## Consultation response to Kentish Town Planning Framework 2019

**Overview**

Climate Emergency Camden (Built Environment Group) welcomes Camden Council's decision to 'ensure a strategic and coordinated approach' to the development of the Murphy/Regis Road site. However, as currently set out, the Kentish Town Planning Framework contains too much ambiguity and we wish it to go further in being an exemplar of how the Council is meeting the climate and ecological emergency. We set out below our suggestions for improving the Framework.

## 1. Zero emissions

Throughout the Planning Framework, there are references to the ambition that this is a zero emissions development. Specifically, to 'prohibit the use of combustion-based fuels (natural gas, petrol, diesel for heating and transport'. The framework refers to the requirement for new businesses to join the Camden Climate Change Alliance (CCCA) 'to help support the ambitions for a zero emissions neighbourhood.' That could imply zero emissions will not be mandated from the start but will be 'work in progress'.

To be clear, a zero-emissions neighbourhood entirely eliminating the burning of fossil fuels is welcome and essential, and extends the development beyond the existing Building Regulations that still allow gas boilers, wood burning stoves and CHP.

However, the document reads as if the 'zero emissions neighbourhood' is a combustion free neighbourhood only, rather than also a zero-carbon development. There needs to be much more clarity on the zero-carbon aspiration of the development. There is one sentence in the document that refers to requiring 'all buildings to comply with zero carbon standards'. What exactly does this mean?

In light of the development spanning the next few decades, it is essential the framework covers more than just the regulated loads covered by current Building Regulations but also sets targets for full operational energy use and embodied carbon. The next point covers our recommendations for a Net Zero target.

## 2. Zero Carbon

Due to the length of time the construction is likely to take, it is essential to embed a commitment to **Net Zero** in the framework now. This needs to be set out alongside the commitment to zero emissions to avoid any ambiguity in the future.

We would recommend mandating the following:

- **Net Zero carbon in construction** for all new build and major refurbishments and **Net Zero for operational energy** when the building is in use.

  For a clear definition of Net Zero, refer to the 10 requirements by LETI in their 1-pager (https://www.leti.london/one-pager) supported by the UKGBC, the RIBA and CIBSE among others.

- **Net Zero carbon for operational energy** for existing buildings. See LETI definition above.

- For **embodied carbon**, unfortunately there is not yet a clear definition of Net Zero but there should be, as a minimum, the requirement to estimate and reduce embodied carbon in line with best practice. When Net Zero embodied carbon is established as a coherent target, this should be mandated across the development.

## 3. Density.

The Planning Framework identifies the ambition to reprovide existing uses, intensify employment use and build an additional 2000 new homes. For an existing Kentish Town ward population of 13,417 living in 5793 households (2011 census), the addition of an additional 2000 homes represents a staggering 33% increase, more than the entire King's Cross development. Further massing studies will be required but it seems highly unlikely this number will be accommodated without building above 8 stories. Indeed, the framework quotes,

'Taller buildings (ie. more than 8 storeys) will be considered where they help to support additional homes'

The acceptability of this density is identified as being subject to detailed townscape analysis, view analysis etc. but this ignores the fact that the proposed density is likely to be at odds with a Net Zero requirement. The area required for renewables could not be accommodated. We believe further work is needed to link the proposed density, the massing and energy strategy before this framework is approved with the current number and heights stipulated.

## 3. Water use and drainage.

The Planning Framework refers to the use of sustainable drainage. This is of course welcome. But, with the area available, it would be possible to be so much more ambitious and to consider, at a masterplan scale, how overall water use is dramatically reduced. Planning the conservation and reuse of water at a masterplan level would allow the coordination of rainwater collection and reuse, grey water recycling, possibly even black water recycling with storm water attenuation to provide a truly sustainable water system. This could be mandated as a target number of litres per day for each resident or the provision and sign off of a water use and drainage strategy.

## 4. Biodiversity

The document refers to existing 'rich biodiversity that includes areas of Heath, railway corridors and nearby nature areas'. It is not clear whether there are areas that need to be retained. If so, this should be identified. It would be helpful to ensure the aspirations are met to set out more specifically the level of biodiversity net gain required across the masterplan. Rather than suggesting buildings have a role to play (rooftops and walls) in providing habitats, it should be possible to ensure each building does include, for example, bee hotels, swift boxes, bat boxes as part of the design. An overarching ecology overlay to the masterplan would identify the habitats that should be provided and ensure that wildlife corridors, light levels, building materials etc. all support this.

## 5. Construction waste

We also recommend including an onerous requirement in relation to construction waste which could help promote offsite construction and reduce the impact on surrounding properties and businesses of this enormous development. It may also be worth considering whether the role of 'recycling centre' could be extended to include construction waste to help embed the move to a circular economy within the development.