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**From:** Karine Boccara <[REDACTED]>  
**Sent:** 14 February 2021 23:10  
**To:** Planning  
**Cc:** Karine Boccara  
**Subject:** Objection to application 2020/5913/P 3-6 Spring Place NW5 3BA - C/o David Peres Da Costa

**Follow Up Flag:** Follow up  
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Dear Mr Da Costa,

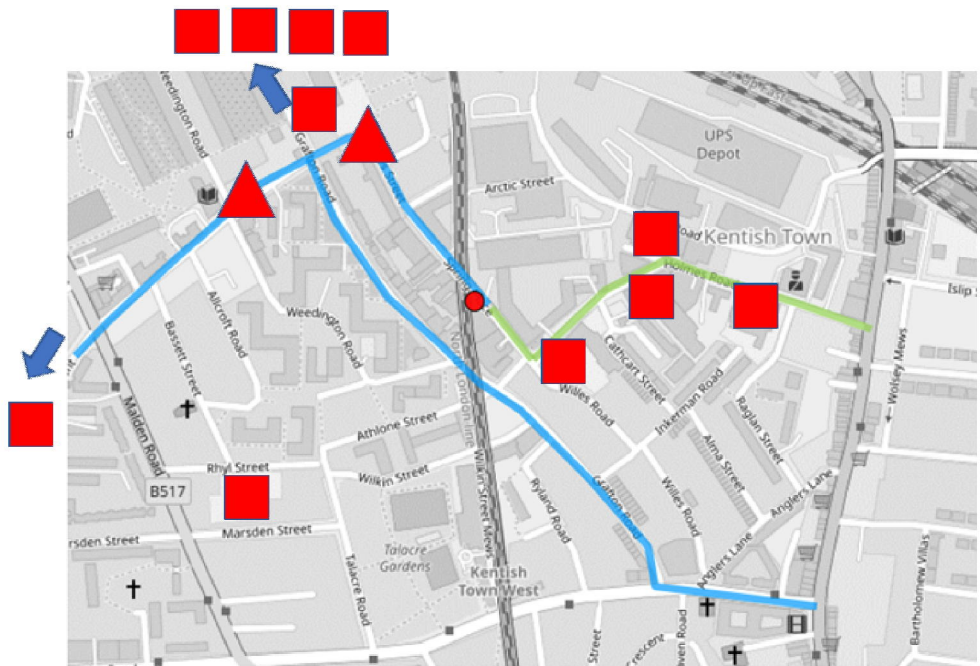
I have sent my objection to application 2020/5913/P online, however, I was unable to attach the illustrations, which I included below. I therefore would like to submit my fuller answer to the application to you.

In my opinion, this application is bad for residents, school children in the area and local businesses. In addition, the streets in the area are so narrow that I believe that the Site is no good for the Applicant either.

Kind regards  
Karine Boccara  
18 B Gillies Street  
NW5 4DN

**Comments on planning application 2020/5913/P Spring place**

I reject the request for change of use presented in the application listed above. My arguments are set out in the points below.



Legend: squares indicate schools and student accommodations; triangles indicate restricted traffic issue or traffic restricted to pedestrians two days a week. Dot: Site of planning application.

1. Routes and road width – inappropriate for vehicle size

All of the streets highlighted are fairly narrow and not appropriate for additional lorry traffic. The only larger road shown is Prince of Wales Road.

The corner of Gillies Street and Queen's Crescent is particularly tight for large vehicles to turn on this bend. Those large vehicles regularly get stuck at the corner, blocking traffic in both directions as they manoeuvre their way round. A tree near the corner was damaged by oncoming traffic and a new tree has recently been replanted by the Council (outside number 18). Further along, on Gillies Street, a turning vehicle bent a pedestrian-protecting pole installed by Camden Council and damaged and shifted out a large planter that was behind it. The pole has been removed and the planter still bears the damage done.

Queen's Crescent has a regular market in place during the week and is closed to traffic on those days throughout the day, hence the blue route indicated down Queen's Crescent would often not be accessible, what would be the alternative route proposed?

Holmes Road is also a very tight road, which despite being opened to traffic in both directions, is, in practice not at all suited to traffic from large vehicles. This is particularly a bad issue at the junction with Kentish Town Road.

2. Danger to pedestrians

The junction of Holmes Road, Willes Road, Spring Place is currently already a dangerous crossing for pedestrians with no clear space to cross. This would only get worse under the proposed plans due to increased vehicle traffic.

3. Negative impact on schools and school children unacceptable

There are multiple schools in the area, including three on the routes highlighted:

- St Patrick's Primary School – Holmes Road
- CFBL Primary & Secondary School – Holmes Road/Willes Road
- Carlton Primary School – Grafton Road
- The route is also taken by children and parents/carers going:
  - Via Grafton Road to Gospel Oak Primary School, Parliament Hill School, William Ellis School and La Sainte Union School
  - Via Grafton Road or Queens Crescent to Rhyl Primary School and Haverstock School
- There is also university student accommodation along Holmes Road

4. Residential area not suitable for increased traffic

This is a residential area and as such is not suitable for constant use as a depot with traffic 24/7.

5. No benefit to local economy

Camden should be promoting the use of local shops and market rather than encouraging delivery services.

6. Negative environmental impact

It is also a concern as it conflicts with Camden's commitment to reduce carbon emissions as the proposed development would significantly increase traffic from large polluting vehicles for years to come. This could increase carbon emissions in the area by many orders of magnitude which is totally unacceptable in an area which hosts many schools, as noted above.

7. Misleading statement on local area description in the planning application

The comment below from the Applicant is very misleading (source: 231120\_SEGRO\_Health Impact Assessment Screening Report from the Planning Application 2020/5913/P):

1.6 Within the immediate context of the Site there is a mixture of residential accommodation to the north west (along Spring Place and Gillies Street) and south (Grafton Road, Warden Road, Willies Road and beyond), together with industrial, distribution and warehousing units to the north.

The misleading statement concerns "together with industrial, distribution and warehousing units to the north". The reason the statement is misleading is that it implies that there are already similar units in the vicinity. However, it fails to mention that **none of industrial, distribution and warehousing units have access to the residential area** where the proposed planning application is being made; indeed, all of these units are only accessible through Regis Road at the very north of Kentish Town Road. Therefore, **the statement is false** as the area is residential and **not a mixture** of residential and industrial, distribution and warehousing units.

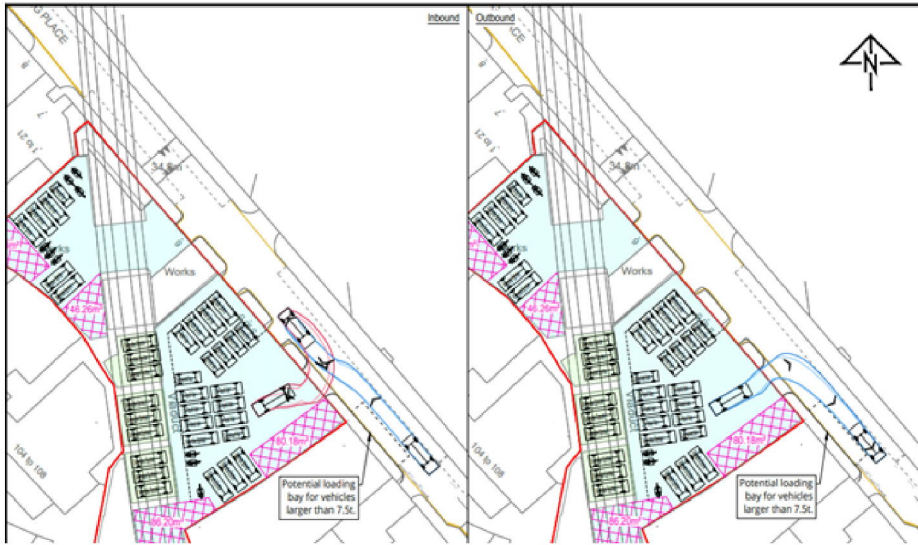
8. Misleading photos used in Appendix E of planning application

The on-street loading photos presented by the Applicant are misleading (source: Appendix E - Example of On-Street Loading in Urban Locations from the Planning Application 2020/5913/P)

All the photographic examples shown are for streets twice as large as Spring Place and all of the streets highlighted in the routes proposed by the Applicant are also narrower than the photos. Moreover, all of the photos show no traffic and wide pavements with little travelling pedestrians. Spring Place and all the areas of the routes highlighted by the applicants have residential street parking on both sides of the street, unlike the photographic examples presented. All of this is totally at odds with the area near the proposed planning application, where there is already car, moped and bike traffic, and is bustling with pedestrians, including many children going to the many schools in the area. Pedestrian are using both sides of the street, including the side where the proposed distribution site is located. Once again, the proposals are totally inappropriate for the area.

9. Reality of traffic impact on the area shown in Appendix C

The reality of the proposed impact of on-street loading is, instead of Appendix E, best represented in Appendix C – Swept Paths (illustrated below). Is it quite clear that due to the width of the street, combined with the fact that there is parking on both sides of the street, the space left for traffic is reduced and the proposed vehicle fleet from the Applicant would completely block traffic in both directions for any other vehicle. Note that the figure in Appendix C clearly shows that this continues along the proposed route towards Gillies Street. Knowledge of the area would demonstrate that once a vehicle of this size is on the road, it would block other traffic in the opposite direction throughout the routes proposed. This is without taking into account the sharp (90oC) bends at the end of Gillies Street and Grafton Road onto Queens' Crescent, which would cause further difficulties. It should be noted that the illustration shown in Appendix C is for the smaller type of vehicle proposed, rather than the larger 7.5 t vehicle, which would also be used at the proposed location. It is without question that the proposed new traffic engendered would be totally out of place in this residential area, creating a very significant risk of traffic jams.



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