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Sent: 18 January 2023 21:15
To: Planning Planning; Laura Dorbeck
Cc:

Subject: Re: Comments on Planning Application 2022/5218/P -
Environmental Impact Assessment Scoping Opinion Request

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Dear Planning Team

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

I have spent some time talking to residents and neighbours of the Estate, in formulating the views below. **In summary, will the Council after reading these 10 points consider a much more ambitious and humane approach to its environmental aims than the proposed draft approach?** Such an approach is possible, and there are many, many local voters who are ready to help the Council do much better, without breaking the bank. The sections ***in bold and italics*** are questions for the Council to consider and respond to.

Please acknowledge safe receipt.

Yours sincerely,
Marc Dautlich

1. Low number of affordable homes

The proportion of affordable/social homes proposed is less than one third of those proposed to be built. This is very low. ***How can the Council improve this?*** It does not appear in keeping with the Council's own policy aims.

2. Family-friendly unit sizes

Why is such a low proportion of the proposed units in the 3 or 4 bed category? The proposed mix does not appear to have any ambition to foster an environment that is meaningfully family-friendly. Again, it does not appear in keeping with Camden's own policy aims. It reads as if the Council has already decided it cannot afford to procure something more ambitious.

3. Maintenance and living conditions in existing homes

There is a widespread feeling around the Estate that existing homes are not being properly maintained. ***Will the Council provide figures about the year-on-year spend on maintaining existing homes?*** There have now been reports in the mainstream press of horrific conditions in some housing in the UK, and even - tragically - the death of a child as a result of mould in poor housing. Yet the Council's development plan assumes a period of more than a decade of construction. ***How will the Council provide for the safe accommodation of existing tenants during this very lengthy period?***

4. Meaningful alternatives

No meaningful alternative to knocking down the entire Estate and rebuilding it has been offered to residents. Tenants are very concerned that they have accidentally accepted in principle a rebuild scheme that is not really in their interest. The Council has offered no viable alternative to complete demolition. In effect, tenants were left understanding that there is no alternative, and that the Council would simply continue to decrease spending on maintaining their existing homes until they are unsafe to live in. ***What evidence will the Council share, that it has properly assessed its legal obligation to provide effective maintenance of existing homes?***

5. Public Health

Will the Council provide an assessment of the health effects of such a large increase in population density, and plan to provide new sports/outdoor facilities based on that assessment? There is a growing feeling amongst residents that the reduced space inherent in the proposed plans will negatively impact the physical and mental health of residents. This is particularly so after the experience of the recent Covid 19 pandemic. I could not find evidence of proposed replacement of existing outdoor space, let alone any increase in such space, as the pandemic has surely demonstrated is essential to wellbeing.

6. Water resources, drainage and flood risk

Please can the Council clarify what evidence there is to support leaving out such an important consideration when the EA's Water Stressed Areas report (2021) notes the site suffers from 'serious water stress'? Will the Council commit to a detailed consultation with Thames Water about these considerations?

7. Traffic and Transport

Traffic and Transport must form part of the scope. The proposed plans will lead to an increase in traffic, potentially a very large increase. Traffic patterns will change with the partial pedestrianisation of Queen's Crescent.

8. Waste and materials

It is difficult to follow the Council's reasoning why waste and materials do not form part of the scope. ***Please can the Council provide some evidence for its assertions that this is not necessary?*** Total demolition and rebuilding will result in the most detrimental effects relating to materials, waste and carbon emissions. Refurbishment as a primary mitigation measure was not adequately argued 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.

9. Ecology

It is very disappointing how little environmental ambition is in evidence in the proposed plans. Today there is a mature landscape, trees and green grass in significant amounts in and around the Estate. The proposed plans involve the destruction, as we understand it, of around 80 mature trees, which have a value (biodiversity, carbon capture, cooling, air purifying), that far exceeds newly planted trees. Surely the Council does not consider that this destruction in any way contributes to tackling LBC's declaration of a Climate and Ecological emergency? ***What evidence can the Council provide as to how it has quantified in its plans the guidance given by Natural England?*** "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."

10. Substantial 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. The EIA proposes that assessment of (i) End-use employment (ii) Dentists, Nurseries, Leisure and other Community Facilities and (iii) Crime, is deemed not likely to be significant; these considerations are therefore excluded from scope. ***Please can the Council provide supporting evidence for this conclusion?*** Pending that, it is obvious that these considerations must be included for such a huge development in one of the most deprived areas of London.