

# OCADO



SUPPORT THE FIGHT  
AGAINST OCADO'S N19 DEPOT  
[WWW.NOCADO.ORG](http://WWW.NOCADO.ORG)

Dear Neighbours,

As I'm sure most of you are now aware, Ocado have submitted yet another CLEUD application, which is now live on the Islington Planning Portal and is open for comments (application no P2021/2664/COL).

This application is in addition to Ocado appealing the outcome of the Judicial Review earlier this year, which upheld the Council's revocation of the original CLEUD, granted under misleading evidence. Their request for an appeal is still awaiting a decision.

To be blunt, they are having another go at this route. Why? Because they can.

To summarise, the latest CLEUD application is trying to establish that the site was used as storage for a continuous 10-year period, conveniently during a time where records have been lost, so it relies on witness statements.

Ocado have submitted nearly 500 pages of evidence. True to form, the sheer scale of the evidence is designed to be intimidating, but scratch the surface and their arguments quickly fall apart.

The NOcado campaign group have combed through the evidence alongside our legal team with a view to not only discredit Ocado's claims, but also to prevent them from submitting further CLEUD applications.

## **WHAT IS A CLEUD?**

**A Certificate of Lawful Existing Use or Development**

This is a certificate granted by a local planning authority to retrospectively legalise a previously unauthorised use or development.

It is essentially a means of obtaining a decision from the planning authority that a property or development can be used in a certain way without requiring planning permission.

As it stands now, if a developer can prove a property or development has been used in a certain way for a continuous 10-year period at any given point in the past, they can apply to officially get the status of the site changed to legalise the previously unlawful use.

## WHY ARE OCADO SO DESPERATE FOR A CLEUD?

With a planning application, a scheme this large would be treated as a major development, and would be evaluated on a number of things, including its impact (both positive and negative) on its environment.

If Ocado were to go down the planning application route, they would need to be transparent about its intense usage of the site, and provide impact statements on air pollution, noise and traffic.

Planning permission can then be denied, or given with (or without) legally binding conditions on things like vehicle types, noise levels and hours of operation.

Obtaining a CLEUD avoids all of the above, and allows Ocado free rein over the site with complete disregard for the welfare of its neighbours.



## HOW YOU CAN HELP

We have a strong technical and legal argument against this site, but what we need to back it up is crucial community support.

We need heartfelt responses as individuals to show the Council:




- that the local community objects to the depot;
- that it has already been disruptive and it is not even in operation yet;
- that we do not want the additional noise, traffic, light and air pollution this depot will bring;
- that we do not trust Ocado's assertions that they will be good neighbours after everything they have put the community through;
- that their jobs argument is crumbling as we watch their drivers on the Acton site protest and take action about their treatment;
- and ultimately that there is no place for a 24/7 distribution depot in the heart of a thriving community, next to a school, park and residential streets, not in ours and not in any.



### **Deadline for comments is 31<sup>st</sup> October 2021**

Comments are per person (rather than per household). Either scan the QR code with your phone camera, or search for Planning Application Number P2021/2664/COL on the Islington Planning Portal.

Thank you in advance for all objections - every single one counts. And thank you also to all who have recently donated, contributed and supported our recent fundraising events. Without this we would not be able to afford much needed legal consultation.

For further updates on the campaign, or if you'd like to make a donation to help fund legal costs visit [nocado.org](http://nocado.org) or    #nocado

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