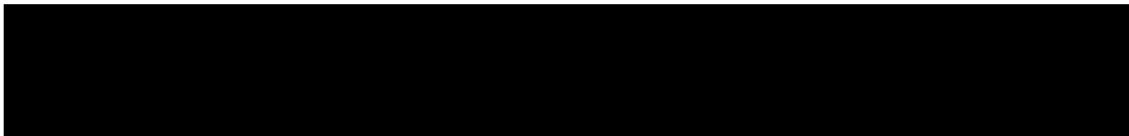


**Subject:** 2021/2446/P. Re: Basement Floor, 368-370 Cascades Apartments, Finchley Road London, NW3 7AJ



Dear Ms Henry,

We are residents of a house to the rear of the Cascades development. In summary, we object to this application on the following grounds:

1. **Damage to residential amenity** (noise pollution, air pollution, increased traffic, operating outside “normal hours”;
2. **Highway safety** (danger to pedestrians, including school children, and to vehicles); and
3. **Change of use from residential to commercial use.**

Please note that points 1 and 2 above overlap and will be considered together in sections A and B below.

We should be grateful if the Council would take these objections into consideration in reaching a decision on this application.

**A. Damage to residential amenity (section 6 of the Camden Local Plan) and increased risks to highway safety**

1. Increased traffic caused by the proposed change of use will come in two forms:

**a) Deliveries into the site:**

- i. Lorries coming into London from the North Circular along the A41 (presumably the majority) will have to drive through residential areas (and some very narrow streets with insufficient space for passing vehicles – see section A2 below) to deliver to the Cascades rather than using the main roads (the Finchley Rad and the A41). *This is because it is not possible to turn into the Cascades from the A41/Finchley Road junction.* The most obvious options for those lorries are to:
  - a. drive up Platt's Lane, turn left into Briardale Gardens/Clorane Gardens, then left onto the Finchley Road and then left to the Cascades; or
  - b. drive up Hermitage Lane, turn right into Platt's Lane, turn right down Briardale Gardens, then left onto the Finchley Road and then left to the Cascades.
- ii. Lorries coming from central London towards the North Circular will also have to use residential roads e.g. Heath Drive, then Ferncroft Avenue, then Briardale Gardens. *This is because there is no direct access from the main road to the Cascades entrance.*
- iii. The email from Russell Quick to Kate Henry dated 21<sup>st</sup> June 2021 refers to “2-3 deliveries per day in by van or small (7-tonne) truck”. Presumably the number of deliveries to site will rise as the business grows and demand increases – no details are given as to the basis for this particular “estimate”, how rapidly expansion is planned or how future delivery figures might increase. There is also no information given about whether this will include deliveries on weekends and Bank holidays and whether such deliveries will take place outside “normal trading hours”(say 09:00-17:00) – they could be very early in the morning or late at night (given the proposed 18-hour daily opening times). Further information is needed. If the application were to be granted, would a strict cap be put on both the timing and number of daily deliveries and on the size of these delivery vehicles and would Camden Council be able to monitor this?
- iv. How will deliveries to site actually be carried out? Any lorries parking near the Cascades entrance will be blocking buses/near bus stops in an already very congested and dangerous traffic junction, very close to a pedestrian crossing and on a heavily used pavement. Any U-turns or other turning manoeuvres carried out by delivery vehicles on the Finchley Road will increase traffic hazards for other vehicles, as well as pedestrians, on the Finchley Road. This includes a large number of school children walking, or waiting to catch a bus/school coach, to school.
- v. Lorries delivering to the Cascades will cause delays to buses along the Finchley Road as they turn and/or are unloaded. There are three bus stops very close to the Cascades, heavily used by commuters and school children, and three bus routes use these bus stops.

**b) Deliveries from the site to clients:**

The Design and Access Statement specifically states that delivery to clients will be by bike or electric bike. However, the email from the applicant's agent, Russell Quick, dated 21 June 2021 to Kate Henry (in the additional information section) mentions both bikes and mopeds. A moped is not an electric bike. Clarification from the applicant is required on this point. Our concern is that the applicant will use mopeds (as per Deliveroo) or motorcycles (or indeed cars for larger food deliveries), particularly given the speed of their promised delivery - 15 minutes over a large zone. The noise and pollution caused by fuel-powered mopeds, motorcycles or cars is very different to that of (presumably) noiseless electric vehicles. If the application were to be granted, would a strict specification be put on the exact type of delivery vehicles to be used (i.e. bikes and electric bikes only) and how would it be possible for compliance to be monitored by Camden Council?

**2. Impact of increased traffic on residential amenity and highway safety**

- a) Briardale Gardens is the closest access road from the site into Hampstead. It is already frequently used as a cut-through route during non-restricted hours for vehicles to access the Hampstead area and (particularly when traffic builds up on A41/Finchley Road junction, as it frequently does) Belsize Park and Swiss Cottage too. Briardale Gardens is therefore the obvious route of first choice for any delivery vehicle delivering food to the Hampstead area and for use as a short-cut for deliveries to Belsize Park and Swiss Cottage.
- b) These are very narrow residential roads, particularly Briardale Gardens and Clorane Gardens, where two normal sized cars cannot pass at once. For bigger vehicles to use them as a cut-through, plus numerous smaller vehicles carrying out deliveries will cause yet more traffic problems and potentially put other drivers, passengers and pedestrians at risk. As residents, we have witnessed numerous incidents of dangerous driving, road rage and near misses along Briardale Gardens (numerous instances of which were reported to Camden in relation to the implementation of traffic restrictions prior to 2018). Those members of the Planning and Transport Departments

who were involved in the traffic restriction negotiations with Barnet are therefore already fully aware of the risks to pedestrians on the section of the Finchley Road near to the Briardale Gardens turning/Cascades entrance.

- c) In terms of deliveries from site alone, vehicles are expected to leave the site every six minutes which, over an 18-hour period, is a **very significant increase in vehicles** – 180 per day (the email from Russell Quick to Kate Henry dated 21<sup>st</sup> June 2021 refers to “typically 10 deliveries per hour....(depends on demand)”). The Design and Access Statement makes clear the significant scale of the proposed business (circa £3 million will be invested in infrastructure at the outset).. Presumably this number will rise as the business grows and demand increases – no details are given as to the basis for this particular “estimate” or how “typical” has been calculated, how rapidly expansion is planned or how future delivery figures might increase. Much more detail is required. If the application were to be granted, would a strict cap be put on both the number of hourly deliveries and how would it be possible for compliance to be monitored by Camden Council?
- d) **Timed traffic restrictions on Briardale Gardens:**
  - i. Traffic congestion has, and continues to be, a major problem on Briardale Gardens and Clorane Gardens, hence the timed traffic restrictions put into place by Camden (after negotiations with Barnet) in 2018 for access from the Finchley Road. *Increased number of vehicles, including lorries, will impact adversely on the residents of these roads and reduce the positive effect of the traffic restrictions.*
  - ii. Please note that the timed traffic restrictions for Briardale Gardens do not operate in the middle of the day, evenings or at weekends (whereas Jiffy plans to operate 18 hours per day, 7 days a week). Camden’s original plan was for 24 hour traffic restrictions, not the limited time restrictions eventually implemented. The reason for this change in plan was Barnet Council’s persistent refusal to allow 24-hour restrictions – insisting on only part-time restrictions - thereby leaving Camden’s hands tied. If the traffic outside restricted hours worsens as a result of the Jiffy depot, then it will be quasi-impossible for Camden to extend the restricted hours as Barnet’s consent will still be required and will not be forthcoming, based on Barnet’s previous attitude.
  - iii. Moreover, the traffic restrictions do not in any way protect the residents from traffic coming from Platts Lane, down Briardale Gardens to the Finchley Road (a likely route for deliveries to site, as mentioned at section A above).
  - iv. These two small streets risk yet again becoming the highly congested and dangerous alternative to the Finchley Road that they were prior to the traffic restrictions being introduced in 2018 – a “rat run”.
- e) On the Finchley Road itself, a constant stream of vehicles entering and exiting the site will add congestion to what is already a very congested road and overcrowded junction with the A41. Lyndale Avenue bus stop, serving three busy bus routes (the 139, 328 and 13 buses, used by numerous school children and also by commuters), is close to the entrance to the Cascades entry/exit point, plus two other bus stops close by on the Cascades side of Finchley Road and one on the opposite side. Jiffy vehicles will cross over the pavement close to pedestrians waiting at the bus stop, walking on the pavement and waiting to cross at the pedestrian crossing. This include large numbers of school children (including those waiting for the numerous school coaches that leave from the bus stops on both sides of the Finchley Road). Drivers (particularly under time pressure) may execute dangerous manoeuvres such as U-turns on the Finchley Road.
- f) **Transport Statement/Assessment:** We note that the application does not contain any obvious assessment of the proposal on highway safety or residential amenity. The applicant has not provided any proof that there will be no negative impact on both the above. Such assessment must surely be critical given such a busy and already dangerous junction. It would strongly seem that a transport assessment or statement is needed, given the proposed change of use that could impact the transport system in the surrounding area. This includes inter alia details of the expected impact of the proposed development on the local transportation system (including economic, environmental and social impacts), details of the proposed approach to limit the expected impact of the proposed development on the local transportation system, details of existing and proposed journeys to and from the proposed development site by all modes of transport and details of arrangements for manoeuvring and parking. The Camden Planning Guidance on Transport applies to planning applications that involve a change in the way that a site is accessed from the highway in terms of the number, mode or profile of trips (as in this application) – see Clause 2.3. Clause 2.4 states that “*In line with policy A1 of the Camden Local Plan, the Council will resist development that fails to adequately assess and address the transport impacts of a development.*” Furthermore, section 6.10 of the Camden Local Plan states that “*highway safety, with a focus on vulnerable road users should also be considered, including provision of adequate sightlines for vehicles leaving the site. Development should also address the needs of vulnerable or disabled road users.*”
- g) We are concerned about the impact on residential amenity of drivers gathering before/in between carrying out their deliveries. In Deliveroo sites, drivers can regularly be seen waiting outside in groups with their mopeds. Where will delivery vehicles be stored when not in use? There is no clear space in the plans provided for vehicle storage.

**B. Increased noise and air pollution/quality**

1. There is already an issue with poor air quality and air pollution in the area, not just on the main roads but also in the residential streets (particularly in Briardale Gardens), for which Camden has the figures - these are already well above maximum recommended levels. Any non-electric vehicle, for both deliveries to and from the site, will increase the problem. Camden will itself be aware of its legal obligations with regard to the control of pollution and its impact on the health and safety of local residents.
2. Increased traffic will lead to increased noise pollution in quiet, narrow residential streets (Briardale Garden's houses being very close to the road). Deliveries early in the morning and late at night will adversely impact on residents, including but not limited to children and the elderly.
3. We are also concerned that substantial refrigeration units necessitated by the application will emit both noise and fumes into the area adjacent to our dwelling, not to mention the residential flats above the proposed storage and distribution centre. Is a noise, vibration and ventilation assessment needed? See Policy A1 of the Camden Local Plan regarding harm to amenity caused by noise and vibration levels.

**C. Change of use from residential to commercial use**

1. Planning permission for the Cascades was for a purely residential block on the very edge of a conservation area – one of London's oldest garden suburbs. The developers chose to create a large basement area in the clear knowledge that planning permission granted in that respect was to service the needs of residents (domestic storage etc..) and that parking places were to be limited to several disabled parking permits. To allow change of use to commercial, and thereby put an Amazon-style delivery depot right on the edge of a quiet residential and conservation area, with delivery vehicles inevitably using those residential streets (as explained above) rather than the main roads, would ride roughshod through the careful (and very detailed) original planning process.
2. The developer of the Cascades were only permitted by Camden to provide disabled parking spaces in the basement and non-disabled Cascades residents are not permitted to keep cars in that space or indeed to have on-street parking permits. This decision was made as part of Camden Council's plan for car-free housing (Camden Core Strategy (CS11 – Promoting sustainable and efficient travel), Camden Development Policies (DP18 – Parking standards and limiting the availability of car parking), Camden Transport Strategy and Camden Planning Guidance (CPG7 Transport)). It would be deeply ironic, and wholly contrary to that policy, if planning permission were now granted to a commercial development scheme which would create more traffic (and associated problems) than would have been caused by allowing Cascades' residents to park their own cars in the basement.
3. It is not clear from the Design and Access Statement what will happen to the disabled parking bays that were to be located in the basement of the Cascades (decision 2014/7038/ D) and where disabled occupants of the Cascades would park should this application be granted.
4. The hours of the proposed operation are outside 'normal' business hours, which will have an adverse impact on residential amenity (section 6 of the Camden Local Plan).

**D. Site visit**

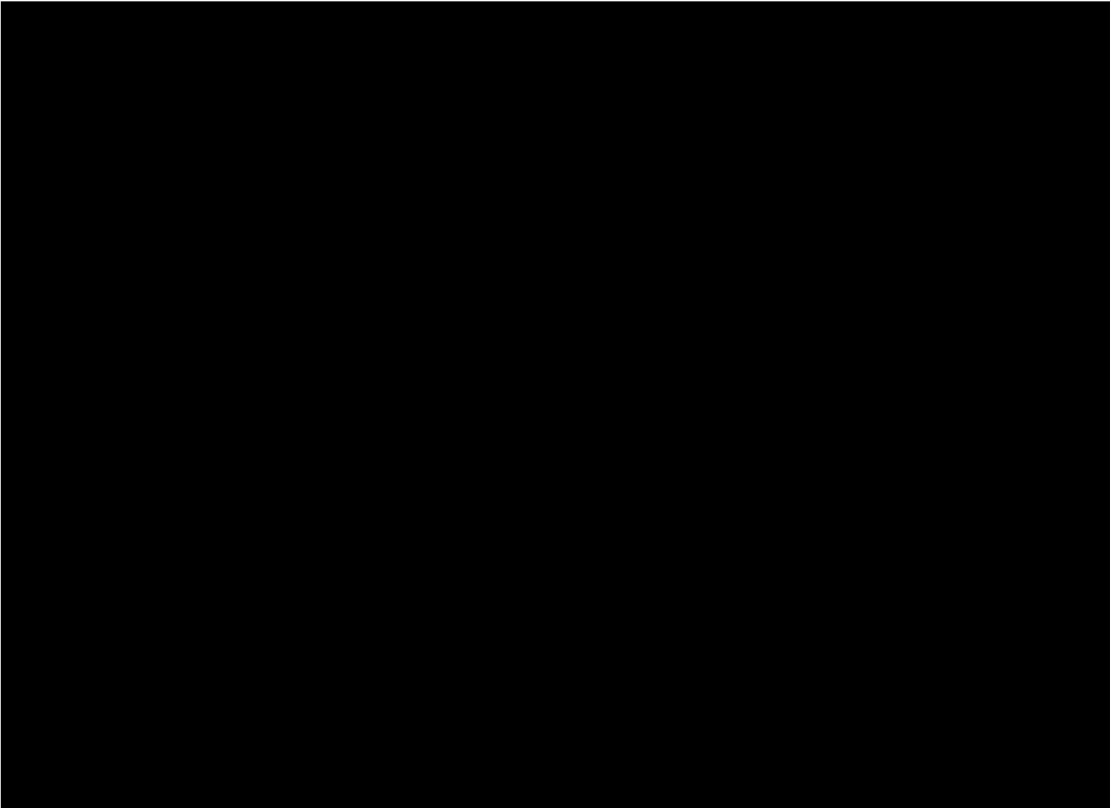
We would very appreciate the chance to show Council representatives on a site visit (or remotely):

1. the traffic and pedestrian hazards on the Finchley Road which this application would potentially cause;
2. the routes which delivery lorries into the proposed Jiffy site would be obliged to take through residential areas in a conservation area;
3. the routes which delivery vehicles from the proposed Jiffy site would be likely to take through these residential areas; and
4. the nature, size and narrowness of these residential streets.


Kind regards,  
**Catherine Marsh and Nicholas Field**  
**12 Clorane Gardens**  
**London NW3 7PR**







**Subject:** 2021/2446/P.Re: Basement Floor, 368-370 Cascades Apartments, Finchely Rd, NW3 7AJ

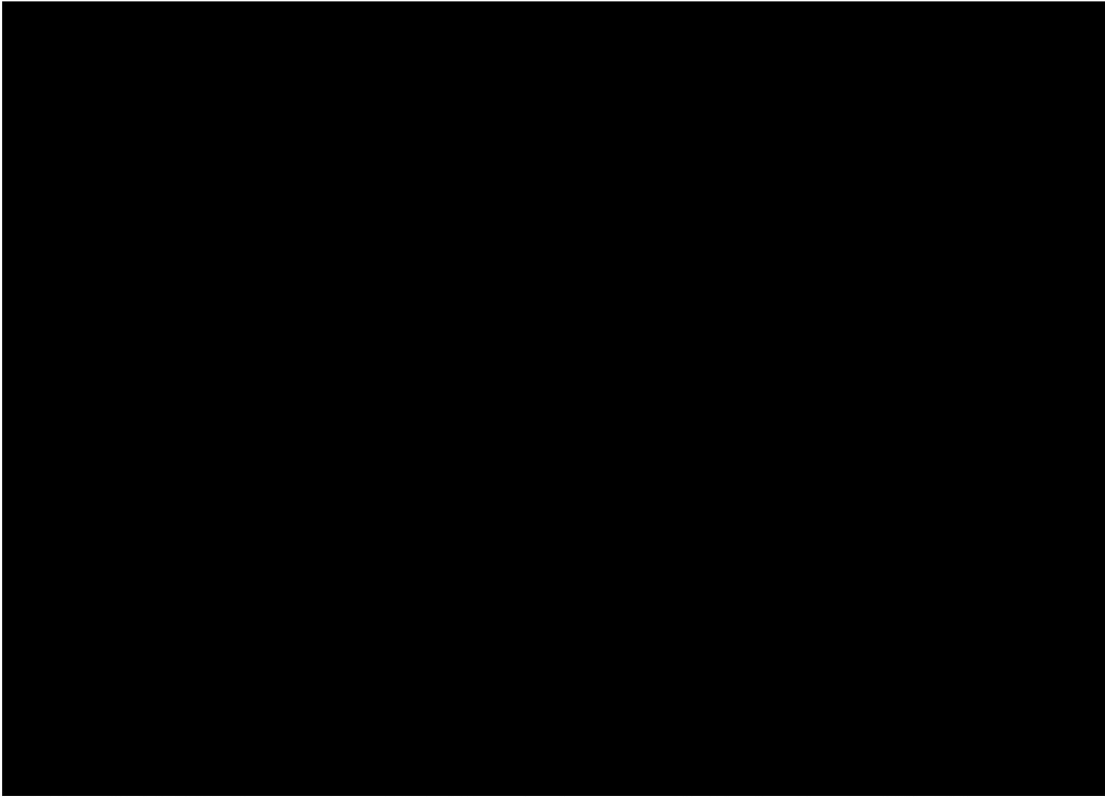


Dear Kate


I am writing to you regarding the 'change of use application' for the Basement of Cascades flats on Finchley Road (adjacent to Lyndale avenue) from residential to commercial use as a 'grocery storage and distribution' business. Briardale Gardens already experiences huge amounts of traffic from cars entering from Finchley Road and we experience regular road rage incidents and traffic jams caused by motorists.

If this application is approved there will be even more traffic generated by **daily deliveries operating 7 days a week between 7am-11pm**. I am strongly against this application being approved, and I am very concerned about the increased levels of noise and air pollution generated by delivery vehicles. Furthermore, Briardale Gardens is an extremely narrow road and this increased rate of traffic flow would put residents including small children at risk. It is simply unacceptable to allow this application to go ahead considering how close by it is to residential streets. I urge you to reconsider this application due to the problems it will cause.

Regards, Jason



**Subject:** 2021/2446/P. Basement Floor, 368-370 Cascades Apartments, Finchley Road London, NW3 7AJ



Dear Kate

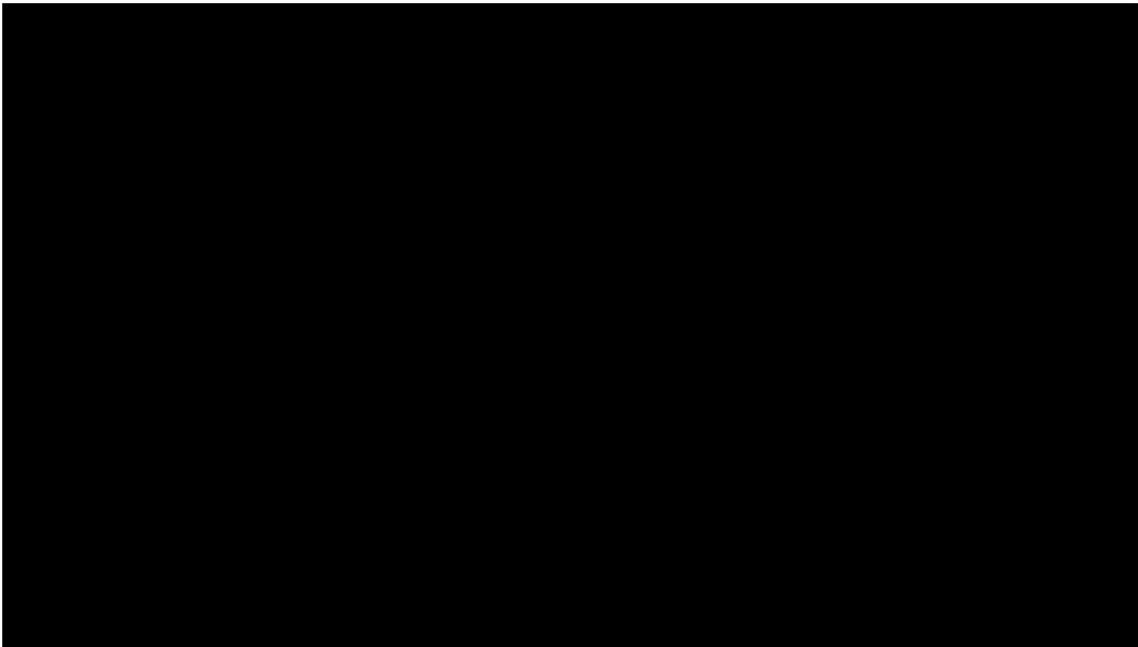
It's literally impossible to put extra traffic on our road yet again! The scheme from Barnet does not work for anyone apart for Barnet ( they collect money on an every day basis)

We still have many cars coming through our street at the restricted time which causes lots of problems for residents. So what will happen if this will increase dramatically after this kind of business will be open nearby! Who can possibly be in favor of this venture?


Please dont allow it to go ahead, we are really in danger even when we cross the street...none of them drive through within the legal speed limit, 20 mph!!!

**STOP THEM NOW!**

Regards, Irina



Subject: 2021/2446/P Re: Basement floor, 368-370 Cascades Apartments, Finchley Road, NW3 7AJ



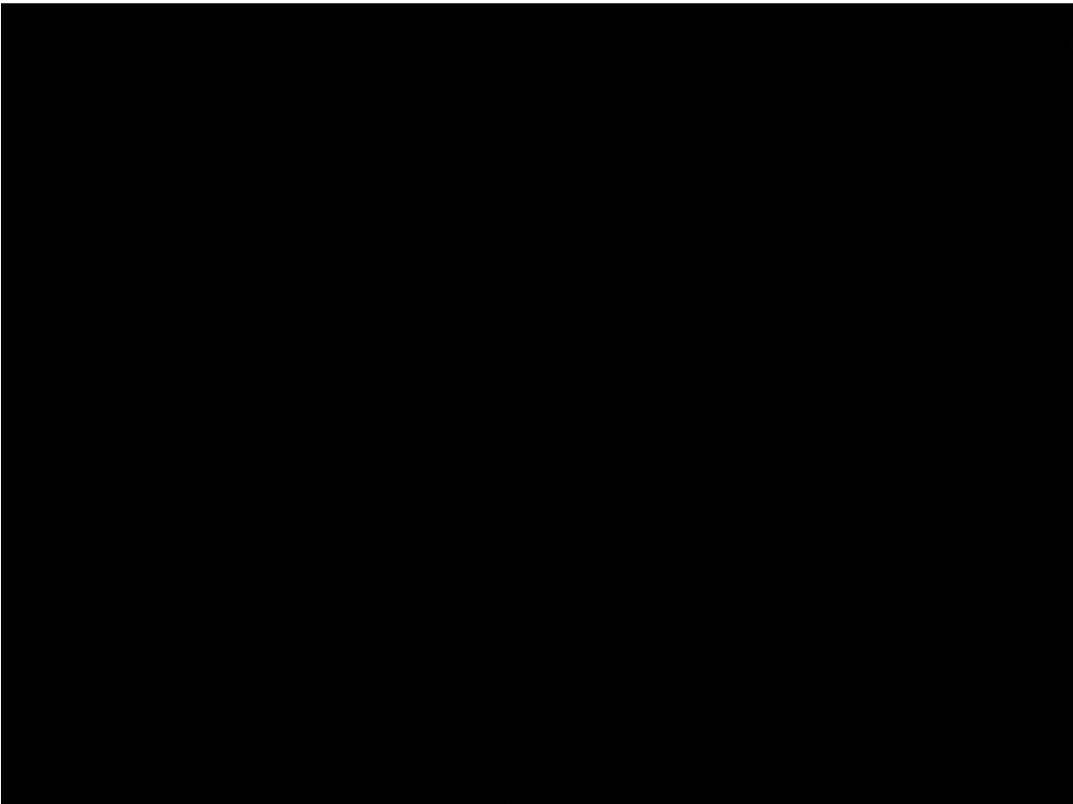
Good Day,

We are residents of nearby Vernon Court and we want to object the proposal of establishment of a warehouse in our neighbourhood on Finchley Road. This will cause major in traffic congestion and pollution. We are already struggling stuck on buses everyday on the junction as all buses coming from Finchley Road are not able to join the traffic and it sometimes takes 10 mins to pass through. Adding a number of delivery vans and lorries to the area will create a daily mayhem. We are already experiencing the construction of a new block of flats here, so this will already add traffic here.

Please count my voice as objection to the above proposal. This is a residential area not a warehouse fields and thats how it should be maintained.

Kind Regards  
Tomasz Paprocki  
Vernon Court, Hendon Way, NW2 2 PD





**Subject:** Re: Project Application Reference 2021/2446/P



Dear Ms Henry,

It has come to our attention that our objections to the planning application may not yet have been submitted. To this end, would you kindly ensure that we object to the proposed use of this underground space as it is a blatant violation of the lease agreement that we hold as leaseholders. Specifically, commercial activity by all parties on the premises is explicitly prohibited.

Many thanks for your help in this matter.

Lynn and Georges Apple



Dear Ms Henry,

We submit our response to the Application Reference 2021/2446/P directly to your email address because the web link is not working. This is the application from Jiffy to allow a food and drink distribution center from the basement of our bloc.

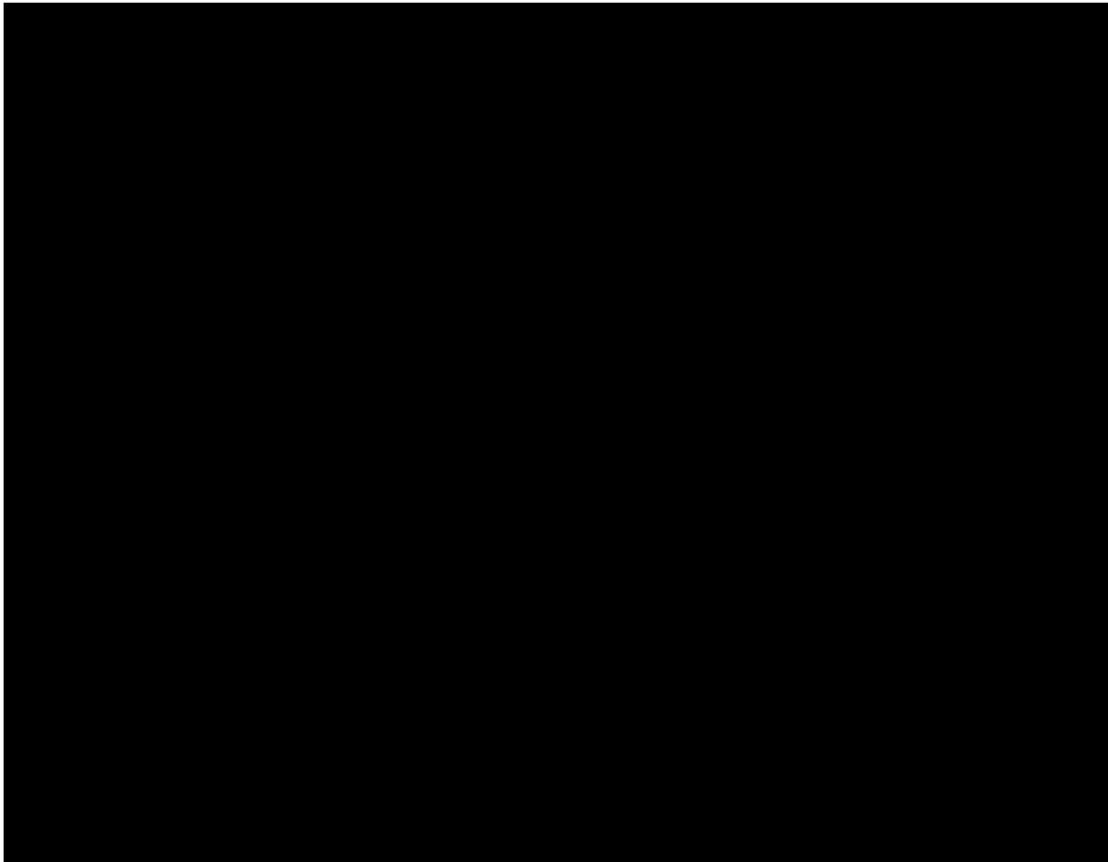
As residents of the Cascades, Flat 16, we respectfully object in the strongest terms to the approval of this application on 368-370 Finchley Road. The danger to all children (including ours) and to **public safety** in general is great. The basement of this bloc has one vehicle access ramp which is approximately 10 meters from the very busy Bus Stop E. The 3 bus lines which stop here transport **children to and from school** and commuters to work. The access ramp to the basement crosses the sidewalk that allows children and other pedestrians to access this bus stop as well as bus stops F & G. This access ramp is located very near to the Hendon Way Junction which is itself very congested and the site sometimes of traffic accidents.

Because of the congestion here, turning right from Finchley Road onto Briardale Gardens Avenue (just a few meters away) is already very restricted ([read here](#)). The point is that northbound delivery vehicles will necessarily be turning directly in front of bus stop E and all the oncoming southbound Finchley Road traffic because there is no place on Finchley Road for these delivery vehicles to park nor turn around. As these delivery vehicles (motorcycles, scooters, etc) will be forced to dart in front of traffic to access the ramp, they will often encounter children, senior citizens and other pedestrians.

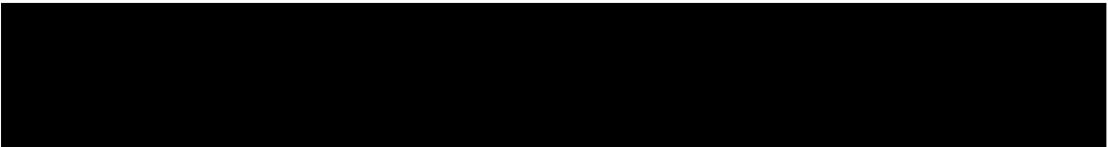
Larger, longer lorries will also back onto the access ramp disrupting traffic and, as we witnessed in the past, the lorries often totally blocked passage along the sidewalk due to their length. In those cases, children and other pedestrians were **forced to walk onto the street** to get around. Furthermore, the noise and air pollution from 7 AM to 11 PM, 7 days a week, from the these vehicles and the honking from impatient drivers would significantly harm our quality of life. I invite you to consult "**Annual Pollution Maps**" at <https://www.londonair.org.uk/london/asp/annualmaps.asp> (please enter postal code NW3 7AJ) which illustrates clearly that we are already suffering from the highest degrees of air pollution. Camden Council already refused to allow underground parking in this same basement just a few short years ago because of the traffic disruption, danger to highway safety and increased pollution. Further, the lease that we hold forbids any commercial activity in this residential building. Clearly, Jiffy has not submitted any assessment of the proposal on highway safety or residential amenity because it would immediately disqualify this activity in a residential building with 22 flats, home to many children.

Thank you for your consideration and to your protection of the welfare of Camden residents.

Lynn and Georges Apple  
Residents of The Cascades, Flat 16  
368-370 Finchley Road  
London NW3 7AJ



**Subject:** Objection 2021/2446/P Jiffy depot



**Re: 2021/2446/P. Re: Basement Floor, 368-370 Cascades Apartments, Finchley Road London, NW3 7AJ.**

**July 17, 2021**

6 pages including one diagram and Appendix 1

Dear Ms Henry,

Please find my objection to 2021/2446/P on the grounds of: damage to residential amenity, highway safety and change of use from residential to commercial use.

## EVIDENCE:

I live in Briardale Gardens, which would be greatly impacted by Jiffy's plan. Briardale is London's first garden suburb street - a narrow street of Edwardian cottages predating Hampstead Garden Suburb. Briardale Gardens is under siege. Being almost opposite the A41 it is *the* back-door rat run into Hampstead, Swiss Cottage and beyond. It is too narrow to cope with multi-directional traffic. Camden ex-head of transport strategy Louise McBride told me that any other Camden street would be blocked off in these conditions. But Barnet Council controls Finchley Rd at this point, and Barnet is hostile to protections. (Appendix 1)

In 2014 I took up the fight against against obscene levels of traffic pouring into Briardale Gardens and adjacent Clorane Gardens from multiple directions, 600+ vehicles hourly pouring in at both ends, causing logjams, cars mounting pavements, occasionally driving along the pavement towards pedestrians, denting and clipping parked cars, dislodging curb stones, hitting garden walls, backing down into moving traffic on Finchley Rd - and worst - nearly killing pedestrians, including children – with daily banal regularity (*Please watch this 1 min video for context*). For years, I have recorded hundreds of hours of video footage, posting on YouTube and emailing videos to the authorities. On Finchley Rd I see dangerous U-turns, traffic reversing into the paths of moving TFL buses, traffic mounting the pavement at Lyndale Avenue bus stop in front of school children and more. The site is next to Lyndale Avenue bus stop, which serves the 139, 328 and 13 buses. School buses to Haberdashers and North London Collegiate pick up and drop off at this point, plus school run drop-offs. **These incidents continue to occur in close proximity to the proposed Jiffy depot.** Not being staged, my footage lacks Hollywood film drama yet testifies to the dangers. In one video a distraught woman (standing at Lyndale Avenue bus stop next to Cascades) describes how a car nearly hit her - she begs the authorities to act. See : [https://youtu.be/luIS\\_ECIAR0](https://youtu.be/luIS_ECIAR0).

It took some time to get Camden's attention, but Camden became convinced and declared its policy to block ingress from Finchley Rd. Then – disaster – it was discovered that Barnet Council controls this small section of the Finchley Rd, (*including, I believe outside Cascades*) up to the merger with A41 when it becomes TFL-controlled. Thus Briardale Gardens and adjacent Clorane Gardens, two tiny Camden streets have their fate dictated by Barnet, whose councillors are unaccountable to us, refuse to engage, and are hostile to controls, using Briardale to siphon traffic from Barnet streets. Camden statistics show that Pattison Rd in Barnet (one road down from Briardale) received **one-tenth** of Briardale's traffic (*See this video containing Camden statistics: 634 cars per hour Briardale Gardens 8-9am 22/9/16; versus 62 cars Pattison Rd*). Siobhan Baillie MP, who was our wonderful councillor can testify to Barnet's utter intransigence. ***It took years of intense battling to gain any concessions. These controls will not be revised/extended and Briardale-Clorane will bear the full brunt should 2021/2446/P be approved.*** In 2018, Briardale got watered-down controls. 6am-10.30am and 3pm-8.30pm Mon-Fri. No protection weekends, mid-day or late evening. Traffic still pours in, netting Barnet Council more than £1m in fines in the first year (Camden gets *nothing* in this rotten arrangement). Meanwhile, traffic on Finchley Rd worsens and diverts into Briardale during uncontrolled hours. Briardale's pollution level is 50 per cent above legal maximum (Camden statistics):

Location						TOTAL
	Date On	Date Off	Time (hr.)	µg/m <sup>3</sup> *	ppb *	µg NO <sub>2</sub>
Briardale Gardens	10/07/2017	01/08/2017	526.08	60.04	31.33	2.30

Camden's 'answer', inexplicably was to stop monitoring pollution levels! **Camden instead should protect Briardale and Hampstead's inner streets by rejecting the Jiffy proposal which will add to already-illegal pollution levels.** This is one of the most crowded and most complex stretches of road in London, on the perimeter of a fragile conservation area. We at Briardale-Clorane are Camden tax-payers and Camden owes a duty of care to our health and safety. The Jiffy proposal would increase health risks from pollution and the physical risk from bodily harm and the mental toll of noise and disruption from vehicles operating late at night. ***All the effort by Camden's officials, councillors and campaigning residents, all the evidence, the proven arguments will be for nought if 2021/2446/P is approved. Camden would be sabotaging its own policy.***

*More than 35,000 cars a day come from Hendon Way merging with yet more traffic at the intersection just up from Cascades. It's going to get worse when Camden approves the massive redevelopment of the 02 centre. All this traffic pressuring the fragile perimeter of a residential Hampstead conservation area.*

*I note that the applicant makes no mention of any traffic issues! Evidently, the applicant either doesn't know or doesn't care. Yet on July 1, 2021, a collision between a TFL bus and two cars took place at 10am just outside the Jiffy site. I took videos of the aftermath and sent them to your Dropbox, please consider these as part of my objection. If the Jiffy plan goes ahead, scooters and bicycles will dart in front of TFL buses in multi-directional traffic and more accidents will happen.*

Jiffy's bikes and electric scooters will prove dangerous to themselves and others. Jiffy has a 15-minute delivery promise. Jiffy drivers (including L learners?) will be pressurised *not* to turn left 1.) to join the inward log-jam on Finchley Rd. Two speedier choices remain: 2.) shoot across the busy pedestrianised pavement into three-way traffic (two-way Finchley Rd, plus vehicles entering from Lyndale Avenue immediately opposite) and *immediately* execute a U-turn into Briardale Gardens, driving into the path of buses, cars and, additionally, pedestrians crossing Briardale. OR – 3.) driving along the pavement past pedestrians at Lyndale Avenue bus stop and turning 'blind' into Briardale. **Please see attached diagram.**

**As I have video evidence of cars mounting, almost leapfrogging over each other on the pavement at this turning, I have no doubt that scooters and bicycles will mount it too.** Thus, even benign-sounding electric bicycles are a danger to others – and to themselves – on this treacherous stretch.

How believable are Jiffy's claims about restricting to bicycles and electric scooters? *Where are the controls, the monitoring, the sanctions?* This 'eco' spin is a back-door way to winning consent which will be quickly followed by Jiffy turning to motorised vehicles. This is not a small operation – Jiffy has £2.6m funding from venture capitalists with large-scale plans throughout London ([Techcrunch.com: London's Jiffy picks up £2.6m seed to enter the grocery dark store race](https://techcrunch.com/2021/07/14/jiffy-picks-up-2-6m-seed-to-enter-the-grocery-dark-store-race/)). *WHEN* motorised vehicles are stealthily brought in, residents will have no protections or remedies. *WHEN* customers run out of liquor at 10.45pm

on a Sunday night, motorbikes will rev up Briardale-Clorane or Platts Lane, waking up children, destroying our right to peace - and we will be powerless.

The site was a care home, recently redeveloped into Cascades flats. At the time Camden refused permission for a basement car park being contrary to its environmental targets. Yet permitting a vehicle-based delivery business will generate more traffic than an underground parking lot for tenants. So Camden would be going against its own logic.

Regarding change of use from residential to commercial use.

The Cascades freeholder clearly wants to maximise income from the basement, their hopes of a resident car park rejected by Camden. What a pity that Camden, the leaseholders and freeholder can't find a sensible solution. For instance, ancillary use for residents such as a gym, pool, tennis court or rentable storage. Or, making the basement habitable. Camden has a severe housing shortage and this is a desirable residential block. It would be contrary to government policy to turn this prime site to commercial use. Better to allow a car park for residents – it would generate far less traffic than the current proposal. Although not a material consideration, Camden should know that a restrictive covenant is in place barring the freeholder from commercial operations. To wit: Title no: NGL952804/Schedule of restrictive covenants 1. (a) 'That no trade manufacture of business (except that of a Surgeon or Physician or Solicitor or Architect) shall at any time hereafter be carried on'. The same clause prohibits 'nuisance or annoyance, injury or damage' to 'the Burgess Estate' 'adjoining property' and 'the neighbourhood'. Leaseholders and affected neighbours will pursue this through the courts.

How does it benefit anyone, apart from lawyers, for Camden to create circumstances for costly litigation causing grief and expense to innocent people?

Yours Sincerely,

Nicole Sochor

33 Briardale Gardens

NW3 7PN