

Camden Council: Draft New Local Plan Response from Camden Green Party

13th March 2024

Camden Green Party welcomes the opportunity to respond to Camden Council's consultation on its Draft New Local Plan. Broadly we welcome the plan, though there are a number of areas where we think the plan could and should be strengthened, as we have set out below.

Housing

- Camden's ambition to build 11,550 new homes by 2041. While we support this ambition, there is a need to make sure that new developments complement existing communities, provide the housing that is most needed in the borough, and not have a detrimental impact on the environment.
- To this effect, Camden Green Party believes that all new developments should:
 - Have a strategic target of 50% affordable housing. This is in line with the London Plan, but it is a significant increase compared with Camden's current target which is only 35% affordable housing. Regrettably, even at the current, lower level many developments that are approved by the Planning Committee fall well short of target.
 - Provide affordable housing on-site, rather than off-site, so that new developments have mixed tenure from the outset, enabling communities to be better integrated and socially cohesive.
 - Meet PassivHaus (a voluntary standard for ultra-low energy buildings that require little energy for space heating or cooling) standards for quality, comfort and energy efficiency. The Plan says that new buildings must be "designed and built to be net zero carbon in operation", however developers are given flexibility to get around this by making a payment in lieu. This must be strengthened and environmental considerations must be given a high priority in planning decisions.
- We believe that, at present, developers are given too much flexibility to vary the proportion of market and affordable housing, or to vary the split between low-cost rented and intermediate rented affordable homes. Increasing the amount of social housing must always be the priority.
- We also want to ensure that new homes are the right size for the families that need them most on the social housing waiting list. We want to see strict policies in place to ensure that no new homes are ever left vacant.
- We support Camden's ambition to bring empty homes back into use, however we also believe that council tax penalties are too low. We would like to see properties that have been empty for one year charged at 100% premium, for

two years charged at 200%, for three years charged at 300%, increasing sequentially each year that they are empty.

- Similarly, while we support the increase in council tax on second homes, we question whether this is sufficiently high to have the desired impact.
- More detail is needed from Camden about its goal to “resist conversion of permanent residential to short-stay of less than 90 days” and to resist “the development of housing for short term lets, unless it can be demonstrated to the Council’s satisfaction that the site is unsuitable for the provision of permanent self-contained housing”. We would like the Plan to reveal the current extent of the problem and how it can be reduced, rather than simply attempting to stop it increasing further.

Solar panels and air source heat pumps

- We welcome the Plan’s comments in respect to the installation of solar panels that require planning permission and listed building consent. More flexibility is required to enable residents to install solar panels in conservation areas, prioritising the public benefit of tackling the climate emergency.
- We support Camden’s approach to air source heat pumps, agreeing that where these are proposed it should be recommended that works to improve the energy efficiency of the building, such as additional insulation and draught proofing, are incorporated alongside the installation of these devices.

Specific developments

- **Murphy’s Yard:** Camden’s Green Party councillors, Sian Berry and Lorna Jane Russell, both wrote objections to the Murphy’s Yard planning consultation in 2022, focused on the size and scale of the developments, the lack of affordable housing, and the environmental impact of the scheme.
- **Regis Road:** We are concerned that the Camden Building Height Study has identified this site as a location where tall buildings may be an appropriate form of development, with 12m - 52m considered the potentially appropriate height range. We are concerned about the impact that tower blocks this high would have on the Kentish Town community.
- **Mansfield Bowling Club:** We note that the Plan’s reference to potential developments on the former bowling club site refer to previous planning applications for 23 homes, rather than the current intention of the developer to build a luxury 80-bed care home on the site.
 - We strongly oppose the development of such a building on this site, as the plans as they currently stand are too large and dominant for the space.
 - We support the intention to ensure that any new development makes provision for a new public open space, enhanced tennis facilities, and an ancillary sports pavilion on-site, and believe that all amenities should be open for public use.

- We also believe it is vital to ensure that nature and biodiversity on the site is protected.

Other comments

- We support the Plan's calls for public toilets "where interchanges cater for longer distance journeys".
- We welcome Camden's commitment to "working with car club operators to expand and improve the network of car club bays in the borough".
- We welcome Camden's commitment to resisting development that occupies an excessive part of the garden, and the loss of garden space which contributes to the character of the townscape.
- We welcome the planting of 800 new trees in the borough, though do not believe that this target is ambitious. We believe it should be raised to 2,000 new trees. We believe it is vital to ensure that the target for new trees is net, rather than including those which have been planted to replace ones that have been removed.
- We agree that both Kentish Town and Camden Town stations need step-free access – and will work with Green Assembly Members to make this case to TfL.
- We believe that the Plan should include a general principle of avoiding impermeable surfaces at all costs to allow rain water and draining, and reduce flooding. We strongly believe in greater use of SUDS - sustainable drainage systems, which are systems that are considered to be environmentally beneficial, causing minimal or no long-term detrimental damage
- We are disappointed that town centres are not discussed in sufficient detail in the Plan, and neither is a possible easing of rates for small independent businesses. Many small businesses and retailers are suffering greatly and this is impacting many high streets in the borough with knock on effects on safety and littering.