



TOWARDS A NEW LONDON PLAN

Comments by Climate Emergency Camden's Built Environment Group

22nd June 2025

Climate Emergency Camden (CEC) is a non-party-political coalition of local groups and residents in Camden which aims to inspire bold, transformative borough-wide action in response to growing evidence about the threat to people and planet from catastrophic climate and ecological breakdown. CEC was established in April 2019.

1 SUMMARY

We believe that the prioritisation of 'growth' for its own sake, without a sound basis of need, will result in ecological harms that are incompatible with future human ability to thrive, or even survive, on this planet.

In reviewing the "Towards a New London Plan" document, we are concerned by:

- the prioritisation of 'growth' for its own sake
- its lack of a strategy based on evidence
- lack of hard targets for restraining harmful outcomes and operating within planetary boundaries for sustainable development.

2 THE CLIMATE AND ECOLOGICAL EMERGENCY

The environmental catastrophe that we are facing is the result of unconstrained growth, causing carbon emissions, resource exploitation and lack of protection of our ecosystems. This is well documented and understood. Most national governments assume that the climate crisis will be addressed through technological innovation, without understanding that this will result in more exploitation and destruction of ecosystems on which we depend.

There is little firm grasp of the need to minimise our 'ecological footprint', and shepherd resources to minimise environmental harms. In the case of the development in London these harms are the result of construction of physical infrastructure and new buildings.

We need to limit new construction to what is necessary for human well-being and seek imaginative ways of using and re-using existing resources, ie. existing buildings and infrastructure.

The ways in which these issues are addressed in “Towards a New London Plan” do not significantly alter business-as-usual development models.

3 NEW LONDON PLAN

3.1 Housing

In relation to policy areas, we would add to the comments of others, eg. Just Space, in calling for a sound evidence basis for new housing delivery.

There is not a clear measurement of actual housing need, which is for additional social rent homes. We do not need the vast numbers of private homes that are being built in the capital. These are mostly built for generation of profit for pension funds and private companies, and many lie empty. This is a waste of resources and causes a high amount of unnecessary carbon emissions.

Good quality homes should be provided to meet housing need primarily through bringing unused buildings into use, including retrofit of vacant homes. Measures should be taken to reduce the letting of homes through Airbnb for commercial profit and second homes should be discouraged.

3.2 Commercial

We see demolition and rebuild of office space continuing on a business-as-usual basis. There is no real constraint on the demolition of existing buildings to enable their owners to redevelop for profit. Developers’ consultants run rings round planning officers when it comes to reviewing required appraisals for retention options, which inevitably lead to complete demolition or façade retention being justified.

The following four applications, for schemes approved by London Borough of Camden, show where current policy has been shown as inadequate to protect existing commercial and cultural buildings from demolition:

Most of sub-structure and super structure demolished:
2022/2510/P, Selkirk House

Only part of the lift shaft and the foundations retained:
2023/5240/P, Euston Tower

Façade retention scheme:
2024/0993/P and 2024/1005/L, 135 -149 Shaftesbury Avenue

Facade retention scheme with some internal structure retained:
2022/1817/P (2025/1684/P), 105 Judd Street

Climate Emergency Camden's previous submissions to LB Camden planning committee regarding these applications are attached as an appendix.

When these schemes are presented by planning officers to the committee, the quantity of up-front carbon emissions are rarely mentioned or assessed in terms of the damage to the ecosphere.

3.3 Mitigating climate change

Whole Life Carbon policies are intended to reduce the amount of Greenhouse Gas (carbon) emissions being emitted. This is an urgent matter, as to avert catastrophic climate breakdown we need to radically reduce emissions within the next 10 years. This means that we should be prioritising the reduction of up-front emissions caused by the construction of a building (Modules A1-5). There need to be fixed targets for the carbon intensity of new construction (Modules 1-5), to make a change to 'business as usual' construction. This should aim to change the nature of construction and vastly increase the likelihood that existing buildings will be retained, converted and re-used, in a way that minimises carbon emissions.

3.4 Circular Economy

Circular Economy policies are intended to reduce the amount of material extraction occurring around the world, and the impact of the pollution that results from waste materials on ecosystems. Extraction and emissions are linked, ie. a new building will result in new emissions and new extraction, both of which cause environmental harms. However, they are different issues.

What occurs at present is that Circular Economy policy is used to justify the demolition of existing buildings without considering the carbon emissions that will result. The thinking is along the lines that "it is ok to demolish this in-situ concrete (or other) building because we are going to grind the concrete up into aggregate and re-incorporate it into new construction" (normally elsewhere). The problem is that this process causes a high level of carbon emissions and does not prevent the large amount of new materials and emissions, resulting in environmental damage globally.

3.5 Operational energy

The London Mayor, permits developers to offset operational carbon targets not met, for example:

Demolition and rebuild of 100 Gray's Inn Road and 127 Clerkenwell Road,
2022/4259/P, a total of 1,302 tonnes CO₂ were off-set.

Demolition and rebuild of 95-100 Tottenham Court Road, 2020/5624/P, a total of 4,530 tonnes CO2e were off-set.

Redevelopment of Belgrove House, 2020/3881/P, a total of 7,116 tonnes CO2e were off-set.

Carbon offset payments do not actually offset the carbon targets that are missed. Developers pay £95/ tonne CO2e, but it costs up to £400 / tonne to make energy reductions to offset the equivalent emissions.

This shows that the Carbon Offset Fund mechanism is not working and should be abandoned. Off-setting generally does not work, due to the inability to truly offset the actual environmental harms resulting.

Developers should develop schemes that meet the requirements, even if that results in a development that does not fully exploit the land-value.

END

The accompanying appendices are examples of submissions made by CEC in respect of planning applications in Camden (see section 3.2).

**Email to Camden planners regarding planning application 2025/1684/P, 105 Judd Street
08.06.25**

Dear Sam Fitzpatrick,

We write regarding the above application, which we would like to be recorded as an objection:

The original permitted scheme (2022/1817/P) proposes demolition of practically all the internal structure except for the floor slabs, which require extensive propping whilst new structure is inserted. Extending the building upwards results in works so extensive that they can no longer be considered 'alterations' and should be considered a new building, including:

- Replacement of the internal vertical structural elements
- Provision of new foundations
- Upgrading of the fire resistance of retained floor beams

Climate Emergency Camden wants to see existing buildings retained, but in this case the level of replacement of existing construction with new construction is very high and results in a high level of harm to the environment and people, through excessive carbon emissions and the impact of resource extraction globally. It would have been possible to retain and use the existing building for office use without the extensive harms due to the new construction that have already been permitted.

EMBODIED CARBON

We are concerned that planning permissions of this nature are granted without any requirement provided in Section 106 agreements that the developer should meet carbon targets for the new construction (ie. Modules A1-5 of the Whole Life Carbon Assessment). Operational carbon targets are protected by the Section 106, but not 'embodied carbon'.

The WLC reporting spreadsheet accompanying the original application states that the carbon intensity of the concrete will be reduced using GGBS (Ground Granulated Blast Furnace Slag). Similarly, the structural steel is proposed to employ a 'high' recycled rate. These supposed intentions are not required to be complied with via the Section 106 agreement. In addition, the developer could alter the extent of original fabric retained during construction, increasing the WLC, as this is not sufficiently tied down by the Section 106 agreement, which only states requirements to:

(a) achieve the targets set out in the submission document entitled Sustainability Statement produced by Norman Disney & Young dated 13 April 2022

This does not include the stated proposed carbon footprint of the new construction as a target, ie. Modules A1-5 which is given as 3,689 tonnes CO₂e, or any requirement to

measure and report on the actual emissions resulting from Modules A1-5 on completion of the building.

OPERATIONAL CARBON

The operational energy requirements for the whole building should be as for new build, as it does not make sense to consider the lower floors as 'refurbishment' legitimising lower performance.

CURRENT APPLICATION 2025/1684/P

A new WLC assessment should be provided to reflect the additional construction proposed in the current application. This is missing from the current application documents uploaded on the planning website.

The performance of the building in terms of carbon emissions produced in construction, ie. Modules A1-5, should be an explicit target required to be met. It is currently excluded from the Section 106 agreement, and this should be rectified under this application.

Yours sincerely

Climate Emergency Camden



Sadiq Khan
Mayor of London
City Hall
Kamal Chunchie Way
London
E16 1ZE

5th May 2025

Dear Mr Mayor,

**Camden Council Reference: 135 -149 Shaftesbury Avenue
2024/0993/P and 2024/1005/L**

Climate Emergency Camden is a coalition formed in 2019 to give strong voice to advocacy for action on the Climate and Ecological Emergency, within LB Camden.

We are writing to request that under the powers afforded to you under article 6 of the Mayor of London Order (2008) that you direct refusal on the above applications for Planning Permission and Listed Building Consent. If you are not minded to direct refusal, then under the power afforded to you under article 7 of the Mayor of London Order (2008) and 2A of the Town and Planning Country Act 1990 we respectfully invite you to call-in the applications for Planning Permission and Listed Building Consent.

We have made representation to Camden's Planning Committee on the following grounds:

DEMOLITION OF THE EXISTING BUILDING

This application is for the demolition of an existing building, which is listed, except for the front and side façades, and building of a new one. A façade retention scheme does not 'repair and restore' an existing building, it destroys it.

It will of course cause 'harm' to a building if you demolish it. It is no longer a building, but a retained façade. This application description does not make this clear. To call the upper parts of the building a 'roof extension' is also erroneous. It is a new, very large building, sitting behind the screen of the retained façade.

Objections to the scheme have been ably made by heritage organisations Historic England, 20th Century Society and SAVE, as well as many other amenity societies.

The applicant wants to build a large hotel on the site and is demolishing the existing building to do so. It should not be permitted for several reasons, including the impact of the excessive bulk on neighbours. Climate Emergency Camden would like to highlight the harm caused by high amount of carbon emissions resulting from the proposed development as a principal reason for refusing this application.

ENVIRONMENTAL IMPACT

Carbon emissions caused by construction

The officer's report contains no evaluation of the global environmental harms caused by the carbon emissions resulting by the construction of the new building. The building will cause a high level of unnecessary carbon emissions which should be avoided at this critical time for climate mitigation.

As is usually the case with Camden's planning reports, the total quantity of carbon emissions is not mentioned (it is **10,228 tonnes CO₂e**, on top of the 56,000 tonnes just approved for the demolition and rebuilding of Euston Tower); yet another planning application recommended for approval without consideration of the existential threat of climate breakdown. The large amount of carbon-heavy construction being permitted in Camden is not in accordance with the carbon budgets set by the Climate Change Committee and is not compatible with retaining a liveable climate for billions of people.

Retaining the existing theatre would avoid these harms. The new basement has a particularly high carbon footprint, requiring an excessive amount of excavation and use of concrete and steel to form a new structure. This was raised by the Camden Design Review Panel.

This, alongside the heritage harms, should lead officers to reject the unnecessary demolition of the existing building.

Carbon emissions caused by operation of the building

The officers' report confirms that the building is high carbon in terms of operational carbon, and makes the following recommendation:

*“14.27 **Consideration** should be given at the next design stage to any additional opportunities to reduce the carbon impact of the building in operation through additional consideration of energy efficiency. Condition 10 is recommended to require a **feasibility study** with the aim of maximising energy efficiency measures.”*

This is **completely inadequate** as development control. The scheme should not be granted consent of any kind until the applicant has designed a building which meets Camden's energy efficiency requirements. The design is plainly profligate in its use of glazed curtain walling and brick 'fins'. These are an inherent part of the design and should not be permitted; they cannot be magically turned into a compliant design

through an optimistic clause like this. Camden's Design Review Panel have picked up this up; why have Camden officers not required better?

Carbon-offset payments are proposed by officers, as is usual, to make up for lack of compliance. It should be noted by committee members that these carbon-offset payments do not actually offset the carbon emissions that will result from the development. This is because the developer only pays £95.00 tonneCO₂e, but it costs up to several times that amount for Camden to fund an equivalent amount of emissions savings elsewhere in the Borough. The system fails to meet Camden's 'zero-carbon' commitments and is effectively **greenwash**.

CAMDEN DESIGN REVIEW PROCESS

The Camden Design Review Panel in its most recent report, states that it “**remains concerned that other issues remain unresolved**, including the project's **embodied carbon intensity, impact on the Phoenix Garden**, deliverability, and risk of **damage to the listed building**.”

DECISION BY CAMDEN'S PLANNING COMMITTEE

Camden's Planning Committee approved the applications, and we believe that they were wrong to do so.

Yours sincerely

Climate Emergency Camden

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WRITTEN SUBMISSION and DEPUTATION

Redevelopment of Euston Tower

Planning application ref. 2023/5240/P

16.03.25

Climate Emergency Camden opposes this application. We examined the original application and made a submission early in the consultation period. The scheme has been altered since the application was submitted. The proposed Gross Internal Area has been enlarged by 2,300m², meaning that building area increase has **gone up from 41% to 45.6%**. The development remains greedy.

As we show below planning officers have ignored the impact of development on current and future generations due to climate breakdown caused by continued high levels of CO₂e emissions in assessing the application.

ASSESSING FEASIBILITY FOR REFURBISHMENT

In the Planning Report, officers have sided with the developer instead of safeguarding our ecological systems and wellbeing. Despite saying that “The refurbishment of the existing building is considered technically possible and more sustainable”, they accept the developer’s statement that the existing building is not viable for ‘lab-enabled offices. That should lead planning officers to tell the developer that lab-enabled office is not an acceptable use because the proposed works are incompatible with a future climate that sustains human life and livelihoods.

As usual, the planners have required that the developer carry out a feasibility study looking at options for retention, and as usual the planners have gone along with the developer’s preferences. This is a form of performance that planners think is necessary to show that they are doing their job, but it is worthless. These expensive exercises, requiring appointment of multiple specialist consultants, always come to the same conclusion: the developer can do just what they like to the environment. To pretend that this a ‘Partial Retention and Extension’ option is a fallacy. It is a new building, as stated in the planning application title.

The existing building is being demolished because of the lab space component of the proposed building’s use. The Independent Review states, “*If lab space is a driver for the future use of the building, additional floor-to-floor height will be required over and above the contemporary office requirement*”.

In this case there isn’t even a client identified for the building- this is a speculative development.

ENVIRONMENTAL IMPACTS

The revised up-front carbon emissions resulting from construction have **increased from 55,000 tonnes CO₂e to 56,000 tonnes**. It is a shame that engagement with Camden’s planners over the past year has not resulted in a *decrease*. Why not?

Planning officers do not mention the quantity of up-front carbon emissions due to construction in the report. It is concealed within the Whole Life Carbon assessment and then given as a rate per m². The CO₂e/m² figure averages emissions over a 60-year period.

The WLC figure is given as 97,780 tonnes CO₂e, which over 60 years is 1,630 tonnes CO₂e per year, a much less significant figure than the **56,000 tonnes** that will occur over the next few years if this application is permitted.

Whole Life Carbon assessments make it easier to obfuscate. They ignore the fact that we do not have 60 years to make meaningful changes. As Climate Emergency Camden has reported to the planning committee, to have a chance of staying within 2 degrees of global warming the UK must **radically** reduce its overall carbon emissions now. The planning report does not demonstrate how harmful carbon emissions from construction and associated extraction of virgin materials and resource use really are.

The independent report commissioned from Buro Happold by Camden raises ‘concerns’ about the methods for establishing the ‘magnitude’ of effects on the ‘receiving environment’, saying:

“Sufficient clarity has not been provided in the updated ES chapter. It is requested that the Applicant provides further clarity on the ICCI methodology, including the climate change sensitivity and vulnerability criteria that have been used, and how these factors have been taken into account in the significance of effect judgements.”

Climate scientists decry how governments at all levels have not been truthful about climate breakdown (www.carbonindependent.org). The planning report is a case in point. The up-front carbon should be clearly stated and the related harms assessed.

It is disappointing that the GLA has not commented on these crucial matters. They, along Camden officers and members, seem persuaded by British Land’s story that the building is “sustainable” and, moreover, must be adapted for lab-enabled offices.

Nationally we have carbon budgets that should be met if we are to make our contribution to global targets. These are completely ignored in the planning report.

SUSTAINABLE DESIGN AND CONSTRUCTION

It is symptomatic that ‘Sustainable Design and Construction’ comes way down towards the bottom of the list in Camden’s Planning Report, at item 18. Camden’s planners work hard to get out of the commitments of Camden declaration of a Climate and Ecological Emergency. They don’t scrutinise the high carbon footprint of the development or recognise expanding the building area by 45.6% is problematic. They swallow a false idea that recycling the demolition material validates the proposal.

Current circular economy policy gets developers off the hook too easily. On top of the 56,000 tonnes CO₂e caused by the construction of the new building, there will also be unquantified carbon emissions caused by unnecessary recycling of demolished building fabric.

Regarding carbon emissions caused through use of the building (‘operational carbon’), the development does not meet the policy targets, meaning that a carbon offset payment of £716,023 must be paid to the Council (at the rate of £95/tonne CO₂/yr). The money is supposed to be spent on carbon reduction measures around the Borough, but the offset process is flawed. An equivalent emission saving costs around three times the offset amount and even then Camden struggles to dispense offset money which is accumulating at an alarming rate. It is plainly much more efficient to make developers meet climate change targets by building actually sustainable buildings or by using existing buildings appropriately to limit construction work.

CEC’s focus is the environmental impact on human wellbeing due to climate and ecological breakdown. We urge the Committee to refuse permission of British Land’s harmful development on the grounds that it worsens the risk of irreversible climate breakdown with catastrophic impacts for all of humanity.

Email to Camden planners regarding planning application 2022/2510/P_ Selkirk House
22.10.23

Dear David Fowler,

Climate Emergency Camden welcomes the fact that Camden Council is using qualified external consultants to advise planning officers about the carbon impact of new development.

In relation to the Selkirk House planning application, we have reviewed the final issue the Independent Review of the Retention & Redevelopment Options Study, issued 20.10.23, and make the following comments:

Ref. page 15:

The use of the building for residential has not been shown to be unfeasible. The report states:

“The last claim on unsuitability of residential use in Selkirk House tower should be supported by further evidence and data. The applicant should clarify what would be the maximum floor-to-ceiling height achievable for residential use. Inability to provide dual aspect flats should also be proven.”

Given that the Borough’s need is for more residential not more commercial space, it is obvious that this needs further consideration before the application is brought to committee.

Ref. page 21:

The report states:

“Our opinion provided as part of the initial review remains unchanged: in absence of more detailed guidance by policy, it’s difficult to argue that the preferred option (Option 4), which involves substantial demolition of existing buildings above ground, is justified in terms of optimisation of resources.

The proposed development maximises the site value, delivering more lettable space (NIA) and enhancing site capacity. These benefits however come with a higher cost, in terms of arising demolition waste, new construction materials needed and upfront embodied carbon.”

This is the most obvious reason to refuse the application: we are facing a climate and ecological crisis, and unless we collectively make extensive efforts avoid unnecessary construction materials needed and upfront embodied carbon, we are headed towards an unliveable future.

Ref. page 24:

The report states

"The arguments provided by the applicant in support of the demolition of floors 4-13 are all valid points, but there is no evidence showing that these issues cannot be overcome through appropriate design measures. As such, retain and improve the floors 4-13 of the existing Selkirk House doesn't seem beyond the realms of possibility."

It is clear that the report's authors agree that the requirement for demolition is not proven and is not justified.

In summary, we think that the following actions are necessary before making recommendation for determination of the application and proceeding to committee:

1) Planning officers should require the building to be properly considered for residential use, as required by planning policy (Camden's Local Plan requires reuse of existing buildings to be prioritised).

2) If planning officers believe that the minor and unnecessary benefits to the urban realm or the increase in lettable office space justify the damage to the climate and the planet's ecosystems, they must explain in specific terms to the planning committee on what basis they have made this value judgement. They should be aware that continued 'business as usual', as represented by this proposal, is not acceptable in this time of climate and ecological crisis and that they will be held to account for decisions that will cause harm to human health and livelihoods.

Yours sincerely

Built Environment Group
Climate Emergency Camden