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5 Willoughby Street, London WC1A 1JD

### **ARCHITECTS' SUBMISSIONS ON SUSTAINABILITY**

Selfish Wastefulness: Application Number 2021/2954/P 1 Museum Street, a proposed development by LabTech

We are a group of local architects concerned about the contribution made by construction to the escalating climate disaster engulfing the world. Camden has declared a climate emergency and has devised policies designed to limit carbon emissions. We would urge Camden to adhere to its own policies by refusing this proposed development.

On 8<sup>th</sup> June 2021, Radio 4's World Tonight included an interview with Barnabus Calder, an architectural historian and Senior Lecturer at the University of Liverpool, who has recently published 'Architecture from Pre-History to Climate Emergency' (Pelican).

His interview called for a revolution in how we think about buildings; he argues that,

'demolition and replacement should be seen as a sign of incredibly selfish wastefulness, to pull down viable buildings and replace them with new buildings which will cost an amount of fossil fuel and greenhouse gas that the new building will never repay'.

The architectural profession is now acknowledging the crucial role to be played by design and construction in tackling the climate emergency.

Clearly the existing building can be retained and used economically, as until purchased by LabTech, the hotel chain Travelodge were operating what appeared to be a successful hotel within the building and previously Trust House Forte used the building as their office HQ. The extensive car parking area could be adapted and used for many other commercial uses that would not require the demolition of the whole building. The only reason LabTech wish to demolish Selkirk House is that they seem to want to construct a massive office tower, approximately 50% higher than the existing, and so bulky that it will double the commercial floor area. The motivation appears to be to maximise development return, not how can the existing building be adapted and indeed extended in a low-key and responsible manner.

Camden's current planning policies take account of these concerns and we set them out below as it is very evident that if one strips away LabTech's justifications, their scheme runs contrary to these and many other planning policies.

## Camden Local Plan: Climate Change Mitigation Policies CC1 and CC2

'The Council will require all developments to minimize the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation'

'We will require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building and expect all developments to optimize resource efficiency'.

"...the possibility of sensitively altering or retrofitting a building should always be strongly considered before demolition is proposed"

### Paragraph 8.17 states:

'All proposals for substantial demolition and reconstruction should be fully justified in terms of optimisation of resources and energy use, in comparison with the existing building.

Other relevant Camden policies include:

- · Guidance on sustainability statements in Planning Applications
- · Camden has declared a Climate and Ecological Emergency
- Camden has adopted the 'Camden Climate Action Plan 2020-25

Camden Planning Guidance – Energy Efficiency and Adaptation Paragraph 9.3 lists the benefits of retaining and refurbishing buildings:

- Reduces the requirement for virgin materials and reduces its embodied carbon impact
- · Keeps products and materials at the highest value for as long as possible
- · Maintains heritage value
- Minimizes demolition waste
- Reduces disruption of extensive demolition and construction works associated noise and transport impacts and likely air quality
- Cost and programme savings depending on the scope of refurbishment and
- Achieve BREEAM credits

Paragraph 9.5 Outlines the need to follow a hierarchy

Paragraph 9.6 schedules:

- i. Refit
- ii. Refurbish
- iii. Substantial refurbishment and extension
- iv. Reclaim and recycle

Option iii acknowledges the need to optimise site capacity and to alter the existing structure to meet future needs.

The environmental impact of construction and the built environment on carbon emissions and the climate emergency are becoming more widely appreciated and are reflected in Camden's planning policies.

Around 40% of the world's greenhouse gases can be traced to the construction and running of buildings<sup>1</sup>. A surprisingly large part of the impact consists of the building fabric and construction process. Concrete and steel are particularly egregious in their carbon footprints. Up to two-thirds of a building's total carbon footprint<sup>2</sup> relates to its construction (its embodied carbon) meaning that around 27% of world greenhouse gases relate to buildings' embodied carbon, a surprisingly high figure compared to more obvious carbon emitters such as the aviation industry (2.5%).

It is therefore of paramount importance that Camden follows its own planning guidance and insists on a prior consideration of the possibilities for refurbishment, extension and adaptation for this important site. The techniques of refurbishment and extension, retrofitting, are now well established and there are many successful examples, including in Camden, the UCL Bartlett School of Architecture, where the original building was substantially refurbished while retaining the original building structure. An example familiar to Camden is the council's former office building on the corner of Euston Road and Argyle Street, which has been successfully converted to create an attractive hotel, with additional floors to enhance usable floor area.

We demand vigorous officer scrutiny of the proposal against adopted sustainability policy, local, regional and national. It would be appropriate at this stage for officers to be clear that the **Council's** default position is not total redevelopment.

<sup>&</sup>lt;sup>1</sup> Barnabus Calder, Architecture: From Prehistory to Climate Emergency (Pelican Books)

<sup>&</sup>lt;sup>2</sup> Financial Times 21<sup>st</sup> May 2021, 'The tyranny of concrete and its costly carbon footprint' Layli Foroudi. Paloma Gormley of Practice Architecture, London is quoted, 'CO<sub>2</sub> emitted to produce a building makes up between 30-70% of a building's lifetime carbon [footprint]'. A building such as Selkirk House, with its reinforced concrete frame and cladding is likely to be at the high end of this range.

While we are focusing here on the subject of sustainability, we, as architects, have serious concerns about the viability of the whole project. These will be the subject of further written submissions.

## Signed by six local architects

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