

Laura Dorbeck

From: Queens Crescent Neighbourhood Forum <[REDACTED]>
Sent: 15 January 2023 09:09
To: Laura Dorbeck
Cc: Jenny Mulholland (Cllr); Kemi Atolagbe (Cllr); Nasrine Djemai (Cllr); Rebecca Filer (Cllr); Lorraine Revah (Cllr); Marcus Boyland (Cllr); Davis, Edward; Tom Little; Transport Strategy; Katherine Frost; Amanda Jootun; David Houghton; [REDACTED]
Subject: QNCF's Objection to Planning Application 2022/5218/P

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Dear Laura Dorbeck,

Re: Planning Application No: 2022/5281/P - West Kentish Town Estate – Environmental Impact Assessment Scoping Opinion Request

Queen's Crescent Neighbourhood Forum objects to the scope of the EIA for the following reasons:

1. Gross overdevelopment

The number of proposed homes is 898, an extra 582 to the 316 on the estate at present. This contravenes Camden's own draft Site Allocations Plan, which states the estate has capacity for 484 additional new homes. The resulting scale, massing and layout is incompatible with the area.

2. Tenure

Tenure is not policy compliant. Ideally 50% of the total extra units should be affordable. The number of social homes proposed is only 31% of the total 898, but as the majority of these are replacement homes only 3% of additional 582 homes are social homes.

3. Mix of unit size

The mix is not policy compliant. The scheme should achieve a mix overall of: 1 Beds – no more than 20%, 2 beds – 30% (mix of 2b3p and 2b4p units), 3 beds – 30%, 4 beds – 20%.

4. Community fragmentation

The length of construction, (15+ years) in eight phases, will lead to the destruction of the estate's community and create sustained noise, disruption, site traffic and dust for the entire neighbourhood.

5. Existing condition

The existing estate suffers from ongoing lack of investment and maintenance; leaking roofs, condensation, poor thermal performance, and lack of proper ventilation. LBC use this to suggest the buildings are irredeemable and not capable of being refurbished. What happens to the later phases of the estate while they await their redevelopment?

6. Alternatives and design evolution

No viable and reasonable alternative to total demolition was offered at the time of the residents' ballot. LBC asserts that residents voted overwhelmingly for demolition and rebuilding. There's evidence tenant residents saw this option as the only way out of dire living conditions in poorly maintained and overcrowded flats.

7. Noise and vibration

The EIA proposes that both potential noise and vibration effects during the operational phase, and an assessment on operational road traffic noise are scoped out. No supporting data to this statement is offered and for such a huge development must be included.

8. Socioeconomics

The EIA proposes that an assessment on; a) end-use employment, b) Dentists, Nurseries, Leisure and other Community Facilities, c) Crime, are deemed not likely to be significant and are scoped out. There is no supporting data to these statements and must be included for such a huge development in one of the most deprived areas of London.

9. Public Health

The impact on health as a result of an increased population and how the scheme will promote good physical and mental health needs to be assessed, eg. the existing games court is to be removed and replaced so will need to meet the requirements of the National Planning Policy Framework (NPPF). If existing sports facilities (eg. Talacre) do not have the capacity to absorb the additional demand, then new and/or improved sports facilities should be provided.

10. Heritage, townscape and visual impact

The current over-development and scale of the proposals will adversely affect designated heritage assets, (conservation areas, listed and locally listed buildings etc), their setting and significance both around the site and across a very large area to some distance. In line with the NPPF, a thorough assessment of the likely effects is essential.

11. Daylight, sunlight, overshadowing

Due to the scale of development it is important to identify which properties both within and adjacent to the estate, would experience light changes above 20% rather than vaguely state that they may experience unacceptable overshadowing. The proposed design also destroys open sided, publicly accessible/viewable landscape, replacing it with deep-set courtyards surrounded by tall blocks. These will receive no/minimal sunlight and will be no use as gardens or social spaces. The high level of lighting proposed to the public spaces will also fundamentally alter the quality of the area and create light pollution.

12. Water resources, drainage and flood risk

These must be scoped in. EA's Water Stressed Areas report (2021) notes the site suffers from 'serious water stress', i.e., the availability of mains drinking water supply is limited. The development will also increase the load on the existing foul sewage network. A thorough consultation with Thames Water on capacity and constraints on foul and surface water is fundamental.

13. Traffic and Transport

Traffic and Transport must be scoped in. The increase in deliveries/van traffic will not be insignificant as claimed and ignores the substantial change to traffic patterns adjacent to the site as a direct consequence of the partial pedestrianisation of Queen's Crescent and changes to Holmes Road. TFL has noted the scheme may have significant impacts on surrounding public transport networks and will want to see; a Healthy Streets Transport Assessment, an Active Travel Zone assessment and the proposals support the strategic aim of the Mayor's Transport Strategy.

14. Waste and materials

Waste and materials must be scoped in. Total demolition and rebuilding results in the most detrimental effects relating to materials, waste and carbon emissions. Refurbishment as a primary mitigation measure was not adequately argued or assessed by LBC or presented to residents as a valid choice. No consideration has been given to the impact on surrounding streets for site traffic during construction or waste collection in operation.

15. Ecology and Biodiversity

The existing mature landscape, trees and greenspace in and around the WKTE all contribute significantly to the setting, and its connection and relationship to the neighbourhood. The proposed privatisation of these spaces and the destruction of around 80 mature trees, which have a value (biodiversity, carbon capture, cooling, air purifying), that far exceed newly planted trees, is completely unacceptable. This contravenes LBC's declaration of a Climate and Ecological emergency and Natural England guidance, "Green infrastructure is a natural capital asset that provides multiple benefits, at a range of scales. For communities, these benefits can include enhanced wellbeing, outdoor

recreation and access, enhanced biodiversity and landscapes, food and energy production, urban cooling, and the management of flood risk. These benefits are also known as ecosystem services.”

16. Geo-Environmental

This must be scoped in. Hearsay notes there are tributaries of the Fleet across the site, not all of which are culverted. The Acting Contaminated Land Officer has commented; “Historical industrial land uses have been identified on site and immediately adjacent to the site... There is also the potential for elevated concentrations of heavy metals (primarily lead) within the background concentrations of Camden soils. Previous development has historically occurred on site, and hence there is the potential for made ground and associated contaminants of concern beneath the site.” A Land Contamination Risk Assessment has therefore been requested.

Yours sincerely

Queen's Crescent Neighbourhood Forum