

From: Chair WKTCAAC

Sent: 01 December 2024 09:40

To:

Subject: Re: Consultee letter for Planning Application: 2024/4887/P

Apologies for the delay in getting back to you on this. We have submitted the following text:

Thank you for the opportunity of commenting on the amended EIA in respect of the proposed West Kentish Town Estate redevelopment. Our concerns are similar to previously.

Heritage, Townscape and Visual Impact Assessment

We welcome the requirement by the Conservation Officer for additional views to enable the impact of the development to be fully assessed in respect of the impact on existing streetscape. We think that this will be worsened by the increased height of the tower.

Climate Change and Greenhouse Gases

Conservation of the fabric of our cities depends on mitigation of and adaptation to climate change. Since the scoping document was first published two years ago (2022), the risks of climate change have become even more apparent, with the IPCC¹ making clear that urgent, radical action is required now. We do not think that Camden Council has adequately taken these risks into account in the proposed development, nor developed proposals that will address them.

As reported by the IPCC in 2023¹:

Cities, Settlements and Infrastructure

C.3.4 Urban systems are critical for achieving deep emissions reductions and advancing climate resilient development (*high confidence*). Key adaptation and mitigation elements in cities include considering climate change impacts and risks (e.g., through climate services) in the design and planning of settlements and infrastructure; land use planning to achieve compact urban form, co-location of jobs and housing; supporting public transport and active mobility (e.g., walking and cycling); the efficient design, construction, retrofit, and use of buildings; reducing and changing energy and material consumption; sufficiency⁵²; material substitution; and electrification in combination with low emissions sources (*high confidence*). Urban transitions that offer benefits for mitigation, adaptation, human health and well-being, ecosystem services, and vulnerability reduction for low-income communities are fostered by inclusive long-term planning that takes an integrated approach to physical, natural and social infrastructure (*high confidence*). Green/ natural and blue infrastructure supports carbon uptake and storage and either singly or when combined with grey infrastructure can reduce energy use and risk from extreme events such as heatwaves, flooding, heavy precipitation

The current proposals will contribute to climate change by creating a large amount of 'up-front' carbon emissions. This is due to the type of construction necessary for the configuration of the buildings that are proposed: the construction of high-rise concrete framed buildings with deep concrete basements create very high levels of emissions, that will take more than 60 years to break even through savings in operational carbon. Up-front carbon emissions are of vital importance as what we do within the next few years is critical to avoiding the worst impacts of climate change.

Camden Council has not reviewed retrofit and refurbishment properly in developing these proposals. No work on the feasibility of retrofit was carried out before the residents' ballot. The study done recently has only been

carried out because it is a planning requirement. It is not thorough or conclusive.

We refer planners to research carried out into the feasibility of retrofit at West Kentish Town Estate, which can be downloaded here: <https://www.aabarchitects.co.uk/exhibition/>

Ecology

The proposals will also reduce our ability to adapt and create a resilient neighbourhood because of the impact on the existing trees, nature and biodiversity on the site. The existing trees and soil provide eco-system services which have not been properly accounted for in the assessment. Please refer to the Hero Trees of Kentish Town Estate report, which can be accessed here:

<https://www.transitionkentishtown.org.uk/portfolio/save-our-hero-trees/>

Yours sincerely

West Kentish Town CAAC

1 The Intergovernmental Panel on Climate Change was created to provide policymakers with regular scientific assessments on climate change, its implications and potential future risks, as well as to put forward adaptation and mitigation options. In the

IPCC, 2023: Summary for Policymakers. In: Climate Change 2023: Synthesis Report. Contribution of Working Groups I, II and III to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change.