BTA response to sections of the Draft London Plan

We are writing on behalf of Bacton Towers Action (BTA), a group of over 200 residents in Haverstock and Gospel Oak (London Borough of Camden) of different tenures. There are several estates in our ward that were built in the 1970, such as Weedington Estate (formerly known as Gospel Oak 7&8), Wendling, Waxham or West Kentish Town Estate.

The majority of residents living on these estates are council tenants. Bacton Low-Rise Estate was demolished in 2018. It comprised nearly 100 council homes. The site has been empty and boarded off since. A private for-profit developer, Mount Anvil, has proposed to build three high-rise towers of up to 20 storeys on the site, including less than 30% social housing squeezed at the bottom between the towers.

Chapter 2: Making best use of land and achieving Good Growth

MBUL2: Optimising the use of land and site capacity

Key argument
Specifications regarding density and height miss important local factors, which will likely harm communities.

Explanation
The Optimisation Framework considers densification as a favourable approach to increasing housing stock without proper consideration of local contexts. Simply categorising sites across London into different typologies, which then correspond to set minimum density ranges and heights, misses important factors such as heritage, protected views, capacity of existing infrastructure, environmental impacts, social fragmentation, local deprivation and community need.

Impact
The impact of higher density without proper consideration of context and provision for added services includes:

- Heritage buildings being overshadowed or damaged in the process (as would be the case for St Martin's Church next to the Bacton Low-Rise Estate site)
- Protected views being disturbed (as would be the case from Parliament Hill to St Paul's Church in our case)
- Strain on existing infrastructure (such as parking, public transport, GP surgeries and dental practices in our case)
- Considerable carbon emissions, air and noise pollution in the midst of a climate crisis (including the loss of mature trees in our case)
- Wind tunnels (as already experienced by residents around the existing Bacton Tower)
- Loss of vital daylight (including on surrounding heritage buildings and a care home next to the Bacton site)
- Social fragmentation through the segregation of social tenants, private renters and leaseholders

- Increased risks to residents suffering from ill mental health (there have been at least two suicides by jumping from the existing Bacton Tower, one as recent as May 2026, which shook our already deprived community)

Test of soundness
This policy fails the test of soundness in our view because it does not consider the key needs of the area. Residents have told us over and over again that what they need at Bacton is family-sized social housing in low-rise buildings. Most do not wish to live in tower blocks, which they view as unsafe (particularly after Grenfell), unsuitable for community cohesion and expensive to build and maintain. Residents see very little benefit in Mount Anvil's current proposal to them.

Evidence
Our experience in talking with residents for the past two years shows a clear preference for council-led, low-rise developments that are consistent with the character of the neighbourhood. Residents oppose the idea of public land being sold to a private company for a for-profit development that will not benefit them for the most part. They are not opposed to new housing being built, but it has to be *proportionate, appropriate and responsive* to the local context.

Improvements
In our view, the draft could be improved by not stipulating minimum density ranges and heights for each typology. Instead, the draft could stipulate guiding principles, such as for any development proposals to be co-designed with residents and respond to key concerns from the residents who will be most impacted.

Examination in Public
We wish to be invited to the Examination in Public to participate in the discussion, share our experiences and respond to other participants.

Section 2.1 This should be added: "Priority must be given to protecting existing communities and for developments to respond to their needs".

Section 2.3 This should be added: "The plan does not endorse the demolition of residential housing on public land (Council Estates for example) to make way for private lead developments."

Section 2.6 This should be added: "The plan encourages new developments to meet the needs of London residents and not as vehicles for investment opportunities. Housing needs to be truly affordable for Londoners who are priced out of the market."

Section 2.15 The Plan needs to recognise the tradition, history and complex cultural strands that form the bed rock of communities. These need to be protected in the London Plan.

Section 2.17 For the Plan to work, it needs to ensure that revenue (CIP) given to councils is 100% spent specifically in the development area and not council wide, and ensures that local and new residents have the services and infrastructure that is required to

accommodate new residents. Existing residents should not see any decline in facilities, services and infrastructure despite increased population density in their area.

Section 2.18 The rationale of good growth has to reflect what London residents need or else we will see greater inequality in our city and lose a once in a generation chance to build a more inclusive city that meets the needs of families, young adults, the old and those in poverty.

Section 2.45, MBUL3 The draft plan needs to recognise the failings of planning in London with numerous examples of tall building developments gaining or seeking planning permission in areas totally unsuited to the existing scale.

Tall buildings will not solve the London housing crisis, by their nature these are not suitable for families and typically offer 1 and 2 bedroom units that are too expensive for the majority of Londoners, and expose them to a lifetime of renting.

Tall buildings have many downsides and the plan needs to acknowledge this to offset the current tendency of developers to over exploit sites. The downsides that will affect residents needs are as follows: safety concerns, repair costs, not suitable for families, cost of purchases excluding many, lack of outdoor space, over supply of one and two bedroom property, loss of light, wind tunnel effect around the towers, blocking of protected views, impacting local heritage and green spaces, and a negative impact on fostering a sense of belonging to a community and place.

Chapter 3: Delivering the homes and neighbourhoods Londoners need

Section 3.3 The plan needs to recognise the current predominantly private lead housing development model is failing to deliver these diverse housing needs.

Section 3.4 We would endorse this but wish to point out that affordable housing at 80% of market value is still out of reach for most and that social rent needs to be set at a rate that key workers can afford. The plan needs to facilitate, by laying the ground work and funding model, to allow for council housing to be built and as this will achieve these goals diverse tenure and real affordability where private lead developments are not able to.

Section 3.5 We need to be building Council homes to provide housing despite market pressures this has led to a slow down of private lead developments due too, building costs, affordability, over saturation of the market of small flats and reticence of buyers to buy lease hold flats were service charges and maintenance ie. major works can be exorbitant and unpredictable.

Section 3.6 The plan should add, “Vacant properties are a major problem, councils need to ensure that their vacated properties are turned around quickly and legislation needs to be put in place to ensure private property that's left vacated is brought back into the housing stock“.

Section 3.8 We need to clarify what “genuinely affordable” means, how much below market values and does it mean better value than just “affordable”, because of high market values in London so called “affordable” in reality is not for a large part of the population who are priced out. The policy should meet the real needs and offer genuine possibility for Londoners to secure a viable and sustainable future in their city. Without the cost of housing being affordable to those on low income we can not address all the needs for housing.

Section 3.28 This is highly concerning: “Viability testing will not be required, and the scheme will be able to follow the fast-track route”. The draft needs to explain what this means in reality, can any scheme be built regardless of viability and impacts if it meets this criteria?

We need truly affordable, as we have already stated “affordable” is still pricing many out of the opportunity for either buying, shared ownership or Affordable Rent. This part of the Plan is a private developers charter to build at the expense of residents.

Estate regeneration on public land should provide council housing or housing through housing associations on a similar basis, the Draft Plan should be clear that public assets should remain in the public realm for providing quality housing that meets London’s needs and not be handed over to private developers, we are danger of losing vital resources and opportunities in the future for little gain and in the process risk breaking down the bonds that hold these communities together.

Section 3.36 The “Fast track route” needs to be removed from the plan. We should ensure that all re-developments on estates are built to the highest possible standard and serve the needs of existing and new residents.

Estate regeneration has enormous potential impacts on residents during and after the build and the draft plan needs to ensure the best use of the public land which fast tracking will not deliver. The draft plan needs to recognise that private-led development in London has stalled not because of the planning process but because of an over-saturated market (too many of the same type of new builds, such as 1 and 2 bedrooms) that has led to a fall in sales. Fast tracking planning will not solve the problem and only lead to poor planning across London.