Bacton Low-rise estate regeneration
Environmental Impact Assessment Scoping Opinion
Planning application ref. 2024/5383/P

This response to the planning application for an EIA Scoping Opinion is made by Queens Crescent Neighbourhood Forum (emerging). It draws on information pertaining to the extant planning approval for development on the Bacton Low-rise estate (2012/6338/P), together with the EIA Scoping Opinion application for that application.

The original application was 290 homes across two sites, SIte 1: the DHO site (0.53 ha) and Site 2: the Bacton Low-Rise estate (0.93 ha). The total area is stated in the EIA Scoping Opinion as 1.46 ha. On that basis the density of the approved scheme is 199 homes/ ha. However, when the application was submitted the site area was increased to 1.89 ha, reducing the density to 153. This was an excessive increase in site area in order to reduce the apparent density; for example it includes the whole of Haverstock Road (whereas the boundary should go down the middle of the road) .

Site 1 has now been developed with 67 new homes. With the 460 homes allowed for under the EIA for Site 2, this would bring the total to 527, an increase of over 500% above the original 99 homes.

This Planning Application, if approved, will set a dangerous precedent within an area that is targeted for major redevelopment. The area needs the right kind of housing with the right kind of density. We therefore call on Camden's planners to send a robust response to the applicant and require a return to the extant planning permitted scheme in terms of density, height and numbers of homes to be provided.

SCROLL DOWN FOR DETAILED RESPONSE TO REPORT

	Report	*Subject*	*Response*
1	**Introduction**		
1.1	Quantum	460 homes on Site 2	The proposed density is unacceptable. According to the planning report for application 2012/6338/P, the original scheme for both sites exceeded the habitable rooms figure when compared with the London Plan and supporting Housing SPG, which has a guidance density of 200-450 habitable rooms per hectare (equivalent to 45 to 170 dwellings per hectare) for an urban location with a PTAL of 2-3. The planning report confirmed that the scheme provided 290 homes with a density of 153 homes per hectare (nb. on the basis of the site area given in the EIA Scoping Opinion the density would be 199 homes/ hectare). The new proposed density with 527 homes is a density of 279/ ha for a 1.89 ha site (or 361/ ha for a 1.46 ha site). Both denisties are significantly higher than the guideline limit for a central site with a PTAL of 6 (215/hectare).
	Use	No other proposed uses	On-site employment space should be provided, as per the extant planning permission at a minimum, to replace that lost through the redevelopment. Community facilities are required
	Height	Up to 26 stories	This is unacceptable and will be harmful at many levels, as it constitutes obvious overdevelopment of the site.
1.8	Planning context	Failure to refer to SPD	No reference is made to the Gospel Oak and Haverstock Community Vision, which is a planning framework for the area adopted by LB Camden in December 2022 as Supplementary Planning Guidance. The framework envisages an additional 215 homes to be provided by the overall Bacton Estate redevelopment. 215 (new) + 99 (existing)= 314 homes as current amended extant planning permission for both sites.

1.9	Planning context	New draft Local Plan 2024	The New draft Local Plan 2024, refers to the currently undeveloped Site 2 as C22. This confirms appropriate height and number of homes for development of this site. Regarding height it says that a height of 40m may be possible. At a typical floor to floor height of 3.2m this would be 12-13 stories. The proposal under the current EIA Scoping Opinion is double that (up to 26 storeys), so is obviously unacceptable. The number of additional homes is given as 148 above the previous existing (99), ie 247. The applicant tries to imply that this should be read as 148 additional homes above the planning permission granted in 2013: The report refers to "148 additional homes [to that granted under the Operative Permission]. This is erroneous and misleading. 148 (new) + 99 (existing) = 247 (the numberof homes for Site 2 in the extant planning application as amended by a Minor Material Amendment of 2020).
		Buildings Height Study, Jan 24	Site SA03 - BLR - recommends a potential height range between 12-40m or 3 to 12 storeys
2	**Site and Setting**		
2.3	Brownfield land'	Status of land	The land is not a brownfield site; it is not on Camden's register of brownfield site. It is a site that is in the process of development, which is currently paused. The existing site should be taken to be the same as the extant planning permission (see item 11: Biodiversity).
3	**Description of the Development**		
3.4	Affordable housing	30% affordable, 70% market by habitable room	This is not policy compliant and should be 50% for a publicly owned site. The extant permission has 44% affordable on the basis of floorspace, and this should be matched. A high proportion of small expensive flats will not serve local need or help foster community.
4	**EIA Methodology**		
4.1	Baseline and Future Baseline Conditions		The baseline should be the same as the baseline for the extant planning permission 2012/6338/P, not the current degraded state of the site.
6	**Noise and Vibration**		

6.6	Vibration Receptors		Measurements should be taken on the flank wall of the vicarage. It is a different type of construction than Cherry Court and may be more susceptible to damage. More than one receptor is needed on St Martins church. This is a Grade I listed building and needs extra risk mitigation measures, eg. monitoring on three sides of the building including the tower, and internally.
9	**Heritage, Townscape and Visual Impact Assessment**		
			The site is visible from a wide distance, including Hampstead Heath and Camden High Street. In any location where the existing Bacton tower is visible, there will be an impact. Bacton Tower has good proportions, and unfortunately the addition of three additional high rise buildings next to it will cause a combined solid mass of building on the skyline. See example of a mocked-up view from Hampstead Heath (www.westkentishtown.org/2024/12/05/life-on-mars/). More views are required from a wider distance. Views from all over Hampstead Heath are important, not just Parliament Hill.
10	**Cumulative Effects**		
			The applicant omits a number of significant anticipated developments within the 1km radius, including: - Regis Road Industrial Area, development agreement between LB Camden and Yoo Capital, subject to a revised planning framework currently in the proceess of being developed - West Kentish Town Estate Regeneration, current planning application 2024/4887/P - Wendling Estate Regeneration, neighbouring site These sites are covered by adopted planning frameworks for 2078 new homes, which need to be taken into account.
11	**Non-significant topics**		The long list of proposed issues to be excluded shows the developer's lack of care and responsibility

		Socio-economics	The baseline should be the same as the baseline for the extant planning permission . Housing tenure should be included under this section. The increased in polulation is significant and local demand on education, healthcare and other demand for community facilities should be included. Local workspace should be included.
		Biodiversity	As item 2.3, the site is not a 'brownfield site', and the baseline should be the same as per the extant application. The ecological surveys provided for application 2012/6338/P should be used.
		Climate Change and Greenhouse gas emissions	The large amount of carbon emissions resulting from the construction should be taken into account. Carbon emissions resulting from building is a key contributor to climate breakdown, which is an imminent threat to the stability of society and the UK's ability to feed and sustain its population. Residential development should be designed to minimise the carbon footprint of construction, as the harm caused will not be off set by potential savings in operational carbon for 60-100 years. New buildings should be designed to minimise the amount of concrete, for example, by avoiding carbon intensive construction such as basements.
		Climate Change resilience	It is well known that high-rise buildings are high risk and high cost when it comes to future maintenance and operation. With future ecoconomic instability caused by Brexit and Climate Change, the ability for building owners to maintain and service lifts and other services in high rise buildings will worsen. This needs to be taken into account. This development will contribute to the heat-island effect, causing localised raised

		Human Health	There is a risk that the CMP will be ineffective in mitigating the risk of construction, particularly in respect of the care home and residents of Wendling Estate. The mental and physical health of future of occupants of high rise buildings should also be taken into account. This has been documented in publications such as the 2023 report into High-Rise Housing, introduced by Nigel Hugill Chief Executive Officer, Urban and Civic and Chair, Centre for Cities. The mental health of occupants living around the site should also be taken into account, as they will have to contend with loss of day-light and privacy, and increased air temperatures and wind speeds.