

Application No:	Consultees Name:	Received:	Comment:	Response:
2024/0479/P	Andrej Mccava	27/06/2024 15:33:16	OBJNOT	Post-application Amendments to the Scheme:

The proposed changes to the scheme since the original application are mostly cosmetic in nature and do little to address the community's previous concerns. The proposed affordable housing tower has in fact increased both in width and in height, which is likely to further exasperate issues highlighted by local residents and community groups, such as an overbearing presence on the street scene, reductions to light levels of neighbours' homes that fall below recommended guidelines and heritage harm to the Roundhouse.

The applicant has mostly concentrated on refining architectural details and exploring intricate façade solutions whilst INCREASING the proposed density, already highlighted as too much for the site during the last consultation. This will ultimately create a low quality of accommodation for new residents and negatively impact the quality of life of existing neighbouring residents. A lovely expensive façade means little when it encloses dark and overlooked rooms, and when it turns neighbours' homes into dark and unhealthy spaces. The decision to focus on the façade detailing rather than improving living conditions shows a disconnect between the priorities of the project team and the reality of life for local residents.

Summary of Consultation Responses:

It is noted that the applicant's summary of consultation responses argues against any meaningful changes to the scheme, which would be required to address the vast majority of the issues raised by the community. Taking this approach a step further, the summary of consultation responses appears to completely ignore issues raised by the community regarding:

1. Poor quality of accommodation within the student rooms
2. Poor quality of public realm

Camden Design Review Panel:

It is worth noting that a FOI request has recently revealed that Camden's Design Review Panel (DRP) reviewed the scheme twice.

The first DRP advice letter from August 2023 outlines similar concerns to the ones raised by local residents and community groups. The DRP's concerns included:

- too much accommodation for the capacity of the site (similar to objection point 2 below),
- concerns about the quality of student rooms, particularly those located at the junctions between towers (similar to objection point 4 below)
- concerns about the quality of the public realm (similar to objection point 5 below).

The scheme was reviewed by Camden's Design Review Panel for a second time in January of 2024, where a number of these concerns were re-iterated. The advice letter states:

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'The panel previously suggested that a student housing block should be removed to create more space on the site, but this has not been followed. As a result the site remains overcrowded, placing pressure on the constrained public realm.'

(similar to objection point 2 below)

and

'The panel also continues to think that further lowering the nine-storey building closest to Chalk Farm Road would reduce its impact on the public realm, and help to prevent it feeling overbearing beside the pavement. It asks the applicant to continue to explore this option.'

It is disappointing then to see that so little progress has been made on some of these key issues, which were already highlighted by Camden's Design Review Panel almost a year ago. In fact the scheme appears to have regressed – it now proposes more accommodation and more building height than what Camden's DRP already flagged as an overcrowding of the site last year.

The London Plan 2021 calls for optimising the capacity of sites via a DESIGN LED approach. Since a panel of design experts has repeatedly highlighted that the proposed accommodation would constitute an overcrowding of the site, it is difficult to argue that the site capacity has been optimised or that a design-led approach has been taken. The site is actually overcrowded and a profit-driven approach has been taken. This has been done at the expense of the local community.

Community Engagement Failures:

The community engagement regarding this crucial scheme has been poor. The developer's consultation website asks for people to subscribe to a mailing list if they want to be kept updated on the progress of the proposal. However, no updates have been sent to subscribers to inform them that the scheme was submitted for planning, nor that it is out for re-consultation. People cannot be reasonably expected to check Camden's planning website for updates constantly. If one signs up for updates on the developer's website, one normally expects that they will be notified when the scheme in question is in for planning. This has not been the case, nor has the developer's consultation website been updated to reflect that the scheme is in for planning. These failures to maintain a basic level of communication, coupled with the timing of the re-consultation (coinciding with a general election) have ensured that opportunities for the community to meaningfully engage with this proposal have been minimised. Any silence from the community during this second round of consultation should not be taken as an implied approval of the latest revisions. It is merely a reflection of the communication and engagement strategy outlined above.

Objection:

I once again object to the scheme based on the following:

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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 newly amended scheme proposes a wider and taller affordable housing tower, which is likely to ensure even worse heritage harm.

The proposed application and the ensuing harm to heritage assets conflict 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)

2. Overbearing scale and height of the proposal that is out of keeping with the character of 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 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. 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 latest revision has increased the width and the height of the affordable housing tower, which will compound the issues outlined above. Furthermore, the submitted plans indicate a newly proposed 'crown' at roof level with some indicative plant drawn on the roof plan. This is effectively an additional storey and will create an even more overbearing presence on the street scene and be even further out of keeping with the character of the area. The approach of labelling this plant level as a 'crown' is misleading and should be challenged.

The scale and height of the proposals conflict with the following policies and guidance:

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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, or the latest updates to the scheme which include a wider and taller affordable housing tower. Considering the fact that the proposed development would already drop light levels to below recommended limits, it is crucial that these elements are included in the calculation, as they will be blocking the little light there is left. I would also like to note that I have repeatedly tried to engage with both the developer and Camden's officers regarding the issues outlined above and have been met mostly with silence.

The latest revision has increased the width and the height of the affordable housing tower, which will compound the issues outlined above. Furthermore, the submitted plans indicate a newly proposed 'crown' at roof level with some indicative plant drawn on the roof plan. This is effectively an additional storey and will block out even more light to neighbouring residents. This has not been taken into account, and the actual impact to daylight and sunlight of residents is likely to be even worse than indicated.

It is unacceptable to be subjecting existing neighbouring residents to such unhealthy living conditions which are proven to cause a variety of medical issues. 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 conflict 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

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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 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 loss of privacy of neighbouring residents 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 conflicts with the following policies policies and guidance:

The London Plan 2021 – Policy D6 (D); Table 3.2 (iii)
Camden Local Plan 2017 - Policy D1 (n); 7.32

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

The only notable design-led contributions 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

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2. They are located against a busy road
3. The eastern pocket of public realm is used for bin storage

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 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, suffering from poor internal light and extreme overlooking. The slightly enlarged public realm would suffer from poor light levels and worse wind conditions than present. Finally, the affordable housing provision is still quite low, particularly considering the extreme density of the development. With all of 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. It is certainly difficult to see how one could argue that this is SUSTAINABLE development, when it will cause so many issues for the community and future residents.

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.

You should take some more time to get this right, as was done with the extremely successful Hawley Wharf development, where Camden Council insisted that the developer goes back to the drawing board, at the behest of the community and local experts. Some of those same local experts are now objecting to this scheme. Listen to them. In the case of Hawley Wharf, the planning committee listened to the local community and took a stance in our interest. This resulted in a universally acclaimed and highly successful piece of city. The same can happen here, provided Camden finds the courage to do so again.