BACTON TOWERS ACTION

To Camden Council Complaints

29th April 2025

Dear Complaints Department,

We are writing to lodge a formal complaint about the process for rebuilding of the low-rise part of Bacton Estate in Gospel Oak, from the point in September 2022 when the Council made the decision to enter into a private agreement with a developer to deliver the scheme.

We make our complaint on three counts:

1) Failure to properly consider the impacts on the community, including new residents of the homes in the Mount Anvil scheme

The impacts of the scheme are wide and various. They include over-development with overbearing buildings, completely at odds with the character of the area, loss of daylight, strain on infrastructure and services and high embodied carbon emissions, among many others. Respondents to the planning application for a Scoping Opinion on the EIA (planning ref. 2024/5383/P) captured these in more detail, particularly the response submitted by Queen's Crescent Neighbourhood Forum (emerging). Camden Council is promoting this scheme in the knowledge of the harms that will result from it.

2) <u>Failure to involve residents and businesses in the selection of the developer or</u> the development concept (the three towers)

When Camden Council first decided to proceed with the redevelopment of the low-rise part of Bacton Estate, it embarked on a comprehensive co-design process, which culminated in the low-and-mid-rise scheme that received planning permission in 2012. This was then enshrined within the Gospel Oak and Haverstock Community Vision, a planning framework developed in partnership with local people.

In 2022, officers advised Cabinet members to accept their recommendation to abandon direct delivery of Bacton Phase 2 ('Council as Developer'), on the grounds that they were finding it difficult to obtain sufficient funding from Homes England. It is clear at this point that the Council did not anticipate any significant divergence from the permitted scheme, and that the developer would be able to 'amend' the existing planning permission.

We do not know at what point the Council learned that the developer version would be **fundamentally different** from the permitted scheme. This was not made public. Sometime later, Camden Council selected Mount Anvil behind closed doors. The development partner selection process involved a lot of dialogue between Camden officers and developers but there was no community involvement at all.

The public first got sight of the three-tower high-rise scheme in October 2024, two years after the Cabinet voted for a Developer Agreement and a year after Mount Anvil was chosen as the development partner.

Camden's conduct contradicts its formal commitments to develop schemes with the community – see We are Camden, Camden Council's Constitution, the Haverstock and Gospel Oak Vision and multiple CIP reports.

3) Lack of credibility in the claim to be addressing the housing crisis

We object to publicity in which Camden council claims it is "tackling the housing crisis" at Bacton, as well as the framing of those who object to the Bacton high-rise scheme as indifferent to housing need. We believe that Camden's housing programme – the Community Investment Programme (CIP) doesn't have a coherent plan to stop the housing crisis in the borough for the following reasons:

- 1. CIP does not produce a lot of additional council homes and does not track the growth of the housing waiting list. CIP can mitigate just a small percentage of rising housing need. Right now, there is a net increase of about 20 council homes in our neighbourhood due to the CIP a poor return for the last 15 years. If the 2012, midrise Bacton scheme had been completed by around 2020, the total would be about 80. The scheme proposed by Mount Anvil would take the total number of council homes to about 120 by 2030. The implied rate will still be less than what building the 2012 mid-rise scheme in a timely way would have achieved. In other words, CIP is a landlord's accommodation strategy, not a programme dedicated to increasing the number of council homes.
- 2. CIP relies on cross-subsidising affordable housing by selling private housing. Depending on the design, the private housing units take up public housing land. In the case of Bacton, about 30% of the site area will be lost to the towers consisting exclusively of private homes for sale. That land is lost in perpetuity, generating a strategic opportunity cost for any long-term plan to address the housing crisis and the core need for affordable urban housing. The reliance on selling flats to pay for affordable housing means there's a risk that a "high volume of sales units could depress values locally if not managed correctly" (excerpt from Cabinet papers about the redevelopment of the West Kentish Town Estate). This shows that cross-subsidy incentivises CIP officials to keep prices high for buyers, which means many potential local buyers will be priced out.
- 3. CIP is unfolding without a clear plan for our neighbourhood. CIP is being taken forward on a site-by-site basis with no coherent approach across the area. The schemes for Bacton, Wendling and West Kentish Town Estate are all threats to the neighbourhood's integrity. By comparison, the developments at Maitland Park Estate, Kiln Place and Cherry Court (Bacton Phase 1) are mid-rise products of the same housing programme, for which the same officers are now commissioning high-rise schemes like the one proposed by Mount Anvil. Housing intensification does matter but in most built CIP schemes to date (except for a tower in Kilburn and one in Agar Grove), this has been done without resort to high-rise, let alone three towers in one small site.

Summary

We therefore believe that Camden Council is **not** working in the public interest but has allowed itself to go down a route that will harm the long-term interests of the local area. This is a failure of the Council to follow its Constitution and to deliver benefits for local people.

It is on these grounds that we ask the Council to:

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- Acknowledge the harms that would result from the developer scheme and work hard to reduce them
- Involve the community in any decision making that alters the previous planning permitted scheme
- Ensure a better outcome in terms of housing affordability and tenure from this scheme

Yours sincerely,

Robert Lewenstein

on behalf of Bacton Towers Action