

Richard McEllistrum
Principal Planning Officer
Development Management
6th Floor
Camden Town Hall Extension
Argyle Street
London
WC1H 8EQ

11th August 2013 (date)

Dear Richard

Application Number: 2013/3807/P

Site Address: Land to west of Royal Mail Sorting office bounded by Phoenix Place, Mount Pleasant, Gough Street and Calthorpe Street, Camden WC1

Please find my comments and concerns about the proposed Mount Pleasant development. I realise that these comments have been sent after the "official" deadline for comments, but as you have assured the community that comments would be continue to be accepted well beyond this deadline, I fully expect this not to be an issue, and my comments will be treated as if they were received within the deadline. I would ask that you would acknowledge this to be correct at the earliest opportunity.



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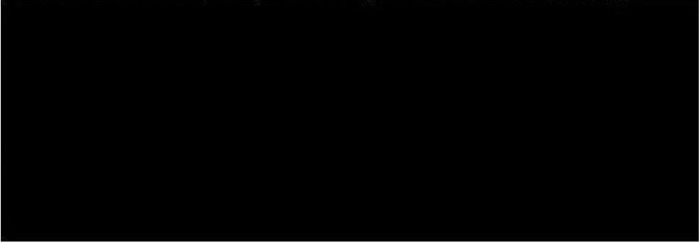
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**VIEW
COMMENTS
AND
CONCERNS
ON PAGES
9 TO 20**

Tower A3

Positioning

I, and the vast majority of other local residents, think it would be preferable if all of the tall buildings were sited closer to the centre of the site, adjacent to the central part of Phoenix Place and possibly over to central section of Gough Street. A central location would not be as close to existing residential buildings, although adjacent to other existing tall buildings: the Mount Pleasant sorting office at Phoenix Place, and the ITN building, and its neighbour, at Gough Street. This would allow the corners of the new site, particularly opposite Laystall Court and Holsworthy Square, room to breath and leave the residents of these building some air and light.

The vast majority of local people expressed the view that the the mass of buildings, but particularly the taller ones, would be best placed right in the centre of the site, and that the periphery of the site should be open space for all to enjoy. This view has been constantly expressed at all of the consultation meetings, but yet it remains the polar opposite of what is being proposed.

Loss of Privacy and overshadowing

I am extremely concerned over the loss of privacy and light that the proposed tower A3 will bring. One third of the flats in Laystall Court have a single aspect that faces the proposed tower A3. The remaining two-thirds of the flats all have their living rooms and the master bedrooms facing the proposed tower. With the exception of the ground floor, the side of tower A3 that will face Laystall Court is entirely comprised of living rooms and bedrooms. So, in short, every single resident of Laystall Court will have a significant loss of privacy, and due to the close proximity of such a tall and dominant building will have a very poor outlook. Paragraph 4.2.11 of the SPD states that the "siting and design [of taller buildings] should be carefully considered with regard to the nature of the surrounding places and the quality of life for those living and working around them", which clearly is not the case here.

Tower A3, at 15-storeys, is a full five storeys higher than Laystall Court — half the building's height again. Even those on the 9th (top) floor will be overshadowed. This directly contradicts section 4.2.13 (Height, scale and massing) of the SPD, which states that no building should appear "overly dominant" or create "an undue sense of enclosure and poor outlook". And also contradicts Policy 7.6 of the London Plan, which states that "in particular where tall buildings are proposed, development must not cause unacceptable harm to the amenity of surrounding land and buildings, in relation to **privacy**, [and] **overshadowing**". I believe that the loss of privacy and overshadowing that will inevitably be caused by such a large and tall structure will be unacceptable and significantly detract from the quality of life

currently enjoyed by all the residents of Laystall Court. And those living in the lower floors, and those living in the northern wing (due to the closer proximity to the proposed tower), will be affected the most. Section 4.2.13 of the SPD (Height, scale and massing) states that "building heights will be assessed against a range of design issues, including the potential for unacceptable overshadowing, loss of privacy to habitable rooms and loss of direct sunlight and daylight." I sincerely hope this is the case and the height of this structure will be significantly reduced, and the building moved back somewhat to create more space between it and Laystall Court. It should also be noted that tower A3 is the only tower (of the seven on the proposed site) that is placed opposite an existing residential building – Laystall Court.

Local Context

Height and density

The highest tower (A3) and the highest densities have been proposed for the south-west corner of the site. One justification, given by one of the architects, for the positioning of the highest tower is the existence of equally high buildings at this point, namely: the ITN building, Laystall Court, and Mullen Tower. It was reported that this was how the architects interpreted their brief for keeping building appropriate to the local context. However section 7.21 of the London Plan reminds us that:

Architecture should contribute to the creation of a cohesive built environment that enhances the experience of living, working or visiting in the city. **This is often best achieved by ensuring new buildings reference, but not necessarily replicate, the scale, mass and detail of the predominant built form surrounding them** [my emphasis].

It seems to me exceptionally simple-minded, wholly unfair, and totally inappropriate to think it acceptable to burden an area of already high-density residential dwellings with more of the same. Of all the areas bounding the proposed site, it is beyond question that this corner has the highest residential densities of all. Mullen Tower, Laystall Court, Holsworthy Square, and Gray's Inn Buildings (along with the soon to be completed Mount Pleasant Studios) all surround this corner of the site and are all high-density residential buildings with little or no access to open space.

Section 3.3.6 of the SPD states that it is important that "any future development responds to and integrates with the surrounding neighbourhoods". The "response" in this case is to place the largest density of people and the largest building of the

development next to the neighbourhood that already has the high-densities and more than its fair share of tall buildings!

The majority of the existing residents of this corner of the site are in social housing. Many do not speak English well, some are suspicious of the authorities, and many are vulnerable people, and this will be particularly true for those living in the Mount Pleasant Studios. Many of these people are not in the position to register their concerns. I fear that it is no coincidence that the highest, and densest part of the development is proposed to be sited next to an area that is likely to be seen to offer the least resistance, and well away from the very much more affluent streets of private homes that bound the site on the Islington-side of the development.

Section 4.2.10 of the SPD (Height, scale and massing) states "heights of buildings should be appropriate to the local context." I would argue that the existence of high-density residential buildings, in close proximity to existing tall office buildings means the area is already overly crowded, and therefore it is clearly inappropriate to site more high-density, tall buildings close by. My argument is supported by section 7.25 of the London Plan, which states that tall and large buildings "should be resisted in areas that will be particularly sensitive to their impacts". Section 4.3.32 (Height, scale and massing) states that "consideration must ... be given to the impacts that building heights may have on amenity of surrounding buildings and spaces." Where is this consideration?

Section 7.21 of the London Plan states "all buildings should help create streets and places that are human in scale so that their proportion and composition enhances, activates and appropriately encloses the public realm". How can a large 15-storey structure in a neighbourhood already dominated by the similarly sized ITN building, but with no existing residential buildings above 10-storeys, be considered "human in scale"? A human will be dwarfed against it.

Four corners

The SPD states one of its design objectives is to "enhance the four corners of the site" (section 3.4.3 - point 8). The proposed tower A3 will, if built, form one of these four corners. Placing an unprecedented 15-storey tower that will dwarf the existing primarily residential fabric, and is widely objected to by the vast majority of the local residents, cannot in any sense be said to be an enhancement.

Proximity of schools

The architects of the tower – for all their talk of respecting the existing fabric – have admitted they were completely unaware of the existence of Christopher Hatton Primary School. A community school of 250 pupils ranging from three to 11 in age that borders the site in the south-west corner.

Section 4.2.11 of the SPD clearly states that the siting of taller buildings should be **carefully** considered with regard to the nature of the surrounding places and the quality of life for those living and working around them. Section 3.3.6 of the SPD insists that "any future development responds to and integrates with the surrounding neighbourhoods". And section 4.3.32 of the SPD (Height, scale and massing) states that "consideration must ... be given to the impacts that building heights may have on amenity of surrounding buildings and spaces."

I ask (and demand answers): how can the siting of a 15-story building said to be carefully considered, or said to respond to and integrate with the surrounding neighbourhood, and how was it possible for the architects to have fulfilled their obligation to consider the impacts of Tower A3 on Christopher Hatton Primary School, when the architects publicly admitted to being unaware that a school – less than 20 or 30 metres away – even existed when they drafted their plans?

The playground entrance of the school where almost almost all the pupils enter and exit each day is in Pooles Buildings (a short, narrow alley that opens on to Mount Pleasant) which is directly opposite the proposed tower. The tower will dwarf the school, dominate the outlook from the gates and playground, and induce a sense of confinement. This is a school already hemmed in by, and in part beneath Rosebery Avenue on one side, and further hemmed in by three high-density residential buildings on two of its other three sides. The only open outlook from the school is currently where the 15-storey tower A3 is proposed. This obviously contradicts section 4.2.13 of the SPD (Height, scale and massing), which states that any building must not appear "overly dominant, creating an undue sense of enclosure and poor outlook". And goes against section 7.25 of the London plan, which states that tall and large buildings "should be resisted in areas that will be particularly sensitive to their impacts" and section 7.7 of the London Plan that states tall buildings "should not be encouraged in areas sensitive to their impact". If very young children are not to be considered "sensitive" then who, or what, is? This point is further reinforced by policy 7.7 (Location and design of tall and large buildings) of the London Plan, which states:

Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations. Tall and large buildings should not have an unacceptably harmful impact on their surroundings.

Section 4.2.10 of the SPD (Height, scale and massing) states:

The councils will seek to ensure that all new development will make a positive contribution to the public realm. **Heights of buildings should be appropriate to the local context** [my emphasis].

How can such a large structure in such close proximity to an already confined school ever be considered "appropriate"?

It also overshadows the 1A Children's Centre - itself containing a nursery school, whose only open space is a balcony that faces the proposed tower.

Precedence

Churchill House, at 40 Laystall Street (which has most of it's frontage on Mount Pleasant directly opposite the proposed tower A3), was the last building to be built on Mount Pleasant. Originally proposed as a 10- (or possibly more-) storey tower, this was subsequently reduced to five-storeys because of the detrimental impact such a structure would have had on the local area. I suggest that this sets a precedence and that no new building situated in proximity of Christopher Hatton Primary School should exceed this height of five-storeys.

As Churchill House was effectively capped at five storeys as more storeys were seen as being detrimental to the enjoyment of the school, then it is with out doubt that large 15-storey structure only some tens of metres away from the school will similarly have a large detrimental impact. And this contradicts section 7.26 of The London Plan, which states "Tall and large buildings ... should not have a negative impact on the amenity of surrounding uses."

The site of the proposed tower was originally occupied by two storey, terraced houses. The site hasn't been built upon since then to the best of my knowledge. There is no historic precedence for a tall building on this site.

Positioned in a hollow

The south-west corner is the lowest-lying portion of the site — it is the bed of the former course of the Fleet River. I am worried that this fact was seen simply as an opportunity to cram in more floors and still satisfy their need not to compromise the Mayor's London View Management Framework Protected Vistas that pass over the site from Kenwood and Parliament Hill (SPD, section 4.2.11). I believe in their eagerness to exploit the opportunity for a higher structure at this point, RMG were prepared to overlook, or simply didn't consider, the huge negative impact on the immediate locality of siting a huge tower in what essentially is a hollow. Any negative impact, such as overshadowing, or loss of light, will likely be amplified.

There is a real danger that the south-west corner will become dank and gloomy particularly in winter. Already the small area of public space in front of Laystall Court becomes treacherously slippery in winter due to the damp conditions. A tall building may alter the microclimate making this much worse, directly contradicting Policy 7.6 section B-d of The London Plan, which states:

Buildings and structures should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, in relation to privacy, **overshadowing, wind and microclimate. This is particularly important for tall buildings** [my emphasis].

And also contradicting section 4.2.13 of the SPD (Height, scale and massing) that warns there must be an "avoidance of adverse environmental effects at ground level".

Section 4.2.3 of the SPD states that the "councils will seek to improve the quality of the environment and protect the amenity of occupiers and neighbours." Let us hope that this statement will be shown to be true, and that the councils will indeed do so by preventing such a tall and large building from being built in the south-west corner, and ask RMG to think again.

No access to public space for the south-west corner

The immediate neighbourhood adjacent to the south-west corner of the proposed development has undoubtedly the highest density of residential dwellings when compared to any other neighbouring area. All of the large residential buildings (Laystall Court, Holsworthy Square, Mullen Tower) lack balconies and any significant amount of usable outdoor space (by that I mean other than car parks). There is also a school and two nurseries within spitting distance. (The south-west corner is one of the "four corners" as identified in section 3.3.20 of the SPD.) The poor quality of the open spaces of the neighbourhood is acknowledged in section 3.3.17 of the SPD.

Yet, the proposed monolithic and impermeable structure proposed for this south-west corner provides no access whatsoever to the new open spaces to be created within the development. Meaning everyone, including the elderly, the infirm and and young children cannot easily enjoy these new spaces. Policy 7.7 of the London Plan states that tall and large buildings should "contribute to improving the permeability of the site and wider area, where possible". There is no reason why direct access could not have been provided to the public open spaces of the new development, and so the failure to provide such access is in direct contradiction to this policy.

Section 4.1.2 of the SPD states that it is **priority** for the council to "open up the site with both new and improved streets that make better connections between Mount Pleasant and the surrounding neighbourhoods." However, the plan as it stands has no new streets that connect with Mount Pleasant whatsoever! The same section goes on to say that another **priority** for the council is to "create new high quality and inclusive public spaces for local people both on the site and at its four corners". If this is truly the case, where is this new high quality inclusive space to be? The small triangle of open space outside of Laystall Court could be expanded and much

improved (see below). But as this space will also serve many of the hundreds of new residents in what is proposed to be the densest part of the development with the tallest building this alone can hardly be seen as adequate.

What is being proposed is a wall of shops and cafes at ground level. This is not unwelcome, but should be supplemented and broken up by access to new open space within the site. Section 3.3.18 of the SPD talks of the importance that open space has in integrating the Mount Pleasant site into the adjoining neighbourhoods. Whilst a row of shops and cafes may be said to help link the site to the existing neighbourhood, without access to within the site itself, the very same row of shops and cafes, topped by a looming 15-storey tower-block, will form an impenetrable barrier, and fail to achieve the objective of integrating the Mount Pleasant site into this dense neighbourhood. Many have commented that the proposed development is fortress-like, with the buildings along the perimeter, looking inwards, and turning their backs on their surroundings and the existing residents.

The children and young people in our building, Laystall Court, of which there are at least 14, mostly of primary-school age or younger, have nowhere within the immediate vicinity to play. Laystall Court, other than a car-park, and two small shrubberies, has very little outside space. None of which is secure. What little outdoor space we have is dirty, often used as a toilet, and frequented by drug-users, drug-dealers and street-drinkers. Residents regularly find used syringes along with other drug paraphernalia and broken bottles. It is hardly the place for children to play. Eight children, possible more, from Laystall Court attend Christopher Hatton Primary School.

The school has around 250 children in attendance, but has very limited outdoor space, with no grass and no swings, slides or playground-type activity-equipment due to lack of space. A significant part of the play space (it's estimate about half) consists an open "room" *under* the school itself, a narrow light-well skirting two sides of the rear of the school, and two arches *under* Rosebery Avenue.

At least ten per cent of Laystall Court's residents are retired and several are quite elderly. These residents need access to quality outdoor space, which we currently do not have.

It is very clear that there is an overwhelming need for suitable, quality outdoor space for our most vulnerable residents — our children and retired residents — not to mention all the other residents of working age. And this need is not confined to Laystall Court: there is the school, the 1A Children's Centre, Holsworthy Square and Mullen Tower (both high density residential buildings, like Laystall Court). And yet no new public space at all is proposed near us (instead it is proposed to put the largest, tallest, densest tower-block of the entire Mount Pleasant Site dominating our corner). From the very first time the community was consulted we asked for access to open space for local residents and schoolchildren. But again the

consultation process failed us and we get the polar opposite: the tallest building of the development. This surely is the greatest missed opportunity of the entire scheme.

Proposal for a new square at the south-west corner

Many local people, including Ms Gwen Lee, the Headmistress of Christopher Hatton Primary School, are strongly in favour of creating a new "square" at the corner of this congested south-west corner of the site. This could potentially be combined with closing a section of Mount Pleasant to allow a concurrent space linking the new development with existing urban structures including the school, and incorporating the existing triangle of paved space outside Laystall Court. By pushing back and lowering the proposed tower, and levelling and terracing the ground, a large new square could be formed where it is needed most. Shops and cafes in the ground floor of the proposed building would line one side of the "square", whilst the Apple Tree pub, the adjacent short terrace of building, Laystall Court, the school entrance, and Churchill House (with its bar/restaurant — "Rangos" — on the ground floor) would form the opposite side. Suitably landscaped, this space could provide high quality play-equipment, benches, and space for dinners and cafe goers to eat and drink outside. It could be an outstanding space.

Section 3.3.19 of the SPD supports this idea by saying "a square would benefit both new development and the surrounding areas by improving the quality of the public spaces and make the area more attractive, as well as providing better connections between the site and the surrounding streets and neighbourhoods."

The proposed new street "Calthorpe Lane"

Much has been made by Royal Mail of their proposed new street, which starts at a point on Farringdon Road where there is **no** pedestrian-crossing, and very close to the proposed new entrance to Royal Mail's underground goods-yard where an estimated 3,000 postal-vehicle movements will occur each day, and ends in Phoenix Place. The new street does not link with Wilmington Square as originally intended as there is no crossing at this point on Farringdon Road; and we are told no crossing is planned to be created. People will not be able to access this new street easily, as it will be virtually impossible and dangerous to cross Farringdon Road at this point. And as it ends in Phoenix Place — a street that is all but deserted except for the car-park and goods entrances of two large office buildings

— there is no real need for the street in the first place. Once again, the positioning of this new street shows that the architects of this scheme have failed in their obligations to link the site cohesively into the existing urban-fabric, and make sensible connections to the surrounding neighbourhoods. Section 4.1.2 of the SPD states that it is one of the council's priorities to "open up the site with both new and improved streets that make better connections between Mount Pleasant and the surrounding neighbourhoods".

This new "street" is not popular locally. However, it is thought by many that a non-vehicular route running diagonally across the whole site from the corner opposite the Holiday Inn (where a crossing already exists across Farringdon Road) to the corner by Elm Street (opposite Holsworthy Square, Laystall Court — both large residential buildings — and Christopher Hatton Primary School, and close to the bustling junction of Rosebery Avenue, Grey's Inn Road and Theobalds Road, and many shops and restaurants) would be a much more sensible and useful route. It would open up the site and provide the opportunities for large open spaces along its route. This would better fit the priority set out in section 4.1.2 of the SPD (as detailed above).

Building dust and pollution

The proposed site is likely to be highly polluted. It is known to have been a laystall (a rubbish heap) prior to being built upon, and the area formed part of the west bank of the Fleet River, which was for decades literally an open sewer. After the site was built upon it housed a variety of industry, suffered bombing during the Second World War and finally has been used as an unsurfaced car-park by Royal Mail for doubtless tens of thousands of vehicles over the last 60 or so years. In short, the site is likely to be highly polluted and may even contain unexploded bombs.

Laystall Court was built in 1958. It has single-glazed Crittal windows. Each window incorporates a large, permanently open vent the size of a letter-box. Most residents attempt to seal these vents for most of the year using a variety of methods. One resident told me they stuff the vents with socks! Whatever method, none is completely successful and these vents let in terrible draughts. These windows are now over 50 years-old. In the latter decades they have not been adequately maintained, and are now ill-fitting, many with faulty catches. As a consequence all the windows let in draughts. And the single glazing and open vents mean there is no soundproofing at all.

Laystall Court is immediately opposite the proposed development site. All of the flats have at least their living-room and master-bedroom facing the site. One-third

of the flats have all their rooms facing the site. Once building commences we will be subjected to constant noise and dust, and possibly toxic-contaminants contained within the dust. There are at least 14 children living in Laystall Court, including several babies, and many retired residents. We do not wish to subject our children, or our elderly residents, to potential contaminants.

Due to the state of our building's windows it would be impossible to stop dust entering our homes. All residents will have to breathe in potentially toxic dust day and night. Nor could we insulate ourselves from the construction noise. So I ask that the developers, or the council through the Section 106 money, to pay for either new windows, or to upgrade our current windows to a standard that would allow us to stop the ingress of dust, and protect us against excessive construction noise.

Car parking

Some residents, particularly our elderly residents who do not have a designated parking spaces within the car-park of Laystall Court, have significant worries about the effects that the new development will have on-street parking and I seek an assurance that they as long-term residents will still be able to find a parking spot locally, or be allocated one within the new development.

Vehicles

It is estimated that there will be some 3,000 postal-vehicle movements a day from the expanded operations at the Mount Pleasant Sorting Office. I as a resident of Mount Pleasant would like an assurance that no postal vehicles will be allowed to use Mount Pleasant, Elm Street, Gough Street, or Laystall Street, and that their routes will only be along the major arterial routes. Christopher Hatton Primary School has entrances on both Laystall Street and Mount Pleasant (leading out from the Pooles Buildings entrance) and it would be very undesirable if traffic were to increase along either of these two streets. The safety of local children, which is already a concern on Mount Pleasant, should be paramount.

Richard McEllistrum, Principal Planning Officer, Camden, stated that vehicle routes can be controlled by "planning (section 106) legal agreement". I ask for a firm guarantee that such a control will be put in place as part of any planning consent.

No historic reference

Phoenix Place was once the Fleet River. The Fleet River defined the area for centuries, and the section of the river around Mount Pleasant was the last to be enclosed in about 1850. The old parish boundaries clearly show the course of the river and its tributaries across the site. But yet there is no mention or reference to the river in the plans. Section 4.1.2 of the SPD states that one of the council's priorities is to "promote high quality design for buildings and public spaces which sustain and enhance the historic significance of the site and its surrounding area." I ask that the Fleet's historic importance, and that the proposed development's location above the Fleet River be acknowledged and referenced in some respect. Perhaps, at a minimum, one of the newly formed public spaces could be named "Fleet Square"?

Information overload

The planning application alone comprises of 24 documents totalling just under 2,500 pages, often written in what have termed "verbose and unintelligible language". I, along with many others in the community, feel that we have been given too little time to study the enormous amount of material, and make comment on upon it. My worry is what has been missed. The community have consistently asked for more time to make our comment, and so I ask again for an extension for comments.

Consultation ignored

At the first public meeting (held in the Holiday Inn) the proposed height of tower A3 (directly opposite Laystall Court) was so controversial that one of the architects/planners explained publicly that it was "a mistake" (these were his exact words) and it was in fact not that high. At the next meeting we were astounded to find the height of the tower had actually been increased! What is the point in having a consultation if it achieves no real change. In fact, worse than that, I, and many others in the locality, feel that the consultation process was a sham: simply an exercise to quell dissent. And, certainly in the case of the height of tower A3, that the community has been lied to.

Section 106 money

I request that the community receives a firm assurance from the council that all of the Section 106 money will be spent locally, that is within the immediately area bordering the site. Specifically I would like to see the money spent on:

1. The formation of a new public square at the south-west corner (as detailed above); and
2. New windows, or a refurbishment of our existing windows, (specifically double-glazing) in Laystall Court (and any other building that is likely to be effected similarly by the works) to help ameliorate the effects of building noise and dust (as mentioned above).

[Ends.]