



Da Vinci House
44 Saffron Hill
London EC1N 8FH
tel: +44 (0)20 3640 8508
fax: +44 (0)20 3435 4228
email: info@iceniprojects.com
web: www.iceniprojects.com

David Peres da Costa
LB Camden
Camden Town Hall
Judd Street
WC1H 9JE

19 March 2021

AG/SM – 19/423
BY EMAIL

Dear David,

3-6 SPRING PLACE, KENTISH TOWN – PLANNING APPLICATION 2020/5913/P

Thank you for meeting with us on 5th March to discuss the above application. As agreed, we provide additional details regarding the proposed updates to the scheme that were mentioned by the team. These relate to amendments to the loading doors to facilitate off-street loading, updates to the routing strategy and further information on noise impacts.

As discussed, we should be grateful for the Council's feedback on the additional information provided in the first instance, so we can hopefully agree a solution to any outstanding queries and comments prior to submitting formal amendments to the planning application.

We provide below a brief summary of the updates included within the enclosed pack of information.

a. Highways

The key amendments proposed to the scheme are detailed below. Please refer to the supplementary note prepared by Vectos which responds directly to all of the comments raised by the Highways Officer.

Loading Doors – Amended Design

In order to facilitate on-site loading, the updated scheme proposes to alter the existing access arrangements to provide three access doors instead of four and widen the doors to 10m. This is shown on the proposed floorplan (drawing ref: 19-275-SGP-XX-00-DR-A-131100-G) and proposed elevations plan (drawing ref: 19-275-SGP-XX-XX-DR-A-131301-B) enclosed.

The updated scheme enables all vehicular activity to take place on-site including all servicing/delivery of goods. Vehicle tracking shows that the largest vehicles servicing the site (7.5t and 18t vehicles) can be accommodated internally, removing the requirement to transfer goods over the footway from a loading bay, which was raised as a concern by the Highways Officer. Subject to the Council's support for the widened doors SEGRO would be willing to include a commitment to internal servicing only within the Delivery & Servicing Management Plan.

The design of the front elevation will remain broadly in line with that previously proposed. The elevation is consistent with the colour and cladding of the existing 1920's style unit, so as to remain sympathetic to the local built environment whilst allowing for the safer and more efficient use of the space to meet the needs of modern businesses. We note that the previous planning permission granted for this site (application reference 2016/5181/P) permitted the demolition of the entire building to facilitate the redevelopment, and that the Council considered the building to be of "limited architectural merit" (as discussed in the officer's report). The current development proposals will

enhance the overall appearance of the building and significantly enhance the environmental performance whilst also ensuring it meets the requirements of occupiers, and in this context the widening of the loading doors to facilitate off-street loading is considered to be appropriate. Further details regarding the environmental credentials of the scheme are included in the enclosed graphic.

Routing Strategy

As a result of the updated scheme, and to respond to the comments raised by the Highways officer, the routing strategy has been amended to remove Queens Crescent and Gillies Street to the north of the site. Now that all servicing vehicles can be accommodated internally, these vehicles will travel to/from the site to the south via Grafton Road and Holmes Road.

Other Concerns

The supplementary note prepared by Vectos also seeks to address the other concerns raised by the Highways Officer, and demonstrates the following:

- The proposed development will not result in a significant number of vehicular movements and when spread across the day the impact on the surrounding road network will be negligible.
- The surrounding roads are considered appropriate to accommodate servicing vehicles (7.5t and 18t vehicles) and delivery fleet vehicles. It is noted that there is an area of KSI's at the Holmes Road/Kentish Town Road junction and the Applicant is willing to work collaboratively with the Council to improve safety at this location whilst maintaining vehicular access to existing employment sites including 3-6 Spring Place.
- At the Spring Place/Holmes Road/Grafton Road 'dogleg' there are wide footways with bollards on either side of the road to separate vehicles and pedestrians. There is also a raised table to reduce vehicle speeds. In addition, there has only been one slight pedestrian/cyclist casualty at this location. Given the proposals will not significantly increase vehicle movements on the surrounding road network including at this location, it will not detrimentally affect the safety of pedestrians and cyclists.
- It has been demonstrated that B8 warehousing (commercial) TRICS sites are not comparable to what is being proposed at this site and therefore the assessment presented in the TS to establish B8 last mile vehicle movements is acceptable. Notwithstanding this, the B8 TRICS assessment shows that it would result in similar levels of trips in any event.

In terms of the internal operation, as illustrated in the enclosed video, a last mile operator would run this site in a high controlled and efficient manner, with an efficient layout to allow for storage of vehicles loading area and pedestrian routes. Parcels will be pre-sorted before delivery to the site, and each delivery vehicle will have a pre-booked slot and allocated route. As discussed in the Vectos note, Addison Lee's previous operation of the site also involved pre-allocated time slots and an efficient system to accommodate the 150-175 vehicles visiting the site associated with the B2 use. Accordingly, the operation will be controlled to ensure efficiency and the proposals would not result in a significant highways impact.

b. Noise

An Environmental Noise Survey and Noise Impact Assessment Report (ref: 27570-RP-NIA2-Rev 5-FF) was completed by Hann Tucker in support of the planning application. Subsequently a Project Technical Memorandum (ref: 27570-PTM2-Rev0-FF) has been prepared (enclosed for reference), to highlight some of the key points in response to comments on the application, albeit this has not been formally submitted to LB Camden. As part of their assessment, Hann Tucker had previously

undertaken noise measurements at a similar SEGRO site in Deptford to provide an accurate representation of the noise generation from loading activities.

The assessment concludes that in terms of noise from internal activities, the extent to any noise breakout to the nearest residential properties would be negligible, and would not be observable, having regard to LB Camden's noise standards. In terms of external loading, the noise emitted was assessed as only resulting in a slight increase on existing ambient noise levels, and at a level considered to be entirely acceptable having regard to the relevant noise standards. The nearest noise sensitive residential dwellings are flats at 7 Spring Place approximately 43m away. It is likely that ambient noise levels shall be higher for the majority of the day and thus noise impact at the nearest noise sensitive window would tend toward inaudible. Notwithstanding the conclusions of the noise assessment, the widening of the loading doors now proposed would enable all loading activities to take place on site, thereby further reducing the noise impact of the proposed use from that assessed in the latest noise assessment.

c. Refurbishment Works/ Next Steps

We discussed at our meeting that the proposed updates to the scheme described above are likely to require re-consultation following the submission of formal amendments, and we are conscious that this is likely to require an extension of time to the determination period of the application (which SEGRO would be pleased to agree with LB Camden as necessary).

In the meantime, SEGRO are keen to progress with the refurbishment programme, which includes measures such as replacement of the existing roof and physical works necessary to make the building fit for occupation (regardless of what use class the building is ultimately occupied for). It is intended to progress with the physical improvements swiftly to focus on the marketing of the site, to generate additional interest from prospective tenants and minimise any delays to the overall programme for bringing this site back into employment use.

Accordingly, SEGRO are considering submitting a separate planning application for just the physical refurbishment works (without reference to the proposed change of use from B2). The intention is that, subject to the physical works application being granted prior to determination of the current application, this would enable SEGRO to progress with the refurbishment programme in the meantime while the current application including the change of use is discussed with the Council and local residents/ stakeholders and updated.

We should be grateful for your feedback on this approach, the likely timescales for determination of the application (and whether the application could be determined under delegated powers), and the list of technical documents that would need to accompany such an application. Based on an initial review of the Council's Validation Checklist, we would anticipate the following would be required, subject to any comments you may have:

- Architectural Plans
- Covering Letter
- Design and Access Statement
- Sustainability Statement
- Drainage Strategy

In addition, SEGRO will continue to engage with local residents and key stakeholders on the current application. Both schools on Holmes Road have agreed to meet with SEGRO and we will keep LB Camden updated on our discussions with them.

We trust this provides a helpful summary of the proposed amendments to the current scheme and the potential next steps SEGRO is considering, and we should be grateful for the Council's feedback on

these points. In the meantime, please do let us know if you have any queries or require any additional information.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Andrew Gale', enclosed within a blue oval shape.

Andrew Gale
CHIEF OPERATING OFFICER

cc. Stephen Burke, LB Camden Highways