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planning application on three grounds: in a densely populated residential area Bloomsbury Conservation area. The ch include flues for the elimination of gase unpleasant, and risk causing harm to th considerable number of the residents in years: the quality of their life, and then former Salvation Army premises as a li Camden's Knowledge Quarter are hou or universities, and not in close proximi an outstanding example of urban plant distinctive and attractive feature of this built c. 1812 - 22, are, according to the example of a street of workmen's cotta the ground floor and basement " etc. inappropriate. The mass of the propose	e than 20 years, I am objecting in the strong: (a) health and safety; (b) inappropriatenes a; and (c) detrimental changes to the towns thanges to the original application are signification waste, which is potentially dangerous the health and well-being of residents living in the immediate neighbourhood have lived nature of the community will be affected by life sciences laboratory. Other research facinated in more appropriate environments such inity to housing. (c) The Bloomsbury Conservaning, and the row of small houses in Thanes is historic neighbourhood. These Grade II listed Survey of London (1952) "an early and picture ages. Though small in size, having only one at the control of the development as now envised new development, now even bigger than diamount of plant and flues on the roof, will of the control of the development and the roof, will of the control of the control of the roof, will of the control of the control of the roof, will of the control of the control of the roof, will of the control of the control of the roof, will of the control of the control of the roof, will of the control of the control of the roof, will of the control of the control of the roof, will of the control of the control of the roof, will of the control of th	s of the facility cape of the cant. (a) They and nearby. (b) A here for many the use of the lities in as hospitals vation area is t Street is a ted houses, cturesque storey above saged is a originally	

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2025/1684/P	Debbie Radcliffe	Top flat 91 Judd Street WC1H 9NE	25/05/2025 15:52:26	ОВЈ	As a permanent resident of Judd Street, and near neighbour of 105-121 Judd Street, I object to the Section 73 application which has been submitted by Native Land, simply to satisfy the needs of one specific tenant.
					The application site lies in the Bloomsbury Conservation Area. Despite Historic England's concerns in 2022 about the incremental impact of additional height and bulk at this location, permission for the two-storey roof extension was granted.
					As a member of the Bloomsbury CAAC, I have recently commented on the negative impact of telecommunication equipment on a heritage roofscape. The Senior Planner with whom I corresponded was in agreement, saying: "I completely agree that rooftop locations for development, including telecommunication equipment, can be sensitive."
					This S.73 application calls for an increase in both the plant enclosure and the plant itself and adds five 3-metre-high chimneys to the rooftop of 105-121 Judd Street. As the building lies immediately adjacent to two terraces of Grade II listed buildings, and opposite mansion block buildings identified as Positive Contributors to the Conservation Area, this should certainly be regarded as a "sensitive" location.
					Although Native Land have kept some of the exterior historic fabric, the changes proposed in this S. 73 application will impact on the character of the immediate neighbourhood, especially the adjacent listed buildings. The changes will also seriously impact on residential amenity. They include:
					<ul> <li>Extension of plant enclosure at roof level and increased plant within the building (this will increase the level of noise nuisance for adjacent neighbours)</li> </ul>
					<ul> <li>New flues at roof level for lab tenant extract cupboards, extending 3m above the plant</li> </ul>
					<ul> <li>enclosure at roof level (this adds a visual intrusion to the roofscape)</li> <li>New louvres in existing openings at lower ground, ground, and first floor levels (changes to the windows which were part of the retained historic fabric)</li> </ul>
					Extension of southwest stair core to provide means of escape at fourth & fifth floors (new structural addition)
					Bridge over existing lightwell & new entrance to serve LN2 gas store & delivery on Thanet Street (structural addition to the building. NB unintentional accidents can occur – this is of huge concern to neighbouring residential occupiers)
					Extension of goods lift to serve first and second Floors with overrun into third floor for 'White coat' BOH lab goods circulation route separate to FOH lifts in core 1 - windows in south elevation infilled to accommodate (changes to retained historic fabric.)
					All these physical changes emphasise the unacceptable change from an office-based building to a building focused on industrial laboratory requirements.
					Lab-enabled office space (for which the original application received approval) is not the same

as designing laboratories for biological and chemical experimental research.

Two floors of laboratories will be apparently used to develop humanised antibodies and small

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					chemical products requiring fume cupboards, flues, and a large plant on the roof to remove the toxic waste. This is a far cry from the data research laboratory activity that residents were informed would take place in the building at the time of the original planning application.	
					Although we are told these laboratories will only be used for research projects, it is clear from the LifeArc website that they do prepare them for pharmaceutical companies, which in turn suggests a highly successful and well-funded commercial operation, despite the charitable status of the company.	
					105-121 Judd Street started life as a purpose-built office for the Salvation Army, which was later taken over by the RNIB. Its purchase by Ashby Capital and Montrose Life (Native Life) in 2021 started a new chapter for the building.	
					The problem is their choice of tenant. It is the choice of this specific location for a biochemical laboratory, not LifeArc's research credentials, that has caused such distress amongst immediate neighbours.	
					By stopping through traffic in Judd Street, Camden have indeed done their best to reduce the damaging fumes from vehicles, so it seems inconsistent to permit a different type of fume - which may be safe, but how can we be sure what will happen in the future, with possibly a different owner, a different tenant and perhaps different research aspirations?	
					On Ashby Capital's website one can read about their aims for the building, now renamed KOVA KX: "the Edwardian facade masks the internal innovation."	
					105-121 Judd Street lies in a dense residential neighbourhood. It is neither a university campus nor a hospital complex. It is where people have their homes. We do not wish 21st century re-development to undermine our quality of life. What really will be happening inside the building? Use of the word "mask" does not inspire confidence.	

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2025/1684/P	Trevor Shonfeld	91 Judd Street	25/05/2025 15:37:11	OBJ	25 05 25 Objection to 105 Judd Street application 2025/1684/P S73 revisions
		WC1H 9NE			OBJECTION In recent discussions regarding the future of 105-121 Judd Street, there has been significant controversy surrounding the proposed changes to the building's use. 2022/1817/P originally granted permission as an office building with laboratory services, the new application seeks to transform it into a laboratory with offices and meeting rooms to accommodate the specific needs of a company called LifeArc. This proposed shift has raised many concerns among local residents and stakeholders.
					I object to this application on the grounds that,-  1. The change of use that has been intermingled within this amendment application should be refused. This is incorporate to an \$72 application.

- refused. This is inappropriate to an S73 application.
- 2. It is wrong to discharge any levels of gaseous waste directly into a residential environment.
- 3. The original application to provide a Judd Street facing café was seen as an important residential amenity. It should be retained.
- 4. The addition roof top plant has increased overall height by adding 5 x 3m waste flumes. This is wrong in a heritage area.

## **ISSUFS**

It is important to recognize the potential impact such a change could have on our community. The proposed use of the building suggests a greater emphasis on industrial-scale operations, which is a stark departure from the initial designation. This shift not only alters the intended purpose of the space, but also introduces potential environmental and social ramifications that cannot be overlooked.

It is contrary to Camden's Policy to add to air pollution.

Camden Clean Air Strategy 2019–2034. This is Camden's commitment to achieving the World Health Organization's air quality guidelines by 2034. It addresses both outdoor and indoor air pollution, emphasising the need for collaborative efforts across various sectors to reduce emissions and protect vulnerable populations.

Camden Clean Air Action Plans: The 2023-2026 Plan builds on the prior plan to continue the collaborative approach, focusing on 36 specific 'Clean Air Outcomes' across seven key themes, including reducing emissions from buildings, transport, and construction, as well as enhancing public awareness and indoor air quality and specifically to reduced emissions from other sources of outdoor air pollution, Commercial buildings are the main source of air pollution in Camden, contributing about 47% of NO2 emissions and 51% of PM2.5 emissions in the borough. (Camden web site: 2024)

To grant planning permission to this application that brings with it any increase in air pollution is wrong. The application should be firmly refused on this issue alone.

This specific quarter of Bloomsbury is predominantly a high-density residential neighbourhood,

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with academic, healthcare institutions and commercial retail taking second place. The prospective tenant LifeArc is seeking to change office use into what is much more of an industrial operation.

Furthermore, it is disingenuous to wrap this particular application under the 'Knowledge Quarter' banner or of it being simply innovative medical research couched in 'charitable good purpose' terms.

LifeArc is an MRC spin-out that makes make much of its charitable associations. But the reality is that this is part of a money machine that, through third party distributors, aggressively markets and profits from the sale of drugs to cancer patients and others. LifeArc's 2023 filed accounts show that income and endowments, including royalties, exceed £169 million. Stephen Maikovsky, CFO and acting CEO received a salary and benefits of over £417,000. Not only is LifeArc interwoven with a 'for profit' enterprise in its own name, its products, spearheaded by the cancer drug Keytruda, is marketed by one of the most aggressive pharmaceutical enterprises in the world – Merck, a US pharmaceutical company. Last year, Merck's own accounts report 2024 global sales for Keytruda in excess of \$29 billion.

In 2018, the list price for a course of Keytruda treatment in the UK was in excess of £84,000 per patient. NHS England then struck a confidential arrangement to allow NICE to recommend it for UK patients. Keytruda (drug name is Pembrolizumab) is now routinely available on the NHS. In 2024. NICE reports that the list price of pembrolizumab is £2,630 for a 100 mg per 4 ml concentrate for solution for a just n one single infusion vial.

It is therefore misleading to favour LifeArc as 'a worthy cause' when in fact it is an integral part of a massively successful commercial enterprise.

I further object to this Section 73 application in that ,-

- 1. It significantly changes the permission granted for an office building with laboratory services, to a laboratory with offices and meeting rooms, simply to suit the needs of a prospective tenant.
- 2. The application proposes that the Applicant should be permitted to emit gaseous waste into a residential environment that is completely unfamiliar with such practice. This would be a shock move on any community. It is incautious and betrays the trust between residents and the council. This application must be refused
- 3. The purpose for the building and plant required for this use is so different from the original application that surely this requires a full review of a new application.
- 4. It would be wrong to permit an industrial process in the heart of a residential community. Where is the precedent for this?

The application should be refused in its entirety.

Trevor Shonfeld Resident 91 Judd Street WC1H 9NE

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2025/1684/P Steph	Stephen Cowan	116 Thanet House Thanet Street London	23/05/2025 17:10:29	OBJ	I am deeply concerned at the prospect of having bio research labs juxtaposed to some homes and in very close proximity to others in a densely populated residential area.
	WC1H 9QE	WC1H 9QE	residential accommodation.)  Via the Camden Planning website, I have seen the value the developers to support their application. Of these 25 provides a figure 4.1, underneath which it states residential properties are all located outside of the 1	(The prospective tenant's, LifeArc's, Stevenage labs are on an industrial park well away from residential accommodation.)	
					Via the Camden Planning website, I have seen the various technical reports commissioned by the developers to support their application. Of these, the Odour Impact Assessment on its page 25 provides a figure 4.1, underneath which it states (confusingly) "It can be seen that no residential properties are all located outside of the 1.0 OU E /m3 odour contour line". However, if that contour is the blue line in the figure, then it is clear that there are many residential properties within its boundary.
			The most concerning aspect is the risk, however remote, of toxic emissions. Therefore, if the Council were minded to grant this application, which I hope it is not, I suggest that, for the protection of the public and ultimately its own reputation, it should:		
					(i) commission its own independent assessment of such risk,
					<ul><li>(ii) ensure that, once the tenant is operating from the premises, there is independent monitoring of discharges and</li></ul>
	(iii) subject the application to scrutiny by the full Planning Committee.		(iii) subject the application to scrutiny by the full Planning Committee.		

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2025/1684/P	Sandy Solomon	Flat 131 Thanet House Thanet Street WC1H 9QE	26/05/2025 22:02:34	ОВЈ

## Response

I am the owner of 131 Thanet House, almost directly across Thanet Street from 105-121 Judd Street. I am writing to object, in the strongest possible terms, to the proposed amendment to the planning permission extended for the development project there. There are a number of objections, both substantive and procedural.

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- 1) To take the procedural first. Having been granted permission for a building for one use, the developers now want approval for a very different use. The shift - from data-driven intellectual activity to active, lab-driven biochemical research—would involve the construction of an additional level, a seventh- story roof plant with five three-metre high chimneys that would not only be ugly to see (and not at all in keeping with the architecture of the building), but would result in even more reduction of light to neighbouring residences. The use would also involve production of a bio-chemical waste, about which more later. These changes are not trivial, but rather fundamental changes to the original plan, and therefore a matter for the full Planning Committee, where community objections can be made and heard in the light of day. For the changes to be waived through like this, to say the very least, risks the extremely unfortunate impression that the company knew what it was doing all along (it has, after all, been advertising the building as "lab ready," as containing a 60:40 split of lab to office space that was not in the original planning application) and the impression that the Council may have been facilitating, if not colluding in, this deceit. It also creates something of a precedent, a path through Camden planning procedures that other companies might follow in the future. The proposed changes to the plan represent significant, indeed fundamental alterations, not mere amendments to the initial proposal, not "minor material changes." The changes involve a massive increase of the plant on the roof and 16 level II "safe container" cupboards to remove toxic waste generated by two floors of labs. The proposed changes should go back before the full Planning Committee for consideration. This is a matter for renewed consideration and deliberation, for public disclosure and discussion.
- 2) To turn to the substantive issues, the building as "reimagined" would emit biochemical gases and possibly particulate matter, into the neighbourhood air. The higher "flues" required to avert the worst consequences of these emissions, would sit on top of a seventh-floor plant that would block even more light from the surrounding residential buildings and would substantially change the profile of the building. All of which would represent a further assault to the stated purposes of the Bloomsbury Conservation District, its human-scale and mixed-use development. The community south of Euston Road is a residential neighbourhood where even multi-family residential buildings are of moderate height, where most houses and shops are only a couple of stories high. This part of Bloomsbury is not full of high rises. The building, 105 Judd Street, does not abut Euston Road and is fully within the residential area that was designed for conservation.

It is far from clear that the Council would be able effectively to monitor the nature and extent of the pollution generated by this building, since emissions would vary from day to day. Release of odours, while a constant imposition on neighbours, would be the least of the prospective problems. Toxic air is the real threat. The proposal alleges that because active research is conducted at nearby "hospitals" and "university buildings," the proposed changes will be nothing extraordinary for the area. The argument does not take into account the location of this building, nestled as it is right next to the flats and houses and small businesses that comprise the Bloomsbury Conservation Area. People are living all around this building unlike the other

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					buildings in which bio-chemical labs operate. The argument that just because this sort of pollution already takes place down the street, we should allow more of it here also seems an extraordinary one. I, for one, do not want to have potentially toxic gases and possible particulate matter belched out across the street mere feet away from my window—all the worse in summer when the windows much be open for ventilation and temperature regulation. This use represents a threat to our health and well-being, from which threat the planning bodies should be protecting us.		
					Further, there is no reason why this sort of research should be located here, in the minal university or hospital campus, but of a residential neighbourhood in central London.		
					I understand that developers assume certain risks when they decide to invest so hear transformation of buildings on this scale. If developers' initial projected tenants have f through or they think they can extract more revenue from this (transformed) use of the pis: that is a matter for them and not the Council. It is certainly no reason why consider added risks and potentially crushing damage should be inflicted on those living aroun. The developers should look for alternative tenants and stick to the plans as first approximately camden should reject this application.	fallen ne site, tant derable nd the site.	