REGIS ROAD AREA GUIDANCE
06.01.25

Following are Climate Emergency Camden's comments on the proposed revision to the Kentish Town Planning Framework, published on Commonplace as an addendum entitled 'Regis Road Area Guidance'.

The framing of the addendum is correct when it says that things have changed since the framework was published in 2020. Since then, the scale of the threat resulting from climate change and ecological breakdown to humanity has become even clearer, as set out by the UN, the IPCC and many scientific bodies. In May 2024, this danger was summarised by Sir David King, the Government's Chief Scientific Advisor from 2000 to 2007:

> On our current path, civilisation as we know it will disappear. If we meet current commitments only – net zero by 2050 – perhaps some form of humanity will survive, managing the challenges of continued extreme weather events, ice loss, and sea-level and temperature rises.

As shown in the draft addendum, however, Camden Council continues to ignore the existential threat resulting from business-as-usual development models. Instead, councillors and officers are putting their collective heads in the sand and doubling down on development that results in forms of construction harmful to our prospects for a liveable planet.

The supply of more high-rise, high-carbon development is a trend that is playing out across Camden, following the 'growth' mantra espoused by the government. It is particularly surprising that young planners in Camden Council's planning department have not recognised this approach for what it is: incompatible with the UK's legally binding carbon budgets. If the UK is to deliver on its net zero imperative, sustainable construction practices are required immediately.

UP-FRONT CARBON EMISSIONS CAUSED BY CONSTRUCTION
The addendum makes no mention of the need to reduce carbon emissions resulting from construction ('up-front carbon'), nor of the need to build in ways that are truly sustainable. These are shocking omissions. The guidance should specify limits on the carbon intensity of the construction of newly built floor space (kgCO2e/m2) and limits on the total amount of new floor space, as compatible with the UK's carbon budgets. The addendum is an opportunity to strengthen requirements of the National Planning Policy Framework's objective to mitigate climate change.

New construction should be limited to what can be built with low-carbon building technologies. Large concrete basements and super-structures result in the most carbon emissions and should not be permitted.

Prioritisation of 'whole-life carbon' over the 'up-front carbon' of the initial construction is a common way of putting off action that should be taken now. Whole-life carbon assessments

rely on the low energy use of the building in operation over a 60-year period to make up for the high carbon cost of the initial construction. We do not have 60 years to delay action in this way. Limits need to be set to reduce the initial spike in emissions now, at this critical time. If we continue to take this limited approach of 'measuring' carbon emissions and continuing with business-as-usual construction, we will be contributing to a 3ºC global temperature rise by the end of the century, if not before, with catastrophic results for billions of people.

LOW-CARBON MASTER PLAN

The addendum includes a draft master plan designed to accommodate the requirements of Camden Council's development partner Yoo Capital. It is not in the best interests of Camden's citizens. The revision of the Kentish Town Planning Framework is an opportunity to create an environmentally responsible approach to the development of the site. This should be predicated on:

- retaining existing buildings where they can be repurposed;
- using low-carbon building technologies for new buildings; and
- providing green space and trees to provide environmental benefits.

HOLMES ROAD DEPOT

The proposed demolition of the Holmes Road Depot is unacceptable in terms of climate impact. Climate Emergency Camden submitted a deputation on this subject to the Environment and Culture Scrutiny Committee meetings of 30 March 2023 (attached).

The Council claims that the proposal to demolish and re-provide the depot is acceptable because the demolition materials will be recycled. The proposal fails to consider the high levels of carbon emissions resulting from the crushing of concrete and other forms of material processing, as well as the emissions resulting from building a replacement depot. It is evidence of the Council's illiteracy when it comes to the need to mitigate climate breakdown.

RESILIENCE TO THE CONSEQUENCES OF CLIMATE BREAKDOWN

The stated 'Vision for Regis Road' does not include an approach to urban design that will help us mitigate and adapt to climate systems collapse and associated economic risks. Rather, it would result in chronic over-development of the site, with large blocks too close together, not unlike the King's Cross development. This is a failure on the part of the guidance. To be appropriate and effective, the guidance should embody a vision for the future that is based on fact and that respects planetary boundaries.

Extreme heat and increased rainfall are likely to impact residents of Camden less than the social breakdown that will occur because of economic stresses, including food scarcity. Ensuring resilience therefore requires an innovative approach to neighbourhood development, one designed in collaboration with people living in and around Kentish Town, who can help to determine how best to meet local needs and provide a resilient urban environment for the future.

REDUCTION OF WASTE

The opportunity that comes from relocating the recycling centre should be developed as part of the addendum. It is unreasonable for the entire borough to have only one recycling centre and counterproductive that people must drive to transport their recyclable material to Regis Road. There should be a borough-wide plan for integrated recycling, reuse and repair within neighbourhoods, as we transition to the zero-waste approach that is required to reduce the environmental damage caused by global extraction and waste disposal.