

Mohammed Ahmed

From: Djalila Boumezbeur [REDACTED]
Sent: 31 August 2021 01:05
To: Planning Planning
Subject: Written objection to SEGRO Planning application for Spring Place (2020/5913/P) as revised on 04/08/2021 (the Application).

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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,

As a parent of two children attending the CFBL, a bilingual school at [REDACTED], 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:

A. 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:

∞ 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:

1.
 - 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.

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

1. 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 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.

3. 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 of traffic flows in normal times.

4. 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 of 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:

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- “*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.

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

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 'Plan'), 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."

D. 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.

E. 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 Queen's Crescent. The Kentish Town Planning Framework (page 74) illustrates all of Grafton Road as part of the 'London Cycle Network'. 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 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 or 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:

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-fife-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.

Le mar. 26 janv. 2021 à 6:58 PM, <planning@camden.gov.uk> a écrit :

Dear Sirs,

I object to this application as the parent of two children attending a school (the CFBL, exactly 80.43m/263.87 ft away from this site) for the development of this site as storage or distribution (Class B8)/ light industrial (Class E). The CFBL is an Outstanding Ofsted rated school which includes a nursery, a primary school and a secondary school and hosts more than 700 pupils aged between 2 and 14 years old. The plan probably also affects the nearby St Patrick Catholic Primary School, as well as access and exit from the Kentish Town Police Station (both also in Holmes Road). I believe the granting of the application would present a serious health, safety and environmental risk to the local community, but would like to highlight the reasons for my objection based on its specific impact to children, staff and teachers of the CFBL. However, the arguments detailed below also apply to many residents or children of the affected area as well.

To summarise, the construction work would cause horrible pollution, noise and traffic which could endanger the health of children in the school. It is obvious that once converted, the site operation would induce even more pollution, noise and vibrations. It would also negatively impact a conservation area, endanger a Grade 2 listed building and create a serious safety road risks for all residents as well as all children schooled in the area.

1. Noise, vibrations and nuisance:

Noise is a recognised nuisance which can affect children and residents in the area. Vibration is also a problem, especially where heavy vehicles and high levels of traffic are expected to circulate. Both would be very high, as admitted in the planning application's health assessment – which notably remains silent on the school and fails to consider the impact of the planned works and outcome on children in the area (including the CFBL), and could degrade the quality of the air, noise and environment immediately opposite from our children's school. The proposed application implies that the site could be used as a 24 hour warehouse/distribution centre which would mean constant noise and vibration with devastating effects for locals and children.

2. Road Safety Issues:

The planning application proposes the use of Holmes Road – which is the main access and address of the CFBL (at No 87) – as primary road for access by “smaller HGVs (7.5t)”. The planning shows that the secondary road could be used instead “during school morning and afternoon peaks” which shows that the applicants are aware of potential impact or risk to children of the CFBL and St Patrick schools, both using Holmes Road as main entrance. In spite of this, the application does not detail any measure or assessment of the safety (or environmental impact – we’ll get to it later) on these children. The transport statement appended to the application itself relies on the prospect of potential change of the character of the area and potential redevelopments of access points, obviously because current access points and the current residential nature of the area are not currently suitable for the application. It is therefore not reliant on currently existing conditions but on inducing such a potential change.

In any event, Holmes Road should not be a primary access road (or even a secondary or access at all) for this application. Holmes Road is a narrow road with small pavements and heavy foot traffic – mainly by children attending the schools on that road or students living in students’ accommodations also on Holmes Road. A visit to the street on a normal school day (without COVID lockdown) would show that the road is already risky to children with high traffic jamming the road, pavements full of children and families waiting to get into their schools and limited crossing areas. The CFBL is the only bilingual school in this area of London so parents and children often commute from long or less long distances and bicycles, scooters, school buses and cars often clog Holmes Road and the nearby streets. Even outside schools pick up or drop off hours, traffic is high on Holmes Road as a key access point to Kentish Town Road. It is unavoidable that all trucks and cars used for the construction and later for the distribution centre would use this road, and therefore cause increased traffic and accidents risks. Parents who drop off their children, school buses used by the school (for instance for sports as the school does not have its own sites) would also find it impossible to access the school. Above all, risks of road accidents which could kill children would increase tremendously.

To clarify why, it is important to understand that reversing or turning on Holmes Road, which is rather narrow, will probably be near possible to HGVs – which are too big for Holmes Road and nearby roads and have notorious blind spots. Cars or HGVs blocked/slowed down in such a configuration could have to reverse or turn on or near the schools’ entrance itself (or the pavement leading to it). In the morning and the afternoon, more than 700 children arrive on Holmes Street, Cathcart Street and Willes Road and the pavement on Holmes Road is so full that they often ‘spill’ on the corresponding roads themselves. With social distancing required since the start of the COVID 19 crisis, more ‘road space’ by children and parents waiting to get in or out of the school, although this has only made worsened a pre-existing situation. Older children may not always be supervised either. Such large number of children at the same time in the morning and afternoon means that Holmes Road and its nearby roads should in fact totally be closed to traffic, not open to more traffic and especially not to HGVs traffic. The application’s proposal to have Holmes Road as a main street is simply unacceptable as it creates very high risk to the schools’ children safety.

Contrary to what the application suggests, limited cars use the Veolia access point on Holmes Road. When they do, this creates traffic jams and immediate road blockages. The granting of the application would make render things substantially worse and unsustainable.

In addition to the above, the application would increase road traffic in general, in a context where the Camden Local Plan (2017) itself proposes to “require all new developments to be car free”. (Policy T2). This application therefore shall not be allowed for this reason as well. It is clear that Camden Council should seek to dissuade rather than encourage further use of Holmes Road for access to the proposed site.

3. Lack of assessment or measures to prevent fire hazard and risks to locals and the CFBL: HGVs typically produce more pollution than any other smaller vehicles, use highly polluting fuel such as diesel fuel. A distribution centre would probably have to have its own fuel tanks for the fleet of cars, vans or HGVs it intends to host. Such tanks would also create serious health and fire hazard in such a small street/neighbourhood. The application also includes the creation of “electric vehicle charging points and/or

hydrogen refuelling facilities”, but no risk assessments of such facilities at such a close proximity from a school. We have not seen anything to protect the children or local inhabitants in case of accident or explosion on the site, which is a serious oversight and shows the lack of care taken in preparing the application. Huge fires caused by charging units are a real risk to consider, as evidenced by the fire which destroyed an Ocado Warehouse and distribution center in April 2019 (as reported here: <https://www.bbc.co.uk/news/uk-england-hampshire-48094801>); in this case a 500m exclusion zone was set up but the warehouse was not close to inhabitations or schools. This case illustrates the real risks of having such a site near housings or schools, and should be another reason to refuse such a use on the site.

4. Pollution Risks to children between 2 and 14 years old:

The CFBL operates a nursery, primary school and secondary school 80 meters away from the site; it currently hosts more than 700 pupils. The application contains no acknowledgement of this situation and no impact assessment on the children and school staff, despite recognising the existence of schools in its maps. This is unacceptable but probably a sign that any such assessment would have to confess to causing serious pollution and health risks to children studying or playing mere meters from what the application proposed as its primary road for HGVs.

Publicly available data regarding pollution in the area shows that pollution levels in the area of Prince of Wales Road and Grafton Road is c. 54 μ gm³ with a range of 50-59, by contrast for the same date pollution in Willes Road (next to our school) was 37 μ gm³ with a range of less than 30. This difference suggests how much more pollution could be caused by the new site (although it is clear that the site would cause more pollution than are currently noticed at the corner of Prince of Wales Road and Grafton Road considering that HGVs are very are at the moment in this area). Such levels of pollution are already well above WHO recommended levels. Camden Council and the Mayor of London have recently written to the Government to push it to adopt levels recommended by the WHO and both promised more efforts to protect children and schools from pollution in recent public policy declarations. These positions should weight in favour of rejecting the application, as otherwise the Council would be supporting a project at odds with its own schools and environmental policies.

Overall, the increased pollution and air quality would stunt the growth of our children’s lungs, worsen chronic illness, such as asthma, lung and heart disease, which already affect some of my children’s friends. Increased pollution is also known to increase the risk of mental health issues, something we would wish to avoid to children already unfairly mentally affected by school closures and COVID-19. Trucks driving mere meters from two schools and their playground, noise pollution and constant vibration which could affect lessons and endanger children's health or cause increased stress and anxiety. Camden council should prioritise the interests of vulnerable children.

The CFBL is already too close to Kentish Town Road, which has some of the highest pollution levels in Camden (and in the UK). Adding the pollution caused by the proposed distribution site (where HGVs and vans will emit high levels of Nitrogen Oxides and PM emissions) would mean our children's schools will be put at very high risk of high pollution levels.

5. Negative impact on a Grade 2 listed building:

The site the CFBL is a Grade II listed building. The creation of the distribution centre may affect its quality and, for instance due to HGV produced vibrations, could imperil its foundations or structure.

6. Negative effect on a Conservation Area:

The area bounded to the south by Prince of Wales Road and Anglers Lane, to the north by Holmes Road, to the east by Raglan Street and to the west by the railway viaduct forms a Conservation Area known as the Inkerman Conservation area. The Inkerman Road Conservation Area forms a dense and homogenous environment in the heart of Kentish Town, mainly residential. Although the proposed site for the application is currently used as a taxi park, the proposed change of use to [] would allow a new use very different from this residential area. This could create a dangerous precedent, but in itself would create serious adverse effects on the character and appearance of the Conservation Area, by making it more

polluted, less quiet and threatening its architectural style and integrity. The Inkerman Conservation Area is not a commercial area, but a residential area where families and students live. The property affected by the plan was originally planned to be developed for residential buildings development, which attests that the owners also saw the area as a good residential area which they initially wished to develop. A distribution or industrial site would destroy the character of this neighbourhood.

7. Timing of the application/unfair consultation process:

It is shocking for this planning permission and deadline for opposition to be so short considering the schools affected (2 other schools are in the area) are all currently closed. This is because parents who do not live in very near proximity of the site might not have heard of the application, when this type of news would have at least circulated at pick up/collection times. Whether intentional or not, this short deadline is unfair. I hope that the readers of this objection understand that should the objection deadlines be extended to a later time, after schools have reopened and parents have had the time to be made aware of the application, this would create a fairer opportunity for all relevant stakeholders to properly present their objections to what is a truly shocking application.

I therefore hope this consultation will be extended accordingly.

Thank you for taking the time to consider this objection.

Sincerely,

Djalila Boumezbeur

Comments made by Djalila Boumezbeur of [REDACTED]

[REDACTED]
Preferred Method of Contact is Email

Comment Type is Objection