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Consultation Response Review Note

3-6 Spring Place, 194587-10/N07

November 2021

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1. A planning application (Ref: 2020/5913/P) was submitted in January 2021 for the change of use of an existing industrial unit (Class B2) to flexible industrial (Class B2)/ storage or distribution (Class B8)/ light industrial (Class E). The application was supported by a Transport Statement (TS), Delivery and Servicing Management Plan (DSMP) and Travel Plan Statement (TPS).

2. Following submission of the planning application (Ref: 2020/5913/P), further consultation with LBC and key stakeholders including local residents' groups was undertaken. As a result, changes to the scheme are proposed, which includes an amended access strategy to facilitate on-site loading and remove any need for on-street loading. The amended proposals are detailed within the Transport Statement dated August 2021.

3. Following submission of the revised transport documents, the proposals has been subject to extensive representations by local residents and stakeholders. A full list of comments is provided at **Appendix A**, which also includes a response to the comments raised.

4. It should be noted that a signifcant number of responses do not take into account the revised scheme and are based on the previous proposals. Notwithstanding this, some general themes/concerns have been identified:

    I. Suitability of surrounding roads to carry development traffic

    II. Traffic impact and congestion on surrounding roads

    III. Vicinity of schools and safety concerns for pedestrians, particularly school children

    IV. How will the Council enforce the restrictions associated with the proposals

5. This Note provides a response to the key transport themes/concerns identified above.

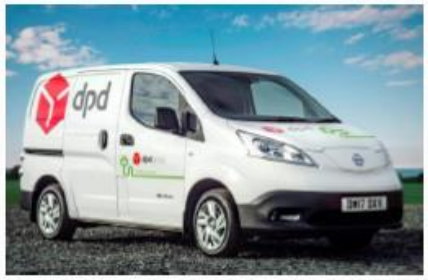
Suitability of Surrounding Roads

6. Firstly, it should be noted that whilst it is acknowledged that there is a requirement for healthy streets proposals to promote walking and cycling, it is also important to note that there is still a need to safeguard vehicular access on roads for industrial and commercial uses so that key services can be undertaken. As such, it is important to maintain existing vehicle access on surrounding roads to the site, particularly given it is an existing employment site.

7. When considering the types of vehicles that will serve the site, these will comprise servicing vehicles and delivery fleet vehicles. For context, **examples** of the type of vehicles that will serve the site are shown below.

Delivery fleet vehicles:

3.5t Vehicle (circa 5.5m long):



Mercedes-Benz Sprinter Van (circa 6m long):

Servicing Vehicles:

7.5t Vehicle (circa 7.2m long):

18t Vehicle (circa 10m long):

8. Servicing (larger) vehicles will route via:

    1. Holmes Road
    2. Grafton Road

9. Delivery Vehicle Fleet vehicles will route via:

    1. Holmes Road
    2. Grafton Road
    3. Willes Road
    4. Athlone Street

10. As part of feasibility studies and due diligence for the site, a live tracking exercise (vehicles of the size that would be used driven to/from the site), and swept path analyses were undertaken of roads that provide access to the site and it was found that all roads could accommodate the type of vehicles that will serve the development. To clarify, Queens Crescent will not be used as a route for development traffic and Gillies Street will be only be used by delivery fleet vehicles, but it is anticipated that this will not be a significant number (max of 3 in an hour and 11 across a day).

11. Further information on the level of traffic using each route, is detailed under the heading **Traffic Impact** and in the submitted Transport Statement.

12. As part of the Kentish Town Planning Framework (KTPF) a Kentish Town Access Study was produced to inform the KTPF. Whilst the focus area is on the designated sites; The Murphy Site and The Regis Road Site, it provides details on the wider area including opportunities and constraints. The Access Study states with regard to Holmes Road, Spring Place and Arctic Road that:

    "Each of these accesses offer a useful potential point of vehicle access but are not suitable for significant volumes of HGVs. It could therefore provide access to residential, office and low HGV traffic generating industrial uses. Considering the low existing traffic flows

along these roads, there would be no capacity constraint at the accesses, however more traffic would travel through local junctions, such as Holmes Road / Kentish Town Road. Use of these accesses could reduce traffic using the Regis Road access."

13. The Access Study therefore supports that Holmes Road and Spring Place are suitable to carry vehicular traffic and can provide access for low levels of HGV traffic as anticipated as a result of the development proposals at 3-6 Spring Place.

14. The use of surrounding roads by vehicles is further supported as the site is an existing employment site, with an existing B2 use. As such vehicles serving the site have historically been using surrounding roads such as Spring Place, Holmes Road and Grafton Road to gain access to the site as they are the only roads that provide access to the site.

15. If the B2 use came back into operation, it has been demonstrated through previous surveys of the Addison Lee operation that an upwards of 180 vehicles could be expected a day. With regard to the surveys of the Addison Lee operation, they were undertaken by an independent third party survey company and were accepted by LBC as part of the supporting evidence for the planning previous planning consent on site. The numbers have also since been checked with Addison Lee, who have confirmed the data is accurate.

16. In addition to the above, the adjacent Veolia use (this operation is to provide Council services) results in a number of vehicular movements which also use the surrounding roads, which further supports that they are suitable to accommodate the anticipated vehicles as part of the proposed development.

Traffic Impact

17. Detailed traffic analysis was included as part of the Transport Statement, submitted as part of the application. This set out that the potential B8 use is anticipated to result is 5 servicing vehicle (7.5t/18t) movements a day and 41 delivery fleet vehicles a day. When these are dispersed across surrounding roads in the area throughout the day the impact on the roads will be not be material.

18. If these anticipated traffic flows are compared against the trip generating potential of the previous B2 use, then it is evident that there would be a significant reduction in total vehicle movements. Larger servicing vehicles would also see a small reduction (from 6 vehicles to 5 vehicles).

19. Traffic surveys of surrounding roads (Spring Place, Athlone Street, Holmes Road, Grafton Road and Willes Road) were undertaken in April 2021 to establish baseline traffic flows in the area. As presented in the TS, increases in traffic on these roads would not be significant and well within daily fluctuations roads such as these typically experience.

20. The Framework DSMP also commits any future user to the following:

- The development shall not be served by vehicles over 18 tonnes including articulated HGVs.
- The development shall be served by a maximum of 9 HGVs (18 two-way trips) per day (Note: this is the number generated by the Class E/B2 use and not the B8 use).

21. A detailed Framework Delivery and Servicing Management Plan (DSMP) has been submitted as part of the planning application to provide a framework for managing all types of vehicle movements to and from the site.

22. In addition, all vehicular activity associated with the development proposals will be on-site and there will be no requirement for any on-street loading. It is noteworthy that the previous B2 use had some on-street loading activity and as such the proposed development results in a betterment when compared against the previous use.

23. It should also be noted that SEGRO are making a commitment that 25% of its vehicle fleet will be electric or otherwise emission free. The London Plan stipulates that 20% of parking should be provided with active charging facilities and as such this commitment exceeds London Plan standards. Furthermore, the SEGRO 'Sustainability and Zero Emission Vehicle Technology Roadmap' (attached at **Appendix B**) sets out SEGRO's sustainability ambitions as well the current position on electric vehicles at similar uses to what is proposed here. When referring to this document, it is evident that the 25% EV fleet is suitably ambitious. As the market availability and technology improves it is the aspiration of SEGRO to increase the electrification of the fleet at the site.

Vicinity of Schools

24. The College Francais Bilingue de Londres (CFBL) and St Patrick's Catholic Primary School are located in relatively close proximity to the site located off Holmes Road and Willes Road. It is noted that the location of these schools is not uncommon in built up urban locations such as this and there are often a range of other uses including employment in close proximity. In addition, there are currently no other restrictions relating to other commercial vehicles on these roads, so it is unreasonable to restrict use to an existing local employment site. Notwithstanding this, the work undertaken to date and summarised below demonstrates they these roads are suitable and SEGRO has committed to additional restrictions to address concerns.

25. 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. In any case, all traffic (irrespective of the ODF or overnight model) is likely to travel outside of peak school times. As noted, the site is an existing employment site, which is subject no restrictions on times that vehicles

can service the site. Given the proposals introduce these restrictions, it is evident that the proposals result in a betterment to the existing position.

26. Traffic surveys were commissioned in May 2021 between 0700-1000 and 1400-1800 to record drop-off/pick-up activity associated with schools in the vicinity of the site.

27. The results of the survey show that the main time period of drop-offs occurred between 0820 and 0840 for circa 20 mins before vehicle drop-off activity falls off again. The main pick-up times occurred more sporadically between 1520 and 1525, 1545 and 1550, and 1610 and 1615. This could be attributed to after school clubs for example.

28. On the basis of the above, that restrictions the Applicant is willing to commit to on Holmes Road between 0800 and 0945 and 1515-1615, are sufficient in avoiding the busiest school periods. It is important to note that the busy periods are for short, concentrated lengths of time and not for prolonged periods. These results of the surveys are supported by on-site observations, where it was noted that there were concentrated busy periods which did not last for a substantial time, which is typical of most schools in the country and does not generally cause signifcant increase to delay or congestion for long periods.

29. As set out under the traffic impact section, the anticipated level of traffic will not be expected and information within the TS shows that Holmes Road will experience approximately 8 vehicles in an hour and 30 movements across a typical day. This level of traffic is not significant.

30. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few accidents recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.

Enforcement

31. A detailed Framework Delivery and Servicing Management Plan (DSMP) has been submitted as part of the planning application to provide a framework for managing all types of vehicle movements to and from the site.

32. The submitted DSMP states that an annual monitoring report will be undertaken, however, it is now proposed to undertake monitoring reports and surveys (a count of commercial traffic at the site) every 6 months. These will be undertaken in line with TfL guidance for a period of 5 years. The first survey will take place 3 months after first occupation and the 6 monthly surveys will thereby be undertaken from that point.

33. There are a number of examples where restrictions to the type and number of vehicles and routing of vehicles have been implemented either through planning conditions/obligations or Operational Management Plans/Delivery and Servicing Management Plans. One of these examples relates to a Deliveroo site in Swiss Cottage, which is located within the London Borough of Camden.

34. Development proposals at this site went to Appeal (Ref: APP/X5210/C/18/3206954) which was subsequently allowed in September 2019 subject to a number of planning conditions and obligations. One of these relates to the implementation of an Operational Management Plan, which is required to detail the control of delivery vehicles, the conduct of delivery drivers and the monitoring and review process. It is therefore evident that an Operational Management Plan/Delivery and Servicing Management Plan is a sufficient way of monitoring the future use at the site.

35. Within TfL guidance, DSMPs are requested and required for most new development sites that generate servicing activity. It therefore acknowledged that this is a sound tool used across the planning system in London in which to manage deliveries and servicing at a site.

36. SEGRO will also obligate compliance with the commitments set out within the DSMP in the lease of the unit.

37. There are also other ways end users can monitor routes their vehicles are taking to and from sites through technology. For example, Teletrac Navman is a company, which provides software that can be used for GPS vehicle tracking as well as compliance with electronic driver logs (a digital device that connects to the engine of a vehicle allowing drivers to automatically track all driving activities throughout the day.)

Summary

38. On the basis of the above, the development proposals should not be resisted on transport or highways grounds, and it does not contradict paragraph 111 in the NPPF, which states:

“Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

Appendix A

Public Responses

No.	Name	Comment	Theme	Vectos Response
1	Mary Hill	The premises are located in an area which is completely unsuitable for commercial vehicles of up to 18 tonnes travelling 24 hrs/day past residential homes, three schools nurseries, young people's accommodation playgrounds, a GP surgery and services for elderly people. All of the surrounding streets are narrow, with many parked cars. Footfall is very high, with children walking to and from several schools, shoppers going to the High Street and students to their accommodation. As it is Camden's policy to work towards decreasing traffic in this borough, and improve air quality, agreeing to this planning application would contradict this. Although we all benefit from home delivery services, a distribution warehouse in the middle of a highly residential area is not appropriate and another site should be sought.	Traffic, Narrow street, suitability of site	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.

2	Clarissa Frais	I oppose to giving them permission to use Holmes Road. I have children who go to St. Patrick's Primary School in Holmes Road and it will be dangerous for all the students there if big vehicles will constantly pass by. That road is quite small and lots of children are using that road frequently. There will be negative impact for sure if this application will be passed. Also, it's very congested as it is even now, so what more if this will be used by huge vehicles such as coaches and delivery trucks 24/7.	School children, narrow street	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.
3	JP Bradshaw	Dear Sir/Madam, I'm writing to object to this application. I believe that 3-6 Spring Place is unsuitable for B8 use. The HGVs and delivery vehicles listed in the application will try to travel along streets which are already congested - Holmes Road in particular. The diesel delivery vehicles will travel past schools and nurseries and parents waiting to pick up their children, and through Queens Crescent Market via the already narrow Grafton Road. There's an industrial estate a few hundred yards away, which is a far more suitable site for this kind of business. I urge you not to blight and endanger this residential area of small streets and families with this invasion of lorries and trucks.	School children, narrow street, congestion	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615. The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. In addition, the Kentish Town Planning Framework supports that roads including Spring Place and Holmes Road are suitable for low HGV

				generating Industrial Uses, which this development is (i.e. max of 9 HGVs a day). These vehicles will be limited to 18t in size.
4	Pamela Taylor	The surrounding streets are completely unsuitable for such a centre, with very narrow mainly residential roads. Incoming goods at least would be delivered on large lorries. The Holmes Road/Kentish Town Road junction regularly causes jams on both roads as ordinary cars try to get past each other. Queen's Crescent has a street market. The amount of traffic would surely greatly exceed Addison Lee's, which was light. All the surrounding roads are not only narrow but primarily residential, most of the houses have little or no front garden, and there are several schools. So noise disturbance and pollution are also major concerns. If the firm wants to be in this area then surely it has to be in Regis Road.	Narrow street, congestion, pollution, noise	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615. The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. In addition, the Kentish Town Planning Framework supports that roads including Spring Place and Holmes Road are suitable for low HGV generating Industrial Uses, which this development is (i.e. max of 9 HGVs a day). These vehicles will be limited to 18t in size.

5	Coral Turner	Ryland road is already disrupted by traffic as cars use this road to turn right to get onto Wales road due to the one way. Adding extra traffic would cause more disruption and distress to residents. Other reasons for my objection against this project include; — Increased traffic — increased noise — HGV lorries passing through our small street — safety of our children — Disruption of play streets and other community activities — Residential area	Congestion, noise, narrow street, school children	Ryland Road will not be a primary route for development traffic and is expected to be used. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.

6	Larushka Ivan-Zadeh	I object strongly to this proposed change of use. This is already is an area of much traffic. There are several schools nearby and it has recently been all over the news that pollution is a direct fatal threat to children. There are two schools on Holmes Road and a nursery at the junction of Queens Crescent and Gillies Street, plus Carlton primary nearby.	Congestion, pollution, school children	Increases in traffic on surrounding roads would not be significant and well within daily fluctuations roads such as these typically experience. The analysis shown in the TS shows that vehicles are not expected to travel at peak school times. In addition, the level of traffic generated by the proposals is not significant. In addition, Servicing vehicles (7.5t -18t) will be prohibited to use Holmes Road between the hours 0800-0945 and 1515-1615.
7	Dilip Lakhani	I would like to emphasise just how unsuitable this site is for B8 (storage and distribution) use, with planned routes for HGVs and other delivery vehicles going past schools, nurseries, major pedestrian routes for childre and older people, right through Queens Crescent Market and along the already heavily congested Holmes Road. The routes would also take in Grafton Road and vehicles are likely to find their way through other local streets when there is congestion. We know that everyone relies more and more on deliveries, but given that we have an industrial estate on Regis road with empty properties already available and waiting for suitable tenants and employment opportunities today and now for warehousing less than half a mile away it is hard to justify this plan. I live on Alma Street and we often have cars travelling much faster than 30mph zipping down us to escape through. There has been deaths in the past. In addition: that area has become an oasis more recently with Inkerman Gardens and its seating, a great restaurant, a pub, new council offices. Introducing B8 usage is entirely inappropriate for this current mix in the area. It requires more workshop / offices and a different kind of commercial possibility to make it more vibrant and keep it's developing character. I would also like to complain that that Grafton Road is part of a Cycling Quiet Way between Camden Town and Highgate also connecting to Hampstead Heath (Constantine Road) and it is planned to upgrade this route to be part of cycleway C6. Holmes Road is the only east-west route in the area and is already plagued with motor traffic, deterring cyclist and pedestrians who are nevertheless forced to use it. It is also very narrow in places and totally unsuitable a an access route.	Congestion, school children, cycleway	Increases in traffic on surrounding roads would not be significant and well within daily fluctuations roads such as these typically experience. The analysis shown in the TS shows that vehicles are not expected to travel at peak school times. In addition, the level of traffic generated by the proposals is not significant. In addition, Servicing vehicles (7.5t -18t) will be prohibited to use Holmes Road between the hours 0800-0945 and 1515-1615. Queens Crescent is not to be used by development traffic.

8	Maryam Suleiman	Any increase in lorry and van traffic on already overloaded streets (Holmes Road in particular) is unacceptable. There is also a dangerous corner at the junction of Gillies Street and Queens Crescent, whic is a main part of the route. The developer argues that there would be less traffic than was generated by Addison Lee (there are reasons to doubt the facts behind this and they were mainly just taxis). However the world has moved on and there are far greater concerns about pollution and road safety for cyclists and pedestrians. Holmes Road is already noisy as it is with construction work on a daily basis, not to mention the heavy traffi on the road. We do not think having extra traffic on the road will be in the best interest of the people living i this area and on the road. Many people now work from home, and this is likely to continue and has implications for the noise likely to generated by the proposal. The proposal is for the site to be open 24 hours a day, 7 days a week, with the restriction being no external unloading between midnight and 5 am. It is not clear whether this is even allow ¿ the Control of Pollution Act 1974 enables local councils ¿to request sites use best practice and where necessary keep noisy works within certain hours. Normally the hours for noisy works are 8am to 6pm Monc to Friday, 8am to 1pm Saturday and no noisy works on Sundays and Bank Holidays.¿ Segro¿s plans for 2 operations might well contravene these restrictions.	Congestion, road safety, pollution, noise, dangerous corner	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Increases in traffic on surrounding roads would not be significant and well within daily fluctuations roads such as these typically experience. The analysis shown in the TS shows that vehicles are not expected to travel at peak school times. In addition, the level of traffic generated by the proposals is not significant. In addition, Servicing vehicles (7.5t -18t) will be prohibited to use Holmes Road between the hours 0800-0945 and 1515-1615.
9	Jonathan Bradley	I would like to raise a number of concerns. Spring Place is right on the edge of a conservation area surrounded by 3 schools on Grafton Road, Holmes Road and Willes Road. The type of vehicles that will be used will increase the risk to students and residents, pedestrians and cyclists. This is not acceptable. The location gives no immediate access to major traffic flows and forces drivers to use what should be quiet residential roads. Holmes Road already is over-congested due to poor planning of the Stay Club and its adjoining student and tourist quarters, along with a road that is already too narrow for wide vehicles. There is no justification for this when there is a corresponding site in Regis Road tailored for this type of activity. This plan should not proceed.	School children, road safety, congestion, narrow street, conservation area	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site.

10	Joseph Candelario-Mckeown	I don't agree with the commercial change of use. This will increase transport routes of heavy commercial vehicles. This will devaluate our properties and more so depreciate the market value of our properties. Hea commercial vehicles will damage the already fragile roads around the area. The current depot has already caused the banks to refuse mortgage applications in our area which is a cause of concern for the residents our building. This is our ongoing concern and this application will negatively affect the surrounding neighbourhood by way that this will affect pedestrians, cyclist and can potentially increase danger for peopl	Road quality, road safety, real estate	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.
11	Georgia Platt	As a resident of Willes road, I strongly disagree with the above proposal for the area to host a holding unit for HGVs. It is a residential area with schools and other foot traffic. There are huge industrial sites all across London, including Regis road, not far from here at all. That this development has even been proposed is an infringement to our residential rights. How are the young families and all residents to deal with the onslaught of HGV traffic at all hours? And when schools end and [redacted] how can you guarantee that there wont be casualties? I oppose to this development on the grounds of traffic, pollution, noise pollution and the general safety of what is a conservation area. Shame on you Camden council for even hosting a capitalist giant who has no interest in the area except for monetary gain! Absolutely disgusting.	School children, congestion, noise, pollution, road safety	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.

12	Hilary Barnes	I etrongly object to thie propoeal, for the following reaeone: Access and road layout Spring Place is located in a small road, at the centre of a network of similarly small, curving roads, probably tracing the route of the Fleet River. Many of these streets are residential. Access to this location from all directions is not only hazardous but unsuitable. The main points of access proposed are Grafton Road, which is extremely narrow and itself hard to access, and Queens Crescent, which has a much needed, well used street market. I wonder if the designers have actually visited the area, in the daytime, and taken note of any of these points? Many vehicles, discovering the restrictions, attempt to use neighbouring, equally inaccessible streets. I have witnessed many large vehicles laboriously trying and failing to negotiate the area, most recently a No. 46 bus and an articulated car transporter, both resigned to backing out. A very dangerous spectacle. Local community and schools A living wall cannot hide the fact that this is a distribution centre. There are two schools close to Spring Place. Environmental, safety, pollution hazards are high on the agenda for the London Borough of Camden and fully supported by the local, extremely active community. The siting of this centre, in this area contradicts and conflicts with the policies of Camden, put together through proper, thorough, time consuming consultation with all members of the community, both local and Borough wide. Noise pollution The proposed hours of opening, 24 hours, 7 days a week, with \external loading between 12 and 5am\ cannot be serious and are questionable. Is this legal? Empty promises As a long-term resident of this area, I have witnessed many occasions where the developer has made promises which have not subsequently been adhered to. \Monitoring and surveying\ are weak and ineffectual, irrelevant unless enforceable by law. Questionable motive I do question why Segro, an international company, has chosen an inner city, residential area to site a warehouse? I canit expand on this as I have no answers. For all the points I have raised, I hope that this proposal will be considered carefully and rejected.	Narrow street, school children, pollution, noise	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. In addition, the Kentish Town Planning Framework supports that roads including Spring Place and Holmes Road are suitable for low HGV generating Industrial Uses, which this development is (i.e. max of 9 HGVs a day). These vehicles will be limited to 18t in size. Enforcement through planning conditions will be attached to the site and any future occupier. In addition to monitoring surveys, there are ways in which companies can track their drivers through technology (Teletrac Navman). Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.

13	Peter Callow and Sophie Hedworth	We are concerned about the above change of use for the following reasons: The site for a proposed delivery depot is opposite the existing, already busy Veolia depot, with many pedestrian street sweepers with their carts coming and going as well as larger street cleaning vehicles, who rely on efficient access to do their daily work. Road access to Spring Place is limited by the scale of narrow Victorian roads, often with parking spaces eit side. Manoeuvrability to the location is restricted by sharp turns from Holmes Road, Grafton Road and Gillie Street onto Queens Crescent where access is already controlled to enable the street market to operate on Thursdays and Saturdays. A railway line bisects the site which would surely be problematic for the larger delivery vehicles proposed. Planners will know there is a large school in Holmes Road, very near the proposed location for the depot, a well as many residential homes Therefore we suggest in the light of Camden's promotion of the benefits of walking and cycling, there would a contradiction in allowing a 24/7 distribution hub in this location which will add considerably to poorer air quality and issues of safety.	Narrow street, school children, pollution	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.

14	G.R Hawting	The proposed route for HGVs to access the site is completely unsuitable. As a resident of Holmes Road, I a especially concerned with the proposal to use it for "smaller" HGVs. Holmes Rd. is relatively narrow and contains a mixture of residential houses and flats, a busy police station, two schools, and a council depot. It already overused and, in my opinion, sometimes dangerous with regard to the amount of traffic using it and the fumes generated. The section between Raglan St. and Kentish Town Road consists on one side of a terrace of houses and flats where vehicles are often parked for short periods (whether to service the houses or for drivers to avail themselves of the shops on KT Rd.) and at busy times it sometimes becomes complet jammed, with other vehicles trying to go in both directions, and drivers displaying aggression. Much of the same could be said about the other proposed routes - the residents of Spring Place will find it a nightmare if approved. The situation of the building makes it completely unsuitable for the proposed use.	Narrow street, congestion, pollution	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site.
15	Michele Leys	I live in Willes road opposite the French School, I would be very concerned at the slightest increase in traff any description that might use Willes road. There is already a huge amount of traffic on this road all day. There are parents picking up and dropping c children at different times, many of them hoot and argue and clog the road up while they try and park, ther they keep their engines running while they wait. There are crocodiles of little children going back and forth There are large older children flocking the pavements and spilling dangerously over into the roadway, plus scooters, bikes and footballs. There are massive food delivery lorries to their kitchen every day. There are coaches and school buses delivering and fetching children several times a day. Then there are Veolia vehicles which seem to see Willes road as a short cut and are up and down all day. Plus workmen scaffolding going up and down, there is always some home improvement or maintenance going on. ANY addition to all this noise and pollution would make it all even more unbearable.	Congestion, school children, noise, pollution	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site.

16	Kinga Bloch and Marcel Neumann	We strongly object to this project as it would increase the traffic a pollution in a residential area to an unbearable level. The traffic on Grafton Road is already very busy without the new project and the noise pollution is quite high during the day. We are worried that it will get even worse with small lorries and deliver vans passing the area with an even higher frequency. This project would also be counterproductive to Camden Council's campaign toencouraging cycling via new cycling lanes. We feel that the increase in the presence motored vehicles in the wake of project 2020/5913/f would endanger us as a family who is following the Council's advice to use bicycles rather than a car to redu pollution. Why are we asked to change our ways when the Council decides to increase traffic in our area at same time? How is a new distribution centre in a residential area supposed to make cycling safe for a family with a child? Last, but certainly not least, there are several nurseries, primary and secondary schools in immediate vicinit of the site. Therefore, we cannot help but wonder how this project is supposed to align with the Mayor's plan to improve air quality around schools and nurseries (e.g. https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/mayors-school-air-quality-audit ogramme). Please note that we will enquire about the issues related to the planning application with Mayor Sadiq Khan directly as well.	Congestion, noise, road safety, school children, Mayor's plan	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site.
17	David Taylor	The proposed location for this development is entirely unsuitable. The surrounding roads are crowded residential streets laid out in the 19th century and not designed for large numbers of delivery vans and larger vehicles. The roads are full of parked cars and the larger vehicles that would be going to use this site will often have difficulty navigating the roads, with all the risks that would entail for children and other pedestrians. Some of the traffic generated by the site would then need to use Prince of Wales Road, which is already frequently congested because of the recent installation of cycle lanes. There would also be increased pressure on Kentish Road for the same reason. The existing junction at Holmes Road and Kentish Town Road is already heavily loaded and unsuited for larger vans and HGVs. There are other areas in Kentish Town that are not located in primarily residential areas and would be much better suited for a delivery depot. In particular, the Council's Framework Plan for the area identifies Murphy's Yard and Regis Road as areas for industrial development. The application relies heavily on claims about past usage of the site and the associated traffic. However, these are assertions that are not fully supported by evidence and in any case are not appropriate for an environmentally friendly future. The application stresses that travel to the site by people who will be working there will not increase pressure on the roads, but this is of minor significance when one considers that the whole purpose of the application is to generate local delivery traffic.	Narrow street, congestion,	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of

				vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.
18	Daniel Solomons	I must object to this application. The roads and access are simply not suitable for this type and weight of traffic. If anything, this area and the conservation area immediately next to it require traffic calming measures. A creation of a last stop depot, opposite a school, on the edge of a narrow one way system will cause many problems, including: increased air pollution, increased road wear out, massive increase of large vehicles using the narrow Holmes Road entrance to the High Street (with resulting chaos and jams), overuse of Grafton Road (which is already blocked to traffic at certain times), risk to school children's health and safety, more smaller vehicles using the Inkerman Road conservation area ad a rat run, also with increased pollution and damage to parked cars and road surfaces. All in all this is a very unsuitable location for this proposed use I oppose it strongly and advise looking for more suitable premises for this (e.g the industrial estate on Regis Road	Narrow street, congestion, school children, pollution	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.

19	Simon	I wish to object. This will cause too much traffic through local narrow streets at all hours causing problems w pollution for so many residents and children in schools near by.	Narrow street, pollution, school children	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site.
20	Alistair Stephens	Dear planners, Itís a tricky one as these satellite hubs are needed, on paper it looks like less traffic than the previous own Addison Lee (although an increase in LGVs +28) and they are building something quite advanced in terms carbon cutting buildings go. But this was in the past and times have changed dramatically since along with Regis Road being a better suited site. I would object, the roads are simply too narrow, busy and the school/health issue must throw it out. I would also question things or ask them to change them to review again; • Is this outside loading bay for HGVís enclosed to stop noise to residents? Assuming itís just for the HGVs and all others will be inside the space. • How much of the fleet is electric, cargo bikes, etc? • Will they be adding cycling infrastructure into Grafton Road, Queens Crescent and all other service roads protect cyclists? These roads are tiny with cars on! • One of their routes is being pedestrianised so I thought (ETO on Queens Crescent to pedestrianise it) so use that as a their ímajor westward accessî is going to be a bit tricky although I donít know how long the E would last hopefully forever. • Queens Crescent cannot take any more traffic, itís a nightmare to cross as it is. • I also thought Queens Crescent is going under some transformation as Camden Council have said 'build outs in road to slow down traffic and provide space for tree pits') – this is not an ideal HGC or LGV route. • Where is this living wall and size of it in metre squared? Their renders show it inside the building. Why no living roof as well? • Why is this located here when Regis Road is a stones throw away and has the infrastructure in place alre to cope with this? Alongside avoiding school routes. • For me as a cyclist or pedestrian, HGVs and LGVs are an equal threat as LGVs (vans) as they are small tend to travel at higher speeds and less of a vehicle to see coming. • Any business bringing more traffic to the area (3.8 movements per hour with 34 delivery vans permanent based on site – whoís controlling this umber? What if their business booms?) is a bad idea when there are better connected sites.	Narrow street, cycling, congestion, road safety	The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. Queens Crescent will not be used as a route to/from the site. All vehicles will service on site which is a betterment to the existing situation. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615. Enforcement through planning conditions will be attached to the site and any future occupier.

				In addition to monitoring surveys, there are ways in which companies can track their drivers through technology (Teletrac Navman).
21	Amadeus	There is general agreement that while we welcome commercial development on the site, B8 use is not suitable for a number of reasons, below. We acknowledge that last mile deliveries are needed, but a much more suitable site would be a location such as the Regis Road industrial estate. 1. Traffic: The routes proposed for HGVs coming in and smaller delivery vehicles going out is shown on the application and is mainly Grafton Road and Holmes Road plus (incredibly, given the market) Queens Crescent. You can see the map as an appendix to the Transport Statement – click on the View Application above, then click on the Documents link near the top). Any increase in lorry and van traffic on already overloaded streets (Holmes Road in particular) is unacceptable. There is also a dangerous corner at the junction of Gillies Street and Queens Crescent, whic is a main part of the route. The developer argues that there would be less traffic than was generated by Addison Lee (there are reasons to doubt the facts behind this and they were mainly just taxis). However the world has moved on and there are far greater concerns about pollution and road safety for cyclists and pedestrians (as evidenced by the extensive work Camden is carrying out on various routes around here an their commitment to Healthy Streets). 2. Noise Many people now work from home, and this is likely to continue and has implications for the noise likely to be generated by the proposal. The proposal is for the site to be open 24 hours a day, 7 days a wee with the only restriction being no external unloading between midnight and 5 am. It is not clear whether this even allowed – the Control of Pollution Act 1974 enables local councils 'to request sites use best practice a where necessary keep noisy works within certain hours. Normally the hours for noisy works are 8am to 6pm Monday to Friday, 8am to 1pm Saturday and no noisy works on Sundays and Bank Holidays.' Segro's plan for 24/7 operations might well contravene these restrictions. 3. Health and safety: Camden's ideas for Healthy Streets near schools are in direct conflict with the proposa The scheme for a depot poses a direct threat to the health and safely of children. Gov.uk says: 'Planning policies and proposals may need to have particular regard to the following issues: [redacted]such as schools, community centres an playgrounds' As well as the two schools on Holmes Road, CFBL ('The French School') and St Patricks, there is also a nursery at the junction of Queens Crescent and Gillies Street and, at the moment, Carlton. The concession avoid standard arrival and pick-up times at the schools completely ignores the reality of the existing stagger start times and nursery times. In addition, every summer StayClub in Holmes Road hosts young language students who move around in v large groups (up to 100 people) at various times of the day. CFBL students also go out at various times of t day, again in big groups, to attend sport in The Dome (Queens Crescent) and Hampstead Heath. In normal times, all local schoolchildren use the proposed routes for access to Kentish Town Sports Centre throughou and after the school day.	Congestion, noise, school children	Queens Crescent will not be used. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.

22	Stella Cheetham	After being made aware of the planning proposal for spring place I would like to make my view known. I disagree with this proposal Immensely as I am a resident on the corner of Willes road and spring place. The noise this depot would make through the night will be disturbing and inconsiderate to residents. To ha large lorries travelling up and down the roads throughout antisocial hours would be disruptive and inconsiderate to residents. The potential traffic also caused by the depot again would be disruptive and dangerous for the area. There many elderly residents and young children within the area travelling to school, appointments etc that to hav 18tonne lorries on the roads is just unsafe and not cooperating with Camden¿s policy to prioritise pedestri safety. Industrial areas like Regis road are beneficial to residents and the public as that is an isolated area away t doesn¿t disturb or Endanger residents or the public As a 71 year old this depot would make me feel unsafe in my local area. Willes Road and Spring Place are quiet and safe streets therefore adding drivers/depot workers hanging round the streets 24 hours a day, 7 days a week would make me feel very uneasy to leave my home if needed. [redacted] [redacted] with the possibility of 18tonne lorries contesting the roads how would this be possible. Please refrain from progressing with this application	Noise, school children, road safety	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.
23	Ellen Farquharson	Narrow streets, two schools, above all bang in the middle of a residential area.... Are they mad, or just very, very arrogant?	Narrow street, school children	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. Development traffic would occur predominately outside of peak school times. Servicing Vehicles

				are restricted from using Holmes Road between 0800-0945 and 1515-1615.
24	Gary Lane	It is hard to conceive why there is an application for a distribution depot in the middle of a residential area Lorries and vans trundling along residential streets at all times of the day and night cannot make sense. I particularity inappropriate given the site's proximity to two schools one or other or both of which lorries an vans must pass close to in order to access the site. That is, unless there is a proposal to use the access Gillies street which requires passing close to the community centre via an incredibly tight and awkward co for traffic. The applicant's comparison of traffic patterns between vans/lorrries and private hire passenger vehicles is disingenuous at best and intentionally misleading. Concomitant with the traffic is the noise generated by an operation running 24/7, again in a residential are The whole point of the application is for a 24/7 operation and I fear that any proposals to limit the hours of operation will be either ignored or subjected to piecemeal planning applications at a later date. The residential streets between Grafton Road and Kentish Town Road are not appropriate for B8 usage a object strongly to this application. I have no objections to the proposed refurbishment of the building itself but the change of use would seem fly in the face of Camden's preservation of the residential nature of the Inkerman Area Conservation Area	School children, trip gen, noise	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.
25	Amelie Perrier	HI, I am very concerned about this project, the plan does not seem to take into account the direct threat to the health a [redacted]. The road in front of Saint patrick is very small and already very dangerous and always very packed and jammed, I am surprised we would want to increase th traffic there and not reduce it for the safety but also health of the children going to this school. Such a proje should be done in a place that access through a main road not through very small roads going past two schools. Thanks	Narrow road, school children	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live

				tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads.
26	Arun Menon	The proposed project is inappropriate on a number of important public health grounds. These include increased pollution causing harm to health (recently implicated in the death of a child in Lewisham), increased heavy goods traffic likely to increase risk of serious injury in a residential area with several schools, increased traffic volumes on narrow streets which are already double parked, and increase noise pollution in an otherwise quiet residential area. These projects are important for the logistics of London, but should be better thought through and more appropriately located. This project is not the right solution.	Pollution, road safety, narrow street, noise	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads.
27	Adila Chabri	We object to this application. The proposed development will provoke a dramatic increase in vehicle air pollution not just for residents, but most importantly for the many young pupils who attend schools in the immediate proximity of the site. The additional air pollution from fuel will not only be as a consequence of the direct increase in vehicles in the area. In fact the unavoidable increase in traffic congestion will force the existing transiting vehicles to also spend more time in the area. Vehicle air pollution comes from fuel, brakes and tires - even the adoption of electric-only vehicles would not negate the very serious air pollution from brakes and tires. Many studies have demonstrated a proportionate link	Pollution, school children, congestion, road safety	The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower

		between increasing levels of air pollution and children's cases of asthma, reduced lung capacity, reduced immunity and reduced learning abilities. Additionally air pollution is linked to overall mortality in the general population with an estimated 5,000-10,000 early deaths/year in the London area. The proposed development will also increase the risk of accidents involving the additional vehicles and the young pedestrians who reach the nearby schools on foot, scooter, pram etc. This development should not be allowed in such a heavily residential and educational neighbourhood.		than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.
28	Marie Hamon-Smith	My daughter attend CFBL SCHOOL - I am worried for her health & safety - due to traffic increased with the van - potential accident during entrance/exit of school - higher level of pollution - gridlock in such small road already very busy at school rush hour. Thank you for considering carefully this option.	School children, pollution, congestion, road safety	Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower

				than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.
29	Raya Ghattas	I object to this project. I have 3 children at school on Holmes Place/Willes Rd. The streets around the school are often congested with narrow 2 way streets that cause standstill traffic. Any additional traffic to a storage site of cars and larger load vehicles will not only cause further congestion, but will be highly disruptive in terms of both air pollution and noise pollution around the school, and be a threat to the safety of students walking to and from school. The maps included in the project do not show the two primary schools and one nursery that are in the direct vicinity, and these should be represented for a true evaluation of the impact of such a project on its surroundings. I strongly object to this project.	Congestion, narrow roads, pollution, noise, school children	Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.

30	Laura Saltarelli	Dear Sirs and Madams, I'm writing you because I'm very surprised that this project is actually being discussed. To consider building a warehouse just next to a primary and secondary school which has more than 700 pupils is not respectful to our children safety. I already have written many times to the school to tell them that crossing the street near the CFBL school was dangerous because there are no beluga crossing nor clear signs in every street around that there is a school. But if you want to have a warehouse with lorries that clearly will put my children at risk. I thank you very much for taking my comments into consideration as well as the wellbeing of many kids who go to school alone.	School children, road safety	Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615. The development proposals will not result in a signifcant number of vehicles, (particularly with regard to larger servicing vehicles (7.5t and 18t)) on surrounding roads and would see a significant reduction when compared to the previous operation at the site. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.
31	Eberhardt Mike & Anabelle	We object to this application. We have our children at the French Bilingual school and every morning when school is in session, we witness painful traffic congestion on Holmes road, Grafton road, and Willes road. The creation of a hub within the residential area and with close proximity to two schools, will only exacerbate this and drive the levels of pollution up in an area already identified as suffering from some of the highest levels of pollution in London (refer to the Kentish town framework 2019). CFBL, a 700 student pre-school, primary and secondary school, is one of the schools in very close proximity to the Hub was already designated as being Sensitive Use within	Congestion, pollution, Kentish Town planning framework	Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615. The development proposals will not result in a signifcant number of vehicles on surrounding roads and would see a significant reduction when compared to the previous operation at the site.

		Camden KR planning 2019 for the purpose of movement and transportation planning. Introducing a hub and the associated traffic and related emissions would only serve to worsen the air quality of an area already recognised as facing high levels of pollution. The applicant justifies the implementation of a hub stating the area is mixed-use within the transport statement. yet the site and the routes are located within the residential neighbourhood. This is in contradiction with the 2019 Kentish Town framework. The whole purpose of the 2019 Kentish Town framework is to stitch the different use areas by purposefully isolating and have No vehicular connection between the residential neighbourhood and the Regis Road and Murphy's Yard industrial /commercial areas. As a result, previous access points such as Arctic street have been closed off resulting in no through routes across both Murphy's Yard and Regis road area, severing areas to the East and West. The only point of access to Regis road is Regis road. The location of Spring place for a vehicular hub is, therefore, a complete transgression and contradiction with the Kentish Town planning framework. As a parent with children attending the school directly opposite to this planned hub, we respectfully object to this planning application.		The Kentish Town Planning Framework supports that roads including Spring Place and Holmes Road are suitable for low HGV generating Industrial Uses, which this development is (i.e. max of 9 HGVs a day).
32	Anabelle Rodrigues	We have a property in Willes Road and have our children in CFBL, the French bilingual school.	Kentish town planning	The Kentish Town Planning Framework supports that roads including Spring Place and Holmes Road are suitable for low HGV generating

		1 - The location of Spring place for a vehicular hub is incomplete transgression and contradiction with the Kentish Town planning framework. It is outrageous that the applicant justifies the creation of a transport hub by stating in Section 2.13 of its transport statement (Transport Statement by Vectos for Segro 18/12/20) that “Given that the industrial nature of the area is noted within the framework, it is considered that the creation of industrial uses in this location is acceptable.” This is misleading and not correct. Spring place and the routes the Hub intend to use are located in the neighborhood section of the framework or clearly residential area with 2 schools, including the 700 pupils CFBL (French Bilingual School) in very close proximity. All of the roads surrounding Spring place are residential (and/or School). The Hub will have a dramatic effect on air quality specifically on the 2 schools which have already been identified as sensitive uses buildings, given the fact that this area has had some of the highest levels of air pollution in London due to the high vehicle usage and congestion (please refer to Kentish town framework July 19). We believe the applicant is mistaken and might be referring to the Regis Road and Murphy’s Yard which is mostly commercial, whose infrastructures are purposefully isolated from the neighbourhood. Those industrial/ Commercial areas already isolated from the neighborhood as a result of the rail infrastructure, have been further severed by Camden: Previous access points such as Arctic street have been closed off resulting in no through routes across both Murphy's Yard and Regis road area,	framework, pollution	Industrial Uses, which this development is (i.e. max of 9 HGVs a day). The site is an existing employment site and the development proposals will not result in a signifcant number of vehicles on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.

		severing areas to the East and West. Also, The only point of access to the Regis road area is Regis road ! Therefore none of these industrial /commercial areas is connected to Spring place or the neighborhood road. The location of Spring place for a vehicular hub is therefore in complete transgression and contradiction with the Kentish Town planning framework. This is not a simple change of use, it does have a dramatic impact on traffic within a residential / school area which is already problematic for both pedestrians and vehicles in normal times. Sticking to Planning strategy The applicant also states that the site has been granted permission for offices/ cafe but that it was not built because it was not economically attractive, and therefore an industrial use is acceptable. We believe that Camden planning strategy shall not be altered on the basis of temporary economic fluctuations but should follow the visions that the planners had established alongside the residents. In contradiction with Camden strategy and investment Also, it seems that the applicant is misinterpreting or misleading the reader(in 2.11 of transport statement - see below extract) into believing that the Kentish Town planning framework aims to prioritize and extend the industrial areas when actually the framework intends to redevelop these areas to manage traffic by isolating them from the neighbourhood. This implementation of a hub in Spring Place would spoil the framework efforts by creating new industrial/ Commercial activity traffic within the residential area Transport statement: 2.11 “It is noted that the site is in an area of changing character as identified through the Kentish Town Planning Framework (July 2020). Within the framework		

		area, there are two principle development areas that are expected to come forward for comprehensive redevelopment: the Regis Road Growth Area and Murphy's Yard.		
33	Djalila Boumezbeur	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	Noise, pollution, school children, road safety, fire hazard	The development proposals will not result in a signifcant number of vehicles on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615. The development proposals will not result in a signifcant number of vehicles on surrounding roads and would see a significant reduction when compared to the previous operation at the site. When compared against baseline traffic flows, increases are well within daily fluctuations. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower

		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 (7.5f)". 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		than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased. It has been demonstrated that surrounding roads are suitable to carry the type and number of vehicles proposed as a result of this development.

		(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 blank 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 as 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 of HGVs in		

		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. 54µgm3 with a range of 50-59, by contrast for the same date pollution in Willes Road (next to our school) was 37µgm3 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, buta 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.		

34	F. Haffner	It is really surprising have a storage and distribution business at this corner of Holmes road and Grafton road when this area is already very difficult to circulate in: two schools are and a police station are already on Holmes road making traffic at certain times of the day extremely busy. It is a two way road were cars can hardly cross. The access to Holmes road from Kentish Town road is blocked consistently because of motorbikes parked there, delivery vans circulating and cars trying to cross each others in a narrow road Adding traffic with additional lorries will make the road even more dangerous especially for the children of St Patrick¿s and CFBL who already hardly have any space on the pavement to circulate safely. I cannot imagine how this area can cope with such a project without seeing all the obvious detrimental effects. This area was already a cause of concern for the families circulating there daily, whether walking, cycling or by car, this is consistently difficult and unsafe. This project would only worsen the situation.	Congestion, school children	The development proposals will not result in a signifcant number of vehicles on surrounding roads and would see a significant reduction when compared to the previous operation at the site. When compared against baseline traffic flows, increases are well within daily fluctuations.
35	Dorothe Dembiermont	The scheme for a depot poses a direct threat to the health and safety of children. As well as the two schools on Holmes Road, CFBL (¿The French School¿) and St Patricks, there is also a nursery at the junction of Queens Crescent and Gillies Street and, at the moment, Carlton. The concession to avoid standard arrival and pick-up times at the schools completely ignores the reality of the existing staggered start times and nursery times. The schools welcomes children as young as 3 years old and the majority of them are sued to walk as well as their scooters to come to the school. We have many road	School children, pollution	Queens Crescent and Gillies Street will not be used by servicing vehicles and development traffic associated with the proposals will occur outside of peak school times. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower

		accidents involving pedestrian and heavy goods vehicles. Having this trucs circulating around the schools is putting directly the children¿s life in danger. In addition, every summer StayClub in Holmes Road hosts young language students who move around in very large groups (up to 100 people) at various times of the day. CFBL students also go out at various times of the day, again in big groups, to attend sport in The Dome (Queens Crescent) and Hampstead Heath. In normal times, all local schoolchildren use the proposed routes for access to Kentish Town Sports Centre throughout and after the school day. There is also a great concern about the increase of the pollution which again would threaten the life of the local residents as well as children from the school. We are struggling to understand why Camden would allow this planning to go through when we know that Camden¿s policy is to reduce traffic road and pollution. Finally, the noise. Many people now work from home, and this is likely to continue and has implications for the noise likely to be generated by the proposal. The proposal is for the site to be open 24 hours a day, 7 days a week, with the only restriction being no external unloading between midnight and 5 am		than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.
36	David Abecassis	I am writing as a parent of children in schools impacted by the proposed development, and a daily pedestrian and cycling user of Grafton Road, Holmes Road and Spring Place. I object strongly to this application, on grounds of air pollution, risks linked to increased vehicle traffic in residential and school areas without suitable increase in road capacity and protection, and improper health impact assessments. The proposed development will provoke a	Pollution, road safety	The development proposals will not result in a signifcant number of vehicles on surrounding roads and would see a significant reduction when compared to the previous operation at the site.

		dramatic increase in vehicle air pollution not just for residents, but most importantly for the many young pupils who attend schools in the immediate proximity of the site. The additional air pollution from fuel will not only be as a consequence of the direct increase in vehicles in the area. In fact the unavoidable increase in traffic congestion will force the existing transiting vehicles to also spend more time in the area. Vehicle air pollution comes from fuel, brakes and tires - even the adoption of electric-only vehicles would not negate the very serious air pollution from brakes and tires. Many studies have demonstrated a proportionate link between increasing levels of air pollution and children's cases of asthma, reduced lung capacity, reduced immunity and reduced learning abilities. Additionally air pollution is linked to overall mortality in the general population with an estimated 5,000-10,000 early deaths/year in the London area. The proposed development will also increase the risk of accidents involving the additional vehicles and the young pedestrians who reach the nearby schools on foot, scooter, pram etc. In addition, the health impact assessment attached to the application fails to recognise the two schools that are directly adjacent to the site and /or the proposed HGV (Carlton Primary School and CFBL). HGV traffic on Grafton Road (where Carlton is located and which is already a very congested access road), Spring Place and Holmes Place (where CFBL is located, and where there is already barely enough space on the road to accommodate normal vehicles) will worsen traffic, air and noise pollution, and the safety situation for schools. There is no mention in the application of the impact of sub-7.5t HGV during school peak times for		When compared against baseline traffic flows, increases are well within daily fluctuations.

		example. There does not appear to be any commitment to ensure all vehicles using the site during the day are fully electric, nor that HGVs will only use the site outside of school hours. I note there is already a Camden Council platform right opposite CFBL on Holmes Road. The impact of the proposed development on this platform is not clear. In summary, it is my view that this development should not be allowed in such a heavily residential and educational neighbourhood, on roads that are barely sufficient to accommodate light residential car and cycling traffic.		
37	Andrew Eland	As a parent of children who attend the CFBL school, I am seriously concerned about the risk of injury to children that will be an inevitable consequence of increasing the number of goods vehicles using Holmes Road. Likewise, the public health implications of the associated deterioration of air quality cannot be ignored. I appreciate the need to introduce infrastructure for last mile deliveries, but it cannot compromise Camden's current transport strategy, centred around healthy streets, travel and lives. Given the significant amount of pedestrian traffic along Holmes Road at all hours, driven by both the schools and high-density student accommodation, I would welcome a broader approach that mitigated excess traffic around the schools by closing them to vehicular traffic, rebalancing public space away from motor vehicles towards the current majority users of the space - pedestrians. As it currently stands, this application could not be further from Camden's stated policy objectives.	School children, pollution,	The development proposals will not result in a signifcant number of vehicles on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615. It is acknowledged that there is a requirement for healthy streets proposals to promote walking and cycling, but it is also important to note that there is still a need to safeguard vehicular access on roads for industrial and commercial uses so that key services can be undertaken. As such, it is important to maintain existing vehicle access on surrounding roads to the site, particularly given it is an existing employment site.

38	Roxane Fricou	Dear Camden Council, I am hereby sending this note to object to this planning application submitted earlier this month for the Spring place project. This project, if approved by the council, would be hugely detrimental to all residents of the area, all schoolchildren attending schools on Holmes road, and also, detrimental to the Kentish town area that would be crossed by these lorries. With my family, we live in Holmes road, and this project would have a huge effect on our wellbeing, health and mental health for the below reasons: - Noise: all our windows overlook the street and we hear all the cars passing by, day and night. Sometimes being woken up by loud noises on the street. A 24h lorry traffic in Holmes road would have dramatic impact on resident's sleep and therefore health and mental health. - Pollution: the argument of only using electric vehicles is not valid, once build, any vehicle could be used depending on requirements. This would have an outstanding impact on the air pollution. - Increased traffic: traffic is already bad in Holmes Road, this would overload the street at peak hour, with even larger vehicles. Pollution created by such project would have a huge impact for residents. - 3 schools would be directly affected, including CFBL, which is the school my children attend. The danger that lorries passing by creates is the worst point, Holmes road is a street full of children from 8am to 9am, 12pm to 1pm and 3pm to 4.30pm when school finishes. These children are mostly commuting by walk and lorries in the street would create hazard for them. - Cyclists (adults and children): I often take my children to cycle and we have to cycle through Holmes road since	Noise, pollution, congestion, school children, real estate	The development proposals will not result in a signifcant number of vehicles on surrounding roads and would see a significant reduction when compared to the previous operation at the site. Development traffic would occur predominately outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.

		this is where we live. Increased traffic of lorries would create danger for any cyclist including parents with children on seats. - Real Estate values: our properties prices would for sure be impacted by such change to the street. Please Camden Council, don't make this decision to approve this project, this would really be the end of Holmes Road.		
39	Sophie Tremolet	I am a local resident and parent of two children at CFBL school on Holmes Road. My children have been going to this school since 2011 and walk to school from our home in Tufnell Park. I used to take them by bicycle down Holmes Road or occasionally by car. The traffic on Holmes Road is very heavy already and any initiative that should be introduced should look to reduce traffic on Holmes Road and related streets, in line with the Healthy Streets programme of Camden Council and in alignment with the Paris Agreement, the 25 Year Environmental Plan and commitments with regards to a Covid-19 green recovery. This planning application is in clear contradiction with such commitments as it will increase traffic substantially in this area which is already extremely congested and polluted. I have not seen an air quality assessment of Holmes Road (where multiple schools are located) but clearly Kentish Town High street is already above the WHO recommended limits (https://opendata.camden.gov.uk/stories/s/bmrm-k7pv) - although the trend is downwards which is a good thing. Surely, Camden Council should not allow a development that risks putting all of these efforts for improving air quality and avoiding related risks in terms of morbidity	Congestion, pollution	The anticipated traffic as a result of the development will not be signifcant and will predominantly occur outside of school times. When compared against baseline traffic flows, increases are well within daily fluctuations. It is acknowledged that there is a requirement for healthy streets proposals to promote walking and cycling, but it is also important to note that there is still a need to safeguard vehicular access on roads for industrial and commercial uses so that key services can be undertaken. As such, it is important to maintain existing vehicle access on surrounding roads to the site, particularly given it is an existing employment site.

		and mortality at risk? In sum, I strongly oppose this development and will join the efforts of other local associations, the Parents association and the school to oppose this development as a group.		
40	Anstey Brock	I would like to object to this application if it leads to large numbers of delivery vans leaving/arriving at the depot around school run hours, that is 8-9am and 3-4pm. I believe that if there are large number of delivery vans zooming up and down this road during these hours then there could be an road accident involving a child. To explain further, I walk with my five year old to school every morning using the Spring Place/Holmes Rd/Willes Rd crossroad, along with many, many other families dropping their kids off/picking up from the two schools on Holmes Road. The school run hour is always very busy. There are many small children who cross the road on scooters. There are mums with buggies and several children to manage. There are 'crocodiles' of 20-30 school kids crossing. And there are groups of teens who walk home/to the bus stop together who pay no attention to their surroundings. Currently there is neither zebra crossing nor traffic lights to help pedestrians on the crossroad mentioned above. The spot next to the George IV pub is particularly dangerous due to the blind corner. The nearby crossroad connecting Holmes Rd, Athlone Rd and Grafton Rd is also already dangerous and further traffic will make it worse (again there's no crossing and no lights). Unfortunately I can easily see a situation where an exhausted and distracted delivery driver is hurrying to get back and finish his shift, and disaster strikes.	School children, road safety	The analysis shown in the TS shows that development traffic would predominately occur outside of peak school times. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.

41	Brigita Seguis	I am a parent with two young children at CFBL school and I would like to express my objection to the planning application 2020/5913/P. I take my children to school by foot and we walk past Spring Place, where the proposed warehouse and distribution centre would be situated. Having heavy good vehicles and numerous vans so close to the school would create a significant risk to the safety of all children who go to CFBL. I would also like to add that it's not just about drop-offs and pick-ups; children have sports classes outside the school and there are groups of children going in and out of school throughout the day, which in turn means that the risks will be there at all times. In addition to safety risks, there will be also be increased levels of noise and pollution, which will have a very negative impact on children's well-being. I strongly object to the proposed changes of use for the site on Spring Place for the reasons outlined above. It is a residential area with a school in close proximity and it is not suitable for the uses specified in the application.	School children, road safety, noise pollution	Development traffic will predominately occur outside of peak school times. Servicing Vehicles are restricted from using Holmes Road between 0800-0945 and 1515-1615.
42	Jee Eun Lee Fiorentino	As a parent of the school community, I strongly object to the proposal made in this application no. 2020/5913/P. This area is growing brilliantly as quiet residential and school districts providing many safe and kids family friendly facilities and events. Therefore, this area should be looked at more for residential leisurely purpose rather than allowing any uncertain industrial zones. many sites have been converted into affordable housing elderly care and some private homes for many. I would proposed that there will be more leisurely development and green space as this would be more of Kentish town as the congestion caused by the industrial activities is already a burden to	Congestion, narrow street	Queens Crescent will not be used as a route to/from the site. Development traffic will predominately occur outside of peak school times.

		the area. The road proposed for this use is already undermining the school access for pedestrians which involves small kids prams scooters and commuters on bikes. There is Queen's Crescent Market every Thursdays which closes this route which will overwhelm already difficulty. Holms Road has many school related properties and is a narrow road with parking spaces. It is already difficult with limited access to some roads. If the council go ahead with this plan, it is going against the green agenda and placing the a heavy commute risk for pedestrians of all ages. I therefore strongly object to the planning proposal presented here and not to allow this use to be changed or change to more residential related projects. We as a community of Kentish Town and Gospel Oak will definitely seek for banning any industrial sites to be allowed here. The Camden Service site across adjacent to the school is already congesting this area during commute times. It is therefore Council's responsibility to promote the residential and school district to be safe and green. This area has been going a great effort to endure many constructions projects to make more residential friendly projects and this will be going against all the efforts we have put up with the hope it would become more desirable and safe area. I experiences myself being hit by one of those oversize lorries for the site off Malden Road Leading into the construction site on Bassett St and nearly got badly injured during a school commute years ago. This has to stop from the council. This will increase daily threats to the commuters into this area and residence. The council		

		should really good look into a bigger picture of what this area is for the future.		
43	Caroline Dumanoir	I would like to object to this project without a proper impact assessement on schools nearby (additional traffic, safety concern, air quality)	School children, road safety, pollution	Development traffic will predominantly occur outside of school times. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased.
44	Kristin Wieroniey	As an individual residing on Queens Crescent (between Malden Road and Grafton Road) and a parent of children who attend CFBL, I would like to express my grave concerns about the planning application 2020/5913/P and object to it. Primarily among my concerns with the planning application relates to the existing road and building infrastructure already in place near the application site on Spring Place. As it stands now, Holmes Road, Willes Road, Grafton Road, Queens Crescent and Spring Place are not capable of handling High Grossing Vehicles, which will be delivering the products to the storage facility. For example, Queens Crescent is often a single lane and the trash/recycling collection trucks struggle to navigate the street. Spring Place is also single lane – full time- and I struggle to understand how an HGV could navigate the entrance/exit onto Spring Place. This is even before considering the train bridge that traverses	Narrow street, congestion, school children, road safety	Queens Crescent will not be used as a route to/from the site. The number of HGVs serving the site will be low and are likely to arrive/depart the site outside of peak times.

		Spring Place. I also call your attention to the proposal to close Queens Crescent to vehicle traffic (Queen's Crescent Motor Traffic Free Environment Trial), which would further impact the traffic near CFBL and St. Patricks Primary schools. Secondarily, a truck storage depot for the Veolia Corporation is already present on Holmes Road. Traffic is extremely busy as those trucks exit the depot, which is at the same time of school drop off each morning. This will only be increased with the added incoming/outgoing HGVs and delivery trucks traffic. The proposed warehouse and distribution centre at this site in Spring Place would create a significant risk to the safety of our children who go to the nearby school, CFBL in the immediate vicinity. We do not think that this risk can be sufficiently mitigated by the applicant. The proposed change of use for this site is therefore not acceptable. Other sites in more industrial areas, notably the existing industrial park on nearby Regis Rd, ought to be more appropriate than a site in close proximity to schools		
45	Nik Stanojevic	I am a parent with a child (soon to be 2 Children) attending CFBL on Holmes Rd which is only 50-100 metres from the proposed site. I strongly object on the following grounds: 1. Increased traffic congestion on Holmes Rd. This is already very bad and there is often stationary traffic for several hundred metres toward the junction with Kentish Town Rd. Because Holmes Rd is narrow and includes parked cars it can often take a large vehicle many minutes to go even a few meters. 2. Pollution. There are 2 schools on Holmes Rd (CFBL and St Patrick's) and adding a large number of extra HGVs	Congestion, pollution, noise, road safety, fire hazard	1. Development traffic would predominately occur outside of peak school times and as such will not effect the busiest times for the school, which is at pick-up/drop-off times. 2. The development proposals will result in a maximum of 9 HGVs a day, which is not considered significant. 3. The development proposals will not result in a signifcant number of vehicles on surrounding roads and would see a significant reduction when compared to the previous operation at the site. A review of

		sitting there idling their engines will increase pollution from already unacceptable levels. 3. Road safety. With the large volume of traffic, narrow pavements and large numbers of school children, as things stand today it seems like it is only a matter of time until there is a traffic accident on Holmes Rd. This is before considering thousands of extra HGVs. Many delivery drivers are professional, but it only takes one tired or careless driver in a hurry to kill a child. 4. Fire Safety. In addition, the proposed diesel / hydrogen tanks are very dangerous and such sites have seen fires and explosions in the past. 5. Vibrations. There are many old buildings on Holmes Rd (I think CFBL is grade II listed). Thousands of extra trips per year would be made by very large vehicles only 3-4m from these buildings. 6. Noise – will have an impact on the schools and residents. I would also like to complain about the timings and the way the plans have been communicated. First the timing of the consultation seems too short – a few weeks is not enough to solicit people's opinion. Second, because the school is closed during the latest lockdown many parents won't know about the plans (I live walking distance from the school and take my kids to school on foot but I am not a Camden resident and only heard about the plans from another parent). Parents need an opportunity to read notices posted on the street. I suggest posting clear notices outside all school entrances (CFBL has 4, St Patricks I don't know) and giving parents at least a month after the lockdown ends to respond (e.g. Apr 8 if kids go back to school on Mar 8). NB CFBL has primary and		accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased. 4. Points 4-6 are non transport related so are not responded to in this Note.

		secondary school kids – some parents only have kids in secondary school.		
46	Ray Huckle	Hello I live in gillies street ,the street that runs into spring place. I object to this application on the grounds of the environmental problems i can see that this will impact this small area i.e. the local traffic will rise significantly as this is a cut through from Malden road via queens crescent , gillies street , Grafton rd. and Holmes rd. and willies rd. and not forgetting spring place . None of these roads are suitable for large 18 tonne lorry's and even with smaller vehicles around the side streets awaiting loading /unloading it will not be environmentally friendly one little bit .The fact that there are at least 3 schools and a couple of nursery's in that area along with the residential inhabitants does not go well with Camden's views on the environment , we have the refuse yard (Veola) is directly opposite the proposed site and right next door is autograph sound who have a 40 ton articulated lorry from time to time and that is in addition to Camden's own repair yard (Holmes road at the junction of spring place)with their vans in and out and around all day. It has been mentioned about using Queens crescent as a route through to spring place but has the fact that there is a street market on Thursday's and Saturdays and the road is in fact closed on those days . The roads are narrow and widely used by cyclist, pedestrians and private cars . This project should never be allowed in a residential area and should be in an industrial area like Regis road . I would also like to point out that the flats next door to the	Narrow street, servicing, noise, pollution	Vehicles will not route through Queens Crescent or Gillies Street. It has been demonstrated that surrounding roads are suitable to carry the type and number of vehicles proposed as a result of this development. All loading will take place on-site. Vehicle movements will predominately occur outside of peak school times.

		proposed site would suffer noise and pollution as well . On these grounds i will be objecting to this application		
47	Mrs Savva-Brown	SCHOOL STRONGLY OBJECTS TO THIS PLANNING APPLICATION. We have the main school entrance on Holmes Road and have over 200 children and over 200 parents using this entrance. The pavements on this road are very narrow and already extremely dangerous. Having more trucks using this road increases the risk of our children and their families being hurt or killed. This road is congested with a huge amount of large trucks, cars, buses and police vehicles that already use this road all day long and it always get blocked up. The vehicles become stationary due to the parking bays and amount of traffic already using it. Pollution in this area is already high. Pollution will increase and damage the lungs of our children and families and staff. The school playground in on Holmes Road and is in use most of the day. The nursery playground in also on Holmes road and these very young children use this outside space all day. It is not fair nor healthy for our school community to be subjected to such dangers.	School children, road safety, congestion, pollution	The anticipated vehicle movements using Holmes Road is not significant and will be predominately outside of peak school times. When compared against the existing planning use of the site, the proposals represent a signifcant reduction is vehicle movements.
48	Robert Robinson	I wish to comment on one aspect of this application: the effect of traffic movements on the local area. In recent months Camden has implemented proposals which have had the effect of reducing motor traffic in Grafton Road, where I live. This has been facilitated by the pandemic. It has greatly improved the quality of life for me and other residents. My objection to this application is that it will increase vehicle movements along Grafton Road south of	Traffic movements, trip gen	1. Increases in traffic on surrounding roads would not be significant and well within daily fluctuations roads such as these typically experience. The analysis shown in the TS shows that vehicles are not expected to travel at peak school times. In addition, the level of traffic generated by the proposals is not significant. In addition, Servicing vehicles (7.5t -18t) will be prohibited to use Holmes

		Spring Place, as well as in other roads nearby. Please consider the following: 1. If travelling south from the location it is generally quicker to go down Grafton Road rather than east along Holmes Road and then south down Kentish Town Road. This is because of congestion on Holmes Road and Kentish Town Road. I therefore do not accept that the main route taken by vehicles will be along Holmes Road. As it happens, Holmes Road already has too much traffic, which is a particular concern because there is a primary school which fronts the road. Additionally, many children walk to school along Holmes Road - particularly between Raglan Street and Kentish Town Road - and the fumes from stationary/slow moving traffic are damaging these children's health. 2. I am sceptical about the figures for vehicle movements when Addison Lee had the site, because I didn't see that many Addison Lee cars travelling up and down the road. But even if those figures are assumed to be accurate, I would ask that the following be taken into account. First, Addison Lee operated the site in the daytime and only on weekdays. Their's was not a 24 hour operation. Second, it's not only that the proposed use would be predominantly for vans, rather than the cars which constituted the vast majority of vehicle movements when Addison Lee were there, it is how those vehicles are driven. As someone who walks and cycles, I am only too aware that many delivery vans are driven at excessive speed and with unnecessary acceleration and braking, thus creating more noise than the Addison Lee vehicles which in my experience are typically driven at relatively slow speeds by drivers who operate to high standards.		Road between the hours 0800-0945 and 1515-1615. 2. An independent third party survey company undertook the survey of the previous operation, and these surveys were accepted by LBC as park of the Brockton Capital Planning application. This has also since been checked with Addison Lee, who have confirmed the numbers are accurate. 3. Cargo bikes will be encouraged wherever possible. It is also noted that There is a commitment to 25% EV provision, which exceeds London Plan standards. As the market availability and technology improves it is the aspiration of SEGRO to increase the electrification of the fleet at the site.

		3. I note that one of the vehicles pictured in the application is a cargo bike. If this application is approved, I urge the council to impose a condition that a certain percentage, say 75%, of vehicle movements should be by zero emission vehicles, of which a percentage should be by bicycle/cargo bike. Surely that's the future, not even more noisy, polluting vans.		
49	Desmond Hirsch	Re 2020/5913/P 3-6 Spring Place, Kentish Town I object to this application. The Transport Strategy is fundamentally flawed. Queens Crescent is shown as a primary access route for HGVs as there are school use issues restricting the use of Holmes Road. Queens Crescent is totally closed to all vehicular traffic on Thursdays and Saturdays. It is heavily used by two-way traffic at other times and the Council is consulting on closure between Basset Street and Weedington Road (apart from limited Queens Crescent deliveries) as well as introducing restrictions at the very tight junction of Queens Crescent with Grafton Road such that access would only be possible from the south which is restricted near its junction with . See: https://consultations.wearecamden.org/supporting-communities/queens-crescent-traffic-free-environment/con sultation/intro/ Re-routed vehicles would need to travel south on Malden Road into Prince of Wales Road and then north into Grafton Road (where the swimming baths are on Grafton Road which are used by cyclists, the children and the elderly amongst others). The turning from Prince of Wales Road into Grafton Road is tighter than 90 degrees so unsuitable for large HGVs approaching from the west and, as noted above, the	Traffic movements	Queens Crescent and Gillies Street will not be used as routes for the development traffic. Increases in traffic on surrounding roads would not be significant and well within daily fluctuations roads such as these typically experience.

		turning from Grafton Road into Queens Crescent travelling east is also tight. All the above roads are primarily and increasingly residential. Primarily residential use of the site has already been approved subject to s.106 Agreement (2016/5181/P). That scheme may no longer be viable but it demonstrated the potential ways in which the site¿s constrains might be overcome. Regis Road where there are empty units is the obvious location for the proposed B8 Use.		
50	David Prince	This is not an industrial area, it is a residential area with schools that happens to have a Veolia depot located nearby, that is not a reason to presume that the sought after much increased level of LGV and HGV movements, 24 hours a day, should be considered acceptable Neither Grafton Road nor Holmes Road - the proposed primary access routes -are suitable for HGVs, including the "medium sized" HGVs envisioned in the proposal. HGVs attempting to use these routes already have real difficulties negotiating the tight turns into Spring Place, and from Kentish Town Road into Holmes Road. Camden should be looking to alleviate rather than exacerbate these existing problems Please refuse this application and encourage a better use for this site	Kentish Town Road/ Holmes Road corner	The largest vehicle that will serve the site is an 18t vehicle and this will be limited to 9 a day (associated with the Light Industrial Class E use).
51	Paul Seviour	I am writing to object to this planning application for a change of use to a flexible industrial (Class B2)/ storage or distribution (Class B8) depot. I support the use of light industrial Class E. I generally agree with lots of the comments made by others objecting to this application for a distribution depot but I want to make some other comments I don't think have been made elsewhere. 1 I	Kentish Town Planning Framework, London Cycle Network, Queens Crescent	Light Industrial Class E results in similar levels of traffic to the B8 use. The KTPF is relevant here and during pre-application with LBC, it was noted that *'the site also falls into the area covered by the Kentish Town Planning Framework.'*

		don't understand why the Kentish Town Planning Framework is relevant and why it has been quoted to support the application. 3 – 6 Spring Place is outside of the Framework Area. If 3-6 Spring Place had been included in the Framework Area the community would have been able to consider its future use during long and intensive conversations which took place when drafting the Framework. Since that did not happen, I don't see how any of the policies in the Framework area can be directly applied to this planning application. 2 The transport strategy does not take into account the current and emerging strategies for the 2 main routes which will be used by heavy goods vehicles. A Grafton Road is on the London Cycle Network, running from Prince of Wales Road all the way to Gospel Oak. It is also included in the future Healthy Streets, Healthy Travel, Healthy Lives: Camden Transport Strategy 2019-2041. It seems inconceivable that this road would be suitable for heavy goods vehicles. B Queens Crescent will see some significant improvements, including traffic reduction and other measures (as part of a £1m grant Camden council received from the GLA). A consultation under the heading "Safe and Healthy Streets" is underway [Queen's Crescent Motor Traffic Free Environment Trial - We Are Camden - Citizen Space] and includes a proposal to close part of Queens Crescent to all traffic. Taken with the fact that this road is already closed twice a week for the regular market, it seems inconceivable that this road would be available for access by heavy goods vehicles in the future. C Others have commented, from their local knowledge of the area, of the traffic problems that occur daily on the roads that would be used by vehicles entering	closure, trip gen	The largest vehicle that will serve the site is an 18t vehicle and this will be limited to 9 a day (associated with the Light Industrial Class E use). Through the technical work undertaken to date it has been demonstrated that the proposals will not generate a significant number of vehicle movements and the surrounding roads are suitable to carry the anticipated level of traffic. It is acknowledged that there is a requirement for healthy streets proposals to promote walking and cycling, but it is also important to note that there is still a need to safeguard vehicular access on roads for industrial and commercial uses so that key services can be undertaken. As such, it is important to maintain existing vehicle access on surrounding roads to the site, particularly given it is an existing employment site.

		and leaving the proposed depot. Holmes Road is a particularly poorly suited route and I agree with other comments made in relation to this road. I am aware that given the 2 schools that are located at either end, there is a hope that this will become a “Healthy School Route”. The more general point I want to make is that Camden Council’s strategy in terms of vehicle movements is to divert vehicles away from residential neighbourhoods and residential streets. A depot at Spring Place would undermine this policy. All the roads that connect with the roads that emerge at the junction of Spring Place (e.g. Willies Road connects with Holmes Rd) will become fair game. D I want to make one observation about the comparison the applicant has made about the numbers of vehicles used by Addison Lee previously and the proposed use as a depot which I think is misleading. I think the comparison should be from when the building closed. Since it closed (in 2015 I believe), the number of vehicles using the site has been precisely zero. The developer who acquired the site from Addison Lee obtained planning permission for co working space (in September 2016 - 2016/5181/P), which was to be completely vehicle free (aside from normal office type supplies). If that development had come forward, the new building would have had virtually no impact on the roads and the people using the nearby streets. Local people supported that scheme. What we are looking at with this application is that we will be going from a position of zero traffic impact for the last 7 years to the numbers shown in the applicants traffic numbers. This I think is the true		

		comparison when considering the real impact of the depot on the lives of local people.		
52	Inkerman Area Residents Association	… 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. The application states: "On this basis, any future occupier must comply with these requirements. It is likely that these restrictions can then be CLOSELY MONITORED through the ANNUAL surveys as detailed above." Emphasis is added as we do not accept that annual surveys represent close monitoring. Of perhaps even greater concern is the fact that were the change of use to be granted, and were the site were to be sold on, there would be no guarantee that any future owner would be restricted in their use of the site as a warehouse and distribution centre. There seems to be an unanswerable case against the suitability of 3 - 6 Spring place for warehousing and distribution use. Please refuse this application and inform us of the decision Debby Hyams Chair, IARA	Monitoring	Enforcement through planning conditions will be attached to the site and any future occupier. It is now proposed to undertake surveys and monitoring reports every 6 months. In addition to monitoring surveys, there are ways in which companies can track their drivers through technology (Teletrac Navman).

53	G A Hibbs	I object to the requested Change of Use from industrial (Class B2) to flexible industrial (Class B2)/ storage or distribution (Class B8)/ light industrial (Class E) for the following reasons: …2. The building on the corner of Spring Place and Holmes Road is about to welcome approximately 100 LB Camden office staff being relocated from their office in Arlington Road. 3. Upper Willes Road and Cathcart Street are already problematic traffic areas caused by the unregulated arrivals of parents dropping or retrieving pupils from the CFBL school in Holmes Road.	Congestion	As presented in the TS, increases in traffic on these roads would not be significant and well within daily fluctuations roads such as these typically experience.
54	Denis Bittmann	The applicant's risk mitigation strategy is completely insufficient. In particular, the pr very time limited restriction on certain routes during peak school times, i.e. 0830-09 1530 hours, does not reflect our times (e.g. arrival of children from 0800, end time a Wednesdays, walks to local sports centre, etc.) It also ignores the reality of the existi start times and nursery times.	Time restrictions	Servicing vehicles (7.5t -18t) will be prohibited to use Holmes Road between the hours 0800-0945 and 1515-1615. In any case, the analysis shown in the TS shows that vehicles are not expected to travel at peak school times. In addition, the level of traffic generated by the proposals is not significant.
55	Kentish Town Neighbourhood Forum	SEGRO has also misrepresented the Kentish Town Planning Framework, suggesting that reference to 'special servicing arrangements' and 'freight consolidation' justifies the Spring proposals. This is not the case. We have raised this with SEGRO and we understand that this with the council. Furthermore, in relation to any future development of the Veolia site the application site, Policy SSP6 of the Kentish Town Neighbourhood Plan specifically refe of existing employment space by creating new work space for the creative sector to compl creative businesses in nearby Spring Place' - ie not B8 - storage or distribution. We would like to record our concerns regarding the figures purported to be from the previ use. SEGRO acknowledge that they are relying on second-hand evidence within the Vect report. The figures for the previous Addison Lee use are taken from Brockton Capital's pla application. We cannot accept the reported Addison Lee vehicle movements as the premi solely for servicing of car taxis and small delivery vans, which we expect would have take minutes, to complete for each vehicle.	Kentish Town Planning Framework, trip gen	An independent third party survey company undertook the survey of the previous operation and these surveys were accepted by LBC as park of the Brockton Capital Planning application. This has also since been checked with Addison Lee, who have confirmed the numbers are accurate.

56	George Coulouris	This objection to the proposal is from Camden Cycling Campaign, the local borough group of London Cycling Campaign. We represent the interests of cyclists living or working in Camden and aim to expand the opportunities for all to cycle safely in the borough. We have discussed this consultation by email and online (using Cyclescape). We object strongly to this scheme for the following reasons. The proposed use as a distribution centre (B8) is in direct conflict with Camden's and TfL's plans to enable safe cycling and walking on the adjacent roads, as expressed in their respective Transport Strategies. Specifically: 1. Camden is currently consulting on a TfL funded scheme for west Kentish Town that will eliminate through traffic in Queens Crescent and on Grafton Road. The plans would pedestrianise a section of Queens Crescent and improve Queen's Crescent as a market and a public space. The scheme is very likely to go ahead in some form. 2. Camden are also working with TfL funding to complete an extension of the C6 Cycleway to Hampstead Heath via Grafton Road which will then offer a safe cycling route between Blackfriars Bridge and Hampstead Heath and many points between. 3. Given the above-mentioned plans for restrictions on two of the adjacent roads mentioned in the application as access routes, Holmes Road would be the only remaining option for access. But any significant increase in traffic on Holmes Road is unconscionable. It is the only east-west vehicle route through the area and it is already plagued with motor traffic, deterring cyclists and pedestrians who are nevertheless forced to use it. It is also very narrow in places. 4. We find the passing reference in the application to the use of cargo bikes for last-mile delivery very	London Cycle Network	Queens Crescent and Gillies Street will not be used as routes for the development traffic. The development will not result in a significant number of vehicle movements and when compared against previous uses, it will lead to a significant reduction in vehicles. The site is an existing employment site and as such requires vehicle access. It has been demonstrated through swept paths and a live tracking exercise that surrounding roads are suitable to carry the type and level of traffic on surrounding roads.

		unconvincing. No estimate is given of the planned daily number of deliveries by bike whereas around 10 HGV movements and 100 car/LGV movements per day are expected. 5. Whatever commitments on the vehicle movements are made by the applicant, it is hard to envisage any arrangements for monitoring and compliance enforcment that could be effective. 6. The only type of parcel depot that is compatible with the above aims to preserve and improve the residential character of the area would be one that achieved 100% of its last-mile deliveries by cargo bike with no motor vehicles apart from a very small number of HGV movements at night. We consider it illogical that planning applications often appear to be considered and recommendations made with little or no consideration of Camden's transport and active travel plans and requirements. We sincerely hope that this application will not be another instance of that.		
57	Rafe Bertram	I object to this planning application as it will undermine much needed footfall and take much needed retail focus and footfall away kentish town high-street. It is critical that the Highstreet remains the key distinction for the neighbourhood and creating a distribution hub here will undermine the retail offer on the highstreet and the footfall going to it. It will also add traffic to local roads in the neighbourhood, take away employment space, take the site away from use potentially used for affordable housing. Furthermore: - there is very little clear benefit in terms of the S106 statement - I would have thought that site could capture more renewable energy than shown.	S106, renewable energy	The site will remain as an employment site. There is a commitment to 25% EV provision, which exceeds London Plan standards. As the market availability and technology improves it is the aspiration of SEGRO to increase the electrification of the fleet at the site. The development will not result in a significant number of vehicle movements and when compared against previous uses, it will lead to a significant reduction in vehicles.

		- There seems to be no commitment to electric vehicles, although they say that the infrastructure will be added to enable charging		
58	Laurent Samson	To Whom It May Concern: This is a letter to request that Holmes Road, in Kentish Town, NW5 be made into a Healthy School Street in Camden Holmes Road, just off of Kentish Town Road, spans only 400 meters, and has two large schools at either end of the street. The first school, St Patrick's Catholic Primary School, has around 250 students from the ages of three to eleven years old. The second larger school, College Francais Bilingue de Londres (CFBL), has around 700 students from the ages of three to fifteen years old. Due to the age range of students at both schools - the road has a constant stream of children, parents and teachers, due to the staggered school times for classes. We are unaware o any road in Kentish Town that has two large schools in such close proximity, making the street a perfect candidate for a Healthy School Street. The street is currently heavily congested with suspected high levels of pollution considering its high proximity to high traffic roads such as Kentish Town Road. We would also like to raise the urgency of getting this approved due to the recent planning permission submitted to Camden Council to change a neighbouring building (3-6 Spring Place - directly opposite the CFBL) to a high volume 24/7 delivery depot. The planning application number is 2020/5913/P and was submitted by the property group Segro. This planning application has already had numerous objections from local residents, the Kentish Town Neighbourhood Forum, and the Inkerman Area Residents Association, due to the increased traffic and pollution tha will endanger both residents and students. The street already has a high-volume of traffic due to the Camden Vehicle Depot and the Kentish Town Police Station, and any additional traffic is dangerous and unwelcome. The planning application details using Holmes Road as the primarily route for local 24/7 delivery trucks. While the application has some concessions around shifting traffic volume at peak school hours - this does not go fa enough to ensure the safety of residents and children, particularly considering the staggered school hours. The applicant anyway plans to let the premises to third parties which will also possibly hire self-employed drivers for operations. This means that any promises made in the application may not in fact be implemented or enforced to a level satisfactory to protect children and their families on that road, in any event. We implore Camden Council to reject the planning application and transform Holmes Road into a Healthy School Street. We hope that the needs of Camden residents and their families comes before the needs of large businesses like Segro. While we understand the increasing need for logistics companies during the pandemic – we hope that the pandemic will have ended by the end of the year, and a longer term focus should more appropriately lead to a decision in favour of protecting our children. We are sure that other more appropriate locations than next to primary schools and in the middle of residential areas can be identified by Segro instead. I have also copied in the Camden Planning Office and our local MPs to make them aware of this request. Kind regards Laurent Samson	Healthy School Street	Servicing vehicles (7.5t -18t) will be prohibited to use Holmes Road between the hours 0800-0945 and 1515-1615. A review of accident data of pedestrians and cyclists in the vicinity of the school show there are very few recorded between 2014 and 2018. As the development will not result in signifcant number of vehicle movements (and in any case will be lower than the previous use) and as such the risk of pedestrian/cyclist collisions will not be increased. The development will not result in a significant number of vehicle movements and when compared against previous uses, it will lead to a significant reduction in vehicles.

59	Jenny Headlam-Wells	The application is from SEGRO, a property investment company operating as a Real Estate Investment Trust (R This is an investment vehicle with tax advantages. REITs are recommended as part of a balanced investment portfolio. The SEGRO directors and investors are, however, unlikely to have a close involvement or interest in Kentish Town community. Their use of a planning agent, 'Iceni Projects', to further this application underlines 'arms-length approach to the neighbourhood. Furthermore, while SEGRO are the owners of the premises, they not the end-users. This will make the enforcement of commitments made in the planning application difficult Camden to monitor and police. Indeed, as they point out in section 15 under Own Driver Franchise Model, 'As end occupier of the site is not known at this stage, it is difficult to predict the final model the future occupier w and exactly when vehicles will arrive to and depart from the site'. This demonstrates a complete lack of awarer and concern for the current road traffic problems in the host neighbourhood.	Unknown end user	Enforcement through planning conditions will be attached to the site and any future occupier.

Appendix B

SEGRO Sustainability Commitments and Assessment of the Zero Emission Commercial Vehicle Market.

1.1 | The objective of this document is to communicate SEGRO's commitment to sustainability delivered through the companies 'Responsible SEGRO' programme and to provide information on the current technology available in the zero-emission commercial vehicle marketplace, and its future development.

1.2 | This document has been prepared by Rob Fowler of Fowler Consulting Services Limited. Rob is a sector expert having previously led DPD's award winning urban logistics, electric commercial vehicle and sustainability programmes before joining Volta Trucks as CEO, an all-electric medium duty commercial vehicle manufacturer.

An outline of SEGRO's Sustainability Commitment and Net Zero Vision

2.1 | SEGRO's 'Responsible SEGRO' strategy identifies the companies three long term CSR priorities, championing low-carbon growth, investing in local communities and environments, and to nurture talent. Contained with the championing low-carbon growth priority is SEGRO's commitment to be **carbon net zero by 2030.** As an interim step SEGRO have committed to reduce the carbon intensity of its operated properties by 40% when comparing 2025 to the baseline year of 2017.

2.2 | To achieve this objective SEGRO seek to reduce carbon associated with the company's development of new buildings, the operation of the buildings within the company's portfolio through the deployment of technology, and finally through offsetting any residual carbon emissions.

2.3 | SEGRO seek to reduce energy consumption within the company's portfolio and increase the use of renewable energy through the installation of on-site generation equipment and the use of renewable energy and transport solutions, working with its occupiers to deliver upon the target.

An Overview of Commercial Zero Emission Vehicle Technology in the Market Place Today

3.1 | The number of small electric and zero emission commercial vehicles (**3.5t and below**, an example is shown in image 1) has increased significantly in recent years. The total number of licensed battery light goods electric vehicles increased by 188.8% between the end of 2016 and 2020 from 5,400 to 15,500. This number has increased as technology has improved, and manufacturing supply has increased however 15,500 represents only 0.37% of the total number of light commercial vehicles in Great Britain. In total 1,400 electric hybrid or range extended vehicles were in operation with gas vehicles accounting for a further 4,800 light commercial vehicles[1]. The Department for Transport did not report on hydrogen fuel cell light commercial vehicles as the number is so low (only 283 fuel cell vehicles were registered at licensed at the end of Q1 2021 across all vehicle types and weights)[2].

Image 1 – example of a commercial vehicle under 3.5t

3.2 | **Electric assisted or pedal powered cargo bikes** (an example is shown in image 2) have received an increased level of attention as city authorities across the world seek to reduce congestion and improve air quality in city centres. Cargo bikes have not yet reached large scale mainstream operational deployment and still represent a very small proportion of commercial vehicles on the road. The 2020 CityChangerCargoBike (CCCB) project surveyed cargo bike manufacturers across the European Union, UK, Norway, Iceland, Switzerland and the Balkan countries. The CCCB survey reported sales across these geographies of 28,532 units in 2019 with forecast sales of 43,610 units in 2020 (the definition of cargo bike incorporates those used for people movement as well as goods of which 49% were for private use and 51% for commercial use in 2019)[3]. Even with this optimistic growth curve in 2021 this number accounts for just 0.13% of all light commercial vehicles in use across the European Union, EFTA and UK[4]. Cargo bike manufacturers currently lack maturity and the ability to scale, with none of the companies surveyed selling more than 5,000 cargo bikes in 2018, and only three expecting to do so in 2020[5]. The suitability of cargo bikes for operational deployment is limited to certain use cases, generally speaking the payload, volume (maximum 200kg and 2m^3 respectively) and range are low when considered against traditional light commercial vehicles. This constraint means cargo bikes are only suitable for select use cases where the constraints can be worked around such as small, lightweight delivery products located within a tight geographical area close to the distribution building and are therefore suitable as part of a fleet mix, or in smaller distribution units with limited delivery areas.

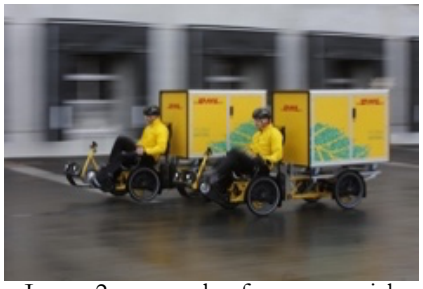


Image 2 – example of a commercial cargo bike

3.3 | Historically the **3.5t** Mercedes Sprinter size vehicle (an example is shown in image 3) has been the workhorse of the distribution industry however the electric versions of 3.5t vehicles have been slow to arrive in the UK market (this includes vehicles covered by the Department for Transport license derogation to 4.25t). These vehicles are preferred by operators based on the need for a larger, flexible load space and as only a traditional car driving license in required. At the time of writing, very few manufacturers have good quality supply of electric 3.5t vehicles, and despite the limited battery range the price of these vehicles is high in comparison to diesel equivalents. List price from three manufacturers have a base price of over £50,000[6] making them nearly twice the price of a combustion engine equivalent. Supply of these vehicles is expected to increase leading to price competition (and consequent reductions) whilst technology improvements will lead to greater operating range.

Image 3 – example of a commercial 3.5t size vehicle

3.4 | The number of **7.5t or greater ULEV or zero emission** vehicles (an example of a 16t vehicle is shown in image 4) in UK operation today is even lower, with 16 registered for the first time in all of 2020, and 30 in Q1 of

2021[7]. In total 421 ULEV HGVs were operating at the end of Q1 2021 with only 23 registered in London[8]. In the UK at the end of Q1 2021 485,500 HGVs were in operation[9], with the 421 ULEV HGVs representing 0.09% of these vehicles. The roadmap for manufacturer supply of electric HGVs is unclear, and although multiple manufacturers have announced the intention to produce these vehicles at scale in right hand drive versions the true roadmap to mass deployment remains uncertain. Operators also harbour significant concerns about the technology such as the range, charging infrastructure requirements, residual asset value, loss of payload due to battery weight and the significant purchase price of these vehicles.

Image 4 – example of a commercial 16t size vehicle

A Description of Technology Maturity in Zero and Ultra Low Emission Commercial Vehicle Fuel Types and Charging Infrastructure

4.1 | A recent report compiled by Ricardo for the UK Government's Committee on Climate Change acknowledges that battery electric is the most promising technology for the decarbonisation of the light vehicle sector[10]. This matches with the trends from the Department for Transport data discussed in section 3.1 of this document where battery light commercial vehicles are accelerating ahead of any other fuel type. Battery electric technology is highly suited to light commercial vehicles in the distribution sector as these vehicles travel shorter distances from their base depot, have been engineered without impact on the vehicles payload and volumetric capacity and are stationary overnight leading to reduced charging demand. The majority of light commercial electric vehicles have been deployed by large global fleet operators, and the second hand market is only just establishing itself. It is expected that battery electric will be the fuel type of choice for light commercial vehicles long into the future.

4.2 | The roadmap for heavy goods vehicles is less clear, with both battery electric and hydrogen fuel cell identified as long-term competitors for diesel combustion engines. The discussion around electric and hydrogen is complex and currently without a clear winner, however, below is a brief overview of each fuel type and charging infrastructure requirements. Although some compressed natural gas HGVs have been constructed and are in operation, it is not felt that CNG is a long-term solution to the climate crises and its sustainable credentials are questionable, particularly as a result of methane leakage.

4.3 | Nearly all modern electric vehicles are constructed with a lithium-ion battery, with the predominant sub-chemistries being lithium-ion phosphate (LFP) or nickel manganese cobalt oxide (NMC). Lithium-ion based research and development is extensive with 8,300 patents filed outside of China in 2019[11] as the technology develops. Significant research has been undertaken into cell development, cell degradation and lifecycle analysis. Future technology developments in electric vehicle batteries have focused upon the development of solid-state batteries and chemical composition of batteries and it is expected that overall battery energy density will improve significantly. Both battery types under the lithium-ion banner place demands on raw materials, particularly cobalt in NMC batteries which has an impact on the electric vehicle overall footprint. The technology has a growing data bank given its extensive deployment in nearly all modern electric vehicles and continues to mature rapidly. Operator

confidence in the vehicle batteries will continue to grow as evidence of successful deployment becomes available and more vehicle product lines are in development by manufacturers and moving towards serial production. Currently no mass-produced major manufacturer zero emission HGVs are available at scale today and they remain a number of years away from mass production.

4.4 | The UK electric charging infrastructure challenge has been well documented with the UK government forecasting a public charging requirement of 10 times the current provision[12]. The charging of light commercial vehicles is less challenging as these vehicles have smaller batteries and are generally parked for a longer period therefore slow speed charging is acceptable. In HGVs, given the significant purchase price, high levels of operational utilisation will be essential to ensure they are commercially viable. The batteries for these vehicles are also considerably larger than light commercial vehicles to cope with the additional weight load (e.g., Tesla Semi – 500kwh, Volvo – 396kwh). Achieving high utilisation will require ultra-rapid charging, most likely a minimum of a 100kw charger that comes with a potentially localised grid upgrades and a considerable purchase and installation price. The UK public infrastructure in locations with ultra-rapid charging and suitable HGV access is currently very small.

4.5 | Hydrogen has been used as a fuel for many decades however its application to fuel cell vehicles has only started to move forwards at pace in the last few years and the UK government provided a £23 million hydrogen powered vehicle and infrastructure grant scheme in 2017[13]. To power a vehicle, tanked hydrogen is mixed with oxygen to generate electricity that is then fed through an inverter into a battery pack linked to an electric motor that drives the vehicle. The only biproduct of the chemical reaction local to the vehicle is water. Small amounts of hydrogen HGVs are on the road today although it is perceived that the technology lags behind battery, particularly due to the cost. It is however expected that the range of hydrogen HGVs will be considerably higher than electric vehicles although the on-vehicle hydrogen storage requires development. A large amount of debate exists around the sustainability credentials of hydrogen generation, green hydrogen has the potential to be generated using zero carbon technology however it is expected to be very expensive until at least 2030. Pricing for hydrogen HGVs has not yet been released due to a lack of supply and maturity and a viable roadmap for scaling has not yet been evidenced. The technology is unlikely to see rapid deployment and scale until much later in this decade.

4.6 | The lack of hydrogen fuelling infrastructure is a significant barrier to uptake of fuel cell HGV's. The UK currently has 11 hydrogen charging stations[14] with five located within the M25. Hydrogen can either be delivered to a fuelling station or generated onsite and is delivered in either gaseous or liquid form. On site production can be achieved through the process of electrolysis combined with solar electricity generation. According to a study in North America contained in the Joint Agency Staff Report the cost per fuelling location is between $2m USD and $3.2m USD[15]. The California Fuel Cell Partnership predicts a hydrogen fuelling station capable of fuelling 25 buses per day would cost around $5m USD[16]. The fuelling of hydrogen vehicles is however considerably quicker than the charging of battery electric vehicles and provides a better range per fuelling. This infrastructure cost has the potential to become prohibitive for all but the largest commercial vehicle operators who can access competitive financing with a large commercial fleet to realise the long-term potential savings.

4.7 | Considering fuel types for HGVs, no outright winner has been decided in the race between hydrogen and battery electric but the technology in both fields continue to improve. Currently battery technology has pushed ahead of hydrogen in its readiness and maturity for commercial deployment, the commitment from manufacturers and the cost of infrastructure. The two technologies are both long term viable solutions working towards the decarbonisation of HGVs.

4.8 | The key concern for operators when considering the choice between electric and hydrogen HGVs is that currently none are ready for market and other concerns include the lack of mass production, sufficient infrastructure, maintenance and servicing provision, evidence of successful performance or cost competitiveness (where pricing has been released). Based on the public information available today it would appear that battery electric HGVs will be on the road first but are still a considerable number of years away from scaling and mass production. It is likely that hydrogen HGVs will be more commonly available after electric HGVs but have the potential to be competitive, particularly on range. It is not suggested that one fuel type will be the solution, and a mix depending on fleet operation might be the solution, just that the technology is not ready for deployment in HGVs in today's market, and won't be ready for a considerable number of years in heavy commercial vehicles.

The Integration of Zero Emission Vehicles into an Economically Viable Operational Site and Fleet Mix

5.1 | When considering the operational processes in a warehousing and distribution building it is important that the approach of the occupier is reflective of the currently available vehicle technology, and the capital availability of the occupier to purchase zero emission vehicles that come with a considerably higher price than a traditional internal combustion engine. The size and number of vehicles deployed is closely related to the size of the site.

5.2 | To make a site operational efficiency, a combination of vehicle sizes is required for both the inbound and the outbound operation. The operator who takes occupation of the site will be seeking to make vehicle movements as efficient as possible, reducing the numbers of vehicle movements and balancing the fleet mix to be reflective of the technology available in the marketplace and within the operators purchasing power.

5.3 | If during the inbound operation the site is unable to be served by the most appropriately size commercial vehicles (either because of operating restrictions in size, or lack of zero emission technology in the desired vehicle size) then it is highly likely the operator will deploy a greater number of inbound vehicles of the largest size acceptable. If too many inbound vehicles are required, then the site will not be commercially viable and the impact on the road network would be greater. In simple terms, a larger inbound vehicle will mean fewer vehicle movements than using multiple smaller vehicles. The volume of goods required to be moved is consistent therefore larger vehicles are more efficient and reduce the overall number of vehicles on the road (as an example, one 18t vehicle has the same volume capacity as approximately three 3.5t sprinter size vans. A warehousing and distribution site will need HGVs to serve the location to make it operationally efficient.

5.4 | On the outbound side of the site's operation, should only small commercial vehicles be available in zero emission, and not reflective of the product size being delivered then the number of vehicles operating from the site will increase and result in an inefficient operation. Following the same principal as the inbound vehicles, its

important that the size of vehicles for the outbound operation are reflective of the volume of goods required to be delivered. Using one larger vehicle can be more effective than multiple smaller vehicles, reducing impact on the road network and improving the operator's efficiency

5.5 | Whilst several fleet operators are making significant steps in deploying light commercial zero emission vehicles, these operators are working on long term sustainability programmes. As an example, DHL are working towards a zero emission 2050 operation, Tesco has committed towards its delivery fleet being all electric by 2028 and John Lewis delivery fleet by 2030. These operators' commitments are reflective of the technology landscape, current vehicle lifecycles and vehicle availability. Most of the effort to deploy electric vehicles by these large operators has focused on final mile delivery vehicles rather than HGVs and has a long transition period.

5.6 | The commitments seen to date around the deployment of electric vehicles has been led by large corporations with significant amounts of capital available to deploy and pressure from shareholders and shippers to decarbonise transport operations. In contrast, the capital availability for SME's is smaller and therefore lifecycles of vehicles need to be stretched to remain commercially competitive, particularly with the recent increase in driver wages. It is important that any site obligations do not prohibit SME's from accessing a high-quality employment site.

5.7 | It is therefore key that the right fleet mix can be achieved on both the inbound and outbound side of the site's operation. The right fleet mix is reflective of both size of vehicles, and the level of zero emission technology available in the marketplace. The sites transport planning needs to be reflective of the technology available today, from the perspective of manufacturers, fuelling infrastructure and operators purchasing power – if it is not, it is likely to lead to either excessive transport movements or a economically unviable site.

Closing Summary and Key Findings

6.1 | SEGRO have a well-documented sustainability and corporate social responsibility programme that the company takes very seriously with a headline commitment of reaching net zero by 2030, as well as an interim target of 40% reduction by 2025. The programme has support from the very highest level at SEGRO and is aligned with UN Sustainable Development Goals. SEGRO are well informed on the EV and zero emissions agenda and up to date with the current trends in the market affecting its occupiers who are also under pressure to change.

6.2 | Reviewing the availability and supply of ULEV and zero emission commercial vehicles shows that good availability and technology exists in the light commercial vehicle size used for final mile delivery in and around cities. Electric vehicles up to 3.5t (4.25t after derogation) are starting to come to market but they are expensive, and range is currently limited. Technology improvements, particularly in vehicle batteries, and an increase in supply (and consequent reduction in prices) will lead to these vehicles becoming increasing viable and ready for deployment for final mile delivery for companies of all sizes. The majority of large fleet operators have a target of deploying exclusively electric vehicles for final mile delivery late in the decade and the infrastructure challenge for these vehicles is achievable. The adoption of these vehicles will scale over the next few years, but full transitions will take until the end of the decade for even the largest fleet operators and policy and decision makers will need to adopt a transitional approach over this period.

6.3 | Cargo bikes are facing both a manufacturer maturity and operational use case challenge - they are suitable for small, low weight local deliveries and consequently should be considered part of a successful fleet mix for an operator rather than the solution to all emissions problems.

6.4 | Considering ULEV and zero emission HGVs the supply is currently unclear, and the pricing, range and payload all impact on the successful deployment of these vehicles. It is likely that the supply chain will improve for HGVs and pricing will become more competitive in the longer term but currently supply is incredibly low, and few examples of successful operation exist. The current focus of operators has been on light commercial deployment as the technology is available. The technology race between hydrogen and electric will continue for the next decade and HGV fleet numbers will grow once the technology becomes available. The infrastructure to support these vehicles will be expensive and will take a number of years until it is ready to support zero emission HGVs. Zero emission HGVs are not currently a viable operating vehicle and will not be for a number of years.

6.5 | The sites transport requirements needs to be considered against the size of the building and the vehicles available in the marketplace to make the site attractive to large fleet operators, and not to exclude SME's from the opportunity to secure a high quality employment site with capital intensive vehicle procurement requirements.

6.6 | SEGRO are keen to see ambitious targets around zero emission vehicles (both light commercial and HGVs) but these targets must be reflective of the technology available in the marketplace to ensure they can be achieved, and the occupiers of this site can be commercially viable.

Appendix - Data Sources

1. Department for Transport Data Table VEH0403 - Licensed light goods vehicles at the end of the year by propulsion / fuel type, Great Britain from 1994; also United Kingdom from 2014 (accessed Monday 13th September 2021).
2. Department for Transport Data Table VEH0133 - Ultra low emission vehicles (ULEVs) 1 licensed at the end of quarter by propulsion / fuel type, including top 20 models for the latest year, United Kingdom from 2010 Q1 (accessed Monday 13th September 2021).
3. http://cyclelogistics.eu/sites/default/files/downloads/Survey_market_sitze_results.pdf
4. https://www.acea.auto/files/report-vehicles-in-use-europe-january-2021-1.pdf
5. https://cyclingindustries.com/news/details/growth-and-trends-of-cargo-bike-sales-in-europe-we-need-your-input
6. https://www.parkers.co.uk/vans-pickups/best/electric-vans/
7. Department for Transport Data Table VEH0171a - Ultra low emission vehicles (ULEVs) 1 registered for the first time by bodytype and propulsion / fuel type, including top 20 models for the latest year, United Kingdom from 2010 Q1 (accessed Monday 13th September 2021).
8. Department for Transport Data Table VEH0130 - Licensed ultra low emission vehicles (ULEVs) 1 at the end of quarter by bodytype and plug-in grant (PiG) eligibility 2, including regional breakdown for the latest quarter, United Kingdom from 2010 Q1 (accessed Monday 13th September 2021).
9. Department for Transport Data Table VEH0101 - Licensed vehicles at the end of the quarter by body type, Great Britain from 1994 Q1; also United Kingdom from 2014 Q3 (accessed Monday 13th September 2021).
10. https://www.theccc.org.uk/wp-content/uploads/2019/05/CCC-Zero-Emission-HGV-Infrastructure-Requirements-Ricardo-Energy-Environment.pdf
11. https://www.current-news.co.uk/blogs/ev-battery-tech-and-patenting-a-look-at-the-new-technologies-vying-for-li-ions-crown
12. https://www.gov.uk/government/publications/electric-vehicle-charging-market-study-final-report/final-report
13. https://www.gov.uk/government/news/23-million-boost-for-hydrogen-powered-vehicles-and-infrastructure
14. https://www.drivingelectric.com/electric/1363/where-can-i-buy-hydrogen-and-where-is-my-nearest-hydrogen-filling-station
15. http://www.energy.ca.gov/2015publications/CEC-600-2015-016/CEC-600-2015-016.pdf
16. https://h2stationmaps.com/costs-and-financing