



NL Jones Planning
Duke House Business Hub
Duke House
Skipton
BD23 2HQ
07774 652426
www.nljonesplanning.com

9 September 2021

Gravesham Borough Council
Development Management
Civic Centre
Gravesend
Kent
DA11 1AU

Dear Sir / Madam,

Planning and Listed Building Applications - InPost Parcel Locker – Gravesend Railway Station, DA11 OHP

I am instructed by my client InPost UK to submit planning and listed building applications for the siting of an InPost Locker at Gravesend Railway Station, DA11 OHP.

The applications are submitted via the Planning Portal. This letter, in conjunction with the enclosed application form, planning drawings, supporting documentation and the requisite planning fee, comprise the applicant's full application.

The planning and listed building 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;
- Proposed Elevations ref. L(02) 101 P1;
- Design and Access Statement, and
- Heritage Statement

In addition, a further detailed specification of the locker is provided in the **Locker Overview** included at **Appendix 1** of this letter, and the **Sustainability Benefits Statement**, at **Appendix 2**, provides information on the sustainability benefits of the lockers, principally by reducing overall trip numbers and associated improvements in air quality.

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. 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.

A full review of national and local planning policies, which are considered relevant to the assessment of this proposal, is provided within the supporting documentation.

Key Planning Considerations and Assessment

Principle of Development

The locker will be located at a principal public transport hub 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 and Heritage Impacts

The design and its associated impact on its immediate locality and the identified heritage asset is fully appraised in the accompanying Design and Access Statement and Heritage Statement.

It is concluded that the proposed locker is a high-quality functional structure which has been appropriately and sensitively located on an existing commercial site, with no harmful impact to the character and appearance of the area, or the significance of the Grade II listed building. It therefore fully accords with relevant policies, including Policies CS19, CS20 and TC2.

Amenity Impacts

The locker is not situated in close proximity to any residential properties upon which it may give rise to adverse amenity impacts.

Security

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

Access and Highways

An appraisal of access considerations is provided within the Design and Access Statement, which confirms the InPost Parcel Locker will be fully accessible to all users. Nor will the locker impact on access to existing facilities and services offered at the 'host site'.

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). 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 Policy CS10 and CS18.

Summary & Conclusion

After consideration of the relevant policies, it is demonstrated that this planning and listed building 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
BA (Hons) DipTP MRTPI AssocRICS
Director
 NL Jones Planning
 E / neil.jones@nljonesplanning.com
 M / 07774 652426

cc  UK Locations Director, InPost UK

Enc

APPENDIX 1

Locker Overview Information

Gravesham Borough Council

InPost – Locker Overview



Tried and Tested, Reliable and Secure Construction

Our off-the-shelf lockers range from 2m-6m long (typically 4m-6m), with option to extend to 260 compartments

Roof with 2 cameras
(version with or without
roof and cameras)

**Fully outdoor, tested in
a climate chamber**

**Shock and flood
sensor**

Polymer concrete base

DIMENSIONS/WEIGHT

Width	2011 mm
Height	2221-2424 mm
Depth	919 mm
Weight	~900 - 1000 kg

Standard locker module

- **Small boxes:** 89 x 410 x 667 mm
- **Medium boxes:** 171 x 410 x 667 mm
- **Large Boxes:** 385 x 410 x 667 mm

Optional equipment

- Banner with backlight
- Label and receipt printer

Media equipment

- 12.1 inch vertical touch screen



We have 26 Pre-Defined Locker Layouts, like the Below

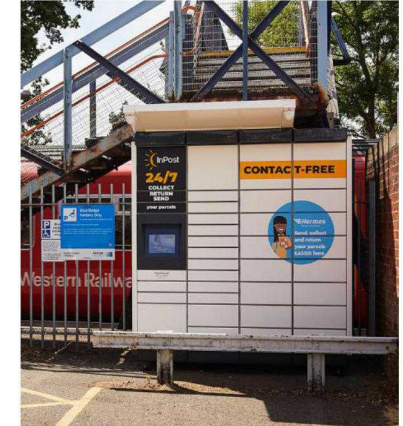
These are based on years of proprietary analysis of parcel mix

L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L	L		
S	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M
serv. compart.	S			S	S			S	S			S	S			S	S		
	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M
	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M
	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M
	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M	S	S	M	M
L	M	M	M	L	M	M	M	L	L	L	L	L	L	L	L	L	L	L	L
M	M	M	M	M	M	M	M	L	L	L	L	L	L	L	L	L	L	L	L
NFM				AFMM				AABB				GGBB				FFBB			
L: 5	M: 16	S: 14	LMS: 35	L: 5	M: 16	S: 20	LMS: 41	L: 8	M: 10	S: 20	LMS: 38	L: 8	M: 14	S: 12	LMS: 34	L: 6	M: 14	S: 20	LMS: 40

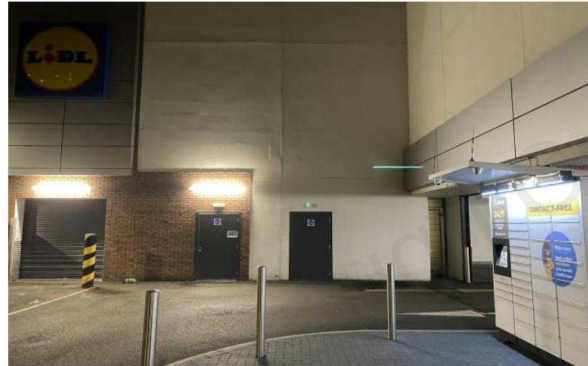
Locations –Rail



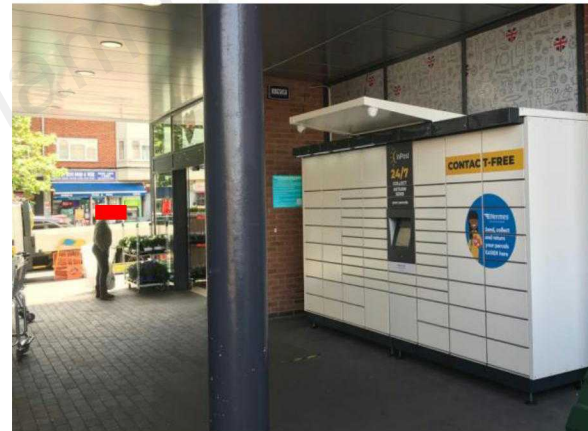
38 stations:
c.78,000 passengers
41 million entries &
exits per year



Locations – Retail



62 stores, including all
London:
c.300,000 weekly footfall



Locations – Forecourt and Independents



Kingston



Dulwich



Marylebone



Watford

APPENDIX 2

Sustainability Benefits Statement

Gravesham Borough Council

InPost Parcel Lockers – Sustainability Benefits Statement

Prepared by NL Jones Planning on behalf of InPost UK.

Introduction

This statement has been prepared in support of a planning application for the siting of the InPost parcel locker.

It is important to identify the key sustainability benefits that InPost parcel lockers can achieve, as these benefits constitute a material consideration that should be given significant weight in favour of the application.

Key Sustainability Benefits – Greener Delivery

The importance of Click & Collect facilities such as the InPost parcel lockers are recognised by Government as an important and legitimate facility that meets the needs of consumers in today's dynamic retail environment.

Parcel deliveries are a major contributor of harmful emissions, congestion, and road accidents in the UK. The key benefit of InPost parcel lockers is that rather than driving from one home to the next, couriers cover fewer miles by delivering multiple parcels in a single trip.

InPost Lockers are available 24/7, so parcels are always delivered first time. This means no wasted journeys or extra trips for re-deliveries. If more parcels are delivered to lockers, we would have fewer vans on our roads and only a 1/3 of the emissions.

With more and more of us going online instead of heading out to the shops, there are more delivery vehicles on the roads than ever before. As a result, congestion and transport-related emissions have risen significantly, particularly in cities with large populations where grid-locked roads have become the norm. At the same time local Councils are working hard to reach cleaner air targets and lockers help reduce CO2 emissions by up to two-thirds compared to home delivery.

As the popularity of online shopping is unlikely to wane anytime soon, change is needed to prevent a continued toll on the environment. Traditional home delivery involves couriers delivering individual parcels to individual households, whereas locker delivery enables couriers to deliver multiple parcels to a single location. This means couriers can spend less time travelling from home-to-home and make their journeys more efficient (e.g., one stop with 50 drops versus 50 different stops). Locker deliveries also do not rely on people being in to receive their parcels. Parcels can be delivered first-time without any need for second and third delivery attempts, or trips to depots when parcels cannot be delivered. These changes alone could cut CO2 emissions by up to two-thirds.

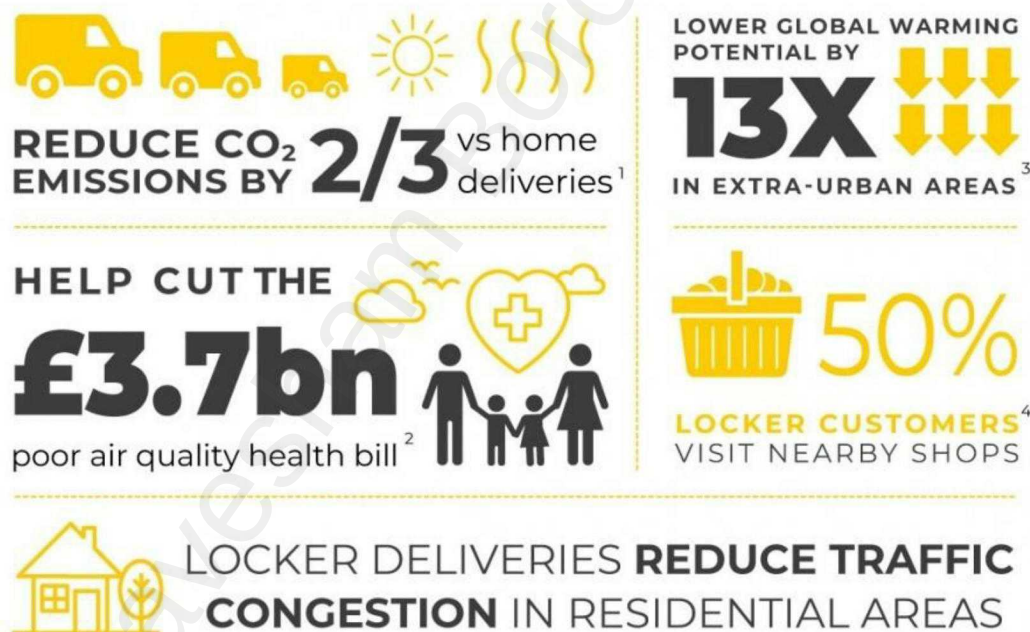
Locker delivery has also been shown to reduce mileage on the road by up to 95% per parcel compared to home delivery, reducing its contribution to global warming by 3 times in urban areas. This increases to 13 times within extra urban areas.

Air quality is another area that lockers can help to improve. Nitrous oxide from road vehicles has been on the decline since 2010, but the proportion from vans has kept on increasing. If parcels are grouped into locker drops, we can help to clean up the air which costs the UK a projected £3.7bn annually in health impacts.

By placing lockers on the route to where people work, shop and play, InPost is encouraging customers to make more out of their existing journeys (trip chaining or linked trips), rather than making separate trips. This in turn reduces their carbon footprint and lowers emissions and exposure to road related pollutants.

InPost research shows that very few people make designated car journeys to collect items at a locker. One recent study (on customers who collected or returned parcels from InPost Lockers outside Lidl stores) found that 31% travelled by bicycle or on foot to the locker. 61% went by car or motorbike, but almost half (47%) of those shoppers also visited the Lidl store – thereby turning what could have been two trips into one.

Figure 1 – Key Sustainability Benefits



1. Barton Wilmore, 2019. 2. Walton et al. 2015. 3. Giuffrida et al. 2016. 4. InPost 2020.

Summary and Conclusions

InPost parcel lockers can therefore 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

The InPost Parcel Lockers contribute to sustainability objectives by enabling multiple deliveries to one single location which is of direct benefit to the road network in terms of helping to reduce congestion in the wider area with resultant environmental benefits as identified above.

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). 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.

These benefits are therefore important material considerations in favour of the planning application which should be given significant weight.