

Application No:	Consultees Name:	Received:	Comment:	Response:
2024/0479/P	Sejal Parmar	02/04/2024 13:31:57	OBJ	<p>I object to the planning application on the following bases:</p> <p>1. Harm to Regent's Canal Conservation Area and the Grade II* Listed Roundhouse The application proposes various types of heritage harm to both the Regent's Canal Conservation Area and the Grade II* Listed Roundhouse. This will include harm to the significance of both heritage assets, harm to the character and appearance of the Regent's Canal Conservation Area and harm to the special interest of the Roundhouse.</p> <p>The proposed application and the ensuing harm to heritage assets should be assessed against conflicts with the following policies: Camden Local Plan 2017 - Policy D2 Heritage - Listed Buildings (k) Camden Local Plan 2017 - Policy D2 Heritage – Conservation Areas: (e) Camden Planning Guidance - Design SPD – Heritage: key messageThe Council will only permit development within conservation areas that preserves and where possible enhances the character and appearance of the area. Camden Planning Guidance - Design SPD – Heritage 3.9 Emerging Camden Draft Local Plan 2024– Site Allocation C9(CGY4) – Development and Design Principle (d)</p> <p>The only significant nod to the importance of these heritage assets is the decision to make the student housing towers cylindrical, which is a very simplistic and derivative design decision, one that is unworthy of a building as important as the Roundhouse. It is also unclear whether the decision to make the towers cylindrical came about because it's the easiest layout to pack in as many rooms as possible, maximising developer profit at the expense of the local community's assets.</p> <p>It is suggested that the designed is revised to be less dense and less tall in order to avoid harming these significant heritage assets.</p> <p>2. Overbearing scale and height of the proposal that is out of keeping with the area The vast majority of the buildings on Chalk Farm Road are 3-4 storeys in height. The proposal is for what is effectively four towers (even though three of the towers are described as 1 building with 3 cylindrical volumes) raging in height from 6-12 storeys. This is significantly out of keeping with the character of the area and would result in an overbearing wall of buildings that would visually dominate the entire area. The buildings would also obscure the Roundhouse and become by far the most prominent visual element on the street. Finally, the tallest tower proposed as part of the scheme appears to meet the definition of tall buildings for the area, as noted within Camden's 2023 Building Heights Study. If one is to look at the submitted sections and measure the height of the biggest cylinder from the base to the top of the building, it totals at 36 meters, whereas tall buildings in the area are defined as buildings taller than 30 meters. The building heights study looks at this site in particular and notes that there is no potential for tall buildings. It goes on to say that 'Sensitive environment, situated within Regents Canal CA, amidst smaller scale intricate townscape along Chalk Farm Road, and adjoining / in views towards Grade II * listed Round House and Camden Market. Very large or tall buildings would be overly dominant, detracting</p>

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from views and be out of character.' Despite this, FOUR closely spaced towers are proposed on the site. A reduction in density and height would alleviate these concerns.

The scale and height of the proposals should be assessed against conflicts with the following policies and guidance:

Camden Local Plan 2017 – Policy D1 – Design - (a), (b), 7.2
Camden Planning Guidance - Design SPD 2021 – 2.11
Emerging Camden Draft Local Plan 2024– Site Allocation C9(CGY4) – Indicative Capacity
Camden Tall Buildings Study 2023 – Area AS06 - 04

3. Negative impact on daylight and sunlight amenity to neighbouring residents, often to levels that are below recommended limits, resulting in unhealthy and dark homes
The development would result in reductions to neighbouring residents daylight and sunlight levels that are significantly below BRE recommended levels. The submitted daylight and sunlight report already uses a reduced metric for VSC that is in the mid-teens, however some of the reductions fail to meet even this. The report weaves an argument that if existing residents did not have balconies, our light levels wouldn't drop to levels that are below recommendations as a result of this development. This is a false dichotomy, as both light and private outdoor space are crucial to a healthy home, and every person deserves to have both. Furthermore, if one uses the standard VSC metric of 27%, the majority of analysed homes will fail BRE recommendations regardless of the existence of balconies. Finally, the daylight/sunlight report does not provide results for the light impact of the consented Juniper Building, or the emerging Juniper Crescent redevelopment. Considering the fact that the proposed development would already drop light levels to below recommended limits, it is crucial that these neighbouring developments are included in the calculation, as they will be blocking the little light there is left. It is unacceptable to be subjecting residents to such unhealthy living conditions. A reduction in density and height or alternative layouts that consider daylight/sunlight impact to existing residents could alleviate this.

The proposed application and the ensuing reductions to daylight/sunlight amenity of neighbouring residents should be assessed against conflicts with the following policies:
Camden Local Plan 2017 – Policy A1 (a); (f);
The London Plan 2021 – Policy CG3

4. Overlooking and loss of privacy to existing residents

The development would result in residents on the other side of Chalk Farm Road being overlooked by 3 towers of student housing. The current use of the site is for offices, meaning that any potential impacts to privacy are restricted to working hours, and to one 5 storey building. The development would see neighbours overlooked by a far larger number of people in much taller buildings, 24/7. This would have a great impact on the privacy of existing residents and on their health and mental wellbeing. A reduction in density and height or alternative layouts that avoid overlooking could alleviate this.

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The proposed application and the ensuing reductions to daylight/sunlight amenity of neighbouring residents should be assessed against conflicts with the following policies:
Camden Local Plan 2017 – Policy A1 (a); (e); 6.4;
Camden Planning Guidance 2021 – Amenity – 2.2; 2.3;

5. Poor quality of accommodation within the proposed development

The extreme density of the scheme would result in poor housing quality for both the students and residents within the affordable housing tower proposed as part of the scheme. This includes: 1. Internal light levels to numerous homes are below recommended limits; 2. Extreme overlooking with some windows facing each other at only several meters apart; 3. Poor outlook and lack of privacy; 4. Noise from nearby railways; 5. Poor quality outdoor amenity where the wind conditions make it uncomfortable for sitting, as per the submitted Wind Microclimate report;

The proposed application and the poor quality of accommodation within the homes should be assessed against conflicts with the following policies and guidance:
The London Plan 2021 – Policy D6 (D); Table 3.2 (iii)
Camden Local Plan 2017 - Policy D1 (n); 7.32

6. Extremely poor quality of accommodation specifically for students with disabilities, resulting in a development that is not inclusive

The rooms for students with disabilities proposed as part of the application are clearly subjected to by far the worst light levels and by far the worst outlook within the development. They are relegated to the intersection of the three student housing towers (referred to as cylindrical volumes) where some of the windows facing each other are a mere several meters apart, and where internal light levels are extremely low. This type of layout goes against all principles of inclusivity, and would relegate students with disabilities to homes that are unhealthy and unpleasant to live in.

The proposed application and the distribution of homes for students with disabilities should be assessed against conflicts with the following policies and legislation:
The London Plan 2021 – Policy D7 3.7.3.
Equality Act 2010

7. Poor quality public open spaces and worsening of local wind conditions.

The only notable positive design-led contribution to the local community are marginally enlarged public open spaces on Chalk Farm Road. However, these spaces will receive very poor light levels, are located against a busy road, and will as a result of the development suffer from a worsening of wind conditions, making them in effect unlikely to be used due to the low quality of their design. Wind conditions throughout the majority of the adjacent areas will be unsurprisingly worsened by the presence of four towers (three of which are referred to as cylindrical volumes), making most of the adjacent street often unpleasant to sit on.

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The proposed application and the worsening of wind conditions in the area should be assessed against conflicts with the following policies:
Camden Local Plan 2017 – Policy A1 (a) (i); 6.24/

Summary: The proposed development would result in numerous negative impacts on the quality of life of local residents including unhealthier homes and loss of privacy. The development would also negatively impact the character of the area via various forms of harm to heritage assets and overbearing walls of tall buildings. In addition to this, many of the future residents of the scheme would be subjected to low quality homes, with disabled residents being relegated to homes with by far the unhealthiest light and privacy conditions. The slightly enlarged public realm would suffer from poor light levels and worse wind conditions than present. Finally, the affordable housing provision is very low. The scheme proposes only 24 affordable homes, against 250+ purpose built student homes. With all this in mind, it is difficult to see what the benefits of the scheme would be to the community, and even more difficult to see how these would outweigh all of the harm listed above.

Together with others objecting on the same bases outlined above, I urge Camden Council to take the long view and go back to the drawing board with the applicant, in order to put forward a scheme that addresses all of the above points. It is imperative that this development is made to work for the community, not just for developers. Local residents will have to live with whatever gets built for decades to come, including its impact on our health and quality of life.

Application No:	Consultees Name:	Received:	Comment:	Response:
2024/0479/P	Shanee Fischer	05/04/2024 08:16:11	COMMNT	<p>I object to the planning application on the following basis:</p> <p>1. Harm to Regent's Canal Conservation Area and the Grade II* Listed Roundhouse</p> <p>The application proposes various types of heritage harm to both the Regent's Canal Conservation Area and the Grade II* Listed Roundhouse. This will include harm to the significance of both heritage assets, harm to the character and appearance of the Regent's Canal Conservation Area and harm to the special interest of the Roundhouse.</p> <p>-----</p> <p>The proposed application and the ensuing harm to heritage assets should be assessed against conflicts with the following policies:</p> <p>Camden Local Plan 2017 - Policy D2 Heritage - Listed Buildings (k)</p> <p>Camden Local Plan 2017 - Policy D2 Heritage – Conservation Areas: (e)</p> <p>Camden Planning Guidance - Design SPD – Heritage: key messageThe Council will only permit development within conservation areas that preserves and where possible enhances the character and appearance of the area.</p> <p>Camden Planning Guidance - Design SPD – Heritage 3.9</p> <p>Emerging Camden Draft Local Plan 2024– Site Allocation C9(CG4) – Development and Design Principle (d)</p> <p>-----</p> <p>The only significant nod to the importance of these heritage assets is the decision to make the student housing towers cylindrical, which is a very simplistic and derivative design decision, one that is unworthy of a building as important as the Roundhouse. It is also unclear whether the decision to make the towers cylindrical came about because it's the easiest layout to pack in as many rooms as possible, maximising developer profit at the expense of the local community's assets.</p> <p>It is suggested that the designed is revised to be less dense and less tall in order to avoid harming these significant heritage assets.</p> <p>2. Overbearing scale and height of the proposal that is out of keeping with the area</p> <p>The vast majority of the buildings on Chalk Farm Road are 3-4 storeys in height. The proposal is for what is effectively four towers (even though three of the towers are described as 1 building with 3 cylindrical volumes) rising in height from 6-12 storeys. This is significantly out of keeping with the character of the area and would result in an overbearing wall of buildings that would visually dominate the entire area. The buildings would also obscure the Roundhouse and become by far the most prominent visual element on the street. Finally, the tallest tower proposed as part of the scheme appears to meet the definition of tall buildings for the area, as noted within Camden's 2023 Building Heights Study. If one is to look at the submitted sections and measure the height of the biggest cylinder from the base to the top of the building, it totals at 36 meters, whereas tall buildings in the area are defined as buildings taller than 30 meters. The building heights study looks at this site in particular and notes that there is no potential for tall buildings. It goes on to say that 'Sensitive environment, situated within Regents Canal CA, amidst smaller scale intricate townscape along Chalk Farm Road, and adjoining / in views towards Grade II * listed Round House and Camden Market. Very large or tall buildings would be overly dominant, detracting from views and be out of character.' Despite this, FOUR closely spaced towers are proposed on the site. A reduction in density and height would alleviate these concerns. The scale and height of the proposals should be assessed against conflicts with the following policies and guidance:</p> <p>Camden Local Plan 2017 – Policy D1 – Design - (a), (b), 7.2</p> <p>Camden Planning Guidance - Design SPD 2021 – 2.11</p> <p>Emerging Camden Draft Local Plan 2024– Site Allocation C9(CG4) – Indicative Capacity</p> <p>Camden Tall Buildings Study 2023 – Area AS06 - 04</p> <p>3. Negative impact on daylight and sunlight amenity to neighbouring residents, often to levels that are below</p>

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recommended limits, resulting in unhealthy and dark homes The development would result in reductions to neighbouring residents daylight and sunlight levels that are significantly below BRE recommended levels. The submitted daylight and sunlight report already uses a reduced metric for VSC that is in the mid-teens, however some of the reductions fail to meet event this. The report weaves an argument that if existing residents did not have balconies, our light levels wouldn't drop to levels that are below recommendations as a result of this development. This is a false dichotomy, as both light and private outdoor space are crucial to a healthy home, and every person deserves to have both. Furthermore, if one uses the standard VSC metric of 27%, the majority of analysed homes will fail BRE recommendations regardless of the existence of balconies. Finally, the daylight/sunlight report does not provide results for the light impact of the consented Juniper Building, or the emerging Juniper Crescent redevelopment. Considering the fact that the proposed development would already drop light levels to below recommended limits, it is crucial that these neighbouring developments are included in the calculation, as they will be blocking the little light there is left. It is unacceptable to be subjecting residents to such unhealthy living conditions. A reduction in density and height or alternative layouts that consider daylight/sunlight impact to existing residents could alleviate this.

The proposed application and the ensuing reductions to daylight/sunlight amenity of neighbouring residents should be assessed against conflicts with the following policies:

Camden Local Plan 2017 – Policy A1 (a); (f); The London Plan 2021 – Policy CG3

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The development would result in residents on the other side of Chalk Farm Road being overlooked by 3 towers of student housing. The current use of the site is for offices, meaning that any potential impacts to privacy are restricted to working hours, and to one 5 storey building. The development would see neighbours overlooked by a far larger number of people in much taller buildings, 24/7. This would have a great impact on the privacy of existing residents and on their health and mental wellbeing. A reduction in density and height or alternative layouts that avoid overlooking could alleviate this.

The proposed application and the ensuing reductions to daylight/sunlight amenity of neighbouring residents should be assessed against conflicts with the following policies:

Camden Local Plan 2017 – Policy A1 (a); (e); 6.4;

Camden Planning Guidance 2021 – Amenity – 2.2; 2.3;

5. Poor quality of accommodation within the proposed development

The extreme density of the scheme would result in poor housing quality for both the students and residents within the affordable housing tower proposed as part of the scheme. This includes: 1. Internal light levels to numerous homes are below recommended limits; 2.

Extreme overlooking with some windows facing each other at only several meters apart; 3. Poor outlook and lack of privacy; 4. Noise from nearby railways; 5. Poor quality outdoor amenity where the wind conditions make it uncomfortable for sitting, as per the submitted Wind Microclimate report;

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The London Plan 2021 – Policy D6 (D); Table 3.2 (iii)

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6. Extremely poor quality of accommodation specifically for students with disabilities, resulting in a development that is not inclusive

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worst light levels and by far the worst outlook within the development. They are relegated to the intersection of the three student housing towers (referred to as cylindrical volumes) where some of the windows facing each other are a mere several meters apart, and where internal light levels are extremely low. This type of layout goes against all principles of inclusivity, and would relegate students with disabilities to homes that are unhealthy and unpleasant to live in.

The proposed application and the distribution of homes for students with disabilities should be assessed against conflicts with the following policies and legislation:

The London Plan 2021 – Policy D7 3.7.3. Equality Act 2010

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The only notable positive design-led contribution to the local community are marginally enlarged public open spaces on Chalk Farm Road. However, these spaces will receive very poor light levels, are located against a busy road, and will as a result of the development suffer from a worsening of wind conditions, making them in effect unlikely to be used due to the low quality of their design. Wind conditions throughout the majority of the adjacent areas will be unsurprisingly worsened by the presence of four towers (three of which are referred to as cylindrical volumes), making most of the adjacent street often unpleasant to sit on.

The proposed application and the worsening of wind conditions in the area should be assessed against conflicts with the following policies: Camden Local Plan 2017 – Policy A1 (a) (I); 6.24;

Summary: The proposed development would result in numerous negative impacts on the quality of life of local residents including healthier homes and loss of privacy. The development would also negatively impact the character of the area via various forms of harm to heritage assets and overbearing walls of tall buildings. In addition to this, many of the future residents of the scheme would be subjected to low quality homes, with disabled residents being relegated to homes with by far the unhealthiest light and privacy conditions. The slightly enlarged public realm would suffer from poor light levels and worse wind conditions than present. Finally, the affordable housing provision is very low. The scheme proposes only 24 affordable homes, against 250+ purpose built student homes. With all this in mind, it is difficult to see what the benefits of the scheme would be to the community, and even more difficult to see how these would outweigh all of the harm listed above. I urge Camden Council to take the long view and go back to the drawing board with the applicant, in order to put forward a scheme that addresses all of the above points. It is imperative that this development is made to work for the community, not just for developers. Local residents will have to live with whatever gets built for decades to come, including its impact on our health and quality of life. I urge you take some more time to get this right.

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2024/0479/P	Patricia Thomas	29/03/2024 09:59:36	COMMNT	<p>I hope I am not too late to give my comments on this application. The cylinders that make up the bulk of the proposed development are quite unsuitable for the site, making a mockery of the roundhouse nearby and losing all vestige of the heritage associated with that building. Has anyone estimated the number of students needing accommodation when these cylinders are built. Nursery and other schools are being closed because of falling rolls, other schools have fewer students than they can accommodate, and there is no suggestion that this situation will change in the foreseeable future. And has anyone estimated the rental costs to students? Camden Planning had to stop the Stay Club management using the building as an hotel for visitors when it had planning only for students. The Stay Club is a stone's throw from 100 Chalk Farm Road. The Stay Club said that students were unable to pay the necessary rent. The premises are now used for students again, but it is noticeable that the residents are mainly from overseas as home-grown students still cannot afford the rent. And the Stay Club is not the only student accommodation in the area. Moreover the proportion of student accommodation compared with affordable accommodation for families etc. is totally out of kilter with local needs. I hope this application will be rejected in its entirety.</p>
2024/0479/P	Stella Lowy	04/04/2024 07:41:21	SUPPRT	<p>As a resident of the area who spends lots of time in Chalk Farm, I would welcome this development. It's an outstanding architectural design that will upgrade the area immensely and fits perfectly next to the Round House.</p>
2024/0479/P	Joanne Burns	03/04/2024 18:55:35	COMMNT	<p>Am happy to support this .</p>
2024/0479/P	Alex Hayim	04/04/2024 12:08:20	SUPPRT	<p>Support for this planning application. This is an excellent location for student accommodation and much-needed affordable housing and will add vibrancy to this strategic, under-utilised site. Regal are excellent developers with a proven track record and have a strong relationship with the local council.</p>

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2024/0479/P	Kathryn Gemmell (TRACT)	05/04/2024 08:53:38	OBJNOT	<p>RE: OBJECTION: planning application 2024/0479/P at 100 CHALK FARM ROAD</p> <p>I am writing, as Chair of TRACT (Tenants Residents Associations, Camden Town) to object to the above application for the following reasons.</p> <p>Harm to setting of listed building and character of conservation area. Substantial harm to setting of listed building and to the character and appearance to Regents Canal conservation area. The proposed scheme includes buildings of 11 stories adjacent to The Roundhouse which is a Grade 11* listed building.</p> <p>The proposed building closest to the Roundhouse is almost twice the height of the Roundhouse and is overbearing. The massing and clustering of the buildings is overbearing on the street and buildings opposite. The visualisations given are misleading (as they always are in planning applications). The views should show the scheme from street level and the view from residential properties opposite to properly illustrate the impact on the Roundhouse and street.</p> <p>Lack of C3 residential use. C3 residential use is the priority in Camden planning policy. Policy H2 requires 50% of new floorspace over 200sqm to be C3 residential within town centers and Central London. This development has none.</p> <p>Insufficient Affordable Housing Had the scheme been entirely of C3 residential use, then it would have had 130 dwellings. Camden policy has a target of 50% of all dwellings to be affordable, with a minimum of 35% to qualify for a fast-track viability assessment. 35% of 130 dwellings is 45 dwellings, whereas this development only provides 24.</p> <p>Loss of Employment. Camden policy E2 protects the loss of employment uses in the town centre save for exceptional circumstances. The existing building comprises 3,433 sqm of B1 office, with 824 sqm being provided. Exceptional circumstances have not been adequately demonstrated.</p>