

Site Allocations Local Plan

CONSULTATION FEEDBACK ON ENERGY AND RESOURCES



November 2022

As part of the further consultation on the Site Allocations Local Plan in December to January 2022, we asked for specific comments on climate and resource issues. Since initial consultation and engagement in 2020 Camden had declared a climate emergency and adopted a new Climate Action Plan. There had been significant changes to the national planning system and a new London Plan had been adopted.

As a development plan document, the Site Allocations Local Plan has the potential to include new strategic policies and/or replace existing ones, in addition to setting out the Council's preferred approach to growth areas and key sites across Camden.

We therefore we consulted specifically on how the Plan could tackle climate change in Camden using the Commonplace consultation platform.

A summary of the responses we received is set out below.

Background Information section

This provided information on the Site Allocation Local Plan, including details of previous consultation.

Question: Do you have any general comments about the Plan or the plan making progress so far?

9 residents and Climate Emergency Camden responded to this question and their comments are summarised below. Comments are from residents unless noted.

- Change relationship between landowner and tenant to ensure that landowners are held accountable and responsible for implementing changes.
- Empower local cooperatives ensuring their knowledge is used to inform housing and large scale developments.
- More details on sustainability, including borough wide green energy, food systems, circular economy, green skills, travel, and community engagement. (2 responses)
- The Plan needs to be rewritten considering climate and ecological emergency. (Climate Emergency Camden)
- Question the methodology of consultation and its effectiveness in reaching particular groups. (3 responses)
- Will the consultation make a difference to the outcome of the Plan? (3 responses)

Climate Crisis in Camden section

Camden's Climate Action Plan was developed following an extensive community engagement process, it creates a framework for action across all aspects of the borough with the aim of achieving a zero carbon Camden by 2030.

Question: What actions should new development sites coming forward in Camden prioritise to help combat climate change?

15 residents and Camden Climate Emergency responded to this question and their comments are summarised below. Comments are from residents unless noted.

Existing buildings

- Where possible sites should be refurbished rather than being demolished. (4 residents and Climate Emergency Camden)
- Careful removal of existing buildings to allow reuse of materials - circular economy principles. (2 residents and Climate Emergency Camden)
- Retrofitted and new buildings must meet required standards to enable Camden to reach its zero carbon goal.
- Retrofitting for zero carbon (1 resident and Climate Emergency Camden)

Transport measures

- Ensure there is infrastructure for active travel such as safe cycle storage and electric vehicle charging points. (5 residents)
- Make segregated cycle lanes.
- Use electric vehicles for construction.

Other specific suggestions / priorities

- Ensure developments are powered by local renewable energy, solar power, wind. (4 residents and Climate Emergency Camden)
- Stop enabling high rise buildings that provide little affordable housing and are not sustainable for Camden residents or the planet. (Climate Emergency Camden)
- All new development sites should be subject to a full Environmental Impact Assessment.
- Prioritise low embodied carbon.
- Use 15 minute city thinking to design development.
- Green roofs.
- Ban the cutting down of trees and protect green spaces for wildlife and the local community. (Climate Emergency Camden)
- If new build it should be passivhaus standard.
- High standard of insulation. (2 residents)

General comments

- Avoid any flammable materials
- Lobby government for investment in suitable grants for appropriate insulation.
- Be aware of the potentially toxic costs of going green, cobalt absorption and negative effects on African countries.
- Focus on other priorities such as bin collections and social care.
- Lights in common areas and quiet roads should be on motion sensors.

- Encourage more gardening.
- Banks of bricks is the cause of pollution in Camden.
- Require new development sites to ban the use of glyphosate and other pesticides. (Climate Emergency Camden)

Question: Are there any suitable sites to be allocated in the Site Allocations Local Plan that you think could do more to help ease the climate crisis in Camden? If yes state which site and your suggestions

11 residents and Climate Emergency Camden responded to this question and their comments are summarised below. Comments are from residents unless noted.

West Hampstead Interchange

- The policy should stipulate a design code to be developed before an application is submitted.
- The site is located in an area with the highest green space deprivation scores – opportunity to help mitigate this with new green infrastructure.
- Clear parameters established to avoid tensions between capacity, building heights, quantum of natural green space. (Climate Emergency Camden)

O2 West Hampstead

- The building should not be knocked down. (1 resident and Climate Emergency Camden)

British Library

- Retain recent extension.

West Kentish Town Estate

- The proposals involve felling of trees and building on existing garden space, this could increase flood risk. Existing trees and green space should be protected
- These estates are due for demolition, this must not be allowed. Demolition is damaging for the environment and for people. There must be a proper design for a retrofit option. (1 residents and Climate Emergency Camden)

Ludham and Waxham Estate

- Solar panels on their roofs. (2 residents)

Kentish Town

- Proposals are based on dense, high carbon, mostly high rise construction with little green space. The proposals are in direct contradiction to the Council's pledge to tackle Climate and Ecological Emergency. (Climate Emergency Camden)
- Murphy's Yard - More information requested, assumed overdevelopment.

General comments

- Before expanding growth areas, and intensifying existing growth areas, for the sake of 'growth', far more analysis needs to be done to establish the current provision of business space and homes in the proposed growth areas. (Climate Emergency Camden)

- There needs to be much more emphasis on existing buildings within the plan, not just 'sites'. (Climate Emergency Camden)
- All sites should be assessed for reducing embodied carbon impacts taking into consideration soil conditions, building typologies, transportation, and energy use.
- Include a register of all significant buildings in Camden that have the potential for deep retrofit, and a proposed timeframe for carrying out this development to meet the UK's climate change mitigation targets.
- King's Cross - reduce traffic, work in conjunction with waterways to green the canals.
- The area around Gospel Oak station is dangerous for cyclists.
- Build more houses and flats for people to live in.

Climate Emergency Camden also made the following comments on growth areas:

Holborn and Covent Garden

- The designation as a 'growth area' appears to mean that what would normally be refused for a range of proper planning policy reasons, such as protecting the historic built environment, are ignored.

Camden Goods Yard

- It is overly dense and badly planned (confirmed by the Camden Design Review Panel), resulting in narrow public spaces which will be overshadowed, insufficient greenspace and high-carbon construction.
- Planning policy should constrain development to what can be shown to be needed for a comprehensive plan to meet Camden's actual need, and to meet the challenge of the Climate and Ecological Emergency.

Climate Emergency Camden also commented that:

- The following sites should be retrofitted: 1 Museum Street; Former St Martins; Wendling Estate; and West Kentish Town Estate.
- If all these buildings were retrofitted instead of being demolished and rebuilt the saving in CO₂ emissions would be in the region of 250,000 tonnes. This should be a planning consideration but is not being considered at present. Developers are not generally asked to provide retrofit options for consideration, and if they do the proposals are not properly scrutinised.
- The following areas and sites should include an added requirement for low carbon construction:
 - Camden Goods Yard
 - Camley Street and St Pancras Way
 - Kentish Town Area
 - West Hampstead Interchange
 - Individual development sites.

Climate mitigation section

Climate mitigation is about reducing climate change, its scale and effects, through reducing emissions of greenhouse gases.

Question: What should the top three priorities for climate mitigation be in Camden?

16 residents, Climate Emergency Camden, and Redington Froggnal Neighbourhood Forum responded to this question and their comments are summarised below. Comments are from residents unless noted.

Existing buildings

- Prioritise refurbishment over demolition for all development sites (3 residents, Climate Emergency Camden)
- Retrofit public and private housing. (3 residents,, Climate Emergency Camden)
- Retrofit to a high standard.
- Insulation to prevent heat loss. Enable householders to upgrade their homes with insulation, external insulation and replacing difficult to insulate butterfly roofs. (6 residents)
- Offer streets or buildings the chance to have estimate and work done to insulate buildings. Arrange this with a number of trusted suppliers.
- Listed buildings. Planning laws must change to allow greater window insulation.

New buildings

- Low embodied carbon targets for new buildings, only to be built where necessary.
- Passivhaus standard.
- Buildings should be zero carbon.
- Reduce carbon emissions.

Resources

- Increase recycling and reuse to promote the circular economy. (2 residents, Climate Emergency Camden)
- Work towards a waste tax that includes empty properties, large consumer goods, any goods with in-built obsolescence, all physical packaging and marketing materials. (2 responses)

Renewable energy and decentralised energy

- Solar generation expansion. (2 residents)
- Larger scale solar systems on community buildings, smaller ones all new dwellings, and retrofitting older ones.
- Offer streets or buildings the chance to have estimate and work done to install solar panels, with assurance of whether planning permission is required or not. Arrange this with a number of trusted suppliers.
- All schools should have solar panels.
- Investigate possibility of local decentralised energy.

Greening and biodiversity

- Increase the amount of natural soft surfaces. (Redington and Froggnal Neighbourhood Forum)

- Increase trees and canopy cover. (Redington and Frogna! Neighbourhood Forum)
- Plant wildlife hedgerows. (Redington and Frogna! Neighbourhood Forum)

Transport

- More electric buses.
- Better walking routes.
- Dedicated bike lanes. (2 residents)
- Incentives to encourage walking, cycling and use of public transport. (2 residents)
- Reduction of non-electric vehicle movements.
- Greater use of electric vehicles for commercial use and building site work.
- Street lights on motion sensors.
- Work with TFL for buses running through Camden to be all electric, but hybrid as a first step.
- Investigate permeable surfacing for pavements, roads and playgrounds.

Question: What specific points relating to climate mitigation do you think should be included in the Site Allocations Local Plan

11 residents, Climate Emergency Camden, and Redington Frogna! Neighbourhood Forum responded to this question and their comments are summarised below. Comments are from residents unless noted.

Existing buildings

- Prioritise refurbishment for all development sites, instead of demolition and new-build. (1 residents, Climate Emergency Camden)
- Retrofit public and private housing for zero-carbon heating and hot water. (Climate Emergency Camden)
- Planning needs to change to allow listed buildings to update their policy on the glass used.

New buildings

- In Camden, new buildings continue to be built with high embodied carbon materials, structural concrete frames, an example is Highgate Newtown. (Climate Emergency Camden)
- The embodied carbon targets included in the London Plan are not sufficiently ambitious and should be increased by Camden planning policy. (Climate Emergency Camden)
- GLA's whole life carbon methodology is often used to justify high initial carbon emissions caused by construction over a 60 year span. This enables developers to continue to build high-carbon construction in the next 10-20 years, which is the very time we should making radical reductions. (Climate Emergency Camden)
- Stop enabling over-dense, high-rise buildings that provide little affordable housing and are not sustainable for Camden residents or the planet. (1 resident and Climate Emergency Camden)

- Include requirements for the use of low carbon impact and ecologically beneficial materials in designated development areas based on building typologies. (1 resident, Climate Emergency Camden)
- Require new development sites to incorporate comprehensive recycling and reuse facilities to promote the circular economy. (1 resident, Climate Emergency Camden)
- Include an assessment of development areas based on the potential embodied carbon impacts taking into consideration soil conditions and building typologies as well as transportation and energy use.

Renewable energy

- Require all development sites to source all electricity and gas from renewables. (3 residents, Climate Emergency Camden)
- No decentralised energy networks unless they are from renewable green sources.

Greening / biodiversity

- Ban the cutting down of trees. (1 resident, Climate Emergency Camden)
- Protect Camden's green spaces and increase them to benefit wildlife and the local community. (1 resident, Climate Emergency Camden, Redington Frogna! Neighbourhood Forum)
- The benefits of green infrastructure are significant, reducing heat island effects, particulate filtration, carbon sinks, and to maximise ecosystem services. (Redington Frogna! Neighbourhood Forum)
- Cooling and shading by natural means, with targets for tree and hedge planting to be established for each site allocation. (Redington Frogna! Neighbourhood Forum)
- Seize opportunities to incorporate natural water features.

Transport

- Reducing the parking available could encourage more people to use public transport.
- Electric charging points on street lamps.
- Permeable surfaces where possible. Roads, playgrounds, pavements.
- Safe cycle routes.

Question: Do you have any other comments about climate mitigation in Camden?

9 residents, Climate Emergency Camden, and Redington Frogna! Neighbourhood Forum responded to this question and their comments are summarised below. Comments are from residents unless noted.

Greening / Biodiversity

- The concreting over of natural green spaces and consequent habitat loss must cease. (Redington Frogna! Neighbourhood Forum)
- SUDS, trees, and hedges to be specified per inhabitant for all allocated sites (1 resident, Redington Frogna! Neighbourhood Forum)

- Existing buildings should be retrofitted with vegetated façades and wildlife roofs. (Redington Frogna! Neighbourhood Forum)

Other comments

- All roads and paving should be permeable, with swales and green habitats. (Redington Frogna! Neighbourhood Forum)
- There has been a lack of discussion about how different departments within the Council can work individually and collectively to tackle the whole spectrum of carbon emissions (1 response, and Climate Emergency Camden)
- Do not permit new buildings to be demolished.
- Current building stock needs to be improved by retrofitting.
- Only build where necessary, simple structures that last and require less maintenance.

Climate adaptation section

Climate adaptation is concerned with ensuring our environment and buildings are able to cope with a changing climate.

Question: What should the top three priorities for climate adaptation be in Camden

6 residents, Climate Emergency Camden, and Redington Frogna! Neighbourhood Forum responded to this question and their comments are summarised below. Comments are from residents unless noted.

Existing buildings

- Retrofit where possible and minimise demolition and new build.
- Retrofit public and private housing. (1 resident, Climate Emergency Camden)
- Address flooding, overheating, and damp.
- Retrofitting to Enerphit standards.
- Insulation. (2 residents)
- New buildings.
- Sustainable building design.
- Sustainable food system.

Greening / biodiversity

- Ban the cutting down of trees. (Climate Emergency Camden)
- Maximise greenery and increase the amount of natural soft surface. (1 residents, Redington Frogna! Neighbourhood Forum)
- Increase tree cover. (1 resident, Redington Frogna! Neighbourhood Forum)
- Plant wildlife hedgerows. (Redington Frogna! Neighbourhood Forum)
- Enhance biodiversity.
- Planting to help flooding and drought.
- Maintenance of existing green spaces.

Other comments

- Require all development sites to source all electricity and gas from renewables.
- Generate solar where possible. (2 residents)
- Ensure all drains do their job

Question: What specific points relating to climate adaptation do you think should be included in the Site Allocations Local Plan

4 residents, Climate Emergency Camden, and Redington Frogna! Neighbourhood Forum responded to this question and their comments are summarised below. Comments are from residents unless noted.

Existing buildings

- Prioritise refurbishment for all development sites, instead of demolition and new-build. (Climate Emergency Camden)
- Retrofit public and private housing. (Climate Emergency Camden)

New buildings

- Stop enabling over-dense, high-rise buildings which provide little affordable housing and are not sustainable. (Climate Emergency Camden)
- Require new development sites to ban the use of glyphosate and other pesticides. (Climate Emergency Camden)
- Require new development sites to incorporate comprehensive recycling and reuse facilities to promote the circular economy. (Climate Emergency Camden)

Water

- Grey / rainwater harvesting. (2 residents)
- Water use.
- Renewable Energy.
- Require all development sites to source all electricity and gas from renewables. (Climate Emergency Camden)

Greening / Biodiversity

- Ban the cutting down of trees. (Climate Emergency Camden)
- Urban greening is essential. Protect Camden's green spaces to benefit wildlife and the community. (1 resident, Redington Frogna! Neighbourhood Forum, Climate Emergency Camden)
- All development should increase natural green space. (Redington Frogna! Neighbourhood Forum)
- Enhancing biodiversity and green space for food growing.

Transport

- Minimise the need for cars and maximise walking and cycling by providing safe routes and step free access to transport hubs.

Question: Do you have any other comments about climate adaptation in Camden

6 residents, Climate Emergency Camden, and Redington Frogna! Neighbourhood Forum responded to this question and their comments are summarised below. Comments are from residents unless noted.

Existing buildings

- Existing buildings should be retrofitted with vegetated façades and wildlife roofs (Redington Frogna! Neighbourhood Forum)
- A programme of support and education to all residents (not just Council tenants) about housing insulation and effective energy use will be crucial

Greening / biodiversity

- Concreting over natural green space must cease and new wildlife habitat created (Redington Frogna! Neighbourhood Forum)
- Natural greening including SUDS, trees, and hedges per inhabitant (Redington Frogna! Neighbourhood Forum)
- Provide funding for community to take action in their areas to enhance biodiversity and grow food

Other comments

- Condition all new buildings to have renewable energy.
- There has been a lack of discussion about how different departments within the Council can work individually and collectively to tackle the whole spectrum of carbon emissions. (1 residents, Climate Emergency Camden)
- Adaptation sounds like a cop out. It should only be a last resort if we cannot reverse the current situation.
- Bring back land value tax, for those who want ownership of land.
- All roads and paving should be permeable. (Redington Frogna! Neighbourhood Forum)

Resource Use section

Resource use is where consumption and waste are minimised, and retention and re-use is maximised.

Question: What should the top three priorities for resource use be in Camden?

8 residents and Climate Emergency Camden responded to this question and their comments are summarised below. Comments are from residents unless noted.

Existing buildings

- Prioritise refurbishment for all development sites, instead of demolition and new-build. (3 residents, Climate Emergency Camden)
- Retrofit public and private housing. (2 residents, Climate Emergency Camden)

New buildings

- Require new development sites to incorporate comprehensive recycling and reuse facilities to promote the circular economy. (1 resident, Climate Emergency Camden)

Other

- Any building to include green energy generation.
- All four areas listed should be emphasised in planning applications.
- Circular economy in all resources. Focus more on reduce, reuse and recycle (4 residents)
- Drastically reduce demolition.
- Avoid carbon footprint of new build and tax empty properties. (2 residents)

Question: What specific points relating to resource use do you think should be included in the Site Allocations Local Plan?

7 residents and Climate Emergency Camden responded to this question and their comments are summarised below. Comments are from residents unless noted.

- On-site waste facility encouraging re-use, upcycling, composting. (2 residents)
- Embodied carbon in demolition and construction.
- Provision of allotments, outdoor green space.
- We support the Council's exploration of transforming buildings over demolition, maximise reductions in embodied carbon, minimise waste and supporting reuse, circular economy principles. (1 resident, Climate Emergency Camden)
- Take stronger action to protect trees and enhance green spaces to support biodiversity. A comprehensive approach to tackling Climate and Ecological Emergency. (1 resident, Climate Emergency Camden)
- Best practice renewable, Enerphit, and passivhaus technology is there. Camden needs to demonstrate it can do it.

Question: Do you have any other comments about resource use in Camden?

6 residents and Climate Emergency Camden responded to this question and their comments are summarised below. Comments are from residents unless noted.

- It is useful to know that the Council's adopted Development Plan already has a range of policy points that focus on resources. However, in practice, these are rarely adhered to. We welcome the stronger policies the council is exploring. It is now essential that the Council introduces these stronger policies urgently and brings in measures to ensure they are complied with, including an independent expert scrutiny mechanism. (1 resident, Climate Emergency Camden)
- Camden needs to prioritise public benefit over private profit.
- Better engagement with communities especially from diverse backgrounds to educate on reduce, reuse and recycling.
- Consultations are a waste of resources unless it results in EnerPhit, green energy generating buildings.
- Stop bank borrowing; print money for specific green jobs.