTED] <[REDACTED]>
Sent: 02 November 2020 16:14
To: [REDACTED] Evans, Catherine
<Catherine.Evans@cityoflondon.gov.uk>
Cc: [REDACTED]
Subject: Discharge of conditions app validation -delivery & servicing Objection P2020/2706, 2679 - 20/00748, 00747, cond 43,44,,46

Dear All,

I wish to object to the above servicing arrangements partly because when the Area Inspector from the London Fire Brigade inspected the service road because of the series of four serious fires in rubbish left on the service road (sufficient to cause structural damage, and followed by a criminal trial), he told me that the access to the service road was inadequate because of the limited turning circle, especially if vehicles were parked at the Baltic St entrance as they were on the day of the inspection. Has the Fire Brigade been consulted about the details of the proposals?

Initially the Inspectors Report was ignored until an enforcement notice was issued and the heaps of rubbish were then relocated, however I don't know what was agreed about the obstruction of the Baltic St entrance.

I would also add that the Basterfield road on the other side is the only fire access for that part of the Estate and anything further obstructing it would also be a serious concern.

The Estate Residents have only been given a few days notice of the proposals and may wish to get the matter checked with the Fire Brigade etc . Is some time available for this?

Yours sincerely

D W Cox. PhD MICE FGS CEng. [REDACTED] 49Basterfield Hs. 2/11/20

From: [Evans, Catherine](#)
To: [DBE - PLN Support](#)
Subject: FW: CoLPAI - P2020/2706 and P2020/2769 (LBI) and 20/00748 and 20/00747 (CoL)
Date: 03 November 2020 17:21:20

From: Frederick Rodgers <[REDACTED]>
Sent: 03 November 2020 15:28
To: thomas.broomhall@islington.gov.uk
Cc: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Subject: CoLPAI - P2020/2706 and P2020/2769 (LBI) and 20/00748 and 20/00747 (CoL)

Dear Mr Broomhall,

I have seen and read the objections which GLERA has submitted to LBI in respect of the above, as well as the similar objections which GLERA has submitted to CoL. Hence, I have copied Mrs Evans into this email.

First of all, I fully support and repeat the GLERA objections to both applications.

In addition, I have the following comments:

P2020/2769

1. I note that the application refers to “dragging” bins but, surely, these are on wheels, so wouldn’t either “pushing” or “pulling” be more appropriate and less exhausting.
2. The GLERA objection refers to Beech Street only being accessible by EVs. However, there is no access, at all, from Golden Lane into Beech Street for any vehicle, including motorcycles. Further, vehicles are only be able to use Fortune Street if either “FS1” permit holders or buses.
3. Although not the subject of this application, I understand that coaches will be used for bussing CoLPAI children to sports facilities in particular but the only possible coach parking area is that designated for delivery vehicle parking.
4. Again, not the subject of this application, the current bussing of CoLPAI children from Golden Lane to Copenhagen School reveals that parents are driving their children to the collection point and the weather is quite good at the moment. However, the pre-planning permission School Travel Plan was quite clear - if unbelievable - that no children would be carried either to or from school by private car or cab etc.
5. LBI might not have a separate waste food collection policy, whereby waste food is composted and used in agriculture but surely, this serious omission won’t be allowed to continue indefinitely. Hopefully the lack of facilities - as this proposal for a new residential development unfortunately reveals - won’t be used to prevent separate waste food collection in future.

P2020/2769

1. The problem with bins mentioned in 1 above under P2020/2706 is probably the least of concern to residents in both Hadfield House and Basterfield House. The noise from the constant movement of bins - whether dragged, pushed or pulled - as well as the opening and shutting of the bin store doors, will be a serious nuisance..

2. The need for vehicles having to execute 3-point turns could be avoided by the removal of the restriction between Baltic Street West and Baltic Street East. The closure of the junctions of both Bridgewater Street and Golden Lane with Beech Street and the restricted access to Fortune Street, suggest there is now no need for the restriction. However a "no entry" from the east at the western point of the current restriction, as well as a west - east restriction at that point to permit holders, as per Fortune Street, should benefit everyone, except, perhaps, the motorcyclists who park in the restricted area.

3. The problem with the School Travel Plan mentioned in 4 above under P2020/2706, is also applicable to this application.

4. The problem with waste food mentioned in 5 above under P2020/2706, is also applicable to this application. All the more so since it's difficult to believe that waste food will remain on site for up to a week.

5. I notice that post is anticipated to be delivered on foot but where will the postal worker park his or her van?

Best regards,

Fred Rodgers

Barbican Association stakeholder representative.

100 Breton House

Barbican

London

EC2Y 8PQ

UK



City of London Corporation: 20/00747/MDC and 20/00748/MDC
 London Borough of Islington: P2020/2679/AOD and P2020/2706/AOD
 Former Richard Cloudesley School, Golden Lane, EC1Y 0TZ

SANTEC'S RESPONSE TO PUBLIC CONSULTATION COMMENTS RE CONDITIONS 43, 44 and 46 – THE DELIVERY AND SERVICING PLAN (DSP)

FURTHER COMMENTS – Fred Rodgers

QUERY	RESPONSE
Residents' Queries	
The strategy does not take into account that Beech Street and Fortune Street have now been closed to all but zero emissions vehicle;	If vehicles are excluded from this route it will be the council's responsibility to find an alternative route. There is an alternative route via Bunhill Row and Banner Street that would mean vehicles are able to collect from Golden Lane if they are excluded from the low emission zone. Beech Street is only open west/east - east/west for ZE vehicles, which can't access Golden Lane from the south or vice versa. Fortune Street is only accessible by permit holders. These traffic restrictions enable the Baltic Street restrictions to be revisited
Concerns regarding safety of the 3 point turn on Baltic Street West and the potential safety implications of this.	Swept path analysis drawings included within the DSP show that the manoeuvre can be made by a refuse collection and delivery vehicle. The swept path analysis has been included as an appendix to this note. A banksman will also be present for all movements where a vehicle is required to reverse. Movements outside the school will be consistently monitored and reviewed to prevent any safety issues arising and to ensure the correct strategy is being implemented. This problem would be avoided if Baltic Street was opened up to allow access from the east through to Goswell Road with a "No Entry except for permitted vehicles" signs at Domingo Street and a similar "No Entry except for permitted vehicles" sign from the west at Mermel Court. The area between Domingo Street and Mermel Court would, in effect only be accessible for delivery to and collection from GLE and CoLPAI.
The status of the land beyond the back of the pavement and whether COL can use this land.	All bins will remain on COLPAI land until the time of collection. A licence will be drawn up with the academy to allow permission for bins to be wheeled across housing land but at no point will bins be left anywhere except within the boundary of the school or within the highway boundary, and for a limited period only. The appended drawing shows the location of where the bins will be stored.

	Why is the “yellow” area not at the north west corner of the site, so as to avoid any intrusion onto GLE?
Rubbish bins being left on the ramp at the north end of Hatfield House and commitment was given during consultation that the bins will be left on school land only.	As above, all bins will remain on COLPAI land until collection. They are to be stored within the land belonging to the school or within the highway boundary. The appended drawing shows the location of where the bins will be stored. See above
Concerns regarding the trip generation – current plan states ‘anticipated number’ which is considered vague. Can we provide any further evidence on how this has been calculated?	The trip generation is based on data provided by City of London and the School, using information from existing schools in the area such as the Copenhagen School in Islington. As such the trip generation represents a likely scenario for the number of deliveries to be made to a primary school in this area. This will be monitored, and trips will be consolidated to reduce the number of trips where possible. Where is the evidence of the trips to/from Copenhagen School? Are these based on the whole school or just the CoLPAI part.
Golden Lane Estate Area Association offers three options – 1. Service the building via the main entrance on Golden Lane, 2 Service the school via Baltic Street 3. Make the bollards between Baltic Street West and East demountable so that rubbish trucks do not have to reverse	As noted at the public consultation the three options have been considered, as below 1) the first option is not viable due to the need to drag bins through the playground during school hours for collection. Dragging bins to Baltic Street West also provides the shortest dragging distance. “Drag” suggests the bins don’t have wheels. Aren’t there any more sophisticated bins enabling easier manhandling? 2) The second option, to serve the school from Baltic Street West is the chosen option. It is not possible to service from Baltic Street East, as bins are required to be collected from the back of the vehicle and the narrowness of the road on Baltic Street East does not allow for a manoeuvre that would make this possible. The “drive through” facility proposed above would enable this manoeuvre. 3) this option was considered but London Borough of Islington Highways team have indicated that due to management and maintenance issues, temporary bollards is not something they would approve. See 2) above.
Further details of the amenity impacts of the proposed delivery and servicing plan.	The proposed delivery and servicing plan has been produced to limit the impacts on amenity as much as possible. All school deliveries and servicing vehicles are to operate within school hours to avoid

	<p>collections in anti-social hours. All residential delivery vehicles are encouraged to take place within the same time period, with space outside the development to allow for deliveries to be made.</p> <p>How will residential deliveries be enforced and where is this space?</p>
Concerns regarding the quantum of waste storage provided including the bin store.	<p>A total of 7 bins are included within the residential bin stores. The store has been designed to provide enough bins to support a twice weekly collection of refuse and thrice weekly collection of recycling. This is the same frequency of collection as Basterfield House.</p> <p>How does this relate to the School waste/recycling collections? How many will there be? What arrangements are there for disposing of food waste? In fact has any consideration been given to the fact that there will be food waste and it will give off putrid odours if not collected regularly, as well as spilling out of the bins?</p>
No off-street parking for refuse lorries so they have to wait on Golden Lane	<p>Refuse lorries generally collect from a kerbside location, the double yellow lines in front of the residential building allow for refuse collection and servicing but prevent waiting and parking.</p> <p>How can collection timings be synchronised with other collections and deliveries, in particular coaches serving CoLPAI? Irrespective of any protestations, coaches will be serving the school.</p>
TfL's Comments	
TfL understands delivery and servicing, including refuse will take place on street from Golden Lane on an area of double yellow lines. In line with the Intend to Publish London Plan, deliveries and servicing should be made off-street, with on-street loading bays only used where this is not possible.	<p>Due to not being able to utilise the Basterfield service road, there is no possibility of being able to service the site from an off-street location. The only other area where vehicles could park outside the carriageway would be within the undercroft access to the school. This area is to be heavily used by pupils and is therefore not appropriate for servicing vehicles. This has been the proposal since the application stage where the principal of this strategy was agreed.</p> <p>The London Plan came into effect on 02 March. If timing of collections are intended, then the undercroft could be used for waste etc collections, as pupils will not be using it at all, let alone heavily, throughout the day.</p>
All vehicles servicing and delivering to the development must only stop/unload at permitted locations and within the time periods permitted by existing on-street restrictions.	<p>Noted, this has been proposed in the DSP. Section 6.3.2 sets out how all delivery and servicing vehicles for the school will have to arrive between the hours of 10:00 and 14:00. Any vehicle not adhering to existing on-street restrictions would be subject to any penalties as per any other vehicle.</p>

	<p>The TfL comment relates to the development and not just the school.</p>
<p>TfL strongly encourages the use of a delivery booking system to provide each delivery with a specific time slot. This should take into consideration the expected number of delivery/service vehicles and their anticipated dwell times. This will allow deliveries to be managed according to the capacity of the on-street loading space and can help manage deliveries away from peak hours, minimising congestion on the local road network.</p>	<p>School deliveries will be monitored and managed as part of the DSP. All supplies will be delivered within the times stated in the DSP (10.00 – 14.00) and most regular suppliers will have a specified time slot, to avoid congestion in the same way as a delivery booking system.</p> <p>Deliveries for residents will be spread out across the whole day. Residents are likely to time any deliveries and servicing trips they have control of such as grocery deliveries, for when they are at home. This will help to encourage trips away from the peak hours. Residents can also make use of services such as Click & Collect and local collection points to help ensure deliveries are not missed. Most parcel deliveries made by van or cargo bike have very low dwell times (less than five minutes), therefore vehicle conflicts are unlikely.</p> <p>There are 66 residential units, as well as three business units, along with waste etc collection, all competing for narrow time slots. 49x5 = 4h05m, if continuous.</p>
<p>42 vehicular trips associated with the residential units and 7 for the commercial units are anticipated per day. TfL suggests the use of a Consolidation Centre where one location receives multiple deliveries from a variety of suppliers to minimise vehicle journeys to and from the site.</p>	<p>It is not considered feasible to use a dedicated consolidation centre for the site but CoL can investigate the use of a consolidation centre for the Golden Lane Estate in its entirety. However, the residents will be encouraged to choose retailers and suppliers who consolidate their deliveries. Similarly, the school, through its procurement policy, will seek to prefer suppliers that consolidate deliveries and also utilise electric vehicles or cycle logistics as part of their supply chain. CoL however will investigate whether a consolidation centre could be used as part of the wider Golden Lane Estate management.</p> <p>Access to and from Golden Lane will only be available via Old Street. Banner Street will provide access from the east and Garrett Street to the east. The 49 trips don't take into account the existing vehicles movements servicing 127 Golden Lane, 125 Golden Lane, 123 Golden Lane, UAI, GLE, The Denizen, Eglwys Jewin, The Cobalt Building, Bridgewater House, 45 Beech Street, Barbican Exhibition Halls 1 and 2, 1 Golden Lane, Barbican Estate, Golden Lane Campus, Fortune Street Park, Peabody Estate, Whitecross Street Estate West, 88 Golden Lane, 108-114 Golden Lane, 116-120 Golden Lane and 122 Golden Lane,</p>

	A possible location for a consolidation area would be in the Barbican Exhibition Hall service yard.
TfL encourages the use of freight operators with FORS silver or gold membership as it is imperative that road safety measures are considered, and preventative measures delivered through the construction and operational phases of the development.	All freight operators will be approved through City of London's usual processes which meet the necessary safety standards. It is also imperative that air and noise pollution be kept to a minimum with the use of zero emission vehicles.
TfL welcomes the applicant's commitment to arranging commercial waste collection and deliveries during off-peak hours and outside of nearby school pick up times.	Noted. Residents don't welcome this and the proposal needs revisiting. The facilities being offered to residents in the development are already substandard as regards external space and play space, so encouraging the loss of limited amenity is totally unacceptable.
CoL Comments	
Please can the applicant comment on what steps are being taken to try and minimise the commercial delivery numbers to the development.	Delivery and servicing trips are to be monitored over time and where trips can be consolidated, particularly to the school, they will be. Residents are also encouraged, through welcome packs on their arrival to the development, to use amazon locker facilities and to consolidate deliveries into one delivery rather than receiving multiple. The welcome packs were included as a measure in the Travel Plan to help encourage sustainable travel. The fact that CoL intends restricting its tenants' freedom to shop where they wish is intolerable. It's not enough to simply consider that they "will be pleased to have somewhere to live" as justification for such encouragement. Further, it's completely unacceptable to prefer Amazon ahead of its competitors.

Monitoring

City of London have committed to monitoring the impacts of the two DSPs. City of London propose that a yearly review will take place and any findings used to update the DSPs. The monitoring will include a review of the number of trips taking place and the effectiveness of the strategy in place.

Yearly reviews are unacceptable. Monitoring and response to findings must be ongoing.

21 March 2021

Fred Rodgers – 100 Breton House, EC2Y 8PQ

Begum, Shupi

From: [REDACTED]
Sent: 29 March 2021 12:48
To: PLN - Comments; Evans, Catherine; thomas.broomhall@islington.gov.uk
Subject: OBJECTIONS TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND LONDON BOROUGH OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679

Dear Ms Evans and Mr Broomhall,

Please can you find below my objections to the above Discharge of Conditions Applications. I am a resident of Hatfield House on the Golden Lane Estate and my flat is approximately 12 metres from the proposed position of the bins.

My objections are:

- Loss of amenity. The proposals park the rubbish bins for collection for an indeterminate time next to, with a gap of 1.5 metres, the entrance to Hatfield House. This will lead to smells and potentially rubbish and vermin. The proximity to the entrance has not been acknowledged in either of the documents submitted though the applicant has made the concession of not blocking the entrance, by placing the bins on the entrance access ramp, in the revised proposals. These proposals reduce the amenity of the residents of Hatfield House unacceptably especially when other options are available. The applicant is showing contempt to the residents of social housing flats, relegating the residents' entrance to their flats to a "poor door". Below is a photograph showing cut-outs of the bins in position.



- **Danger to residents of the Golden Lane Estate due to the restricted access for emergency vehicles to the Hatfield House car park ramp, the underground car parking and sports centre and the front of Hatfield House.** When servicing vehicles are parked for deliveries and turning at the end of Baltic Street West the entrance to the car park ramp will be blocked. Because of the width of the road with parking either side vehicles will not be able to pass and emergency vehicles will have to wait on Goswell Road until the street is clear for 8 to 10 minutes. This is a clear risk to life and there is no evidence that a risk assessment has been carried out and the question of whether there is one in existence has been ignored at public consultations.
- **Danger to road users and pedestrians.** Service vehicles performing 3 point turns at dead ends contravenes Transport for London policy as indicated in the response to consultation. The swept path diagrams show the vehicles in contact with the parking bays on Baltic Street West and clipping the kerbs at the entrance to the car park ramp. Baltic Street West is widely used by cyclists and motorcyclists and vehicles performing three-point turns across the road is an obvious hazard. The street is also used by pedestrians avoiding Old Street

and vehicles crossing kerbs present a danger to all road users. Coming from Old Street the road next to the bollards is a natural place to cross the road and is heavily used. Vehicles performing three-point turns in this area is a hazard and again we have no indication that a risk assessment has been carried out.

- The proposals disregard at least six delivery and servicing policies and give no good or substantial reason why.
- Despite “consultation” the applicant has refused to reconsider or modify its plans. The bins could be left at the front of the school and collected from Baltic Street East. Here the second row of bollards has always been shown on their drawings approximately 8 metres too far east. This means that while in reality there is sufficient space to park a vehicle and easily access its rear the applicants have been able to argue that there is not enough space. We have observed on many occasions similarly sized vans parking there. Despite saying in the response to consultation document that Islington Highways were objecting to dropped bollards which would mean a vehicle could drive straight through, the applicant already has permission for dropped bollards from the original permission and Islington Highways were presumably consulted on this. A gate access could also be an option if bollards are thought to be unreliable.

A better option for residents would be if servicing could be from Golden Lane. Here the street is wide enough for the vehicles not to be a traffic hazard and since Beech Street and Fortune Street have become zero carbon the road is quiet. The applicant has said that there are health and safety reasons why Golden Lane cannot be used but they have not provided evidence or risk assessments to justify this claim despite being asked.

Additionally, we believe that the bin store proposed is undersized. There is space for 5 eurobins, and four categories of waste (general waste, food waste, human waste and recycling) that have to be stored. Data from similar schools has not been provided and there is an expectation that since there is no additional space for waste storage that collection will need to be more frequent or waste will be stored externally in the space between the bin store and the fence, adjacent to Hatfield House and the allotments. The same question arises over the residential bin store where the comparisons with Golden Lane estate collection are inaccurate.

- It has been suggested by the applicant the refuse collection could “piggy-back” on the Hatfield House collections. We would note that the Hatfield House collections are in school dropping of times and the waste vehicles currently used have to reverse the length of Baltic Street West as they are too long to make a three-point turn at the end. London Borough of Islington policy only allows vehicles to reverse 25 metres and the distance from Goswell Road is well in excess of this. Baltic Street West is in the Borough of Islington.

In summary this development was designed with servicing as an afterthought and both the proposals for the school’s and the residential block’s refuse collection are unacceptable. The proposals disregard policy for deliveries and servicing. The school’s arrangements for both deliveries and waste collection are dangerous to road users who will include school children and appear to have been drawn up with a disregard to the wider community. The residential arrangements will be potentially unusable for disabled residents due to the complicated route that needs to be travelled to reach the bin store and undesirable for everyone else and will lead to fly-tipping. The loss of amenity for the users of the entrance to Hatfield House is significant and would not be acceptable if it were a private block of flats.

Regards,

Tim Godsmark BA(hons) Arch, Dipl Arch (dist), RIBA, WCCA

G O D S M A R K
A r c h i t e c t u r e
Unit 9, Shoreditch Town Hall
380 Old Street
London EC1V 9LT

tel: [REDACTED]



From: Anna Parkinson [REDACTED]
Sent: 29 March 2021 13:01
To: Evans, Catherine; PLN - Comments; Thomas.Broomhall@islington.gov.uk
Subject: OBJECTIONS TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND LONDON BOROUGH OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679 FOR THE CITY OF LONDON PRIMARY ACADEMY ISLINGTON SERVICING ARRANGEMENTS.

OBJECTIONS TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND LONDON BOROUGH OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679 FOR THE CITY OF LONDON PRIMARY ACADEMY ISLINGTON SERVICING ARRANGEMENTS.

I OBJECT to the above applications for the reasons listed below:

ROAD SAFETY:

Baltic Street West services 215 flats and maisonettes in Hatfield House and Crescent House as well as the newly refurbished office buildings on the north (Islington) side. In recent months, the number of supermarket and other deliveries by vehicle, motor scooter and bicycle has increased exponentially. Parked cars and vans line both sides of the street and vehicles are constantly manoeuvring to jockey for space.

Since the City commissioned new electric refuse vehicles to service the flats in Hatfield House, the drivers can be regularly seen reversing the full length of Baltic Street West, far in excess of the Islington maximum 25m, in order to avoid a three point turn into the vehicular ramp entrance at Hatfield. This involves around six minutes of loud hazard beeps as the lorry makes its manoeuvres.

The applicant's submitted plans have consistently indicated the existing two rows of bollards dividing Baltic Street West and Baltic Street East in the wrong position. The swept path diagram submitted with this application indicates an extremely tight manoeuvre for a 7.5 tonne truck and the reality is that this cannot be achieved with the new electric refuse vehicles already in use. I have also had sight of a Section 278 application drawing which indicates the kerb in front of the school entrance being extended into Baltic Street West which would further inhibit a large vehicle reversing into the ramp.

The applicant has stated that a banksman will supervise all vehicle turning, however this will be left to the school's commercial contractors as the applicant has now confirmed that there will not be a full time premises manager on site at the school, despite assuring attendees at an information webinar last week that there would be.

The street is well used by pedestrians, cyclists and motorcycles alike, avoiding the noisier and more polluted Old Street. The relocation of the motorcycle parking to the Islington side of Baltic Street West will not materially affect this additional rate of through traffic and may indeed increase it.

Baltic Street West is also often used as a cut through for vehicles avoiding the traffic lights at the junction of Old Street and Goswell Road.

Whatever the school's policies, there will be an increase in traffic of parents driving and dropping their children to and from school. This is evidenced by the increased number of, often illegally, parked vehicles around the current Colpai coach drop off point on Golden Lane around school run time. Late running parents are more likely to drive and coincide with the servicing vehicles.

For the above reasons I believe that the additional traffic load using Baltic Street West to service the school is unacceptable and unsafe.

The safety of road users, particularly cyclists and pedestrians, will be put at risk by the proposed additional number

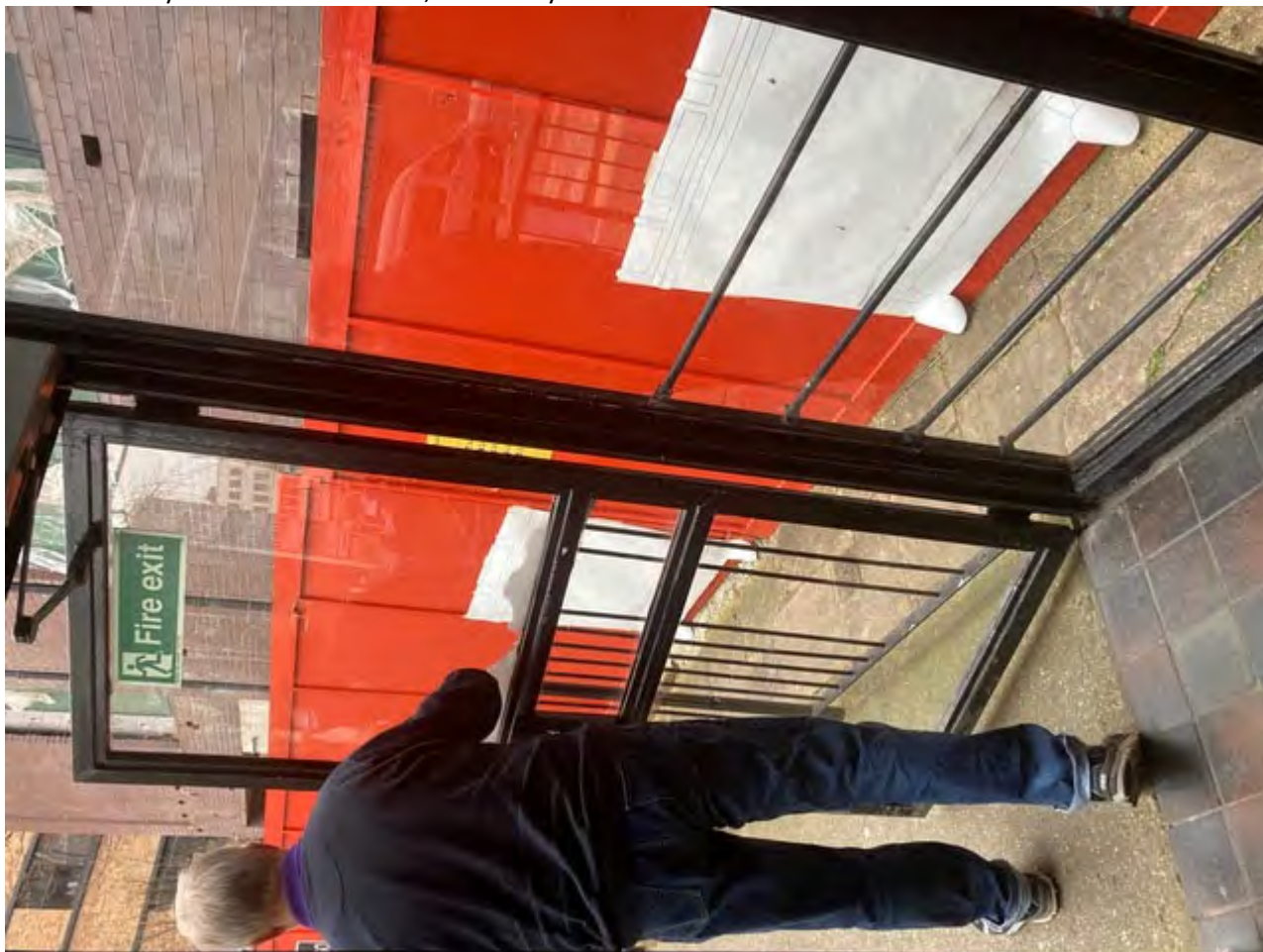
of vehicles using the entrance to Hatfield House ramp to turn and especially because larger vehicles will have to reverse the length of Baltic Street West from Goswell Road to successfully manoeuvre. The applicant's assurance that a banksman will be provided by a contractor throughout these manoeuvres relies on a commercial contract and this puts the safety of all road users at risk.

AMENITY:

Noise nuisance: In addition to the beeping refuse vehicles, the applicant is proposing that all deliveries of school food, supplies and inevitably some personal deliveries to staff will also use our front entrance ramp at Hatfield House as their service yard throughout the day.

Air Quality: The proposed additional number of vehicles turning and parking in front of residential doors and windows will have a deleterious effect on air quality, especially for the older and more vulnerable residents on the lower ground floor of Hatfield House.

Hygiene: The proposed temporary storage place for the large Eurobins from the school is right in front of the main entrance door to Hatfield House. The applicants in their March information webinar failed to confirm whether the school intends to cook fresh food on site every day or bring in food to heat up for school lunches. In either scenario, food waste will be left in bins outside the front door of 56 households. The applicant at the most recent webinar was at pains to tell us that the bins would not be stored outside our front door and in fact on school land, but as the school directly abuts our front door, the reality is this:



The applicant has failed to mention in their application how human waste from nappies and other soiled items from the nursery will be disposed of, but we assume these will be placed in bins outside the front door of Hatfield House, as there is nowhere else in the current proposals to do so.

The applicant has advised that there will be two refuse collections per week from the school, but have failed to explain how there will be distributed between general waste, food, recycling, and human waste, all requiring

different collection vehicles. If this is the case, and assuming general waste requires at least a weekly collection then recycling, food and human waste will have to be collected on a three weekly cycle. This is not acceptable in terms of temporary storage, hygiene, fire risk, smells and vermin.

The on-site premises managers at the most local two form entry primary school have confirmed that they require collections:

Three times a week for general waste and in addition:

Once a week for general recycling

Once a week for food waste

The applicant has failed to provide evidence that the school's waste strategy could be managed with two waste collections per week, and their aspiration is clearly unachievable.

Fire risk: Due to inadequate provision for storage of waste and collection, there is an increased risk of overspill and temporary arrangements for refuse and recycling storage. The applicants are unable to adequately address the question of whether the allocated bin storage area louvred doors would be protected with fire dampers and these sit in close proximity to residential properties on Golden Lane Estate. Inevitably overspill would necessitate the doors being left open to accommodate additional storage needs and left vulnerable to arson or accidental fires.

Emergency vehicle access: The application makes no consideration of the effect of the increased traffic load and manoeuvring vehicles will have on the ability of fire and ambulance services to reach the homes of the 215 households in Hatfield and Crescent House. The whole manoeuvring cycle of the current refuse collection takes some eight to ten minutes, which would cause an unacceptable additional delay to the emergency services reaching our front door.

ACCESS FOR ALL:

Our son uses a wheelchair and there are several families with young children in Hatfield House using buggies and pushchairs, as well as cyclists who chose to store their bikes in their flats or balconies and older people who find steps difficult and use the ramped entrance for level access to the lifts serving both Hatfield and Crescent House. The pedestrian ramp to our front door is the only accessible route for physically disabled residents of blocks to the north of the Golden Lane Estate. If this application is successful, we will regularly have to wait for at least the five minutes it takes for the refuse vehicles to reverse into the ramp entrance and collect the rubbish before we can get past the vehicle to our own front door. There are no dropped kerbs to enable us to cross Baltic Street West in order to reach our front door safely and conveniently. As well as this, the additional delivery vehicles the applicant proposes will use our vehicular entrance ramp as their service yard will further inhibit our free and safe use of our own front door.



At the applicant's recent information webinar, we were assured that a premises manager would be working on site at all times of the school opening. A subsequent clarification by Colpai advised that a premises manager would be not be on site full time but instead would be on site during times of the refuse collection.

The applicant has not reassured us that their management strategy is robust enough to ensure that their premises manager and the refuse collection and delivery vehicles will be able to be at the site at the same time. With London traffic and the vagaries of the refuse collection timing we do not believe this to be a workable solution which will result in large refuse bins being left outside our front door for periods of time much longer than the maximum twenty minutes stated.

Alternative proposals put forward during consultation, such as using demountable bollards to enable servicing vehicles to enter and leave the site in forward gear were dismissed as the applicant advised that the area concerned did not fall into the landscaping area of the site. However, I understand that a Section 278 application will involve remodelling the kerbs and hard landscaping of the area immediately in front of the school entrance off Baltic Street West, so this argument is redundant.

The applicant has more recently stated that Islington would not accept dropped bollards 'for numerous reasons' but fails to acknowledge that these were approved with the original planning application. They have failed to investigate alternative options, such as the gate access provided at Fann Street on the other side of Golden Lane Estate. Both of these options would allow servicing of the school by vehicles in forward gear and obviate the necessity of servicing vehicles reversing over 25m down a well used street. They would create a much safer and more neighbourly environment for the City of London's own tenants and residents in the social housing they own and manage.

Approval of this application would create numerous difficulties for existing residents, commercial properties and road users alike. It is six months before the school is due to open and the applicant remains vague on critical details of its management plans. There is little trust and confidence that due regard has been given to the amenity and

safety of the City of London's own social housing tenants and residents on Golden Lane Estate and these applications should be revised to address this.

Regards

Anna Parkinson MSc DipArch RIBA ARB

23 Hatfield House
Golden Lane Estate
EC1Y 0ST

Begum, Shupi

From: [REDACTED]
Sent: 29 March 2021 15:13
To: PLN - Comments; Evans, Catherine; thomas.broomhall@islington.gov.uk; planning@islington.gov.uk
Subject: OBJECTION TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND LONDON BOROUGH OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679
Attachments: OBJECTION to COLPAI Discharge of Servicing Plan Conditions FINAL.pdf; D001b Servicing Technical Note.pdf

Dear Ms Evans and Mr Broomhall,

Please find attached the Golden Lane Estate Residents' Association objection to the above Discharge of Conditions Applications. There are two attachments: a document setting out the reasons for the objections and a report by a leading practice of traffic engineers highlighting some of the deficiencies of the proposals and suggesting alternatives. This is referred to as Appendix 1 in the first documents and should be read in conjunction with it.

I note that there are now a number of objections to these applications. Can you confirm if they will be going to committee?

Regards,

Tim Godsmark
Co-Chair Golden Lane Estate Residents' Association
[REDACTED]

GOLDEN LANE ESTATE RESIDENTS' ASSOCIATION OBJECTIONS TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND LONDON BOROUGH OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679 FOR THE CITY OF LONDON PRIMARY ACADEMY ISLINGTON SERVICING ARRANGEMENTS.

We OBJECT to the applications above for the reasons set out below.

Timothy Godsmark BA (Hons Arch) Dipl Arch, RIBA, WCCA for and on behalf of the Golden Lane Estate Residents' Association

SUMMARY OF OBJECTIONS

- Loss of amenity. The proposals park the rubbish bins for collection for an indeterminate time next to, with a gap of 1.5 metres, the entrance to Hatfield House. This will lead to smells and potentially rubbish and vermin. The proximity to the entrance has not been acknowledged in either of the documents submitted though the applicant has made the concession of not blocking the entrance, by placing the bins on the entrance access ramp, in the revised proposals. These proposals reduce the amenity of the residents of Hatfield House unacceptably especially when other options are available. The applicant is relegating the residents' entrance to their flats to a "poor door". Below is a photograph showing cut-outs of the bins in position.



- Danger to residents of the Golden Lane Estate due to the restricted access for emergency vehicles to the Hatfield House car park ramp, the underground car parking and sports centre and the front of Hatfield House. When servicing vehicles are parked for deliveries and turning at the end of Baltic Street West the entrance to the car park ramp will be blocked. Because of the width of the road with parking either side vehicles will not be able to pass and emergency

vehicles will have to wait on Goswell Road until the street is clear for 8 to 10 minutes. This is a clear risk to life and there is no evidence that a risk assessment has been carried out and the question of whether there is one in existence has been ignored at public consultations.

- Danger to road users and pedestrians. Service vehicles performing 3 point turns at dead ends contravenes Transport for London policy as indicated in the response to consultation. The swept path diagrams show the vehicles in contact with the parking bays on Baltic Street West and clipping the kerbs at the entrance to the car park ramp. Baltic Street West is widely used by cyclists and motorcyclists and vehicles performing three-point turns across the road is an obvious hazard. The street is also used by pedestrians avoiding Old Street and vehicles crossing kerbs present a danger to all road users. Coming from Old Street the road next to the bollards is a natural place to cross the road and is heavily used. Vehicles performing three-point turns in this area is a hazard and again we have no indication that a risk assessment has been carried out.
- The proposals disregard at least six delivery and servicing policies and give no good or substantial reason why.
- Despite “consultation” the applicant has refused to reconsider or modify its plans. The bins could be left at the front of the school and collected from Baltic Street East. Here the second row of bollards has always been shown on their drawings approximately 8 metres too far east. This means that while in reality there is sufficient space to park a vehicle and easily access its rear the applicants have been able to argue that there is not enough space. We have observed on many occasions similarly sized vans parking there. Despite saying in the response to consultation document that Islington Highways were objecting to dropped bollards which would mean a vehicle could drive straight through, the applicant already has permission for dropped bollards from the original permission and Islington Highways were presumably consulted on this. A gate access could also be an option if bollards are thought to be unreliable.

A better option for residents would be if servicing could be from Golden Lane. Here the street is wide enough for the vehicles not to be a traffic hazard and since Beech Street and Fortune Street have become zero carbon the road is quiet. The applicant has said that there are health and safety reasons why Golden Lane cannot be used but they have not provided evidence or risk assessments to justify this claim despite being asked.

Additionally, we believe that the bin store proposed is undersized. There is space for 5 eurobins, and four categories of waste (general waste, food waste, human waste and recycling) that have to be stored. Data from similar schools has not been provided and there is an expectation that since there is no additional space for waste storage that collection will need to be more frequent or waste will be stored externally in the space between the bin store and the fence, adjacent to Hatfield House and the allotments. The same question arises over the residential bin store where the comparisons with Golden Lane estate collection are inaccurate.

- It has been suggested by the applicant the refuse collection could “piggy-back” on the Hatfield House collections. We would note that the Hatfield House collections are in school dropping of times and the waste vehicles currently used have to reverse the length of Baltic Street West as they are too long to make a three-point turn at the end. London Borough of Islington policy only allows vehicles to reverse 25 metres and the distance from Goswell Road is well in excess of this. Baltic Street West is in the Borough of Islington.

In summary this development was designed with servicing as an afterthought and both the proposals for the school’s and the residential block’s refuse collection are unacceptable. The proposals disregard policy for deliveries and servicing. The school’s arrangements for both deliveries and waste collection are dangerous to road users who will include school children and appear to have been drawn up with a disregard to the wider community. The residential arrangements will be potentially unusable for disabled residents and undesirable for everyone else and will lead to fly-tipping. The loss of amenity for the users of the entrance to Hatfield House is significant and would not be acceptable if it were a private block of flats.

COMMENTS ON STANTEC SCHOOL DELIVERY AND SERVICING PLAN, OCTOBER 2019

1.3.1 This DSP will therefore seek to achieve the following objectives:

Demonstrate that goods and services can be delivered, and refuse/recycling removed, in a safe, efficient and environmentally-friendly way;

The three point turn by refuse lorries and other delivery vehicles at the end of Baltic Street West is not safe as this is a through route for cycles and motorcycles and is adjacent to the ramped access to Hatfield House which is used by disabled people, people with reduced mobility and people with small children. Equally it is not environmentally friendly having vehicles reversing, turning and parking with idling engines outside a block of flats with the concurrent noise and air pollution.

2.2 Parking, Public Transport, Walking and Cycling Access

Despite mentioning parking in the title this section does not mention motor vehicle parking. In fact, there is car parking to both sides of Baltic Street West significantly reducing the width of the road.

2.3.2 Another access point to the site is available from Baltic Street West, this access is not currently in regular use but will become more open, as a result of the development proposals. The main access to Baltic Street West, is from Goswell Road. There is no through route available between Baltic Street West and Baltic Street East with the other surrounding roads being very narrow and not suitable for large amounts of traffic.

This is misleading as Baltic Street West is also narrow due to car parking and it is not possible for a refuse lorry to pass a car coming the other way.

2.4.3 Vehicular access to the site for the school aspect is from Baltic Street West. This is where deliveries and servicing will take place from, with access to bin stores available from this road.

This is misleading as access to the bin stores is available from other parts of the site and therefore from Golden Lane and Baltic Street East both of which are safer than Baltic Street West

3.4.2 The main points set out in Policy T5 are that delivery and servicing arrangements must:

Be provided off street wherever feasible, particularly for commercial developments over 200sqm GEA;

There is no off-street delivery or servicing provision.

Make optimal use of development sites;

Demonstrate that servicing and delivery vehicles can enter and exit the site in forward gear;

Refuse and delivery vehicles will have to make a potentially dangerous 3 point turn taking them over private land and extremely close to parked cars.

Submit sufficient information detailing the delivery and servicing needs of developments, including demonstration that all likely adverse impacts have been thoroughly assessed and mitigated/prevented. This includes impact on the amenity of local residents and businesses, for example, vehicle noise impacts from idling and reversing warning mechanisms and impacts due to the size of delivery vehicles;

The applicant has refused to examine or reconsider their plans despite alternatives being presented to them by residents. They have not presented any risk assessments and at a recent public meeting

ignored a question whether any had been carried out. No information has been presented about the noise impacts of vehicles reversing adjacent to Hatfield House, a block build with only single glazing, nor have they considered the loss of amenity from having rubbish bins left for collection immediately adjacent to the entrance to the block.

Provide delivery and servicing bays whose use is strictly controlled, clearly signed and only used for the specific agreed purpose;

They have not provided servicing bays.

Ensure that there are no adverse impacts on existing/proposed refuse and recycling facilities;

Golden Lane Estate refuse vehicles will not be able to access the Hatfield House bin store and the other estate underground bin stores when refuse collection and deliveries are taking place to the school as the top of the car park ramp will be blocked.

Ensure that the cumulative impact on sustainable transport modes is identified and suitably mitigated/prevented; this must include consideration of delivery and servicing requirements of existing, planned and potential development in the area, particularly in Town Centres, designated employment areas and the CAZ;

There is no acknowledgement of the impact that the use of Baltic Street West for refuse collection and deliveries will have on servicing Hatfield House and the offices on the street. When deliveries and especially refuse collection are taking place other vehicles will have to wait at the entrance to the street as they will not be able to pass further up the street. If there is more than one vehicle waiting this could lead to congestion on Goswell Road, the start of the A1.

Investigate potential for delivery and servicing by non-motorised sustainable modes, such as cargo cycles and 'clean' vehicles.

This does not appear to be part of the plans.

City of London Transport Strategy (2019)

3.4.7 General allowances of at least one metre should be provided as turning areas for refuse vehicles. They should be included in the design of access roads and gateways, etc. If vehicles are required to approach from an angle, additional allowances will be required.

There are no allowances where the refuse lorry is turning at the end of Baltic Street West and from figure 5.2 the swept path diagram shows a lorry touching the parking bays to the north of the street and clipping the kerb at the entrance to the Golden Lane Estate car park ramp. The implications of the proposed Section 278 agreement do not appear to have been taken into account.

4.2 Existing Delivery and Servicing Arrangements

4.2.1 At present the delivery and servicing vehicles access the site via the service road located off Golden Lane to the south of the site. This provides access to the community centre and old school buildings for refuse vehicles.

This section does not seem to have been up-dated from when the servicing was intended to be from Basterfield Service Road. It ignores the fact that refuse collection and other servicing for a large part of the Estate is from the car park ramp adjacent to Hatfield House. This includes deliveries to the

shops and pub on Goswell Road. This access will regularly be blocked by vehicles servicing the school.

4.2.4 Emergency service vehicles at present have access to the service road and the ability to lower the bollards at the western end to enable greater access along the service road. It is assumed that an emergency services vehicle would operate in the same way as a refuse vehicle and enter the service road in forward gear and then reverse out or make a u-turn.

Again this is only referring to the Basterfield Service Road. Emergency vehicles regularly use Baltic Street West and potentially fire engines would have to use the car park ramp which would not be possible when school service vehicles are blocking the top of the ramp.

5.2 Access Arrangements

5.2.1 Access to the school for delivery and servicing vehicles will be on Baltic Street West. This strategy will enable easy access to the location of the school bin stores and will direct all servicing work to require contact with main reception. Figure 5.1 presents the school entrance along with the proposed waste stores.

The servicing from Baltic Street West is justified because it is “easy”. This is a result of the bin store being located without consideration of the amenity of neighbours and how it might be serviced. It ignores the options of servicing from Baltic Street East or Golden Lane both of which would be better for traffic flow and for neighbour amenity.

5.2.2 As per condition 43, only 7.5 tonne box vans will be able to service the school. These vehicles are able to enter Baltic Street West in forward gear, turn outside the school using the entry to the Golden Lane estate under Hatfield House and then exit in forward gear.

This is incorrect as the van would not turn outside the school but outside Hatfield House. The refuse collection would have to be by a refuse vehicle that can lift and empty the euro bins rather than a box van.

5.2.3 In the unlikely event that multiple vehicles arrive and depart at the same time it is also possible for vehicles to wait closer to Goswell Road until the area becomes free, although, effective delivery and servicing vehicle scheduling undertaken by the facilities management team should prevent this from happening. Facilities management are also to act as a banksmen for all deliveries should vehicles arriving not provide their own.

This is incorrect as multiple vehicles are likely to use the street at one time as there are frequent refuse lorries servicing the Estate and deliveries to the Estate and surrounding offices. This is especially the case in the past year when domestic deliveries have expanded exponentially. This should have been highlighted in the Transport Assessment that formed part of the original application. Facilities management will have no control over these vehicles. We were told at the last webinar that the School would have permanent on site facilities staff but written clarifications say that there will be no on-site facilities management but that they travel between academies. They presumably will need their own parking.

5.3 Proposed Waste Collection

5.3.1 The bin store of the school will be located on the ground floor of the hall with a direct path for bins to be dragged out to street level. This location is shown in Figure 5.3 below.

5.3.2 Refuse collection will be conducted with a banksmen/ facilities management personnel present at all times. As such the refuse collection will be once per week for general waste and once every two weeks for recyclables. More information on types and frequency is presented in subsequent sections.

The submitted diagram still shows the bins being left on Golden Lane Estate land partly over the ramped access to Hatfield House and in the access path of people wanting to access the entrance to the flats. In the response to comments this has been moved in the technical note so that it is closer to the school but still straddles GLE land. We have been told that the City will grant a licence to allow this and we are taking legal advice to determine if they have the right to do so. Positioning the bins here 1.5 metres away from the entrance to Hatfield House will mean a significant loss of residential amenity and is not an acceptable solution. This proposal would be inconceivable if the block were a private development.

5.4 Delivery and Servicing Trip Generation

5.4.1 A delivery and servicing trip generation has been developed based on information provided by the headteacher of the school and the assumed number of vehicles required to service the site. The assumptions are based on information provided for other schools within Islington. Using existing data enables a strong and reliable assessment of the likely number of delivery and servicing trips the school will generate.

We have not had access to this survey information which is essential to see to establish if the frequency of trips proposed is adequate. Information received from the facilities manager at Prior Weston School which is similar in size indicates that a higher rate of trips will be necessary.

Dwell Times

5.4.5 Dwell times will vary depending on vehicle type and the type of goods being delivered or collected or the type of service being carried out. Based on previous experience, including survey work undertaken at a number of locations across central London, the average dwell time considered robust for the different collections identified above is included in Table 5.2 below.

Dwell times are dependent on the vehicle arriving at the same time as facilities managers being present and, in the case of refuse collection, the bins being in place for collection. In the real world this is unlikely to work smoothly, especially if facilities managers have to travel from other schools.

5.4.6 Delivery and servicing trips for the development as a whole has been shown to be low. When this is combined with the identified likely vehicle types and anticipated dwell times it can be demonstrated that the impact of the delivery and servicing vehicles on the area is likely to be minimal.

This is unsubstantiated conjecture and evidence from the traffic movements on the street suggest that this is unlikely to happen smoothly.

5.5 Waste and Recycling Separation and Storage

5.5.1 Waste and recycling management and storage facilities for the School were designed to meet London Plan, LBI and CoL standards. The storage areas are located on the ground floor of the Kitchen/ School Hall building and provide separation into the relevant waste streams and sufficient storage capacity for the school.

5.5.2 The bin store is designed to allow easy and safe access/ manoeuvrability to all bins. All material will be contained within the dedicated containers to avoid amenity issues associated with litter and vermin.

This is not the case as it is clear from the submitted plans that some bins need to be removed from the store to get access to others because the size of the doors does not correspond to the bin size.

5.5.3 The school facilities management team will be responsible for the management of the waste and recycling storage and servicing area. The facilities management team will move the bins from the bin store to the on-street pick up location around the scheduled pick up time to minimise the amount of time the bins

will be within the public view. The facilities management team will then act as a banksman for the turning vehicle to ensure safety for pedestrian and cyclists before returning the bins to the bin store.

Saying that the bins will be moved at “around” the pick-up time is imprecise and the bins could be next to the front door of Hatfield House for considerable lengths of time as the collection lorries may not operate to a strict timetable. Regarding the banksman, how can it be guaranteed that they will have appropriate qualifications and training for this job?

5.4.1 A delivery and servicing trip generation has been developed based on information provided by the headteacher of the school and the assumed number of vehicles required to service the site. The assumptions are based on information provided for other schools within Islington. Using existing data enables a strong and reliable assessment of the likely number of delivery and servicing trips the school will generate.

The figures for refuse collections seem to be over optimistic given the small size of the bin store, and no allowance has been made for separate collections of food waste or human waste (nappies etc from the nursery and special needs students). No data has been provided for the “survey” carried out for the delivery and collection arrangements of other schools and there is no way of knowing if they are similarly sized schools or if they have bigger bin stores.

5.4.2 The table below indicates the frequency and type of delivery and servicing trips anticipated per week and maximum expected per day.

<i>Delivery or Servicing Activity</i>	<i>Frequency</i>
<i>General Waste Collection</i>	<i>One per Week</i>
<i>Recycling Collection</i>	<i>One every Two Weeks</i>
<i>Food Deliveries</i>	<i>Once per Day</i>
<i>Post</i>	<i>Daily</i>
<i>Resources</i>	<i>Daily</i>
<i>Minimum Total per Day</i>	<i>3</i>
<i>Maximum Total per Day</i>	<i>5</i>

The language used in this section is imprecise – “anticipated” and “expected”, and if the condition were to be discharged based on this then it would be open for the School to have as many refuse collections and deliveries as it likes and not contravene the permission. There is no frequency given for food waste or human (nappy) waste. Food deliveries (plural) are given as once per day. Since the change to on site food preparation, in place of preprepared it is likely that there will be fresh meat/fish/vegetable deliveries as well as dry goods.

Five extra traffic movements per day between 10.00 and 14.00 must be the maximum. However, there is no indication of how this will be monitored

5.4.3 Table 5.1 indicates that no more than 5 trips are anticipated per day. The likelihood is that this maximum will rarely be achieved as waste and recycling collections are not carried out daily, and these collections may not occur on the same day. Additionally, all postal deliveries are likely to be made on foot. In this case, it is much more likely that delivery and servicing trips will amount to approximately 3 trips per day. As per the conditions, these trips are to occur between the hours of 10:00 and 14:00 to avoid conflict with peak hours for school pupil drop off and collection. Therefore, the impact of these trips is considered to be negligible.

While the impact of the servicing may be negligible on the school and its students it will be substantial on the residents of Hatfield House and it is unacceptable that the amenity of local residents should be ignored by this document.

5.4.4 As per the planning conditions, no vehicle larger than a 7.5 tonne box van will be used to service the site. This has been agreed with contractor Bouygues who have been appointed to service the site. Where possible these vehicles will also be electric to reduce noise and emissions. it is likely that postal deliveries will be made on foot.

The external dimension of a 7.5 tonne van is around 8100mm (long) x 2500mm (wide) x 3500mm (high). Baltic Street West where it has parking on both sides has a width of 3350mm and where there is parking on one side, a width of 5400mm. As a standard fire engine is typically 2.3 metres wide if the road were parked on both sides then a 7.5 tonne van and a fire engine would not be able to pass meaning that if a refuse vehicle were at the end of the street the fire engine would have to wait on Goswell Road until Baltic Street was clear. Similarly the distance from the bollards across the street to the entrance to the car park ramp is 4400mm and this would mean that a 8100mm refuse van parked, while collecting refuse, would block the ramp for emergency vehicles and prevent them accessing the low level of the Estate which contains the Sports Centre, car parking, recycling and servicing for the shops along Goswell Road.

5.4.5 Dwell times will vary depending on vehicle type and the type of goods being delivered or collected or the type of service being carried out. Based on previous experience, including survey work undertaken at a number of locations across central London, the average dwell time considered robust for the different collections identified above is included in Table 5.2 below.

Again no data has been given for this “survey work”: was it taken with similar buildings with similar locations and with similar operatives and facilities management? Again it does not guarantee a maximum dwell time and is imprecise.

5.4.6 Delivery and servicing trips for the development as a whole has been shown to be low. When this is combined with the identified likely vehicle types and anticipated dwell times it can be demonstrated that the impact of the delivery and servicing vehicles on the area is likely to be minimal.

The applicant has failed to show that the delivery and servicing trips would be low as they have presented no evidence to show that this is the case, just unsubstantiated figures.

5.5.1 Waste and recycling management and storage facilities for the School were designed to meet London Plan, LBI and CoL standards. The storage areas are located on the ground floor of the Kitchen/ School Hall building and provide separation into the relevant waste streams and sufficient storage capacity for the school.

No evidence has been presented that the bin store meets the required standards and the bin store size and number of bins are substantially lower than other local schools.

5.5.2 The bin store is designed to allow easy and safe access/ manoeuvrability to all bins. All material will be contained within the dedicated containers to avoid amenity issues associated with litter and vermin.

From experience of local schools, because of the unreliability of refuse collections, refuse is frequently left outside the bins when they are full. Because of the small size of the bin store refuse will have to be left outside where it will become a focus for vermin. There is already an issue with mice on the Estate and this can only get worse.

COMMENTS ON TECHNICAL NOTE, RESPONSE TO PUBLIC CONSULTATION COMMENTS

<i>The strategy does not take into account that Beech Street and Fortune Street have now been</i>	<i>If vehicles are excluded from this route it will be the council's responsibility to find an alternative route. There is an alternative route via Bunhill Row and Banner Street that would mean vehicles are able</i>
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<i>closed to all but zero emissions vehicle;</i>	<i>to collect from Golden Lane if they are excluded from the low emission zone.</i>
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This response appears to acknowledge that collections and deliveries could be made from Golden Lane which would be residents' preferred option.

<i>Concerns regarding safety of the 3 point turn on Baltic Street West and the potential safety implications of this.</i>	<i>Swept path analysis drawings included within the DSP show that the manoeuvre can be made by a refuse collection and delivery vehicle. The swept path analysis has been included as an appendix to this note. A banksman will also be present for all movements where a vehicle is required to reverse. Movements outside the school will be consistently monitored and reviewed to prevent any safety issues arising and to ensure the correct strategy is being implemented.</i>
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The response does not indicate that risk assessments have been carried out.

<i>The status of the land beyond the back of the pavement and whether COL can use this land.</i>	<i>All bins will remain on COLPAI land until the time of collection. A licence will be drawn up with the academy to allow permission for bins to be wheeled across housing land but at no point will bins be left anywhere except within the boundary of the school or within the highway boundary, and for a limited period only. The appended drawing shows the location of where the bins will be stored.</i>
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This is factually incorrect: a strip of Golden Lane Estate land is to be used by the school. It is legally questionable whether the City has a right to grant a licence to the School to use this land and The Golden Lane Estate Residents' Association is taking legal advice about this.

It should be noted that the refuse vehicles will have to use private land beyond the car park barrier on the car park ramp in front of Hatfield House but it is not mentioned whether the City will attempt to give a licence for this as well.

<i>Rubbish bins being left on the ramp at the north end of Hatfield House and commitment was given during consultation that the bins will be left on school land only.</i>	<i>As above, all bins will remain on COLPAI land until collection. They are to be stored within the land belonging to the school or within the highway boundary. The appended drawing shows the location of where the bins will be stored.</i>
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Again this is incorrect.

<i>Concerns regarding the trip generation – current plan states 'anticipated number' which is considered vague. Can we provide any further evidence on how this has been calculated?</i>	<i>The trip generation is based on data provided by City of London and the School, using information from existing schools in the area such as the Copenhagen School in Islington. As such the trip generation represents a likely scenario for the number of deliveries to be made to a primary school in this area. This will be monitored, and trips will be consolidated to reduce the number of trips where possible.</i>
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The applicant has not produced data to justify its claims. Prior Weston School locally has a larger number of trips.

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Golden Lane Estate Area Association offers three options – 1. Service the building via the main entrance on Golden Lane, 2 Service the school via Baltic Street 3. Make the bollards between Baltic Street West and East demountable so that rubbish trucks do not have to reverse	<p>As noted at the public consultation the three options have been considered, as below</p> <p>1) the first option is not viable due to the need to drag bins through the playground during school hours for collection. Dragging bins to Baltic Street West also provides the shortest dragging distance.</p> <p>2) The second option, to serve the school from Baltic Street West is the chosen option. It is not possible to service from Baltic Street East, as bins are required to be collected from the back of the vehicle and the narrowness of the road on Baltic Street East does not allow for a manoeuvre that would make this possible.</p> <p>3) this option was considered but London Borough of Islington Highways team have indicated that due to management and maintenance issues, temporary bollards is not something they would approve.</p>
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- 1) This suggests that the current proposals are simply for the convenience of the school rather than the local community. In fact the bins could be wheeled (not “dragged”) through the playground when children are in class, or after school hours to a suitable storage location in the generous school entrance area.
- 2) This objection is based on the bollards in Baltic Street East being drawn in the wrong position on the application drawings.

Further details of the amenity impacts of the proposed delivery and servicing plan.	The proposed delivery and servicing plan has been produced to limit the impacts on amenity as much as possible. All school deliveries and servicing vehicles are to operate within school hours to avoid collections in anti-social hours. All residential delivery vehicles are encouraged to take place within the same time period, with space outside the development to allow for deliveries to be made.
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For the residents of Hatfield House this proposal has the effect of maximising the impact on their amenity. The sentence “all residential delivery vehicles are encouraged to take place within the same time period, with space outside the development to allow for deliveries to be made.” This space is does not exist and it simply will not be possible for more than one collection or delivery vehicle to use Baltic Street West at a time. It is not proposed that deliveries actually be made outside the development but outside Hatfield House.

TfL understands delivery and servicing, including refuse will take place on street from Golden Lane on an area of double yellow lines. In line with the Intend to Publish London Plan, deliveries and servicing should be made off-street, with on-street loading bays only used where this is not possible.	Due to not being able to utilise the Basterfield service road, there is no possibility of being able to service the site from an off-street location. The only other area where vehicles could park outside the carriageway would be within the undercroft access to the school. This area is to be heavily used by pupils and is therefore not appropriate for servicing vehicles. This has been the proposal since the application stage where the principal of this strategy was agreed.
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The response to this comment reveals that servicing and delivery were not considered when designing this scheme but were an afterthought. Proper design does not impact the amenity of the local community nor does it mean that residents of the new housing, who may have disabilities, have

to come down from their flats, exit the building onto the street, walk up the road, round the corner of the building and through a locked gate and then through the locked doors to the bin store before they can dispose of their rubbish. This is merely facilitates fly-tipping.

With regard to the school, the Golden Lane under-croft access is only used during the school children's arrival and departure times and not between 10.00 and 14.00, the permitted servicing hours, when the main school entrance in Baltic Street will be used.

<i>All vehicles servicing and delivering to the development must only stop/unload at permitted locations and within the time periods permitted by existing on-street restrictions.</i>	<i>Noted, this has been proposed in the DSP. Section 6.3.2 sets out how all delivery and servicing vehicles for the school will have to arrive between the hours of 10:00 and 14:00. Any vehicle not adhering to existing on-street restrictions would be subject to any penalties as per any other vehicle.</i>
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It will be noted that a Section 278 notice has been issued putting double yellow lines in the area to the west of the bollards on Baltic Street West which means that vehicles should not park for deliveries and collections. It also involves extending the kerb into the road between the entrance to the ramp and the Baltic Street West row of bollards which will make it impossible to carry out a three-point turn without running over the kerb.

<i>TfL strongly encourages the use of a delivery booking system to provide each delivery with a specific time slot. This should take into consideration the expected number of delivery/service vehicles and their anticipated dwell times. This will allow deliveries to be managed according to the capacity of the on- street loading space and can help manage deliveries away from peak hours, minimising congestion on the local road network.</i>	<i>School deliveries will be monitored and managed as part of the DSP. All supplies will be delivered within the times stated in the DSP (10.00 – 14.00) and most regular suppliers will have a specified time slot, to avoid congestion in the same way as a delivery booking system.</i> <i>Deliveries for residents will be spread out across the whole day. Residents are likely to time any deliveries and servicing trips they have control of such as grocery deliveries, for when they are at home. This will help to encourage trips away from the peak hours. Residents can also make use of services such as Click & Collect and local collection points to help ensure deliveries are not missed. Most parcel deliveries made by van or cargo bike have very low dwell times (less than five minutes), therefore vehicle conflicts are unlikely.</i>
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It is not clear what the monitoring of School deliveries is for and at the last consultation the applicant was unable to answer this question.

<i>42 vehicular trips associated with the residential units and 7 for the commercial units are anticipated per day. TfL suggests the use of a Consolidation Centre where one location receives multiple deliveries from a variety of suppliers to minimise vehicle journeys to and from the site.</i>	<i>It is not considered feasible to use a dedicated consolidation centre for the site but CoL can investigate the use of a consolidation centre for the Golden Lane Estate in its entirety. However, the residents will be encouraged to choose retailers and suppliers who consolidate their deliveries. Similarly, the school, through its procurement policy, will seek to prefer suppliers that consolidate deliveries and also utilise electric vehicles or cycle logistics as part of their supply chain. CoL however will investigate whether a consolidation centre could be used as part of the wider Golden Lane Estate management.</i>
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The Golden Lane Estate was designed to facilitate servicing and has no need of a consolidation centre. Residents should not have the issues associated with this development passed off onto themselves.

<i>TfL encourages the use of freight operators with FORS silver or gold membership as it is imperative that road safety measures are considered, and preventative measures delivered through the construction and operational phases of the development.</i>	<i>All freight operators will be approved through City of London's usual processes which meet the necessary safety standards.</i>
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Will freight operators have FORS silver or gold membership? Why should they not meet TfL guidelines?

5.1 City of London have committed to monitoring the impacts of the two DSPs. City of London propose that a yearly review will take place and any findings used to update the DSPs. The monitoring will include a review of the number of trips taking place and the effectiveness of the strategy in place.

What is the point of monitoring if no one appears to know what is being monitored or how the results will be judged?

APPENDIX I – TRAFFIC ENGINEER'S REPORT.

Drawn up on behalf of the Golden Land Estate Residents' Association

Please see attached PDF file - D001b Servicing Technical Note.pdf - with a report into the proposed arrangements drawn up by Mr M Lewin CEng MICE MCIHT BSc(Hons) and Mr C Pringle BSc(Hons) MCIHT of Transport Planning Practice Ltd, 70 Cowcross Street, London EC1M 6EL

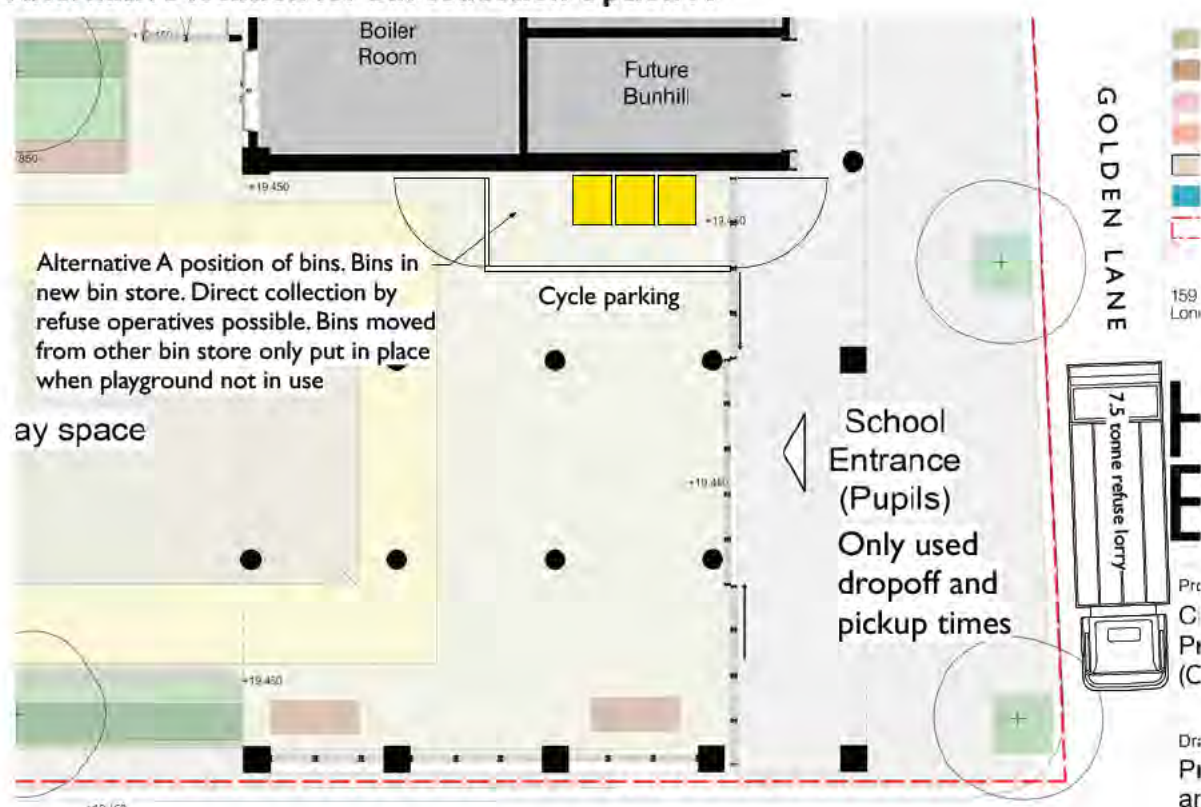
The summary of the findings are:

- It is considered that the proposed servicing and waste collection arrangements for COLPAI are well below standards, as a result of the absence of off-street servicing facilities;
- The proposed use of the car park ramp entrance hammer head, in the immediate vicinity of the school's main entrance, introduces major, negative impacts on all road users, in particular pedestrians and cyclists, which can only be mitigated by strict adherence to marshalling by banksmen; and
- It is further considered that better alternative servicing and refuse collection arrangements are possible and TPP strongly advises that these should be considered and more specifically, servicing from Baltic Street East and refuse collection from Golden Lane. This would remove the majority of the traffic conflicts identified in the report.

APPENDIX 2

Alternative locations for bin stores. These alternatives are indicated in the traffic engineer's report above. Option A is preferable for amenity and road safety. Option B allows servicing on the same side of the school but moves it wholly onto school land away from the residential entrance to Hatfield House.

Alternative location for bin collection Option A



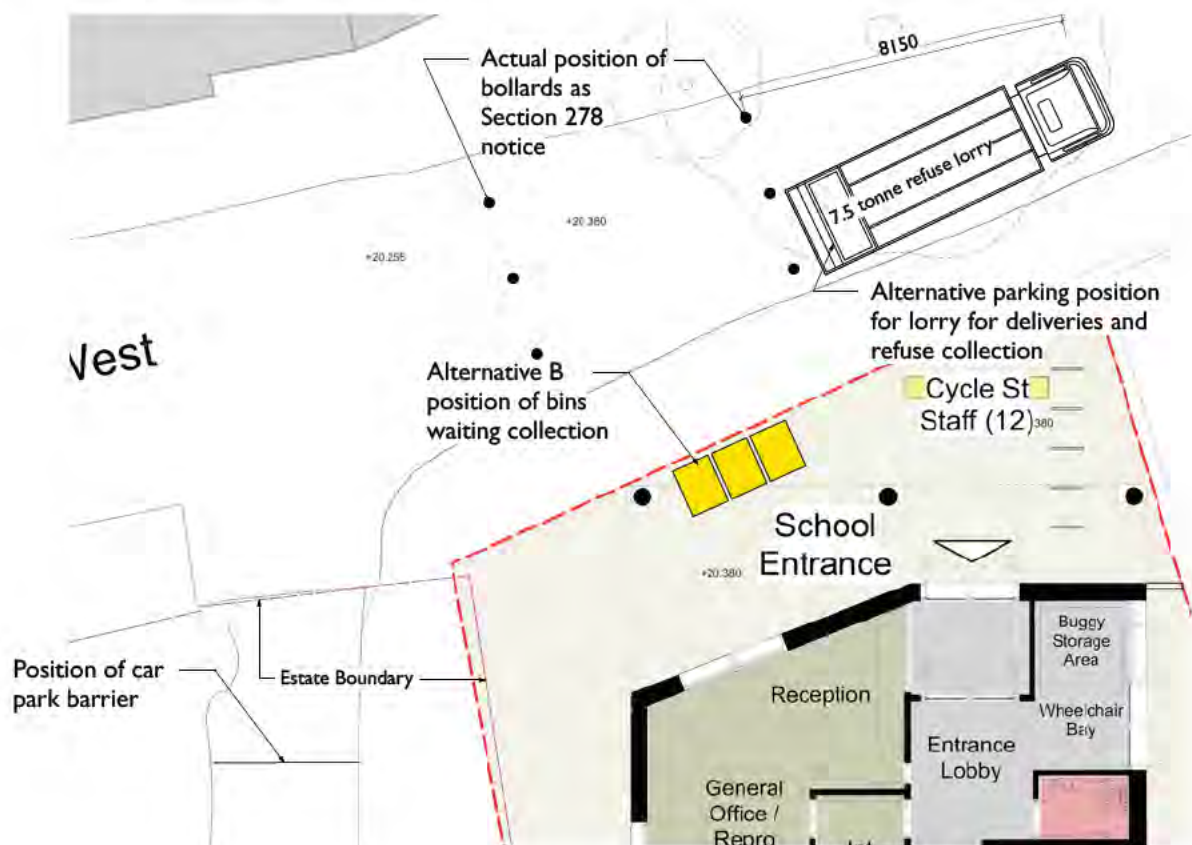
An additional bin store (likely to be required due to the under estimation of the amount of waste) is created in the generous entrance area. General waste and recycling is moved directly from the school building to this waste area. This is a slightly longer walk than the proposed walk from the school building to the bin store alongside the sports hall and kitchen. The day before food waste collection days the food waste bin(s) can be moved across the playground outside school hours to the bin store for collection and by having an extra bin an empty bin can be returned to the food waste store.

This means that the bins never have to be left outside as the bin store is within 10 m of the road. This also negates the need for a banksman as there would be no reversing.

FOR	AGAINST
No need for premises staff to take out and return bins for each type of waste.	Cleaners have a slightly longer walk to take refuse from the school building after school hours
One out of school hours movement of food waste bin across school playground	Additional bin or two are needed to ensure that there is only one weekly move of bins, i.e. one full bin taken to store one empty bin returned.
Bins collected and returned by bin men with direct access to Golden Lane	

10.-14.00 collection is when school entrance gates and access are closed	
No dangerous road manoeuvres by vehicles or danger to pedestrians and cyclists	

Alternative location for bin collection Option B



FOR	AGAINST
Deliveries and collection can be made without obstructing flow of traffic in Baltic Street East	Potential loss of parking space(s) in Domingo Street if used for waste collection
Straight access and reverse manoeuvre for vehicles without having to cross pavement	
Quiet street with few (3?) residential properties	
Bins left within School curtilage without affecting the neighbouring residents in Hatfield House	Bins collected between 10.00 and 14.00 when street is busy and when Baltic Street is the only entrance to the school.
Less danger for pedestrians and cyclists	

Baltic Street West

Servicing Technical Note - Executive summary

1. The currently proposed servicing arrangements for City of London, Primary Academy Islington (CoLPAI) development would have a range of serious adverse impacts on the Golden Lane Estate and its residents, and the City of London (CoL) & the London Borough of Islington (LBI). These are as follows:
 1. Servicing vehicles would have to reverse into Hatfield House's car park access, resulting in access / egress restrictions for the car park.
 2. An increase in the number of Heavy Goods Vehicles (HGVs) using Baltic Street West causing increased likelihood of these vehicles coming into conflict with other vehicles. This could include ambulances and fire tenders.
 3. Servicing vehicles would have to reverse off the highway into private land whilst crossing a pedestrian route.
 4. The geometric constraints of Baltic Street West make turning manoeuvres very difficult, increasing the likelihood of vehicles having to overhang or mount the footway in order to turn around. This has safety implications for pedestrians.
 5. Narrow the pool of contractors available for servicing the school due the size and weight restrictions necessarily applied by the planning conditions. This could lead to higher running costs for the school.
 6. Result in multiple point turns by HGVs on the highway which could damage the wearing course of the carriageway leading to higher maintenance costs for CoL and LBI. Potholes resulting from the damage could also have safety implications for cyclists on Baltic Street.
 7. Safety issues for pedestrians and cyclists.
 8. Unsafe turning manoeuvres which would be difficult to perform by even the most competent of drivers.
 9. Require adjustments to the existing highway arrangement and Hatfield House raising arm barrier location.
 10. Engine revving noises and air quality issues when performing turning manoeuvres.
 11. A need for more than one servicing operative to provide a banksman role when vehicles are performing turning manoeuvres resulting in additional servicing costs.
2. All of these adverse impacts can be removed by adopting an alternative servicing arrangement as outlined in this document. This alternative requires no changes to the current school proposals and simply consists of large goods vehicles and refuse vehicles servicing the school from Golden Lane. It is understood that the site was previously

serviced from Golden Lane. Light goods vehicles would be use Baltic Street East to access the site.

3. In summary, the benefits of servicing the school from Golden Lane, with light goods servicing from Baltic Street East are as follows:
 1. No reversing of HGVs is required within the highway or private land.
 2. No damage to the highway as a result of turning HGVs.
 3. Safer for pedestrians and cyclists as HGVs will not need to overhang the footway, reverse within the highway or onto private land and no damage to the wearing course of the carriageway removing the likelihood of potholes.
 4. Light goods vehicles can stop closer to the school reception entrance.
 5. Delivery and servicing vehicles for the school would not have size and weight limits. This could result in cost savings for the school.
 6. The school site layout would not need to be amended.
 7. Deliveries and servicing could be consolidated resulting in cost savings, fewer servicing trips and being more environmentally friendly.
 8. The CoL would not need a license to store refuse bins on the footway between the school site and Hatfield House.
 9. No amendments would be required to the highway on Golden Lane or Baltic Street East.
 10. Noise associated with servicing vehicles and servicing activities would not affect residents of Hatfield House and the Golden Lane Estate.
 11. Removal of air quality issues associated with servicing vehicles on Baltic Street West next to an existing residential block.
 12. Smell issues would be removed from the area next to Hatfield House and the Golden Lane Estate.
 13. Refuse collection would be more efficient for collection operatives as wheeling distances would be shorter, reducing vehicle dwell times.
 14. No supervising of vehicle reversing manoeuvres would be required. Therefore deliveries could be performed by single persons if suitable.
4. It is therefore evident that the alternative servicing arrangements, with refuse collection and goods deliveries by HGVs undertaken from Golden Lane and light goods for the school being delivered from Baltic Street East, is a vast improvement over the currently proposed arrangement resulting in benefits for both the school and local residents whilst removing the negative aspects of the current proposed arrangements.

Baltic Street West

Servicing Technical Note

Introduction

1. Transport Planning Practice (TPP) have been commissioned by the Golden Lane Residents Association (GLRA) to review the servicing arrangements associated with the City of London, Primary Academy Islington (CoLPAI) development. This note firstly sets out our understanding of the proposed delivery and servicing arrangements and the adverse impacts these would have on the Golden Lane Estate, its residents and the highway; it then reviews these proposed servicing arrangements including undertaking a swept path analysis and finally suggests an alternative arrangement that resolves the existing issues the GLRA have with the proposed servicing arrangements, provides a better solution for the school and removes the adverse highway impacts of the current proposals.

Background

2. TPP have reviewed the School Delivery and Servicing (DSP) dated October 2019 prepared by Stantec and associated documentation sent to us by GLRA. The CoLPAI development proposals result in refuse bins being stored on the footway prior to collection outside one of the pedestrian entrances to Hatfield House. It is understood that part of the footway used to store the bins whilst awaiting collection is within the boundary of the Golden Lane Estate. In addition, delivery and refuse collection vehicles would have to reverse into the Hatfield House car park access road which is also within the boundary of the Golden Lane Estate and not part of the adopted highway.
3. The proposed servicing arrangements would have the following adverse impacts on the Golden Lane Estate and its residents, the school, the City of London (CoL) and the London Borough of Islington (LBI):
 1. Servicing vehicles would have reverse into the Hatfield House car park access, resulting in access / egress restrictions for the car park.
 2. Increase the number of HGVs using Baltic Street West increasing the likelihood of these vehicles coming into conflict with other vehicles. This could include ambulances and fire tenders.
 3. Servicing vehicles would have to reverse off the highway into private land whilst crossing a pedestrian route.
 4. The geometric constraints of Baltic Street West make turning manoeuvres very difficult increasing the likelihood of vehicles having to overhang or mount the footway in order to turn around. This has safety implications for pedestrians.
 5. Increase servicing costs for the school due the size and weight restrictions that need to be applied to vehicles in the planning conditions.

6. Result in multi-point turns by HGVs on the highway causing damage to the wearing course of the carriageway which leads to higher maintenance costs for CoL and LBI. Potholes resulting from the damage have safety implications for cyclists on Baltic Street.
7. Reversing manoeuvres off the highway onto private land using steering wheel turning on the spot (explained in more detail below) sets a dangerous precedent for CoL and LBI when other planning applications are submitted.

Vehicle swept path analysis

4. The School DSP contains Peter Brett Associates (PBA) drawing 37845/5501/004 showing an 8m rigid Heavy Goods Vehicle (HGV) turning around on Baltic Street West and utilising the Hatfield House car park access as a turning head. The manoeuvre appears to be very tight given the constraints of the highway and the size of the vehicle used. To establish whether this manoeuvre is feasible TPP have undertaken swept path analysis with the same 8m rigid HGV and comparable refuse vehicles.
5. TPP have used Autodesk Vehicle Tracking to replicate the turning manoeuvre on PBA drawing 37845/5501/004 which is contained in Appendix A of this technical note for reference. The results of the tracking exercise demonstrate that the manoeuvre is possible, see TPP drawing 31274/AC/001 left-hand side viewing pane, however steering wheel turning on the spot is required at multiple points throughout the manoeuvre.
6. Swept path analysis using turning on the spot is not generally accepted by highway authorities as it removes all margin for error and would result in excessive tyre wear and damage to wearing course of the carriageway, **particularly by HGVs. In TPP's experience,** turning on the spot has only been accepted by highway authorities in exceptional circumstances where the manoeuvre takes place on private land and by light vehicles such as cars. Therefore it is surprising that the manoeuvre shown on PBA drawing 37845/5501/004 has been deemed acceptable by CoL and LBI.
7. TPP drawing 31274/AC/001 shows the same manoeuvre as the PBA drawing without utilising turning on the spot in the middle and right-hand side viewing panes, i.e. lock-to-lock steering times and speed set to standard. The middle viewing pane shows that a 5-point manoeuvre is required to turn based on the proposed location of the bollards but still results in some body overhang of the footway. The right-hand viewing pane demonstrates the carriageway space needed to perform a 3-point turn more safely i.e. with standard steering lock-to-lock times activated. The drawing shows that the bollards and car park raising arm barrier would need to be relocated in order to accommodate this manoeuvre.
8. The School DSP does not contain swept path analysis of a refuse collection vehicle. Therefore TPP have undertaken a vehicle tracking exercise utilising a refuse vehicle within the Autodesk **Vehicle Tracking software's library that is comparable to the 8m rigid** HGV shown on the PBA drawing. The results of the vehicle tracking are shown on TPP drawing 31274/AC/002. The drawing repeats the manoeuvre scenarios on TPP drawing 31274/AC/001, with a turning on the spot manoeuvre shown on the left-hand side viewing pane, then with lock-to-lock steering times and speed set to standard, a 5-point turn manoeuvre in the middle viewing pane and the right-hand side viewing pane demonstrating the space needed to perform a 3-point turn. The left and middle viewing panes are based on the proposed bollard location. The 5-point turn shows that some

vehicle body overhang would be experienced and all three manoeuvres show that the car park raising arm barrier would need to be relocated.

9. TPP have also undertaken a vehicle tracking exercise utilising the refuse vehicle dimensions and tracking settings used by the CoL's cleansing team. It is worth noting this vehicle is slightly shorter than the 8m rigid HGV shown on the PBA drawing. The results of the vehicle tracking are shown on TPP drawing 31274/AC/003. The drawing repeats the manoeuvre scenarios on TPP drawings 31274/AC/001 and 31274/AC/002. The left and middle viewing panes are based on the proposed bollard location. The 5-point turn shows that some vehicle body overhang would be experienced and all three manoeuvres show that the car park raising arm barrier would need to be relocated.
10. It is worth noting at this point that the LBI *Recycling and Refuse Storage Requirements* guidance document sets out that a refuse collection vehicle of 11m in length should be used in the planning of developments.
11. The results of the vehicle tracking exercise demonstrate that HGVs cannot turn safely or efficiently within the existing and proposed constraints of Baltic Street West. The steering wheel turning on the spot and 5-point turn manoeuvres leave little margin for error. In practice, it is likely servicing vehicles would overhang the footway more than is shown on the tracking drawings as drivers tend to use the kerbs as a reference point and drive until their wheels touch them. This would lead to safety implications for pedestrians.
12. The tracking exercise also shows that the all servicing vehicles would have to reverse off the highway onto private land to turn around and that the raising arm barrier to the Hatfield House car park would need to be relocated.
13. In summary, the proposed turning manoeuvres on Baltic Street West and loading arrangements result in the following adverse impacts in addition to 1 to 7 above:
 8. Safety issues for pedestrians and cyclists.
 9. Unsafe turning manoeuvres which would be difficult to perform by even the most competent of drivers.
 10. Adjustments to the existing highway arrangement.
 11. Engine revving noises and air quality issues when performing turning manoeuvres.
 12. A need for more than one servicing operative to provide a banksman role when vehicles are performing vehicle manoeuvres resulting in additional servicing costs.

Impacts of current servicing arrangements

14. Servicing vehicles would need to stop on the single yellow lines on the southern side of Baltic Street West directly to the west of the Hatfield House car park access. They cannot stop within the Hatfield House access as they would obstruct vehicles accessing / egressing the car park and emergency vehicles such as ambulances which would stop as close to the entrance to Hatfield house as possible. The Hatfield House vehicle access is labelled with 'KEEP CLEAR' road markings.
15. Once a refuse vehicle has turned around and stopped on the single yellow line markings, the wheeling distance for the bins from of the temporary storage point on the footway between the school site and the Hatfield House main entrance to the rear loading point

of the vehicle is circa 25m. The maximum wheeling distance used by councils, including LBI, is typically 10m for 4-wheeled bins which are the type shown on the Proposed Ground Floor Plan and Site Layout prepared by Hawkins\Brown, drawing number COL-HBA-00-00-DR-A-00_201. This drawing is contained within Appendix B for reference. Whilst longer wheeling distances can be agreed with refuse collection contractors, the time taken to pull the bins to and from the vehicle would result in increased vehicle dwell times. It also results in increased noise from bins being pulled over a longer distance.

16. The location of the temporary bin storage area and where the refuse vehicle will need to stop results in the bins needing to be wheeled along the footway, across the car park access and then into the Baltic Street West carriageway. The surface is not level and therefore bins need to be pulled down a dropped kerb, the width of which appears to be inadequate for the 4-wheeled bins proposed. Further, deliveries for the school would either need to be carried / wheeled circa 20m to the school reception entrance door or for the school kitchen, which would tend to be more bulky goods, much further, circa 30m, into the school grounds or left within the temporary bin storage area. The School DSP is silent on these details and therefore further clarification is required.
17. Given the size of the site and the type of development being brought forward it is surprising that on-site servicing has not been provided or as a minimum an on-street loading bay. The proposed school servicing arrangements appear to be afterthought rather than being planned from an early stage within the design. They are separated from the commercial and residential uses meaning delivery and servicing cannot be consolidated across all uses, a departure from regional policy, and they are located next to residential development resulting in noise, smell and access issues. In addition, the school servicing vehicles need to access the site by Baltic Street West which due to its geometric constraints imposes size and weight restrictions on the vehicles that can be used. This constrains the school when sourcing delivery and servicing contractors, potentially leading to higher costs.
18. Given the issues with the currently proposed servicing arrangements TPP have explored alternative options to see if one might have a lesser impact on the Hatfield House residents, does not create safety issues and provides a better servicing solution for the school. Such an option is discussed below.

Option for alternative servicing arrangements

19. It is understood that the site was previously serviced from Golden Lane, including refuse collection. The residential and commercial aspects of the development proposals continue this approach to servicing. If Golden Lane was used for servicing there would be no need to impose size and weight restrictions on vehicles associated with the school which is the case with the current proposals. This would have a number of benefits, particularly in negotiating contracts as there would be more flexibility in the type of vehicle that could be used for servicing. In addition, delivery and servicing for the school could be consolidated with the residential and commercial uses of the site which is in-line with regional policy, therefore reducing the number of vehicle trips and resulting in a more environmentally friendly arrangement. This may also result in cost savings for the school.
20. The currently proposed layout of the school and its refuse storage would not need to change if Golden Lane was used by the school for refuse collection and servicing. As per the School DSP, the school facilities management would wheel the bins to a temporary refuse collection point within the grounds of the school. For Golden Lane this would be

next to the main pupil entrance. From this location, the bins would be within a 10m wheeling distance from where the rear of the refuse collection vehicle would stop. Planning Condition 43 requires that all servicing is carried out between 10:00 and 14:00 and the Stantec DSP accords with these requirements. Therefore refuse collection would not interfere with pupils arriving and departing the school, and could be managed around school playtimes. It is understood that in the interests of pupil safety, the school gates must be kept locked except when pupils arrive and depart the site. The school facilities management would oversee the refuse collection activity whilst also maintaining a security presence at the school gates.

21. Turning to the matter of deliveries, bulky goods such as those for the school kitchen which arrive on HGVs could also be delivered to the site through the main school entrance on Golden Lane. An intercom system at the main school entrance could be linked with the reception which would allow staff to determine the delivery type and deploy school facilities management staff to receive the goods.
22. Smaller deliveries, such as those by couriers in light vans could be undertaken from Baltic Street East. There is already a turning head within the existing highway to facilitate this without the need to turn on private land or block access to neighbouring developments. In addition, the carry distance from where the vehicle would stop is shorter than if vehicles stopped on Baltic Street West as they can stop near the school reception.
23. It is noted that the school proposals result in the loss of the turning head on Baltic Street East due to the relocation of the bollards to form a wider at grade pedestrian crossing in front of the school entrance. There does not appear to be a planning need to provide a wider crossing in this location as the main pupil access is on Golden Lane and therefore the school entrance on Baltic Street would be for visitors and staff only. Therefore, the current school development proposals could still be brought forward whilst the turning head on Baltic Street East is retained.
24. In summary, the benefits of servicing the school from Golden Lane, with light goods servicing from Baltic Street East are as follows:
 1. No reversing of HGVs is required within the highway or private land.
 2. No damage to the highway as a result of turning HGVs.
 3. Safer for pedestrians and cyclists as HGVs will not need to overhang the footway, reverse within the highway or onto private land and no damage to the wearing course of the carriageway removing the likelihood of potholes.
 4. Light goods vehicles can stop closer to the school reception entrance.
 5. Delivery and servicing vehicles for the school would not have size and weight limits. This could result in cost savings for the school.
 6. The school site layout would not need to be amended.
 7. Deliveries and servicing could be consolidated resulting in cost savings, fewer servicing trips and being more environmentally friendly.
 8. The CoL would not need a license to store refuse bins on the footway between the school site and Hatfield House.

9. No amendments would be required to the highway on Golden Lane or Baltic Street East.
10. Noise associated with servicing vehicles and servicing activities would not affect residents of Hatfield House and the Golden Lane Estate.
11. Removal of air quality issues associated with servicing vehicles on Baltic Street West next to an existing residential block.
12. Smell issues would be removed from the area next to Hatfield House and the Golden Lane Estate.
13. Refuse collection would be more efficient for collection operatives as wheeling distances would be shorter (10m or less), reducing vehicle dwell times.
14. No supervising of reversing manoeuvres would be required. Therefore deliveries could be performed by single persons if suitable.

Conclusion

25. The currently proposed servicing arrangements for the school present a number of issues for the residents of Hatfield House and the Golden Lane Estate, the school, the City of London and the London Borough of Islington. These issues can be resolved if the revised servicing arrangements outlined above are adopted. These alternative arrangements consist of refuse collection and goods deliveries by HGVs undertaken from Golden Lane and light goods for the school being delivered from Baltic Street East where there is an existing turning head.
26. The alternative proposal for servicing addresses all of the issues the residents of Hatfield House have with the current servicing arrangements, and provides a range of benefits for the school, the City of London and the London Borough of Islington when compared to the current proposals. In addition it requires no changes to the school and provides safer and more efficient servicing that does not require any amendments to the existing highway.
27. It is therefore evident that the alternative servicing arrangements, with refuse collection and goods deliveries by HGVs undertaken from Golden Lane and light goods for the school being delivered from Baltic Street East, is a vast improvement over the currently proposed arrangement resulting in benefits for both the school and local residents, whilst removing the negative aspects of the current proposed arrangements.

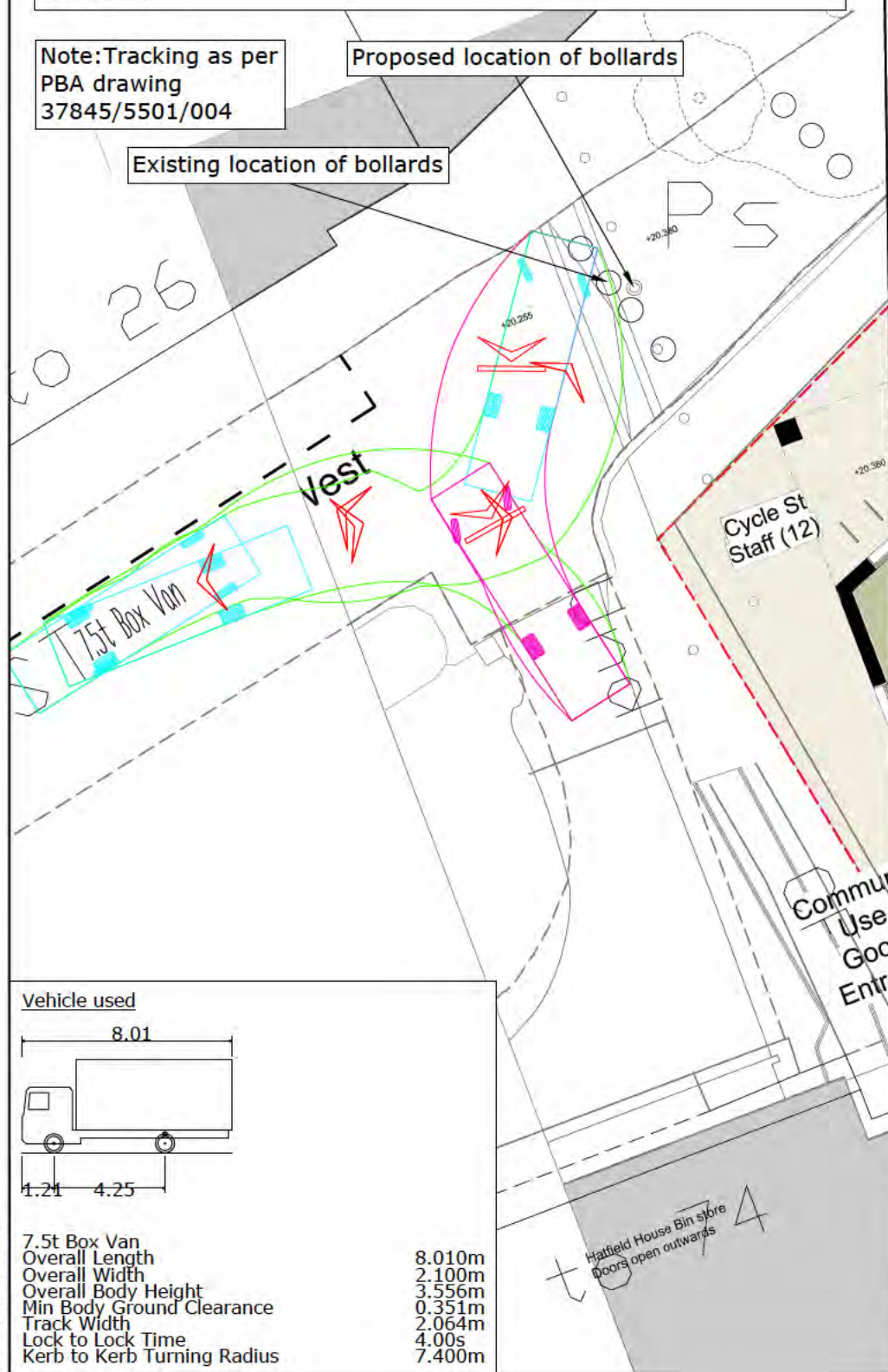
Drawings

Steering wheel turning on the spot used

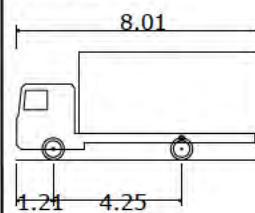
Note: Tracking as per PBA drawing 37845/5501/004

Proposed location of bollards

Existing location of bollards



Vehicle used

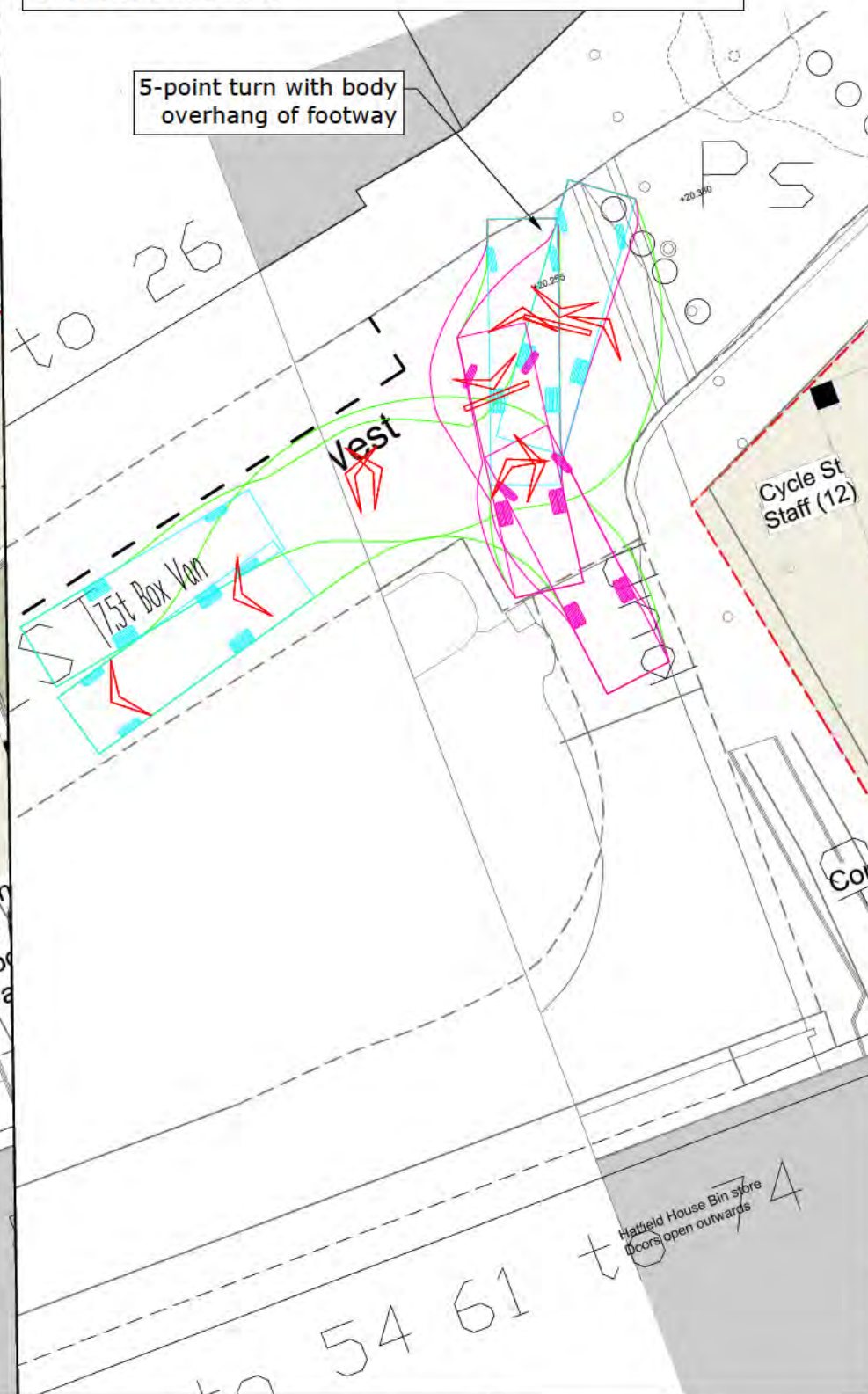


7.5t Box Van
Overall Length
Overall Width
Overall Body Height
Min Body Ground Clearance
Track Width
Lock to Lock Time
Kerb to Kerb Turning Radius

8.010m
2.100m
3.556m
0.351m
2.064m
4.00s
7.400m

Standard steering lock-to-lock times used

5-point turn with body overhang of footway



Space required for 3-point turn using standard steering lock-to-lock times



BALTIC STREET WEST

Swept path analysis of 8m rigid HGV

SCALE @ A3 1:200



DATE

24/03/21

DRAWN BY

LD

CHECKED

CWP

TRANSPORT PLANNING PRACTICE

70 Cowcross Street
London, EC1M 6EL

t: 020 7608 0008
w: www.tppweb.co.uk



DRAWING NUMBER

31274/AC/001

REV

-

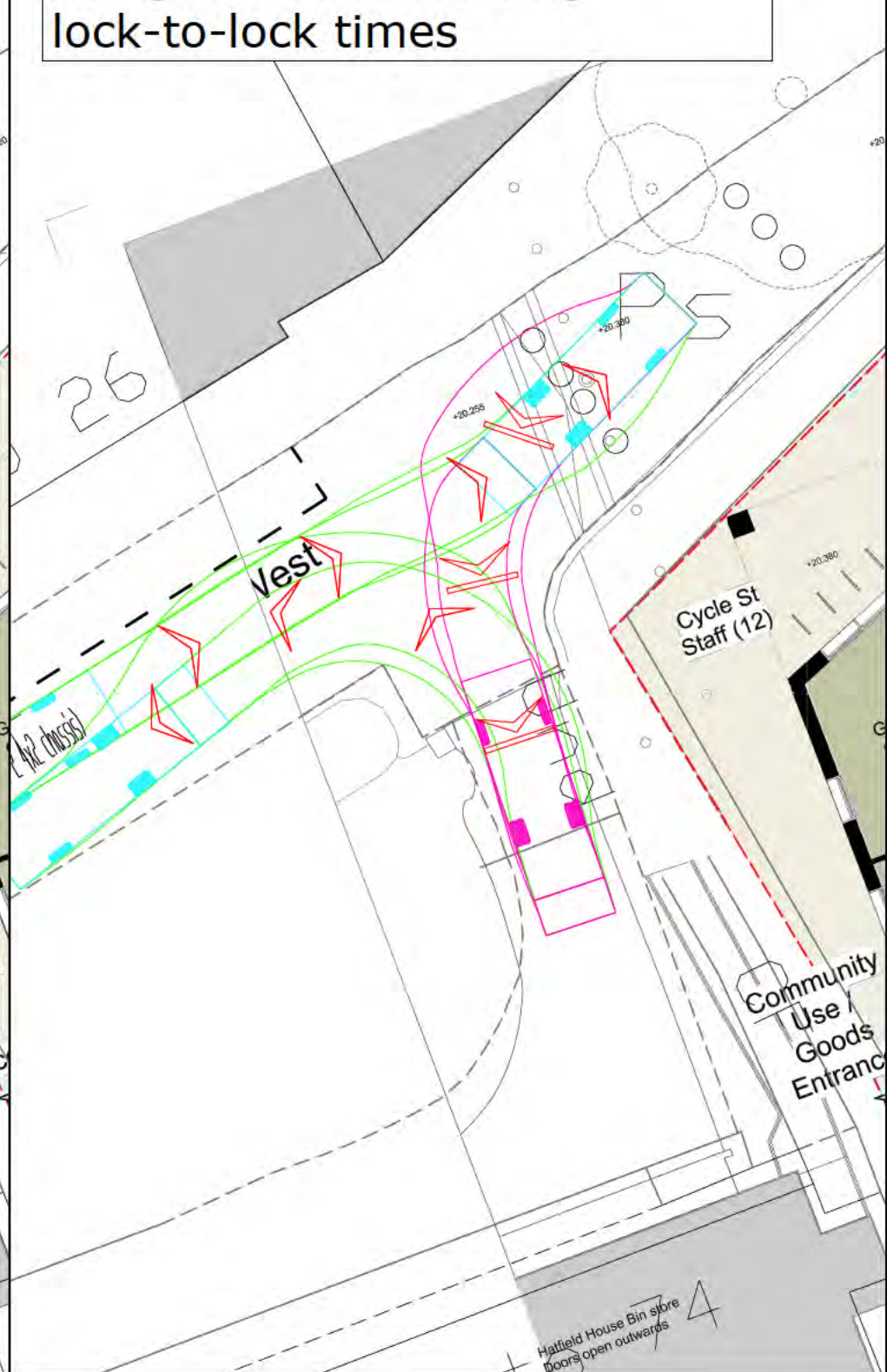
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Steering wheel turning on the spot used

Standard steering lock-to-lock times used

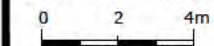
Space required for 3-point turn using standard steering lock-to-lock times



BALTIC STREET WEST

Swept path analysis of 8.1m refuse vehicle

SCALE @ A3 1:200



DATE

24/03/21

DRAWN BY

LD

CHECKED

CWP

TRANSPORT PLANNING PRACTICE

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DRAWING NUMBER

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REV

-



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Steering wheel turning on the spot used

Standard steering lock-to-lock times used

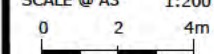
Space required for 3-point turn using standard steering lock-to-lock times



BALTIC STREET WEST

Swept path analysis of Dennis Eagle RCV refuse vehicle used by the City of London

SCALE @ A3 1:200



DATE

24/03/21

DRAWN BY

LD

CHECKED

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31274/AC/003

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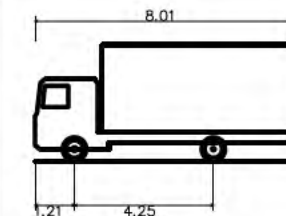
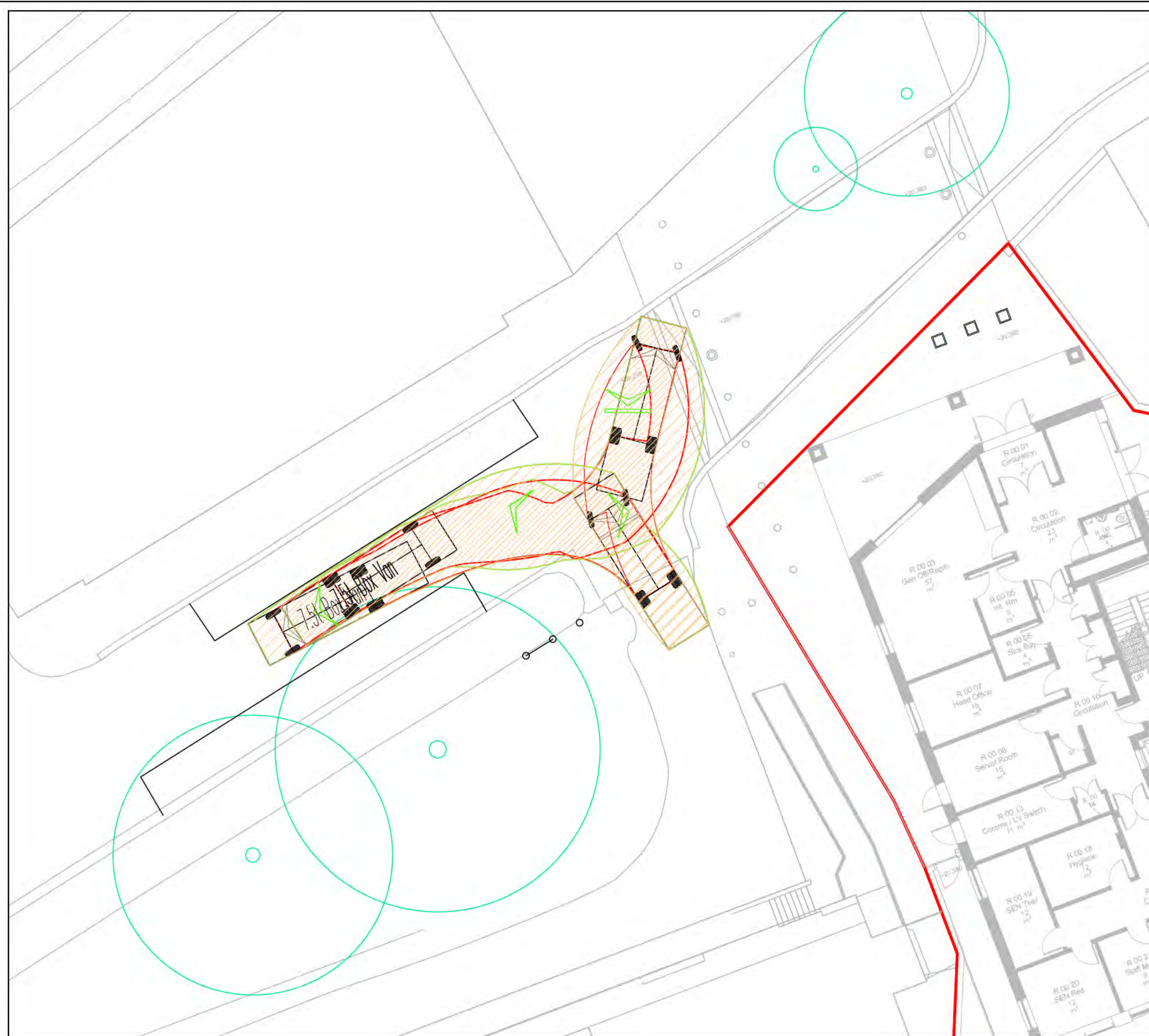
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This drawing has been prepared for planning purposes and should not be used for construction. It should be read in conjunction with TPP document D001.

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Appendices

Appendix A



7.5t Box Van
Overall Length 8.010m
Overall Width 2.100m
Overall Body Height 3.556m
Min Body Ground Clearance 0.351m
Track Width 2.064m
Lock-to-lock time 4.00s
Curb to Curb Turning Radius 7.400m

Mark	Revision	Date	Drawn	Chkd	Appd

SCALING NOTE: Do not scale from this drawing. If in doubt, ask.
UTILITIES NOTE: The position of any existing public or private sewers, utility services, plant or apparatus shown on this drawing is believed to be correct, but no warranty to this is expressed or implied. Other such plant or apparatus may also be present but not shown. The Contractor is therefore advised to undertake their own investigation where the presence of any existing sewers, services, plant or apparatus may affect their operations.

Drawing Issue Status
FOR INFORMATION

**GOLDEN LANE ESTATE
SWEEP PATH ANALYSIS
7.5t BOX VAN**

Client CITY OF LONDON			 Offices throughout the UK and Europe www.peterbrett.com © Peter Brett Associates LLP LONDON Tel: 020 3824 6600
Date of 1st Issue 12/02/2018	Designed -	Drawn JS	
A3 Scale 1/200	Checked MD	Approved MD	
Drawing Number 37845/5501/004		Revision -	

Appendix B



Basted Service Road



OBJECTIONS TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND LONDON BOROUGH OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679 FOR THE CITY OF LONDON PRIMARY ACADEMY ISLINGTON SERVICING ARRANGEMENTS

I OBJECT to the above applications for the reasons listed below:

Flawed application

When residents belatedly were made aware of the original of this application back in November 2020, several respondents pointed out inconsistencies, errors and other flaws. This revised application contains similar issues, including but not limited to:

- Continued erroneous reference to Basterfield service road
- Incorrect placement of the demountable bollards between Baltic Street West and East
- Implications that bins will be on Colpai land when actually several sq feet of Golden Lane Estate land will be used without leaseholder consultation
- Incorrect and missing data about the number of collections necessary
- False information about multiple vehicles using the street, and hence erroneous assumptions about where vehicles can wait
- No evidence for adequate provision for bins for school waste and no concrete information on whether food will be prepared on site - and where the waste goes

The original planning application for the Colpai project was granted on condition that the applicant consult with neighbours on the servicing to the school. With just 6mths before pupils are expected to be onsite, it's clear that servicing along with many other management aspects is an afterthought and neighbours are again expected to put up with the shoddy results of a hasty job.

Golden Lane Estate residents (many of whom are qualified in relevant professional fields) and other experts have proposed several alternatives for waste collection. All these have been ignored or dismissed by the applicant, which is baffling. The outcome of a specially commissioned report on the proposals includes this quote:

"It is therefore evident that the alternative servicing arrangements, with refuse collection and goods deliveries by HGVs undertaken from Golden Lane and light goods for the school being delivered from Baltic Street East, is a vast improvement over the currently proposed arrangement resulting in benefits for both the school and

local residents whilst removing the negative aspects of the current proposed arrangements."

The Richard Cloudesley School which previously occupied the site used Golden Lane for servicing. Other options include Fann Street or Baltic Street East. The applicant has not considered them.

Whenever neighbours suggest that waste could be stored or collected elsewhere, the response seems to centre around a refusal to transport waste through the school playground. Placing storage of the bins elsewhere would solve this or maybe just - wheel the bins through the playground while children are in class? Presumably the playground is not always in use? To protect the children of Colpai from seeing practical life in action, the children of Hatfield House will be shown the reality of living on a council estate in the City of London - someone else's vast amount of rubbish under the window of the bedroom where they sleep, and within touching distance of their front door.

Safety

Baltic Street West is a cul de sac with several minor feeder roads from Old Street as well as the entrance from Goswell Road. It is busy. There is parking on both sides (not acknowledged in the application) and it is used all day by delivery vans and contractor vehicles as there is always maintenance work going on somewhere. It is a cycle and motor cycle route. There is a motorcycle park heavily used all day by couriers. It is a low pollution alternative to Old Street and hence used heavily by pedestrians and of course by the 56 households of Hatfield House.

Additionally there is lots of construction and renovation going on, including new motorcycle parking and other public realm changes.

It is staggering that this road has been deliberately chosen by the applicant for servicing when there are far safer candidates. City of London services the Estate via the ramp to the carpark and the large trucks [tend to reverse rapidly down the street](#) at a high speed, emitting an infernal beeping sound before heading down to the carpark ramp. The idea of Islington trucks using the same route is laughable if it wasn't actually being seriously proposed. If they arrive in forward gear the manoeuvre is unsafe if even possible. As described above the road is hectic. Drivers would need to watch out in 4 directions.

The vehicles will block the ramped access to Hatfield House which is used continuously by residents including those with babies and children in prams, pushchairs and on trikes, scooters and ride ons. Also by wheelchair users. Vehicles

will block the access from the ramp to the dropped kerb access to the pavement, leaving us to either wait for ~8 minutes or take our chances in the road.

The applicant has totally ignored the impact this has on residents of Hatfield House, as has been a theme throughout this entire development. A choice quote speaks for itself:

"As per the conditions, these trips are to occur between the hours of 10:00 and 14:00 to avoid conflict with peak hours for school pupil drop off and collection. Therefore, the impact of these trips is considered to be negligible."

Negligible for whom?

As always, parents and pupils are considered and those who live next door totally ignored. This is staggering. Multiple collections between 10-2 to accommodate the school day are also right at nap times for the preschoolers of Hatfield House, who will hear the rumble of bins, the maneuvers of trucks and the beeping of reversing alarms while trying to sleep.



Amenity

This proposal makes it even clearer to a resident of a City of London council estate just how much their worth is in the eyes of a rich and powerful landlord. The access point to our home will be a “poor door”. The applicant seems set on keeping

unsightly and inconvenient facts of life such as bins and waste from the eyes of pupils, teachers and parents. Instead, the folk on the council estate next door get to look at it and smell it and hear it being cleared away every day, all the while being prevented from getting in and out of their own building safely.

Several large bins will be placed 1.5m from our door. The applicant suggests they will be there for a maximum of 20mins but this assertion is not based on facts and is fanciful. Similar sized schools in Islington eg Prior Western report larger numbers of bins and more frequent collections. At the same time they report issues with collections meaning certain waste types build up. The bins will linger.

We object to the smell, especially in the heat of summer, the buildup of waste, dropped waste, foxes, rodents and other vermin, dumped waste from passers by who spot bins there and use them as a public tip. Couriers currently make a nuisance of themselves urinating in this area, soon they'll have some bins to shelter behind. The onsite nursery has 38 places but no mention is made for provision of bins for food and human waste in nappies. There is nowhere else in the plans for this to go so we assume it will be in this spot outside our door, below our window.

In summary I object wholeheartedly and urge you to think when considering this application of the people of Hatfield House and the users of Baltic St West - whose safety is severely compromised by the proposal. The proposal would also be unthinkable if Hatfield House was a private development.

Lisa Scott
41 Hatfield House

Begum, Shupi

From: Evans, Catherine
Sent: 30 March 2021 09:55
To: DBE - PLN Support
Subject: FW: Planning application 20/00748 (CoL); P2020/2706/AOD (Islington)

Hello,

Please can this be uploaded to 20/00748/MDC and 20/00747/MDC.

Thanks,
Catherine

From: Biddy Peppin [REDACTED]
Sent: 27 March 2021 17:57
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>; thomas.broomhall@islington.gov.uk
Subject: Planning application 20/00748 (CoL); P2020/2706/AOD (Islington)

I wish to object to the inadequate DSP outlined for planning applications 20/00748 (CoL); P2020/2706/AOD (Islington), on the following grounds:-

- 1) The proposal places the School's bin collection site next to the front door of Hatfield House instead of in front of the School
- 2) Emptying waste bins in Baltic St. West is impractical. Baltic St. West is a heavily-parked cul-de-sac that is used daily by Golden Lane Estate residents with garages or parking spaces, by maintenance and repair contractors and by the owners of commercial units. It is also heavily used by cyclists and pedestrians.
- 3) The proposed bin collection site would require waste collection vehicles to make 3-point turns in an extremely constricted space next to the Hatfield House access ramp. This would present a particular danger to those entering and leaving Hatfield House (especially children and disabled residents), as well as to cyclists and other pedestrians, and would potentially block access by the emergency services.
- 4) Since it has now been determined that school meals will be prepared on-site, the School is likely to generate more waste than originally envisaged. There will need to be more frequent waste collections.

To sum up: The siting of food and sanitary waste bins next to the front entrance to Hatfield House, would have a serious impact on the amenities enjoyed by the Hatfield House residents, due to the contents of the bins (discarded food and nappies), the proximity of the waste collection site, the frequency of visits by waste collection vehicles and the inadequacy of turning space.

Conclusion: There needs to be proper consideration of the option of siting the waste bin collection point in Golden Lane. This would be closer to the school, would offer good access to large vehicles, and would have less impact on residents and road-users.

Brigid Curtis
12, Stanley Cohen House,
Golden Lane Estate,
London EC1Y 0RL

Begum, Shupi

From: Evans, Catherine
Sent: 30 March 2021 09:56
To: DBE - PLN Support
Subject: FW: Objections: planning application 20/00748 (CoL) / P2020/2706/AOD (Islington)

Hello,

Please can this be uploaded to 20/00748/MDC and 20/00747/MDC.

Thanks,
Catherine

From: Eric Campbell [REDACTED]
Sent: 28 March 2021 09:15
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>; thomas.broomhall@islington.gov.uk
Subject: Objections: planning application 20/00748 (CoL) / P2020/2706/AOD (Islington)

Dear Catherine and Thomas

I am writing to object to the inadequate DSP outlined for planning application 20/00748 (CoL) / P2020/2706/AOD (Islington). To confirm, I am lodging an objection and not making comments.

In addition to the objections set out in the Golden Lane Estate Residents' Association letter of October 2020, I have the following objections to this planning application.

1. Bins should be left for collection in front of the school and not by the front entrance to Hatfield House. The school's waste has nothing to do with Hatfield House, and so there is no justifiable reason for leaving this waste in a location that is seriously prejudicial to Hatfield House residents (as well as other Golden Lane Estate residents). Given the COVID pandemic, I am concerned about the school's waste being left in such close proximity to a residential building.
2. Baltic Street West is already an extremely busy cul-de sac with vehicles frequently accessing the barriered Golden Lane undercroft parking. Having trucks regularly collect school rubbish would increase noise and other forms of pollution. Proper consideration should be given to those residents who normally work from home and those who are having to do so as result of the COVID pandemic.
3. The entrance to the Golden Lane Estate in Baltic Street West is used daily by the maintenance and repairs contractors, commercial unit owners and residents with garages or parking spaces as well as daily waste and bi-weekly recycling collections for the estate. It is also used, when required, by emergency vehicles. Having waste being collected from the proposed location (and having vehicles doing three-point turns) would impact detrimentally on access rights to the estate.
4. There is parking on both sides of Baltic Street West making it narrow and active. It is used as a bicycle and motor cycle route through to Baltic Street East as well as by delivery vehicles. Baltic Street (West and East) is also heavily used by pedestrians (including estate residents that cross it coming from the passage under Hatfield House). Having vehicles doing three-point turns would constitute an unacceptable danger to cyclists and pedestrians.
5. Golden Lane or Baltic Street East are preferable locations for the school's waste collection and there seems to have been a serious failure to consider waste being collected from these locations.

6. There is potentially not enough space in the designed bin store for the quantity of waste and the frequency with which waste is to be collected. There has been a failure to provide any evidence that the store is sufficiently large enough to be able to store the amount of waste generated by the school.

Overall, this application is yet another instance of the City of London not valuing the Golden Lane Estate's listed building status as well as key aspects of, and recommendations set out in, the Golden Lane Estate Listed Building Management Guidelines. The whole COLPAI scheme represents a very striking example of the City of London implementing detrimental changes that have had, and will continue to have, an overall negative impact on the Golden Lane Estate and its residents.

Yours sincerely.

Eric Campbell
30 Hatfield House
Golden Lane Estate
EC1Y 0ST

Begum, Shupi

From: Evans, Catherine
Sent: 30 March 2021 09:57
To: DBE - PLN Support
Subject: FW: Objection to planning application 20/00748

Hello,

Please can this be uploaded to 20/00748/MDC and 20/00747/MDC.

Thanks,
Catherine

From: Jane Carr [REDACTED]
Sent: 28 March 2021 13:45
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Subject: Objection to planning application 20/00748

I wish to lodge an objection rather than a comment.

I wish to object to the inadequate DSP outlined for planning application [20/00748](#)

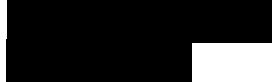
OBJECTIONS

- The COLPAI team has consistently failed to provide adequate information to residents that their plans are based on sound evidence referring to 'assumptions', 'anticipated' trips and deliveries, 'likely' deliveries, and 'expected' deliveries with no firm evidence to back this up.
- COLPAI has also failed to consider the much safer and more feasible option of using Baltic St East or Golden Lane or to modify their dangerous plans in any way.
- I strongly object to the proposals for refuse collection to be from Baltic St West for the following reasons:
- It is dangerous to pedestrians and road users as vehicles will be required to make 3 point turns in a very narrow and busy street, blocking access to emergency vehicles and no risk assessments have been provided to show that this is viable.
- Locating the bin store close to Hatfield House has not considered the true effect this will have on residents as unrealistic and substantiated figures have been provided.
- The bin store seems too small and no allowance has been made for the separate collection of food waste. There is no separate bin indicated for nappies from the nursery which makes all calculations unviable.
- No evidence has been provided to reassure residents that the size of bin store is adequate and that there is contingency if it is overfilled. Residents have just been told that it is 'considered adequate to meet the needs'. If bins are overfilled this will encourage vermin and be a fire hazard.
- The waste is from the school and yet bins will be left for collection by Hatfield House front door when it should be left in front of the school. This entrance to Hatfield House is the only accessible entrance meaning the risks due to increased volumes of traffic will have an unequal impact on the most vulnerable members of the community.
- Baltic Street West is a busy cul-de sac with vehicles accessing the barriered Golden Lane undercroft parking. Used daily by the maintenance and repairs contractors, commercial unit owners and

residents with garages or parking spaces as well as daily waste and bi-weekly recycling collections for the estate.

- There is parking on both sides of Baltic Street West making it narrow and active. It is also a cycle route through to Baltic Street East and a quiet route running parallel to Old Street. Estate residents cross it coming from the passage under Hatfield house to access the busses on Old Street. Baltic Street East is straight, has no parking and is mainly offices.

Jane Carr
50 Basterfield House
Golden Lane Estate
London, EC1Y 0TR



Begum, Shupi

From: Evans, Catherine
Sent: 30 March 2021 13:47
To: DBE - PLN Support
Subject: FW: Objection to planning app no 20/0748MDC, 20/00747MDC, 2020/2706AOD, 2020/2679 Colpai

Hello,

Please can this objection be uploaded to 20/000747/MDC and 20/000748/MDC.

Thanks,
Catherine

From: david.cox37 [REDACTED]
Sent: 30 March 2021 12:14
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>; thomas.broomhall@islington.gov.uk
Subject: Re: Objection to planning app no 20/0748MDC, 20/00747MDC, 2020/2706AOD, 2020/2679 Colpai

Dear Sirs

further to my objection I subsequently noticed a minor error in the labels on the waste disposal amended plan/drawing which read 'refuse lorry 10 x 2m' and should read '10 x 2.7m'.

Apologies . David Cox

----- Original Message -----

From: "david.cox37" [REDACTED]
To: catherine.evans@cityoflondon.gov.uk; thomas.broomhall@islington.gov.uk
Sent: Monday, 29 Mar, 2021 At 14:15
Subject: Objection to planning app no 20/0748MDC, 20/00747MDC, 2020/2706AOD, 2020/2679 Colpai

Dear Sirs

please see objection details as attached including a plan & photo of the access.

Because this concerns Fire Safety and I have received two different opinions from the London Fire Brigade Inspectors I will try to refer the matter to the Ministry H,C & LGov for guidance or possibly Determination.

Yours sincerely

D W Cox

Begum, Shupi

From: Paul Drinkwater [REDACTED]
Sent: 29 March 2021 21:23
To: Simon.greenwood@islington.gov.uk; Evans, Catherine; PLN - Comments;
Thomas.Broomhall@islington.gov.uk
Subject: OBJECTIONS TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND
LONDON BOROUGH OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679 FOR THE CITY
OF LONDON PRIMARY ACADEMY ISLINGTON SERVICING ARRANGEMENTS.
Attachments: COLPAI application objection.pdf

Ref: OBJECTIONS TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND LONDON BOROUGH
OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679 FOR THE CITY OF LONDON PRIMARY ACADEMY
ISLINGTON SERVICING ARRANGEMENTS.

Dear all,

I would like to OBJECT to the above applications for the reasons listed below:

- 1) they are dangerous and risk the life of those using and living in Baltic Street West
- 2) they create a public nuisance to those living in Hatfield House
- 3) they fail to seriously assess other, safer, options for servicing the school.

I have attached a letter outlining the reasons for my objections.

Paul Drinkwater
41 Hatfield House
Golden Lane Estate
London
EC1Y 0SU

41 Hatfield House
Golden Lane Estate
London
EC1Y 0SU
29 March 2021

Dear Sirs

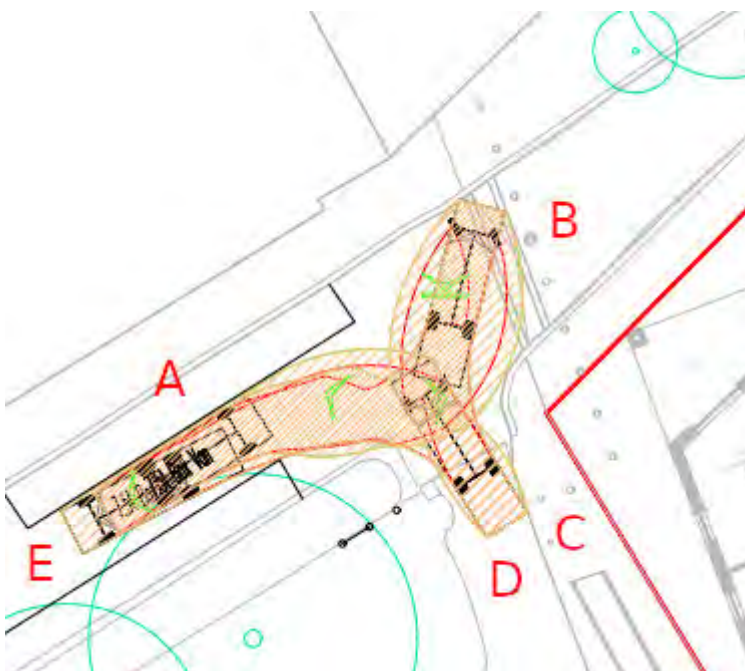
Ref: P2020/2706/AOD: Approval of Details pursuant to condition 43 (Delivery and Servicing Plan for School) and 46 (collection of refuse) of planning permission reference; P2017/2961/FUL, dated; 19/07/2018. RECONSULTATION - Additional information received.

I would like lodge a strong objection to this planning application amendment on three grounds, as it:

- 1) is dangerous and risks life of those using and living in Baltic Street West
- 2) creates a public nuisance to those living in Hatfield House
- 3) fails to seriously assess other, safer, options for servicing the school

1) Danger and risk to life of people using Baltic Street West

Baltic Street West is a busy and narrow cul-de-sac with parking on both sides. To its south is Hatfield House, which comprises 56 flats of mixed social and private residents. Residents include people whose only access to the street is via an accessible ramp to the east of the block, such as parents with pre-school children, elderly and vulnerable people, people with disabilities, and cyclists. Almost beyond belief, this application advocates the reversing of lorries into the entrance of the Golden Lane Estate car park, and towards the walkway from which people exit and enter Hatfield House, as per this diagram:



Risk to those leaving the accessible ramp on Hatfield House

Over the past month, Golden Lane Residents have had first-hand insight into just how dangerous this proposal will be. Refuse lorries (equal to the size of vehicles that will service COLPAI) have started reversing down the entirety of Baltic Street West from Goswell Road, as they cannot perform the three point turn suggested in the proposal. A video of the maneuver can be seen here:

<https://www.youtube.com/watch?v=b4sy6UDB2AE>

I use the accessible entrance to Hatfield House daily while escorting my 18 month old daughter to nursery in her pushchair. On three recent occasions while exiting Hatfield House towards Old Street, a refuse truck has reversed towards us between points B & C of the above diagram, and each time I have had no indication that we have been seen.



I understand there are inaccuracies in the proposal's sweep diagram and there is no evidence in the application that the turning manoeuvre upon which it hinges is feasible or safe. The video above would suggest it is not. However lorries are intended to turn, it creates the obvious danger of large vehicles with limited vision reversing near or into pedestrians with limited mobility on an

accessible pedestrian ramp (point C on the diagram above). If accepted, this proposal will greatly increase the frequency of such dangerous manoeuvres and the risk of fatalities on Baltic Street West.

It should also be noted that the concrete bollard nearest the car park entrance at point C is already at an angle, where it has presumably been hit by a reversing vehicle.



Risk to motorcyclists

It is surprising this proposal does not mention that following a separate recent planning application, two motorcycle parking areas (Sycamore Street and the space between Baltic Street West and Baltic Street East) are in the process of being moved, which will directly affect this application. Motorcycle parking is being concentrated at Point A on the diagram above, directly opposite the Golden Lane Estate car park entrance. As couriers will either be sitting on or standing directly next to their motorcycles, this proposal will also put their lives directly at risk from reversing lorries. It would seem that the two planning applications are incompatible with each other, and together create an extremely dangerous situation.



Risk to cyclists

Baltic Street West has always been a busy through-route for cyclists wanting to avoid Old Street (Point B on the diagram above). Cycle traffic on the road has significantly recently increased over the past two years, partly due to takeaway delivery riders from companies such as Deliveroo, who are often in a hurry. This proposal will direct lorries with limited vision to reverse into the path of cyclists using the through-route. If this application is approved it will only be a matter of time before we mourn a cyclist under a lorry in Baltic Street West.

Blockages to emergency vehicles and the Golden Lane Estate car park

This proposal will cause frequent traffic blockages in a busy and narrow cul de-sac with parking on both sides of the road. As there are no designated service bays for COLPAI, lorries waiting to unload or reverse will block emergency vehicles and residents wishing to enter the car park.

The large 'KEEP CLEAR' sign at the entrance to the Golden Lane Estate car park will be routinely breached. In the video above, a refuse vehicle is parked directly on the sign for over four minutes, and anybody wanting to drive into the Golden Lane Estate car park while bins are collected would have to wait over six minutes. It has been estimated that due to the difficulty of servicing COLPAI from Baltic Street West, deliveries could take 1-2 hours. If it is true, this could create a significant fire risk and traffic easily backing up onto Goswell Road.

In summary, the reversing maneuver will be impossible or extremely difficult to perform. Either way, it will encourage drivers to take dangerous risks. It would be optimistic to expect all drivers servicing COLPAI to have the expertise required to pull off the manoeuvre, or indeed have '4d vision' and watch concurrently for four hazards:

- 1) Motorcycles and couriers on one side of their vehicle (point A on the diagram above)
- 2) Vulnerable people emerging from Hatfield House (point C)
- 3) Cyclists that avoid Old Street emerging from Baltic Street West (point B)
- 4) Car drivers whose entrance into the Golden Lane Estate car park has been blocked (point E)

I also understand the school will have no on-site facilities manager to ensure safe collections or deliveries.

2) Creating a public nuisance for people living in Hatfield House

The proposal proposes industrial bins to be moved down a narrow corridor from a bin store at the rear of the school, where they will be left directly adjacent to the eastern accessible entrance of Hatfield House.

Poor door

This proposal will turn Hatfield House's only accessible entrance into a 'poor door'. Its residents - including the elderly, disabled and those with children in pushchairs who have no other access to the street - will be confronted with unpleasant sights, noises and smells from large bins at close proximity. It has been confirmed that the bins will contain food waste and human waste from soiled nappies. This will make life unpleasant for people entering, leaving or living next to the entrance in Hatfield House during summer months.



Leaving up to seven industrial bins in a confined space next to a residential flats is unsafe and represents a fire risk. If deliveries and collections to COLPAI have been greatly underestimated as appears to be the case, there is a likelihood of rubbish being piled up against bins, overspilling onto the street or Golden Lane Estate land when being transported to waiting collection vehicles, or being added to by motorcycle couriers waiting at the parking area opposite.

Residents have suffered the recurring problem of motorcycle couriers urinating by the Hatfield House entrance. It is likely that large bins left in this area will simply exacerbate this problem and create a 'public tip' in which to deposit rubbish due to lack of amenities in the area. This in turn risks attracting vermin, and inevitably lead to strained relations between the school and Hatfield House residents. It is hard to imagine a privately owned neighbouring development being subjected to such an anti-social planning application.

Increase in noise pollution

The proposal will also cause noise pollution in Baltic Street West to significantly increase due to ear-piercing reversing alarms of delivery/ collection vehicles, up to seven industrial bins being rattled along the ground and their bin lids being slammed. As COLPAI will have no dedicated service bays, residents can also expect running engine noise from delivery / collection vehicles, as well as other vehicles being held up by them. Disruptive levels of noise are already being generated around 8am each day from new bin lorry servicing arrangements (as can be seen from the video above) and this proposal will increase this exponentially.

Residents have been told deliveries and collections will take place "within school hours" but this will of course be of no comfort to residents who are retired, looking after children during the day, have babies requiring sleep during the day (Hatfield House second bedrooms used as nurseries face directly onto Baltic Street West) or increased numbers of people working from home due to changed work patterns following the Covid-19 pandemic.

Environmental pollution

The proposal will also increase air pollution for those living on or using Baltic Street West. Lorries servicing the school will inevitably leave engines running while contact with the school is established. Cars blocked from using Baltic Street West, including those unable to enter the Golden Lane Estate car park will also be discharging fumes until their route is cleared.

3) Failure to seriously assess other, safer, options for servicing the school

Two other options exist to service COLPAI more safely but have been repeatedly ignored.

Servicing COLPAI via Golden Lane

The safest means of serving COLPAI for the community would be for deliveries and bin collections to be made via the far wider Golden Lane, as worked perfectly well for the former Richard Cloudsley school on the same site, and as also planned for the residential block being constructed on the COLPAI site. However this has been rejected with little consideration and no evidence presented as to why it is "not viable due to the need to drag bins through the playground during school hours for collection."

It would beggar belief if solutions cannot be found to safely transport bins across a playground (for whether cordoning off the playground temporarily, or sweeping afterwards) that is not dramatically less dangerous than causing 7.5 tonne trucks to carry out three point turns at the end of a cul-de-sac in Baltic Street West in the path of pedestrians with mobility issues, motorcyclists, cyclists, and cars queuing to enter a car park.

Servicing COLPAI via Baltic Street East

Alternatively COLPAI could be serviced directly in front of its Baltic Street East entrance, where a lorry-sized space already exists. Trucks can enter Baltic Street East from Golden Lane with ease and drive directly into this position. They will only need to reverse slightly before exiting back onto Old Street via Domingo Street. Better still, demountable bollards could be installed so servicing vehicles would not have to reverse at all.

This is far less ideal than the obvious option of servicing COLPAI via Golden Lane, as many of the public nuisance issues highlighted above will continue to exist, and cyclists and motorcyclists will still be at risk, but would at least mitigate the danger of lorries reversing into pedestrians with limited mobility and blocking emergency or other vehicles.

I urge you to reject this deeply inaccurate and dangerous proposal. I understand no independent risk assessments have taken place with regards to its intentions to:

- direct lorries to reverse at the end of a busy cul-de sac, in the path of pedestrians with limited mobility and cyclists
- direct lorries towards a motorcycle courier parking and waiting zone being created as a result of a separate proposal, mention of which is omitted from this proposal
- Leave industrial waste bins in close proximity to an accessible pedestrian residential entrance
- block emergency vehicles while deliveries and collections take place.

This application has clearly not been thought through and betrays a disturbing lack of due diligence. Other respondents have revealed the application to be strewn with errors (including the swept path analysis diagram) and omissions that could mislead. As such I am sure those reviewing the application will not want to be culpable for accidents that will occur should this application be approved.

Paul Drinkwater
41 Hatfield House

Begum, Shupi

From: Sue Pearson [REDACTED]
Sent: 07 April 2021 14:56
To: PLN - Comments
Subject: Re: OBJECTION TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND LONDON BOROUGH OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679

My address is
21 Hatfield House
Golden Lane Estate
EC1Y 0ST

Sue Pearson
[REDACTED]
Sent from my iPad

On 7 Apr 2021, at 11:27, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

Dear Sue Pearson,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:
<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

Regards,

Shupi Begum
Planning Administrator
Department of the Built Environment
City of London Corporation
www.cityoflondon.gov.uk

<image001.jpg>
<image002.jpg>

From: Sue Pearson [REDACTED]
Sent: 29 March 2021 16:08
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>; planning@islington.gov.uk; Evans,

Subject: OBJECTION TO CITY OF LONDON PLANNING APPLICATIONS 20/00748 AND 20/00747 AND LONDON BOROUGH OF ISLINGTON APPLICATIONS P2020/2706 AND P2020/2679

City of London Corporation: 20/00747/MDC and 20/00748/MDC
London Borough of Islington: P2020/2679/AOD and P2020/2706/AOD
Former Richard Cloudesley School, Golden Lane, EC1Y 0TZ
(Islington letter ref 4296771 (43) and 429255 (44 & 46))

Dear Ms Evans and Mr Broomhall,

I object to the above applications for the following reasons:

COLPAI School (conditions 43 & 46)

Misleading information on school boundary: It was highlighted at the planning application stage that the waste bins could not be removed from the school site. Subsequent to the main applications being approved, a further application to remove part of the boundary wall was approved which will allow the bins to be moved out of the school premises onto Baltic Street West but will require a licence.

Location of bins awaiting collection: The applicant has consistently sought to leave the bins awaiting collection at the side of the school where they directly affect the front entrance to Hatfield House instead of moving them to the land, within the curtilage, at the front of the school. In the current proposal, bins are left on the land which is subject to a licence. Again, the boundary is not correctly shown. This considerably reduces residential amenity when the bins are moved, awaiting collection until the time that they are emptied and returned to the bin store.

Dangerous manoeuvres in Baltic Street West: The report of the consultant, Transport Planning Practice, confirms the concerns of residents regarding the safety of deliveries and waste collection in Baltic Street West, and confirms the much safer option of Baltic Street East and Golden Lane proposed by the residents.

The use of Baltic Street East: Again, the information offered at the planning application stage and throughout the planning process has been misleading with the bollards shown in the wrong location on Baltic Street East. The correct location is shown in the Section 278 extract attached. With this correct alignment, there is safe space for a vehicle to load and unload without blocking the highway and directly in front of the school. There is considerable space outside the school in the NE corner where bins can be stored for collection, if necessary, well away from Hatfield House.

Lack of adequate response to questions raised by residents: No information has been given on the precise source of the applicants claims. Table 5.1 lacks information about food and nappy waste collection and is vague about how many food deliveries are expected every day. There is no indication about how deliveries will be monitored, whether a banksman will be available for every delivery and what action will be taken if the frequency of deliveries exceeds the maximum agreed of 5 a day.

Changes of policy and lack of definition: In response to questioning, residents have been informed at consultation meetings of changes in policy with the preparation of food now being on site with no consequent change to the servicing and waste provision. There is no confirmation about the provision of banksmen at the school between 10.00 and 14.00 for deliveries. It is not reasonable to suggest delivery companies have a 2 man operation. There is no operational methodology for sequencing deliveries and how this will work with the existing business and domestic deliveries in Baltic Street West

Residential (condition 44)

There are similar concerns over the size and location of the bin store, which is likely to mean additional work from the building management team to stop fly tipping. The comparison with Golden Lane Estate's daily waste collection and bi weekly food and recycling waste does not stand up, and Golden Lane also has additional recycling, general and food waste bins along with other recycling facilities.

With online shopping and deliveries, particularly food deliveries for residents who may be housebound, there can be no restrictions imposed on tenants who could not be expected to pay for services that limit their ability to choose or shop economically on line by unenforceable time limits.

Regards,

Sue Pearson
Hatfield House resident

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<SCREENSHOT Section 278.png>

Begum, Shupi

From: Deborah Nielsen [REDACTED]
Sent: 08 April 2021 10:15
To: PLN - Comments
Cc: Devlia, Neel; Evans, Catherine
Subject: Re: P2020/2706/AO

Dear Shupi,
Thank you for letting me know.
My address is 42 Hatfield House, golden lane estate, ec1y 0su

Yours Deborah

On 7 Apr 2021, at 13:53, PLN - Comments <PLNComments@cityoflondon.gov.uk> wrote:

Dear Deborah Nielsen,

Thank you for your comments on the above Planning Application, please note we require your address.

Comments that do not include a name and address cannot be taken into account by a planning officer when considering an application nor can the comments be reported. For the purposes of data protection, we do not reveal the email address, telephone number or signature of private individuals. See the General Data Protection Regulations 2018 privacy notice.

Please could you respond with your details to: PLNComments@cityoflondon.gov.uk

Please visit our webpage for further information:
<https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/planning-applications/view-planning-applications/Pages/default.aspx>

Regards,

Shupi Begum
Planning Administrator
Department of the Built Environment
City of London Corporation
www.cityoflondon.gov.uk

<image001.jpg>
<image002.jpg>

From: Deborah Nielsen [REDACTED]
Sent: 28 March 2021 16:26
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Subject: P2020/2706/AO

I wish to lodge an objection rather than a comment. I wish to object to the inadequate DSP outlined for planning application P2020/2706/AOD

1. having bins left outside Our front door all year round, will be not only be an eyesore but also an attraction for flies and an unwelcome stink to endure each time I leave the building and coming home. I lived in Deptford before living in the city, where bins are left on the street, is disgusting.
2. This is a residential street, is bad enough having the motorcycle parking, the noise of some of the bike is rather loud, to top this with more traffic, noise and pollution and would in some cases have to reverse back, seems rather selfish and not thought through. Why install a seating area near Goswell road, if this will become more congested, not to mention the danger to pedestrians and cyclists when vehicles are turning or reversing. Why ? When options for all this traffic can be flowing through Baltic Street East, no need to reverse, no need for a 3 point turn. ? The most scary aspect is the many cyclists who comes through daily, with a van doing a 3 point turn, I can tell you now, is not if but when there will be an increase in serious accidents.

We as residents will have to witness this, as you are well aware this can be traumatic, even just the road rage that comes with near accidents.

Many cyclists are aware of the dangers of the Goswell/old street junction, so will cross through Baltic street west instead.

Why why why ? Bad planning.....? To allow life's to be compromised, as residents, cyclists and pedestrians. The Accidents and potential lives will be on your conscious. Don't regret this in 6 months time when life's has been ruined.

Please see sense.

Sorry for being dramatic, but this is madness and I need you to see that madness.

Yours sincerely Deborah Nielsen

Sent from my iPhone

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From: [Evans, Catherine](#)
To: [REDACTED]
Subject: FW: Waste and Recycling consultation
Date: 29 April 2021 16:53:59

From: Broomhall, Tom [REDACTED]
Sent: 28 April 2021 12:56
To: Evans, Catherine [REDACTED]
Subject: Waste and Recycling consultation

Hi Catherine

I met with the Council's waste and recycling officers this morning.

They have not raised an objection to the details however they did make a few comments.

Maybe this is more like an informative:

- Regarding the restrictions on the size of the vehicles to 7.5 tonnes for the school refuse collection, it is noted that this undertaken by a private contractor but if in the future if the Council were to take this on, the Council's vehicles are at least 18 tonnes and so wouldn't be able to comply with this restriction.
- It is noted that the Commercial Waste will be collected by a private waste collection and that there is no allocated space for refuse for the commercial units, so this would be via sacks left on street. The occupiers of the commercial units will need to make sure that they have arranged a legally compliant collection.
- For the residential which is undertaken by the Council, there is one waste collection a week. There would be fee for additional collections and the presence of this taking place historically elsewhere doesn't justify additional collections as this is a new build scheme.

Kind Regards

Tom Broomhall
Principal Planning Officer
Major Applications Team
Planning & Development
Islington Council
[REDACTED]

www.islington.gov.uk

Advice given at officer level is informal only, and is given without prejudice to any future decision by the Local Planning Authority.

Please note that in accordance with current Government guidance Officers will not be conducting face-to-face meetings or site visits. Applicants should provide comprehensive photographs of the relevant parts of a property and/or relevant views into and/or out of the site to enable a full assessment to be made.

All Duty Planning appointments will now be carried out via telephone. Please do not attend the Council Offices.



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and/or copyright protected.

From: [Evans, Catherine](#)
To: [REDACTED]
Subject: FW: CoLPAI Delivery and Service Plan - Response to Consultation Comments
Date: 29 April 2021 16:55:12

From: Broomhall, Tom [REDACTED]
Sent: 22 April 2021 17:12
To: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Subject: FW: CoLPAI Delivery and Service Plan - Response to Consultation Comments

Hi Catherine

Highways have confirmed no objections to the DSPs. See email below. He has quoted the wording of the condition.

Kind Regards

Tom Broomhall
Principal Planning Officer
Major Applications Team
Planning & Development
Islington Council
[REDACTED]

www.islington.gov.uk

Advice given at officer level is informal only, and is given without prejudice to any future decision by the Local Planning Authority.

Please note that in accordance with current Government guidance Officers will not be conducting face-to-face meetings or site visits. Applicants should provide comprehensive photographs of the relevant parts of a property and/or relevant views into and/or out of the site to enable a full assessment to be made.

All Duty Planning appointments will now be carried out via telephone. Please do not attend the Council Offices.



From: Dominy, Andrew <Andrew.Dominy@islington.gov.uk>
Sent: 22 April 2021 17:04
To: Broomhall, Tom <Thomas.Broomhall@islington.gov.uk>
Cc: Greenwood, Simon <Simon.Greenwood@islington.gov.uk>
Subject: RE: CoLPAI Delivery and Service Plan - Response to Consultation Comments

Hi Tom,

Highways can confirm that they have no issues with the arrangements for the service and delivery plan for either the school or the residential.

However the schools service and delivery plan should ensure,

Servicing should be between 10:00 and 14:00.

No vehicles larger than 7.5 tonnes.

A banksman should supervise all vehicular movements and in particular pay close attention to cycle movements. Cyclist dismount signs can be placed in both directions whilst servicing and delivery is in progress.

Regards

Andrew Dominy
Principal Highways Maintenance and Revenue Manager
Highways Maintenance
Public Realm
Islington Council

Postal Address:
Islington Public Realm
PO Box 2025
PERSHORE
WR10 9BU

www.islington.gov.uk

Follow us on Twitter@IslingtonBC and @IslingtonLife

Tel: 07825098398

E andrew.dominy@islington.gov.uk

Alternative contact: Julia Olinski 02075272000

www.islington.gov.uk

Location: <http://www.islington.gov.uk/images/environment/222us.jpg>

From: [Evans, Catherine](#)
To: [REDACTED]
Subject: FW: Former Richard Cloudesley School (20/00748/MDC and 20/00747/MDC)
Date: 29 April 2021 16:57:58
Attachments: [image001.png](#)
[image002.png](#)

From: Hindle Emily [REDACTED]
Sent: 12 April 2021 15:26
To: PLN - Comments <PLNComments@cityoflondon.gov.uk>
Cc: Evans, Catherine <Catherine.Evans@cityoflondon.gov.uk>
Subject: RE: Former Richard Cloudesley School (20/00748/MDC and 20/00747/MDC)

TfL Spatial Planning Reference: CITY/21/6 and CITY/21/7

Borough Reference: c and 20/00747/MDC

Location: Former Richard Cloudesley School Golden Lane Estate, EC1Y 0TZ

Proposal: (20/00748/MDC) Submission of Delivery and Servicing Plan for the school pursuant to condition 43 and 46 of planning permission 17/00770/FULL dated 19th July 2018. (ADDITIONAL INFORMATION HAS BEEN SUBMITTED) and (20/00747/MDC) Submission of Delivery and Servicing Plan for the residential/commercial parts of the development pursuant to condition 44 of planning permission 17/00770/FULL dated 19th July 2018. (ADDITIONAL INFORMATION HAS BEEN SUBMITTED)

Dear Catherine,

Thank you for re-consulting Transport for London (TfL) on the above application following the response from the applicant on TfL's original comments. For ease of tracking, I have provided TfL's new comments in red.

TfL's comments	Applicants response
TfL understands delivery and servicing, including refuse will take place on street from Golden Lane on an area of double yellow lines. In line with the Intend to Publish London Plan, deliveries and servicing should be made off-street, with on-street loading bays only used where this is not possible.	Due to not being able to utilise the Basterfield service road, there is no possibility of being able to service the site from an off-street location. The only other area where vehicles could park outside the carriageway would be within the undercroft access to the school. This area is to be heavily used by pupils and is therefore not appropriate for servicing vehicles. This has been the proposal since the application stage where the principal of this strategy was agreed. TfL queries if the undercroft area could be utilised for deliveries that occur outside of school operating hours. Where this is not possible the use of Golden Lane for the undertaking of deliveries and servicing appears acceptable in principle, however the boroughs opinion on this arrangement should be ultimately sought as the highway authority and any decision should take into consideration any safety implications and ensure the proposed arrangements will comply with Vision Zero, the Mayor's approach to eliminating all death and serious injury on London's transport network by 2041.
All vehicles servicing and delivering to the development must only stop/unload at permitted locations and within the time	Noted, this has been proposed in the DSP. Section 6.3.2 sets out how all delivery and servicing vehicles for the school will have to

periods permitted by existing on-street restrictions.	arrive between the hours of 10:00 and 14:00. Any vehicle not adhering to existing on-street restrictions would be subject to any penalties as per any other vehicle. This is welcomed. Existing on street restrictions should also be respected by those delivering to and servicing the commercial and residential units.
TfL strongly encourages the use of a delivery booking system to provide each delivery with a specific time slot. This should take into consideration the expected number of delivery/service vehicles and their anticipated dwell times. This will allow deliveries to be managed according to the capacity of the onstreet loading space and can help manage deliveries away from peak hours, minimising congestion on the local road network.	School deliveries will be monitored and managed as part of the DSP. All supplies will be delivered within the times stated in the DSP (10.00 – 14.00) and most regular suppliers will have a specified time slot, to avoid congestion in the same way as a delivery booking system. Deliveries for residents will be spread out across the whole day. Residents are likely to time any deliveries and servicing trips they have control of such as grocery deliveries, for when they are at home. This will help to encourage trips away from the peak hours. Residents can also make use of services such as Click & Collect and local collection points to help ensure deliveries are not missed. Most parcel deliveries made by van or cargo bike have very low dwell times (less than five minutes), therefore vehicle conflicts are unlikely. Appears acceptable in principle.
42 vehicular trips associated with the residential units and 7 for the commercial units are anticipated per day. TfL suggests the use of a Consolidation Centre where one location receives multiple deliveries from a variety of suppliers to minimise vehicle journeys to and from the site.	It is not considered feasible to use a dedicated consolidation centre for the site but CoL can investigate the use of a consolidation centre for the Golden Lane Estate in its entirety. However, the residents will be encouraged to choose retailers and suppliers who consolidate their deliveries. Similarly, the school, through its procurement policy, will seek to prefer suppliers that consolidate deliveries and also utilise electric vehicles or cycle logistics as part of their supply chain. CoL however will investigate whether a consolidation centre could be used as part of the wider Golden Lane Estate management. TfL would strongly welcome an investigation into the use of a consolidation centre for the wider Golden Lane Estate Management.

Since TfL was consulted on this application, it should be noted the London Plan was published in March 2021. This adds further weight to TfL requests and therefore the application should align with all policies set out in the London Plan.

I hope the above is useful. Please do get in touch if I can be of any further assistance.

Kind regards,
Emily

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[REDACTED]
