[redacted]

Hi Jenni,

Please see attached revised car parking plan with swept-path analysis.

I also attach the LHA response for reference and hope to provide clarity to overcome any potential concern. I will follow the headings set out by the LHA for ease.

Access

The attached plan indicates suitable visibility splays at the site, in accordance with TAN18 and best practices. Furthermore, it is worth highlighting that this is the exact same access that has been used historically by the former distribution centre.

The LHA reference the existing lay-by which fronts the access and runs parallel with Watery Road, however, this portion of land does not form part of the application site. The location plan indicates that the 'red line' does not incorporate this area. It seems unreasonable for the LHA to suggest that it would be the applicant's responsibility to close this adopted lay-by and construct an extension to the existing active travel route to the East of the site.

The LHA assumption regarding internal access is somewhat correct. There are means for manoeuvrability through the site to access Dolydd Road to the West. However, in reality, this is unlikely to be a realist route for customers of the proposed unit. Given the proximity of the proposed car parking and retail unit to the access of Watery Road, it would be highly unlikely for customers to access the site via Dolydd Road.

The LHA note that the existing B2/B8 units further to the South of the application site would be 'undeveloped'. Again, these units do not form part of the application, however, I appreciate that the proposal may have a perceived impact on the existing use of the site. In planning terms, the use of the site currently would be considered B2/B8 and owing to this lawful use, the fallback position should be assessed against this. I am unaware of any controls that the LPA/LHA would have were a new operator found to utilise the site in this manner. By means of brief example, the site could be used by a large distribution company (e.g Amazon) whereby the number of vehicles, deliveries, manoeuvrability would not be controlled. The attached plan indicates the proposed layout associated with the Greggs site (within the red line) and demonstrates that there would be sufficient space for alternative uses across the wider site, without one class-use impacting the other.

The final paragraph relates to a 'live' planning application (P/2025/0264 - I think Tyler Fox is the planning officer for this application). My understanding that the referenced planning application, in the adjacent unit was submitted in March 2025, and there has been no update since July 2025. It would be extremely unfair that a planning application which seems to be stagnant would jeopardise this planning application. There seems to be valid justification for each of the applications (and uses) to coincide with each other.

Traffic Generation

Whilst a formal assessment has not been undertaken, presumably the number of vehicular trips would be less than the current lawful use of B2/B8. Again, it is worth highlighting as noted within the planning statement that the target demographic is those already situated near the site, such as the various workers associated with the Hospital and University Campus, therefore, it is considered that the majority of trips would be on foot.

Parking and Turning Provision

The attached plan indicates 7no. car parking spaces, including a disabled bay. The LHA seems to distinguish between use-classes of A1 and A3. Typically, Greggs operate within the A1 Class Use, as confirmed by case law. However, the reason for applying for a mixed use is that the proposal includes a small-scale seating area, and some local authorities believe that a mixed use is the best approach. In usual circumstances Greggs would be seen as an A1 retail unit, whereby the requirement for car parking is less than that of A3. Nevertheless, the proposed level of car parking is considered acceptable and in accordance with LDP policies which outline a maximum requirement.

Ample space is available at the site which can comfortable and suitably accommodate cycle storage provisions. The applicants would be open to a suitably worded condition to secure this.

The dimensions of the largest vehicles are included within the attached plan. Similarly, swept path analysis is provided for the largest vehicle to demonstrate that delivery vehicles can comfortably manoeuvre and turn within the site, in a similar manner to the exiting situation whereby large delivery vehicles associated with the B2/B8 units turn within the site.

Should the LPA wish to condition delivery times, the applicant would be open to negotiating a suitably worded condition restricting delivery times outside of the operational hours of the retail unit, therefore undertaken at a time where there are likely to be less vehicles using the site and highway.

Waste and Recycling

The servicing, including waste collection will be undertaken is a similar manner to that indicated via the swept path analysis. The collection of refuse and recycling will be managed by a private operator.

Ample space is provided internally and externally (to the North side of the building) for the storage of refuse and recycling.

In conclusion, the attached plan demonstrates that the visibility, car parking and manoeuvrability at the site is acceptable and accords with the relevant LDP policies. The strong fallback position of the existing lawful use of the site as a distribution centre must be given considerable weighting in the determination of the acceptability of the proposal. This proposal allows the LPA/LHA some control via suitably worded conditions to manage the highway matters at the site.

Should the LPA wish for example conditions to be submitted, we can provide this, if required.

On balance, the proposal would give rise to a significant betterment to the highway related matters at the site by virtue of additional control, and it is considered that the proposal accords with all requirements of the LDP policies, TAN18, SPG's, and best practices.

Therefore, we kindly request that the officer look favourably upon the proposal and positively determine the application.

[redacted]