

CULTURE AND ENVIRONMENT SCRUTINY COMMITTEE

MONDAY, 3 APRIL 2023 AT 6.00 PM
COMMITTEE ROOM 2, CROWDALE CENTRE, 218 EVERS HOLT STREET,
LONDON, NW1 1BD

Enquiries to: Sola Odusina, Committee Services
E-Mail: sola.odusina@camden.gov.uk
Telephone: 0207 974 6884 (Text phone prefix 18001)
Fax No: 020 7974 5921

SUPPLEMENTARY AGENDA

5. DEPUTATIONS

The Chair has agreed to accept 2 deputations in relation to item 7 Call-In- Implementation of the Regeneration Strategy for the Kentish Town Regis Road Growth Area (SC/2023/15) from:

Alice Brown – Climate Emergency Camden; and (Pages 3 - 6)

Tom Young – Tom Young Architects (Pages 7 - 10)

SUPPLEMENTARY AGENDA ENDS

Issued on: Friday 31 March 2023

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Agenda Item 5

From: [REDACTED]
To: [Sola Odusina](#)
Cc: [REDACTED]
Subject: Deputation to C&E Scrutiny Committee on 03.04.23
Date: 30 March 2023 09:41:20
Attachments: [Holmes Road Depot deputation 30.03.23.pdf](#)

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Dear Sola Odusina

We would be grateful for an opportunity to make a deputation to the Committee regarding the sale of the Holmes Road depot. The person attending the meeting via Teams would be Alice Brown, who can be contacted on the email address above.

Please find attached our deputation statement. We would be grateful if it could be distributed to committee members beforehand.

Thank you.

Yours sincerely

Climate Emergency Camden

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Climate Emergency Camden's Deputation to the C&E Scrutiny Committee on Holmes Road, 30.03.23

Climate Emergency Camden has made deputations to this committee before, asking for better scrutiny of decisions made by Camden Council in the light of the Climate and Ecological Emergency. Unfortunately the proposed decision to dispose of the Holmes Road Depot will be very harmful and shows a complete lack of understanding of the threats and lack of oversight. The IPCC 6th report published last week made it very clear that 'business as usual' has to stop. With this decision however, Camden Council is doubling down on 'business as usual', INCREASING rather than decreasing the harm.

New buildings have been portrayed as a symbol of progress and a thriving economy, but the reality is often the opposite. The built environment consumes around 40 per cent of the world's extracted materials; in many countries waste from demolition and construction represents the largest single waste stream. Together, building and construction generate 39 per cent of the world's carbon emissions, with 11 per cent from emissions embodied in the materials and construction processes and the remaining 28 per cent from operational emissions (energy used to heat, cool and light the buildings).

The perception is that building new will radically reduce carbon emissions in operation compared to an existing building. However, even when operational emissions are reduced those savings will only be achieved in the future: constructing a new building means paying a heavy upfront toll from the extraction of raw materials, transport and construction. And we have to radically reduce GHG emissions **within 10 years**.

2 years ago Holmes Road depot had £8.4m invested to refurbish the building and reduce operational carbon emissions by 50%. This was achieved by insulating the building and installing low energy heating (heat pumps) and PV panels. According to the *Energy Strategy & Low Zero Carbon (LZC) Feasibility Report*, produced by Pi Consult for Camden Council in 2018, those works would:

- exceed the council's energy targets
- result in cumulative 51.85% reduction on the baseline emissions
- save 110 tonnes CO₂e per year (2,200 tonnes CO₂e over 20 years).

These savings in operational carbon over the next 20 years would justify the embodied carbon of the refurbishment works, estimated to have been around 1,000 tonnes CO₂e (200kgCO₂e x approx. 5,000m²).

However, if the building is demolished as planned, not only will these emissions be entirely wasted, but also the facilities will need to be rebuilt as part of the redevelopment, adding something like 5,000 tonnes CO₂e (200kgCO₂e x approx. 5,000m²).

Nowhere in the reporting on the proposed sale of the depot have the implications of these extra emissions been mentioned. Demolishing and rebuilding the depot will generate a further huge amount of unnecessary emissions within the next critical 10 year period. The harm caused will be further increased by the proposed redevelopment of the whole Regis Road site, which will be likely to further contribute to the crisis with the type of high carbon construction we see proposed at the O2 Centre.

The sell-off of the depot, together with the car pound and the reuse and recycling centre, aims to 'kickstart' the regeneration strategy for the Regis Road industrial area. Camden's plans for Regis Road and the nearby Murphy site are set out in the Kentish Town Framework, but this was developed before the Council declared a Climate and Ecological Emergency and will not result in the transformation needed to address these existential threats as it continues to promote high-carbon development. The Framework also predates and is out of step with the London Plan 2021, which emphasises 'Good Growth – growth that is socially and economically inclusive and environmentally sustainable.' Similarly, it contradicts many of the requirements in new and proposed national planning laws, which include increased requirements for climate change amelioration, environmental protection and community engagement. Camden should as a matter of urgency revise the Kentish Town Framework and not proceed with the impractical, socially and environmentally destructive targets set out in the current version.

At Regis Road there is an opportunity for a development built around the requirement to promote the circular economy. This could develop the existing facilities at Holmes Road depot, connect them to the recycling centre and integrate them with Kentish Town Road and Queen's Crescent, with an expansion of initiatives such as the Fixing Factory, and Library of Things. The recycling itself needs to be extended throughout the borough. At present most people must drive some way to access the single facility at Regis Road, largely defeating the point of recycling.

There is no need to demolish this building or sell it to a developer. The very recent retrofit works have made it fit for purpose, meeting the Council's needs. Demolition would be climate vandalism', flying in the face of all national and local guidelines.

Camden cannot continue to promote short term financial gain over huge long-term costs to us all. We call on the Committee to take the only responsible decision and halt the proposed sale.

From: [REDACTED]
To: [Sola Odusina](#)
Cc: [Linda Chung \(Cllr\)](#)
Subject: Deputation Text
Date: 30 March 2023 06:43:11
Attachments: [Deputation-Text-Tom-Young-April23.docx](#)

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To whom it may concern

Please find attached our deputation text for the sitting of the Environment Scrutiny committee on 3rd April

Please confirm receipt.

kind regards

Tom Young
tom young architects

[REDACTED]

[REDACTED]

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28 Mar 2023

Culture and Environment Scrutiny Committee Mon 3 April at 6 pm.

Deputation from Tom Young

We - the public - are asked to accept on trust that the sale of the two NW5 depots to a single “visionary” developer (possibly British Land) is consistent with KT Planning Framework. It’s stated as such several times in Cllr Beales’s November report to Cabinet.

We know the costly retrofit of the Holmes Rd depot has gone ahead while Cllr Beales has been the cabinet member for regeneration and after the formal adoption of the KT Framework in 2020. The Framework area includes the depot.

The Framework demands

“Proposals should demonstrate innovative and flexible approaches to building design, enabling future adaptability with the very highest sustainability credentials”

The depot’s demolition would be a terrible beginning to the process of realising the goal of sustainable development through the KT Framework.

Negotiations between Beales and the so-called visionary developer poised to buy the Holmes Rd and Regis Rd depots might be expected to rule out demolition if sustainability was a genuine concern. But, Beales hasn’t given any assurances on this score.

Cllr Beales’s advocacy of comprehensive development at Regis Rd, borrowed from the Framework document, imposes hefty costs on a developer. Para 2.4 of last November’s cabinet report lays out the challenge

“Regeneration could be achieved potentially through a conditional land sale agreement, where the Council’s land is disposed of to a private sector developer to take on the planning and development risks. Sitting alongside disposal, the Council could also agree to use its land powers – compulsory purchase and land appropriation, and potentially acquisitions by agreement if necessary – with costs covered by the developer to enable a comprehensive approach to be delivered in the longer term”

This is an extraordinary strategy and all of it flows from the initial sale of the Holmes Rd and Regis Rd depots. The developer is apparently expected to bring forward a single planning application for the whole Regis Rd area (plus the Holmes Rd depot) after covering all Camden’s compulsory purchase and land appropriation costs. Wow! What sort of bargaining position does that give the developer?

The idea that Camden can reach a mutually advantageous agreement with a developer obliged to do all this heavy-lifting which also protects the public interest invites scepticism. I hope you are sceptical. The KT Framework document is absolutely no assurance in this regard, and it’s vital you recognise that.

Beales wants us to believe its narrative of neighbourhood improvement will survive contact with reality - which in this case is a deal with a developer who is expected to fund the buy out of all the other 9 or so existing property owners, a vastly expensive undertaking already aggravated by hope-value caused by the Framework itself. The same developer is expected to liaise with all the landowners and prepare a masterplan and submit a single planning application. Obviously, the planning process will be hopelessly compromised by the demands and requirements of the developer or as Beales himself said in an interview with a property magazine a couple of years ago: "communities will be pragmatic about trade-offs, as long as they are involved". I don't trust this notion of pragmatism at all. Far more of this has to be in the open.

We see in the inevitable demolition of the Holmes Rd depot that sustainability is already a casualty of Camden's deal-making. I ask you to recognise that the KT Framework does not protect the public interest.

It is vital, in light of that realisation, that Camden now changes tack. It must lead a new process at Regis Rd by drafting its own plan for the urbanisation of the site - its own masterplan. It must be a hard-edged urban plan, fully-quantified and evidence-based, and used as the firm basis for any deal. Only Camden can protect the public interest in the situation we now face. Camden has to take responsibility by driving matters forward itself.