

## Climate Emergency Camden's Written Submission on the O2 Centre planning application 2022/0528/P, 27.03.23

The 6<sup>th</sup> IPCC report shows that we are far off limiting global heating to 2 degrees C. Global Greenhouse Gas emissions are now 60% higher than they were in 1990, and we have now put more GHG emissions into the atmosphere since the first IPCC report was released in 1990 than in all of human history prior. If the world warms beyond 2 degrees C it is highly likely that we will activate 'tipping points' in the Earth's system that will take warming out of our hands, leading to a 'Hothouse Earth'. There is a risk of this even at 1.5 degrees C of warming. Some elements of the Earth's system have already tipped - such as the Arctic: ice free summers are now unavoidable and expected by 2030. The late Earth System's scientist, Professor Will Steffen advised that getting GHG emissions down fast has to be "the primary target of policy and economics" akin to a "wartime footing".

There are solutions to the climate crisis, but it will require a fundamental re-think of how we are living. This needs to start in Camden's Planning Committee. Unfortunately the planning report does not emphasise the Climate and Ecological Emergency to enable members to consider this properly.

Solutions to the climate crisis include **not building** high carbon developments like the O2 Centre scheme being proposed for approval, and **not demolishing** a building built only 25 years ago.

Under Section 25 'Sustainable Design and Construction', the report states (25.4) that because the site is highly accessible and car free, and that "*around 55% of the site is to be retained as open space which will include significant trees and planting. The principle of the scheme is therefore highly sustainable.*" Unfortunately this does not follow, for the following reasons:

### Greenhouse Gas Emissions

There is not sufficient consideration of the need to mitigate climate change in design of the scheme. Consideration of operational and embodied carbon is in terms of rates of CO<sub>2</sub>e/m<sup>2</sup> only, and the total very high quantum of GHG emissions resulting from the large scale of the development is not considered. The over-development of the site results in an unacceptably high level of GHG emissions:

1) GHG emissions resulting from construction is stated to **72,500 tonnes CO<sub>2</sub>e**. This figure is heavily dependent on the use of 'low carbon concrete'. If accepted, it must be subject to checking on site to show compliance, as it is likely that the developer will seek to renege on this commitment.

2) The carbon emissions resulting from maintenance of the buildings over a 60 lifespan is almost the equivalent at **56,700 tonnes CO<sub>2</sub>e**, which indicates the building design is not mitigating climate change.

3) The carbon emissions resulting from operating the buildings is **92,770 tonnes CO<sub>2</sub>e**.

The planning report lists the ways in which that the proposed development does not meet current standards and policy requirements, yet still recommends approval. This is unacceptable. It does not meet Camden Council's sustainability commitments and contributes to climate change.

### Operational Energy

**Ref. clause 25.6** The scheme does not meet the 35% on-site carbon reduction for commercial areas. The report says that "*a commitment is made to achieving this which would be secured through the s106 agreement*".

We do not accept that this is reasonable or safe provision. From our investigations Section 106 agreements are not an effective mechanism for securing energy performance requirements (eg. ref. planning application 2016/1771/P, where energy requirements have not been met nor enforced). The scheme should not be approved until a compliant scheme is included in the planning application documentation.

**Ref. clause 25.7** The scheme is dependent on carbon off-setting to meet its energy obligations. The total sum of £828,345 in respect of plots N3E, N4 and N5 represents the emission of

8,720 tonnes CO<sub>2</sub>e. Although cash payments for 'off-setting' are currently an accepted part of the planning process, it should be noted by the Planning Committee that the effectiveness of carbon offsetting schemes for reducing emissions is largely [discredited](#), and should be avoided at all costs.

### Embodied Carbon

**Ref. clause 25.1** The scheme does not meet current benchmarks for embodied carbon (Modules B-C). The report recommends that this is dealt with by a Section 106 agreement. This is not acceptable as a compliant scheme would have to be physically different to the scheme proposal in order to comply. Planning permission should not be granted until it is demonstrated that the proposal is compliant. That is the point of having these metrics - not to encourage sweeping it under the carpet.

### Demolition of an existing building

Ref. clause 25.17 The case for the demolition of a relatively new building which has an existing use has not been made. It is not acceptable to say "This building is considered low quality in design terms". It was granted permission in 1996 and was thought acceptable then. Planning permission was granted on the basis of conditions "*In order that the Council is satisfied with the detailed design of the development*" and "*To ensure that the Council is satisfied with the visual appearance of the building.*" Although its presence does add constraints to site development this is something that needs to be worked with. We no longer live a world where it is acceptable to knock down any building just because architectural taste has changed, nor for relatively minor improvements to accessibility. There needs to be an alternative scheme developed incorporating the existing building to prove whether the benefits of demolition are justified. It is very unlikely that they will be if the need to address the Climate Emergency is properly taken into account. **The harm resulting from demolition is the high level of GHG emissions resulting from constructing new buildings in its place.**

### Conclusion

Ref. clause 25.21 The report concludes by saying "The proposals exceed the standard benchmarks and comfortably meet the GLA aspirational benchmarks for whole life carbon for residential buildings." This is not a true statement (ref. clause 25.17), and the report needs to be redrafted to provide members with accurate information.

### **Biodiversity**

Climate change is only one of 6 planetary boundaries we are crossing, and "crossing certain biophysical thresholds could have disastrous consequences for humanity." Others include: biosphere integrity; land system change; freshwater change, ozone depletion and ocean acidification.

### Urban Greening

Ref. clause 18.17 The scheme does not provide the Urban Green Factor required by policy. Officers say that "*Considering the size of the site and general statements made about how green it is, the failure to meet the minimum is disappointing*", and go on to say that "*Officers are confident that there are many opportunities available to the applicant to improve the UGF as the details of the scheme are worked up further and to ensure that this policy requirement is met.*"

We do not share this optimism. Developers invariably seek to dilute their greening commitments, rather than the other way round.

### **Conclusion**

- 1) The scheme should not be approved until it is demonstrated that it is fully compliant in relation to the planning policy requirements listed above in respect of GHG emissions and Biodiversity.
- 2) The overall scheme should be reduced in scale to reduce the GHG emissions resulting.
- 3) The O2 Centre should not be demolished, as this is incompatible with the need to mitigate Climate Change.