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25 August 2021

London Borough of Bexley  
Planning Department  
Civic Offices  
2 Watling Street  
Bexleyheath  
DA6 7AT

Dear Sir / Madam,

**Retrospective Planning Application - InPost Parcel Locker at Copelands, 280 Days Lane, Blackfen, Sidcup DA14 8PG**

I am instructed by my client InPost UK to submit a retrospective full planning application for the siting of an InPost Locker at the 280 Days Lane, Blackfen DA14 8PG.

This application has been submitted via the Planning Portal. This letter in conjunction with the enclosed application form, planning drawings and the requisite planning fee comprise the applicant's full planning application.

The planning application package comprises of the following:

- Location Plan ref. L(00) 001 P1;
- Existing Elevations ref. L(02) 001 P1;
- Proposed Plans ref. L(01) 101 P1, and
- Proposed Elevations ref. L(02) 101 P1.

In addition to the above enclosures, I will be grateful if you could take the contents of this letter into consideration.

**Background**

The InPost Locker was installed on 13 July 2021, on the understanding that this did not constitute operational development, or a material change of use, and therefore planning permission should not be required. Subsequently, a letter has been received dated 29 July from Katie O'Driscoll, Planning Enforcement Officer advising that the siting of the locker does, in the Council's opinion, require planning permission. This application therefore seeks to regularise the position in accordance with the advice from Ms Driscoll.

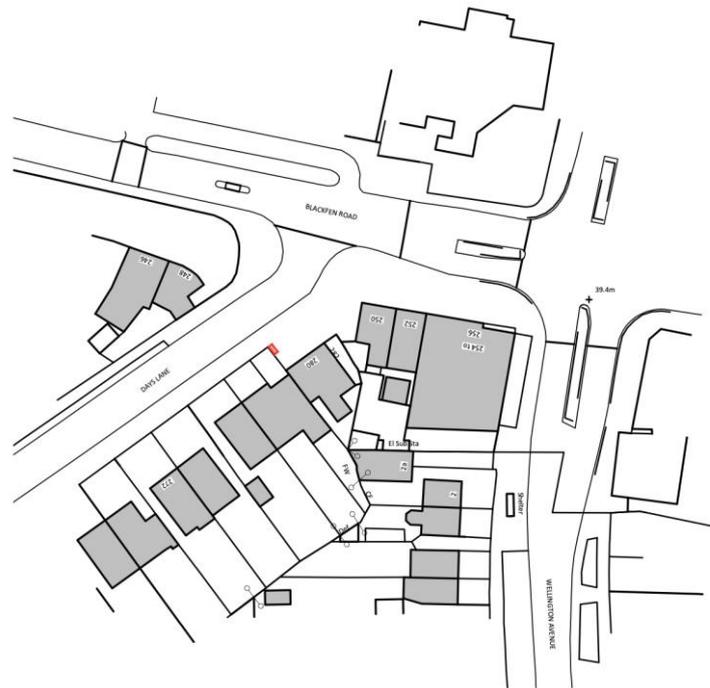
The details of the In Post Parcel locker are as follows.



DATE OF INSTALLATION	LOCKER DIMENSIONS		
	WIDTH	HEIGHT	DEPTH
13/07/20	2.011m	2.424m	0.919m

### Site Location

The InPost Locker is located within the curtilage of Copelands (280 Days Lane), a newsagent (Use Class E) located near the junction of Blacken Road (the Car Park, accessed via Avenue Road. The InPost Parcel Locker is positioned so that it is perpendicular to the shopfront, and adjacent to the boundary with 278A Days Lane.



**Figure 1- Site Location Plan**

The siting is shown in the photograph below.



**Figure 2 – Site Photograph**

The site is not located within a Conservation Area and there are no listed buildings within proximity to the InPost Locker. It is within the designated Blackfen District Centre.

### **Proposal**

This application seeks retrospective permission for the siting of an InPost Locker.

The material specifications of the locker are as follows:

- Base: steel zinc-coating (RAL 7016), painting and concrete B20;
- Lockers: magnelis/ stainless steel (RAL 7016);
- Roof: metal sheet roof and zinc-coating (RAL 9010);
- Locker door: magnelis/ stainless steel (RAL 9010);
- Shelves: stainless steel without coating/magnelis;
- External panels: magnelis/ stainless steel (RAL 9010); and
- Main door: galvanized steel (RAL 7016).

The Locker incorporates 3x integral CCTV cameras, two housed on the canopy and one in the touchscreen, to ensure customer safety and security. Further information on the specification of the InPost parcel lockers is provided in the Locker Overview information included at Appendix 1.

In terms of deliveries, Hermes carry out one delivery a day, during normal day time hours. On average, it takes the delivery driver 15 minutes to fill/empty a machine using a transit style van. In terms of customer usage, InPost data indicates that customers take 15 seconds on average to collect or return

a parcel. This demonstrates that both delivery drivers and customers will only be visiting the site for a limited time.

InPost Lockers provide a convenient way for customers to collect or return goods at a time which suits them rather than having to wait for goods to be delivered to their home or place of work. They offer many benefits in terms of sustainability, reducing the total number of trips required by both delivery drivers and customers, who often make 'linked trips' combining various activities with their collection, therefore reducing overall trip numbers. Further information on the sustainability benefits of the lockers is set out below and is contained within the Sustainability Benefits Statement included at Appendix 2.

### Relevant Planning Policy

The National Planning Policy Framework (NPPF), at paragraph 47 confirms that planning law requires that applications for planning permission be determined in accordance with the Development Plan, unless material considerations indicate otherwise. Section 12 of the NPPF provides a focus on achieving well designed places. The NPPF also sets out, at paragraph 11, the presumption in favour of sustainable development and as such, development proposals which accord with an up-to-date Development Plan should be approved without delay.

The Development Plan for Bexley consists of the following:

- The London Plan (2021)
- The Bexley Local Plan comprises:
  - Bexley Core Strategy (2012)
  - Saved policies of the Unitary Development Plan (UDP) 2004

### The London Plan 2021

**Policy T7 – Deliveries, servicing and construction** confirms that developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing. Paragraph 10.7.2 identifies that currently, many deliveries of non-urgent goods are made, unnecessarily, at congested times of the day. As many as two in every three delivery slots are missed, leading to repeat trips that cause additional congestion and emissions. Many van and lorry trips could be avoided or re-timed if freight activity were better consolidated. Paragraph 10.7.5 confirms that appropriate measures to address these issues include the installation of parcel boxes.

### The Core Strategy 2012

Unsurprisingly, it is understood that there are no policies contained within the Core Strategy which specifically relate to Click and Collect Lockers. Nevertheless, there are a number of general policies against which the application proposals should be assessed.

**Policy CS09 Using Bexley's resources sustainably** sets out the Council's support for proposals that seek to maximise the effective and efficient use of natural and physical resources whilst contributing to the health and well-being of the community and environment.

**Policy CS14 Town centre vitality and viability** states that the Council will maintain and enhance the vitality and viability of existing town [including district] centres and ensure that the scale and character of development is appropriate and of high quality design, in keeping with local context.

**Policy CS15 Achieving an integrated and sustainable transport system** advises that the Council will work to achieve a comprehensive, high quality, safe, integrated and sustainable transport system, and to improve the efficiency - and promoting the sustainability - of freight movement in the borough.

**Policy CS16 Reducing the need to travel and the impact of travel** confirms that that Council seek to minimise the distances people travel thereby reducing the time, cost and environmental effects of transportation.

#### The UDP 2004

The Council continues to rely upon saved UDP policies considered to be in general conformity with the London Plan which have not been replaced by the Core Strategy 2012. The following is relevant.

**Policy ENV39 Built Environment** sets out the Council's requirement for new development, which should, inter alia, be satisfactorily located and of a high standard of design. It should be compatible with the character of the surrounding area and should not adversely affect the street scene.

### Key Planning Considerations & Assessment

#### Principle of Development

Policy T7 of the London Plan specifically encourages the provision of parcel lockers as an identified measure to ensure more efficient deliveries, improve sustainability and reduce congestion. The locker is located on an existing commercial site and given its scale and intensity of use will not result in a material change of use on the site. The principle of development is therefore considered to be acceptable.

#### Design

In terms of size, the locker measures 2m in width and 1m in depth. It has a maximum height of 2.42m. It is therefore a modest structure that is not out of keeping with the street furniture and other structures seen within a commercial setting, as found outside forecourt frontages nearby, including totem signage (including at the application site), bins, and the prevalence of off-street parking outside these premises.

In terms of design, InPost lockers are designed in a high-quality format to be specifically suited for the needs of the customers both in terms of ease of operation and security. The design specification provides high quality materials, with the locker being specified in Magnelis / Stainless Steel, chosen specifically to provide the optimum levels of corrosion resistance for long term durability.

The neutral colour scheme finish of the InPost locker, with limited, yet clean and simple branding is also deliberately chosen to ensure ease of recognition and use by the customer, whilst minimising any adverse visual impacts through 'over-cluttered' branding or unsympathetic colour choices. The appearance of the InPost locker because of this neutral colour scheme, clean, simple and unobtrusive branding and uncluttered user-friendly style is therefore reflective of its function. It represents a modern, clean, simple, user friendly and functional design finished in high quality materials specified for durability, longevity and security.

The character of the area is defined primarily by the District Centre on Blackfen Road and at the junction of Days Lane, with its associated shopping frontages within 2 – 3 storey properties, wide pavements,

street furniture and off-street car parking outside the premises. Properties along Days Lane, beyond the junction, are residential, comprising semi-detached and two storey housing.

The locker is considered to be in keeping with the commercial character of the host site and the District Centre of which it forms part. It is not an incongruous, or alien feature in the street scene, but rather is located on an existing commercial site, and is of a scale that is in keeping with its host site. In this respect, the locker is integrated with its local character.

In this regard, the locker is a high-quality functional structure which has been appropriately located on an existing commercial site. It is therefore considered to be of a high standard of design, that respects the existing character of the area. It is not considered to have a harmful impact on the character and appearance of the area. It is in accordance with Policies CS09, CS14 and ENV39.

### Amenity Impacts

The locker is located on the forecourt of an existing retail shop. It is positioned perpendicular to the shopfront, adjacent to the boundary wall and the driveway of 278A Days Road. In this respect, it is not considered the locker will have any detrimental impact on the visual amenity of no. 278A. The use of the locker and associated activity will not be significant in relation to the existing use of the host site. Overall, it is not considered that the locker will give rise to significant adverse impacts on residential amenity.

### Security

The locker incorporates CCTV within its structure, to ensure the safety and security of customers.

### Highways

Hermes carry out one delivery a day, during normal day time hours. On average, it takes the delivery driver 15 minutes to fill/empty a machine using a transit style van. In terms of customer usage, InPost's data indicate that customers take 15 seconds on average to collect or return a parcel. This demonstrates that both delivery drivers and customers will only be visiting the site for a limited time and therefore there is no adverse impact on the highway network.

### Sustainability Benefits

Central Government has acknowledged the importance of Click & Collect facilities generally, including Parcel Lockers, which are recognised by the Government as important logistical facilities that meet the needs of retailers and consumers in today's dynamic retail environment.

InPost parcel lockers can achieve significant sustainability benefits which can be summarised as follows:

- Reductions in CO2 emissions
- Reduced congestion
- Reduced delivery mileage
- Air quality improvements
- Encouraging linked trips

InPost Parcel Lockers contribute to sustainability objectives by enabling multiple deliveries to one single location which is of direct benefit to the road network by helping to reduce trip generation and congestion in the wider area, with resultant environmental benefits.

The location of the lockers also allows for the combination of collection of goods with the use of the other services and facilities (linked trips). In this case, with commuters using the nearby Bexleyheath Station. Not only does this reduce the number of trips in total by both delivery driver and customer, but it also enables a more efficient use of the 'host' site and can support the longevity and vitality of the existing site or location.

InPost Lockers provide a convenient way for customers to collect or return goods at a time which suits them rather than having to wait for goods to be delivered to their home or place of work. They offer many benefits in terms of sustainability, reducing the total number of trips required by both delivery drivers and customers, who often make 'linked trips' combining various activities with their collection, therefore reducing overall trip numbers.

The proposal therefore accords with Policies CS09, CS15 and CS16.

Further information on the sustainability benefits of the lockers is set out in the Sustainability Benefits Statement included at Appendix 2.

### **Summary & Conclusion**

After consideration of the relevant policies, it is demonstrated that this retrospective application for the siting of an InPost Locker is policy compliant and is therefore acceptable in planning terms. There is therefore a compelling case for the granting of permission without delay.

I trust that the enclosed information is sufficient to enable you to validate the application and look forward to receiving your confirmation in due course. Please contact the undersigned in the first instance should you require any further information.

Yours sincerely

*Neil Jones*

**Neil Jones**  
**BA (Hons) DipTP MRTPI AssocRICS**  
**Director**

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cc Mr G Brice – UK Locations Director, InPost UK

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