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By email only

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22/08/2024

Dear Christopher Smith,

#### **Planning Application 2024/1267/P**

1. We write by way of further comment on Planning Application 2024/1267/P and with reference to the applicants "Addendum to Design and Access Statement to provide supplementary information in support of Section 73 application for amendment to planning permission ref 2021/6105/P".
2. The updated Design and Access Statement primarily attempts to demonstrate how the proposed development conforms to the Camden Local Plan 2017, specifically Policy CC1 (Climate Change Mitigation). The Design and Access Statement Addendum is dated 11 June 2024.
  - 2.1. There is a subsequent "Whole Life Carbon Statement" from Twin and Earth, dated July 2024, which, apart from demonstrating that our environment is an afterthought, is irrelevant as the applicant has not discharged the requirements of The Camden Local Plan CC1.
3. The addendum overlooks the emerging policies outlined in the Draft New Camden Local Plan, released in substantive form in January 2024.

#### **Planning Permission reference 2021/6105/P**

- 3.1. *The Planning Officer submitted the following written evidence as part of her statement to the planning committee who approved the development:*

*"Executive Summary:*

*ii. The existing building is used as offices and the proposals are for the extension, refurbishment and intensification of the office use. The refurbishment to provide high quality, flexible office space and the intensification of the existing employment use within the Central Activities Zone would be in accordance with both local and national policies*

*Land use principles: Office Use*

*Conclusion:*

*7.25 Given the location of the site within the CAZ and Knowledge Quarter and the existing office use of the site, the refurbishment and intensification of office use is considered appropriate in this location, and the development would contribute towards a successful and inclusive economy*

*Planning Officers Conclusion:*

*19.1 The proposed development is a well-considered scheme which would be in accordance with local and national policies.*

*19.2 With regard to land use, the proposals involve the refurbishment and intensification of the existing office function of the building, utilising unused land to the rear of the site to provide an uplift in floorspace with a flexible floorplate to cater for future changes in demand. The refurbishment to provide high quality, flexible office space and the intensification of the existing employment use within the Central Activities Zone would be in accordance with both local and national policies. No housing would be provided which is accepted after the applicant has demonstrated that the provision of a policy compliant mix of office and housing at the site would not be viable and would put the scheme into significant deficit. A late-stage review shall therefore be secured by S106 agreement should the viability position change.”*

**Camden Local Plan Policy CC1 and Acceptance by LB Camden that it is possible to retain and improve the existing building:**

- Existing Policy CC1 underscores the Council's commitment to mitigating and adapting to climate change. It mandates that all developments in Camden proactively address the climate emergency by prioritising the repurposing and reuse of existing structures over demolition. It states that LB Camden Council will:

*“require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building”*

- The recent granting of planning permission in December 2023 for the project detailed in Planning Reference 2021/6105/P is not merely a procedural milestone but a definitive statement regarding the viability of retaining and improving existing structures under the stringent guidelines of Policy CC1, which mandates climate change mitigation. This policy specifically requires that all proposals involving substantial demolition must unequivocally demonstrate the impossibility of retaining and enhancing the existing building. The approval of this application (2021/6105/) sets a clear precedent, affirming that retention and improvement of existing infrastructure is not only possible but also preferable.

6. The approved project involves:

*"Refurbishment and extension of the existing building to provide new entrances, a new rooftop pavilion, rooftop plant equipment and enclosures, rear extension, and cycle parking associated with Class E use together with new hard and soft landscaping and other ancillary works."*

This extensive scope of work underscores a crucial point: the existing building's structure and framework are fundamentally sound and adaptable enough to support significant modifications and enhancements. This approval illustrates that even ambitious architectural and functional upgrades can be successfully integrated without resorting to substantial demolition, aligning perfectly with the goals of Policy CC1.

7. The "Whole Life Carbon Statement" issued by Twin and Earth in July 2024 raises additional concerns about the prioritisation of environmental considerations in the project planning process. Despite its intent to outline the carbon footprint associated with the lifecycle of the development, the document, rather than serving as a proactive measure of sustainability, appears reactionary, treating environmental impact as an afterthought rather than a cornerstone of planning and development. This approach is fundamentally at odds with the proactive and integrated environmental planning mandated by the Camden Local Plan's Policy CC1.

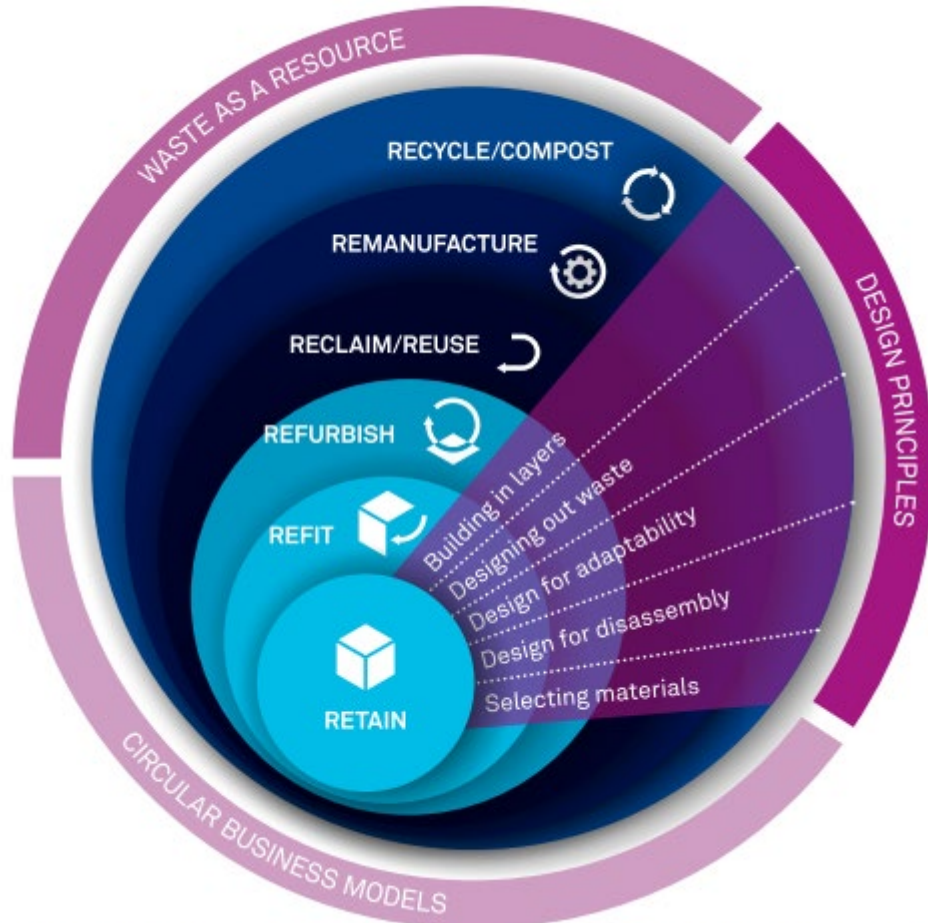
8. Critically, this Whole Life Carbon Statement falls short as it does not address the core requirement of Policy CC1—that all development proposals which involve substantial demolition must first demonstrate the impracticality of retaining and improving the existing building. The omission to meet this preliminary condition renders the statement irrelevant in the context of policy compliance. Without fulfilling this key requirement, any subsequent environmental assessments or statements, regardless of their detail or scope, cannot be considered sufficient to justify the development under the stringent standards set forth by the local plan. This oversight underscores a significant disconnect between the proposed actions of the development and the strategic environmental objectives that are meant to guide such projects from inception through to completion. Such a gap not only undermines the specific aims of the policy but also calls into question the commitment to genuine sustainability in the development process.

8.1. We would also remind LB Camden Council that The London Plan, "Policy D3 Optimising site capacity through the design-led approach" is non biased, not remunerated by the developer and clearly states:

*"Circular economy hierarchy for building approaches*

*Figure 3.2 shows a hierarchy for building approaches which maximises use of existing materials. Diminishing returns are gained by moving through the hierarchy outwards, working through refurbishment and re-use through to the least preferable option of recycling materials produced by the building or demolition process. The best use of the land needs to be taken into consideration when deciding whether to retain existing buildings in a development."*

Figure 3.2 - Circular economy hierarchy for building approaches



Source: Building Revolutions (2016), David Cheshire, RIBA Publishing ©

8.2. In addition, it states that:

*When it is intended to send waste to landfill it will be important to show evidence that the receiving facility has the capacity to deal with waste over the lifetime of the development. This information should be made available to the relevant waste planning authority to help plan for future needs.*

The applicant does not appear to have demonstrated with evidence the receiving facility has the capacity to receive the waste over the lifetime of the development.

9. By virtue of the fact that planning permission was granted, as recently as December 2023, for Planning Reference 2021/6105/P, the applicant has demonstrated, and the council have accepted that it is possible to retain and improve the existing building.

## Draft New Camden Local Plan (January 2024) & Emerging Policies

10. The revised version of Policy CC1, now included in the emerging policies, echoes and strengthens the directive from Policy CC1 of the 2017 plan, by reinforcing the focus on the reuse and refurbishment of buildings as opposed to demolishing them

11. Policy CC1 states that

*"The Council will prioritise the provision of measures to mitigate and adapt to climate change and require all development in Camden to respond to the climate emergency by:*

*Prioritising and enabling the repurposing and re-use of existing buildings over demolition"*

12. The recent revisions to the Emerging Policy CC1, which now explicitly states "Prioritising and enabling the repurposing and re-use of existing buildings over demolition," along with the introduction of "Policy CC2 - Repurposing, Refurbishment, and Re-use of Existing Buildings," underscore a significant policy shift by LB Camden. This shift is not merely administrative but a strategic reinforcement of the council's commitment to sustainable development practices. The explicit wording of these policies leaves no room for ambiguity—it is a clear directive that repurposing and refurbishing existing structures are not just preferred but expected within the borough.

## Policy CC2 - Repurposing, Refurbishment, and Re-use of Existing Buildings

13. Policy CC2 - Repurposing, Refurbishment, and Re-use of Existing Buildings outlines several critical mandates:

*"Policy CC2 - Repurposing, Refurbishment and Re-use of Existing Buildings*

- A. *The Council will seek to ensure that the repurposing, refurbishment and re-use of existing building/s is prioritised over demolition.*
- B. *Where sites include existing building/s, applicants will be required to undertake a condition and feasibility assessment, to understand the re-use potential of the existing buildings and explore the best use of the site. This should be undertaken at the earliest opportunity, as part of the design process.*
- C. *Taking into account the findings of the condition and feasibility assessment, applicants will be required to demonstrate that alternative development options (such as refit, re-use, refurbish, substantial refurbishment and extension) have been fully explored.*
- D. *Applicants should discuss the findings of the condition and feasibility assessment and the assessment of alternative development options (as set out in criteria B and C above) with the Council, at the earliest opportunity, before progressing the design of any scheme.*
- E. *The Council will only permit proposals that involve the partial or substantial demolition of existing building/s, where it can be demonstrated to the Council's satisfaction that:*
  - i. *The applicant has comprehensively explored a range of alternative development options, informed by the condition and feasibility assessment, prior to considering full or partial demolition.*

ii. *The proposal constitutes the best use of the site, when considered against alternative options involving the retention, repurposing, refurbishment and/or re-use of the existing building/s.*

F. *Where it is demonstrated to the Council's satisfaction that the partial or full demolition of existing building/s is justified, the applicant will be required to submit a pre-demolition audit. This should demonstrate that the re-use of materials has been explored on site; identify all materials within the building and document how they will be managed; show how building material waste will be minimised; and demonstrate that circular economy principles have been applied in accordance with Policy CC3 Circular Economy and Reduction of Waste."*

14. Several important issues arise from these stipulations:

14.1. It is explicitly required by the Council that the repurposing, refurbishment, and re-use of existing buildings take precedence over demolition. LB Camden previously granted permission for these actions under planning application 2021/6105/P. This permission was granted as recently as December 2023 meaning that it is in full force and very relevant to determining whether repurposing, refurbishment and re-use of existing is more suitable than demolition. Given this context, the proposed demolition is entirely unnecessary and inconsistent with the original permission and Policies CC1 and CC2.

14.2. The original date for commenting on the planning application was 5 May 2024. The Design and Access Statement provided by the applicant is dated 11 June 2024 (made public on 18 July 2024). This delay contrasts sharply with the policy requirement that such assessments be conducted "at the earliest opportunity." The timing suggests that the study was reactive, produced in response to our formal objection regarding the proposed demolition, and not as part of a proactive and thorough design process.

14.3. There does not appear to any specific condition and feasibility report, as is required.

14.4. We see no evidence that the applicant has complied with paragraph D.

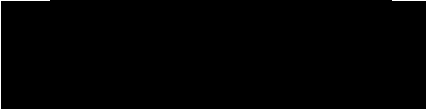
14.4.1. We request that LB Camden Council confirm whether the applicants discussed the findings of the condition and feasibility assessment and the assessment of alternative development options (as set out in criteria B and C above) with the Council, at the earliest opportunity, before progressing the design of any scheme?

14.4.1.1. If these discussions and meetings took place, please make public to the community all contemporaneous documents, notes etc.

14.5. The application is contrary to Paragraph E

15. Thank you for considering these additional comments.

Yours faithfully



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