

Application No:	Consultees Name:	Received:	Comment:	Response:
2023/5240/P	Climate Emergency Camden	12/05/2024 11:44:55	OBJ	<p>Climate Emergency Camden objects to the proposal, on the basis that it is incompatible with our chances of securing a liveable future on this planet. Planning Policy requires development to mitigate climate change not exacerbate it.</p> <p>The redevelopment only retains 31% of the existing structure; this figure needs to be much larger, in the region of 80-90%.</p> <p>The proposal for rebuilding the Euston Tower is a greedy development, with a 40% increase of the floorspace over the existing building. The new building results in 55,000 tonnes of GHG emissions, 19% results from the steel used in the new structure and 23% from the new concrete cladding. The manufacture of steel requires a huge amount of energy and currently results in over 7% of global emissions. Cement used for concrete results in 8% of global emissions. Their use in construction should be minimised wherever possible.</p> <p>The carbon footprint of the new building is 711kg emissions for every 1m² of floorspace. The GLA's current benchmark for new office buildings is 950kg, with an aspirational target of 600kg. In order to be considered 'green' the aspirational target should be met as a minimum.</p> <p>The ground floor footprint of the building is nearly doubled, with a massive 1.5m thick concrete raft supported by many new piles. If British Land retained the existing building volume the carbon cost of the new building would be significantly reduced. The refurbishment option presented in the feasibility study would result in less than half the amount of carbon emissions (23,300 tonnes).</p> <p>The Circular Economy Statement required by the GLA is an opportunity to list the ways in which the materials resulting from demolition can be reused. But 92% of the material resulting from the demolition Euston Tower would be reinforced concrete, most of which can only be reused if it is crushed down to form aggregate. This process requires high levels of energy, which adds to the already large amount of harmful greenhouse gases being released into the atmosphere. The emissions cause by the demolition and processing is not accounted for in the Whole Life Carbon assessment. It should be, but the boxes to be filled in are just left blank.</p> <p>When it comes to the emissions caused by heating and powering the proposed building, the GLA says that this not nearly good enough: it is estimated to achieve a 14% reduction in CO₂ emissions compared to 2021 Building Regulations, whereas it is meant to be at least 35%. This is going to mean that the developer will have to resort to using carbon offsetting to achieve its required performance, which has been shown to be a very ineffective way to reduce carbon emissions.</p> <p>It has to be questioned, therefore, whether demolition of the existing building is a sensible way forward. The feasibility options carried out by British Land looked at a number of options including residential. Unfortunately the developer has spent a lot of money on work designed to prove that retrofit does not work for their proposed use. Because 'optimum' office accommodation cannot be achieved with retrofit, refurbishment is ruled out. In fact the only type of use that the existing building cannot support is laboratory use, which is what the developer wants. It is an inappropriate use for the existing building.</p> <p>It should also be questioned whether the area needs yet more 'lab-supported' office space. There have already been many planning permissions granted for this building type in the area, and the resulting mono-culture will not serve the community well when the impacts of climate change are experienced. A more</p>

Application No: **Consultees Name:** **Received:** **Comment:** **Response:**

resilient and regenerative type of town planning is needed. There are better locations for this type of use, eg. the unused office towers in Canary Wharf. We have to find ways of working with what we have inherited, the construction of which has already caused a great deal of ecological harms, not compound it with more unnecessary construction.

Climate Emergency Camden
