

Planning Department
London Borough of Camden
2nd Floor, 5 Pancras Square
c/o Town Hall, Judd Street
London WC1H 9JE

2 April 2025

Dear Sirs

33-35 Jamestown Road, London NW1 7DB and 211 Arlington Road, London NW1 7HD (the "Site")

We act for The Jamestown Collective, which consists of a number of concerned neighbours and businesses close to the Site (annex 1).

On behalf of our client, please take this letter as a formal objection to the proposals for the Site under reference 2024/4953/P (as amended in March 2025) for "*Demolition of existing buildings and structures to facilitate redevelopment comprising a Purpose Built Student Accommodation (Sui Generis) block over the basement, ground, plus five storeys and sixth floor plant room with flexible commercial (Class E) on the ground floor and a residential (Class C3) block over the ground plus five storeys, each block has two private courtyards with hard and soft landscaping, cycle parking, and associated works*", (the "**Application**").

Our client has a number of very significant concerns with the Application.

1. Student accommodation

1.1. The Council's policy H9 in its 2017 Local Plan states that:

We will seek a supply of student housing to meet or exceed Camden's target of 160 additional places in student housing per year and will support the development of student housing provided that the development: a. will not involve the net loss of 2 or more self-contained homes; b. will not prejudice the Council's ability to meet the target of 742 additional self-contained homes per year; c. will not involve a site identified for self-contained housing through a current planning permission or a development plan document unless it is shown that the site is no longer developable for self-contained housing; d. complies with any relevant standards for houses in multiple occupation (HMOs); e. serves higher education institutions that are accessible from it; f. includes a range of flat layouts including flats with shared facilities wherever practical and appropriate; g. has an undertaking in place to provide housing for students at one or more specific education institutions, or otherwise provide a range of accommodation that is affordable to the student body as a whole; h. will be accessible to public transport, workplaces, shops, services, and community facilities; i. contributes to creating a mixed, inclusive and sustainable community; and j. does not create a harmful concentration of such a use in the local area or cause harm to nearby residential amenity.

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- 1.2. The supporting text to that policy states that (a) the Council has identified sites (not including the Site) to meet over 90% of its target for student accommodation, (b) self-contained housing is the priority, (c) the Council will resist proposals for student housing that would prejudice its ability to meet the annual target for additional self-contained homes, (d) the Council supports the proposal for greater dispersal of additional student housing in the London Plan, and (e) public transport and other services that will support new student housing should have existing or committed capacity to accommodate the demand generated by the development.

- 1.3. The Council's adopted SPG on student housing states that:

Development of student housing should:

- provide for students at the area's recognised higher education institutions
- be let exclusively to these students during term-time, particularly the months of October, November, February and May
- be managed as a single planning unit
- not involve loss of existing self-contained homes or prejudice planned provision of self-contained homes

Use as student accommodation

- 1.4. The Site is allocated in the Council's emerging policy for up to 66 homes, and the latest Housing Delivery Test date (published 12 December 2024) states that the Council is delivering only 53% of its requirement. The latter must be given significant weight regardless of the policy position.
- 1.5. Specifically, the draft allocation states that the proposed use should be for employment and self-contained homes, and that:

Development must:

- a) be designed to ensure that the operation of existing, or future, employment uses on the site are not compromised by the introduction of housing;
- b) explore opportunities to create a more active and engaging street frontage along Arlington Road and Jamestown Road;
- c) ensure it relates successfully to the existing public house on the corner of Arlington Road / Jamestown Road, which is a locally listed building, and avoid any adverse impact on its continuing operation; and
- d) be designed giving careful consideration to scale and massing due to the potential impact on designated conservation areas nearby and neighbouring occupiers.

- 1.6. The Application is clearly in breach of this emerging policy. Most importantly, the proposals would remove the possibility of future employment on the Site, and would reduce the amount of housing which could be built on the Site.

- 1.7. The proposed height, bulk and massing of the Application will have an unacceptable impact on the streetscene, nationally and locally designated and non-designated heritage assets and on the amenity of neighbours.
- 1.8. As can be seen from the Applicant's HTVIA, the proposal does not relate to the locally listed public house, or to the relevant conservation areas. The sheer size of the proposals shows that no consideration has been given to the amenity of neighbours, and it is noted that the reduction in height has been generated from a desire to avoid onerous fire safety regulations rather than out of consideration for the Site's neighbours.
- 1.9. In addition, no consideration has been given to the impact of inserting an extra 200 students into a constrained and very busy area. Camden Town Underground Station is acknowledged as (and indeed frequently exit-only as a result of being) one of the most overcrowded stations within TfL's network, and the Council has repeatedly refused attempts by TfL to expand its capacity. Adding this amount of extra students, many of whom will use the station, will have a disproportionate impact on residents and existing businesses.
- 1.10. According to the SPG (appendix B), there was a 48% growth in the number of students in the relevant ward, and the SPG also notes (at appendix C) that Camden Town is one of the areas with the largest concentration of student units within the Borough. In addition, there are a number of existing student rooms in the locality, such as STAY (34 Chalk Farm Road), Homes for Students (13 Hawley Crescent), and the recently consented scheme for the same developer at 100 Chalk Farm Road with capacity for around 650 students.
- 1.11. In this context, adding a further 200 units would clearly represent an overconcentration of this type of use, which would go against one of the key messages of the SPG, which aims to *"contribute to creating [a] mixed, inclusive and sustainable community"*.

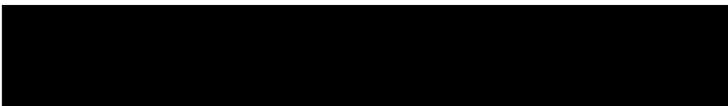
Highways

- 1.12. Another indicator that the Application represents overdevelopment is the proposed arrangements for delivery and servicing. Firstly, the quantum of deliveries to 200 units will have an unacceptable impact on the local road and parking network. Secondly, whilst the Delivery and Servicing Plan is not available online, the summary in the Transport Assessment states that a dedicated delivery and servicing area will be provided *"which will be restricted with double yellow lining"* and that this *"allows a delivery vehicle to park and service the affordable housing block in this area"*. This is confirmed in the March 2025 document which states that *"servicing will take place from Jamestown Road via the provision of an area of double yellow lining"*.

- 1.13. The Council's website states that there is no waiting allowed on double yellow lines, and the Highway Code explicitly states that "*Double yellow lines indicate a prohibition of waiting at any time even if there are no upright signs*". Given that our clients would be ticketed for waiting on double yellow lines (which is an offence under sections 5 and 8 of the Road Traffic Regulations Act 1984), allowing the Applicant to use this area for consistent deliveries would be an unfair and inconsistent approach, and such an approach would clearly be unsafe for residents of the Site and its neighbours.
- 1.14. The Applicant's updated documents state that "*Objections relating to parking and traffic are not considered to be material considerations*". This is incorrect in our view. Clearly, the impact on neighbouring amenity as a result of parking and traffic issues can (a) contribute to a breach of the Council's policy on neighbouring amenity, and (b) could be a material consideration, and in this case there will be a serious impact on neighbouring amenity and safety in breach of The Council's Policy A1.

As can be seen from the above, the Application is in breach of a number of the Council's policies, and its development plan as a whole. Permission should therefore be refused.

Yours faithfully



son Law Offices

ANNEX 1 – The Jamestown Collective

Sipiwe and Howe Gondwe - 201d Arlington Road
Susan Rice, Jethro Vickery and Jamie Moore - 203b Arlington Road
Nateesha Bussue – Flat 2, 207 Arlington Road
John Richardson – Flat 3, 207 Arlington Road
Niyazin and Niagi Tunati – Flat 6, 207 Arlington Road
Jenny Mathias - Flat 9, 207 Arlington Road
Chris McNamarra - Flat 2, 205 Arlington Road
Amal and Mo Amin - Flat 6, 205 Arlington Road
Kelvin and Jessica Connell – Flat 9, 205 Arlington Road
Ali Charlton – Flat 10, 205 Arlington Road
Trevor Wood - Flat 11, 205 Arlington Road
Haruth Selassi - Flat 12, 205 Arlington Road
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