

Application No:	Consultees Name:	Received:	Comment:	Response:
2024/0479/P	CA	06/04/2024 16:14:32	OBJ	<p>I object to the planning application on the following bases:</p> <ol style="list-style-type: none"> 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. 2. Wrong use of development mixing social and student accommodation. Creating possible disharmony with those who actually 'live' in the development and in the area, whilst having transient students - creating further possible impact on late night noise / disturbances for local residents. There are already numerous student accommodations in and around Camden area and not enough housing for those who actually live in the area / Camden. 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 and overall streets and area in general. 4. 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) 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. 5. 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. 6. Poor infrastructure, over stretched local services, less quality public open spaces and worsening of local wind conditions; <p>What with Camden Goods Yard, Juniper Crescent proposal, this proposal and other recent developments that have gone up or due to go up - How has Camden Council looked into supporting it's infrastructure, to support it's schools, GP's, Dentists, open spaces that are already overly stretched impacting on community who live here.</p> <p>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</p>

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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 works for the community, not just for developers. Local residents will have to live with whatever gets build for decades to come, including its impact on our health and quality of life.

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2024/0479/P	Andrej Mccava	05/04/2024 17:18:17	OBJ	I object to this planning application on the following basis:

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.

 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 message
 The 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(CG4) – Development and Design Principle (d)

 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 is the easiest layout to pack in as many rooms as possible, maximising corporate profit at the expense of the local community's assets.

It is suggested that the design is revised to be less dense and less tall in order to avoid harming these significant heritage assets.

 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) ranging in height from 6-12 storeys. This is significantly out of keeping with the character of the area and would result in a dominant and overbearing wall of buildings that would visually overwhelm the 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 meets 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,

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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:

 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
 Camden Draft Local Plan 2023 - Policy A1 A (i); 13.4; 13.9

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 workspace, meaning that any potential impacts to

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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 a 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;
Camden Draft Local Plan 2023 - Policy A1 - 13.8;

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 minimums;
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.

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Equality Act 2010

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

The only notable design-led contribution to the local community are marginally enlarged public open spaces on Chalk Farm Road. However, these spaces suffer from a series of design faults resulting in poor quality public realm:

1. They will receive poor sunlight levels
2. They are located against a busy road
3. The eastern pocket of public realm is used for bin storage
4. The wind microclimate report submitted with the application demonstrates that the proposed public seating adjacent to the Roundhouse will actually be uncomfortable to use for sitting, due to strong winds resulting from the development of 4 closely spaced towers

Furthermore the wind microclimate on Chalk Farm Road 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 unpleasant for sitting, and certain areas unpleasant for standing still.

The proposed application and the resulting wind microclimate should be assessed against conflicts with the following policies:
Camden Local Plan 2017 – Policy A1 (a) (l); 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 and dominant 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 corporate profit margins. Local residents will have to live with whatever gets build for decades to come, including its impact on our health and quality of life. I urge you to take some more time to get this right.