



## **TOWARDS A NEW LONDON PLAN**

### **Comments by Climate Emergency Camden's Built Environment Group**

22<sup>nd</sup> 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 CO<sub>2</sub> were off-set.

Demolition and rebuild of 95-100 Tottenham Court Road, 2020/5624/P, a total of 4,530 tonnes CO<sub>2</sub>e were off-set.

Redevelopment of Belgrove House, 2020/3881/P, a total of 7,116 tonnes CO<sub>2</sub>e were off-set.

Carbon offset payments do not actually offset the carbon targets that are missed. Developers pay £95/ tonne CO<sub>2</sub>e, 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).