

## WRITTEN SUBMISSION

### **Saville Theatre**

Planning application ref. 2024/0993/P and 2024/1005/L  
24.04.25

## 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, 20<sup>th</sup> 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 CO<sub>2</sub>e**, 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 tonneCO<sub>2</sub>e, 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**.

### SUMMARY

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**.”

Why then are Camden officers recommending this application for approval?

Climate Emergency Camden advise committee members to refuse the application.