



BCAM-BRAG, London WC1N 3XX

24 May 2025

105-121 Judd Street, London WC1H9NE

Objection to Planning Application 2025/1684/P. Variation of application 2022/1817/P

Residents have the right to ask the Council to protect and preserve their quality of life and the character of the place in which they live. This is enshrined in Camden's development policies such as DP25 (conserving heritage), DP26 (impact on occupier & neighbours) and DP32 (air quality).

The Bloomsbury Residents Action Group objects strongly to this Section 73 application due to its harmful impact on heritage and residential amenity.

The Planning Committee debated this application in September 2022.

Planning approval was given in 2023 to continue the existing commercial use of the building and with lab-enabled use that would fit with Camden's 'Knowledge Quarter' aspirations. Residents were assured that it would be data driven research in keeping with the building's original function as an office block.

The proposed use of the building as a biochemical laboratory requiring the installation of containment cabinets and needing specialist mechanical plant and waste flumes on the roof was not considered or debated by the Planning Committee in 2022.

We would like to point out the significant changes inherent in the S. 73 application.

A. Removal of the Café on the Ground Floor

The Planning Committee approved the original application in September 2022 for the following:

1. A two-storey roof extension and a new café on the ground floor.
2. Reactivation of street frontages to Judd, Thanet and Hastings Street.
3. Replacement, repair or enhancement of all paving around the site
4. Comprehensive public realm and new areas of planting and urban greening

The S.73 change means that there will be **no active street frontage** on to Judd Street.

The café was also intended to be **a public benefit**, thereby adding to the vibrancy of the building at street level; and welcoming the community into a commercial building.

Local food and beverage businesses have benefited from the closure of Judd Street to through traffic (eg Nonos and Half Cup in Judd Street; Sandwich Street Kitchen in Hastings Street). The Covid pandemic – which created a reluctance to socialise – has ended. The arrival of an additional café at 105 is now unlikely to threaten existing business. Camden has been promoting streateries in the borough, and with reasonable licensing hours, a cafe would be welcome.

Improvements to the public realm would have worked well with a new café spilling out on to the Judd Street pavement, thereby doing what was anticipated: **reactivating the street frontage**. Instead, the building will be turning 'inwards' to focus on its biochemical research activities; the current entrance will not be in use and the NE corner entrance is to be opened, with a ramp providing accessibility.

We object to the loss of café on the ground floor and consider it a major change to the original application and a disbenefit to the local community.

B. Change to a containment level 2 laboratory for biochemical experimentation

105-121 Judd Street received planning permission for:

5. A two-storey roof extension
6. Rooftop plant containing general mechanical and ventilation layouts suitable for a commercial office setup

The rooftop plant is considerably different to that which was approved at Planning Committee, with the **addition of five chimneys that will rise three metres above roof level.**

There was no reference in the original application to even the possibility of flues on the roof; there was no mention of the potential for Level 2 containment cabinets within the building. None of this was discussed and debated by the Committee who approved the original application.

The changes have only arisen because the developer has identified a prospective tenant, who wants a specific fit-out of the building – **to the detriment of local residential amenity.**

There is no guarantee of safety or any specific information provided as to the experiments that will be carried out by the current prospective tenant (LifeArc) or any **future tenant** who might occupy the premises.

C. Change that will impact on health & safety of nearby residents

In correspondence with Neil McDonald, Camden's Team Manager responsible for planning applications in Bloomsbury, we were told that "Central London and the borough of Camden already accommodate many secure laboratories in hospitals and university buildings of containment level 2."

Yes, **in hospitals and university buildings**, NOT immediately next door or opposite residential dwellings, as proposed here.

LifeArc currently have scientific research facilities in the Bio Quarter campus in Edinburgh and the Catalyst Bio Science campus in Stevenage. They use labs within the Francis Crick Institute opposite St Pancras station on Midland Road - where prevailing winds disperse particulates above the adjacent railway track complex and cement works. This means they are doing their research in places **dedicated to bioscience**; not in streets where a large number of people LIVE. It is totally inappropriate to relocate these facilities to 105-121 Judd Street.

In terms of deliveries, a biochemical chemical laboratory has very different requirements to that of a normal office block. A new bridge is proposed over the existing lightwell on Thanet Street, along with a new entrance – specifically for a LN2 gas store & delivery. Liquid nitrogen is both useful and hazardous. There are residents living **immediately next door** to where such items will be delivered. Unintentional accidents can occur.

Native Land (the developer) organised a meeting between members of the community and LifeArc. This took place several weeks ago. One of the community's requests was for LifeArc to identify a similar laboratory in a residential area, so that we could ask neighbours of this research facility what it was like to live immediately next door. In other words, to learn from real experience. But we could not, because – to date - no information has been forthcoming.

We object to the development of biochemical laboratories at this location as it will have a harmful impact of the neighbouring residential community.

D. Changes to sustainability benefits

At the Committee meeting in September 2022, 105-121 Judd Street received planning approval for:

7. A low carbon refurbishment and extension by retaining and reusing the existing building
8. An attractive refurbishment of an existing Bloomsbury building, through the cleaning and repair of the exterior of the existing building, and repair and upgrade of existing building.

It is no wonder the Committee granted approval – this sounds like an admirable, sustainable project.

The reality is that 75% of the exterior has perhaps been retained but **the entire interior**, including the unusually high floor levels (which we were told they prized so much) has been demolished. The building has been gutted. As for the windows, some will now be infilled and new louvres are proposed to fulfil the potential tenant's requirements. It was utterly misleading and economical with the truth to claim that the existing building was to be 'retained and reused'.

Although there's a Community Liaison Group and reasonable communication between the contractor and local residents, the excessive noise and disturbance from such extensive demolition has caused huge disturbance and distress to neighbouring occupiers.

The original application did not include significant structural changes beyond rooftop extensions. The new application requires an extension of the southwest stair core and the addition of a bridge link over the lightwell to improve internal circulation.

E. Impact on heritage

105-121 Judd Street lies within the Bloomsbury Conservation Area. The original (approved) design of the former RNIB has already altered the roofscape of the charming Edwardian building. The turret on the NE corner will be much less visible as an architectural feature, merging into the facade of the two-floor roof extension.

We are told that the proposed chimneys which will extend 3 metres above the roof will have minimal visual impact from the street. But they will certainly be visible to residents who live in adjacent mansion blocks and the students and summer visitors who occupy rooms in Hughes Parry Hall in Cartwright Gardens.

Creating a Level 2 containment laboratory at 105 Judd Street will basically change forever the character of this part of the Conservation Area.

Historic England wrote in response to the original planning application: *"The historic scale of 105-121 Judd Street as built in the 1900s and 1920s responded sensitively to that of the Georgian townscape which characterises the Bloomsbury Conservation Area....By substantially increasing the size of historic buildings set within the Bloomsbury Conservation Area in order to accommodate demand for development could bring a lot of incremental change to its character and appearance such that it would risk cumulative harm to its significance."*

With the approval of two additional floors, the 'incremental change' has already begun. And now there is a proposal for "an additional 7th storey for roof plant" [description of development site in Odour Report]. The building's height will be increased further with five 3 metre chimneys.

Camden Council's policy [DP25] reflects the broader principle that development should not negatively impact the character and appearance of conservation areas, including the setting of listed buildings, unless there are compelling public benefits to outweigh the harm to heritage assets.

There are 25 Grade II listed buildings situated **immediately adjacent** to 105 Judd Street: the two-storey terrace of 17 houses on Thanet Street and 8 three-storey houses on Judd Street. With the loss of the Café (a public amenity) and NO reactivation of the street frontage on Judd Street, combined with the potential negative impact of biochemical laboratory facilities on residential amenity – ***where are the compelling public benefits to outweigh the harm to heritage assets?***

Conclusion

We are aware that LifeArc currently have an office in Lynton House, Tavistock Square. We know they do valuable research work that will provide long term health benefits to us all.

We would have no objection to their office presence at 105-121 Judd Street. This would be an appropriate use of the building, especially if it included a café (as per the original application) as this would enable local people to mingle with LifeArc's staff in a co-supportive manner.

But we object strongly to the principle of turning any part of 105-121 Judd Street into a biochemical laboratory.

In addition to the harm on residential amenity and heritage, the development of a biochemical laboratory in a dense, residential neighbourhood will create a harmful and unwelcome precedent.

Postscript: Conditions

Should the Planning Committee be persuaded that a specialised, research-focused facility with the potential to emit toxic waste is appropriate in this residential location, then we insist that the developer and Camden Council provide the community with **clear levels of protection**.

It is imperative that sensible provisions and precautionary restrictions are applied as conditions **BEFORE** planning permission is given.

It is important to remember that no resident has located to this specific neighbourhood with even the slightest expectation that it would be blighted by any form of gaseous waste being distributed into the air they breathe. They may know about the proximity to the Euston Road and the poor quality of air from traffic emissions – but this is a different form of pollution.

The Council is taking air quality seriously and Judd Street lies within Camden's Clear Zone. Policy 32 states that "We will use planning conditions and legal agreements to secure Clear Zone measures to avoid, remedy or mitigate the impacts of development schemes in the Central London Area."

'Clean Air for Camden' is the Council's vision for a borough where no person experiences ill health because of the air they breathe.

Pollution from through traffic in the neighbourhood is now much reduced and Judd Street is well used by cyclists and pedestrians.

The Argyle Primary School lies a short distance from the proposed biochemical facility at 105 Judd Street. Children's health has benefited from the massive reduction in local car traffic, and it seems inconsistent to now introduce the potential of harm from gaseous waste being dispersed into the air nearby.

LifeArc (the proposed tenant) is both a charity and a company which benefits from vast royalties earned by drugs such as Keytruda (a cancer drug), Entyvio (a Crohn's disease treatment) and Actemra (an arthritis drug). These have all been developed by LifeArc and are sold by partners such as Merck, Roche and Takeda. We are told these royalties are used to fund further research and develop new drugs. That's great - but it also means we don't know what new drugs may be developed **in the future** or the processes applied to develop them.

Such processes could involve toxic materials such as pathogens and poisonous solvents like benzene which must be treated or sanitised in some way before they are released as waste gaseous material such as Volatile Organic Compounds, Formaldehyde and Acid Vapours which can cause serious health issues and cell damage to humans through the air we breathe are an additional concern.

Current legislation – and there's a lot of it from multiple sources - is largely retrospective in effect.

It is necessary to ensure that the use of dangerous and toxic materials is prohibited (now and in the future) from being discharged from the roof top chimneys at 105 Judd Street.

Independent air quality consultants must advise on the installation of appropriate equipment to monitor gaseous discharge, and the tenant must be forced to report potential risks on a continuous basis to eliminate any risk of accidental discharge before it happens.

The community must be knowingly protected from both noise and the discharge of any unpleasant gaseous material.

Equipment can fail. Sensible safeguards must be provided as reasonable precautions. The Section 73 application makes no mention of these safeguards.