

# **Camden Local Plan**

## **Proposed Submission Draft 2025**

### **Prioritising the Retention of Existing Buildings**

#### **Topic Paper**

October 2025

# **1. Introduction**

- 1.1 The Camden Local Plan Proposed Submission Draft was published for consultation and engagement from the start of May to the end of June 2025. Following this, the Plan was submitted to the Planning Inspectorate for examination on 3 October 2025.
- 1.2 This topic paper supports Policy CC2 (Prioritising the retention of existing buildings) and seeks to provide an overview of the policy context and relevant evidence, and further background and detail on the approach taken, to demonstrate that it is positively prepared, justified, effective and consistent with national and regional policy.

# **2. Background**

- 2.1 As the highest proportion of carbon emissions are emitted at the beginning of a buildings' development or lifecycle, Policy CC2 seeks to address upfront embodied carbon in the construction of new buildings to help meet the national target of being net zero carbon by 2050. Upfront embodied carbon refers to the greenhouse gas emissions associated with material and construction stages: raw material supply, manufacture, transport and construction of all building elements.
- 2.2 The approach set out in Proposed Submission Draft Local Plan Policy CC2 Prioritising the retention of existing buildings is based on the adopted Local Plan 2017 Policy CC1 Climate change mitigation criteria e and f. These state that the Council will:
  - “e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
  - f. expect all developments to optimise resource efficiency.”
- 2.3 Following the adoption of the Local Plan 2017 it became evident that further guidance was needed to support Policy CC1, to provide a clear framework on how applications proposing demolition should be assessed.
- 2.4 In 2021 the Council adopted an amended version of its Camden Planning Guidance (CPG) Energy efficiency and adaptation supplementary planning document, which included a section on reuse and optimising resource efficiency (Chapter 9).
- 2.5 Since adoption, Policy CC1 has been operating effectively, and has been upheld successfully at appeal on a number of occasions, where it was successfully argued by the Council that the substantial demolition of a building was not justified (see Appendix A).

- 2.6 Furthermore, the policy approach provides a clear and transparent way of showing how development options, informed by a condition and feasibility study, have been considered and / or discounted.
- 2.7 The policy seeks to ensure that unnecessary demolition is avoided and that options to retain as much of an existing building as possible are pursued. It does not constrain or prevent development, as demonstrated by the planning approvals set out in Appendix A.
- 2.8 The review of the Local Plan 2017 has provided an opportunity to review and update Policy CC1 to ensure the approach to the retention of existing buildings in Camden continues to operate effectively. Policy CC2 in the Proposed Submission Draft Plan therefore builds on the approach set out in Policy CC1 of the Local Plan 2017, and incorporates elements from the Council's Camden Planning Guidance where relevant, in addition to providing greater detail on how the Council will consider whether proposals constitute the best use of a site.

### **3. Legislative and Policy Context**

#### **National**

##### **Planning and Compulsory Purchase Act 2004**

- 3.1 The [Planning and Compulsory Purchase Act 2004](#) section 19 states that:
- “1A Development plan documents must (taken as a whole) include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change”.

##### **Climate Change Act 2008**

- 3.2 The [Climate Change Act 2008](#) includes a statutory target of reducing carbon dioxide emissions to at least 100% below 1990 levels by 2050, with interim targets, set through five-yearly carbon budgets. The UK government is legally bound to meet this target.

##### **National Planning Policy Framework (NPPF) 2024**

- 3.3 Paragraph 161 of the NPPF states:
- “The planning system should support the transition to net zero by 2050 and take full account of all climate impacts including overheating, water scarcity, storm and flood risks and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing

resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.”

### **National Design Guide 2021**

- 3.4 The [National Design Guide](#) forms part of the government’s collection of planning practice guidance. The design guide communicates the importance of well-designed places, cutting across themes for good design set out in the NPPF. The parts of the National Design Guide particularly relevant to our draft Policy CC2 (Prioritising the retention of existing buildings) are set out below.

“135. Well-designed places and buildings conserve natural resources including land, water, energy and materials. Their design responds to the impacts of climate change by being energy efficient and minimising carbon emissions to meet net zero by 2050. It identifies measures to achieve:

- mitigation, primarily by reducing greenhouse gas emissions and minimising embodied energy; and
- adaptation to anticipated events, such as rising temperatures and the increasing risk of flooding.”

141. [Well-designed places and buildings] follow the principles of whole life carbon assessment and the circular economy, reducing embodied carbon and waste and maximising reuse and recycling.

143. The selection of materials and the type of construction influence how energy efficient a building or place can be and how much embodied carbon it contains.”

145. A well-designed place is durable and adaptable, so that it works well over time and reduces long-term resource needs. The re-use and adaptation of existing buildings reduces the consumption of resources and contributes to local character and context.”

## **Regional**

### **London Plan 2021**

#### **Policy D3 Optimising site capacity through the design led approach**

- 3.5 “D. Development Proposals should:
- 13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy”.
- 3.6 The supporting text to the policy states:
- “3.3.10 To minimise the use of new materials, the following circular economy principles (see also Figure 3.2) should be taken into account at the start of the design process and, for referable applications or where a lower local threshold

has been established, be set out in a Circular Economy Statement (see Policy SI 7 Reducing waste and supporting the circular economy).

3.3.12 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.”

### **SI7 Reducing waste and supporting the circular economy**

3.7 “A. Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

1) promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible

2) encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products

3) ensure that there is zero biodegradable or recyclable waste to landfill by 2026

4) meet or exceed the municipal waste recycling target of 65 per cent by 2030<sup>163</sup>

5) meet or exceed the targets for each of the following waste and material streams: construction and demolition – 95 per cent reuse/recycling/recovery  
excavation – 95 per cent beneficial use

6) design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

B. Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

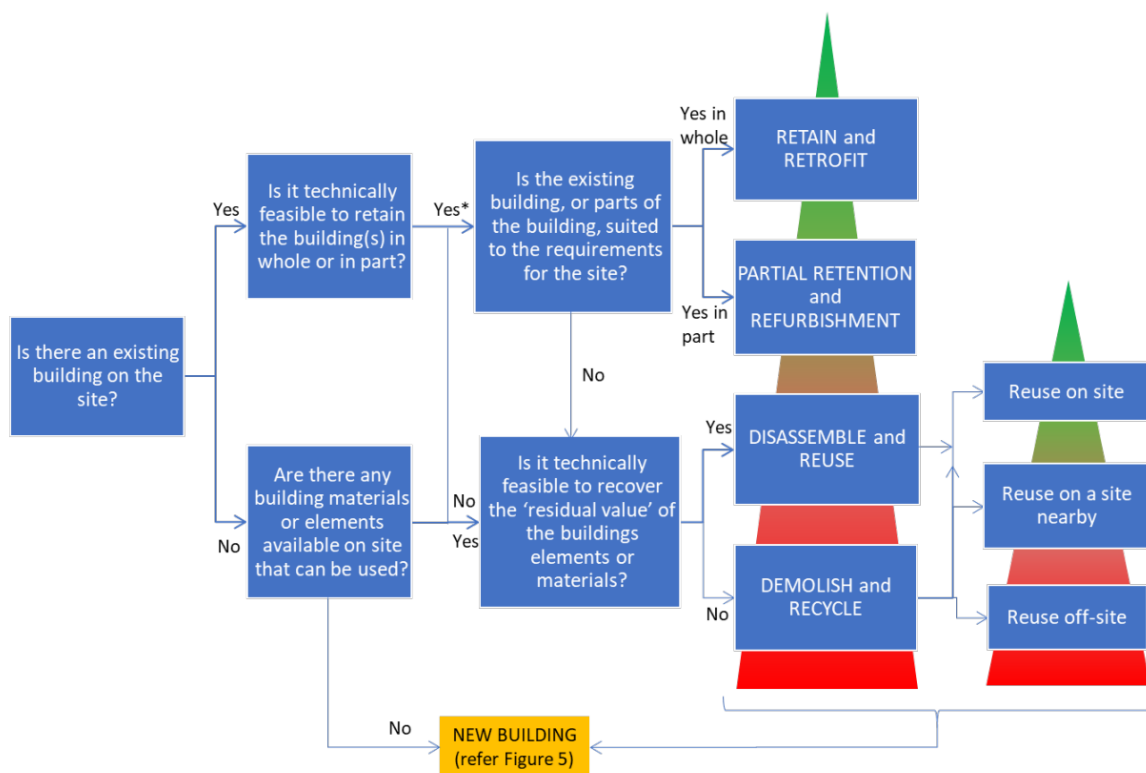
1) how all materials arising from demolition and remediation works will be re-used and/or recycled

2) how the proposal’s design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life....”

## London Planning Guidance (LPG)

### Circular Economy Statement Guidance 2022

- 3.8 The Mayor of London's [Circular Economy Statement Guidance](#) contains a decision tree for design approaches to existing buildings and structures (Figure 4 page 11), which is set out below. This provides for consideration of whether it is technically feasible to retain a building in whole or in part, whether the building is suited to meet the requirements of the site, and suggests development options to be considered. Where it is not possible to reuse the building, as a whole or in part, options for its disassembly following the waste hierarchy are provided. This helps to visualise the process the Council has taken in the draft Local Plan and its adopted Camden Planning Guidance.



### Whole Life-Cycle Carbon Assessments 2022

- 3.9 The Mayor's [Whole Life-Cycle Carbon Assessment](#) guidance states in Table 2.1 - WLC Principles (page 4):

“Retaining existing built structures for reuse and retrofit, in part or as a whole, should be prioritised before considering substantial demolition, as this is typically the lowest-carbon option. Significant retention and reuse of structures also reduces construction costs and can contribute to a smoother planning process.”

- 3.10 The pre-application requirements for Whole Life Carbon assessments include: “Confirmation that options for retaining existing buildings and structures have been fully explored before considering substantial demolition, including incorporating the fabric of existing buildings into the new development” (paragraph 3.1.2 Box 3).

## **Local**

### **Local Plan 2017 Policy CC1 Climate change mitigation**

- 3.11 “The Council will require all development to minimise 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...

- e. require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
- f. expect all developments to optimise resource efficiency.”

### **Camden Planning Guidance – Energy efficiency and adaptation 2021**

- 3.12 Chapter 9 – Reuse and optimising resource efficiency of the Council's [Camden Planning Guidance on Energy Efficiency and adaption](#) states:

“9.4 In assessing the opportunities for retention and refurbishment developers should assess the condition of the existing building and explore future potential of the site. The New London Plan highlights the importance of retaining the value of existing buildings with the least preferable development option of recycling through demolition, although Policy D3 of the New London Plan states the “best use of the land needs to be taken into consideration when deciding whether to retain existing buildings in a development.” The following information in the table below should help to inform decision making prior to the pre-application of a scheme. This should provide a transparent and holistic approach to assessing options that delivers the best outcomes.

#### *Development options*

9.5 Taking into account the condition of the existing building and feasibility of re-use above, the following hierarchy should be used to explore all potential options of an existing site, with the aim of optimising resource efficiency (paragraphs 9.9 - 9.12).

9.6 All options should achieve maximum possible reductions for carbon dioxide emissions and include adaptation measures, in accordance with the Council's Development Plan and this CPG.

- I. Refit
- II. Refurbish
- III. Substantial refurbishment and extension
- IV. Reclaim and recycle

#### *Refit*

This option retains the existing structure as is, includes minor works, and the replacement of building services such as heating and insulation, to continue occupation of the building.

#### *Refurbish*

Refurbishment should seek to significantly improve the service life of the existing building. This option provides an opportunity to retrofit the building to reduce carbon emissions and include sustainable adaptation measures.

#### *Substantial refurbishment and extension*

This option is similar to the above, but takes into consideration the need to optimise site capacity and alter the existing structure to meet future needs. This may involve significant changes to the façade (façade replacement) but should seek to retain as much of the existing building as possible reducing the need to use new materials and reduce the loss of embodied carbon in the existing structure. If this option includes partial reclaim and recycle the development proposal should include a pre-demolition audit, as specified below.

#### *Reclaim and recycle*

Where it is demonstrated to the Council's satisfaction that the above options are not feasible the development proposal should include a pre-demolition audit identifying all materials within the building and documenting how they will be managed. The preference should be for re-use on site, then re-use off site, remanufacture or recycling. (Providing time in the project plan for selective deconstruction techniques and materials storage to maximise reuse). New London Plan policy SI7 expects 95% of construction and demolition waste to be diverted from landfill (reuse, recycle, recovery), and 95% of excavation waste to be put to beneficial use.

At this option a Whole Life Carbon assessment (including embodied carbon) should be submitted, following the GLA draft SPG and including long term carbon factors (as set out in the GLA Whole Life Carbon SPG)."

## **4. Evidence**

### **Bringing embodied carbon upfront - World Green Building Council**

- 4.1 The World Green Building Council, a local-regional-global network to accelerate the sustainable and just transition of the built environment, have produced a paper entitled '[Bringing embodied carbon upfront - Coordinated action for the building and construction sector to tackle embodied carbon](#)'. It notes that:



“Carbon emissions released before the building or infrastructure begins to be used, sometimes called upfront carbon, will be responsible for half of the entire carbon footprint of new construction between now and 2050, threatening to consume a large part of our remaining carbon budget.” (page 7)

- 4.2 The paper identifies key areas of building construction responsible for the largest proportions of upfront embodied carbon as foundations, frames and other forms of superstructure.

### Resource Use - UKGBC

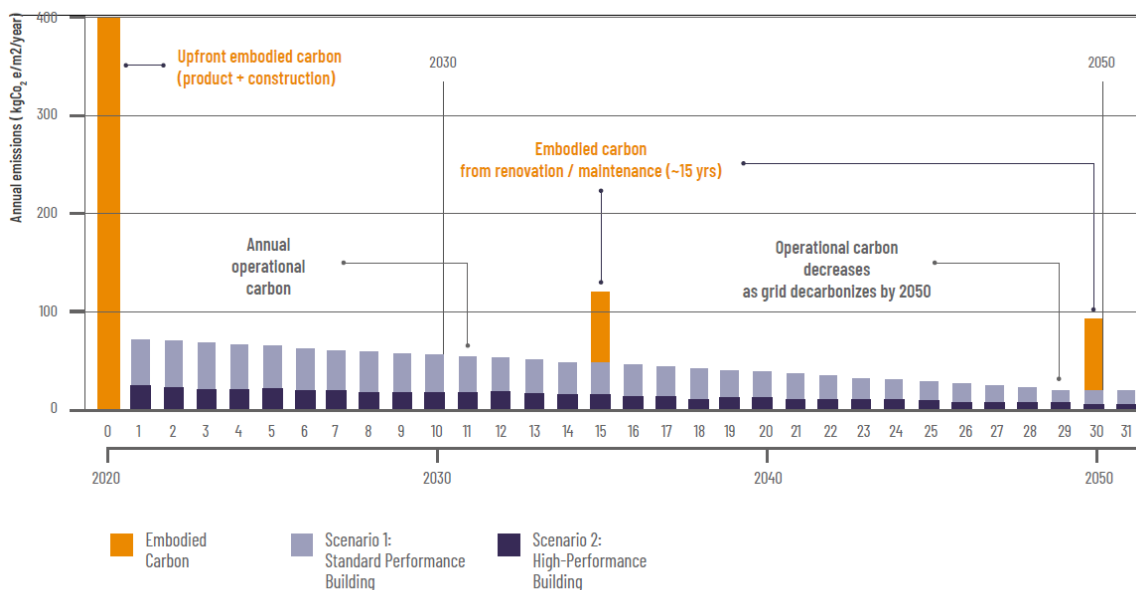
- 4.3 The UKGBC is the membership-led industry network focused on improving the sustainability of the built environment. It is part of the World Green Building Council (WorldGBC) network. Its [Resource Use webpage](#) notes that:

“In the UK, construction, demolition and excavation account for 60% of material use and waste generation. Meanwhile, prices of construction materials in the UK rose by 4.9% between 2017 and 2018. Adopting circular economy principles offers a €1.8 trillion opportunity to the EU between 2015 and 2030.”

### Building materials and the climate: Constructing a new future – UN Environment Programme 2023

- 4.4 The United Nations Environment Programme [Building materials and the climate: Constructing a new future](#) report contains the diagram below which illustrates the embodied and operational emissions over a buildings' lifespan. Unlike operational carbon emissions, which occur gradually, often reducing over time as the energy grid decarbonises, upfront embodied carbon emissions happen more immediately, causing earlier environmental harm.

2.3 Embodied and operational carbon emissions over the building lifespan



Operational carbon will continue to decrease with grid decarbonisation, while embodied carbon is set to remain high without meaningful action.

Adapted from Carbon Leadership Forum 2020.

4.5 The report states that:

“The best way to reduce the embodied emissions of building materials is to avoid major new construction. In a circular economy, where waste is avoided, extending a building’s life is the most valuable and least wasteful option, whereas downcycling is the least valuable option.... Thus, planners should favour the refurbishment and upgrading of existing buildings – using reused materials when possible – to reduce the need for non-renewable material extraction. The lifetimes of buildings can be extended by incentivizing renovations and retrofits over demolition.” (Paragraph 3.3 page 19)

**UKGBC - Insights on how circular economy principles can impact carbon and value**

4.6 The UK Green Building Council [Insights on how circular economy principles can impact carbon and value](#) report sought to increase understanding of circular economy principles. It states:

“The Net Zero Whole Life Carbon Roadmap, published in 2021, demonstrates that the UK built environment can be net zero carbon by 2050. The modelling found that for this to happen, both embodied and operational carbon must be reduced to almost zero, and that the use of circular economy principles are an important part of the solution.”

4.7 The Net Zero WLC Roadmap demonstrates the importance of applying circular principles in order to create a near-zero carbon-built environment by 2050. The Roadmap requires that embodied carbon will form over half of built environment emissions by 2035, that 25,000 new homes per annum will be delivered via change-of-use conversions from 2025, that improved utilisation of existing building stock will create a 10% reduction in new office and residential demand by 2040, and that there will be a 10% reduction in material demand by 2040 due to increased material reuse. These projections are directly related to the use of circular principles in building design.” (Page 10)

“Maximising reuse has a high potential to reduce upfront carbon emissions. All case studies reusing the existing asset and recovering materials on site reduced upfront carbon emissions, while sharing materials for onward reuse resulted in both embodied and operational carbon savings plus waste reduction.” (Page 13)

“Reuse the sub and super structure. These make up approximately 50% of the upfront embodied carbon of a project and is often where the most significant upfront carbon reductions can be made.” (Page 13)

4.8 The paper also features a number of case studies that show how reusing some of the existing building structure significantly reduces the proportion of upfront embodied carbon compared to if it had been completely demolished and rebuilt:

- The Entopia Building: Approximately 285kgCO<sub>2</sub> e/m<sup>2</sup> saved from the reuse of the existing sub and super structure (about 53% of original carbon in the structure was retained). Estimated that the retention of this structure and upgrading to EnerPHit standard saved about 60% embodied carbon compared to demolishing and newbuild.
- Timber Square: Reusing 70% of the original structure, equating to 25% of the new development; saving 7,300tCO<sub>2</sub> in total compared to a completely new frame.
- The Bartlett School of Architecture: 440tCO<sub>2</sub> e saved through reuse of the original structure.
- Cambridge Avenue: Reuse of the steel structure contributed to a 260tCO<sub>2</sub> e saving (80kgCO<sub>2</sub> /m<sup>2</sup>).
- 1 Triton Square: 3,000m<sup>2</sup> of the panelised façade recovered, which resulted in 2,400tCO<sub>2</sub> savings compared to a new façade; 70tCO<sub>2</sub> was saved by refurbishing panels in a factory in Essex rather than in Germany; approximately 10% of the total upfront embodied carbon saving.

## 5. Local Plan approach

- 5.1 Policy CC2 Prioritising the retention of existing buildings seeks to respond to the significant proportion of waste and carbon generated through the demolition and construction of buildings. It recognises the benefits of re-using materials in terms of:
- limiting the carbon emissions associated with the extraction of raw materials;
  - reducing the impact associated with demolition and construction on the local community; and
  - speeding up the delivery of new homes and jobs, through reduced construction times.
- 5.2 The approach set out in the policy will assist with meeting the national target of achieving net zero by 2050.
- 5.3 There is clear evidence that the carbon emissions associated with demolition and construction of buildings are significant. This is a particular issue in a highly developed central London borough like Camden, where almost all development takes place on previously developed sites. Given this, and the climate emergency, it is considered appropriate and necessary to retain and develop the successful approach set out in Policy CC1 of the adopted Local Plan 2017 in relation to the retention and re-use of existing buildings.
- 5.4 Appendix A to this Topic Paper sets out a number of examples (although not an exhaustive list) to demonstrate that approach in the adopted Local Plan 2017 and Camden Planning Guidance on Energy efficiency and adaptation is

working effectively to restrict unnecessary demolition, and increase the reuse of parts of buildings or building materials where substantial demolition is justified.

- 5.5 Policy CC2 in the Proposed Submission Draft Local Plan therefore builds on the approach set out in Policy CC1 of the Local Plan 2017, and incorporates elements from the adopted Camden Planning Guidance where relevant. It also provides greater detail on how the Council will consider whether proposals constitute the best use of a site, when considering proposals involving demolition.
- 5.6 Policy CC2 does not seek to constrain development but ensures that substantial demolition is avoided unless it has been demonstrated to the Council's satisfaction that:
1. there are significant structural issues with the existing building that would prevent it from being retained and improved; or
  2. the developer has comprehensively explored a range of feasible alternative development options, informed by the condition and feasibility assessment, prior to considering substantial demolition, and it has been demonstrated to the Council's satisfaction that the existing building cannot be retained or improved; and
  3. the proposal constitutes the best use of the site (informed by the condition and feasibility assessment and the development options appraisal), and optimises site capacity.
- 5.7 The following sections provide further information on the approach taken in the Local Plan.

### **Options appraisal and consideration of the best use of a site**

- 5.8 Policy CC2 prioritises retention and retrofitting but allows for demolition to take place where the criteria set out above apply. This includes consideration of whether a development proposal involving substantial demolition constitutes the best use of the site. This assesses whether the development makes the most efficient use of Camden's limited land and optimises site capacity, in line with criterion A.3. of Policy DS1 Delivering Healthy and Sustainable Development.
- 5.9 This is informed by a condition and feasibility assessment and development options appraisal. The options appraisal should demonstrate that the options of retention and retrofit; substantial refurbishment and extension; and reclaim and recycle have been fully explored. It should provide justification as to why the preferred option has been selected and why other options that could retain more of the existing building/s have been discounted.

- 5.10 When assessing whether the proposal constitutes the best use of the site the Council will consider:
- the contribution the proposal makes to the delivery of the Local Plan's vision and objectives, and to housing delivery, in particular of affordable housing;
  - public benefits provided by the scheme, including the delivery of social and community infrastructure, open space, active travel measures, affordable workspace, jobs, and estate regeneration;
  - design and layout, and whether the proposal optimises site capacity;
  - the contribution the proposal makes to the local environment.
- 5.11 Where substantial demolition is proposed, developers will be expected to demonstrate that the benefits associated with the proposal are substantially greater than those that could be realised through a retention scheme.
- 5.12 This approach will enable the Council to balance the need to reduce carbon emissions and waste materials against the need to ensure that that development makes the best use of a site and optimises site capacity, making the most efficient use of Camden's limited land.

### **Whole life carbon**

- 5.13 WLC assessments consider the carbon involved in the extraction, transportation, demolition, and construction of a building in addition to the operational carbon associated with the running of a building. They do not however assess the embodied carbon in an existing building structure.
- 5.14 Whilst Whole Life Carbon assessment is considered to be a useful tool in seeking to ensure that the carbon emissions of a development are minimised as much as possible, as the assessment is based on a number of assumptions, it can be open to manipulation.
- 5.15 Given the above, the Council only requires a WLC assessment to be undertaken once the principle of demolition has been accepted. This is in line with the GLAs Whole Life Carbon Guidance.
- 5.16 The approach to Whole Life Carbon assessment in the Local Plan Proposed Submission Draft follows the existing approach that the Council has adopted since 2021, as set out in Camden Planning Guidance on 'Energy efficiency and adaption'.

### **Approach to Policy CC2 and site allocations**

- 5.17 The Local Plan Proposed Submission Draft includes 70 site allocations, the majority of which are allocated to deliver new homes in addition to other uses. Where sites are identified as being suitable for housing, indicative housing

capacities have been included. These have been informed by existing planning permissions, the content of adopted area-based supplementary guidance documents, and design-led capacity assessment, which has been undertaken in line with London Plan guidance and tested policy compliant mixes.

- 5.18 Where site capacity design work has been undertaken a number of development scenarios have been modelled depending on the site context and constraints. Further detail on the site capacity work undertaken to inform the Local Plan is set out in the Council's [Site Selection and Allocation Topic Paper](#).
- 5.19 As set out in paragraph 1.39 of the Local Plan, development schemes proposed for full or substantial demolition on an allocated site where retention has been assumed will still need to demonstrate they comply with Policy CC2, including consideration of whether the specific scheme proposed would constitute the best use of the site. If the demolition proposed is considered acceptable, the development capacity of the site will be agreed as part of the planning application process.
- 5.20 A larger number of homes than the indicative capacity may be supported where it is shown that the proposed quantity is appropriate to the local context taking account of relevant design and heritage policies and can be accommodated without unacceptable harm to the amenity of occupiers and neighbours. A lower number may be supported where this can be justified, having regard to the overall supply of housing in the borough compared with housing needs and demonstrable needs for other land uses (Local Plan paragraph 1.40).

## **6. Conclusion**

- 6.1 Policy CC2 prioritises the retention and retrofitting of existing buildings and ensures that applicants have fully considered the potential of a building and options for retention before proposing demolition. Addressing upfront embodied carbon is essential to achieving short-term climate goals, such as reducing emissions by 2030 and 2050.
- 6.2 The policy approach taken largely continues the effective and established approach to retaining and improving existing buildings set out in Policy CC1 of the adopted Local Plan 2017, and incorporates relevant elements of adopted Camden Planning Guidance.
- 6.3 The policy seeks to ensure that unnecessary demolition is avoided and that options to retain as much of an existing building as possible are pursued. The approach provides a clear and transparent way of demonstrating how development options have been considered. It allows for an assessment of

whether a development constitutes the best use of site, to ensure that developments make the most efficient use of Camden's limited land.

- 6.4 The Council considers that the proposed policy approach set out in Policy CC2 Prioritising the retention of existing buildings provides a positive, effective and justified framework that is consistent with national policy and legislation, and the London Plan, and is therefore sound.

## **Appendix A – Decisions on planning applications involving substantial demolition**

Examples 1, 2 and 3 below provide information on cases where planning applications for substantial demolition have been refused by the Council based upon insufficient information to justify demolition, contrary to Local Plan 2017 Policy CC1 (Climate change mitigation). Examples 2 and 3 were subject to appeal. In both cases the Council's decision was upheld and the appeal dismissed.

Examples 4, 5 and 6 provide information on cases where planning applications involving substantial demolition were granted planning permission by the Council as the schemes sought to optimise the site and deliver significant public benefits which were not capable in other development scenarios.

### **Example 1 - 34A Netherhall Gardens, London NW3 5TP (2024/5731/P)**

Demolition of existing dwellinghouse and erection of three storey replacement house, including excavation of basement. Associated works including replacement of front boundary wall and erection of cycle and waste storage.

**REFUSED**

Reasons

1 The proposed development, through insufficient evidence to justify the demolition of the existing building, would result in an unsustainable development that fails to contribute to a low carbon future through efficient use of resources, contrary to policy CC1 (Climate change mitigation) of the London Borough of Camden Local Plan 2017 and policy SI 7 (Reducing waste and supporting the circular economy) of the London Plan 2021.

2 The proposed development, by reason of its scale, roof form, detailed design, and fenestration pattern, would result in an incongruous and overly dominant building that fails to integrate with the existing street scene and pattern of development, thus failing to preserve or enhance the character and appearance of the application site, neighbouring buildings, and the wider Fitzjohns Netherhall conservation area, contrary to policies D1 (Design) and D2 (Heritage) of the London Borough of Camden Local Plan 2017.

### **Example 2 - 9D The Grove, London N6 6JU (2020/4307/P)**

Demolition of the existing dwelling and construction of a replacement dwelling with associated landscaping.

**REFUSED**

Reasons (not including 'in the absence of a legal agreement'):



1 The proposed demolition, by reason of the loss of the existing building which makes a positive contribution to the Highgate Village Conservation Area, would cause harm to the character and appearance of the conservation area, contrary to policy D2 of the Camden Local Plan 2017 and Policies DH1, DH2, DH7 of the Highgate Neighbourhood Plan 2017.

2 The proposed replacement dwelling, by virtue of its scale, design, materiality and siting, would cause harm to the character and appearance of the street scene and the wider area, and the setting of the neighbouring listed building and would fail to preserve or enhance the character and appearance of the Highgate Village Conservation Area contrary to policies D1 (design) and D2 (heritage) of the Camden Local Plan 2017 and policies DH1, DH2, DH6, DH7, DH8 of the Highgate Neighbourhood Plan 2017 and with the London Plan 2021 and the NPPF 2023.

3 The proposed development, by virtue of insufficient evidence to justify the need for demolition of the existing building nor the use of active cooling, would result in an unsustainable development contrary to policies CC1 (climate change mitigation) and CC2 (adapting to climate change) of the Camden Local Plan 2017 and policies DH7, DH9 of the Highgate Neighbourhood Plan 2017.

The application was subject to an appeal, which was dismissed. The Inspector's report found as follows:

“29. Policy CC1 of the CLP requires all development to minimise the effects of climate change, specifically mandating that all proposals involving substantial demolition demonstrate that it is not possible to retain and improve the existing building. While Policy CC1 does not explicitly call for a condition and feasibility study, it does clearly require justification for why the existing building cannot be retained and improved.

30. Accordingly, even if the conclusions of the WLCA were accepted, they do not address the core requirement of Policy CC1. Although the submission includes other documents, such as the Design & Access Statement and Energy Statement, which compare the proposed development to redesign and retrofit options, the evidence presented does not sufficiently convince me that retaining and improving the existing building is not possible. Therefore, the proposal does not meet the requirements of Policy CC1.”

### **Example 3 - 71 Avenue Road, London NW8 6HP (2022/2529/P)**

Erection of a two storey, single family dwellinghouse (Class C3) with basement and accommodation in the roof space, following the demolition of existing.

REFUSED

Reasons (not including 'in the absence of a legal agreement'):

1 The proposed development, through insufficient evidence to justify the demolition of the existing building, would result in an unsustainable development that fails to contribute to a low carbon future through efficient use of resources, contrary to policy CC1 (climate change mitigation) of the Camden Local Plan 2017, policy SI7 of the London Plan 2021, and the NPPF 2023.

2 The proposed development fails to achieve sufficient carbon savings by minimising embodied carbon through sustainable design decisions, resulting in an unsustainable development contrary to policy CC1 (climate change mitigation) of the Camden Local Plan 2017, policy SI7 of the London Plan 2021, and the NPPF 2023.

The application was subject to an appeal, which was dismissed. The [Inspector's report](#) found as follows:

“22. For the above reasons, I conclude the need to demolish and replace the existing building has not been demonstrated, having regard to resource efficiency and the objective to reduce carbon dioxide emissions. This is contrary to CLP Policy CC1; and to London Plan Policy SI7, which promotes a more circular economy that improves resource efficiency to keep products and materials at their highest use for as long as possible. It is also contrary to the Framework, where it seeks to shape places in ways that contribute to radical reductions in greenhouse gas emissions, and encourages the reuse of existing resources, including the conversion of existing buildings.”

#### **Example 4 - 33 - 35 Jamestown Road, London NW1 7DB (2024/4953/P)**

Demolition of existing buildings and structures to facilitate redevelopment comprising a Purpose Built Student Accommodation (Sui Generis) block over the basement, ground, plus five storeys and sixth-floor plant room with flexible commercial (Class E) on the ground floor and a residential (Class C3) block over the ground plus five storeys. Each block has two private courtyards with hard and soft landscaping, cycle parking, and associated works.

APPROVED

[Extract from committee report](#) “The development complies with local and regional climate and sustainability policies. The demolition of the existing buildings is accepted in this case to allow optimisation of the site, and it is expected that refurbishment is not a viable option to deliver the same public benefits. It incorporates sustainable design measures, including green roofs, high energy efficiency standards, air-source heat pumps (ensuring the development is air quality neutral). The site-wide total carbon reduction is 60.7% over the baseline, with the 39.3% shortfall met through a carbon offset contribution of £49,961. There is a commitment to biodiversity through carefully designed courtyard landscaping and extensive green roofs.”

### **Example 5 - 100 and 100a Chalk Farm Road, London NW1 8EH (2024/0479/P)**

Demolition of existing buildings and redevelopment of the site to provide two new buildings of between 6-12 storeys: one containing affordable homes (Class C3) and one (with three cylindrical volumes) containing purpose-built student accommodation with associated amenity and ancillary space (Sui Generis), a ground floor commercial space (Class E) together with public realm, access, plant installation, and other associated works.

APPROVED

#### Extract from the Committee report:

12.27 “As required by Policy CC1e. the applicant has followed due process in assessing the potential of the existing building as opposed to the demolition and new-build approach proposed within the application. Within these studies, 2 options have explored the retention and extension of the existing site buildings with some in-fill development. Due to the location and form of the existing buildings, limited development is possible before the extension and in-fill has a significant detrimental impact on the surrounding context. The resultant layouts also include highly compromised rooms that would lack good aspect, with a ground floor that doesn’t address the street successfully. To achieve the best outcome for the context whilst optimising the site capacity and delivering high quality living accommodation, it is agreed that a new-build approach is preferable.”

### **Example 6 - O2 Masterplan Site, Finchley Road London NW3 6LU (2022/0528/P)**

Detailed planning permission for Development Plots N3-E, N4, and N5 and Outline planning permission for Development Plots N1, N2, N3, N6, N7, S1 and S8, including demolition of all existing structures and associated works, and redevelopment to include residential development (Class C3), commercial, business and service uses (Class E), local community uses (Class F2), and Sui Generis leisure uses (including cinema and drinking establishments) together with all landscaping, public realm, cycle parking and disabled car parking, highway works and infrastructure within and associated with those Development Plots, in accordance with the Development Specification. For the avoidance of doubt, the Detailed and Outline planning permission are separate and severable for each of the Plots shown on plan P011 and the description of development on any decision notice issued pursuant to the application would reflect that.

APPROVED

#### Extract from the Committee report:

25.17 “In relation to the circular economy, a pre redevelopment audit has been undertaken, design approached and principles considered. The car showrooms and Homebase store buildings cannot be repurposed or reused given their ‘big box’ design. These clearly could not be repurposed for residential use or other uses that would fit in with the proposed scheme. The Builders’ Merchant Yard buildings are similarly not suitable for reuse and also the demolition of these buildings was granted

in a previous planning permission (see 'History'). The O2 Centre is a relatively new building and its demolition is regrettable in sustainability terms. However, as with the above buildings, this building could not suitably be repurposed for residential use, which is the main land use coming forward on the site (in line with the SPD and Neighbourhood Plan). This building is considered low quality in design terms (as discussed in the 'Design' section, and it severely restricts accessibility in to the larger site, with only one road. The replacement scheme with the demolition of the O2 Centre would integrate much better with the Finchley Road Town Centre (as discussed in the 'Land use' section. Paragraphs 124 and 125 of the National Planning Policy Framework state that decisions should support development that makes efficient use of land, taking account of need, viability and local character. The existing O2 Centre does not make efficient use of the land. Its demolition allows a more viable scheme that provides significant housing provision, as well as replacing commercial uses that complement the Town Centre."