



Written Submission to Planning Committee

16th November 2023

Planning application: Selkirk House, 166 High Holborn, 10-12 Museum Street, 35-41 New Oxford Street, and 16A-18 West Central Street _ 2023/2510/P

Climate Emergency Camden calls on Camden Council to refuse permission for the demolition of Selkirk House, because of the carbon emissions that will result- adding to climate breakdown- and the waste of existing material resources. Michael Gove, the levelling up secretary, has shown the way with his intervention to save Oxford Street's Marks and Spencer building from demolition. He said he had made the decision partly because it would "fail to support the transition to a low-carbon future, and would overall fail to encourage the reuse of existing resources, including the conversion of existing buildings".

Camden Council has the policy instruments to refuse this application (namely the requirement to retain existing buildings) and it is urgent and imperative that they do so:

- The case for demolition has not been proven
- Difficulties in adapting the building to office use (its original use) could be overcome
- The use of the building for residential use has not been shown to be unfeasible
- Demolition of the existing building is not justified in terms of optimisation of resources.

Most people in the media and politics do not understand the very serious situation that we are in. Despite alarm bells ringing over the past 5 years, and global warming being known about for the past 50 years, they still act as if this is unexpected. This is the only the beginning and it will get worse. We cannot avoid the harmful effects of greenhouse gas emissions resulting from industrial processes entering the atmosphere. This has already happened and is destabilising weather systems, increasing temperatures and arctic sea ice melt; we face a very doubtful future.

Plans to reduce greenhouse gas emissions have been ineffective to date. Global emissions and the UK's emissions continue to rise. At present only 6% of global energy use is from renewable sources and 80% is from fossil fuels. Demand for energy use is set to increase by 50% by 2050, due to the industrial consumer society that we live in and economic orthodoxy that insists on growth. We need billions spent on reducing energy use and transition to renewable years, but this is going to take decades. The only way we can avoid catastrophic climate breakdown is to take immediate action to cut GHG emissions. The only effective way of doing that is to change 'business as usual' and radically cut consumption. This includes the consumption of new construction materials.

Construction materials have a very high embodied carbon footprint. 1 m3 of brickwork results in about ½ tonne of CO2e emissions; 1 m3 concrete is ¾ tonne. Compare that with 1/3 tonne for a transatlantic flight from Heathrow to New York. This is why demolishing buildings unnecessarily should not be countenanced at this current time. Constructing new buildings causes a massive amount of GHS emissions. The manufacture of steel and concrete cause about 15% of global emissions.

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:

Ref. page 15: 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."*

The use of the building for residential has not been shown to be unfeasible. 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 determined.

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."*

This is the most obvious reason to refuse the application: 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."*

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

Planning officers have ignored the advice implicit in Hilson Moran's reports. They have failed to justify their recommendation for approval in relation to the climate and ecological emergency that we face and are therefore negligent. Planning policy requires mitigation of climate change, and refusal of development that will exacerbate it.

The application should be refused and the building to be properly considered for re use, as required by planning policy (Camden's Local Plan requires reuse of existing buildings to be prioritised).