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13 January 2023

Copeland Borough Council
Market Hall
Market Place
Whitehaven
CA28 7JG

Dear Sir / Madam,

Planning Application - InPost Parcel Locker – Co-op, 42 Main Street, Egremont, CA22 2AD

I am instructed by my client InPost UK to submit a full planning application seeking planning permission for the siting of an InPost Locker at Co-op, 42 Main Street, Egremont, CA22 2AD.

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:

- Site Location Plan ref. L(00) 001 P1;
- Existing Plans ref. L(01) 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.

Site Location

The InPost Locker will be located to the front (west) elevation of the store facing onto the forecourt area and Main Street. The locker will be within the recessed area created by the overhanging eaves. It will replace existing shop display units.

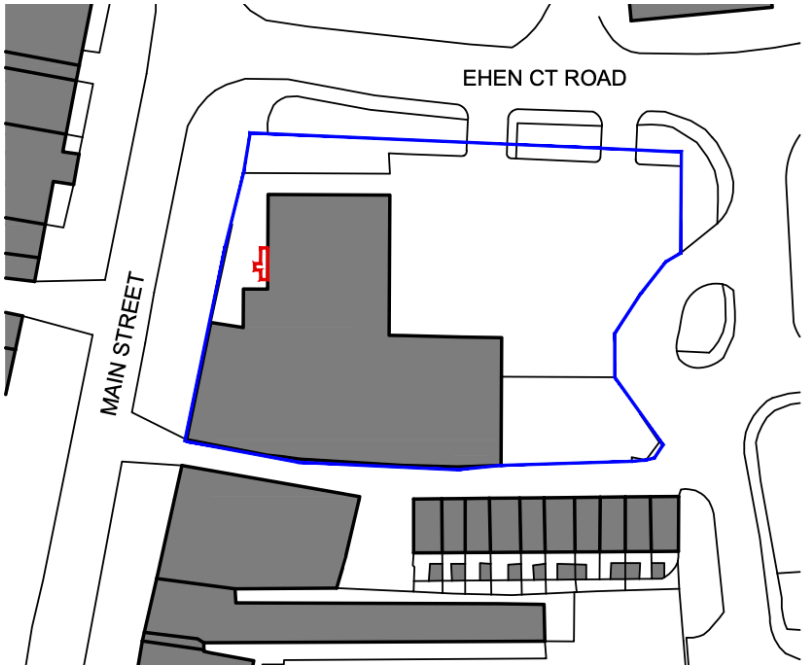


Figure 1- Site Location Plan

The proposed location is shown in the photograph below.

Figure 2 – Site Photograph (Source: Google Map)

The existing building is not listed. The site is, however, in the Conservation Area.

Proposal

The details of the InPost Parcel Locker to which this application relates are as follows.

LOCKER DIMENSIONS		
WIDTH	HEIGHT	DEPTH
3.939m	2.424m	0.919m

The material specifications of the locker are as follows:

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

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 Copeland Borough Council comprises the Core Strategy and Development Management Policies 2013-2028 Development Plan Document (adopted 2013) and saved policies of the Copeland Local Plan 2001-2016.

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

Core Strategy and Development Management Policies DPD

Policy ER7 Key Service Centres Roles and Functions confirms that a development objective for Key Service Centres is to protect and enhance the services provided.

Policy T1 Improving Accessibility and Transport states that the Council will support transport improvements that maximise accessibility for all modes of transport.

Policy ENV4 Heritage confirms the Council will maximise the value of the borough's heritage assets by protecting listed buildings, conservation areas other features of historical value**.**

Policy DM10 Achieving Quality of Place advises that new development should achieve a high standard of design. It should respond positively to the character of the site and its wider setting in terms of proportion, scale, massing and materials; consider risks of crime and antisocial behaviour; and, create and maintain reasonable standards of amenity.

Policy DM22 – Accessible Developments confirms that new development should be accessible to all users.

Policy DM27 Built Heritage and Archaeology advises that development that protects, conserves and where possible enhances the historic, cultural and architectural character of historic sites will be supported. In Conservation Areas the Council will consider how a proposal impacts on the existing architecture, historic associations and quality of the townscape.

There are no 'saved' policies of the Local Plan 2001-2016 relevant to this proposal.

Key Planning Considerations & Assessment

Principle of Development

The locker is located on an existing commercial property 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 4m in width and 1m in depth. It has a maximum height of 2.42m. Its height, depth and width are therefore in keeping with the existing structures on site.

In terms of design, InPost lockers are constructed 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 dark 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 primarily defined by a mix of commercial uses located within the ground floor of two and three storey, attractive period properties. The Co-op includes a modern extension.

The locker will be located on an existing commercial site. It will be discreetly located underneath the canopy of the roof structure and is set well back from the street, behind a dwarf wall. Other structures include a trolley bay, display units, signage, planters and other street furniture. The locker is therefore

in keeping with the existing commercial use of the host property and surrounding area generally, which includes other structures within the forecourt area (some of which will be replaced by the locker) of the Co-op (some of which will be replaced by the locker) and elsewhere. In these terms, 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 the adjacent structures. In this respect, the locker is integrated with its local character.

In this regard, the locker is a high-quality functional structure which is appropriately located on an existing commercial site. It is 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 nor the conservation and preservation of the Conservation Area. It is in accordance with Policies ENV4, DM10 and DM27.

Amenity Impacts

The locker is situated within an existing commercial shopping frontage. It is not located in close proximity to any residential properties upon which it may give rise to adverse amenity impacts and is thereby in accordance with Policy DM10.

Security

The locker incorporates CCTV within its structure, to ensure the safety and security of customers. This satisfies Policy DM10.

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 in accordance with Policy T1 and DM22.

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 ER7, T1 and DM22.

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 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

[redacted]

Neil Jones
BA (Hons)DipTP MRTPI AssocRICS
Director
NL Jones Planning
[redacted]

cc Mr G Brice – UK Locations Director, InPost UK

Enc

APPENDIX 1

Locker Overview Information

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

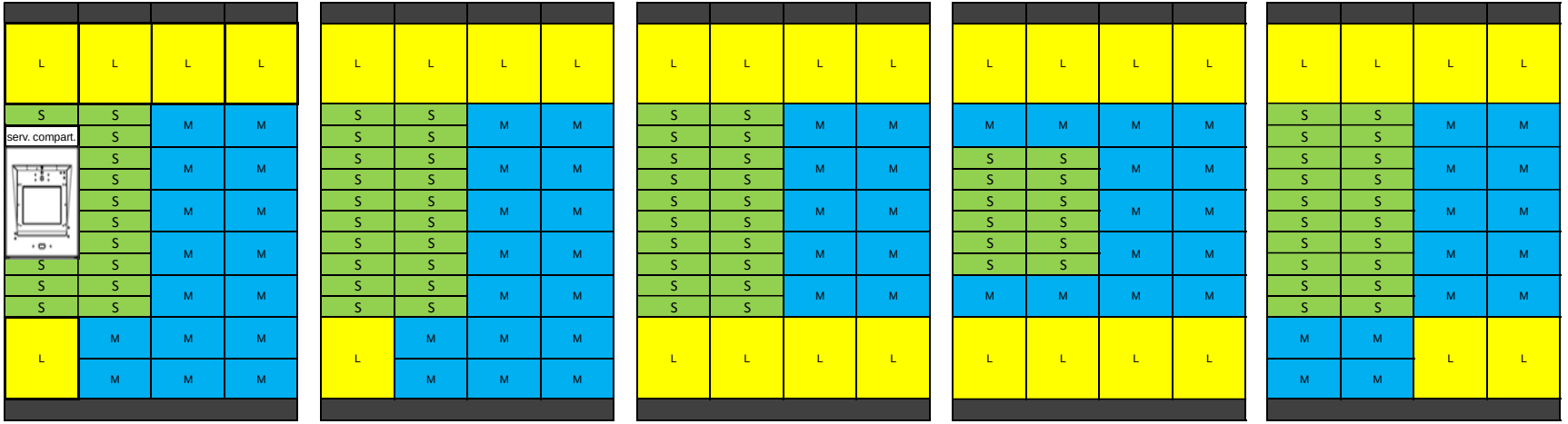
Media equipment

- 12.1 inch vertical touch screen

Source: InPost

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

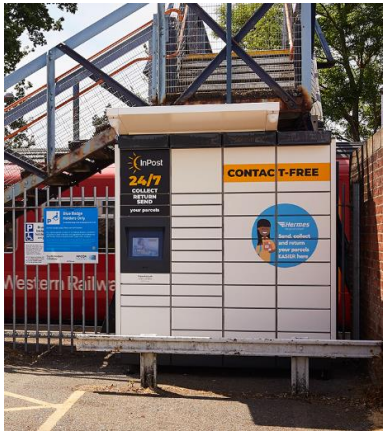
These are based on years of proprietary analysis of parcel mix



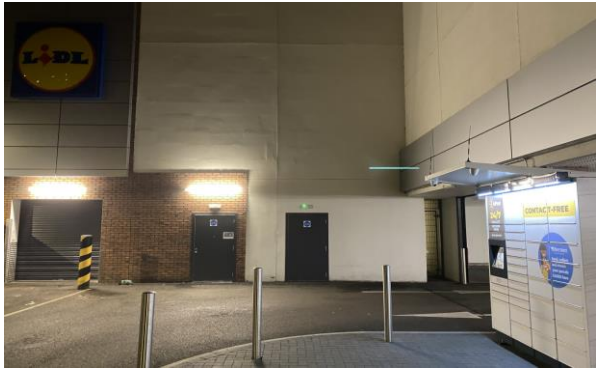
Source: InPost

Locations –Rail

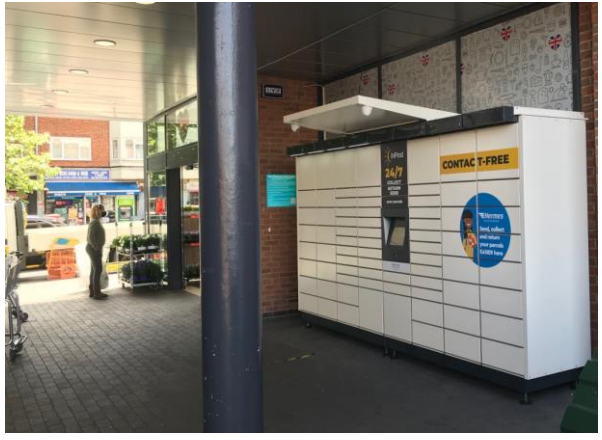
38 stations:
c.78,000 passengers
41 million entries & exits per year

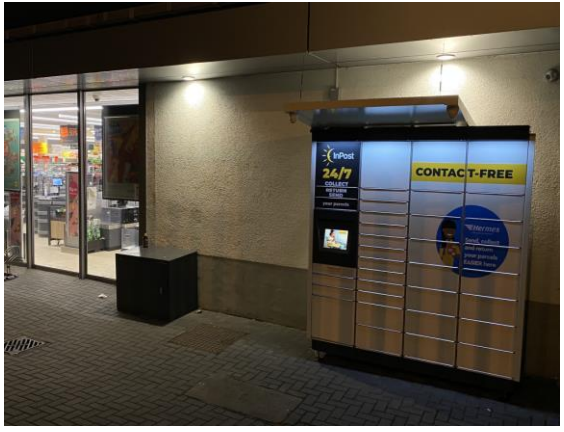


Locations – Retail



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





Locations – Forecourt and Independents

Kingston

Dulwich

Marylebone

Watford

APPENDIX 2

Sustainability Benefits Statement

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.

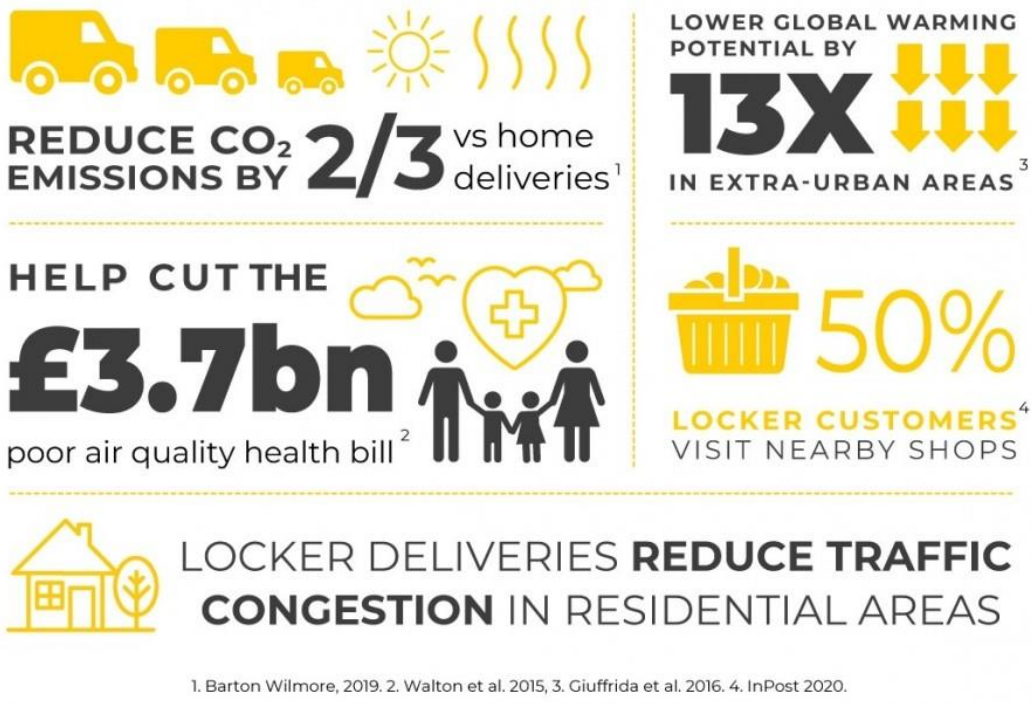
Locker delivery has also been shown to reduce mileage on the road by up to 95% per parcel compared to home delivery, reducing its contribution to global warming by 3 times in urban areas. This increases to 13 times within extra urban areas.

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



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.