

Application No:	Consultees Name:	Received:	Comment:	Response:
2020/5913/P	Dee Searle	25/08/2021 11:05:23	OBJNOT	<p>Dear Camden Council</p> <p>I am lodging my objection to the revised application to change the use of 3-6 Spring Place, London, NW5 3BA from industrial (Class B2) to storage or distribution (Class B8). The revisions, which consist of widening the loading doors and routing all servicing vehicles (7.5t -18t) to and from the site via Holmes Road and Grafton Road to the south, do not address the multiple concerns with the original application. The ongoing concerns are:</p> <p>1) Safety</p> <p>The proposed change in use to Class B8 would inevitably increase in HGV and LGV traffic on already overloaded streets in a largely residential area, which are already subject to high volumes of Veolia vehicles servicing the Camden Council depot on Spring Place. The primary access and distribution routes chosen by Segro (Grafton Road and Holmes Road) contain two schools, a popular sports centre, accommodation for homeless and vulnerable adults, and student accommodation.</p> <p>The routes also frequently carry pedestrians to and from nearby essential facilities, including a well-used community centre (which provides numerous services for elderly residents), a nursery, two GP practices, two additional sports centres and local shops. In addition, it is highly likely that vehicles will also spill onto Willes Road, which contains the main entrance to Collège Français Bilingue de Londres and the schools entrance to Kentish Town Sports Centre, and carries substantial traffic from the Camden/Veolia depot on Spring Place. The hours Segro has indicated for when LGVs will leave and return to the depot coincide with peak drop-off and pick-off for the schools and nursery, which would cause unavoidable danger to children. Grafton Road, Holmes Road and Willes Road include residential parking and tight corners, creating poor visibility and substantial risk of accidents.</p> <p>In fact there is no safe time for the LGVs to leave and return because the schools and nursery operate staggered start and finish times, and the only routes to and from the proposed depot are populated throughout the day by crocodiles of children from local schools using Kentish Town Sports Centre on Grafton Road/Willes Road and The Dome on Queen's Crescent.</p> <p>Given the time pressures on last-mile delivery operators, there is highly likely that local traffic congestion on Holmes Road and Grafton Road could result in HGVs and LGVs rat-running through even more unsuitable residential streets.</p> <p>Holmes Road itself is of particular concern as the junction with Kentish Town Road is already extremely dangerous for cyclists and pedestrians as traffic tries to get onto or off Kentish Town Road. There is no pedestrian crossing, there are parked cars and motorbikes and, frequently, traffic backing up. Additional HGVs and LGVs travelling in both directions along this route will exacerbate an already fraught situation. Numerous concerns have been raised by residents and community groups about the existing heavy traffic and illegally high pollution on Kentish Town Road. The proposed Spring Place depot will certainly add to these health and safety problems.</p> <p>Also, further consultations are proposed for reducing traffic on Holmes Road and installing cycle lanes in Grafton Road, which already operates a successful contra-flow system to restrict on traffic and involves a narrow chicane by Kiln Place and Oak Village.</p> <p>Spring Place itself is often full of parked Veolia vehicles and clearly unsuitable for any additional traffic.</p> <p>2) Health</p> <p>The application is for 24-hour working, seven days a week at a site adjacent to a block of flats which includes families and almost opposite dense family residential accommodation.</p> <p>The application states that external loading will not be permitted between the hours of 12 am and 5 am, which</p>

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means that HGVs can be arriving, departing and unloading from 5 am until midnight. This may well conflict with Camden's framework hours and in any event is unacceptable in terms of noise, particularly given that numerous studies have linked noise pollution and low-level noise nuisance with physical and mental health problems, including depression and cardio-vascular disease. These hazards are unlikely to be avoided by the proposed widening of the existing loading doors.

Many people more work from home locally because of COVID, which is likely to continue post-pandemic. Neighbours of existing commercial premises in the area have reported that the noise of vehicle reversing and turning even in normal working hours is intrusive and distracting.

As mentioned under 'Safety', the primary HGV and LGV routes run directly past two schools and a sports centre used by local schools. There is now well-established evidence of the damage caused by air pollution from road traffic to children's health and development, including the ruling in December 2020 by Southwark Coroner's Court that air pollution made a 'material contribution' to the death of a nine-year-old girl in South London. Even low-emission and electric vehicles create dangerous particulate matter from their movements, so there is no healthy option for operating a goods distribution depot from Spring Place.

3) Site Management

Segro state that there will be close supervision to ensure that any site occupier complies with all the conditions agreed as part of the letting. Whatever Segro says about how the scheme will operate, in practice they will have no real control over any tenant and are only proposing an annual review of compliance.

Any enforcement is likely to fall on the already over-stretched LB Camden Environmental Health and Planning Departments.

Segro's plans for the site suggest many other uses for this location, all of which would be allowed within the site's existing use class and would provide far less danger, health hazard and nuisance to the local community.

4) Contravening council policies

The Camden Local Plan 2017 states that Camden will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network. It also states: "Major developments dependent upon large goods vehicles will also be resisted in predominantly residential areas."

Overall, it is important to recognise that Segro is the developer and will therefore have no day-to-day control over any eventual operator of the depot. If planning permission is granted, Camden Council will effectively be opening the doors to potential 7-day, 24-hour HGV and LGV traffic on unsuitable, residential streets, resulting in multiple health, safety and environmental hazards.

In summary, this is a poorly researched application which fails to recognise local and borough-wide policies, implications and requirements.

Please refuse this change of use.

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2020/5913/P	Sophie Batoua	25/08/2021 15:30:24	OBJ	I firmly oppose to this application which will lead to more traffic and road danger in an area where three primary schools are located. Young children who are regularly on the street will be exposed to more cars and lorries on very narrow streets. The traffic system and road map is not adapted at all for this situation. I trust that the council will make a sensible decision to protect our children.
