

Objection to proposed Somers Town Community Investment Programme on behalf of Camden Town District Management Committee

PLANNING APPLICATION No: 2015/274/P

At a meeting on March 9th 2016 Camden Town District Management (DMC) Committee members unanimously objected to the current CIP plans for Somers Town on multiple ground.

The remit of our DMC is not only to work with LBC officers to improve the housing-related services to tenants and leaseholders, but also to strive to improve quality of life for those living in social housing in the borough and to input into housing policy decisions

As the main responsibility of the DMC is local authority housing, we are fully conversant and understand the pressures inherent in the current housing market which fails to provide genuinely affordable homes for those on low incomes. However, we cannot support the future provision of much needed homes where we feel these are delivered at a price which we consider causes unacceptably high costs to the local environment and the health and wellbeing of our communities.

We believe it is vital that the benefits have to be carefully weighed against the losses incurred in each individual scheme and having carefully considered the pros and cons of this scheme we cannot support it in its current form.

We fully support the rebuilding of Edith Neville School. However, this cannot be at the huge social and environment cost to the majority of the community. This opinion is further reinforced by our belief that there are less damaging options available to replace the school.

We fully endorse the arguments of many of those opposing the CIP proposals. In particular we fully concur with the comprehensive arguments contained in the response from the Somers Town Neighbourhood Forum

Particular DMC concerns relate to the following:

Height of buildings:

The DMC particularly objects to the height of the proposed tower building which is entirely out of keeping with the grain of the buildings within the area. Indeed, the height of the building raises concerns relating to heritage and sight lines interrupted by the building.

Additionally the height of the 25-storey block will prevent views of heritage assets currently enjoyed.

The micro-climate associated with high buildings means long dense shadows are cast across surrounding landscape with associated chill and a wind tunnel effect. This can also mean green space lacking sunshine becomes degraded as water does not evaporate as readily.

Homes:

The proposed development will result in significant and unacceptable loss of light to many of the homes around the site area in Coopers Lane an area which suffered for many years due to the construction of the CTRL

A number of proposed blocks are sited unacceptably close to existing homes which we believe contravenes LB Camden's own guidelines in this respect. Some proposed buildings are within 12m of existing homes rather than the 18m guideline currently in operation.

Community facilities:

While fully supporting the rebuild of Edith Neville school and nursery, the DMC has concerns with regard to its funding arrangements. Unlike other Camden primary schools which are self-funding, as currently planned this project appears to receive a disproportionately high subsidy from Housing/environment. Not only is it planned to build the new premises on land designated public and private open space owned by Housing with negative consequences outlines elsewhere, the project receives additional funding through CIL and Section 106 monies received from developments elsewhere in the borough.

The DMC objects strongly to the loss of the community garden linked to the TRA Hall thus significantly reducing the replacement TRA Hall amenity. LB Camden do not propose its replacement in terms or quantity and quality. Instead an area of existing open space is to be re-designated and the community garden is lost

Open Space and Environment**Quality**

Natural environment is especially vital in a dense city environment where people have little access to open space and the associated health benefits.

Wanton destruction is how many local people view the tearing up of their precious park on Purchase Street. Even the few minutes spend in a busy day crossing through the park and woodland provides a respite and spiritual uplift. This loss is incalculable but the social value is enormous.

Replacement plans have nothing to recommend them being entirely functional, uninspiring and devoid of any rustic charm unlike that which local people currently enjoy thus completely ruining this treasured oasis of natural beauty and tranquillity so much appreciated in a dense urban environment.

The quality of what is re-provided is further degraded as much of the replacement open space is hard surface paths widened to accommodate vehicular traffic to service the new properties

Quantity

Despite figures suggesting there is a slight net increase in open space this masks the fact that the open space is fragmented and degraded with loss of trees and much increased areas of hard surfaces reducing significantly that amount of truly green open space.

Population density

Somers Town has a high child population density and lower than average access to private gardens.

The planned provision of 136 additional homes is not matched by extra public space. On the contrary it corresponds with an actual reduction though catering for increased population.

On the contrary, there appears to be a significant deficit in re-provision of community space in that that the Coopers Lane TRA Hall will lose its community garden. Proposed plans incorporate what is said to be a replacement of this facility but it is incorporated **within** the planned replacement open space and is **not additional to** it as is currently the case.

Plot 10 too is losing a significant amount of open space.

Alternative Open Space

The Turley response to objections made by the FCI state that there are alternative open spaces close by listing St Pancras Gardens, Goldington Open Space, Oakley Square Gardens and Harrington Square Gardens.

Three of the four are accessed across busy roads and the fourth is alongside a busy road therefore not safe or suitable places for younger children to play safely nor to access unaccompanied.

Additionally, for the elderly and small children living in south Somers Town these open spaces are not readily accessible.

None of the four suggested alternative open spaces has any structured playgrounds. Indeed playable green landscape is reduced within the scheme. For planners to suggest that so-called incidental play, basically linear areas alongside streets is acceptable provision for youngsters is not acceptable.

Air Quality

The air quality report accepts there is a high risk of negative impacts without suitable mitigation from this single scheme.

The lack of an Environment Impact Assessment means that the proposed build time of seven years (2016-2023) has been assessed in isolation and has thus not required LB Camden to take into account the significant impacts on air quality arising from a series of

large infrastructure schemes already in the pipeline of long duration. These include, but are not limited to, the construction of Crossrail 2, the British Library extension and High Speed 2 and associated additional generated traffic. Thus, the AQ assessment does not provide a true picture of the further inevitable deterioration in air quality which is already unsatisfactory.

No account is taken in the supplied AQ report of emissions from heating and hot water from new buildings apparently because they are considered 'off site' but they will impact the Somers Town locality. The District Heating Scheme, while providing some advantage in energy cost and provision, has negative AQ impacts in the vicinity of Pheonix Court where it is sited. The emission zone related to the DHS includes two nurseries and sheltered housing.

The AQ report does not mention the loss of trees associated with the implementation of the scheme. The removal of mature and semi-mature trees across the site will have an immediate impact on air quality totally ignored by the report.

Trees

Additional to the several hundred trees at risk in the Euston Area from HS2 construction, the ST CIP requires significant loss of trees, some of which have not been counted, eg the various fruit trees in Coopers Lane Community Garden.

If it were to go ahead this loss of trees would have an immediate negative impact on the already poor air quality in the immediate area.

In addition negative health impacts will result from reducing access to open space, natural environment and habitat. Loss of trees also affects temperature providing shade in hot weather and their roots help prevent flooding and water-logging of land.

The DMC considers this massacre of trees is alarming and both unnecessary and environmentally damaging and that tree loss should be kept to an absolute minimum across the area.

Health

The incidence of respiratory disease in south Somerstown is known to be of concern and is higher than the borough average. There exists a highly likely causal effect between this ill health and the proximity of high levels of toxic air pollution from traffic congestion (especially from Euston Road which regularly exceeds EU pollution levels and is known to be highly polluted) as well as the long-term insidious effects of decades of construction within and adjacent to the locality.

Principle of Assessment of Cumulative Impacts

The Leader of Camden Council has repeatedly been highly critical of the failure of HS2 Ltd to adequately take into account the cumulative impacts of its plans on individuals and communities arguing correctly that therefore the true costs in terms of negative impacts are not accurately reflected in the published impact assessments.

Exactly the same principle holds with the ST CIP plans which do not take into account the significant number and range of planned building and infrastructure works which together will pose even more risks to the health and well-being of individuals and communities in Somerstown.

While an EIA providing a comprehensive assessment of cumulative impacts from additional planned regeneration and infrastructure schemes in their totality which would provide a comprehensive assessment on the health and well-being of the Somers Town communities may not be strictly required, the amount and scale of what is being planned in close proximity in time and place is such that the DMC considers it would be highly irresponsible of the planning authority to progress without such vital assessment.

If LBC were to go ahead without first commissioning a comprehensive study to assess the impacts on the physical and mental health and wellbeing of those living near to the multiple developments planned not only in the immediate future but also the longer term future. this would, in our opinion, demonstrate a callous lack of their duty of care.

Additional concerns

Cumulative impacts.

An Appendix of known schemes, all of which the DMC consider should be taken into account when considering the current scheme, is attached.

Privatisation of Public Space

The DMC considers it extremely reprehensible that LB Camden is manifestly pursuing a policy leading to the privatisation of public space. This has been actively assisted by the hoovering up of land of mixed designation into 'a parcel of development land' irrespective of the negative environmental and community impacts.

Opaque process

Furthermore, although no doubt technically within planning law, the manner in which LBC carried out parts of the process is at odds with its stated policy of transparency.

Had LB Camden intended to ensure local people were kept fully informed of key components of the process they only had to circulate flyers providing such information to local organisations and display them in prominent places.

Instead, notices of intent to appropriate land were placed in the Camden New Journal amongst the classified ads. While complying with legal requirements these did not alert the public to the proposed threat of land seizures to assist with the development of a scheme that is not supported by the majority of local people and with good reasons.

No objections were received in response to notices in the classified ads in the CNJ simply because they went without notice. Had LBC ensured local people were made fully aware and understood the implications of the intention of the Appropriation of Land such awareness would have certainly triggered a response and LBC would have received many objections.

Camden Town DMC believe that the following studies and agreements should precede any planning consent of approval:

- Full Assessment of cumulative impacts to include increased traffic, air quality, reduced parking,
- Temporary Moratorium of school building until impacts of legislation regarding the Academisation of primary schools by 2022 are fully understood
- Temporary Moratorium on CIP house building until the full impacts of plans contained in the Housing & Planning legislation currently before Parliament are fully understood.
- A comprehensive Health Impact Assessment is carried out including full assessment of cumulative impacts not only of current but also planned development and infrastructure build and the impacts arising from these developments on the physical and mental health and wellbeing of the local population

Fran Heron

Chair, Camden Town District Management Committee

(comprising Amptill Square TRA, Agar Grove TMO, Bayham Place Estate TRA, Brook and Cranleigh TRA, Coopers Lane TRA, Drummond Street TRA, Godwin and Crowndale TRA, Goldington Estate RA, Mayford TRA, Ossulston TRA, Regent's Park TA, Three Fields TRA and Walker House TRA)