



Planning Services
Bath and North East Somerset Council
Lewis House
Manvers Street
Bath
BA1 1JG

By email
development_management@bathnes.gov.uk
let.009.LB.JF.27350021

30 September 2019

Dear Sir / Madam,

**FURTHER REPRESENTATIONS TO APPLICATION REF: 19/01854/OUT
HARTWELLS OF BATH, NEWBRIDGE ROAD, NEWBRIDGE, BATH, BA1 2PP**

We write on behalf of Standard Life Assurance Limited in response to Walsingham Planning's (the Agent) email dated 12 September 2019, and further to our earlier representations dated 15 June and 5 July 2019.

The approach that the Agent has detailed, with regard to the servicing arrangements for the proposed development, is impracticable and unrealistic. The applicant fails to provide sufficient details to demonstrate that the proposed arrangements will be enforced and properly managed. As a result, the proposal could have a detrimental impact on the operations of the Maltings Industrial Estate. Therefore, as per Dan Friel's (Senior Highways Development Control Engineer) comments dated 20 August 2019, the servicing strategy should be comprehensively reviewed before any planning decision is made.

The Agent has stated that this level of detail regarding access is not normally required at this stage of the planning process. However, access is being dealt with as part of the outline application (i.e. it is not a matter reserved for future determination) and it relates to access over third party land. Therefore, the applicant should provide sufficient information to demonstrate that the access through the Maltings can be provided, and function satisfactorily, without impacting on the operation of the industrial estate.

Comments

We respond to the Agent's comments below:

"Residents expecting large deliveries can be asked to arrange this through the management team and instructed that this must occur via the Maltings entrance. It is not unusual for a site to have a separate delivery access, it will come down to ensuring it is properly managed e.g. ensuring that this information is provided to the delivery companies."

This approach does not ensure that delivery companies will receive the relevant information and instructions to use the Maltings entrance for large deliveries. The applicant should provide details of how this will be enforced and managed in practice, and how the management team will ensure that this is complied with by delivery companies.

"Larger deliveries and servicing will be regular trips managed by the site team (e.g. bin collections, maintenance vehicles, furniture deliveries) so these can be instructed to use the Maltings entrance. Historically contractors (such as Biffa) have known how access is achieved and they have a fob, everyone understood in the past and there is no reason to suggest the same would not continue in the future."

The scale and type of development proposed at the site, and the operations that will be taking place, are significantly different to that of the previous situation. Therefore, it cannot be assumed that contractors and delivery companies will automatically know how deliveries and servicing should be managed. Details should therefore be provided setting out how the servicing access will be made available at all times, how access across the Maltings Industrial Estate would be secured, and how delivery drivers would know how and where to access the site from.

"The management could easily produce a short delivery instruction note with a map/plan, directions and any codes required, which could be issued in advance of servicing."

Whilst a delivery instruction note could help to explain the access and servicing arrangements to the delivery and servicing companies, the applicant has not provided details of how this information would be made available or how the instructions would be enforced and managed. This should be clarified to make it clear how these processes will be controlled. Unless these arrangements are made clear to the relevant companies, servicing and deliveries will be uncontrolled, and it is unlikely that they will be complied with.

Conclusion

In summary, these comments seek to highlight that the applicant has still not provided sufficient information to demonstrate that the proposed servicing and deliveries access through the Maltings can be provided, and function satisfactorily, without impacting on the operation of the industrial estate. We therefore request that further detail is provided by the applicant if officers are minded to recommend the application for approval.

Please notify us of any relevant consultation responses that are received during the remainder of the determination period. We would also appreciate if you could let us know when a committee date for this application has been confirmed. If you have any queries, please do not hesitate to contact us.

Yours faithfully,



Louise Bending

cc: Mr A Roberts – Aberdeen Standard Investments