



RESPONSE to Camden's Site Allocation Local Plan
PLANNING FOR LOW CARBON, LOW IMPACT DEVELOPMENT
23.01.22

Climate Emergency Camden (Built Environment Group) have prepared the following response to the proposals set out the Site Allocations Local Plan in respect of climate change mitigation. This document is separate to Climate Emergency Camden's overall response to the SALP.

SUMMARY

Climate Emergency Camden does not think that the plans for proposed development are "sound" in respect of the urgent need to mitigate climate change and ecological damage globally.

The consultation webpage starts with the following invitation:

Help us make sure that the Site Allocations Local Plan does all it can to tackle Climate Change in Camden

Greenhouse gas emissions caused by the construction of new buildings and infrastructure, known as 'embodied carbon emissions', are a significant driver of climate change. These emissions amount to just under 50MtCO₂e per year in the UK, **in excess of 10%** of our national emissions. There are 149 countries in the world whose entire national carbon footprint is smaller than the footprint of the UK's construction sector.

We need to be planning the reduction of the carbon and ecological impact of construction in Camden. The proposed Site Allocations Local Plan fails to do this and is therefore not fit for purpose.

1) GROWTH AREAS

There is not sufficient justification provided for growth areas proposed in the Site Allocations Local Plan. CEC would like to see evidence-based targets that respond to actual need for housing and business space in Camden. The GLA's 'growth agenda' causes the construction of buildings as investments, rather than to meet need, eg. at Nine Elms where most flats remain empty. The same applies to the continued production of new office space, the requirement for which has not been tested post-pandemic with increased working from home. The plan appears opportunistic and not guided by the necessity for planning for a 'one-planet' economic model.

Unnecessary, untargeted construction, built for profit results in:

- Increased CO2e emissions from construction and use of the building
- Ecological damage globally due to resource extraction for the manufacture of building materials

Before expanding growth areas, and intensifying existing growth areas, for the sake of 'growth', far more analysis needs to be done to establish the current provision of business space and homes in the proposed growth areas.

Policy HCG1 Holborn and Covent Garden Growth Area

The whole ward has been allocated as 'growth area' and we see the results of this with a range of damaging planning applications, eg the Network Building and Selkirk House. The designation as a 'growth area' appears to mean that what would normally be refused for a range of proper planning policy reasons, such as protecting the historic built environment, are ignored.

Policy CGY1 Camden Goods Yard

The permitted scheme for the large part of this site shows what happens with an unchecked growth agenda giving developers free rein. It is overly dense and badly planned (confirmed by the Camden Design Review Panel), resulting in narrow public spaces which will be overshadowed, insufficient greenspace and high-carbon construction. This type of development needs to be a thing of the past if we are to address the Climate and Ecological Emergency in a meaningful way.

Planning policy should constrain development to what can be shown to be needed for a comprehensive plan to meet Camden's actual need, and to meet the challenge of the Climate and Ecological Emergency.

2) REUSE OF EXISTING BUILDINGS

Camden's Sustainability Policy CC1 clearly states that there is a presumption in favour of retrofit. However, this policy is not applied, and the balance invariably falls in favour of the developers' preference for demolition and rebuild.

We have seen over the past year planning officers fail to require that developers look at the retrofit options in a thorough way, enabling developers to dismiss retrofit in

favour of demolition and rebuild through lack of proper scrutiny. This happened with the Network Building application and is happening again with Selkirk House.

Planning permission was granted for the demolition of the Network Building and redevelopment of the site despite the fact that the existing building is suitable for retrofit and this would result in a significant reduction of CO2e emissions (a fact not disclosed to the Planning Committee). Please see attached Appendix 1 which shows the total CO2e emissions resulting from the permitted scheme, compared to a comprehensive retrofit scheme.

If Camden Council continues to allow proposals for existing buildings to be demolished and replaced without properly prioritising retrofit solutions, it will not meet the Council's stated climate change mitigation commitments.

There needs to be much more emphasis on existing buildings within the plan, not just 'sites'. The plan should include a register of all significant buildings in Camden that have the potential for comprehensive retrofit and timeframe for when this work should be done to meet the UK's climate change commitments.

Comments on questions on the website:

Are there any sites set to be allocated in the Site Allocations Local Plan that you think could do more to help ease the climate crisis in Camden? If yes, state which site and your suggestions:

Response: YES

Policy WH11:	West Hampstead Interchange	Retain existing O2Centre
Policy IDS	Land to the Rear of the British Library	Retain recent extension to the British Library

Demolition of these buildings, and replacement, would result in an unnecessary amount of CO2e emissions and should not be permitted. This should be clearly stated in the policies.

Policy HCG3:	1 Museum Street	Retrofit the existing buildings
Policy HCG2:	Former St Martins	Retrofit the existing buildings
Policy IDS11:	Wendling Estate	Retrofit the existing buildings
Policy IDS13:	West Kentish Town Estate	Retrofit the existing buildings

If all these buildings were retrofitted instead of being demolished and rebuilt the saving in CO2e emissions would be in the region of 250,000 tonnes. This should be a planning consideration but is not being considered at present. Developers are not generally asked to provide retrofit options for consideration, and if they do the proposals are not properly scrutinised.

3) LOW CARBON DEVELOPMENT

Not sufficient attention is given within the plan for how to reduce CO2e emissions caused by construction ('embodied carbon'). In Camden, new buildings continue to be built with high embodied carbon materials, eg. structural concrete frames.

The new buildings at Highgate Newtown development for example could have been built with a mainly timber and steel structure (steel is more recyclable than concrete), which would have saved a large quantity of CO2e emissions. This requires changing 'business as usual' in the construction industry. This is gradually happening but needs to be strongly mandated through planning policy in order to speed it up.

Please see following link to a recent report by ACAN, [The Carbon Footprint of Construction](#)

The embodied carbon targets included in the London Plan are not sufficiently ambitious and should be increased by Camden planning policy. It is also noted that the GLA's Whole life carbon methodology is often used to justify high initial carbon emissions caused by construction by evaluating the overall emissions over a 60 year span. This enables developers to continue to build high-carbon construction in the next 10-20 years, which is the very time we should making radical reductions,

In a similar way, the BREEAM methodology not a suitable metric for meeting government 2035 and 2050 targets for CO2e emissions reduction.

Low carbon construction will limit the height of new construction, which will generally be of benefit to the liveability of the urban environment.

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Response: YES

Policy CGY1:	Camden Good Yards	Add requirement for low carbon construction
Policy CSP1:	Camley Street and St Pancras Way	Add requirement for low carbon construction
Policy KT1:	Kentish Town Area	Add requirement for low carbon construction
Policy WHI1:	West Hampstead Interchange	Add requirement for low carbon construction
Policy IDS1:	Individual Development sites	Add requirement for low carbon construction

4) PROPOSED AMENDMENTS TO THE PLAN

The Site Allocation Local Plan should be amended to include:

Embodied carbon targets for designated areas of development

Include an assessment of development areas based on the potential embodied carbon impacts taking into consideration soil conditions and building typologies as well as transportation and energy use.

Bio-based materials for designated areas of development

Include requirements for the use of low carbon impact and ecologically beneficial materials in designated development areas based on building typologies.

Register of existing buildings

Include a register of all significant buildings in Camden that have the potential for deep retrofit, and a proposed timeframe for carrying out this development to meet the UK's climate change mitigation targets.

Appendix 1

Planning application 2020/5624/P

Approved by Camden Council. When the planning committee asked whether there were not significant savings resulting from the retrofit option this was denied by the planning officer. In fact over a 60 year period this would have resulted in a saving of at least 8,500 tonnes CO₂e.

