

# **London Borough Camden Statement on Matter 9: Climate Change and the Environment**

Please note that where document references are included below, these relate to documents in the Council's examination library which is available to view on the [Council's website](#).

## **Issue 1: Climate Change**

**Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan with regard to climate change.**

### **Questions**

- 1. Is the Plan's approach to climate change consistent with national policy and in general conformity with the London Plan?**
  - 1.1 The Plan's approach to climate change is consistent with national policy and in general conformity with the London Plan.
  - 1.2 Paragraph 8 of the National Planning Policy Framework (ND01) sets out the three overarching objectives of the planning system and states that the environmental objective is to "protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."
  - 1.3 Paragraph 161 of the NPPF then highlights that 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".
  - 1.4 It is considered that the climate change policies in the Local Plan (SD02) follow this holistic approach, specifically:
    - Making effective use of land (Local Plan Policy CC2 through optimising site capacity);

- Using natural resources prudently and minimising waste and pollution (Local Plan Policies CC2, CC3, CC9 in reducing waste and ensuring efficient use of resources);
- Mitigating climate change (Local Plan Policies CC4, CC5, CC6, CC7 by minimising carbon emissions); and
- Adapting to climate change (Local Plan Policies CC5, CC8, CC9, CC10, CC11 by ensuring buildings and environment are more resilient to the effects of a changing climate).

1.5 Chapter 14 of the NPPF 'Meeting the challenge of climate change, flooding and coastal change' also covers the following matters, which are in turn addressed by the Local Plan:

- Paragraph 164 (a) Vulnerability to the impacts of climate change (Local Plan Policies CC1, CC8, CC10, and CC11);
- Paragraph 164 (b) Help to reduce greenhouse gas emissions (Local Plan Policies CC1, CC2, CC3, CC4, CC5, CC6, CC7);
- Paragraph 165 to increase the use and supply of renewable and low carbon energy and heat (Local Plan Policies CC5, CC6, CC7);
- Paragraph 167 support energy efficiency and low carbon heating improvements to existing buildings (Local Plan Policy CC5);
- Paragraph 171 Strategic policies should be informed by a strategic flood risk assessment, and should manage flood risk from all sources (Local Plan Policy CC10);
- Paragraphs 173 – 175 and 181 A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding (Local Plan Policy CC10); and
- Paragraph 182 Applications which could affect drainage on or around the site should incorporate sustainable drainage systems to control flow rates and reduce volumes of runoff (Local Plan Policy CC11).

1.6 Given this it is considered the Plan's approach to climate change is consistent with national policy. Consistency with the Written Ministerial Statement is addressed in the response to Question 6 below and within Topic Paper 'Energy use and the generation of renewable energy' (TP07) paragraph 6.5.

1.7 With regards to the London Plan 2021, the climate change policies in the Local Plan are in general conformity with the London Plan 2021 (RD01) and consistent with associated London Plan guidance. Specifically London Plan policies:

- D3 Optimising site capacity through the design-led approach (Local Plan Policy CC2);
- SI 2 Minimising greenhouse gas emissions (Local Plan Policies CC4, CC5, CC6);
- SI 3 Energy infrastructure (Local Plan Policy CC7);
- SI 4 Managing heat risk (Local Plan Policy CC8);

- SI 5 Water infrastructure (Local Plan Policy CC9);
- SI 7 Reducing waste and supporting the circular economy (Local Plan Policies CC2 and CC3);
- SI 12 Flood risk management (Local Plan Policy CC10); and
- SI 13 Sustainable drainage (Local Plan Policy CC11).

1.8 This is evidenced by Appendix R of the Council’s letter to the Inspector dated the 12 December 2025 (ED03r) and the Statement of Common Ground that the Council has signed with the GLA (SD19).

**2. What is the background to the approach to operational energy performance set out in the Plan and what is the evidence to justify it?**

2.1 Section 19 Preparation of local development documents in the Planning and Compulsory Purchase Act 2004 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”.

2.2 The UK’s national commitment to becoming net zero carbon is set through the Climate Change Act 2008 (as amended by The Climate Change Act 2008 (2050 Target Amendment) Order 2019). The Act sets out the UK’s approach to tackling climate change and legislates that the UK must be net zero carbon by 2050 (which means reducing greenhouse gas emissions by at least 100% of 1990 levels). It also sets a system of carbon budgets to ensure that the UK does not emit more carbon than its allowance.

2.3 The government’s Carbon budget and growth delivery plan report 2025 (ND26) noted measures for enhancing confidence in the planned scenario which include local net zero “Empowering local government and communities to accelerate to net zero, in line with the unique needs and opportunities of each area. Accelerating the adoption and delivery of low-carbon programmes and solutions and fostering innovation specific to local contexts.”

2.4 Furthermore, London Plan 2021 Policy SI2 (Minimising greenhouse gas emissions) states:

“A. Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy”

The Council declared a climate and ecological emergency in 2019. We Make Camden, the Council’s corporate strategy, emphasises the need for the borough to

adapt to meet the climate challenge, address the causes of the climate emergency, and work towards becoming net-zero, while ensuring that we are supporting and protecting the most vulnerable members of our communities from the impacts of climate change.

- 2.5 The approach taken in Local Plan Policy CC6 Energy Use and the Generation of Renewable Energy has been developed in response to legislation and national and regional policy in relation to climate change and carbon emissions, and Camden's local net zero carbon aspirations.
- 2.6 Chapter 2 of the Council's Topic Paper on Energy use and the generation of renewable energy (TP07) sets out the rationale and justification to the approach taken in Local Plan Policy CC6 Energy use and the generation of renewable energy, noting the policy seeks to address the long-term needs of the borough and respond to the challenges faced.
- 2.7 Here, it is considered that the approach taken in Policy CC6 Energy use and the generation of renewable energy, is justified to ensure that the borough is able to:
- Accommodate new development, taking account of grid capacity constraints and the need to ensure that buildings are designed to maximise energy efficiency, and increase the generation of renewable energy (see paragraphs 2.5 to 2.6, and 5.3 to 5.8 of Topic Paper TP07)
  - Strive towards the national, regional and local net zero targets (paragraphs 3.16 to 3.17, and 4.8 to 4.9 of Topic Paper TP07)
  - Reduce the effects of climate change upon lower income households. Fuel poverty has an impact on health with cold homes presenting health risks, particularly to those most vulnerable in society (see paragraphs 2.7 to 2.8, and 5.9 to 5.14 of Topic Paper TP07, and the Camden Climate Action Plan (LD71 and LDD90))
  - Use metrics which are capable of being monitored in line with the London Plan and associated London Plan Guidance (see paragraphs 2.9 to 2.11, 3.14, and 5.23 to 5.24 of Topic Paper TP07).
- 2.8 The approach to operational energy (Energy Use Intensity) for development in Camden will mean that the borough is more capable of understanding future energy demand, an important element for energy infrastructure planning. The data collected uses a simple measure that can be understood by developers, design teams, contractors, residents which shows the effect of design and servicing options on predicted energy use. Total operational energy (Energy Use Intensity) helps to monitor both the expected performance of buildings and in use performance, as it can be directly derived from utility meters or energy bills. This means that the outcomes of the policy can be monitored once the buildings are built and occupied, which builds knowledge and can be used to inform future planning policy.

- 2.9 The evidence that justifies the approach taken in the Local Plan is set out in:
- Delivering net zero: An evidence study to support planning policies which deliver Net Zero Carbon developments (Levitt Bernstein, Introba, Inking, Currie & Brown, Etude), May 2023 (EB15, EB16, EB17); and
  - Decarbonising Camden’s existing buildings: A technical evidence base for planning policy (Etude, Currie & Brown), December 2024 (EB18).
- 2.10 A summary of the findings of the Delivering Net Zero Study (EB17) and Decarbonising Camden’s existing buildings study (EB18) is set out in paragraphs 4.1 to 4.7 of Topic Paper TP07.
- 2.11 Evidence to support the Plan shows that the approach in Policy CC6 should deliver better outcomes in terms of energy efficiency than the current approach to energy reduction, which requires a minimum percentage improvement over Part L Building Regulations. It therefore allows the Council to better achieve its statutory duties, in particular under Section 19 1A of the Planning and Compulsory Purchase Act 2004, and contribute to national and local zero-carbon aspirations.
- 2.12 By ensuring that buildings in Camden are designed to maximise energy efficiency, the policy responds to local grid capacity constraints and allows capacity for growth in Camden’s national important economy. It will help to reduce the effects of climate change on residents with underlying health conditions and to reduce fuel poverty and inequalities the borough. The Policy also secures robust monitoring from developments, in line with the London Plan, which will inform forecasts of future demand on the energy network and aid infrastructure delivery.
- 2.13 Given this the Council considers that the approach taken is justified.

### **3. How will the requirements of Policy CC2 affect the delivery of relevant allocated sites?**

- 3.1 The approach set out in the submitted Local Plan Policy CC2 Prioritising the retention of existing buildings is based on the adopted Local Plan (LD01) 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.”
- 3.2 Since adoption, Local Plan 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 of Topic Paper TP08 Prioritising the retention of existing buildings).

3.3 Furthermore, it is considered that the policy approach set out in Policy CC2 in the submitted Plan provides a clear and transparent way of showing how development options, informed by a condition and feasibility study, have been considered and / or discounted. 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 of Topic Paper TP08 Prioritising the retention of existing buildings and the table provided below in response to question 4.

3.4 Many of the site allocations included in the Plan already benefit from planning permission. Here, schemes involving substantial demolition have been approved on the following sites:

- S5 120 – 136 Camley Street (Granted subject to legal agreement to be signed); S11 Former Royal National Throat, Nose and Ear Hospital;
- S12 Belgrove House;
- S15 Land to the rear of the British Library;
- S16 Former Central St Martins College;
- S17 Selkirk House, 166 High Holborn, 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16a-18 West Central Street;
- S22 6 St Pancras Way; S23 Tybalds Estate;
- C5 369 – 377 Kentish Town Road;
- C7 Morrisons supermarket;
- C9 100 Chalk Farm Road;
- C13 West Kentish Town Estate;
- C22 Heybridge garages, Hadley Street;
- C24 52 - 54 Avenue Road; C26 160 Malden Road.
- W2 O2 Centre, car park, car showrooms and 14 Blackburn Road;
- W4 13 Blackburn Road;
- W10 104A Finchley Road;
- W11 Abbey Co-op Housing site, Emminster and Hinstock.

With schemes involving the retention and improvement of existing buildings approved for:

- S18 135 – 149 Shaftesbury Avenue;
- S26 8 – 10 Southampton Row;
- C21 Grand Union House (part demolition part reuse);
- W13 551 – 557 Finchley Road.

3.5 Where site allocations are yet to be permissioned, then these will be considered against the criteria set out in Policy CC2, where appropriate. Here, it should be noted that Part C.3 of Policy CC2 allows the Council to consider whether the development proposed constitutes the best use of the site, informed by the condition and

feasibility assessment and the development options appraisal. 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.

- 3.6 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 Plans overarching vision and objectives set out in Chapter 1;
  - design and layout;
  - the contribution the proposal makes to overall housing delivery in Camden, and in particular affordable housing delivery;
  - public benefit, including but not limited to, the delivery of social and community infrastructure, open space, active travel measures, affordable workspace, a significant uplift in jobs and estate regeneration;
  - whether the proposal optimises site capacity; and
  - the contribution the proposal makes to the local environment (see paragraph 8.24 of the Local Plan).
- 3.7 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.
- 3.8 Given this, it is not considered that the requirements of Policy CC2 would affect the delivery of relevant allocated sites.

#### **4. What are the implications of Policy CC2 of the viability of development? What evidence is there to support this?**

- 4.1 The Council do not consider that Policy CC2 will have any implications on the viability of development.
- 4.2 As set out above, the approach taken in Policy CC2 Prioritising the retention of existing buildings is based on the adopted Local Plan (LD01) 2017 Policy CC1 Climate change mitigation criteria e and f.
- 4.3 Since adoption, Local Plan 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 of Topic Paper TP08 Prioritising the retention of existing buildings).

4.4 The table below shows the number of schemes (full planning applications) involving both substantial demolition and less than substantial demolition that have been approved or refused since the adoption of the current Local Plan in 2017.

	Major Applications Involving Substantial Demolition		Major Applications Involving Less than Substantial demolition	
	Approved	Refused	Approved	Refused
2017	8	0	3	0
2018	13	1	14	3
2019	5	1	3	1
2020	12	0	3	0
2021	11	0	6	1
2022	9	1	7	0
2023	5	1	7	0
2024	7	0	6	0
2025	7	0	9	2
2026	2	0	1	0

4.5 This demonstrates that the Council’s existing approach to prioritising the retention of existing buildings has not impacted on the viability of development in the borough.

4.6 The approach taken in Policy CC2 is also in line with Policies D3 (Optimising site capacity through the design-led approach), SI7 (Reducing waste and supporting the circular economy (CE)), and SI2 (Minimising greenhouse gas emissions) of the London Plan (RD01) and supported by London Plan Guidance on Circular Economy Statements (RD19) and Whole life-cycle carbon assessment (RD20).

4.7 Here it should be noted that the Mayor’s guidance on Circular Economy Statements (RD19) sets out the process applicants should go through to inform the design approach for an existing building and expects applicants to consider whether the building could be retained and retrofitted or partially retained and refurbished (see Figure 4 of RD19). Whilst the Mayor’s guidance on Whole life-cycle carbon assessment (RD20) states that “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.” (Table 2.1)

4.8 Furthermore, the requirements of Policy CC2 will ensure that the Council has sufficient information when assessing applications involving demolition to balance considerations such as resource efficiency and whether the proposal makes the best use of land.

4.9 It is considered that the requirement for a condition and feasibility study and development options appraisal will establish whether retention is realistically possible

and assess the implications of retaining part or all of a building. This would include consideration of the opportunity cost in terms of both optimising a sites development capacity and scheme viability.

- 4.10 The Council considers that it should not be overly onerous for applicants to demonstrate a case for substantial demolition where it is clear that options which could retain more of an existing building are not feasible. Indeed, this analysis would typically form part of the upfront design-led development process for a site.
- 4.11 In the 2025 Camden Local Plan Viability Study (EB01) undertaken to support the Proposed Submission Draft Local Plan professional fees were increased from 10% to 12% of base build costs to reflect the additional upfront work and reporting that is likely to be required for development proposals in the borough, including the requirements arising from Policies CC2 and CC3.
- 4.12 It should however be noted that the typologies tested in the Viability Study assume demolition and new-build development. This is due to the fact that schemes involving the retention of all or part of an existing structure are inherently site-specific and can vary significantly in their cost and development implications. As a result, they are difficult to model with certainty in an area-wide viability assessment.
- 4.13 Where retention-led schemes are brought forward and additional costs are shown to materially affect viability, then we will expect developers to provide information on viability through an open book approach in line with paragraph 15.30 of the Plan. It is however considered that the policies in the Plan contain appropriate flexibility to address these circumstances through the development management process and are worded to enable scheme viability to be considered on a case-by-case basis where appropriate.

## **5. In Policy CC3, is it clear in what circumstances a Construction Management Plan is required and what should be included?**

- 5.1 Local Plan Policy A1 Protecting Amenity sets out where the submission of a Construction Management Plan (CMP) is required, that is, for major planning applications, with minor applications considered on a case-by-case basis depending on the nature of proposed works.
- 5.2 In addressing the efficient use of resources such as water use on construction sites, paragraph 8.36 in the supporting text to Policy CC3 states: "The construction phase of development can use a large amount of water, contributing to water wastage, and while water is an important part of dust suppression and site cleaning, there are measures that can be taken to reduce the amount of water used. Sites should therefore look to eliminate water waste, as much as possible, and improve the efficiency of any processes involving water use. Where a Construction Management

Plan is required, this matter can be addressed in the Environment subsection of the report.”

- 5.3 For clarity, the following minor modification has been proposed to paragraph 8.36 – “Where a Construction Management Plan is required (see Policy A1 Protecting Amenity), this matter can be addressed in the Environment subsection of the report” (see SD50 Schedule of minor modifications reference NMM11).
- 5.4 Further information on the preparation and content of CMPs is set out in the Council’s Camden Planning Guidance on Amenity (LD19), with a pro-forma and CMP Guidance and Requirements available on the [Council’s website](#).
- 5.5 The Council will review and update the Amenity CPG (LD19) following the adoption of the submitted Plan, to ensure it is aligned with the policies in the new Local Plan. As part of this the Council will update the guidance in the CPG in relation to CMPs, in addition to the pro-forma, to cover on-site water management covering both adequate dust suppression and site cleaning, this could include reuse of water where practicable. The updated CPG will be published for public consultation.

**6. Is Policy CC6 consistent with the parameters set out in the Written Ministerial Statement on Energy Efficiency (December 2023) in terms of:**

**a. the proposed target levels**

- 6.1 The 2023 Written Ministerial Statement states that planning policies which propose local energy efficiency standards for buildings that go beyond current or planned buildings regulations should ensure that the additional requirement is expressed as a percentage uplift of a dwelling’s Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).
- 6.2 Paragraphs 5.15 to 5.28 of Topic Paper TP07 Energy use and the generation of renewable energy provide a detailed justification for the approach taken in Policy CC6 in relation to energy metrics.
- 6.3 The proposed targets in Policy CC6 Part A 2 to A3 are derived from the Delivering Net Zero Study (Levitt Bernstein, Introba, Inkling, Currie & Brown, Etude), May 2023 (EB15, EB16, EB17).
- 6.4 The Delivering Net Zero Study (EB17) tested two main policy options:

**Policy option 1** is based on using the Part L calculation of regulated carbon emissions, which evaluates the performance of a proposed building by comparing its performance to a baseline (i.e. a notional building) and expresses the results as a

percentage improvement over that baseline. This is the approach currently adopted in the Camden Local Plan 2017.

**Policy option 2** is a new approach and involves a policy requiring all new buildings to be designed and built to be Net Zero Carbon in operation, using a measure of Space Heating Demand, low carbon heat, Energy Use Intensity, on site renewable energy generation, assured energy performance, and offsetting as a last resort.

- 6.5 The Study included extensive energy and cost modelling to investigate how different building typologies (Domestic: terraced house, low rise, mid-rise, and high rise. Non-domestic: office, school, industrial, hotel) would perform against the metrics in Policy option 1 and Policy option 2, using different combinations of specifications. Further information on the approach taken to modelling and the specifications tested is set out in the Delivering Net Zero Study (EB17).
- 6.6 The Council assessed both policy options considered by the Delivering Net Zero Study and concluded that policy option 2 was the preferred option for the reasons set out below:
- option 2 ensures that the benefits (or disbenefits) of energy efficient design can be robustly assessed and therefore minimises the risk of inefficient building design. This is intended to drive good practice in sustainable design and construction. This should help deliver more energy efficient buildings, which should lead to lower energy bills for occupiers, helping to reduce fuel poverty, and provide more comfortable and healthy living conditions. Given that Camden has some of the most deprived neighbourhoods in London, this should help to improve the quality of homes in the borough, reduce the proportion of non-decent housing and help to provide a better quality of life for Camden's residents. See paragraphs 5.9 – 5.14 of TP07 for further information.
  - option 2 considers all the energy used in a building (total operational energy), whereas policy option 1 only considers regulated energy. This is important for:
    - understanding future energy use in the borough for infrastructure planning (given pressures on grid capacity in the area, increased energy demand has the potential to constrain the growth of businesses and Camden's economy; as well as impacting on smaller developments; the retrofitting of existing buildings and the increased deployment of electric charge points). See paragraphs 5.3 – 5.8 of TP07 for further information;
    - understanding how buildings are expected to perform, which can influence alterations; and
    - providing a predicted energy usage whereby buildings are able to balance their energy demand with the energy generated by renewable systems (such as rooftop PV).

6.7 The Council therefore considers that the approach taken in Policy CC6 is justified taking account of Camden's specific circumstances and is therefore in line with the WMS.

**b. the robustness of the submitted evidence supporting any proposed uplift**

6.8 The Delivering Net Zero Study (EB17) provides robust evidence to support the approach taken in Policy CC6. It was a collaborative study developed by a group of energy specialists and engineers (Levitt Bernstein, Introba, Inking, Etude) and cost consultants Currie and Brown. 18 London boroughs, including Camden also contributed its development.

6.9 The Study included extensive energy and cost modelling to investigate how different building typologies would perform against the metrics in policy options 1 and 2 (set out above), using different combinations of specifications.

6.10 The study provides construction costs for each combination of specifications compared to a 'cost reference scenario' or 'baseline' selected on the basis that it is Building Regulation Part L 2021 compliant. As part of the study three scenarios were tested 'Business as usual', 'Good practice', and 'Ultra-low energy'. For the low-rise, mid-rise, and high-rise residential typologies the space heating demand figures ranged from 28 - 20kwhr/m<sup>2</sup>/yr and the EUI ranged from 39-22kwhr/m<sup>2</sup>/yr (between less efficient and more efficient heat pumps) for 'Good practice' specification. The cost modelling provides the percentage uplift in cost per meter square. The 'Good Practice' specification for the low-rise, mid-rise, and high-rise typologies ranges from 1.1% to 2.1% using a less efficient heat pump or 2.1% to 4.7% combined with a more efficient heat pump. For the office and hotel typologies the space heating demand figures ranged from 12 - 24kwhr/m<sup>2</sup>/yr and the EUI ranged from 74 – 152kwhr/m<sup>2</sup>/yr for 'Good practice' specification. The cost modelling for the office typology ranged from 0.4% (less efficient heat pump) to 2.7% (more efficient heat pump). The cost modelling for the hotel typology ranged from 0.5% (less efficient heat pump) to 1.6% (more efficient heat pump).

6.11 Further information on the approach taken to modelling and the specifications tested is set out in the Delivering Net Zero Study (EB17).

6.12 In addition to this, the Local Plan Viability Study (EB01) tested the impact of the main policies in the plan, including Policy CC6, and their impact on scheme viability.

6.13 The Viability Study (EB01) notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies in the Plan have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. It is therefore considered that the flexible application

of the Council's policies will allow development to come forward whilst ensuring that where there is a prospect of viability improving prior to, or during, the delivery of the development, that the Council is able to secure the reassessment of viability over the lifetime of the development.

- 6.14 The Council therefore considers that the approach taken in Policy CC6 is consistent with the WMS in terms of the robustness of the submitted evidence supporting the proposed uplift.

### **c. how the proposed targets are expressed within policy**

- 6.15 The Written Ministerial Statement states that planning policies which propose local energy efficiency standards for buildings that go beyond current or planned building regulations should ensure that the additional requirement is expressed as a percentage uplift of a dwelling's Target Emissions Rate (TER) calculated using a specified version of the Standard Assessment Procedure (SAP).
- 6.16 However, having regard to the particular circumstances that apply in Camden, especially the need to maximise grid capacity in order to support the delivery of housing and economic growth, then using a space heating demand and energy use intensity metric is necessary in order to respond to the issue of climate change in the borough, and therefore comply with the Council's statutory duties under Section 19 1A of the Planning and Compulsory Purchase Act 2004.
- 6.17 Space Heating Demand (SHD) is the amount of energy per square metre needed to maintain a comfortable internal temperature in a building over the course of an average year. It is a measure of the thermal efficiency (performance) of building elements. Various design and specification decisions affect space heating demand, including building form and orientation, insulation, air tightness, windows, doors and the type of ventilation system.
- 6.18 The use of Space Heating Demand in the new Local Plan will encourage developers to improve sustainable design and construction, which will reduce the amount of energy needed to heat buildings. As the heat used in future buildings will likely be from low carbon systems, this approach will reduce unnecessary energy need from primary substations, which will contribute to reducing the headroom capacity issues in the borough.
- 6.19 Energy Use Intensity (EUI) is the amount of total energy needed to run a building over a year (per sqm). Using an energy-based metrics approach means there is an initial focus on minimising energy use, which reduces pressure on the electricity grid and mitigates climate change. It is a simple metric that can be understood by developers, design teams, contractors, residents and those managing

housing/building asset portfolios. At the design stage, predictive energy modelling is used to estimate the EUI. This helps inform the design team on how to reduce energy use, giving the ability to consider options to reduce the total energy and carbon emissions of a building.

- 6.20 The Local Plan's approach also aligns with the requirements in the London Plan Guidance on Energy Assessment (RD27), which promotes reporting on Energy Use Intensity and Space Heating Demand for new developments.
- 6.21 In contrast, a policy based on a percentage reduction from the Target Emission Rate (TER) means that the carbon emissions from the actual building must be a certain percentage lower than the notional building regulations compliant building generated by a computer model. This percentage improvement is intangible and cannot be measured post construction.
- 6.22 The Council is also aware of a number of other adopted local plans that include space heating demand and energy metrics that have been found sound by Planning Inspectors following the publication of the WMS. These include the Tendring Colchester Borders Garden Community Development Plan Document 2025, Uttlesford Local Plan 2025, Salt Cross Village Area Action Plan 2026 and, most recently, Winchester Local Plan 2025 (ND27 - 30).
- 6.23 The Inspector for the Salt Cross Village Area Action Plan observed: "I acknowledge that the WMS is a material consideration, but it should also be read in the context of wider national policy and legislative considerations. Reducing carbon emissions and supporting the transition to net zero forms a central part of the Framework in line with the objectives and provisions of the Climate Change Act 2008. However, no matter how energy efficiency is proposed to be measured, the environmental outcome, to mitigate climate change and contribute to meeting the net zero obligation, will remain the same" (paragraph 15 of ND29).
- 6.24 The approach taken in the Local Plan has been to reduce carbon emissions in line with national, regional and local commitments. Although Policy CC6 Energy Reduction and Generation of Renewable Energy does not use the Target Emission Rate (TER), as promoted by the WMS, we consider there is strong local justification for the approach taken and it is therefore sound.
- 6.25 The Council decided to proceed with space heating demand and Energy Use Intensity as these together would drive improvements to sustainable design and construction, to conserve energy and contribute to meeting net zero target ambitions. Using these metrics will help to:
- reduce energy use in existing and new buildings, which should lead to lower energy bills for Camden residents, helping to reduce fuel poverty in the borough;

- provide comfortable and healthy living conditions for occupiers;
- maximise the use of renewable energy and assist with future energy demand and capacity planning; and
- set out robust metrics to effectively measure and report on energy performance.

6.26 The Council therefore considers that the approach taken in Policy CC6 is justified taking account of Camden’s specific circumstances and is therefore in line with the WMS.

**d. the viability implications on future development proposals, including when assessed cumulatively with other development plan policy requirements**

6.27 The Written Ministerial Statement states that planning policies that propose local energy efficiency standards for buildings that go beyond current or planned building regulations should have a well-reasoned and robustly costed rationale to ensure that development remains viable, and that impact on housing supply and affordability is considered in accordance with the National Planning Policy Framework (ND01).

6.28 The Delivering Net Zero study (EB17) commissioned to help inform the approach taken to the delivery of net zero development in the Local Plan included robust cost modelling undertaken by Currie and Brown (see response to question 6b for further information). Paragraphs 5.30 and 5.31 of the Topic Paper Energy use and the generation of renewable energy (TP07) provide an overview of the cost modelling undertaken and how this has shaped the approach taken in the Plan.

6.29 In addition to this, the Local Plan Viability Study (EB01) tested the impact of the main policies in the plan, including Policy CC6, and their impact on scheme viability. Paragraphs 5.32 to 5.36 of the Topic Paper (TP07) provide an overview of the findings of the Viability Study in relation to Policy CC6.

6.30 The Viability Study (EB01) notes that some policies in the Plan will have the potential for an impact on viability. However, in these instances the policies in the Plan have been amended to take into account the findings of the Viability Study to ensure that scheme viability is considered. For example, Policy CC6 Energy use and the generation of Renewable Energy adopts a reasonable cascade mechanism whereby, if “it can be demonstrated to the Council’s satisfaction that it is not feasible for the amount of energy generated in a year through onsite renewable energy production to match the predicted annual energy demand of the building, a payment in lieu will be sought”. The policy goes on to qualify that “The payment in lieu should be related to the scale of the shortfall” and that this will be “subject to viability”.

6.31 It is therefore considered that the flexible application of the Council’s policies will allow development to come forward.

6.32 The Council considers that the approach taken in Policy CC6 has a well-reasoned and robustly costed rationale, taking account of Camden's specific circumstances, and is therefore in line with the WMS.

**e. providing flexibility to respond to the viability findings of individual schemes**

6.33 The Written Ministerial Statement states that local energy efficiency standards should be applied flexibly to decisions on planning applications. Paragraph 5.38 of the Energy Use and generation of renewable energy Topic Paper TP07 sets out changes that have been made to the Plan between Regulation 18 and 19 in response to the Written Ministerial Statement and the findings of the Viability Study of the draft Local Plan (EB48).

6.34 Policy CC6 provides suitable flexibility to respond to the findings of individual schemes in the following ways:

- Policy CC6 Part A.3 states that “For each of the building types set out below (or the nearest equivalent), the Council will expect development to meet the Energy Use Intensity targets set out below, **unless it is demonstrated to the Council's satisfaction that it is not feasible**”
- Policy CC6 Part A.4 states that new buildings should be “Where it can be demonstrated to the Council's satisfaction that it is not feasible for the amount of energy generated in a year through onsite renewable energy production to match the predicted annual energy demand of the building, a payment in lieu will be sought. The payment in lieu should be related to the scale of the shortfall, **subject to viability.**”
- Policy CC6 Part C.2 states that proposals for works to an existing building should “maximise the generation of renewable energy (through solar PV) **where feasible**”
- Policy CC6 Part C.3 states that proposals for works to an existing building should “take measures to reduce the amount of energy needed to heat the building over a year to meet the following space heating demand targets (**unless demonstrated to the Council's satisfaction that it is not feasible**)”
- Policy CC6 Part C.4 states that proposals for works to an existing building should “be designed to use as little total energy as possible, to meet the following Energy Use Intensity targets (**unless demonstrated to the Council's satisfaction that it is not feasible**)”

6.35 It is therefore considered that Policy CC6 contains appropriate flexibility and is worded to enable scheme viability to be considered on a case-by-case basis where appropriate.

## **Monitoring**

### **7. What indicators, baselines and targets will be used to monitor climate change outcomes and what triggers would prompt an early review or policy adjustment?**

7.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.

7.2 The Council has sought to ensure that the policies in the Plan contain appropriate flexibility and are worded to enable 'on balance' judgements. This will help ensure that the Plan's policies remain relevant notwithstanding any changing future circumstances.

7.3 Where monitoring demonstrates that there are significant issues with the delivery of the Plan's climate change objectives, the Council will consider whether any policy adjustments or an early review is appropriate.

## **Modifications**

### **8. Are any amendments necessary for soundness?**

8.1 The Council has proposed a schedule of main modifications (SD51) and a schedule of minor modifications (SD50) to the Camden Local Plan Proposed Submission Draft.

8.2 The Council considers that modifications are required to Policy CC2 Prioritising the retention of existing buildings, Policy CC3 Circular economy and reduction of waste, Policy CC4 Minimising Carbon Emissions, Policy CC9 Water efficiency and Policy CC11 Sustainable drainage for soundness. These modifications are set out in SD51 Schedule of main modifications reference MM55 - MM64.

8.3 Minor modifications (not relating to soundness) are also required to the supporting text of Policy CC2 Prioritising the retention of existing buildings, Policy CC3 Circular economy and reduction of waste, Policy CC5 Sustainability improvements to existing buildings, Policy CC7 Heat Networks, Policy CC8 Overheating and cooling and Policy CC11 Sustainable drainage and these are set out in SD50 Schedule of minor modifications reference NMM07 - NMM20.

## **Issue 2: Environment**

**Whether the Plan is justified, effective and consistent with national policy and in general conformity with the London Plan with regard to the environment.**

**9. Is the Plan's approach to the environment consistent with national policy and in general conformity with the London Plan?**

- 9.1 The Council considers that policies relating to the draft Local Plan's policies on the natural environment are consistent with national policy and in general conformity with the London Plan. Paragraph 187 of the National Planning Policy Framework (NPPF) states planning policies should protect and enhance "sites of biodiversity... in a manner commensurate with their statutory status or identified quality". Draft Policy NE1 does this by identifying the existing network of nature conservation sites that the Council seeks to protect. These sites are shown on the draft Policies Map (SD10) in accordance with NPPF paragraph 192(a). The supporting text to Policy NE1 provides further detail regarding the various types of designation and the potential implications for development proposals. The existing 'hierarchy' of designations in Camden is well established and has been carried forward across multiple iterations of the development plan. The draft Local Plan policies SC3 and NE1 will also protect open spaces, including local green spaces, in line with paragraphs 104 and 106-108 of the NPPF.
- 9.2 Paragraph 187 of the NPPF states that impacts on biodiversity should be minimised and development should help achieve net gains in biodiversity value, including by establishing "coherent ecological networks". Paragraph 193 states that "opportunities to improve biodiversity in and around development should be integrated as part of their design". The Council considers that multiple criteria in Policy NE1 including A. 9 - 12 as well as criteria in Policy NE2 - A. 1, 2 and 4 - 7 will help to achieve these objectives. Policy NE2 references the Council's approach of using a 'mitigation hierarchy' in managing potential impacts on biodiversity. This is consistent with NPPF 193 (a) and gives priority to avoiding harm.
- 9.3 Policy NE2 sets out the need for relevant schemes to undertake baseline ecological assessments, which will help to support objectives in paragraph 192 of the NPPF relating to habitats and species. Policy NE1 A.13 promotes improving access to nature, responding to NPPF paragraph 193 (d). Draft Policy NE3 gives protection to veteran trees in line with NPPF 193 (c).
- 9.4 The Council considers the draft Plan's policies will further the objective of NPPF paragraph 187 (d) and paragraph 188 which emphasise the need to take a strategic approach to "maintaining and enhancing networks of habitat and green infrastructure". A Green Infrastructure Strategy and a Nature Recovery Network are being developed by the Council, with both expected to be published in 2026. Public consultation on a London wide Local Nature Recovery Strategy closed in October 2025. These documents will assist applicants in making informed decisions relating to nature and prioritise where actions are likely to have the greatest benefit.

- 9.5 A number of datasets are already widely used at a London-wide level by the development industry and local amenity groups. These include the Mayor of London's Green Infrastructure Focus Map (RD48) and data sets held by London's environmental records centre - Greenspace Information for Greater London (GiGL)(RD49). The Council has a data sharing agreement with GiGL which means the information about Camden is kept up to date. Draft policy NE2 states that applicants should have regard to "the local ecological context", with the supporting text to this policy and Camden Planning Guidance on Biodiversity (LD22) highlighting the potential information sources. These emerging strategies and data resources will support the development of ecological networks and delivery of net gains in biodiversity. The Council's Nature Conservation Officer also provided input into the draft Local Plan's area policies and site allocations, allowing early identification of sites which may facilitate connections for wildlife or provide 'buffering' for existing designated sites.
- 9.6 London Plan Policy G6 - Biodiversity and access to nature identifies the important role performed by Sites of Importance for Nature Conservation (SINCs). This is reflected by draft Policy NE1. In line with Part B of the London Plan policy, the Council commissioned London Wildlife Trust to undertake a SINC review in 2024 (EB33) resulting in three additional nature conservation sites being identified on the draft Policies Map, and amendments to the boundaries of some sites, which will help ensure these designations will continue to reflect biodiversity value accurately. Paragraph 11.41 of the draft Local Plan refers to the role of the Council's Biodiversity Strategy (LD74) in setting out priorities for nature enhancement and recovery. Page 28 of the Biodiversity Strategy shows areas of deficiency in access to nature, addressing London Plan Policy G6 (B). The Council considers draft Policies NE1 and NE2 will substantively address all of the other criteria in G6 of the London Plan, which themselves closely align with advice set out in Chapter 15 of the NPPF. Further our draft Local Plan nature conservation policies will support the implementation of Policies G1 (A) which seeks to protect and enhance Green Infrastructure, G3 which gives protection to Metropolitan Open Land (MOL) and S1 14 on Waterways – strategic role which identifies The Regent's Canal in Figure 9.6 as part of the capital's 'Blue Ribbon Network.'
- 9.7 Camden also has a number of adopted neighbourhood plans, some of which have identified planning policies to support habitats and species in their areas, including maps of ecological networks.
- 10. To what extent does Policy NE1 adequately reflect the role of gardens in conserving and enhancing Camden's natural environment?**

- 10.1 The approach in draft Policy NE1 seeks to balance the contribution gardens provide for biodiversity, townscape character and amenity whilst providing opportunities for sustainable development, e.g. home extensions which comply with other relevant Local Plan policies. Policy NE1 A.5 states that “To conserve and enhance Camden’s natural environment the Council will: protect non-designated spaces with nature conservation, townscape and amenity value, including gardens, where possible”. The supporting text at paragraph 11.12 clarifies that the Council will seek to resist development that “occupies a disproportionate amount of a garden” (paragraph 11.12). This paragraph also recognises that gardens often support natural habitats and can be an important element of an area’s biodiversity. Draft Policy NE2 A.7 also states the Council will “recognise the biodiversity value offered by gardens and soft landscaping, in contributing to wildlife corridors and providing a ‘stepping stone’ between designated nature conservation sites, avoiding detrimental impacts on the function of an existing/emerging corridor.”
- 10.2 The Council also acknowledges that in many cases, permitted development rights apply meaning that householders can extend their homes and/or erect outbuildings within gardens, subject to limitations, without the need to apply for planning permission. While development proposals provide an opportunity to improve biodiversity, for example through increased planting, ultimately the biodiversity value of gardens in Camden will be dependent on how they are managed by individual households.
- 10.3 Policy NE1 seeks to promote net gains and biodiversity benefits through the planning process. Examples include retaining or reinstating permeable garden borders, retaining permeable surfaces, reducing the impacts of garden buildings, planting new trees and safeguarding, or enhancing, wildlife corridors identified in neighbourhood plans. We consider that the approach reflects the role of gardens in conserving and enhancing Camden’s natural environment, is reasonable and realistic, and accords with NPPF paragraph 193 (d).

**11. Does Policy NE1 identify all the areas that require protection in order to conserve and enhance the natural environment?**

- 11.1 The Council considers that the approach taken is comprehensive and consistent with the NPPF and is in general conformity with the London Plan. The draft policies were reviewed by the Council’s Nature Conservation Officer and have been developed taking into account biodiversity strategies and data for both London and Camden. We have referenced the role of some neighbourhood plans in Camden in mapping local wildlife networks, which form part of the development plan.

11.2 Draft Policy NE1 will address all of the areas in the borough that require protection. The Council has for many years sought to protect Camden's Sites of Importance for Nature Conservation (SINCs) and Local Nature Reserves (LNRs) recognising that these represent the most significant concentrations of habitat and species in a dense urban borough. These are shown as designated open spaces on the Council's draft Policies Map (SD10), and in preparation this draft Local Plan, we have reviewed all of the existing sites (and proposed amendments to boundaries and new sites where appropriate). Designated sites in Camden include land which is publicly and privately owned. Draft Policy NE1 also carries forward protections for Metropolitan Open Land and the Regent's Canal which also are important strategic biodiversity assets for both Camden and London. Many of the designated Local Green Spaces in adopted neighbourhood plans were also identified because of their biodiversity value. Gardens are the main type of non-designated land and the Plan's approach to protecting these is addressed under Question 10 above.

**12. Are the requirements of criterion A.1 of Policy NE2 justified?**

12.1 The Council considers that the approach is justified. It reflects the established approach to managing development schemes in the borough and is in line with paragraph 192 of the NPPF which says that plans should protect and enhance biodiversity and should pursue opportunities for securing measurable net gains for biodiversity. It is a reasonable and proportionate approach recognising that major schemes are likely to have a greater potential impact on biodiversity and ability to deliver on-site enhancement. Requiring major schemes to demonstrate how any adverse impacts on biodiversity can be avoided or mitigated and establish how biodiversity enhancements will be maximised is consistent with the NPPF.

**13. Are the requirements of criterion A.2 of Policy NE2 justified?**

13.1 This is an established approach to managing the impacts of development on biodiversity in Camden (and other boroughs) and is consistent with paragraph 193 a) of the NPPF. Potential impacts can often be avoided through good design and potentially without significant cost, e.g. avoiding excess lighting. In some cases, the Council will request management plans to ensure that areas with nature conservation value are retained and reach their full potential by having effective maintenance arrangements in place.

**14. Should the Policy wording make specific reference to Local Nature Recovery Strategies?**

- 14.1 Reference to Nature Recovery Networks at both the Camden and London wide level are included in supporting text at paragraphs 11.4, 11.25-26, 11.31 and 11.42-43). Nature Recovery Strategies are not referred to in the policy wording as these are emerging documents which are not yet available. The Council considers the approach in the Plan is sound.
- 14.2 Should the Inspector consider that a modification to the policy is however required, then the Council would be happy to suggest proposed wording.

**15. Are the requirements of Policy NE3 effective in protecting existing trees and securing additional trees within the borough?**

- 15.1 The Council considers that the requirements are effective in protecting existing trees and securing additional trees. The approach builds on existing practice in the adopted Camden Local Plan and was reviewed by the Council's tree officers to ensure it fully reflects current practice. The approach is a balanced one, recognising the importance of protecting existing trees, planting new trees (e.g. to improve species diversity) and supporting sustainable development. This is in line with paragraph 136 of the NPPF which states that planning policies should ensure "opportunities are taken to incorporate trees...in developments (such as parks and community orchards), that appropriate measures are in place to secure the long-term maintenance of newly planted trees, and that existing trees are retained wherever possible. The planting of trees, including "tree-lined streets", are likely to be one of the principal ways in which applicants can meet biodiversity enhancement requirements set out in our site allocation policies.
- 15.2 The Council considers that the policy will operate effectively alongside the relevant [TPO legislation](#) and arrangements for protecting trees in conservation areas.
- 15.3 The policy is supported by Camden Planning Guidance on Trees (LD36) which was also developed with input from tree officers in the Planning service.

**16. How is the two for one replacement benchmark in Policy NE3 justified and will it be effective?**

- 16.1 The Council considers that the approach is justified and effective. Policy NE3 provides a benchmark to guide new development rather than setting out a fixed requirement. Where a two for one replacement is appropriate, this should result in a net benefit to Camden's tree canopy and help to compensate for the loss of any mature and healthy trees. A policy paper prepared by The Woodland Trust: Emergency Tree Plan for the UK advocates the use of minimum replacement

planting ratios (for trees outside of woodland) as a means of achieving increases in the tree canopy. The Guidance suggests using a 3:1 ratio while the adopted Tower Hamlets Local Plan 2031 recommends (in paragraph 14.25) “Due to the environmental importance of trees, at least a ‘one-for-one’ replacement rate is required for any trees affected by a development”. We consider that a 2:1 ratio is a reasonable benchmark for Camden, and is likely to be achievable for many residential-led schemes.

16.2 Planting of a greater number of trees would be supported where these form part of a satisfactory landscaping scheme / planting plan. Too high a standard could result in applicants trying to cram too many trees / smaller trees onto a site, with less desirable outcomes and could inappropriately hinder development.

**17. What indicators, baselines and targets will be used to monitor natural environment outcomes and what triggers would prompt an early review or policy adjustment?**

17.1 The Local Plan Monitoring Indicators document (SD15) sets out the indicators that the Council will use to monitor the delivery of the Plan.

17.2 The Council has sought to ensure that the policies in the Plan contain appropriate flexibility and are worded to enable 'on balance' judgements. This will help ensure that the Plan's policies remain relevant notwithstanding any changing future circumstances.

17.3 The Council will monitor natural environment outcomes as per the indicators in SD15. Where monitoring demonstrates that there are significant issues with the delivery of the Plan's natural environment objectives, the Council will consider whether any policy adjustments or an early review is appropriate.

**18. Are any amendments required for soundness?**

18.1 The Council has proposed a schedule of main modifications (SD51) and a schedule of minor modifications (SD50) to the Camden Local Plan Proposed Submission Draft.

18.2 The Council has proposed modifications to Policy NE3 Tree planting and protection. These are set out SD51 Schedule of main modifications reference MM66.

18.3 Minor modifications (not relating to soundness) are also required to Policy NE1 The natural environment and Policy NE2 Biodiversity and these are set out in SD50 Schedule of minor modifications reference NMM26 – NMM29.