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Application No:	Consultees Name:	Received:	Comment:	Response:
2020/5913/P	Djalila Boumezbear	31/08/2021 01:09:41	OBJNOT	London, 31/08/2021,

Subject: Written objection to SEGRO Planning application for Spring Place (2020/5913/P) as revised on 04/08/2021 (the Application).

Dear Sirs,

[REDACTED] bilingual school at 88 Holmes Road, I am remain unconvinced that the Spring Place site is suitable for B8 storage or distribution use and wish to reiterate the objection raised in my written objection sent to the Council on 26/01/2021. In addition to the arguments raised in my previous letter, which I reiterate due to SEGRO's failure to address any of them satisfactorily, I wish to add the following arguments in objection to the revised application:

The application does not represent effective use of the land and does not propose a sustainable development:

At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. The application does not meet this objective as it is based on short term commercial needs and fails to address any longer-term negative impact it could have on the local community. Testament to this is the fact that despite revisions, the application still fails to address key concerns raised by several hundred objections already made to the application, most of which related to economic, social and environmental concerns:

1) On the economic side, the promise to deliver jobs is not backed by evidence. In fact, warehousing and delivery services often give rise to gig-economy jobs or zero contracts, which might not be attractive to locals living in Camden. As SEGRO plans to sell or rent the premises after completion of the development, it will have no control over that aspect in any event. Instead the land should be used for more value-added activities, more consistent with the strategic location of the site within Camden.

2) On the social and environmental side, the proposed application only offers drawbacks and will cause irreparable damage to the local community - for instance:

Application No: Consultees Name: Received: Comment: Response:

- The land could be more suitably used to support the local community, which has widely opposed the plans. The presence of nurseries, sport centres, schools and close public transport nearby makes this location very attractive to young people, professionals and families, making it more appropriate for other less damaging commercial or residential projects[1]. On the contrary the granting of the application would undermine the quality of life, especially the health and security, of local communities.

- With regards to the environmental objective: we believe the requested application will, if granted, damage the local environment and negatively impact communities:

Due to increased pollution in Holmes Road in particular where more than a thousand children are schooled in two schools -the CFBL and the St Patrick Primary school.

Due to increased congestion and risk of accidents in Holmes Road.

Due to potential impact of increased noise, pollution and vibrations on listed buildings (for instance, the CFBL is a Grade 2 Listed Building) and a conservation area (the Inkerman Area) mere meters away from the site on Spring Road.

None of these concerns have been addressed by the revised application.

The Application inappropriately denies any negative environmental impact on the local community and does not address these concerns:

Protecting the environment and the health of local residents is of paramount importance in any planning application as evidenced by Camden's Policy CC4 (Air quality) and the National Planning Policy Framework's requirements that Councils' planning promote healthy and safe communities. The revised application fails to explain how it will tackle the potential increased pollution it will cause due to increased road traffic:

- Instead it focuses on explaining how last mile delivery could reduce pollution by comparison to other delivery systems, without ever seeking to explain or justify the impact of the proposed change of use for that specific site, on its specific local community. The applicant fails to explain why it should be allowed to operate on the proposed site, next to schools and residential areas, despite suggestions that its project could be more suitably conducted from another site, for instance the Regis Road area.

- Urban last-mile delivery activities are polluting activities which must be pushed away from residential areas. The applicants' willingness to require that whoever uses the site will have to use 25% of electric vehicles on the site 'within 3 years' and commit to internal loading is insufficient. It is not a binding promise and does not seem to apply to HGVs, 25% is not sufficient to mitigate huge pollution increases in the area (in

Application No: Consultees Name: Received:

Comment: Response:

breach with Policy CC1) and no other measures are promised. Even if the applicant sought to enshrine such commitments in contracts with operators of the site, enforcement will likely be difficult and expensive which may mean that the Council would need to intervene. In reality, such a site might require the hiring of independent hauling companies or drivers which will not be bound to such requirements. Promises not to park on nearby roads or pavements and to care for locals and children are effectively promises SEGRO cannot uphold. In case of mortal accident, this is a huge liability for the community, including for the Council, and another key reason to dismiss this ill-conceived application.

2) Noise and pollution caused by 24/7 operation of the site and inappropriate promises to reduce operations at certain hours: The application relates to a 24/7 warehousing service. The operation of such a site will likely create huge noise and pollution with serious adverse effects for local residents and pupils of the local schools. The only mitigation measure proposed by SEGRO seems to be a promise to propose concentrated HGV activities during the night in the early morning. In a context of truck drivers shortage and increased use of last mile deliveries, the ability (and willingness) of SEGRO or its future tenants for the land to stick to such a commitment and not arrive at later times during school drop off is more than questionable. In addition, whoever operates the site would likely hire independent drivers or haulage companies which might not be able to/willing to comply with any such restrictions. This suggests that any commitments on how the site will be operated by a tenant cannot be considered reliable at the decision-stage of the Application.

The Application wrongly claims that the overall daily vehicle numbers would significantly decrease when compared against the past use at the site and the anticipated trip generation as a result of the proposals is considered to be negligible when spread across the course of a day. Furthermore, when comparing the development flows against the baseline traffic flows on surrounding roads, the impact is shown to be immaterial) - specifically:

- The 'past use' of the site referred to seems to be a reference to the use by Addison Lee of the site as vehicle maintenance site until 2016. It is unclear how the applicant could compare use of HGVs and delivery vans on a 24/7 basis (especially for services such as Delivery zoom services) with use by cars for maintenance purposes at set daily hours, and this statement is only based on a guess by the applicant, rather than on any reliable research or methodologies. Instead, we assume that the site operated by Addison Lee could not have allowed as many cars to be maintained per day (operation which would take hours per cars) as the number of vehicle journeys which would be expected to transit from/to the proposed warehousing site. It is also clear that the statement only compares vehicle numbers rather than vehicle journeys or pollution levels, and thus does not rely on an appropriate comparison metric.

- The 'baseline traffic flows' study does not seem to provide reliable information. For instance, it does not set out when such a baseline traffic was assessed and could therefore merely relate to traffic information in the month preceding the revised application (July or early August - after school closure and during a quieter time for traffic in the area), or traffic during one of the lockdowns. In any event, since the application was made in December 2020, it is highly likely that it relies on 'post COVID' traffic numbers which are not representative

Application No: Consultees Name: Received:

Comment: Response:

of traffic flows in normal times.

The proposed change of use will have a negative impact on the health and safety of the community. Under the National Planning Policy Framework, planning policies and decisions should 'promote public safety and take into account wider security and defence requirements, including by) anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate.) The National Framework also dictates that planning applications should promote sustainable transport and 'create places that are safe, secure and attractive - which minimise the scope for conflicts between pedestrians, cyclists and vehicles, avoid unnecessary street clutter, and respond to local character and design standards.) Insofar as the Application has now been revised to focus on new traffic for the operation of the site on Holmes Road and Grafton Road and will increase the risks of accidents for pedestrians and cyclists and conflict with other vehicles, in particular on Holmes Road, it conflicts with these requirements and should be dismissed. Furthermore:

SEGRO's Framework Delivery and Servicing Management Plan proposes that Holmes Road and Grafton Road become the main route for the HGVs used at the site. This statement is not followed by any mitigation strategy to prevent accidents or congestion. Instead a statement that 'a live vehicle tracking exercise has been undertaken by Swain & Sons Ltd with the servicing vehicles likely to serve the site (i.e. 7.5t and 18t) and it was demonstrated that these vehicles can be accommodated comfortably on Grafton Road, Holmes Road and Spring Place' was made which is misleading because: 'accommodated comfortably' merely means that HGVs can go through these narrow roads, however this misses the point that these roads are not suitable for HGV transports due to coexistence with pedestrians (mainly children), cyclists and other cars on already congested roads. The issue is not so much that HGV cannot go through Holmes Road or Grafton Road, but rather whether HGVs and other delivery vehicles used once the site is in operation can operate on that road safely; and This statement does not specify when or how the live tracking exercise was undertaken and thus lacks in objectivity or reliability. Since this was done in response to comments made by the Council in March and April, it could relate to traffic during April, June or July/August holiday, which would create distorted results.

Recent press reports show that explosions at warehousing sites are not uncommon and can cause very serious damage to neighbouring houses or land. [2] The proposed application does not consider any such risks, and for instance does not include any plan, for instance, for fire sprinklers or fire alarms. The mere possibility of such explosions or huge fires mere meters away from schools and nurseries (for instance the CFBL is 80 metres away from the site) and the risk to the lives of local residents and children is a risk the Council should not allow in any circumstances. This is another reason why this site is not suitable for the operation of a last-mile delivery depot or warehouse.

The application misrepresents Camden's Planning Framework and is inconsistent with this framework:

Application No: Consultees Name: Received:

Comment: Response:

1) SEGRO's application misrepresents the Kentish Town Potential Development Area (KTPDA) by including Holmes Road and Grafton Road into the KTPDA, which in fact excludes both.

2) Policy T2, like the planned design for the KTPDA around Regis Road, propose that Camden should only allow car-free developments. The applicant mistakenly claims that its proposed development will be car-free due to the use of on-site parking. This is because Policy T2 should be read in line with Policy CC4 on Air Quality and should mean that on-site parking should only be permitted where essential. The operation of a distribution service in Spring place is not essential and will be inconsistent with such policies. Consistently with the Camden Local Plan 2017 (the lPlanl), Camden must resist any development which fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network, especially "major developments dependent upon large goods vehicles will also be resisted in predominantly

residential areas."

The application is inconsistent with key strategic objectives of Camden's Plan, including: the second objective of 'securing safe, socially mixed and balanced areas with strong, cohesive and resilient communities' and 'provision of the accessible facilities and services needed to meet community needs'; the 8th strategic objective of promoting sustainable transport for all and making Camden a better place to cycle and walk around, to reduce air pollution and reliance on cars and congestion; the 11th objective of improving the health and wellbeing of Camden's population and support for healthier lifestyles and environmental improvements; and the 12th objective of promoting and protecting the high levels of amenity and quality of life in Camden.

The application is inconsistent with other initiatives in the area:

1) The SEGRO / Vectos transport report suggests a route for larger heavy goods vehicles (HGVs) via Grafton Road and Queens Crescent. The Kentish Town Planning Framework (page 74) illustrates all of Grafton Road as part of the lLondon Cycle Networkl. Camden's Cycle Action Plan, within of the Transport Strategy, describes Grafton Road as part of Camden's Strategic Cycle Network and it is shown as a proposed cycle 'quietway' making this road unsuitable for heavy goods vehicles. Grafton Road also forms part of a conservation area. The application fails to address how it will mitigate negative impact on such plans and on the conservation area, and must be dismissed as it will negatively impact such initiatives as well as the character of the Grafton and Holmes Road areas.

2) Future development plans for the Veolia site (on Holmes Road, opposite the application site): Policy SSP6 of the Kentish Town Neighbourhood Plan specifically refers to 'Retention of existing employment space

Application No: Consultees Name: Received:

Comment: Response:

by creating new workspace for the creative sector to complement the creative businesses in nearby Spring Place* -> and not B8 (storage or distribution) as wrongly claimed in the Application. In addition, Camden's Future Development plans for the Veolia Council Depot Site include plans to allow a Class C3 use (Houses, Flats, Apartments) on that site including Community facilities, on-site cycle parking facilities, enhanced public realm including improved pavements and cycling lane links at junctions with Spring Place and Holmes Road, all of which are totally inconsistent with the Application.

3) Application for Holmes Road to become a Healthy School Street. The safety and pollution situation of Holmes Road is a known issue to the Council and relatively recent applications to transform Holmes Road into a Healthy School Street are currently under serious consideration, which testify of the acuity of the traffic problems on the road. Although the revised Application includes a statement that SEGRO is willing to work with the Council to improve safety at the junction between Holmes Road and Kentish Town Road, it does not propose any further cooperation to increase safety closer to the schools on that street. Making of Holmes Road a Healthy School Street would allow the reduction of car journeys on that street to reduce air pollution and cut down on traffic. Camden should not fetter its decision-making powers on that point by granting the Application which is totally inconsistent with a Healthy School street decision.

It must be highlighted that the measure proposed by SEGRO to reduce operating hours between 08:00-09:45 AM and 03:15-04:15 PM on Holmes Road are, once again, inappropriate and won't address the traffic issues/risks on Holmes Road, including because:

this statement only applies to 'servicing vehicles', which refers to HGVs, but not to all other vans or vehicles which will subsequently be used for deliveries. If the rumours that the site could be used by firms like Ocado for Zoom services are true (i.e. within the hour local deliveries), this means that this promise only apply to a fraction of the anticipated traffic from/to the site and that high levels of traffic would be caused including at core school hours.

The promised restricted hours ignore the reality on Holmes Road which is that:

Pupils and their parents have staggered start and end times : start times are staggered all morning and the day ends at different times between 11.30 am to 6 pm (depending on the days, classes and after-schools plans to which each child is registered);

CFBL pupils walk at different times, during school hours, past Spring place to go to the local swimming pool and diverse sport grounds (since the CFBL does not have its own facilities); and
Traffic is bad at all hours on Holmes Road, but likely to worsen due to other traffic restrictions due to take effect soon in the area.

D. Bad faith of the applicant and reliability of its commitments:

Application No: Consultees Name: Received:

Comment: Response:

Finally, it is worth noting that the Application was strategically updated during school holiday, on 04/08/2021 despite the fact it responds to comments made by Camden representatives on 05/03/2021. The application and its amended version almost totally ignore the existence of schools, student accommodations and nurseries in the area, especially on Holmes Road. This cannot be unintentional. What it anyway shows is that the Application totally disregards the interests of local residents or local schools.

The token promises made in the revised Application seem unreliable as the applicant knows how difficult it could be in practice to ensure compliance by tenants (or third parties) with restrictive covenants. Camden Council should conclude that the application cannot be granted based on loose or unenforceable commitments. In any event, the proposed change of use and application remain in general unacceptable.

For all the reasons stated in this letter I beg the Council to reject the application.

Kind regards,

Djalila Boumezbeur

[1] SEGRO already secured a permission to use the land for residential purposes. The land would be most suitable for residential purposes, in the context of a lack of land available in the Council for housing development, as shown by the 2021 Housing Delivery Test (HDT) which showed that Camden was behind its Housing Delivery Target for 2020.

[2] See for instance in the last two years: <https://www.bbc.co.uk/news/uk-england-hampshire-47151773>, <https://www.bbc.co.uk/news/business-57883332>, <https://www.express.co.uk/news/uk/1359596/amazon-warehouse-fire-firefighters-jeff-bezos-five-s-Amazon-site-Duloch-crime-updates-ont>. Also see this and this in relation to a report by Zurich Insurance which acknowledges the risk of warehousing fire as a substantial operational risk in urban centres.

2020/5913/P Anne-Claire Lucas 30/08/2021 21:45:14 OBJ

I would like to object this planning application. It would increase traffic in Holmes road just at the entrance of the CFBL primary school.
This area is already congested in the morning.
