

**Dr Elizabeth Hill
4, Raglan Street,
London NW5 3DA**

1st September 2021

Planning Services,
London Borough of Camden
5, Pancras Square
London NC1 4AG
David.PeresDaCosta@camden.gov.uk

re: 2020/5913/P 3-6 Spring Place NW5 3BA

Dear David Peres de Costa,

I am sending you a further letter of objection to the Application 2020/5913/P for 3-6 Spring Place, in addition to my previous objection to the initial plan for Segro's 'last mile operation'.

The plan for 3-6 Spring Place makes a mockery of the council's and the mayor's actions in reducing both traffic AND pollution in the area by introducing nearly 100 unnecessary vehicle journeys daily on to Holmes Road, Willes Road and Grafton Road. Although Segro have attempted to amend their original planning application with assurances, it is clear that Holmes Road and Grafton Road will suffer from even more traffic than proposed in the previous application.

In various ways Segro's *Responses to Highways Comments* does not bear scrutiny. Although they claim in table 1 that "The level of traffic as a result of the development will generate negligible amounts of traffic on Holmes Road." and "The likely level of traffic anticipated on Grafton Road is negligible." Yet their own plan (Table 2) shows 92 vehicle transits daily, including ten servicing vehicles of up to EIGHTEEN tons – hardly "negligible". They propose a maximum of eighteen HGV trips per day – again, hardly "negligible". In this document Segro now confirm that:

Table 1 - "The revised scheme means that all servicing vehicles will route to/from the site via Holmes Road and Grafton Road to the south". Their reference to 'servicing vehicles' means transporters of up to 18 tons. The narrow Holmes Road, heavily used by pedestrians including children from the two schools (St Patrick's Catholic Primary School and the College Francais Bilingue de Londres) located on it, is quite unsuitable for such a heavy delivery business.

Table 1 also states "Notwithstanding this, SEGRO is proposing in the framework DSMP to restrict servicing vehicles (7.5t-18t) travelling on Holmes Road between the hours 0800-0945 and 1515-1615 to avoid school times."

Yet their estimate in Table 3 shows 22 fleet vehicles between 9 and 10am.

Table 2 shows 42 vehicles travelling between 9 and 11 am, with 82 vehicles between 9am and 1pm. Hardly negligible!

This is all in circumstances where the council is intending imminently to block the junction of Anglers Lane on to Kentish Town Road which will eliminate the rat run of Anglers Lane and further increase the traffic load on Holmes Road, now one of the few exits from the area. It is already choked many times in the day. Frustrated drivers will be encouraged to find new rat runs down Willes Road or Cathcart Street.

Point 38 confirms that Willes Road (as well as Grafton Road and Holmes Road) will be a key access route south for departing vehicles. Yet, with the exception of the back of the Kentish Town Sports Centre, this is an entirely residential street and part of the Inkerman Conservation Area – wholly unsuitable as a rat run for regular servicing vehicles.

In their document, Segro make comparison with the previous use by Addison Lee. This is facile and irrelevant – Addison Lee was a hire car company servicing its cars, not a delivery company using 18 ton transporters and myriads of nippy vans zipping hither and thither.

I disagree with Segro's comments on the Willes Road/ Holmes Road junction. Drivers and cyclists regularly ignore the white lines and race over the 'dog leg'; it is an accident waiting to happen.

Segro's plan shows heavy servicing vehicles, up to 18 tons, arriving as early as 5am and as late as 11pm - wholly unsuitable for a predominantly residential area.

Point 71 – Segro commits to reducing points of impact of the proposal. As owner but not user of the site, how do they plan to police these? As they note in point 15 under Own Driver Franchise Model "As the end occupier of the site is not known at this stage, it is difficult to predict the final model the future occupier will use and exactly when vehicles will arrive to and depart from the site."

A great deal is as yet unknown. As site owner, with unknown end occupier, Segro do not explain how they intend to monitor to ensure compliance with their plan by both the site tenant and their own driver franchise operatives. What happens when there are small delivery vehicles under time pressure racing along Willes Road? What happens when Holmes Road is choked and these drivers are under pressure to deliver? What happens when the George 1V pub on the corner of Willes Road/ Holmes Road is refurbished?

Despite the assurances of Segro, it is clear that a great deal of additional polluting and disturbing traffic will route along Holmes Road, Grafton Road, and the residential Willes Road from very early morning to late at night.

As a local resident, I urge you to reject this application in its entirety

Please acknowledge receipt of my letter and keep me informed about the progress of the application.

Yours sincerely,

Elizabeth Hill