

**From:** CE Camden

**Sent:** 22 October 2023 10:20

**To:** David Fowler

**Cc:** Heather Johnson (Cllr); Hattie Hartman; jules pipe; Michael gove mp; architects declare; Sian Berry (Cllr); d carrier; Bethany Cullen; Planning; Sagal Abdi-Wali (Cllr); Lotis Bautista (Cllr); Nasrine Djemai (Cllr); Tommy Gale (Cllr); Lloyd Hatton (Cllr); Liam Martin-Lane (Cllr); Andrew Parkinson (Cllr); Tom Simon (Cllr); Sue Vincent (Cllr); retro first; Will Hurst

**Subject:** Selkirk House, planning ref 2023/2510/P

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