

Planning Application Details

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Your comments on the planning application See attached PDF document

[Planning Objection - 2017_3847_P](#)

About this form

<i>Received on</i>	04/09/2017
<i>Form reference</i>	21045445
<i>Status</i>	Submitted on 04/09/2017 21:19
<i>Contact method</i>	Self service
<i>Type</i>	Comments on a current Planning Application

PLANNING APPLICATION 2017/3847/P

I wish to offer my objection to this proposal as laid out below.

As a resident of Gilbeys Yard, I feel this development will cause considerable harm to myself and fellow residents. Firstly, with reference to the privacy to habitable rooms at the rear of Gilbeys Yard. Several of the windows in the proposed development are with the 18m guideline of opposing residential windows at the rear of Gilbeys Yard. As this northern side of Gilbeys Yard consists almost entirely of bedrooms, adherence to the 18m guideline is most important and should not be compromised. For example:

Block E1 Levels 1-4 living room windows and corner terraces range within 10-14m with Level 5 upwards bedroom windows being within 11m.

Block E2 rear living rooms are within 15m.

Block E2 rear landing windows are within 15m and are not shown as frosted.

It is also of great concern that Block E1 at 11 storeys high is sited so very close to Gilbeys Yard. In fact it is an overwhelmingly commonly held view that the general height of this proposal, not just the very tall Blocks A, C and E1, is far too tall, dominating all that surrounds it.

With reference to the single storey unit at the south end of Block D. This unit has been designed to be sacrificial should a future development of Gilbeys Yard creates a wider route connecting through to Oval Road. Whilst this is understandable the fact that this unit has been designated as a retail unit is grossly unfair to the residents of GY, especially those whose properties directly neighbour the alleyway through to Oval Road. Please bear in mind that all these properties have north facing bedrooms that would directly face and/or overlook this large retail unit. In view of this, I feel it is unacceptable to allow this unit to be retail in nature and should be changed to a more benign use and subsequently be more neighbourly.

I also note that the communal bin stores for Blocks D and E1 have been placed at the point where they are as close to Gilbeys Yard as is possible. Whilst I am sure this is great for future residents of Blocks D and E1, it is unfair and quite frankly disrespectful to the existing residents of Gilbeys Yard.

Moving on, I strongly feel that the developer has misunderstood how access to the site will actually manifest. The number accessing the site via the Gilbeys Yard alleyway will be far greater than the developer suggests. Leaving the 'car-free' site by this route offers many advantages over leaving via the Chalk Farm Road route by the petrol filling station:

The alleyway route is the quickest route to Camden Town station. Camden Town offer more options than Chalk Farm station as well as being far more accessible by way of being escalator based rather than elevator based.

The choice of bus routes from Camden Town and the immediate area are far greater than those available from Chalk Farm Road and Chalk Farm station. In fact, virtually all bus routes that service Camden stop at one of the Camden Tube bus stops.

Cycles will logically favour this entrance over the junction on to the hazardous Chalk Farm Road – it will take them on to the relative safety of Oval Road and beyond into the popular cycle routes around and through Regents Park.

Furthermore, considering that this route is at the southern end of the site it will also be a far more popular walking route than the developer suggests. This is the natural route down to Euston, Kings Cross, Oxford Street and so on.

The disturbance to the residents of Gilbeys Yard will be considerable and unacceptable.

The situation worsens when you consider non-resident vehicles accessing to the site, by which I mean taxis, delivery vehicles and fast food deliveries. Especially when considered in conjunction the position of the concierge office within Block E, directly alongside the Gilbeys Yard alleyway.

In the case of taxis, it is totally illogical that someone taking a taxi from or to the south would choose to sit in the slow moving traffic on Camden High Street and then Chalk Farm Road to enter or leave the site. Please bear in mind that the traffic will be even slower than it is now (as admitted by the developer as a consequence of the redesigned junction at the petrol filling station – something I will return to later). It would be quicker and result in a cheaper fare to begin or end the journey in Gilbeys Yard. Gilbeys Yard will become a taxi rank for Camden Goods Yard which is totally unacceptable.

An obviously similar issue occurs when considering deliveries. It is again illogical for a delivery driver to insist on taking the long route round to the concierge when they can simply pull-up in Gilbeys Yard and quickly deliver via the alleyway. Bear in mind that most delivery firms pay by number of deliveries or, if not, give drivers a number of deliveries that is difficult to achieve in their shift – it is natural that anyway to save time will be taken.

When considering fast food deliveries the logical outcome is also clear. If they can deliver quicker by using the alleyway they will do so; the more deliveries they can make the more the driver earns.

This is grossly unfair on the residents of Gilbeys Yard.

In an attempt to suggest a greater range of options, the developer has suggested that a route out at the most easterly point of the main site by the Interchange building will ease the demand on the alleyway. This is simply not logical. Those that take this route will have to turn right into Gilbeys Yard in order to reach Oval Road, effectively meeting up with the alleyway where it enters Gilbeys Yard. My understanding is that Market Tech has not allowed access via the stairwell alongside the Interchange building. So, for almost all residents and workers this is a longer route to achieve the same outcome.

In short, this 4m alleyway will become a major and congested route into the site. Despite their endless denials, the developer has confirmed this by siting the Concierge for the entire site at this very point. In my experience a Concierge is always sited at the entrance...

Moving on to the proposed development from within. The issue of the privacy of habitable rooms is again a major issue. Within the new development itself the majority of habitable rooms are well within the 18m guidelines, some as close as 12m! (see paragraph 7.62 in the planning statement). This amount is simply

unacceptable. Furthermore, there are many examples of very high height to width ratios creating a 'canyon' effect throughout the development (for instance Roundhouse Way: 32.6m high by 15m wide).

As a consequence of the denseness of the layout, the sunlight and daylight within the site are clearly unacceptable. The GIA report states that the BRE requirement for a 5% Annual Probable Sunlight Hours requirement is met by a majority of rooms. In fact, the accompanying diagrams suggest something in the region of a third of dwellings would not reach this standard. Furthermore, the GIA report makes clear that approximately 180 out of over 1550 fail to meet the BRE standard for daylight. Of these, two thirds are living rooms or kitchens. In short, this is simply bad design that ignores so many guidelines so as to defy credibility.

It is clear that the general height and closeness of various blocks within the development result in a scheme that largely fails to reach the guidelines concerning privacy, daylight and sunlight. I feel that these factors alone should be enough to refuse planning permission but the case to do so is even stronger when the overall poor public realm and convoluted routes are added-in. Please also bear in mind that if this dense scale of development is allowed to go ahead it will set a precedent allowing One Housing to follow suit should they choose to develop their sites. Consider the overall impact to heritage alone - various listed buildings, conservation areas and protected views. It would be nothing short of catastrophic and something that could never be undone.

With reference to the mix and positioning of the residential and commercial units. I feel it is a mistake to spread the commercial units (office and workspace plus small retail units) into the south-western side of the site which is adjacent to Gilbeys Yard. Considering that the site has to rise from street level at Chalk Farm Road up to the level of Oval Road and Juniper Crescent, there is an opportunity to create a natural buffer that would best protect the amenity of the existing residents. This could be done by focusing office and workspace etc. on the north-east side of the site alongside the freight railway track. The central supermarket area would then act as a buffer protecting the existing and new residents from disturbances from the transient daily influx of office workers and the adjacent market and night time areas. This layout clearly reflects the framework guidelines much more than the developer's proposal (Framework p32).

Turning to the road access point at Chalk Farm Road. By changing this junction from the current staggered layout to a single crossroads junction will clearly cause huge traffic problems along Chalk Farm Road, Ferdinand Street and the access road into the new development (Stephenson Street). Even if we are to accept the developer's generous figures concerning usage they admit that there will an overall negative impact of roughly 8% with an increased queuing time on Chalk Farm Road itself in excess of 37 seconds! Camden roads are already struggling to cope – this huge additional strain increase is totally unacceptable.

Furthermore, when you consider the potential ultimate demand on foot via this route it is clearly untenable: by the time the Morrison's site is complete there will be thousands of people trying to use a single 1.8m pavement during the morning and evening rush hours.

In addition, cycles are generally left to compete with cars, buses and lorries – there is a small cycle path but it is token and meaningless. In fact, the traffic assessment openly shows the dangerous conflict between cycles and lorries turning left on to Chalk Farm Road. This is all clearly ridiculous and unsafe.

Furthermore, by removing the road from behind the Petrol Filling Station the developer has lost the option of placing bus stops and stands at this point. They have been forced to place the six bus stops and stands within the development on the traffic-affected Stephenson Street. Some of these stands have been placed directly beneath the bedroom windows of Juniper Crescent.

Even if we were to accept the developer's statements concerning the two access routes what it clearly shows is that they have not taken into account the neighbouring sites within the framework at all. They have, in effect, used all the capacity of these routes entirely for their own development – they openly admit that key traffic routes will be saturated. By doing so have prejudiced any future development to the other sites within the framework.

Overall, the design of this new junction and its consequences are just plain madness.

Adding insult to injury is the design of the petrol filling station with its huge glass façade. This structure has no place on Chalk Farm Road, it causes serious harm to the Grade II* listed Horse Hospital and is nothing but a coded signpost for the Morrisons supermarket. It would also cause serious issues with the consented development of 100 Chalk Farm Road and their future residents.

With reference to the 'Townscape and Visual Impact Assessment' document. I have found this document to be misleading. It appears to be full of views that conveniently show minimal impact in preference to those that are heavily impacted. For instance, there are no views whatsoever from Juniper Crescent – a direct neighbour to the site! Furthermore, the views along Oval Road swap from the eastern pavement to the western in the nearest view in order to minimise the effect (view 37). There should also be a view far nearer to the site from within Gilbeys Yard.

This very careful positioning of viewpoint is common throughout the document. View 16, Gloucester Avenue at Canal Bridge, would be far worse if taken from the alternate pavement. There should be an additional, far closer view offered from the very important Edis Street than View 18.

View 21 is, frankly, quite brazen. It appears to be taken at the exact point on Haverstock Hill when Block A is almost totally obscured by the Roundhouse. Moving just a few metres up or down the road would clearly show a far greater level of harm. Without these views one cannot fully appreciate the full harm that is caused.

I feel that this is doubly misleading. I am sure that the general public would assume that Camden Council had insisted that the developer provide the views that show the most harm and concern. Only then can fair comment be gained.

As a brief aside it is worth noting that the tenants of Gilbeys Yard and Juniper Crescent have assured tenancies. One Housing has confirmed that should they redevelop their sites the existing tenants are guaranteed properties within the new development. It therefore follows that at this moment in time the only known residents of the entire Camden Goods Yard site will be made up largely of the existing residents of Gilbeys Yard and Juniper Crescent. I strongly feel that not enough weight has been given to this important fact – we deserve the maximum of consideration, something that we all feel the developer has failed to do.

Furthermore, even though as residents our homes are threatened by being within the SPD Framework, we have actively engaged with Camden Council to help shape the final version. It is wholly wrong that this planning application treats the framework with blatant disregard.

I feel that Camden Council have made a mistake in allowing this development to reach the stage of a submitted planning application considering that it was clear that Camden Goods Yard Planning Framework would come into effect long before the application would reach the point of decision. To my mind it is obvious that this proposal was conceived without the framework in mind and had become too 'hard-wired' to be adapted to work within the framework's guidelines.

It would have been much wiser to ask the developer to pause and develop far more comprehensively in conjunction with One Housing, bringing forward a joint plan. It is not unprecedented to request developers to act in this way. This would result in an overall scheme that works well within the framework's guideline whilst ensuring that no one developer can prejudice the aspirations and options of the other. Existing residents would have the best possible outcome whilst new residents and workers would have a great place to live and work. This application fails in all these respects.

What is very striking is that there is no sense in which the benefit of this development has been balanced against the harm it will create. It seems that once any benefit has been shown (by way of welcome additional social housing and also to the local economy) then harm is to be accepted at whatever level. What I fail to see is the real question being carefully considered: does this much harm justify the amount of benefit offered?

When you add up the harm to existing residents, the harm to heritage from all sides, the huge effects on traffic, the proposed dangerous traffic junction, the lack of privacy and daylight/sunlight that many of the new properties will endure, the overall incoherence and poor design of the site itself along with other factors such as the underestimated drain on local resources, I feel the answer is clear: an unequivocal no. This is then further compounded by the proposal's inability to meet the requirements of the SPD Framework.

In view of all of the above, I trust that you will refuse permission accordingly.