

# Kentish Town Neighbourhood Forum

## Response to Camden Council's Draft New Camden Local Plan

March 2024

### Introduction

Kentish Town Neighbourhood Forum (KTNF) welcomes the ambitious Vision and Objectives set out in Camden Council's draft new Camden Local Plan. There is much to applaud in the council's aim to maximise the opportunities that exist for providing new and affordable homes, and jobs, and the infrastructure required to support this, whilst seeking to ensure that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings benefits to the borough and its residents.

KTNF is pleased to note that the draft Plan supports several priorities in the Kentish Town Neighbourhood Plan, including protecting local jobs and increasing the supply of affordable housing and the following policies: SW1: Supporting small businesses; GA: Step-free access in Kentish Town stations; GO1: Local green spaces; GO2: Open spaces on estates; and SP2: Kentish Town potential development area.

However, KTNF notes that it will not be easy to achieve the Vision and Objectives and to overcome the challenges identified in the draft against the background of the current economic climate, the forthcoming changes in national planning policy and the Mayor of London's priorities.

KTNF has identified aspects of the draft plan that could be strengthened or amended to help achieve the Vision and Objectives as they apply to Kentish Town and across the borough more broadly. These are set out below. We would be very happy to provide more details where useful and appropriate.

One overall observation is that the effectiveness of the draft plan could be improved by emphasising at the beginning that the Local Plan is intended to be implemented holistically, rather than piecemeal, illustrated by more mutually supported cross-referencing to emphasise and make explicit where one spatial or thematic policy and strategy supports another.

KTNF appreciates that this is already being addressed to some extent, for example in paragraph 2.1, the introduction to Chapter 2: Development strategy. The paragraph states that the strategy "maximises the opportunities that exist for providing new and affordable homes, and jobs, and the infrastructure required to support this, whilst seeking to ensure that development is delivered in a way that is socially and economically inclusive, environmentally sustainable and brings benefits to the borough and its residents."

This is evidenced in Policy DS1: Delivering Healthy and Sustainable Development in the Development Strategy. The policy contains visionary provisions such as "Delivering buildings that achieve net zero carbon emissions, optimise resource efficiency and are

designed to be resilient to climate change” and “Maximising opportunities for enhancing biodiversity, improving access to nature, tree provision and community food growing”.

The impact could be further strengthened by stating explicitly that these provisions support the draft plan’s policies on The Natural Environment and Responding to Climate Change and that the council will only support developments that take into account all other relevant parts of the Local Plan.

Similarly, Policy CC1 - Responding to the climate emergency states: “The Council will prioritise the provision of measures to mitigate and adapt to climate change and require all development in Camden to respond to the climate emergency by: i. Supporting the retrofitting of existing buildings to make them more energy efficient and reduce the energy needed to occupy the building; ii. Prioritising and enabling the repurposing and re-use of existing buildings over demolition...” Given that this applies to all development in Camden, it would be helpful to refer to this policy prominently under Chapter 2: Development strategy.

It would also be useful to avoid contradictions in the draft Local Plan. For example, locations where tall buildings may be an appropriate form of development are identified on Map 13 below and listed in Appendix 2. Yet, the construction of tall buildings inevitably involves massive quantities of concrete and steel, whose production is a proven major contributor of greenhouse gases. This directly contradicts the ambitions of Policy CC1 - Responding to the climate emergency.

Our specific comments are detailed below.

## **Chapter 1: Vision and objectives**

### **Para 1.48**

This includes the mission: “By 2030, Camden’s estates and their neighbourhoods are healthy, and sustainable and unlock creativity.”

Whilst the draft document goes on to explain approaches to the attainment of healthy and sustainable neighbourhoods, perhaps the idea of “creativity” needs more development.

For example, estates (including new housing projects/ mixed-use schemes) should factor in less quantifiable qualities and not be afraid to list them – the production of “layered” places for interaction, reflection, and promotion of nature including bird boxes, insect houses, food growth, quiet areas, spaces where different generations might interact, play spaces which have seating and greenery, soil for digging, tables.

## **Chapter 2: Development strategy**

### **Policy DS1**

The lack of step-free access at Kentish Town Underground station is an ongoing problem that will not be solved by the current refurbishment of the escalators. This will become even more critical as sites like Regis Road and Murphy's are developed, bringing with them new housing and jobs. Lift access should be a priority and looked at in tandem with these developments, making sure transport (and all spaces) in Camden are inclusive.

KTNF requests that the council include a general principle of avoiding impermeable surfaces in the Development strategy to allow rainwater and surface water to drain and reduce flooding.

## **Chapter 4: SITE ALLOCATION – Central Camden**

### **Policy C1**

**A** “Development will be required to address issues of relative deprivation, inequality and poor health that exist in this area and deliver substantial benefit to Camden’s communities, the local area and the borough as a whole in accordance with the Local Plan and the Kentish Town Neighbourhood Plan.”

This is a welcome commitment but the Plan requires clarification on how development will address issues of relative deprivation.

### **Retail and Town Centres**

**M** “The Council will continue to support and protect the town centres of Camden Town and Kentish Town, and the Neighbourhood Centres in the Central area of the borough, to ensure they remain successful and vibrant centres that meet the needs of residents, workers and visitors in line with the retail policies in the Plan, with any additional shopping and leisure uses to be provided in accordance with Policy IE6 (Supporting town centres and high streets).”

KTNF has learned through dialogue with local businesses that current policies are making Kentish Town High Street unviable for a number of businesses, with independent retailers and chains not surviving. Some compromises on transport and parking are necessary. More use of pop-ups and meanwhile space is needed to offset non-used frontages.

**N** “Camden Town is also a key focus of the evening and night-time economy in Camden, and the Council will support efforts to widen the range of evening and night-time economy uses here, particularly where this will benefit local residents and people working night shifts, in line with the objectives set out in the Council’s Evening and Night-time Economy Strategy.”

Camden Town’s economy is increasingly straying into Kentish Town, which has positive and negative impacts. This policy needs a clause guaranteeing compromises with residents over licensing times and night-time noise.

### **Infrastructure**

**i.** “The delivery of step free access at Kentish Town Underground and Thameslink Station; and Camden Town Underground Station.” The plan should state whether this is the order of priority.

**ii.** Eastern access to Gospel Oak Overground. The plan needs to be more specific on what type of access.

**iv.** “The delivery of the Heath Line, a new green connection between Hampstead Heath and Kentish Town.” This needs more clarity about the route and possible alternative green routes if the Murphy site isn’t developed within a specific time frame.

**v.** Public realm improvements in Kentish Town Centre. More details are required.

**viii.** “The delivery of an integrated care hub.” This needs more explanation.

ix. “The delivery of new social infrastructure, including public toilets, and cultural uses, as part of the development of the Camden Goods Yard area and the Regis Road and Murphy sites.” More detail is required of what the cultural uses will entail.

**General point:** The majority of development in Kentish Town understandably is on the Murphy and Regis Road sites, but there needs to be some alternative outlets (Plan B) if either development gets blocked for a length of time.

### **ALLOCATION C2 (KT2) – Regis Road and Holmes Road depot**

#### **Development and design principles**

j. “provide substantial new, welcoming and safe open spaces and public areas, and should look to provide a new public square as a focus for the area and community activity.” The Plan needs indication where, as this is a constrained site.

“The Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 52 m considered the potentially appropriate height range.” Building height was a significant issue in the rejection of the Murphy site and 52m is too high. Medium density should be put into the wording, along with the correct layout. This would enable more homes to be gained with less local resistance.

#### **Infrastructure Requirements**

n. “Re-provision of the Recycling Centre must replace the maximum throughput achievable at the existing site”. This is a strange wording. KTNF suggests it should specify that redevelopment includes additional space to meet the growing needs of the circular economy.

p. “contribute towards improvements at Kentish Town Thameslink station (including step free access, new station entrance and enhanced town square) and Gospel Oak station (including new eastern access and improved public realm).” This involves huge investment. The Plan needs to clarify how it would be funded. For example, just through CIL or IL?

### **ALLOCATION C3 (KT3) – Murphy Site**

The draft states: “Temporary (“meanwhile”) uses can play an important role in maintaining activity on a site as a comprehensive scheme is progressed. The Council will expect a meanwhile use strategy for the Murphy site as part of comprehensive development proposals in line with considerations set out in the Kentish Town Planning Framework section on Temporary uses.”

Meanwhile uses should be free to some community groups. Developers need incentives to provide the space as they are often reluctant to do so.

#### **Infrastructure Requirements**

The plan needs to fully assess the transport implications of the constrained access to the site and reflect this in the type of employment uses provided on site. A transport strategy to mitigate the site-specific constraints should be developed, and should explore new access points, freight consolidation, servicing, and limiting traffic; existing potential transport routes, including underground on site should be explored.

n. deliver improvements to Greenwood Place; such as?

o. “Contribute towards improvements at Kentish Town Thameslink station (including step free access, new station entrance and enhanced town square) and Gospel Oak station

(including new eastern access and improved public realm).” This involves huge investment. The Plan needs to clarify how it would be funded. For example, just through CIL or IL? KTNF suggests adding the following:

- deliver significant improvements to access into the site and connections to surrounding areas; needs clarification.
- new green corridor linking Kentish Town Road and Hampstead Heath – links to the Camden Highline should be explored (even through signage).
- be designed to be compatible with, and facilitate, the development of neighbouring sites, in particular Regis Road. How will this be done - provide example?

### **ALLOCATION C5 (KT5): 369 – 377 Kentish Town Road**

#### **Infrastructure Requirements**

Development must:

c. “contribute towards the widening of the adjacent pavement and the relocation of the bus shelter to improve passenger and pedestrian safety, consistent with aspirations for a new Kentish Town Square.” Where would the bus shelter be allocated to?

### **ALLOCATION C6 (KT6): Kentish Town Fire Station**

#### **Background**

“Should the existing fire station be declared surplus to the operational needs of the London Fire Brigade, with the service being provided at another location, the site should be assessed for suitability for an alternative community use. Where it can be demonstrated to the Council’s satisfaction there is no reasonable prospect of alternative community use as part of a mixed-use scheme, the Council’s preferred alternative is development for housing including affordable homes.”

It will be necessary to keep the training tower for practical reasons and it is a local landmark. The Plan needs to specify what is meant by “alternative community use”. KTNF suggests that the Council keeps a watch on the supply and demand for these.

## **Chapter 7: Meeting housing needs**

### **Para 7.14 Ensuring homes are occupied**

Given the chronic housing shortages in Camden, KTNF welcomes the proposal to implement the maximum Government-sanctioned four-fold increase in council tax payable on homes kept empty for 10 years or more. In recognition of the urgency of the housing situation and the need to provide an effective deterrent for investors and landlords, KTNF requests that Camden Council consider further increasing the planned premiums of 100% where a home has been empty for 2 years and 200% where the property remains empty for 5 years or more.

KTNF welcomes the decision by the council on 4 March 2024 to implement a 100% premium on council tax for second homes but we urge the council to consider further increasing the premium to 200% or 300% to increase the likelihood of bringing the properties into use.

KTNF welcomes the council’s commitment to resist the development of housing for short term lets, unless it can be demonstrated to the Council’s satisfaction that the site is unsuitable for the provision of permanent self-contained housing (**Policy H1 Maximising**

**Housing Supply, bullet point iv).** It would be useful for the Plan to include an indication of how large this problem is currently and how it can be reduced.

**Para 7.113** Split sites and related sites

KTNF has some concerns about split sites when it comes to affordable housing. The provisions for affordable housing should not be inferior in terms of site and facilities that include areas given over to exterior spaces like gardens, bike/bin stores etc.

**Para 7.165**

In the case of larger housing units in affordable housing schemes, where there is a high likelihood of these being occupied by families, providing secure outdoor space is critical.

We refer back to our point under Para 1.48 to encourage the creative design of outdoor spaces to allow for multiple/layered uses with the possibility of intergenerational enjoyment avoiding separate areas for certain age groups with recreational apparatus taking up large amounts of space. Space for participation in gardening, growing of food (see Policy SC4), and preservation of nature and wildlife should be encouraged.

Concerning the scale of the development, access and readability for children, the aged and other residents, the design should create a sense of familiarity and community between areas through visual prompts including the use of colour, planting and building forms.

**Para 7.206**

In relation to Policy H9 – Purpose-built student accommodation.

High levels of private student accommodation are prevalent across Camden and other areas of London. These rooms and apartments are beyond the means of many local students and seem focused on attracting an international pool of students. Encouragement should be given to new student developments that prioritise students attending Camden colleges and Institutions rather than a pan-London approach.

The draft plan highlights this but KTNF suggests there would be a benefit in further restricting the demographic of the accommodation to students from the nearest educational institution or a single college thereby creating a closer college community but also integrating the students more substantially into the locality. A deeper connection to the area may have longer-term benefits as students may stay in the area they are most familiar with.

**Policy H2 - Maximising the supply of self-contained housing from mixed-use schemes**

KTNF is concerned that the Plan could allow a back door out of the requirement to provide permanent self-contained homes in those developments that fall under the rules. The Plan allows off-site provision and gives planners a lot of flexibility to vary the proportion of market and affordable housing, and vary the split between low-cost rented and intermediate affordable.

**Para 7.47**

The Plan states: “Exceptionally, where on-site and off-site options have been thoroughly explored and it is demonstrated to the Council’s satisfaction that no appropriate site is available for housing, we may accept a payment in lieu of provision, fairly and reasonably

related in scale and kind to the development proposed and secured by a planning obligation.”

KTNF is concerned that this may mean a loss of housing in development hotspots, such as Kentish Town, unless this is rigorously enforced by the Council. We urge the Council to enshrine in the Plan a sufficiently robust, transparent calculation (**Para 7.48**) of off-site provision and payments in lieu to ensure that the borough is not out-negotiated by developers and that Camden’s communities are provided with the extra housing they desperately need.

### **Chapter 8: Responding to climate change**

KTNF welcomes **Policy CC1** and its commitment to “prioritise the provision of measures to mitigate and adapt to climate change and require all development in Camden to respond to the climate emergency”.

KTNF suggests that the Plan include a requirement that a reference to this chapter be included at the beginning of Chapter 2: Development strategy, Chapter 7: Meeting housing needs, Chapter 9: Delivering an inclusive economy, Chapter 11: The Natural Environment and Chapter 12: Design and Heritage.

Given that developers in Camden have time and again shown their preference for building new instead of retrofitting, it would be useful to see more detail on how the council intends to implement the timely **Policy CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings**. This should include an outline of how this policy is an upgrade on policies in the Camden Plan 2017.

**Policy CC4 - Minimising carbon emissions**, is very good. However, it is somewhat undermined by the following point in **Para 827** “Where targets for embodied carbon cannot feasibly be met, a full justification will be required as part of the Whole Life Carbon Assessment.” Is it possible to delete this point altogether to emphasise that the Council is serious about meeting its embodied carbon targets?

KTNF suggests that this chapter includes a paragraph on the use of low- and zero-carbon materials such as structural wood.

### **Chapter 9: Delivering an inclusive economy**

Kentish Town has lost numerous employment premises in recent years on Kentish Town Road and surrounding streets. The major development plans for Murphy’s Yard and Regis Road could bring long term benefits for the neighbourhood if they are planned and implemented in an inclusive way. However, in the meantime, action is needed to prevent more short term loss of local employment.

Specifically, KTNF suggests adding to **Policy IE1: Growing a successful and inclusive economy** that the Council will use its planning powers to work with landlords to prioritise

supporting tenants in high street and backstreet commercial premises, with an emphasis on fair rents and to avoid land banking.

### **Policy IE3: Industry**

KTNF welcomes the aim of **Para 9.41** to reduce the footprint of distribution / logistics depots, which occupy about half of Camden's industrial land supply (c.18 ha.), including in Kentish Town. These land-hungry uses with extensive areas of vehicle parking provide relatively few jobs per square metre, which tend to be of poor quality with few prospects. KTNF urges the Council to remove "warehousing" from Policy IE3 and instead focus on protecting the supply of industrial land.

### **Policy IE6 Supporting town centres and high streets**

#### **Design and environmental quality**

xii. "expect new frontages to be well-designed in the local street..."

On this point, shop windows should be kept clear of excessive advertisements and particularly film which may cover a large percentage of the shop front window. This blank face disrupts the vitality of the high street and reduces the interaction between the street and commercial units. Where a degree of privacy is required (beauty salons etc) non-full height internal screens would be preferable, to allow the depth and scale of the shop unit along with its lighting and services to be visible from the street.

### **Policy IE8 - Gambling uses**

KTNF welcomes the commitment to resist new gambling-related uses in Kentish Town.

### **Policy IE9 - Delivery-led food businesses**

There has been a proliferation of dark kitchens in the Regis Road industrial area which causes severe noise and traffic nuisance to local residents. KTNF urges the Council to strengthen the provisions in Policy IE9 to set limits on the number of vehicle movements and hours of operation, and also to restrict the number of new dark kitchens setting up in close proximity to each other.

## **Chapter 10: Supporting Camden's communities**

### **Para 10.42**

#### **Public Toilets**

The lack of public toilets has the consequence of people using other spaces to relieve themselves – parks, walls of houses and private gardens. If, as suggested, more public toilets will be made available, resources should be allocated to the signage of these facilities, so people can find them.

## **Chapter 11: The Natural Environment**

### **Policy NE1 - Green corridors**

Bullet point x states the aim to "secure improvements to green corridors particularly where a development scheme is adjacent to an existing corridor..." This statement should be strengthened to ensure that links and green "stepping stones" are provided beyond the development schemes and into the existing built environment where there is a reasonable



possibility of establishing more comprehensive green corridors through highly urban areas such as Kentish Town.

These areas, lacking in larger green spaces, can benefit from even smaller parcels of greenery - providing visual and possibly scented green pockets for residents and workers and essential pathways for wildlife.

KTNF suggests that public information on the preferable choices of plants, bushes and trees in gardens/terraces to achieve maximum impact in the creation of these green pathways could be integrated in some way into the plan, possibly as an appendix.

## **Chapter 12: Design and Heritage**

### **Policy D2 Tall buildings**

A general comment which relates to certain policies regarding tall buildings - as highlighted for possible inclusion in Kentish Town's Regis Road and Murphy sites under Appendix 2.

Developers may propose tall buildings to achieve overall densities required to meet new housing, industry and commerce targets and allow a site to be profitable. Against this option, KTNF raises potential community detriments from the separation of residential from the streetscape (if the tall buildings turn into predominantly residential spaces). Mid-height - multi-level buildings that create a layered streetscape with a mixture of private and public green spaces, might provide more variation, visual interest and points of interaction with different sectors of the development.

Another consideration against tall buildings is that their construction inevitably involves massive quantities of concrete and steel, whose production is a proven major contributor of greenhouse gases. This directly contradicts the ambitions of Policy CC1 - Responding to the climate emergency.

#### **Para 12.32** (also para 7.23)

Housing space standards.

In the provision of space within new housing based on recommended square meterage taken from the London Plan 2019 (Table 3.1), care should be taken to ensure that the final designs do not just meet the space criteria in terms of area (as a tick-box exercise) but provide spaces that allow for a degree of flexibility in layouts and differing family groups. In other words, can the space be adapted?

#### **Para 12.130**

Street furniture and public realm.

The issue of excessive street furniture has become critical in certain areas (Kentish Town High Street for example) where pavements are narrow. Free pedestrian movement can be very difficult because of the proliferation of posts, bus stops, signage, bins etc. A clearer design strategy is required in these areas and a proactive process for the removal of excessive/non-essential items should be adopted. Bus stops in particular cause problems at pinch points causing pedestrian log jams and unsafe practices like walking out into the road. Pavement widening or relocation of stops may be necessary.

## **Chapter 14: Safe, Healthy and Sustainable Transport**

### **Para 14.24**

#### Public Transport

More integrated/multi-use bays for different scooter and bike hire companies would be beneficial. At present, pick-up/return points are often too restrictive, especially for the e-scooters, meaning that using them becomes impractical and time-inefficient.