Dear Mr Fowler,

Re: Planning Application 2015/2704/P

As representatives of Coopers Lane TRA, we wish to make you aware of our strong objections to the proposed Central Somers Town development, application number referenced above. As immediate neighbours to the site of the proposed development, and managers of the Coopers Lane TRA hall and garden, we are of the view that the proposed development would have a serious impact on our health, wellbeing and standard of living.

SUMMARY

Coopers Lane TRA strongly objects to:

- 1. The proposed destruction of the unique architectural design of this low-rise estate.
- 2. All building on Purchese Street Open Space. The proposed buildings are alien in character and scale to the area.
- 3. Loss of privacy, daylight and sunlight to residents' homes on Coopers Lane Estate. The likelihood of additional noise.
- 4. The devastating loss of trees and the resulting impact on air quality.
- 5. Loss of the Coopers Lane TRA Hall and Community Garden, which would weaken community cohesion and lead to increased isolation and exclusion.
- 6. The cumulative impact of past and future major construction works on the residents of Coopers Lane.
- 7. The way our views have been repeatedly misrepresented or discounted throughout the consultation process.
- 8. We will comment further once we have seen the developer's plan to manage and run the community hall and garden.

HISTORY AND DESIGN

Coopers Lane Estate was constructed between 1978 and 1981 and was designed by the Director of Technical Services, Camden as a 6-acre development on the old coal depot. Some 4 acres of the site provided 169 units of housing, 2 shops and a community hall, and 2 acres of the site being designated public open space.

The large family houses and maisonettes and about a quarter of the flats have private gardens. Private balconies are provided for a further 20 of the smaller

Coopers Lane Estate design. [See London Borough of Camden Department of Technical Services article, 1981.]



Coopers Lane Estate, including Purchese Street Open Space, as seen on Camden's estate signs.

The current proposal ignores the fact that Coopers Lane Estate and Purchese Street Open Space were designed as one, and seeks to divide one from the other. It proposes a high wire fence be built around the housing, creating a new boundary. [See Central Somers Town Masterplan, DAS, p.120] New housing blocks are being built with no regard to the existing homes, and are designed to separate and isolate Coopers Lane Estate. The entrances to Coopers Lane are being pushed back, creating an island estate, cut off from the rest of Somers Town.

LOW-LEVEL HOUSING

Coopers Lane is made up of 9 blocks of 2/3/4-storey housing. It is clearly different in scale from St Pancras train shed to the east and the Francis Crick Institute to the south. This is made explicit in Plots 5 and 6 DAS, p.17: "The

scale of the newly extended train shed at St Pancras International and the Kings Cross redevelopment beyond, as well as the huge arching mass of the Francis Crick Institute juxtaposes abruptly with the rather suburban scale and feel of the Coopers Lane estate which sits immediately opposite, the sudden change in architectural massing reading in many ways as a boundary condition between the relentlessness of the city and the calmer, residential quality of Somers Town." This boundary, explicit in the change of architectural scale, is why the boundary of the Central Activities Zone runs down Midland Road and along Brill Place. It is why the proposed 25-storey tower (plot 7) on Purchese Street Open Space is so alien in terms of character and scale to the area. And it is why the proposed housing on plots 5 and 6 would overpower and dominate homes on Coopers Lane.

QUALITY OF LIFE

We are of the view that the proposed development would harm the amenity of Coopers Lane resides, and would have a severe, detrimental impact on our quality of life. We we it goes against the spirit and the letter of Camden's cy DP26. Specific objections are as follows:

Privacy and overlooking

Plots 5 and 6 are unacceptably close to existing homes on the Coopers Lane Estate and if built would result in loss of privacy as well as light. Bedrooms overlook the back gardens to terraced housing on Hampden Close. Screening by a mature London plane tree is not an acceptable design measure to reduce the potential for overlooking and the loss of privacy. The London plane tree will be bare of leaves during winter months. Trees also die. The developer should instead "give careful consideration to the location of your development". [Camden Planning Guidance 6: Amenity: Overlooking and Privacy]

Bedroom and living space windows of Plot 6 are 12 metres from the rear façade of the terraced housing on Coopers Lane. Camden Planning Guidance says there should be a minimum of 18 metres between the windows of habitable rooms of different rooms that directly face each other. The idea that this can be mitigated by climbing plants and pleached fruit trees along the boundary fence is absurd. The developer should instead "give careful consideration to the location of your development." [Camden Planning Guidance 6: Amenity: Overlooking and Privacy]

The 25-storey tower proposed for Plot 7 would overlook the entire Coopers Lane Estate, and would be an oppressive presence. The fact that the apartments in the tower would be unaffordable to anyone currently living in Somers Town means that Coopers Lane residents would be looked down upon even in their own homes. An unwelcome new experience of living in Camden.

Daylight and sunlight

"Access to daylight and sunlight is important for general amenity, health and wellbeing, for bringing warmth into a property and to save energy from reducing the need for artificial lighting and heating." [Camden Planning Guidance 6/Amenity/Daylight and sunlight] The Daylight, Sunlight and Overshadowing Report shows that most homes on the Coopers Lane Estate, including Clyde Court, would receive a significant worsening of daylight and sunlight levels if the development goes ahead. This would have a direct, negative impact on residents' health, including mental health, and wellbeing. It would also have a negative financial impact as we would have to spend more money heating and lighting our homes. The function of all rooms that are impacted needs to be identified as a matter of urgency. Many of those residents who have gardens would find them overshadowed. We believe that the proposed development not only goes against Council policy, but also infringes on residents' legal right to light.

Noise

Purchese Street Open Space is currently a peaceful area of grassy woodland. It is predominantly a soft, green space, criss-crossed by paths. The proposal would result in a dramatic change from soft to hard landscaping, meaning less ambient noise would be absorbed. In particular, the massive loss of trees in Purchese Street Open Space and Coopers Lane TRA Community Garden would mean noise that is currently muffled would be much more audible.

If blocks of flats, including a 25-storey tower block, were erected in the park, the people in each new dwelling would create extra noise. This type of noise is objectionable <u>in a park.</u>

Additional noise created by the proposed community hall and garden is discussed below.

Perhaps the final insult is that the dog area has been sited next to Coopers Lane residents' gardens, meaning that excited dogs would be barking there for hours every day and, possibly, night.

Air quality

The air quality in Coopers Lane is demonstrably bad, due to the estate's proximity to St Pancras Station, Midland Road and a nearby taxi rank. The air quality report shows that the Coopers Lane Estate would have a beneficial impact on the housing planned for the park: "The Purchese Street housing would in part be shielded from direct impacts from Midland Road by the presence of the Coopers Lane housing." [Central Somers Town Air Quality Assessment/5.4/p.29] The report does not, however, mention the impact that building on Purchese Street Open Space would have on Coopers Lane residents. Winds in Somers Town are largely south-westerly, so Coopers Lane currently receives air from Purchese Street Open Space. This wooded area acts as our lungs, combating pollution from the station. Cutting down dozens of trees in the park and community garden, and building blocks of flats on the park would probably lead to an immediate drop in air quality.

The development would mean an increase in pollution from the Phoenix Court CHP. The impact of this on the wider community, including Coopers Lane Estate, has not been modelled.

The tower would change the way emissions disperse from the Phoenix Court CHP and Francis Crick Institute. The impact of this on the wider community, including Coopers Lane Estate, has not been modelled.

Wind

The developer's wind study was designed to model the wind flows at the proposed tower rather than the wider area. It does not show the impact of the tower on the wind flows through the wider area, including Coopers Lane. Purchese Street Open Space is not flat, and at the moment many gardens on the estate are sheltered from wind. Building plots 5, 6 and 7 on the open space is likely to dramatically change wind flows. The modelling does seem to show that gardens in Coopers Lane Estate would be less comfortable if the development went ahead. It should be noted that the model missed off part of Hampden Close when showing wind flows through the masterplan.

COMMUNITY SAFETY

Roads within Coopers Lane Estate are private and should remain so, with barriers in place. The possible parking/loading bay location at the top of

Hampden Close is unacceptable. Having these roads open encourages illegal parking and other antisocial behaviour.

COOPERS LANE TRA HALL & COMMUNITY GARDEN

Coopers Lane Tenants and Residents Association aims, among other things, to provide facilities for recreation and amenity and to encourage community cohesion and the development of community spirit. The TRA hall is a meeting place for Coopers Lane residents and the wider community. We hold regular association meetings, weekly tea and chat sessions for older and vulnerable residents, bingo clubs, exercise classes and parties, including children's parties, for those living on the estate. Residents can also use the hall either free of charge or at very reasonable rates for their own social events, meetings, henna parties, funeral wakes, engagement and wedding parties and birthday parties. Community groups and individuals from the wider Somers Town community are able to use the hall either free of charge or at very reasonable rates, depending on the use.

The TRA's income comes from hiring out the hall. It spends this income on trips and social events for Coopers Lane residents.

The new plans make clear that the "reprovided community hall" would be nothing of the sort. "A new community hall for use by local community groups including Coopers Lane Tenants means that the new facilities will be actively used throughout the day." [Central Somers Town Masterplan DAS, p.104] So, a private amenity run by Coopers Lane TRA for the benefit of Coopers Lane residents is being taken away. We would lose all our income and with it our ability to fund trips and events for the residents. Instead, Coopers Lane TRA would have to book the new community hall like any other organisation.

The new community hall would be open throughout the day: Monday to Saturday, 08.00–23.00 and Sunday and Bank Holidays, 09.00–22.00. It would need to be staffed in order to ensure safe supervision of the hall, public toilets and garden equipment that would be freely accessible throughout the day. Staffing costs, including caretaking costs, as well as rent and maintenance costs, would mean hire charges were considerably more than in the existing hall, making it unaffordable to local people. Even if Coopers Lane tenants and residents were given free access for regular groups and events, they would not have priority use of the hall – as the hall's main priority would be to break even. (Something that might be difficult, given there would be a direct competitor in Ossulston Street.)

Because the existing Coopers Lane TRA Hall is run for the benefit of Coopers Lane tenants and residents, it is a responsible neighbour, taking issues of noise particularly seriously. The TRA takes pride in the fact that our hall is one of the busiest in the area and yet has a quiet street presence.

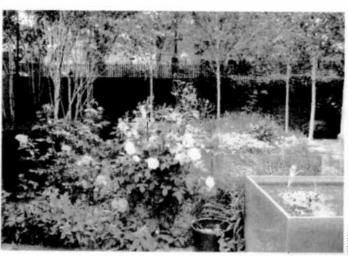
The planned replacement hall is likely to be noisier as doors to the community garden would often be open. There would probably be conflicts about noise with neighbours around and above the hall.

The existing hall is popular for classes and groups where an element of privacy is required. It is a safe space. The very openness of the planned hall would exclude some groups from using it.

The developer needs to provide a plan identifying how the community hall would be managed and run. They need to give a full breakdown of expected costs, including staffing costs.

Attached to Coopers Lane TRA Hall is our community garden. The boundary of the community garden is wrong in all the developers' plans and does not reflect the transfer of land that took in place in 2002 and provided "some additional amenity to residents of Coopers Lane estate." [Land transfer document] This land transfer to provide Coopers Lane residents with more growing space was made by Camden. Landscaping and planting were provided by CTRL as a gesture of appreciation after the years of disruption residents suffered with the channel tunnel rail link.

Our garden is largely for the use of Coopers Lane residents, although gardeners from other parts of Somers Town, and indeed children from Edith Neville School, have been welcomed. It is designed as a peaceful, quiet, secure, private garden, where plants and wildlife flourish. It is a space that is valued by residents of Coopers Lane.



Scented roses and water lilies help to create a tranquil haven in the middle of the city. Coopers Lane TRA Community Garden.

This important community asset is used by a lot of elderly and vulnerable residents, including residents of Clyde Court. It is a calm oasis that makes an

Ornamental planting in the foreground, fruit trees and allotments in the background. Coopers Lane TRA Community Garden.

important contribution to their health and wellbeing.

Part of the garden is run on an allotment system, with community members growing their own vegetables and fruit. There is a shortage of community gardens and allotments in Somers Town and one of the recommendations of the

Open Space Study 2014 was to "Strengthen the role of existing privately managed community gardens / allotments within the catchment area."

The current proposal would take away Coopers Lane TRA Community Garden. This private open space is not being reprovided for Coopers Lane residents. Instead, a new community garden would be public open space.

The proposed new community garden has the following problems:

- 1. It is a long strip of land with lots of paths and very little growing space.
- 2. It is shaded for most of the day (unlike the current, south-facing community garden).
- 3. It would not be secure during the day unless supervised. The volunteers who run Coopers Lane TRA Community Garden would be unable to supervise the new garden throughout the day. As public open space, this would have to be down to the parks department.
- 4. The public would probably help themselves to fruit and vegetables in the park, meaning it would be impossible for people to have their own small allotment space.
- 5. There is no mention of opening times. The developer needs to provide a clear plan of how the community garden would be managed and run.
- 6. We understand that tools and toilets would be accessible both through the community hall and from outside. It would be essential that both these areas were properly supervised at all times.
- 7. It would probably create a lot of noise by residents' gardens, particularly if community hall events spill out into the garden.
- 8. It has a cycleable route running through it, which is hazardous.

National Policy Framework paragraph 74 is clear that existing open space should not be built on unless: an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

- There is a clear demand for community gardens in Somers Town.
- The loss would not be replaced by equivalent in terms of quantity.
 Coopers Lane residents would be losing this private open space/community garden.

A new community garden is proposed within existing public open space [see CST Masterplan, p.88]. Private open space has been taken from 'Housing', both in the community garden and the smaller garden and southern entrance to the estate, and used to make up the public open space figures.

- The loss would not be replaced by equivalent in terms of quality. The
 proposed replacement would be less secure, less sunny and have less
 growing space. Most importantly unlike the existing garden no one
 would have ownership of it.
- The development is not for alternative sports and recreational provision.

CUMULATIVE IMPACT

Residents of Coopers Lane have had to put up with years of construction works that have been on a scale unseen elsewhere in the borough. The British Library was quickly followed by CTRL, then the Francis Crick Institute, which is soon to be finished. We have also had noise, dust and construction traffic from the Kings Cross Development. HS2 and Crossrail2 are likely to start work in the next few years, further damaging our environment, with construction lorries planned to go down Midland Road. The mental and physical health of residents of Coopers Lane has suffered terribly in recent years. This must be acknowledged and taken into consideration by Camden Council.

CONSULTATION

Coopers Lane TRA have responded to every round of consultation. We have repeatedly said that this proposal is going to wreck Coopers Lane estate and is going to have a terrible impact on residents' health and wellbeing. The CIP team have ignored our views at every stage of the consultation, eventually coming up with a proposal that takes away our hall, our garden, our light, our privacy, our trees and fresh air, our green and whatever peace of mind we have left after years of construction work. It has been obvious from the start that the wishes of the schools and play service were more important to the CIP team than the wishes of local residents.

Eashmota Khatoon, Chair
Lil Scott, Vice Chair
Wendy Priolo, Treasurer
Jeanne Thomason, Secretary
Rosalind Faville
On behalf of the Tenants and Residents of Coopers Lane

London Borough of Camden Department of Technical Services

Somers Town Redevelopment (Coopers Lane Estate)

The development is located on an island site of some 6 acres iformerly an elevated railways coal depoit, immimediately to the north-west of St. Pamoras Station. The decision of the Council to acquire and develop this site arose from general planning studies of the area between Euston Road and Camden Town, with particular reference to derelict railway land, which culminated in the production of a detailed planning brief, following public consultation in 1975.

A scheme was subsequently approved for a housing redevelopment occupying 4 acres of the site and providing 169 units fwith accommodation for 559 people; 2 shops, and a community hall. A scheme was also prepared for laying out the remainder of the site as public open space. The dwellings in 9 blocks of 2/3/4 storeys consist of 4/5-76-77-78-person houses and masonettes and 2-person flats. Warden-supported housing for the etderly is provided in the form of one block of 46 flats (serviced by lift). In addition, there are a number of ground floor flats and houses specially designed for the disabled.

The development aims to provide a more traditional street type of environment, incorporating terraces of dwellings, with access from a targety pedestrian through route. This route (Coopers Lane) runs north/south through the site.

The large family houses and maisonettes and about a quarter of the flats have their entrance at ground level and also have private gardens. Private balconies are provided for a further 20 of the smaller maisonettes, which have their entrance above ground floor level. In addition to the public open space (known as 'Somers Green'), the site also includes a row of existing light industrial arch premises along the boundary to Pancras. Road, which have been upgraded both to act as a buffer to railway and road noise and to retain this type of accommodation, with its employment potential, in the area. The scheme was constructed between 1978 and 1981.

Architect: Director of Technical Services Group Lander: David Baker/Alex Roberts Project Architect: Mike Purdy Quantity Surveyors: Robinson & Roods

Outsing Surreyors: Hobinson & Hoods Structural Engineers: Ove Arup & Panners Services Engineers: Steensen, Varning.

Mukatry & Partners

Landscape Architects: Michael Brown

Parenership

Contractors: Rush & Tompkins Ltd Total cost thousing element: £4.400.000

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