

Delegated Report		Analysis sheet		Expiry Date:	22/03/2021
		N/A		Consultation Expiry Date:	12/09/2021
Officer			Application Number(s)		
David Peres Da Costa			2020/5913/P		
Application Address			Drawing Numbers		
3-6 Spring Place London NW5 3BA			Refer to draft decision notice		
PO 3/4	Area Team Signature	C&UD	Authorised Officer Signature		
Proposal(s)					
Change of use from industrial (Class B2) to flexible industrial (Class B2)/ storage or distribution (Class B8)/ light industrial (Class E), refurbishment of existing building including replacement roof, installation of PV panels; installation of wood cladding to parts of Grafton Road and Spring Place elevation; installation of living wall and alteration to entrance on Grafton Road elevation; and widening and reconfiguration of loading doors onto Spring Place.					
Recommendation(s):		Refuse planning permission			
Application Type:		Full planning permission			

Conditions or Reasons for Refusal:	Refer to Draft Decision Notice				
Informatives:					
Consultations					
Adjoining Occupiers:	Consultation January 2021	No. of responses	525	No. of objections	525
	Re-consultation (revised scheme) August 2021	No. of responses	337	No. of objections	337
Summary of consultation responses:	<p>Two site notices were displayed from 20/01/21 to 13/02/21 and the application was advertised in the local paper on 21/01/21 (expiring 14/02/21).</p> <p>Five hundred and twenty five objections were received from neighbouring occupiers and interested parties.</p> <p>A significant number of the objections were from parents of children who attend the two schools on Holmes Road.</p> <p>The following issues were raised.</p> <p>Transport</p> <ul style="list-style-type: none">- <i>Holmes Road has two large schools at either end of the street. 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.</i>- <i>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.</i>- <i>We implore Camden Council to reject the planning application and transform Holmes Road to a Healthy School Street.</i>- <i>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.</i>- <i>There is already a Camden Council vehicle depot (Veolia) which has high volumes of large trucks every day.</i>- <i>Holmes Road is already very congested</i>- <i>Holmes Road is very narrow in places and totally unsuitable as an access route.</i>- <i>While the application has some concessions around shifting traffic volume at peak school hours - this does not go far enough to ensure the safety of residents and children, particularly considering the staggered school hours.</i>- <i>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</i>				

cars. Footfall is very high, with children walking to and from several schools, shoppers going to the High Street and students to their accommodation.

- The streets are narrow with parking at the sides, which makes it very difficult for large vehicles and vans to negotiate them.
- It will be dangerous for students of St. Patrick's Primary School, if big vehicles constantly pass by. That road is quite small and lots of children are using that road frequently.
- 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.
- Given that there is an industrial estate on Regis road less than half a mile away it is hard to justify this plan.
- The Council's Framework Plan for the area identifies Murphy's Yard and Regis Road as areas for industrial development.
- 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.
- 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. I would ask that the following be taken into account. First, Addison Lee operated the site in the daytime and only on weekdays. There was not a 24 hour operation. Secondly 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.
- If this application is approved, 75%, of vehicle movements should be by zero emission vehicles, of which a percentage should be by bicycle/cargo bike.
- Ryland road is already disrupted by traffic as cars use this road to turn right to get onto Prince of Wales road due to the one way. Adding extra traffic would cause more disruption and distress to residents.
- Increased traffic
- HGV lorries passing through our small street
- Safety of our children
- Disruption of play streets and other community activities
- Residential area
- There is a nursery at the junction of Queens Crescent and Gillies Street, plus Carlton primary nearby
- Traffic of lorries 24/7 is a nuisance to all residents, schools and nurseries on the roads around Spring place.
- This is completely against Camden's policy to prioritise pedestrians and cyclists
- In normal times, all local schoolchildren use the proposed routes for access to Kentish Town Sports Centre throughout and after the school day.
- Holmes road is a street full of children from 8am to 9am, 12pm to

1pm and 3pm to 4.30pm when school finishes.

- The depot also poses a threat to wider members of the population using the GP Practice on Queen's Crescent and the daily 'Older People's Services' provided by Queen's Crescent Community Centre.
- It will clog up narrow streets as lorries struggle to turn, potentially causing traffic jams and the rise of rat runs in surrounding residential roads. Emergency vehicles such as ambulances and police cars could also be held up with serious consequences.
- The road surfaces will be damaged by the weight of the HGVs, causing subsidence and potholes which are hazards to other road users.
- 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.
- This is an already extremely congested and polluted residential area
- The junction of Holmes Road with Kentish Town Road gets incredibly congested and an increase in traffic, which this development would inevitably generate could prove to have catastrophic implications.
- There is a dangerous corner at the junction of Gillies Street and Queens Crescent, which is a main part of the route.
- The location gives no immediate access to major traffic flows and forces drivers to use what should be quiet residential roads.
- The air quality of Holmes Road and Grafton Road is already compromised by the existing volume of traffic and the bottlenecks caused at the exits to Kentish Town Road and the routes to Prince of Wales Road.
- The proposed use for this site would generate an unacceptable level of heavy goods traffic and even more lighter vehicle use through surrounding residential streets, and especially through Holmes Road which can already prove a bottleneck for two-way traffic
- The main points of access proposed are Grafton Road, which is extremely narrow and itself hard to access, and Queens Crescent, which has a street market.
- There are trees on the streets which would be damaged by large vehicles trying to pass each other in such narrow streets.
- This proposal goes against everything Camden Council is trying to do to improve air quality and decrease traffic flow in built up residential areas such as this.
- The junction by this warehouse is small and constantly jammed with vehicles.
- Concerned about continuous traffic 24 hours a day with staff and drivers arriving.
- There is already a huge amount of traffic on Willes Road all day. There are parents picking up and dropping off children at different times, many of them hoot and argue and clog the road up while they try and park. There are large older children flocking the pavements and spilling dangerously over into the roadway, plus scooters, bikes and footballs.
- An increase in motor vehicles would endanger cyclists
- 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.
- Increased pressure on Prince of Wales Road and Kentish Town Road both of which are frequently congested.
- 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.

- Will result in more smaller vehicles using the Inkerman Road conservation area as a rat run.*
- Is this outside loading bay for HGV's enclosed to stop noise to residents?*
- 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 to protect cyclists?*
- One of their routes, Queen's crescent is going to be pedestrianised.*
- Queens Crescent is totally closed to all vehicular traffic on Thursdays and Saturdays.*
- Where is this living wall and size of it in metres squared? Their renders show it inside the building. Why no living roof as well?*
- For me as a cyclist or pedestrian, HGVs and LGVs are an equal threat as LGVs (vans) are smaller, tend to travel at higher speeds and less of a vehicle to see coming.*
- There are considerable concerns that, if B8 use is granted, the detailed proposals are unworkable and the conditions unenforceable.*
- To control the volume of lorries, van and cars in general, the Council have put traffic controls at the top of Grafton Road. It is totally unsuitable for 24 hour vehicle delivery and dispatch vehicles. This is even more so since Addison Lee closed some years ago.*
- Would be very problematic for pedestrians and cyclists in the area*
- Would make it difficult for schools drop off and pick up*
- Increase the risk of accidents involving the additional vehicles and the young pedestrians who reach the nearby schools on foot / scooter.*
- 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 Belisha crossings nor clear signs that there is a school.*
- A complete transgression and contradiction with the Kentish Town planning framework.*
- 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.*
- Already we face huge numbers of UPS delivery trucks cutting through to get to their base in Regis Road, alongside the numerous Camden and Veolia council and rubbish vans in Spring Place and Holmes Road - a further distribution centre in Spring Place is simply too much and wholly unacceptable.*
- Struggle to understand how an HGV could navigate the entrance/exit onto Spring Place.*
- 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.*
- 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: Queen's Crescent and Grafton Road*
- 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.*

- 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.
- We will be going from a position of zero traffic impact for the last 7 years to the numbers shown in the applicant's traffic numbers. This is the true comparison when considering the real impact of the depot on the lives of local people.
- 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.
- Travelling south along Grafton Road leads to a left-turn only junction with Prince of Wales Road.
- The application mentions Arctic Street. This is a street almost directly opposite the premises. This is possibly another example of very ignorant planning since it is currently a narrow, entirely residential street ending in a dead-end.
- Holmes Road is used day and night by throngs of students from the large Unite student accommodation blocks on it.
- The French school has a staggered start/end between younger and older levels, with students coming and going over an extended period of time.
- The assessment by Vectos of how many vehicles would be likely to service Spring Place and how many deliveries these vehicles would carry out, are based on a) just a few B8 sites in central London and b) they use inaccurate numbers.
- VECTOS calculates with each vehicle doing one daily round trip only. This appears to underestimate the amount of round trips in a 24 hour resp. 19 hour business operation. I would calculate that B8 use would result in 2-3times as many vehicle movements (180-270 daily movements).
- There seems to be no commitment to electric vehicles, although they say that the infrastructure will be added to enable charging.
- Proposal should be for a cargo bike "spoke": last mile can easily be done by cargo bike. In particular "E-cargo bikes" are an emerging technology with a low carbon footprint and lower running costs when compared with vans. Camden Council is also committed to improving local cycle route connections and a cargo bike spoke would be consistent with this policy.
- Location is isolated with no routes to the East except along Holmes Road past two schools to a narrow congested junction with Kentish Town Road. The route north has a width restriction and a timed closure.
- The mission for healthier streets will be significantly compromised by the allowance for a distribution centre

Amenity

- The pollution and noise will really affect residents.
- 24/7 activities in the area will mean constant lorry noise and pollution, impacting health and wellbeing.
- The increase in air pollution will not only be as a consequence of the delivery vehicles but also the unavoidable increase in traffic congestion which will result in existing transiting vehicles to also spend more time in the area.
- Increased air pollution and noise will affect pupils at the nearby schools.
- Vibration is also a problem, especially where heavy vehicles and high

	<p>levels of traffic are expected to circulate.</p> <ul style="list-style-type: none"> - Noise of loading/unloading at antisocial hours is very considerable and unacceptable. - The noise this depot would make through the night will be disturbing and inconsiderate to residents. To have large lorries travelling up and down the roads throughout antisocial hours would be disruptive and inconsiderate to residents. - Against the Mayor of London's school air quality program. - The construction work would cause horrible pollution, noise and traffic. - Concerned that there would be a succession of large vehicles arriving at various times including, most likely, early in the morning. They would then unload within earshot of a block of flats close by and rows of residential accommodation either side of the road only a few metres north. - Likely resulting in increased traffic in the surrounding residential area. This would especially be of great concern during night time - Veolia vehicles already contribute significant noise in the area. - There is now well-established evidence of the damage caused by air pollution from road traffic to children's health and development, including the ruling in December 2020 by Southwark Coroner's Court that air pollution made a 'material contribution' to the death of a nine-year-old girl in South London. Even low-emission and electric vehicles create dangerous particulate matter from their movements. - We live directly opposite (73 Grafton Road) & 2 of our bedrooms are on the ground floor facing onto the street - 24 hour heavy traffic will be a nightmare & make it impossible to sleep/sell our property. The bridge amplifies noise in the locale & this will be intolerable 24-7. <p>Other</p> <ul style="list-style-type: none"> - This will devalue our properties - This application is completely unsuitable for our area with much of it a conservation area. Would harm the residential nature of the Inkerman Area Conservation Area; by making it more polluted, less quiet and threatening its architectural style and integrity. - Would introduce increased light pollution to this area. - 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. - The CFBL school is a Grade II listed building and HGV produced vibrations could imperil its foundations or structure. - A distribution centre would probably have to have its own fuel tanks for the fleet of cars, vans and HGVs it intends to host. Such tanks would also create serious health and fire hazard in such a small street/neighbourhood. - The application also includes the creation of "electric vehicle charging points and/or hydrogen refuelling facilities", but no risk assessments of such facilities at such a close proximity from a school. - Timing of the application/unfair consultation process: consultation deadline too short. - I 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
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- 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.*
- *Creating a distribution hub here will undermine the retail offer on the highstreet and the footfall going to it.*
 - *The proposal will take the site away from use potentially as affordable housing.*
 - *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.*
 - *The site in Spring Place should be turned into accommodation in line with the London policies to increase number of dwellings.*

Officers were also sent a copy of a letter sent to Camden's Healthy School Streets team, requesting that Holmes Road be made into a Healthy School Street. This letter was sent in by 14 individuals.

Following revisions to the proposed development, a re-consultation process was undertaken involving site notices and newspaper advertisements. Two site notices were displayed 13/08/21 and an advert was published in the newspaper 19/08/21. A further 337 objections were received.

As with the original consultation, a significant number of objections were received from parents of children who attend College Francais Bilingue de Londres on Holmes Road. The following additional points were made.

- *The applicants have committed to a very small usage of electric vehicles (an aspiration to achieve 25% of traffic from EVs within 3 years). This is nowhere near high enough, undermining both the London ULEZ and Camden's own stated traffic and pollution reduction targets.*
- *The 'concessions' for updating delivery times fails to resolve the staggered nature of the school times. The statement that Holmes Road is used by large vehicles at present is simply false - the only delivery company is Gorillas which uses electric bikes.*
- *The hours Segro has indicated for when LGVs will leave and return to the depot coincide with peak drop-off and pick-off for the schools and nursery, which would cause unavoidable danger to children. Grafton Road, Holmes Road and Willes Road include residential parking and tight corners, creating poor visibility and substantial risk of accidents.*
- *If planning permission is granted, Camden Council will effectively be opening the doors to potential 7-day, 24-hour HGV and LGV traffic on unsuitable, residential streets, resulting in multiple health, safety and environmental hazards.*
- *Segro (the applicant) are the owners, not the users of the site. The user could be a company running its own fleet, or have drivers using their own vehicles.*
- *The "baseline traffic flows" study does not seem to provide reliable information. It is highly likely that it relies on 'post COVID' traffic numbers which are not representative.*
- *Concern over live tracking exercise as the issue is not so much that HGV cannot go through Holmes Road or Grafton Road, but rather whether HGVs and other delivery vehicles used once the site is in operation can operate on that road safely.*
- *Recent press reports show that explosions at warehousing sites are not uncommon and can cause very serious damage to neighbouring houses or land. The proposed application does not consider any such*

risks.

- *The application is inconsistent with key strategic objectives of Camden's Plan,*
- *Proposal inconsistent with application for Holmes Road to become a Healthy School Street.*
- *Restrictions on hours that HGVs would use Holmes Road only applies to servicing vehicles and so would only apply to a fraction of the anticipated traffic from/to the site and that high levels of traffic could be caused including at 'core' school hours.*
- *Concern about the enforceability of applicant's commitments*
- *Traffic calming in the west side of Kentish Town means the only suitable access to the site will be via the south end of Grafton Road. This part of the road is already seeing increased traffic as a result of road closers in and around north 'Grafton Road and Queen's Crescent.*
- *Willes Road will be a key access route south for departing vehicles. Yet this is an entirely residential street, wholly unsuitable as a rat run for regular servicing vehicles.*
- *Although SEGRO conducted its own study of traffic movements on Holmes Rd, Grafton Rd, Kentish Town Rd etc in February 2021, the results of the study were not submitted in the amended application/assessments. It would be helpful to know what the results were and why SEGRO did not submit them in the framework of the amended application.*
- *SEGRO as landlord exercising power by a yearly review would not be able to guarantee the number of vehicles in use, nor the timings or the use of the proposed routes.*
- *There is a major delivery company that operates in this area already (UPS), plus an end-customer-delivery company (Gorillas), etc. There is simply no physical space for more vehicles.*
- *Concern that potential tenants would claim to have an electric or emission free fleet, but in reality, have hybrid electric vehicles (with both electric powertrain and internal combustion engine), allowing drivers to switch back to petrol or diesel engine. It is not possible to monitor on which powertrain (electric or petrol/diesel) such electric vehicles are at the time they are driving to/from Spring Place site.*
- *I would like to mention the fact that deliveries from the depot are often going to be by van or motorcycles at any time of the day and night, possibly driven by self-employed delivery people who will choose whatever route they wish - so any reassurances about volume or direction of traffic is meaningless.*
- *The council cannot justify permission for this proposal as it is totally contradictory to their current efforts to make a more safer and habitable neighbourhood.*

The Kentish Town Neighbourhood Forum (KTNF) - object

We remain unconvinced that the Spring Place site is suitable for B8 storage or distribution use

In particular we object to the proposed change of use from industrial (B2) to flexible industrial (B2) / storage or distribution (B8) as the surrounding area is predominantly residential, and also includes 3 schools, a nursery and student housing.

We have raised concerns around the proposed change of use with SEGRO including the impact of a potentially significant increase in vehicle movements on surrounding residential streets and the potential for intrusive noise at proposed early morning and late evening HGV delivery times, 7 days per week. SEGRO have not been able to address these concerns.

SEGRO has also misrepresented the Kentish Town Planning Framework, suggesting that the Framework's reference to 'special servicing arrangements' and 'freight consolidation' justifies the Spring Place proposals. This is not the case. We have raised this with SEGRO and we understand that they will clarify this with the council. Furthermore, in relation to any future development of the Veolia site which is opposite the application site, Policy SSP6 of the Kentish Town Neighbourhood Plan specifically refers to 'Retention of existing employment space by creating new work space for the creative sector to complement the creative businesses in nearby Spring Place' – i.e. not B8 - storage or distribution.

We would like to record our concerns regarding the figures purported to be from the previous Addison Lee use. SEGRO acknowledge that they are relying on second-hand evidence within the Vectos transport report. The figures for the previous Addison Lee use are taken from Brockton Capital's planning application. We cannot accept the reported Addison Lee vehicle movements as the premises were used solely for servicing of car taxis and small delivery vans, which we expect would have taken hours, not minutes, to complete for each vehicle.

The SEGRO / Vectos transport report suggests a route for larger heavy goods vehicles (HGVs) via Grafton Road and Queen's Crescent. The Kentish Town Planning Framework (map on page 74) illustrates all of Grafton Road as part of the 'London Cycle Network'. Camden's Cycle Action Plan, within the Transport Strategy, describes Grafton Road as part of Camden's Strategic Cycle Network and it is shown as a proposed cycle 'quietway' making this road unsuitable for heavy goods vehicles. The evolving 'Public Realm Vision for Queen's Crescent' would suggest that Queen's Crescent may not provide an appropriate vehicle route. The proposed change of use would also only add to early morning queues and congestion on Kentish Town Road whilst the clear intention of the Kentish Town Neighbourhood Plan and the Camden Climate Action Plan is to reduce and consolidate traffic.

For the reasons stated above The Kentish Town Neighbourhood Forum is not in a position to give its support to the proposed change of use at 3-6 Spring Place.

Following scheme revisions and re-consultation in August 2021, the KTNF provided the following response.

	<p><i>KTNF remains unconvinced that the Spring Place site is suitable for B8 storage or distribution use and have the following concerns</i></p> <ul style="list-style-type: none"><i>• Concentrated early morning HGV movements, 7 days per week, within this predominantly residential area which would also impact on a key part of Camden’s Strategic Cycle Network</i><i>• Segro present a subjective interpretation of the Kentish Town Planning Framework, incorrectly conflating Spring Place with policies around Regis Road and Murphy’s Yard, to justify the impact of anticipated vehicle movements on the wider road network</i><i>• Segro continue to reference insufficiently substantiated vehicle movement figures for the Addison Lee repair garage, as a precedent, which the local community refute. We understand that the figures are quoted third hand from a previous recent planning application.</i>
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<p>CAAC/Local groups comments:</p>	<p>Kentish Town Road Action (KTRA) – Object</p> <p><i>KTRA objects to the section of this Planning application that is concerned with change of use from Industrial (Class B2) to flexible industrial (Class B8)/storage or distribution.</i></p> <p><i>We are extremely concerned about the effect this proposal would have upon the already traffic-choked Kentish Town Road. The exit / entry at the junction of Holmes Road and Kentish Town Road is frequently jammed at the present time with traffic entering or leaving Holmes Road. One can only imagine how bad the situation will get should this application be approved. There will be queues of vehicles waiting to get to the proposed distribution centre via the narrow Holmes Road, and queues waiting to get out. Long lines of vehicles on Kentish Town Road will hold up traffic. In addition car-free Queen’s Crescent will force more traffic into Holmes Road. It’s a disaster waiting to happen.</i></p> <p><i>We are asking you to refuse this application as it stands.</i></p> <p>Following scheme revisions and re-consultation in August 2021, the KTRA provided the following response.</p> <p><i>Despite amendments to the planning application for Spring Place, and assurances from Segro, it is clear that Holmes Road and Grafton Road will suffer from even more traffic than proposed in the previous application.</i></p> <p><i>We are pleased that Queen’s Crescent will be able to continue holding its bi-weekly market, but this new variation is at the expense of Holmes Road where traffic even now is frequently snarled up leaving and entering the road to and from Kentish Town Road. The revised scheme will have a knock-on effect on Kentish Town Road itself where long lines of held-up traffic will ensue. The traffic situation will be disastrous for road users, residents and pedestrians. Segro states that the increase in traffic “will be negligible”. This is clearly untrue. If all the traffic that would have gone up and down Queen’s Crescent is proposed to travel up and down Holmes Road and Grafton Road, of course the increase will not be negligible! Another matter to consider is that the work to close the junction of Anglers Lane with Kentish Town Road is to start any time now. This will increase the traffic on Holmes Road / Kentish Town Road.</i></p>
	<p>Inkerman Area Residents Association - Object</p> <p><i>We are the Residents Association for the area to the south of, and including, Spring Place.</i></p> <p><i>We have met with representatives of Segro and, following that, have consulted our members through our email list, WhatsApp group and letters to institutions and residents of the streets that would be most affected by the proposed B8 use of this building.</i></p> <p><i>We now write to let you know that the response has been overwhelming in its opposition to this application. We have heard from a large number of our members and also from local schools and community organisations who are horrified by the idea of a change of use that would allow increased traffic in the area at a time when the majority of people are working towards a safer and cleaner road environment.</i></p>

We note from the comments already posted on the website that the Headteacher at St. Patricks Primary School, Mrs Savva Brown, and Marie Pierre Bouche on behalf of the parents association at CFBL are both expressing serious concern about the risk to the health and safety of their students were this application to be allowed. This is in addition to the literally hundreds of comments from school parents and local residents

SITE POTENTIAL USES

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 also acknowledge that last mile deliveries are needed, but there are many much more suitable sites, for example the nearby Regis Road industrial estate.

TRAFFIC

Any increase in traffic on already overloaded streets in a largely residential area is unacceptable. Whether or not the proposed traffic would be less than that generated by the previous occupants, Addison Lee (which is doubtful), we are reminded by a resident of Grafton Road that the Addison Lee repair centre operated only on weekdays and during normal working hours. In the four years since then, the world has also moved on and there are far greater concerns about pollution and road safety for cyclists and pedestrians.

Holmes Road itself is of particular concern as the junction with Kentish Town Road is already extremely dangerous for cyclists and pedestrians as traffic tries to get onto or off Kentish Town Road. There is no pedestrian crossing, there are parked cars and motorbikes and, frequently, traffic backing up. Additional HGVs and LGVs travelling in both directions along this route will exacerbate an already fraught situation.

We are aware that there are plans to partly pedestrianise Queens Crescent, which Segro propose as a main route for their traffic (the street is, of course, already partly closed for the market two days a week). In addition, there will be further consultations about reducing traffic in Holmes Road, and improving cycle lanes in Grafton Road.

Again, both these roads are identified by Segro as main routes for their vehicles, despite the existing restrictions on traffic in Grafton Road for parts of the day, and the narrow access point by Kiln Place.

Spring Place itself is often full of parked Veolia vehicles and clearly unsuitable for any additional traffic. We also note with concern the transport statement in the application which suggests a number of new access points.

"As a result of the redevelopment of the area, a number of improved connections are suggested such as the new access points via Gordon House Road, York Mews, Holmes Road, Spring Place, Arctic Street and Kentish Town City Farm. Additional access points in the area will open up the road network and could provide easier connections to and from the site."

If the suggestion is that more roads are opened up to more HGVs and other traffic, this is equally unacceptable.

The Camden Local Plan 2017 states that Camden "will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network." It also states "Major developments dependent upon large goods vehicles will also be resisted in predominantly residential areas."

CHILDREN AND YOUNG PEOPLE

Spring Place itself is heavily used by schools escorting large groups of children to and from sports activities at the Dome and Hampstead Heath. Similarly, all the local streets are busy with children going to and from schools and nurseries, and school groups going to the Kentish Town Sports Centre. With staggered start and finish times there can be children around at any time, so suggestions by Segro that traffic would be avoided during certain times of the day do not in fact answer this issue.

In addition, every summer the Stay Club student accommodation in Holmes Road hosts young language students who move around in very large (up to 100) groups at various times of the day.

Segro's proposed transport routes for HGVs go directly past 3 schools, nurseries (including one on the very sharp corner of Queens Crescent and Gillies Street, just north of the site and on Segro's route), a busy market, a library, sports centres and the West Kentish Town Estate (one of the most deprived areas of Kentish Town). They also pass very close to a GP practice and three community centres.

The scheme for a depot poses a direct threat to the health and safety of children.

NOISE AND POLLUTION ISSUES

The application is for 24 hour working, 7 days a week. 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. We have evidence from neighbours of existing commercial premises in the area that the noise of vehicle reversing and turning even in normal working hours is intrusive and distracting. The application states that external loading will not be permitted between the hours of 12 am and 5 am, which means that HGVs can be arriving, departing and unloading from 5 am until midnight. This may well conflict with Camden's framework hours and in any event is unacceptable in terms of noise, particularly given that numerous studies have linked noise pollution and low-level noise nuisance with physical and mental health problems, including depression and cardio-vascular disease. It may not have been apparent to those planning this development that the next building to the north is in fact a block of flats which includes families. Further up Spring Place on both sides of the road there is dense family residential accommodation.

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."

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.

Following scheme revisions and re-consultation in August 2021, the KTRA provided the following response.

We note the amendments proposed by Segro in their letter of 6 August 2021. These amendments fail to address the fundamental problem with this application – namely, that this site is totally unsuitable for use as a delivery depot.

Traffic

We applaud the fact that Camden is taking seriously the environmental damage caused by road traffic, and have already introduced a range of traffic calming measures in the borough. These include Healthy Streets, healthy school streets, roads closed except for access and the creation of bike lanes. We note from recent meetings with Traffic officers that plans for some similar treatments for Holmes Road and Grafton Road are underway, and we warmly welcome further consultation on this.

In this context, it is a nonsense to consider siting a depot in Spring Place, with routing for HGVs now directed exclusively along these two heavily overloaded roads. Routing for smaller delivery vehicles is hardly discussed in the application, and will inevitably mean that LGVs, vans and motorbikes will be using all the smaller residential streets in the area, which goes directly against the Council's attempts both to reduce road traffic and to shift what remains onto main roads.

The applicant states repeatedly that the development would generate negligible amounts of traffic on Holmes Road. Even the projected figures are far from negligible, and there is absolutely no certainty that these figures are realistic.

If it were true that the amount of generated traffic would be negligible, it would make a nonsense for any commercial enterprise to have a depot there at all.

The applicant also comes back to the argument that the number of vehicular movements generated by Addison Lee during the last active use of the building was greater. The figures quoted are widely disputed and in any event reflect access by cars, not HGVs and LGVs.

Safety

The amended application completely fails to address the point repeatedly made by residents and schools that movement by children from both St. Patricks and CFBL is not restricted to school start and finish times. There are staggered hours for the youngest children, and frequent movements

along Holmes Road, Grafton Road, Willes Road and Spring Place itself – all of which provide access to local sports facilities which timetable activities for children throughout the day. Holmes Road also hosts accommodation for vulnerable adults and students and is a major route for pedestrians from West Kentish Town to Kentish Town Road.

Enforcement

Segro is the developer of this site, and will not be the user. They continue to maintain that conditions can be put in place which will bind any future users of the site, yet they suggest only an annual compliance audit. Whatever conditions are put in place for a future user of the site in a Delivery and Servicing Management Plan (DSMP), there is a huge question about enforcement. The user could be a company running its own fleet, or using drivers using their own vehicles. Whatever is agreed in the DSMP may turn out to be notional – or at best take months by Camden's overstretched enforcement department in the council to address any breaches.

Association CFBL Parents - object

The Association CFBL Parents, which represents the 450 families and 700 children from 3 to 14 years old who attend the CFBL, is strongly opposed to this project (Application number: 2020/5913/P).

Indeed, the entire neighbourhood is made up of small streets that will become congested at all hours of the day and night, causing increased danger for parents and children attending the school (from 8:00 to 17:00 and from 8:00 to 12:00 on Wednesday) and traffic jams.

In addition, the general level of pollution (noise, visual and air pollution) will consequently increase significantly and is likely to affect not only our pupils but also the pupils of St Patrick's and the whole neighbourhood.

We so strongly object to this planning application.

Following scheme revisions and re-consultation in August 2021, the CFBL Parent's community provided the following response.

We believe that this will still result in increased traffic in the local vicinity of the school, resulting in increased air and noise pollution, lack of space on pavements, risk of collusion with children walking/cycling to school and worsening Camden's environmental footprint.

We already experienced the impact on our children and parents school run when a student accommodation (Stay House) was built on Holmes Road recently, which is now housing Gorrilla premises.

The effect will undoubtedly be worse on pregnant women and young children and disabled people.

Collège Français Bilingue de Londres (CFBL) – object

College Francais Bilingue de Londres (CFBL) is a primary and secondary school with nearly 700 pupils from 3 to 14 years old. As a large number of pupils come on foot or via public transport, we are extremely concerned about this planning application. In particular, we think that B8 use (storage and distribution) is not suitable for this site due to the close proximity to our school, and to St Patrick's School further up Homes Road.

We would therefore like to object to the planning application for the following reasons:

Safety of our children

The scheme for a depot poses a direct threat to the health and safety of children. Government guidance states that 'planning policies and proposals may need to have particular regard to [...] proximity to locations where children and young people congregate such as schools, community centres and playgrounds'. Other sites ought to be more appropriate for the use of the site proposed by the applicant. The Regis Road industrial site just a few hundred meters away seems a much better and less risky option which would not endanger children's lives.

The applicant's risk mitigation strategy is completely insufficient. In particular, the proposal to have a very time limited restriction on certain routes during peak school times, i.e. 0830-0900 and 1500-1530 hours, does not reflect our times (e.g. arrival of children from 0800, end time at 1200 on Wednesdays, walks to local sports centre, etc.) It also ignores the reality of the existing staggered start times and nursery times.

Traffic

Holmes Road is already overloaded and Grafton Road is generally busy for a residential street. Adding HGVs and van traffic on these roads is particularly unwelcome.

Enforcement

Even assuming that Segro would have stricter times to comply with, we are extremely worried about how any condition would be enforced by Segro and ultimately by the Council.

Conclusion

In summary, we would like to strongly object to this planning application.

We trust that the Council will give enough weight to the health and safety risk that this application would introduce.

Following scheme revisions and re-consultation in August 2021, the Headteacher of CFBL provided the following response.

We believe that the applicant's revised proposal not only does not address our concerns but is increasing the risks to the health and safety of CFBL's pupils and staff. We therefore strongly object to the revised planning application for the following reasons:

Safety of our children: The revised scheme contemplates routing all vehicles from and to the site through Grafton Road and Holmes Road, and not use Queen's Crescent any longer. Therefore, the safety of our pupils, staff and community is put at even greater danger under the revised proposal.

As you may know, our school is located at the crossroad of Willes Road and Holmes Road, with gates on both roads and also on Cathcart Road. Many pupils, staff and parents are using Holmes Road and Grafton Road either to walk to/from the school or to reach public transportation. We do not agree that any 7.5-18t on roads where schools are located, especially when it comes in addition to the already heavy traffic, can and should in any way be considered and treated as negligible as mentioned in the applicant's revised proposal.

The applicant's risk mitigation strategy is completely insufficient. In particular, the proposal to have a very time limited restriction on certain routes during peak school times, i.e. 0800-0945 and 1515-1615 hours, does not reflect our school's operations (e.g. end time at 1200 on Wednesdays, walks to local sports centre, school trips etc). It also ignores the reality of the existing staggered start times and nursery times.

Even assuming that Segro would have stricter times to comply with, we are extremely worried about how any condition would be enforced by Segro and ultimately by the Council.

Health: The scheme is in direct conflict with the healthy street schemes

policy promoted by Camden (walk to school scheme, healthy streets, cycle to school schemes ...).

In addition, under current COVID regulations, schools are requested to increase ventilation. The additional traffic of HGVs and vans will increase the air and noise pollution on the roads, at a time where schools need to open windows to allow natural ventilation. Children and staff from CFBL but also from St Patrick will therefore be submitted to an increased air and noise pollution, putting their health at risk.

As raised in our previous letter, government guidance states that 'planning policies and proposals may need to have particular regard to [...] proximity to locations where children and young people congregate such as schools, community centres and playgrounds'. Other sites ought to be more appropriate for the use of the site proposed by the applicant. The Regis Road industrial site just a few hundred meters away seems a much better and less risky option which would not endanger children's lives.

For the reasons raised in this letter and in our letter of 1 February, we strongly object to this planning application. We trust that the Council will give enough weight to the health and safety risk that this application would introduce.

Kentish Town City Farm – object

I am objecting to the proposed scheme on behalf of Kentish Town City Farm. I am a Trustee there and Chair of the Board of Trustees. The farm was the UK's very first city farm established in 1972 and served three generations of locals. We have 32,000 visitors to the farm every year and most of those are local families. We anticipate that number increasing significantly as the farm focuses its services on addressing the coming post covid mental health crisis. We want to encourage all our visitors to use sustainable forms of transport to reach us so we are deeply concerned that a 24 hour operation of truck traffic will make the roads close to the farm unsafe for children on bicycles and on foot when crossing the road especially at the junctions of Holmes/Spring, Holmes/Grafton Road and Gilles/Grafton Road are already hazardous. As a local I still have a vivid memory of a child on a bike being hit and badly injured by a van under the railway bridge on Grafton Road. Courier vans from the close by depot for UPS already cause great problems at these particular junctions as do all the Council Depot vehicles that regularly block Spring Place directly by the proposed entrance to this development. You mention our farm in your application. There is no suggested access route from/to the farm from Spring Place so that is inaccurate information. It seems to have been stated as 'fact' here.

Camden Cycling Campaign – object

*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 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*

	<p><i>applicant, it is hard to envisage any arrangements for monitoring and compliance enforcement that could be effective.</i></p> <p><i>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.</i></p> <p><i>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.</i></p>
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Eton CAAC – No objection

Councillor Jenny Headlam-Wells - object

I am writing as the Ward Councillor in Kentish Town in support of my residents' objections to this planning application. I have been the Ward Councillor since 2010 and am consequently familiar with Camden's planning policies and the objectives and policies of the Kentish Town Neighbourhood Forum.

The application is from SEGRO, a property investment company operating as a Real Estate Investment Trust (REIT). 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 our Kentish Town community. Their use of a planning agent, 'Iceni Projects', to further this application underlines their 'arms-length approach to the neighbourhood. Furthermore, while SEGRO are the owners of the premises, they are not the end-users. This will make the enforcement of commitments made in the planning application difficult for Camden to monitor and police. Indeed, as they point out in section 15 under Own Driver Franchise Model, 'As the end occupier of the site is not known at this stage, it is difficult to predict the final model the future occupier will use and exactly when vehicles will arrive to and depart from the site'. This demonstrates a complete lack of awareness and concern for the current road traffic problems in the host neighbourhood.

This application contains objections from an unprecedented number of residents and community forums. I have read them all with interest. In summary, the objections are:

First, to the increased volume of traffic along Holmes Road, Willes Road and Grafton Road, and the consequent pollution. For example, the plan in Table 2 shows 92 vehicle transits daily, including ten servicing vehicles of up to eighteen tons. Eighteen HGV trips per day are proposed. Yet the level of traffic generated is described as 'negligible'. This flies in the face of the policies of Camden Council and the Mayor of London.

Second, the objections concern the negative impact on the health and safety of the community. There are two schools on Holmes Road and the pupils will be adversely affected by pollution and risks of road traffic accidents. Camden Council and the Kentish Town Ward Councillors are currently considering the introduction of a Healthy School Street in Holmes Road: this application is totally inconsistent with this policy and further demonstrates the lack of concern for the community's schoolchildren and their parents.

Third, on the economic side, the promise to deliver employment opportunities is unconvincing. Jobs in the 'last mile' delivery sector are known to be low-paid, ad hoc in nature, and without employment rights. This is unlikely to make a positive contribution to the local economy.

Fourthly, objections highlight the issue that I raised at the opening of my letter: the fact that SEGRO are the owners of these premises, but not the end-users and will thereby ultimately have no role or responsibility in contributing to the local community. This is in direct opposition to one of the key strategic objectives of Camden's Plan of 'securing safe, socially mixed

	<p><i>and balanced areas with strong, cohesive and resilient communities'.</i></p> <p><i>As Kentish Town Ward Councillor I support my residents in their objections to this application and request that it should be rejected in its entirety.</i></p>
	<p>Cllr Georgia Gould, Cllr Jenny Headlam-Wells, Cllr Meric Apak – object</p> <p><i>We are writing as Ward Councillors for Kentish Town to object to the proposals made by Segro for the Spring Place site. Following discussion with residents, we have deep concerns about the impact this proposal will have on surrounding communities and Kentish Town. Spring Place is unsuitable for this type of use, and Segro have failed to adequately respond to the concerns of residents about the impact of heavy goods vehicles and onward delivery vehicles on surrounding residential streets, schools and traffic routes. The proposed route for the Spring Place site places significant weight on Holmes Road for through traffic at the same time as Holmes Road is being proposed for traffic reduction by the Council. We have concerns that Segro have not accounted for this change and that their proposals combined with the Council's commitment to reducing traffic on critical residential roads will result in increased congestion on unsuitable routes.</i></p> <p><i>We are also disappointed at the level of ambition the Segro sites demonstrate for the use of electric vehicles – only 25% within 3 years. Alongside the unsuitability of the routes through residential and community areas, the lack of an ambitious approach to reducing emissions and air quality means that we believe that the plans that Segro have put forward are inappropriate. For these reasons we would urge planners to reject these proposals.</i></p>

Site Description

The site is currently occupied by a predominately single storey building which is located within a mixed industrial and residential area approximately 400 metres to the west of Kentish Town 'Town Centre'. The Regis Road industrial area is to the northeast of the site. To the south and west of Regis Road's industrial and warehousing uses, the area is largely residential. The site is bound to the north by no.7 Spring place, a part-6 part-7 storey residential building containing 21 flats; to the east by Spring Place and the Veolia Council depot site; to the south by a series of 2-storey warehouses and office buildings (including the Autograph building) that wrap around the corner of Spring Place; and to the west by the backs of properties which front onto Grafton Road. The site is bisected through the middle by the London Overground rail line which runs from north to south. The rail line is designated as a Green Corridor.

The site falls within the Kentish Town Neighbourhood Plan (KTNP) area. The site is not within a conservation area but the Inkerman Conservation Area is approximately 40m to the south. A corner of the Regis Road Growth Area is opposite the site on the north side of Spring Place. The site also falls into the area covered by the Kentish Town Planning Framework.

Relevant History

Application site

2018/2592/P: Variation of condition 2 (approved plans) of planning permission 2016/5181/P dated 21/12/2017 (for erection of a part-six and part-two storey building comprising office (Class B1) at ground and upper floors; cafe (Class A3) and flexible event space (Sui Generis) at ground floor and associated works) namely, to allow reduction in size of basement, layout changes at ground floor, the relocation of plant at 5th floor and 2nd floor roof level and façade changes including the replacement of metalwork with brick on part of west elevation and removal of fins from windows at ground and 5th floor level of east elevation and removal of perforated metal panel to expose windows of east elevation and other external alterations. Withdrawn following resolution to grant

2016/5181/P: Erection of a part-six and part-two storey (above single basement level) building comprising Office (Class B1) at ground and upper floors; Cafe (Class A3) and flexible event space (Sui Generis) at ground floor and associated works following demolition of existing two-storey industrial (Class B2) building. Granted Subject to a Section 106 Legal Agreement 10/01/2018

Arches 77-82, Spring Place, (also known as 3-7 Spring Place, NW5)

PE9606133: Alterations to front elevation including new fire emergency doors, new industrial doors in existing openings, new access door and metal fascia. Granted 11/02/1997

7 Spring Place

PEX0000686: The erection of a 6 storey building to accommodate 4 x 1 bedroom flats, 6 x 2 bedrooms and 2 x 3 bedrooms and 12 parking spaces on the ground floor. Refused 28/11/2000 Appeal allowed 12/03/2001 (appeal reference: APP/X5210/A/00/1052256)

The above application involved the loss of a scaffold storage yard (an employment use). This application was subject to an appeal against non-determination (public inquiry). The Council's statement of case advised that if the application had been determined it would have been refused and one of the reasons for refusal would have been the loss of an employment site.

The inspector therefore considered whether the proposal would result in a harmful loss of a site which could provide industrial or storage accommodation. The inspector placed significant weight on the value of the site for housing and considered this could only be outweighed by compelling arguments to support its retention for employment use.

Among other considerations, the inspector found the following:

10. The site is set within a network of relatively narrow streets of which Spring Place is typical. They are linked by tight junctions that are difficult to negotiate particularly by large vehicles. Parking on both sides of Spring Place also restricts vehicle movement to single file along much of its length. Having regard to these difficulties, and notwithstanding the presence of some long-standing commercial and industrial uses in the area, I consider that local road conditions do not favour perpetuation of the current commercial use.

Land on the corner of Arctic Street and Spring Place

9501761: Redevelopment of the industrial/storage site to provide 15 flats for social housing, 9 houses for low cost home ownership and 2 workshops under the arches. Refused 05/09/1996 Appeal dismissed 25/02/1997 (appeal reference: APP/X5210/A/96/268242/P5)

The inspector dismissed this appeal. However their comments on the accessibility of Spring Place and the surrounding streets have some relevance to the current application.

11. That being so, I turn to the criteria and first, to accessibility. The site is set within a network of relatively narrow streets, many of which are congested by parked vehicles, and which include a number of junctions, including that of Spring Place and Holmes Road, which larger vehicles would find difficult to negotiate. I accept that its proximity to a residential area and public transport links is compatible with those policies, at all levels, which seek to link housing and employment more closely and to reduce dependence on the car. I also have no reason to question the Council's evidence from surveys of other sites that deliveries by large (15m in length) vehicles are minimal, but the possibility cannot be excluded and it is not a matter over which a user of the site would necessarily have control. In my opinion, even commercial vehicles of smaller dimensions would be an unwelcome presence in these streets and I would be concerned about any proposal which could perpetuate or increase such movements.

P9603167: Redevelopment of the industrial/storage site to provide 10 x 3-bedroom houses and 15 x one-bedroom flats for social housing and two studio workshops (Class B1c) under the arches (amendment to proposals in respect of bin stores only). Granted 03/07/2003

Other Planning Decision referred to in the Assessment, below

96A Clifton Hill (City of Westminster)

21/04115/FULL: Use of ground and first floor as Storage and Distribution (Use Class B8). Refused 20/08/2021

Reasons for refusal:

1. The proposed use of this part of the building as a fast grocery delivery service (Class B8: storage and distribution) would due to its operation, its hours of opening, the activity associated with the high number of delivery trips, is considered to be an un-neighbourly form of development, resulting in a material loss of residential amenity to nearby residents as a result in undue noise and disturbance and also affect the adjacent public house. It is also considered that the use fails to preserve the character of this part of the St John's Wood Conservation Area. This would be contrary to Policies 7, 33, 38 C and 39 of Westminster's adopted City Plan (2021).
2. It is considered that insufficient information has been submitted to clearly demonstrate how the

shared alleyway can accommodate all the activities associated with this Class B8 use, refuse arrangements and the revised number of deliveries using smaller 3.5 T vehicles. As such, at this stage, the City Council is not convinced that the use can operate without an adverse impact and comply with the Council's transportation and amenity policies as set out in 7, 29, 33, 37 and 38C of the Westminster City Plan adopted April 2021.

Land at rear of 115-119 Finchley Road (Deliveroo)

EN17/1005: Appeal reference **APP/X5210/C/18/3206954**; Appeal Allowed and Enforcement notice quashed. Planning permission is granted on the application deemed to have been made under section 177(5) of the Act as amended for the development already carried out, namely the use of the land and buildings at the rear of 115-119 Finchley Road (lower ground floor), London NW3 6HY, referred to in the notice, for commercial kitchens and delivery centre (sui generis) and the installation of external plant to facilitate that use including three (3) extract ducts, four (4) flues, three (3) air intake louvres and three (3) air condenser units, subject to the following conditions:

1. The use hereby permitted shall be for a limited period being the period of 14 months from the date of this decision. The use hereby permitted shall cease on or before that date and all external plant and equipment facilitating the use shall be removed from the site no later than 15 months after the date of this decision.

There were a further 10 conditions including:

3. Deliveries from the premises to customers shall be carried out by foot, bicycle or electric two wheeled vehicle only and not by any other mode of transport.
4. No deliveries from the premises to customers shall be carried out outside the following times: 1200 to 2300 hours.
10. No deliveries shall be taken at or despatched from the premises and no loading or unloading of goods from servicing vehicles shall take place outside the hours of 0800 to 1600 Monday to Saturday. No servicing/deliveries shall take place on Sundays or on Bank or Public Holidays.

2020/2367/P: Use of the site as commercial kitchens and delivery centre (Sui Generis use) on a permanent basis, installation of external plant equipment including 3 extract ducts, 4 flues, 3 air condensers, 3 air intake louvres and vents, creation of e-bike and cycle parking, e-bike charging point, bin store and 1 parking space (RETROSPECTIVE). Granted 03/03/2021

The above planning permission was granted subject to 14 conditions including condition 1.

1. The use hereby permitted shall be for a limited period being the period of 9 months from the date of this decision. The use hereby permitted shall cease on or before that date and all external plant and equipment facilitating the use shall be removed from the site no later than 10 months after the date of this decision.

Relevant policies

NPPF 2021

London Plan 2021

GG3 Creating a healthy city

GG5 Growing a good economy

Policy D4 Delivering good design

Policy D3 Optimising site capacity through the design-led approach

Policy D14 Noise

Policy E4 Land for industry, logistics and services to support London's economic function

Policy G6 Biodiversity and access to nature

Policy SI 1 Improving air quality

Policy SI 2 Minimising greenhouse gas emissions

Policy SI 13 Sustainable drainage
Policy T2 Healthy Streets
Policy T4 Assessing and mitigating transport impacts
Policy T7 Deliveries, servicing and construction

Camden Local Plan 2017

Policy G1 Delivery and location of growth
Policy C1 Health and wellbeing
Policy C5 Safety and security
Policy C6 Access for all
Policy A1 Managing the impact of development
Policy A3 Biodiversity
Policy A4 Noise and vibration
Policy A5 Basements
Policy D1 Design
Policy D2 Heritage
Policy E1 Economic development
Policy E2 Employment premises and sites
Policy CC1 Climate change mitigation
Policy CC2 Adapting to climate change
Policy CC3 Water and flooding
Policy CC4 Air quality
Policy CC5 Waste
Policy T1 Prioritising walking, cycling and public transport
Policy T2 Parking and car-free development
Policy T4 Sustainable movement of goods and materials
Policy DM1 Delivery and monitoring

Kentish Town Neighbourhood Plan 2016

Design Policy D3: Design principles
Green & Open Spaces Policy GO3: Biodiverse habitats
Policy SSP6: Veolia Council Depot Site
Policy SP2: Kentish Town Potential Development Area (KTPDA) - Regis Road Site
Policy SP2a: KTPDA – General Development Criteria

Camden Planning Guidance

Design (January 2021)
Amenity (January 2021)
Transport (January 2021)
Access for all (March 2019)
Energy efficiency and adaptation CPG (January 2021)
Biodiversity (March 2018)
Employment sites and business premises (January 2021)
Air Quality (January 2021)
Water and flooding (March 2019)
Developer contributions (March 2019)

Kentish Town Planning Framework (2020)

Assessment

1. Proposal

- 1.1. The application seeks approval for a change of use at the site for 1,756sqm of industrial floorspace (Class B2) to flexible use as either industrial (Class B2) or storage / distribution (Class B8) or light industrial (Class E). The proposed development involves the refurbishment of the existing building including the replacement of the roof. The following alterations are also sought:
- installation of PV panels at roof level;
 - installation of wood cladding to parts of the Grafton Road and Spring Place elevation;
 - installation of a living wall and alterations to the entrance on the Grafton Road elevation.
 - The 3 existing loading doors at the southern end of the Spring Place elevation would be replaced by 2 wider loading doors, which would be 10m in width. The existing loading door to the northern end of the Spring Place elevation would also be widened to 6.4m.
- 1.2. Although the application form states the floorspace would be 1,756sqm, the floorspace quoted in the Transport Assessment (TA) is c.1900sqm. The Design and Access Statement refers to 22,000 sqft which is 2043sqm. Officers have measured the ground floor which has a floorspace of approximately 1875sqm. This figure aligns with the floorspace in the TA and so the following assessment will be based on the c.1900sqm floorspace figure set out in the applicant's TA.
- 1.3. Revision
- 1.4. The proposal has been revised to reconfigure and widen the existing loading doors, to allow all servicing to be undertaken off-street. An updated routing strategy for goods vehicles has also been provided. This omits Queen's crescent from the servicing vehicle routing strategy. All relevant documents have been updated to incorporate the amended scheme.

2. Assessment

- 2.1. The principal considerations material to the determination of this application are:

- Land Use
- Transport
- Amenity
- Air quality
- Design
- Energy and sustainability
- Sustainable drainage
- Nature conservation
- Employment and training planning obligations

2.2. Land Use

- 2.3. The site is currently vacant but comprises circa 1,900sqm of B2 industrial floorspace that was previously used by Addison Lee for the service and repair of their cars. The previous approval for the redevelopment of the site (planning ref: 2016/5181/P) considered the use by Addison Lee to fall within the General Industrial B2 Use Class, which accords with the planning history for the site. The applicant for planning ref: PE9606133 granted 1997 was JT Coachworks and the application form describes the floorspace at 3-7 Spring Place as 'industrial'. Historically, part of the site was in use as a glassworks and there is evidence that the site was later used as a coachworks.

- 2.4. Policy E1 of the Local Plan sets out that “the Council will continue to protect industrial and warehousing sites and premises that are suitable and viable for continued use”, given the scarcity and price of existing sites within the borough, and their importance to Camden’s economy and the functioning of the CAZ. Therefore the refurbishment of the existing building is welcomed given the long period of vacancy and the potential to bring employment use back to the site. Given the recent use class changes, the flexibility of Class E would mean that the site could be used for any of the permitted uses within Class E. However, not all of the uses within Class E would be appropriate for this location as set out below.
- 2.5. The use of this large site for retail (Class E(a)), restaurant (Class E(b)), or financial and professional services for visiting members of the public (Class E(c)) would not accord with Policy TC1. Town centres uses should be located in designated growth areas and existing centres and only if suitable sites cannot be found within designated centres will the Council consider edge of centre locations or if no edge of centre locations are available, out of centre locations. Likewise, the use of the site for indoor sport, recreation or fitness (Class E(d)), medical or health services (Class E(e)), or a crèche (Class E(f)) would be most appropriate in a town centre. The Council would need to assess the potential accessibility of a new community or leisure facility (within Class E) for its intended users. The scale and intensity of use of some community facilities can lead to adverse impacts on residential amenity. This is principally related to the movement of large numbers of people at certain times of day, impacts such as noise and air pollution and the pressure on the transport system. In the absence of a transport assessment to support these potential community / leisure uses within Class E and the lack of policy support for retail, restaurant or financial and professional services in this location, a condition would be required to restrict the use of the site to office use only ‘Class E(g)’ should the application be recommended for approval.
- 2.6. There are concerns that this location is unsuitable for the creation of storage / distribution floorspace (Class B8) and particularly the use of the property as a 24 hour ‘last mile’ distribution depot due to the transport and amenity impacts.
- 2.7. The site falls within an area covered by the Kentish Town Planning Framework which sets out the spatial strategy for this area and states that “high frequency serviced industry uses will form an important part of redevelopment proposals and should be located where they can be most readily accessed and where they minimise the impact on the character of the neighbourhood and the wider road network.”
- 2.8. An Access Study prepared by Velocity formed part of the evidence base for the Kentish Town Planning Framework (KTPF). This is a technical study focussed on transport considerations which assessed vehicle access in the KTPF area. Spring Place is described as providing local access in a generally residential area. The report finds that Spring Place is not considered suitable for high volumes of HGVs.

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Spring Place

- Spring Place provides local access with on street parking. The area is generally residential and is home to the French Language School. It is not considered suitable for high volumes of HGVs.
- Articulated lorries would struggle to access from the strategic road network.

- 2.9. The Access Study confirms that Spring Place is accessed from more local streets and therefore could support limited levels of low traffic generating development and should primarily be designed for pedestrian and cyclist access. Spring Place could provide limited vehicular access to essential car and van servicing for low traffic generating land uses.
- 2.10. The KTPF sets out land use character areas and Spring Place is in the light industry and housing mixed use area. The location of Spring Studios, a world-class film and photographic studio, on Spring Place, gives rise to this area being identified as a basis for growing the existing cluster of creative, cultural and tech industries - a key ambition of the framework. Within the framework area there are two principle development areas: Regis Road Growth Area and Murphy’s Yard. These development areas would be better suited for

a 'last mile' depot given their accessibility to the strategic road network. Likewise, Policy E4 D of the London Plan states that retention, enhancement and provision of additional industrial capacity should be prioritised in locations that are accessible to the strategic road network. Contrary to this, the site for the proposed distribution use is located within a network of local roads and access to the strategic road network is a significant distance from the site.

2.11. The supporting text for Policy A1 states that major developments dependent upon large goods vehicle deliveries will be resisted in predominantly residential areas. Although the immediate context of the site is a mixed residential and industrial / commercial area, it is evident that deliveries to the site would have to pass on local roads in predominantly residential areas. For these reasons, alongside the amenity and transport impacts of the development which are discussed below, the site is not considered suitable for a storage / distribution use.

2.12. **Transport**

2.13. The Council will resist development that fails to adequately assess and address transport impacts affecting communities, occupiers, neighbours and the existing transport network (Policy A1). A Transport Assessment (TA) has been submitted which addresses trip generation and the effect of development.

2.14. Owner driver franchisees

2.15. While the applicant has highlighted the potential use of the site as a 24hour last mile distribution depot, the actual model of operation is unspecified because the end occupier of the site is not known at this stage. However, some of the operators in the local delivery market sector; including DPD (which is quoted in the TA), use self-employed owner driver franchisees (ODFs). Within this arrangement, delivery drivers own their vehicles. In these circumstances it is considered unlikely that owner drivers would be prepared to leave their vehicles on site overnight and they would be more likely to drive them home. This would lead to an increase in car commuting which would be contrary to the spirit of the Council's transport policies, in particular Policy T2.

2.16. Trip generation

2.17. The applicant's Transport Assessment (TA) provides details of the trip generation associated with the previous use (Addison Lee). A summary of Addison Lee's trip generation is set out below.

Trip Type	Daily		
	In	Out	Total
Past Use – Addison Lee			
Cars	156	158	314
LGVs	21	19	40
HGVs	6	6	12
Total	183	183	366

2.18. There is no evidence that Addison Lee operated 7 days a week, so the proposed use would likely result in an increase in trips at the weekend as compared to the previous use.

2.19. The TA uses data 'extracted from relevant planning applications and information provided by the Applicant' to assess vehicle movements generated by the proposal. The three chosen sites are listed below.

- DPD, Hyde Park, Westminster – 780sqm.

- DPD, Vandon Street, Westminster – 465sqm; and,
- Royal Mail Depot, Poplar, Tower Hamlets – 2,000sqm.

2.20. The average trip rate of the above three sites has been used by the applicant to derive an estimate of 92 two way trips for the proposed Class B8 last mile depot, split between 14 two-way car movements, 68 two-way LGV movements and 10 two-way HGV movements. The estimated vehicle movements are shown in Table 5.8 of the TA which is reproduced below.

Table 5.8: Vehicle Trip Generation for 1,914sqm of B8/Last Mile use

Mode	Daily		
	In	Out	Total
Cars	7	7	14
LGVs	34	34	68
HGVs	5	5	10
Total	46	46	92

2.21. There are doubts over the comparability of the smaller sites to the application site, as sites that are one third or one quarter of the size of the development site would be less likely to attract HGVs. The Royal Mail Depot is similar to the development proposal in terms of area. According to the data provided, the site is fed by six 7.5t vehicles that arrive between the hours of 04:30 and 08:30. The trip generation is shown in Table 5.6, reproduced below.

Table 5.6: Daily Royal Mail Poplar Vehicle Trip Generation (2,000sqm)

Mode	Daily		
	In	Out	Total
Cars	26	26	52
LGVs	23	23	46
HGVs	6	6	12
Total	55	55	110

2.22. Whilst providing a better comparison, officers cannot be sure that the Royal Mail Depot has captured the worst-case scenario. Firstly, it has an incoming arrival schedule (04:30 and 08:30) that is tied into Royal Mail's morning delivery schedule. Not all logistics operators are focused on morning deliveries and the application site could receive incoming supplies throughout the day. Secondly, it is noted that the independently calibrated TRICS data suggests approximately double the number of HGVs would arrive.

2.23. Given the issues set out above, officers remain concerned that the TA's calculation of trip generation for the last mile use is not sufficiently robust and may underestimate future vehicle movements. In addition, no sensitivity testing has been done to investigate what the potential number of vehicle trips would be if the full capacity of the last mile distribution centre was used throughout an extended day (07:00 to 23:59) assuming each vehicle is used constantly throughout the day. This would have provided a worst-case scenario which is fundamental to the full understanding of transport impacts when the future operator of the site is unknown. It is also recognised that B8 distribution use is currently an evolving area. The applicant's submission (B8 Last Mile Use Information Note) provides information on companies and sectors which have an interest in 'last mile delivery' inside urban locations. These include the following:

MAIL AND PARCELS	ONLINE GROCERY	FINAL MILE DELIVERY	RETAIL DELIVERY	PHARMACEUTICALS DELIVERY
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- 2.24. The Trip generation provided by the applicant is based on two DPD last mile distribution depots and a traditional parcel / mail delivery operation (Royal Mail). The applicant's submission highlights that *"the building has been designed to allow for multiple operational approaches depending on the individual occupants in the future. By designing with flexibility built in, SEGRO has enabled a site that can be operated in multiple ways, allowing for more flexibility and operational efficiency than a set operating procedure"*. Given the proposed development's flexibility and the 24-hour use sought, the future operator could be a company or sector which is neither traditional mail / parcels nor last mile distribution.
- 2.25. It is unclear how the trip generation would vary for the other types of operation shown in the table above. On demand grocery deliveries such as those provided by 'Gorillas', 'Farmdrop', 'Weezy' 'Getir' and 'Amazon Fresh' appear to be a growing sector. Planning permission was recently refused for a storage distribution use operated by Getir in the City of Westminster (see planning history). This application involved a fast delivery service of groceries direct to homes between the hours of 8am and midnight, 7 days a week. The Transport Statement supporting the Getir application indicated that there could be upwards of 1,000 extra movements a day of mopeds picking deliveries up from the site and returning, which equates to some 30-40 in and 30-40 out every hour (one movement every minute).
- 2.26. For this application (Spring Place), as the future operator of the site is not known, granting permission for a B8 use could potentially allow the site to be used as a 'dark store' for home delivery services, such as those identified, with unknown transport impacts.
- 2.27. The DSMP suggests that an Operational Management Plans/Delivery and Servicing Management Plans could restrict the number of vehicles and this could be secured by condition or legal agreement. The DSMP states the development would be capped at 9 HGVs (18 two-way trips) per day and that this could be monitored through the processes outlined with the DSMP. The cap of 9 HGVs is "based on TRICS data presented in the submitted TA for Class E Industrial/B2 uses" (DSMP paragraph 4.5). However the TA notes that the TRICS database has limited information for Class B2/ Class E (light industrial) sites within greater London. Paragraph 5.11 of the TA states that:
- 2.28. "TRICS has a relatively small sample size of Class E (light industrial) and B2 and as such sites that are located within outer boroughs such as Hillingdon and Brent have been used. Vehicle use is often more intensive in locations such as these (outer London boroughs) and as such the below is considered robust."
- 2.29. The paragraph above relates to B2 Trip Generation table 5.1 and asserts that the trip generation figures for B2 use are robust. This is understood to mean that it provides an upper figure for trip generation which would be reflective of a worst case scenario. It is unclear why the worst case scenario for B2 use has been used to set the cap for HGV movements rather than the calculated 5 HGV movements for a B8 / last mile use based on the floorspace of Spring Place (as set out in Table 5.8 of the TA and reproduced above) or the 6 HGVs per day associated with the previous Addison Lee use.
- 2.30. A cap which restricts HGV movements to the worst case scenario for B2 use provides little reassurance to officers.
- 2.31. Impact of servicing on the surrounding network
- 2.32. The HGV Routing Strategy, to and from the site, is shown in Appendix D of the TA. The

strategy shows vehicles arriving via Holmes Road or Grafton Road, joining Spring Place south of the site. Vehicles would depart via Spring Place and Holmes Road or via Spring Place and Holmes Road and Grafton Road. Holmes Road and Grafton Road are classed as 'local streets' in Camden's road hierarchy. These streets have no bus routes and are not designed to act as routes between roads that are higher up the road hierarchy such as A Roads and B roads. Holmes Road is described as the primary route and Grafton Road as the secondary route in Appendix D but the TA does not provide a clear rationale for this designation or what this designation would mean in practice.

2.33. These HGV routes will be considered in turn.

2.34. *Holmes Road*

2.35. The TA appendix D illustrates the proposed routing strategy and includes a primary route via Holmes Road to the south east of the site. Holmes Road hosts two schools and has been and continues to be the subject of a significant volume of correspondence (unrelated to the current application) from local people and ward councillors in respect to the already high volumes of traffic on Holmes Road. The junction of Holmes Road and Kentish Town Road, which hosts high turning movements and has no controlled pedestrian crossing facility, is a KSI (killed or seriously injured) hotspot for cycle and pedestrian casualties. Please see map of volumes and KSIs below.



2.36. The Council are looking to make Holmes Road a Healthy School Street. The Healthy School Street scheme is yet to be finalised but it is likely that the road will be closed to motor traffic between 0800 and 0915 and between 1500 and 1630 on Monday to Friday during school term. These hours may vary once the Council fully understands the specific requirements of the schools. Once implemented, any vehicles associated with the Spring Place site would be unable to use Holmes Road as a route to or from the site during the morning and afternoon restricted periods. Such vehicles would need to use Grafton Road during these periods.

2.37. SEGRO has committed within the DSMP to restrict servicing vehicles (7.5t -18t) travelling on Holmes Road between the hours 0800-0945 and 1515-1615 to avoid school times. However, the Collège Français Bilingue de Londres (CFBL) operates staggered opening times. The school has 698 pupils (45 early years; 340 primary; and 313 secondary). While the nursery and primary have drop off between 8am and 8:45am, pupils in the secondary school arrive at various times as lessons can start between 8:30am and 10:15am. The

secondary pupils also leave at various times as their school day may finish anytime between 1:15pm and 5pm. On Wednesdays, some primary children leave at the end of the morning session, either at 11:30am or 12:00pm. Other primary children stay as they attend after school clubs and may leave at 4:00pm, 5:00pm or 6:00pm depending on which clubs they attend. The secondary school clubs usually operate between 3:30pm and 6:45pm but the schedule may vary from one day to the next. For example, on Mondays, CFBL have children leaving at 4:30, 5:30, 5:50 and 6:45 pm. It is noted that the majority of objections were raised by parents of CFBL in relation to the impact of the distribution centre on the safety of their children. Given the spread of pupil arrivals and departures across the extended school day, SEGRO's servicing vehicle restrictions would not eliminate the potential for conflict between vehicles and children.

2.38. The proposed servicing vehicles' restrictions mean that during peak school times all HGVs (7.5t -18t) would come via Grafton Road.

2.39. *Grafton Road*

2.40. Grafton Road is a very residential road but one which hosts high volumes of traffic. There is a time closure at the north end of Grafton Road which addresses the use of Grafton Road as a north south route alternative to Kentish Town Road and Malden Road. Grafton Road is also subject to an Experimental Traffic Order. This introduces restrictions to northbound and southbound motor vehicular movements on Grafton Road (approximately 50m to the north of the junction with Queen's Crescent). Grafton Road forms part of Cycle Superhighway 6 and one which both Camden and TfL have invested significant resources and funding into over the past decade, including schemes like Royal College Street, Midland/Judd Street and most recently the upgrade of Castle Road/Kentish Town Road junction. Camden are currently out to consultation to provide a dedicated cycle crossing across Mansfield Road which is accessed from Grafton Road. In addition to this Camden is developing a scheme at the junction of Prince of Wales Road and Grafton to improve cycle safety at this junction. Once these changes are made, Grafton Road will form part of a high-quality cycle route which will connect those on bikes from Hampstead Heath all the way to Elephant and Castle on high quality infrastructure. Introducing the proposed HGVs and associated turning movements to Grafton Road would have an adverse impact on the safety of those on bikes on this high-quality route.

2.41. There is a proposed movement from Spring Place to Grafton Road via a short stretch of Holmes Road. It is shown as being a secondary route in TA Appendix F (highlighted blue) but will be the primary route during the peak times. This is concerning for several reasons. This is in very close proximity to the Collège Français Bilingue de Londres which has nearly 700 pupils. Introducing a right and left turn around this tight dogleg route, at the same time this junction is likely to be experiencing high pedestrian volumes, is a safety risk. This school has a wide catchment area and data shows that nearly 20% of pupils use rail/overground to get to and from school. The quickest walking route from this school to Kentish Town West station is via the short stretch of Holmes Road. Additionally, over 40% of students either walk, cycle or scoot to this school. This is a significant volume of movements on streets close to the proposed development.

2.42. Impact on Spring Place

2.43. In order to facilitate on-site loading, the revised scheme proposes to alter the existing access arrangements to provide three access doors instead of four and widen the doors to 10m. The proposal to widen the doors to the building fronting Spring Place means that 18t lorries can enter and leave the site to unload. This removes officer's concern in respect of the transference of goods over the footway.

2.44. Cycle parking

- 2.45. The proposed floor plan shows parking for 10 cycles as well as lockers and showers. This meets the requirements of the London Plan and would be acceptable. The cycle parking would be secured by condition should the application be recommended for approval.
- 2.46. Appendix D: Anticipated Types of Outbound Delivery Fleet shows several vehicles including a cargo bike. The use of cargo bikes would be welcomed but it is noted that provision for cargo bikes is not shown on the proposed floor plan.
- 2.47. Delivery and Servicing Management Plan
- 2.48. The applicant would need to submit a Delivery and Servicing Management Plan (DSMP) to include details of frequency of deliveries, number and types of vehicles expected to deliver to the site, how delivery will be managed to prevent more than one vehicle turning up at the same time, how vehicles will access the site including vehicle swept path analysis, and how delivery times will be managed to reduce the impact on peak hour traffic movements on the surrounding road network. As this is fundamental to the operation of the site, outline details would need to be agreed at application stage. The final DSMP would need to be secured by legal agreement. In the absence of an acceptable scheme and hence a legal agreement, this would form a further reason for refusal.
- 2.49. The applicant is willing to commit to a condition requiring a DSMP which is relevant to the intended occupier of the site, prior to occupation. As the end occupier is not known at this stage, this commitment appears to be intended to provide reassurance to the Council. However, understanding how the site will operate is critical to determining if the change of use is acceptable. Therefore, an occupier specific DSMP secured post decision would not be acceptable.
- 2.50. As part of the DSMP, the Applicant has confirmed they are willing to commit to the following restrictions:
- The development shall not be served by vehicles over 18 tonnes or articulated HGVs.
 - The development shall be served by a maximum of 9 HGVs (18 two-way trips) per day.
- 2.51. In addition, the Applicant is also prepared to accept the following measures that would form part of the Final DSMP:
- Switch off the engine and radio;
 - The considerate closing of doors (do not slam);
 - Do not sound horn;
 - Using newer and quieter delivery vehicles and equipment, where possible;
 - Making sure all equipment, both on the vehicle and at the delivery point, is in good working order and maintained or modernised to minimise noise when in operation;
 - Ensure the delivery point and surrounding areas are clear of obstructions so vehicles can manoeuvre easily;
 - Keep doors other than the delivery point closed to ensure noise does not escape;
 - Make sure the delivery point is ready for the vehicle before it arrives – gates and doors should be open to avoid the vehicle idling; and
 - If a driver is early to a delivery slot, do not wait near residential property and switch off the engine.
- 2.52. The applicant suggests that these restrictions could be enforced via condition. Officers are concerned that these conditions would be difficult to enforce as they would be impracticable to monitor and so it would be difficult to prove a contravention of these requirements.
- 2.53. In response to these concerns the DSMP provides an example of the Deliveroo operation in Swiss Cottage which was allowed at appeal (Ref: APP/X5210/C/18/3206954) subject to a

number of conditions and obligations. One of these relates to the implementation of an Operational Management Plan, which was required to detail the control of delivery vehicles, the conduct of delivery drivers and the monitoring and review process. The applicant states that this is evidence that an Operational Management Plan / Delivery and Servicing Management Plan is a sufficient way of monitoring the future use at the site. However the Deliveroo appeal decision does not support the applicant's argument.

2.54. The appeal inspector noted the following concerns in relation to the Operational Management Plan (OMP):

90. The success of the OMP relies to a considerable extent on the individual members of staff and visitors, including riders, complying with the Code of Conduct controlling behaviour, the ability of marshals to carry out all their responsibilities and the effectiveness of deterrents and sanctions. The appellant accepted that it would be quite hard to control how people behave but considered that the prospect of the termination of contract would be a sufficient deterrent. However, identifying riders who did not comply with site policy and procedure would not be easy, whether because of the need for accurate information or the constraints on using the Deliveroo app. Also the appeal site does not have a dedicated fleet of riders because Deliveroo riders are contracted to provide services within the zone.

91. The marshal positioned at the site entrance would have a long list of responsibilities and at busy times it is doubtful that all could be effectively carried out. Traffic marshals have been employed at the site since about July 2018. Past experience, albeit pre-dating the OMP, does not encourage confidence. By way of illustration, the Council found during monitoring in April 2019 that despite marshals being present pedestrian safety was being undermined by Deliveroo motorbike riders.

2.55. Officers also note that conditions only allowed deliveries to be carried out by foot, bicycle or electric two wheeled vehicle and only allowed deliveries to customers between midday and 23:00 hours. In addition servicing vehicles were only allowed between 08:00 and 16:00. Even within this context the appeal inspector expressed deep reservations in relation to noise disturbance.

98. Within the permitted hours of use the control of noise from voices of riders, staff and marshals would be largely reliant on individual responsibility and behaviour. I have reservations about the ability to secure adherence to good practice and the capacity of the waiting area to accommodate riders. Noise disturbance to nearby residents is a possibility, especially during the evenings and into the early part of the night when residents are trying to sleep. I am not able to conclude that the development can be operated without harm to amenity, a test in Policy A4 for granting permission.

2.56. The inspector also voiced concerns in relation to highway safety.

100. The location of the site and the means of access to serve the use are not conducive to highway safety, taking account of the high volume of rider movements generated at peak delivery times, the pedestrian flows past the site entrance and the delivery time requirements essential to the concept. Policy 2.15 of the London Plan requires development proposals to contribute towards an enhanced environment and public realm in the town centre. Ease of movement on the footway is identified as a specific consideration by Policy TC4. The CLP focuses on vulnerable road users in the consideration of highway

2.57. In relation to the overall transport impact the inspector was not able to conclude compliance with Local Plan Policy A1 – Amenity.

102. Overall, I am unable to conclude that the development has adequately addressed the transport impact on the community and neighbours and the direction of Policy A1 is that the development should be resisted.

2.58. Despite the appeal inspector's significant reservations, they concluded that the grant of planning permission for a temporary period of 14 months would provide a way forward as this would provide an opportunity for a trial run. Subsequently a further temporary permission, for 9 months, was granted by the Council (ref: 2020/2367/P). In relation to this subsequent temporary permission, the planning committee minutes noted that "there did not appear to be sufficient evidence as of yet that the impact of the use on this site could ever be sufficiently mitigated". Nevertheless, a temporary permission was granted (in the context of Covid) to allow additional monitoring to be undertaken to establish whether the use was suitable for the site and capable of compliance with any controls or conditions to mitigate for amenity impacts. The Deliveroo use has not been granted a permanent permission and it is not clear whether such a permission would be granted.

2.59. Management of Construction Impacts on the Public Highway in the local area

2.60. The site's location presents significant challenges to construction, as it is intertwined with Network Rail property and has a railway bridge running through the development site.

2.61. Therefore a Construction Management Plan (CMP), a CMP implementation support contribution of £3,920 and a Construction Impact Bond of £7,500 should be secured as section 106 planning obligations in accordance with Policy A1. In the absence of a legal agreement this would form a further reason for refusal.

2.62. Travel plans

2.63. A Local Level workplace travel plan and associated monitoring and measures contribution of £4,881 will be secured as a section 106 planning obligation if planning permission were granted. The Travel Plan would be targeted towards the office use, to encourage staff to make walking, cycling and travel by public transport the natural choice for day-to-day trips. In the absence of a legal agreement this would form a further reason for refusal.

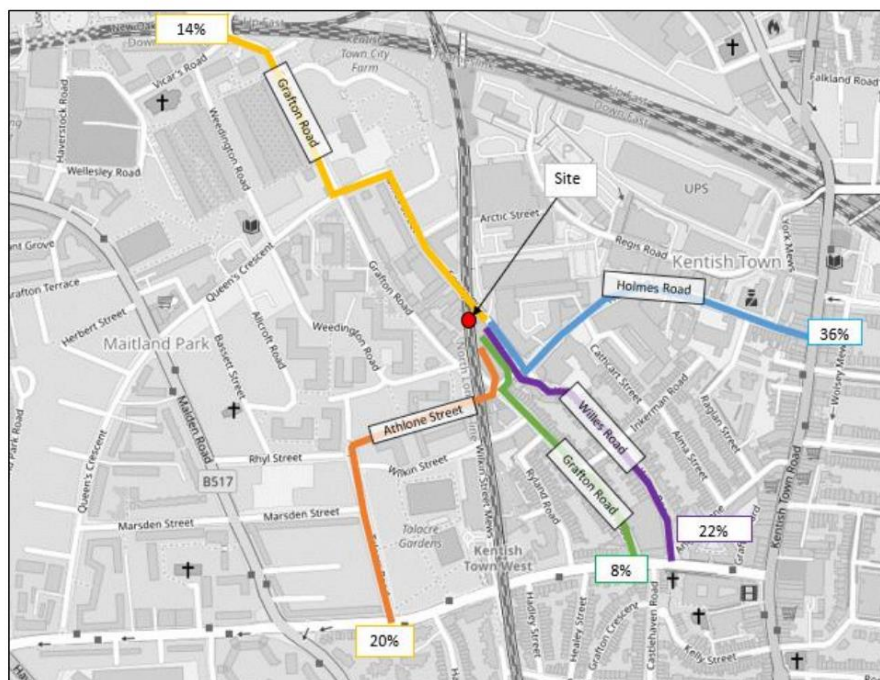
2.64. Parking

2.65. Policy T2 of the Camden Local Plan states that the Council will limit the availability of parking and require all new developments in the borough to be car-free. To prevent the future occupants from obtaining on-street parking permits from the Council, the development should be subject to a car free agreement and this would need to be secured by means of a Section 106 Agreement. In the absence of a legal agreement this would form a further reason for refusal.

2.66. Impact of delivery vehicles on the surrounding road network

2.67. The TA assesses the impact on surrounding roads and suggests how the movements might be dispersed across the local road network. The likely delivery radius is stated to be a 3 mile drive from the site. The route of vehicle trips departing/returning to the site on the wider road network has been determined with consideration given to travel time, ease of connection and delays on the network. The distribution of vehicles on routes to / from the site is set out below. This is an indicative assessment as the end occupier and final delivery radius is not known at this stage.

Figure 2: Distribution of Vehicles on Routes to/from Site



- 2.68. Officers are concerned that the proportion of traffic using Holmes Road would be more than shown. Grafton Road is subject to an Experimental Traffic Order which prevents north and south vehicle movement to the north of the junction with Queen's Crescent. This was introduced in May 2021.
- 2.69. In addition, the applicant's catchment map is based on driving distance from the depot but in reality the catchment may be based on isochrones i.e. driving time. Using the latter would shift the catchment further north as the average driving speeds in central London are lower than inner and outer London.
- 2.70. In addition, the applicant appears to assume ODF drivers will live in the catchment and the majority would arrive from the south. This is considered very unlikely as the price of housing and the shortage/cost of parking in inner/central London make it an unlikely residential location for van drivers. Officers also challenge the assumption that van drivers would, on average, reside 1.5 miles from the depot. It is considered that a significantly longer commute (for instance, a 12 mile commute) would not deter someone who drives for a living. ODF drivers approaching the site from the north would not be able to use Grafton Road between 7am and 10am. Therefore, a proportion of the assumed traffic on Grafton Road would need to divert, probably to Holmes Road.
- 2.71. All the above points suggest the proportion of traffic using Holmes Road would be more than shown. The proportion of delivery vehicles using Holmes Road raises concerns given the two schools on this road and the KSI hotspot at the junction of Holmes Road and Kentish Town.
- 2.72. In relation to the Council's concerns with the route (Spring Place – Holmes Road – Grafton Road) which passes close to the Collège Français Bilingue de Londres, the applicant has advised that the proposals will not significantly increase vehicle movements at this location. As part of the supporting information submitted to the Council, the applicant provided a video to demonstrate operation of the 'last mile' delivery depot. From this video, it is evident that the last mile model could concentrate vehicle movement to times when pupils will be travelling to and from school with 41 delivery vehicles leaving the site sequentially within a 2½ hour slot in the morning and then returning over a 2½ hour period in the late afternoon. While this video provides an example of how the use could operate, it is unknown how this site would operate in practice as the future occupier of the site is not known.

2.73. Transport Conclusion

- 2.74. Spring Place is located within a network of local roads and access to the strategic road network is a significant distance from the site. As such, Spring Place is not considered to be a suitable location for a last mile delivery depot. This assessment is supported by the findings of a 'Viability & Suitability of Use Report' prepared by Currell dated September 2016 submitted for a previous application at this site (planning ref: 2016/5181/P). This report was provided to support the redevelopment of the site involving a change of use from industrial use Class B2 to office (Class B1), Cafe (Class A3) and flexible event space (Sui Generis). This report concludes that the existing site and premises is not well located in terms of its position and relationship with nearby industrial uses, that it is near to a number of noise-sensitive uses, and that it does not offer good servicing access. In particular, the Currell report includes the following assessment which is relevant to the current application.

"We do not believe the location would be appropriate for the majority of Class B2/B8 occupiers as it is not an established (current) light industrial / warehouse location, with the majority of the surrounding occupiers being residential. In this regard you have to also consider what users would be appropriate and not cause nuisance to the residential in the immediate vicinity with noise, pollution, traffic generation etc."

"In terms of accessibility and road links between the subject site and Central London, these are inadequate and road restrictions in the immediate area would make it very difficult for larger vehicles associated with Class B2 and B8 used for deliveries etc. to effectively service the wider area and including Central London from this location"

"Access and egress for large delivery and servicing vehicles (associated with Class B2/B8 uses) is not easy as they are mainly residential streets surrounding which are not built for large vehicles which can block the streets and cause problems for other vehicles."

"Whilst there are a couple of similar uses in the vicinity, this part of Kentish Town (on Spring Place) is not an industrial location, being in a mainly residential location with some shopping facilities nearby on Prince of Wales Road."

- 2.75. The officer's committee report for this previous application to redevelop the site, assessed the loss of the B2 use at this site. In this case, the officer did not agree with the applicant's conclusion that the site fell into category 3 in relation to the Council's guidance on 'Light industrial, industrial, storage and distribution'. Category 3 sites being defined as heavily compromised and may not be suitable for continued industrial use when they become empty or need significant investment. The officer's report included the following conclusion.
- 2.76. *"Whilst officers agree that there are elements to the site which detract from its quality, it is considered that the space should be categorised in between 2-3. This is due to the site benefitting from good floor-to-ceiling heights and wide openings for access. However, the surrounding sensitive uses and relatively restricted access to the site by virtue of the relatively narrow residential streets contribute to the site's low score. The sensitive nature of the site has been made more prevalent by recent permissions which have seen residential uses granted in close vicinity to the site at 104 Grafton Road (LPA Ref. 2015/1837/P), in particular."*
- 2.77. The officer's report highlights the sensitivity of the increasingly residential surrounding area and the difficulty of access from narrow streets as elements that compromised the B2 use of the site. The accessibility concerns were also picked up by the appeal inspectors for two different appeal sites on Spring Place (see planning history section - planning ref: PEX0000686 and 9501761). The proposed last mile distribution use would be likely to exacerbate the local road conditions and sensitive residential context.
- 2.78. Officers are also concerned that the trip generation calculated for the last mile depot is not

sufficiently robust and may underestimate future vehicle movements. This concern is particularly acute given that the end occupier is not known at this stage and that the operation could involve an on demand grocery delivery operation for which no details of trip generation have been provided.

- 2.79. In addition, the potential owner driver franchisee model for the last mile delivery depot would lead to an increase in car commuting which would be contrary to the spirit of the Council's transport policies, in particular Policy T2. Furthermore, the proposed use of Holmes Road for servicing and operational delivery vehicles would run counter to the Council aspirations for reducing traffic and improving transport safety in this area.
- 2.80. The applicant's TA places great weight on the previous B2 use by Addison Lee and concludes overall daily vehicle numbers would significantly decrease when compared against this past use. However, the previous use by Addison Lee, for the service and repair of their cars, is very different in character to the proposed 'last mile' distribution use where the applicant seeks round the clock use as well as use at weekends. It is also noted that Addison Lee benefited from the historic use of this site as industrial floorspace (B2). As such, the amenity impacts from the Addison Lee use were never formally assessed as being acceptable. Moreover, since Addison Lee ceased operation in January 2017 the context has evolved with existing and planned vehicle restrictions to the local road network. The Development Plan and supporting supplementary planning documents have also evolved since the operation of Addison Lee.
- 2.81. The London Plan recognises that development proposals can negatively impact the transport network and can have harmful public health impacts (Policy T4). The biggest transport-related impact of development on public health in London is the extent to which it enables physical activity from walking, cycling and using public transport. Policy T2 'Healthy Streets' recognises the importance of streets in promoting walking, cycling and public transport use. There is a concern that a distribution depot adjacent to a residential area with a number of schools nearby, would have a negative impact on the levels of walking and cycling and would not reduce the dominance of vehicles in this area.
- 2.82. Given the above considerations, officers consider that the site is not a suitable location for a last mile delivery depot and this use would be likely to have an unacceptable impact on road danger and pedestrian safety as well as discouraging walking and cycling.
- 2.83. **Amenity**
- 2.84. Policy A1 seeks to ensure that standards of amenity are protected and the Council resists development that causes unacceptable harm to amenity. Given the limited changes to the external appearance of the property, the proposed development would have no impact in terms of overlooking, outlook, or daylight and sunlight. Policies A4 'Noise and vibration' and A1 'Managing the impact of development', seek to protect residents of existing residential developments and the occupiers of other noise-sensitive developments from the adverse effects of noise and vibration.
- 2.85. Deliveries, collections and the loading and unloading of goods and refuse can be a source of disruption and cause noise nuisance to nearby residential properties, particularly when undertaken at night. The Council expects deliveries and refuse collections to be carried out between 08:00-20:00hrs. Developments requiring deliveries outside of these times need to demonstrate there will be no adverse impact in relation to noise, with particular reference to residential occupiers as a result of these activities.
- 2.86. Given the proposed development seeks 24hour use and is likely to generate traffic, a noise impact assessment (NIA) has been submitted. This includes a detailed daytime and night-time environmental noise survey as well as a vibration assessment. For robustness the assessment considers the proposed use and is not compared with the previous Class B2

use. The assessment also considers the likely typical noise levels in the area to compensate for the potentially artificially low levels as a result of the coronavirus pandemic.

2.87. Noise Breakout

2.88. The noise impact assessment is based on typical measured noise levels from loading operations at a similar SEGRO site in Deptford and the results of the noise survey. The assessment assumes the roller shutter door would be open. The applicant's assessment indicates the noise breakout to the nearest noise sensitive residential properties would be negligible.

2.89. Noise Impact From 24 hour use

2.90. Officers accept that the revised scheme, in which all servicing would be undertaken internally, would reduce the noise impact, however there remains a concern that noise from the opening and closing of delivery bay shutters and from vehicle manoeuvring including reversing alarms could still harm neighbouring amenity. As such, officers still have concerns in relation to 24 hour operation and deliveries outside the Council's expected delivery hours of 08:00-20:00hrs. Officer's note that the applicant is willing to commit to a condition to ensure noise from plant or machinery would accord with the Council's policies.

2.91. Traffic Noise Assessment

2.92. To inform the assessment of noise generated by vehicle movements, the noise impact assessment considers historical noise levels measured from similar delivery vehicle movements. These are considered to be representative of 'worst-case' noise levels. Noise levels measured for commercial vehicle pass-by is detailed below. Commercial vehicles include HGV and LGV which have similar noise levels. It is considered that for robustness, the assessment should also have considered noise from moped, scooters and motorcycles.

Event	Duration (seconds)	Specific Sound Level (dB) at 5m*	Sound Exposure Level (SEL dB) at 5m
Commercial HGV and LGV Vehicle Pass-By	5	73 dB	80 dB
Small Cars and Small Vans Vehicle Pass-By	5	70 dB	77 dB

*Corrected for prevailing background noise levels at time of measurement

2.93. A calculation of future traffic noise has been undertaken based on the results of the noise survey, current traffic flow and future traffic flow over a typical 24 hours for the three proposed uses. Officers are concerned that the traffic noise calculation is based on the trip generation associated with a last mile delivery depot (either with an owner driver franchise or fleet model of operation). Officers also have concerns with the 'predicted number of vehicles' used to calculate the future traffic noise increase (as shown in a table on page 21 of the Hann Tucker Associates report dated 28/07/21). Fleet vehicles leaving at 5am and 6am seems highly unlikely for a last mile delivery operation and does not accord with descriptions of last mile delivery operation provided elsewhere in the application submission.

2.94. As the future operator of the site is not known, granting permission for a B8 use could potentially allow the site to be used as a 'dark store' for home delivery services with significantly greater transport impacts. For example, it could conceivably be an operation with mopeds and scooters with up to 40 arrivals and 40 departures within an hour during peak operational hours, which could be until midnight or potentially 24 hours. This type of operation would generate significantly more noise over a greater period of time than that assessed by the applicant's NIA.

2.95. Vibration

2.96. The submitted noise assessment indicates that there would be no adverse impact from the increase vibration from traffic flow for any of the proposed uses. It is noted that there is an overground train nearby. The noise assessment states it is more likely that vibration from the train line would be observed than any increase to traffic flow.

2.97. Noise and vibration summary

2.98. The submitted noise assessment suggest there would be no harm to neighbouring amenity from the proposed change of use to storage / distribution (Class B8) operating 24 hours with deliveries outside the Council's expected hours.

2.99. Nevertheless officers remained concerned that the noise assessment only examines one type of operation (last mile delivery depot with fleet or ODF) and that the noise implications of more intensive use have not been assessed. In addition, officers still have concerns in relation to 24 hour operation and deliveries outside the Council's expected delivery hours of 08:00-20:00hrs. The nearest noise sensitive residential dwellings are flats at 7 Spring Place approximately 43m away. Late night operation in this context could cause disturbance from opening and closing of delivery bay shutters or vehicle manoeuvring including reversing alarms. An operational management plan (OMP) could help to limit noise disturbance. However, the presence of an OMP does not of itself guarantee that neighbouring amenity is protected and relies to a considerable extent on the individual members of staff complying with the Code of Conduct controlling behaviour (as set out in paragraph 2.54 of this report).

2.100. **Air Quality**

2.101. The borough has been declared an Air Quality Management Area (AQMA) for both NO₂ (Nitrogen Dioxide) and PM₁₀ (Particulate Matter). Camden is also working to assess and address PM_{2.5} (the smallest fraction of particulate) because despite Camden meeting EU limit values for PM_{2.5}, research suggests that particulates of this size have the worst health impacts. Air pollution is associated with a number of adverse health impacts, and it particularly affects the most vulnerable in society.

2.102. Road transport is a significant source of air pollution in London (both PM₁₀ and NO₂), primarily from vehicle exhaust and tyre and brake wear. In addition to Policy CC4, the Local Plan also actively supports the improvement of air quality in Camden by requiring all new development in the borough to be 'car-free' (see "Policy T2 Parking and car-free development").

2.103. In order to help reduce air pollution and adhere to London planning policy, developments must demonstrate that they comply with Policy SI 1 of the London Plan (to be at least air quality neutral).

2.104. A key development objective of the Kentish Town Planning Framework is for sustainable, innovative development that delivers a zero emissions neighbourhood. Developing a zero emission neighbourhood will address many of the recommendations put forward by Camden's Citizens' Assembly on how to tackle the Climate Crisis. A zero emissions neighbourhood also responds to identified public concern with air quality in Kentish Town and there is an aspiration in the framework that, over time, development would emit no local combustion based pollutants such as vehicle emissions.

2.105. SEGRO have committed to make it a condition of an occupier's lease (should the unit be occupied for a last mile B8 use) that 25% of its vehicle fleet will be electric or otherwise emission free. This commitment is welcomed, although it is noted that DPD, Vandon Street has an all-electric operation. Likewise the last mile logistics use at Vulcan Wharf in Stratford

which the LLDC has resolved to grant (subject to the conclusion of a legal agreement – application ref: 20/00307/FUL) would also be served by either electric vehicles or cargo bikes.

2.106. Operational impact of development on local area

2.107. The air quality assessment states that potential air quality impacts associated with the operational phase road vehicle exhaust emissions are predicted to be “negligible”. This is based on the assumption of 92 two way trips which would be within the threshold of 100 Annual Average Daily Traffic (AADT) in a AQMA and so would not trigger the IAQM screening criteria. The number of trips have been estimated using 2 smaller sites with both operated by DPD and a larger site (comparable in scale to the proposed development) operated by Royal Mail. However, as the end use of the proposed development is not yet confirmed, there is some uncertainty as to the accuracy of these comparisons.

2.108. The average daily trip rate (per 100sqm) is averaged out as 4.921 and it is then stated that based on the floor area of the application site, this would result in 92 two way trips. If the highest of the example daily trip rates were used (5.5 per 100sqm for Royal Mail) this would equate to 104 ‘two way’ trips.

2.109. While theoretically the number of trips is less than the 100 AADT threshold, given that the occupant of the development is not known and that a small trip increase could easily take the number of trips over this threshold, it would be reasonable to require an assessment of potential impacts on the local area. This has not been provided.

2.110. In addition no information is provided on the proposed gas boilers. A non-combustion heating system is encouraged in areas of poor air quality but if a gas boiler is proposed then this should be confirmed as an ultra low NOx (rating of <40 mg/kWh) as a minimum.

2.111. AQ Neutral assessment

2.112. In order to help reduce air pollution and adhere to London planning policy, developments must demonstrate that they comply with Policy SI 1 of the London Plan (to be at least air quality neutral). Major developments are required to demonstrate that they are at least air quality neutral. No assessment information has been provided.

2.113. Operational impact on the occupants of the development

2.114. No assessment of the operational impact on occupants of the development is provided.

2.115. Construction impacts risk assessment

2.116. No assessment of the construction impacts risk is provided. However it is noted that the development involves a refurbishment of the existing building with limited construction works proposed.

2.117. Air quality conclusion

2.118. The absence of an air quality assessment which assesses the potential impact on the local area and which demonstrates that the development would be at least air quality neutral, would form a reason for refusal. Without this information, officers cannot be certain whether there would be any harm to air quality and the occupants of the surrounding area. This assessment is especially relevant given the public concerns with air quality in Kentish Town and the objectives of the KTPF.

2.119. **Design**

2.120. The revised proposal would involve reconfiguring and widening the existing loading doors,

to allow all servicing to be undertaken off-street. The 3 existing loading doors at the southern end of the Spring Place elevation would be replaced by 2 wider loading doors, which will be 10m in width. The existing loading door to the northern end of the Spring Place elevation would also be widened to 6.4m. The proposed changes would result in the loss of four Crittall windows and the character of the front elevation would be diminished somewhat.

2.121. The proposals also involves the refurbishment of the existing building including the renewal of the remaining Crittall windows (updated to improve thermal performance) and the retention of profiled horizontal band beneath the roof line. The frontage to Spring Place would be refurbished in white render. It is proposed to add two vertical signage zones at either end of the building.

2.122. A similar principle of refurbishment of the existing building is used on the Grafton Rd frontage with the addition of vertical panels of green walls and profiled timber.

2.123. In summary, the retention of the existing building is welcomed as this supports the building's contribution to the history and mixed use character of the area. Retention, refurbishment and adaption of the existing building is also in accordance with the London Plan Policy D3 and takes account of the principles of the circular economy. The diminishment of the character of the front elevation is balanced against achieving this reuse.

2.124. Designing out crime

2.125. A series of recommendations have been received from the designing out crime officer. These would be secured by condition if the application were to be approved.

2.126. **Energy and Sustainability**

2.127. Policy CC1 promotes zero carbon development and requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy. The London Plan policy SI 2 expects major developments to be net zero carbon. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Non-residential development should achieve 15 per cent through energy efficiency measures. The Council also expects developments of more than 500 sqm of any gross internal floorspace to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation (which can include sources of site related decentralised renewable energy), unless it can be demonstrated that such provision is not feasible.

2.128. The Council expects the application of a BREEAM assessment to non-residential developments (including conversions, extensions and changes of use) of 500 sqm or more. The Council expects non-domestic developments of 500sqm of floorspace or above to achieve "excellent" in BREEAM assessments and encourages zero carbon in new development from 2019.

2.129. The proposals generally meet or exceed the policy requirements achieving an overall reduction in carbon emissions of 82.7% with 30.8% through energy efficiency and 75% from onsite renewables. The BREEAM pre assessment indicates an "Excellent" rating for Refurbishment and Fit Out with an overall score of 78.9% and 66% in energy, 75% in water and 78% in materials which meets the requirements. An external living wall is proposed and further details would be secured via condition if planning permission were to be granted. The existing building would be made more energy efficient with good wall insulation and double glazing, air tightness of 5 m3/h/m2 or below and efficient lighting. Heating and hot water is through efficient gas boilers. Whilst a non-combustion heating system is encouraged in areas of poor air quality this should meet the requirements, as long as it is confirmed as ultra low NOx (rating of <40 mg/kWh). Solar PV (222.7sqm) is proposed and

further details would be secured by condition if approval was recommended.

2.130. The development should future proof for connection to district heating unless shown to be more than 1km from existing or proposed networks. Should the application be recommended for approval, this would be secured by condition.

2.131. Subject to the conditions outlined above, the proposed development is acceptable in relation to energy and sustainability (Policies CC1 and CC2).

2.132. Sustainable drainage

2.133. The proposal involves limited changes to the existing building. While the roof covering would be renewed the existing roof structure would remain. Surface water run-off will be collected by way of rainwater pipes into the existing below ground surface water drainage system which will discharge to the existing combined 450mm diameter sewer network running south of Grafton St and the existing combines 300mm diameter sewer in Spring Place. A portion of roof area would be used for rain water harvesting, to be used in toilet facilities on site.

2.134. Due to the nature of the existing development and its current arrangement, the peak run-off for this site cannot be designed as close as reasonably practicable to the greenfield runoff rates and the 50% reduction would not be viable given the scope of the development.

2.135. The applicant was requested to investigate the feasibility of a green roof below the proposed PV panels. Green roofs are compatible with solar PV because the cooler temperature created locally by the vegetation improves the efficiency of the solar panel. A green roof would be beneficial both in terms of SUDS and biodiversity. The applicant has not provided this investigation. Therefore, if the proposed development was otherwise acceptable, a condition would be recommended to secure an investigation of the feasibility of a green roof under the PV panels.

2.136. Nature Conservation

2.137. The railway that runs through the site is identified as a green corridor (missing link). The development proposes sections of green living wall to the Grafton Road elevations. This would provide biodiversity enhancements at the site and is welcomed. Details haven't been provided, but officers would expect the living walls to include a variety of nectar rich species which are native or those of known value to wildlife in order to enhance the Site and the identified green corridor (missing link) in accordance with Policies A2 and A3. To ensure appropriate species and maintenance, details of the green walls would be secured by condition if the application was approved.

2.138. A bat roost survey has been undertaken. The Site was assessed to have negligible potential for roosting bats, with a lack of suitable structural features and limited foraging and connective habitat within the immediate surrounding area.

2.139. Employment and training planning obligations

2.140. While the development involves a change of use of approximately 1,900sqm, the scheme is a refurbishment and is not a high intensity redevelopment of the site. As such, Policy E2 does not require an employment and training contribution in this instance.

2.141. Conclusion

2.142. The refurbishment of the existing building is welcomed given the long period of vacancy and the potential to bring employment use back to the site. Officers also support the change of use to flexible use as either industrial (Class B2) or light industrial (Class E). However, the proposed use of the site for storage or distribution (Class B8) cannot be supported. The site

is located in a network of local streets and the surrounding context is residential. As such, the site does not provide a suitable location for a last mile delivery depot and this use would be likely to have an unacceptable impact on road danger and pedestrian safety as well as discouraging walking and cycling. Furthermore, the proposed use of Holmes Road for servicing and operational delivery vehicles would run counter to the Council aspirations for reducing traffic and improving transport safety in this area.

- 2.143. Officers are also concerned that the trip generation calculated for the last mile depot is not sufficiently robust and may underestimate future vehicle movements. This concern is particularly acute given that the end occupier is not known at this stage and that the operation could involve an on demand grocery delivery operation for which no details of trip generation have been provided.
- 2.144. The development's proposed 24 hour operation and deliveries outside the Council's expected delivery hours of 08:00-20:00hrs, would be likely to result in harm to neighbouring amenity in terms of noise. In addition, officers remained concerned that the noise assessment only examines one type of operation (last mile deliver depot with fleet or ODF) and that the noise implications of more intensive use have not been assessed.
- 2.145. Finally, the absence of an air quality assessment which assesses the potential impact on the local area and which demonstrates that the development would be at least air quality neutral, would form a reason for refusal. Without this information, officers cannot be certain that there would be no harm to air quality and the occupants of the surrounding area.
- 2.146. A further four reasons for refusal relate to the absence of a legal agreement to secure the following obligations: Construction management plan (including CMP implementation support contribution and construction impact bond); car free development; workplace travel plan and associated monitoring and measures contribution; and a delivery and servicing management plan.