

Development Management Team
Town Hall Extension
Argyle Street
London WC1H 8ND

14th April 2014

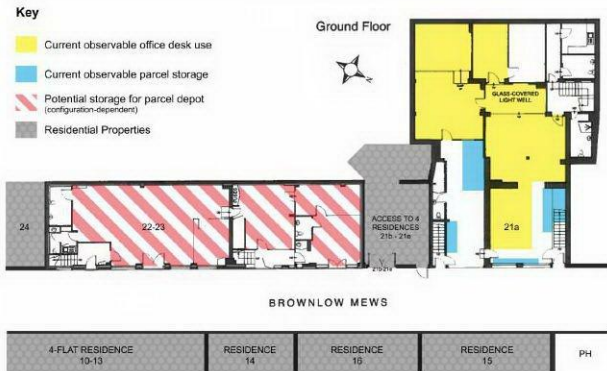
Dear Sirs,

Re: Application ref. 2014/1621/P

In response to the planning application for a change of use of premises at 21a and 22/23 Brownlow Mews, London WC1N 2LA, I request that this be rejected.

Changing the usage of both areas within 21a and 22/23 will give a green light to further unsustainable expansion of courier services by G. Thompson Limited through the creation of a heavily-used parcel depot in the centre of the mews, whilst simultaneously allowing unrestricted operation of their 24 hour call and control centres, to the significant detriment of the surrounding community.

The applicants use the word 'swap' as a casual way of implying this application is a mere formality and nothing will alter. This is not entirely true. The empty area of 22/23 is larger than that which is presently used in 21a for the purposes of parcel storage, which in essence is what they want 22/23 to become. Declaring that the parcel storage area is reducing from 232m² to 144m² is deceptive. See the plan below for a better understanding of present realities.



21a is stated as being a "head office and control centre" with their ground floor predominantly used as office space. Where they can find space, they store parcels, and in so doing, have made a makeshift depot. (They have previously tried to avoid this terminology, hoping instead that their depot south of the

River Thames is considered the conduit for deliveries transferred between vehicles.) Having this depot in 21a in the first place does not correspond to previous assurances that "only occasional" packages will be left at the head office and only in exceptional circumstances. Residents continue to observe a steady and repeating crew of drivers making daily drop-offs and collections. This is not "occasional" and over the last 18 months this parcel storage process has significantly increased in intensity.

With intensity comes more vehicles. When the applicant states the number of vehicles to 21a will likely reduce, this is immaterial. The increasing number of vehicles needed to cater for an enlarged parcel depot will still drive up the mews but stop at 22/23, just three metres shy of neighbouring 21a. In reality, the vehicles will still park outside 21a and use the 22/23 entrance, as they presently do the reverse (parking outside 22/23 and entering via 21a). Camden's parking attendants have a tough enough job already in policing the couriers' hostile receptions, as was observed only recently.

In addition to the freedoms given to 22/23, the application encourages 21a's hours of use to be unrestricted. This would play into the couriers' hands of making the control centre a 24 hour operation (something they boast on their website and which happens on a smaller scale presently with staff coming and going throughout the night at 22/23). Entering and exiting, smoking breaks and light pollution would affect the residences opposite 21a throughout the night. This second stipulation fills us with dread.

All businesses wish to expand. The couriers' previous claims to the council and HM inspectors that they have no desire to expand have not been apparent. Pink Express's arrival in 2012 is testament to this expansion. The couriers use the street as their private yard during their peak times and car park for the rest of it. The drivers use the area as a social base, so for the applicant to assume that the vehicles will come and go quicker is to be out of touch with the social dynamic of camaraderie and cigarette breaks that are played out every weekday outside 21a and 22/23. Making the 'depot' official, expanding storage and processing, and therefore increasing vehicle intensity will only exacerbate the present glut of activity that is proving detrimental to local amenity. With the general increase in residential opportunity in that area, there are a growing number of young families moving in. The brisk driving style of couriers along the pavement-less alleyways is a peril they could do without.

Indeed, it is only the couriers that now cause significant disruptions to the peace of the mews. The street is made up of residences and businesses living happily cheek-by-jowl. It is narrow, cobbled and quiet, yet subject to the canyon effect as noises echo along it. The couriers' activity in this environment is akin to those in an industrial estate, the area is not fit for purpose and they are unapologetic in their practices.

The concluding part of the planning application's cover letter demonstrates a strong desire for the attention to be taken away from the strategic activities of the occupier and on to the passivity of the land. That speaks volumes, revealing the company's furtive, incremental expansions that slowly suffocate the environment of Brownlow Mews. This tactical, exploitative approach (carried out with depressing regularity through a decade of calculated applications and appeals), further alienates this company from the community, destroys the residential amenity and increases the risk to public safety from increased traffic on unpaved side streets. Please recognise that there is more than meets the eye with this application, and a dead-hearted decision based exclusively on land use will allow the company's attempts to turn Brownlow Mews into their private yard to continue unopposed.

I strongly request that this application be rejected for this and the other reasons stated.

Yours Faithfully,
Richard Simmonds