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**To:** Planning Planning  
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1. SEGRO applies for a continuous B2 plus B8 use. at Spring Place SEGRO is not intimidated by the number of objections. It continues to push for B2 and B8 use.
2. SEGRO suggests a business model that is based on (additional) traffic – at the moment the industrial site at Spring Place is empty, and causes zero traffic. The application claims that the additional traffic that SEGRO's future B8 tenants would create is negligible. No pressure would be placed on traffic in the surrounding streets and that the little additional traffic has no impact on health, safety of residents, students, and children nor does it contribute to traffic congestion on the surrounding residential streets..
3. This is "proven" in an assessment that concentrates on a specific case study (DPD in Westminster), based on a model with 100% emissions-free vehicles and reduced operating hours. But SEGRO does not volunteer similar restrictions at Spring Place.
4. Although SEGRO conducted its own study of traffic movements on Holmes Rd, Grafton Rd, Kentish Town Rd etc in February 2021, the results of the study were not submitted in the amended application/assessments. It would be helpful to know what the results were and why SEGRO did not submit them in the framework of the amended application.
5. Contrary to the submitted specific assessment (DPD in Westminster), Segro as landlord chooses to have little control regarding the numbers of vehicles, number of movements, types of vehicles or routes taken by these vehicles - on the contrary the planning application asks for permission for an operation that operates almost 24/7.
6. SEGRO is the UK's biggest warehouse operator whose tenants are among others, Amazon and Ocado, I wonder if this is a landmark application that would catapult stock market giant SEGRO into central London. It would create a precedent for future applications (according to business reports, SEGRO has already purchased other sites – although not as central as Spring Place.) It is surprising to see that SEGRO commits to work with the communities yet is not prepared to suggest restrictions for its business – it is disdainful to suggest that residents can survive with 24/7 of constant traffic and need no rest at night or on weekends. – To suggest otherwise – no additional traffic will be caused – is not only misleading but arrogant – yet traffic that filters into the whole neighbourhood has become a very sensitive agenda in our post-pandemic world.

SEGRO's amendments have not altered their application in any substantial way. The problem remains that the chosen site for last-mile-delivery is in the wrong location, and that there would be no possibility to control such a problematic B8 use. This is why I continue to oppose SEGRO's amended application for B8 use.

The site is in a residential area with already grave existing traffic problems (congestion all the way up to Kentish Town Road), a very high percentage of young people under 25s (2000, or so, students, pupils and nursery children) who would suffer disproportionately from air pollution, and a business model that allows for very little control. SEGRO as landlord exercising power by a yearly review would not be able to guarantee the number of vehicles in use, nor the timings or the use of the proposed routes.

It would be up to the little time of residents to control the operation ... Plus, there is a major delivery company that operates in this area already (UPS), plus an end-customer-delivery company (Gorillas), etc. There is simply no physical space for more vehicles.

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