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BY EMAIL ONLY - CamdenLPPO2025@outlook.com

Pauline Butcher
C/O Camden Council
Town Hall
Judd Street
WC1H 9JE

13 March 2026

Dear Pauline

**EXAMINATION OF THE CAMDEN LOCAL PLAN
HEARING STATEMENT: MATTER 9 – CLIMATE CHANGE AND THE ENVIRONMENT
ROK PLANNING ON BEHALF OF UNITE GROUP PLC**

I write on behalf of the applicant, Unite Group Plc (Unite), to submit a Hearing Statement in response to the questions raised by the Inspector (K Ford) concerning the Examination of the Camden Local Plan.

The follows representations made on behalf of Unite to previous stages of the Local Plan's preparation:

- Camden Regulation 18 Consultation – dated 13th March 2024
- Camden Regulation 19 Consultation – dated 27th June 2025.

Introduction

Unite Students is the UK's largest owner, manager, and developer of purpose-built student accommodation (PBSA). With more than 143 properties in 22 leading university towns and cities, Unite Students is home to around 64,000 students, living predominantly in en-suite study bedrooms with rents covering bills, insurance, and 24-hour security.

Driven by a common purpose: to provide a 'Home for Success' to live, work and invest, Unite Students is committed to raising standards in the student accommodation sector with the support of over 60 university partners.

Founded in 1991 in Bristol, the Unite Group is an award-winning Real Estate Investment Trust (REIT), listed on the London Stock Exchange. For more information, visit Unite Group's corporate website www.unitegroup.com or the Unite Students' site www.unitestudents.com.

Following on from the representations submitted to the Regulation 19 Consultation, dated 27th June 2025 and hereafter referred to as 'Reg 19 reps', this Statement focuses on Matter 9 – Climate Change and the Environment and specifically the 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”

This includes questions from the Inspector relating to policies CC2, CC3, CC4, CC6 and CC7 as set out in the Inspector’s Matters, Issues and Questions (document reference ED04).

Matter 9: Issue 1 – Questions 1 to 6

1. Is the Plan’s approach to climate change consistent with national policy and in general conformity with the London Plan?

In general terms, the direction of travel within the climate change policies is understood and broadly aligns with the wider London policy framework, particularly in relation to whole life carbon assessment, circular economy principles and improving operational energy performance.

That said, there are a few areas where Unite argue policies CC2, CC3, CC4, CC6 and CC7 would benefit from clarification to ensure they remain proportionate and workable in practice. These policies are addressed in turn below:

Policy CC2

With regards to Policy CC2 (Prioritising the retention of existing buildings), Unite support the principle of encouraging retention as this consistent with wider policy direction.

However, the policy should not operate as an effective presumption against demolition. The most sustainable outcome is not always achieved through retention alone. In some circumstances redevelopment can deliver significantly improved operational performance, more efficient use of land and greater housing or student accommodation delivery.

Whilst the Council’s proposed modification clarifies that a development options appraisal will not be required where structural issues are identified, the policy remains framed primarily around structural failure. In practice there are a wider range of situations where retention may not represent the most sustainable or deliverable solution, including constraints relating to servicing, floor to floor heights, building configuration, operational performance and overall site optimisation.

As such, Unite request that the wording of the policy is softened / greater flexibility is included, particularly in Part C, which acknowledges the varying reasons why redevelopment may provide the most efficient option.



Policy CC3

Turning to Policy CC3 (Circular economy and reduction of waste), Unite support the overall intent of the policy.

However, Unite argue that it is important that Circular Economy Statements remain proportionate to the stage of design at which planning applications are typically submitted. At early design stages detailed information on material sourcing, reuse opportunities and supply chains is often not yet available. In practice these matters tend to be resolved during detailed design and construction stages.

The policy would therefore benefit from recognising that Circular Economy Statements at planning stage should establish a framework for future decision making rather than requiring a level of technical detail that is often not available at that point.

Policy CC4

In relation to Policy CC4 (Minimising carbon emissions), Unite support the principle of a whole life carbon assessment and note that the proposed modification requiring post-construction reporting aligns with the direction established through the London Plan.

Despite this, Unite would like to highlight that many current whole life carbon benchmarks are derived primarily from commercial or conventional residential typologies. PBSA has a different operational and servicing profile, with relatively high domestic hot water demand and more intensive building services associated with communal spaces.

Consequently, Unite recommend that the policy is amended to recognise that benchmarks and assessment methodologies should be applied with appropriate regard to different building typologies.

Policy CC6

Unite's most significant area of concern relates to Policy CC6 (Energy use and the generation of renewable energy) and the proposed Energy Use Intensity targets.

The use of EUI targets is generally supported as they provide a clear and measurable indicator of operational building performance and help address the recognised gap between modelled and actual energy use. However, the targets currently proposed appear very challenging for certain building types, particularly student accommodation, and may not fully reflect the operational characteristics of those buildings.

Student accommodation typically has higher domestic hot water loads, communal kitchen use and ventilation demand than conventional residential buildings, which can materially influence operational energy intensity.

Unite therefore request that these targets are reviewed to ensure they are grounded in realistic modelling assumptions, for example through TM54 analysis or alignment with emerging frameworks such as the UK Net Zero Carbon Buildings Standard.

Unite also argue that operational performance in student accommodation should be considered not only on a floor area basis but also on a per bed basis. This would better reflect the operational characteristics of these buildings and avoid penalising schemes that include larger communal or amenity areas.

Policy CC7

Finally, for Policy CC7 (Heat networks), Unite broadly support the policy direction as connection to low carbon heat networks where feasible is consistent with London Plan policy.

Nevertheless, the policy should retain flexibility for developments to demonstrate through whole life carbon analysis where alternative building level solutions may represent a lower carbon option, particularly where existing networks may still rely on higher carbon heat sources.

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?

Please refer to Unite's comments under Policy CC6 in response to Question 1 above which addresses operational energy in PBSA developments. In summary, Unite argue that the targets used appears very challenging for certain building types, including PBSA, failing to reflect the operational characteristics of those buildings. Unite therefore request that these targets are reviewed to ensure they are grounded in realistic modelling assumptions for all building types including PBSA.

Unite also argue that operational performance in student accommodation should also be considered on a per bed basis to avoid penalising schemes that include larger communal or amenity areas.

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

No comment.

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

Referring back to the comments under Policy CC2 in our response to Question 1 above, retention is not always the most sustainable or efficient option. Instead, redevelopment can often make a more efficient use of land therefore resulting in a greater delivery of housing or PBSA and in turn a greater income from the development. Redevelopment can also deliver significantly improved operational performance, thereby reducing operational costs,



As such, prioritising retention over redevelopment is likely to result in fewer developments being viable and deliverable.

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

No comment.

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**
- b. the robustness of the submitted evidence supporting any proposed uplift**
- c. how the proposed targets are expressed within policy**
- d. the viability implications on future development proposals, including when assessed cumulatively with other development plan policy requirements**
- e. providing flexibility to respond to the viability findings of individual schemes**

Whilst the principle of operational energy targets is broadly supported because it moves the conversation closer to actual building performance, Unite argue that there are two main issues with Policy CC6 in relation to the Written Ministerial Statement (WMS):

1. First is the metric itself. Policy CC6 sets operational energy caps using total Energy Use Intensity expressed in kWh/m²/yr. That includes both regulated and unregulated energy use. The difficulty is that national policy and regulation do not currently operate on that basis. Building Regulations and the Future Homes Standard deal with regulated energy only, and there is no national methodology that sets compliance targets for total operational energy demand.

This becomes particularly problematic for PBSA. Student accommodation operates very differently from conventional residential buildings. A significant proportion of energy demand comes from unregulated loads such as cooking, appliances, laundry and other small power. These loads scale with the number of occupants rather than the floor area of the building. PBSA schemes are typically far higher density than standard residential buildings, so using a floor area based EUI metric will inevitably produce higher kWh/m² values regardless of how efficient the building fabric and services actually are. A large part of that energy use is also driven by student behaviour and therefore sits outside the control of the developer.

2. The second issue is the evidence base behind the target levels. The policy requires PBSA to achieve a total EUI of 35 kWh/m²/yr. That figure is significantly below the levels typically observed for high density student accommodation and appears to have been derived from residential benchmarks rather than PBSA specific evidence. As explained in the point above, the residential target cannot simply be applied to PBSA too as the typologies can vary in terms of density. In

reality the operational profile is quite different, particularly in terms of domestic hot water demand and communal facilities.

The WMS is clear that where local authorities introduce standards that go beyond national regulatory requirements those standards need to be robustly evidenced and viability tested. In this case, the Delivery Net Zero Carbon report in Camden's evidence base (document EB17) provides no clear evidence that the proposed PBSA target has been tested against realistic operational assumptions or considered in the context of cumulative policy requirements.

There is also a practical point around enforceability. Because the metric includes unregulated energy use, compliance would ultimately depend on occupant behaviour rather than building design. That makes it very difficult to control through the planning system.

In summary, the issue is that the metric and benchmarks need to reflect the operational characteristics of different building types and Unite therefore recommend that the policy wording is updated on this basis.

Summary

Overall, the policy framework is broadly supported by Unite. However, some relatively minor refinements to wording and flexibility would help ensure policies CC2, CC3, CC4, CC6 and CC7 remain clear, proportionate and deliverable in practice.

A summary of the recommended modifications to the policy wording is provided at **Appendix 1**.

Unite reserve the right to further their comments via participation in the Matter 9 Hearing as part of the Examination in Public starting in May 2026.

I trust this Statement is in order and look forward to confirmation of safe receipt. If you require further clarification or wish to discuss this further, please do not hesitate to contact either Erlina Hale [REDACTED], Immie North [REDACTED] or myself at this office.

Yours Sincerely,

[REDACTED]

Matthew Roe
Director
ROK Planning Ltd

[REDACTED]
[REDACTED]



APPENDIX 1

Policy CC2 Prioritising the retention of existing buildings

- A. The Council will expect developers to prioritise the retention and improvement of existing buildings over demolition **where this is feasible and would deliver a sustainable efficient and viable use of the site.**
- B. Developers considering the substantial demolition of existing buildings will be expected to undertake the following assessments, before progressing detailed proposals for submission:
1. a condition and feasibility assessment, which should be undertaken at the earliest opportunity; and
 2. development options appraisal, which should use the findings of the condition and feasibility assessment to explore feasible development options for the site. The options appraisal 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.
- C. The Council will only permit proposals which include substantial demolition where it can be 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;
 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;
 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.
- D. Where less than substantial demolition is proposed, developers will be expected to demonstrate to the Council's satisfaction that the proportion of the building being demolished has been reduced as far as possible, in accordance with the waste hierarchy and circular economy principles set out in Policy CC3 (Circular Economy and Reduction of Waste).
- E. Where it is demonstrated to the Council's satisfaction that the demolition of all or part of an existing building is justified, the developer will be required to submit a pre-demolition audit and demonstrate that circular economy principles have been applied in accordance with Policy CC3 (Circular Economy and Reduction of Waste).

Policy CC3 Circular economy and reduction of waste

- A. The Council will seek to ensure that developments minimise waste, use resources efficiently, and are designed to facilitate easy maintenance, adaptability of use and deconstruction for future re-use.
- B. Development will be expected to:
1. reduce waste through the application of the waste hierarchy (Prevention, Prepare for reuse, Recycling, Other recovery, Disposal);
 2. minimise the amount of materials used;
 3. use materials with a low embodied carbon content;
 4. ensure any dismantled materials are sorted and utilised on-site wherever practicable; and
 5. reduce water use during demolition and construction, whilst effectively mitigating air quality impacts.
- C. The Council will require applications for new build major development and major development which involves substantial demolition and rebuild to submit a Circular Economy Statement, **which sets out a framework for future decision making**.
- D. Where a Circular Economy Statement is required (as set out in (C) above), developers will be encouraged to explore opportunities to use the site, or other local sites, for the temporary storage of reusable materials, during the construction phase to enable other developments in the locality to use those materials.
- E. The Council will continue to safeguard Camden's existing waste site at Regis Road in accordance with the North London Waste Plan.

Policy CC4 Minimising carbon emissions

- A. The Council will seek to ensure that development proposals minimise carbon emissions over the lifespan of buildings and actively reduce embodied carbon.

- B. The Council will require developers for all new build major development and all development proposing substantial demolition to submit a Whole Life Cycle Carbon (WLC) emissions assessment. This should be submitted as part of the planning application and demonstrate:
 - 1. that carbon emissions over the lifespan of the building meet the GLA's aspirational WLC benchmarks **or other appropriate typology specific benchmarks by the nature of the development**. Where a developer can demonstrate to the Council's satisfaction that this is not feasible, the Council will expect the development to meet GLA WLC standard benchmarks as a minimum; and

 - 2. what action has been taken to reduce upfront embodied carbon in the development.

Policy CC6 Energy use and the generation of renewable energy

New build construction

- A. The Council will expect all new buildings, and developments where some existing built fabric is retained, to:
1. be fossil fuel free (that is, not connected to the gas grid), be ultra-low energy, use low carbon heat (such as heat pumps), and maximise the generation of renewable energy (through solar PV) on-site;
 2. be designed to use as little energy as possible to heat them. Developers should achieve a space heating demand of 20 or less kWh/m² GIA/yr (kilowatt hour per square metre of gross internal area per year);
 3. minimise total energy use. 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:
 - a. residential buildings - 35 kWh/m²GIA/yr;
 - b. offices, Retail, Higher Education Teaching facilities, GP surgeries - 70 kWh/m² GIA/year;
 - c. **student accommodation**, care homes, extra care homes - 35 kWh/m² GIA/year;
 - d. **student accommodation – XX kWh/m² GIA/year [a new target which has been tested and is feasible for and reflects the operational characteristics of PBSA];**
 - e. hotels - 160 kWh/m² GIA/year;
 - f. light industrial units - 35 kWh/m² GIA/year; and
 - g. schools - 65 kWh/m² GIA/year.
 4. be designed and built to achieve an energy balance of net zero carbon in operation. **We encourage developers to should ensure that renewable energy generation on site (through solar PV) is maximised in relation to matches, or is in excess of,** the total energy use of the building (Energy Use Intensity). 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, **and where other mechanisms such as the purchase of traceable renewable energy backed up by appropriate energy attribute certificates or carbon credits cannot be utilised**, a payment in lieu will be sought. The payment in lieu should be related to the scale of the shortfall, subject to viability.
- B. The total energy use and renewable energy generation of major developments should be monitored for the first 5 years of occupation in accordance with London Plan Policy SI2 (Minimising Greenhouse Gas Emissions).

Existing buildings

- C. The Council will expect proposals for works to an existing building that includes the provision of 500sqm or more of additional or reprovided floorspace, or creates one or more additional home, to:
1. be fossil fuel free and use low carbon heat;
 2. maximise the generation of renewable energy (through solar PV) where feasible;
 3. 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):
 - a. 105 kWh/m²/year for residential conversions;
 - b. 85 kWh/m²/year for homes created by upward extension; and
 - c. 60 kWh/m²/year for non-residential development;
 4. 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):
 - a. 70 kWh/m²/year for residential; and
 - b. 115 kWh/m²/year for non-residential.

All buildings

- D. Non-residential development that provides 500sqm or more of additional or reprovided floorspace will be expected to achieve a minimum of 'Excellent' in BREEAM non-domestic refurbishment.
- E. Developments covered by Part A and Part C of this policy will be required to demonstrate that a development will deliver all the expectations of this policy through the submission of an Energy Statement.

Policy CC7 Heat Networks

- A. Major developments will be expected to utilise energy from heat networks, or be designed and constructed to be able to connect to a heat network, where **this is technically, commercially and environmentally** feasible, **and where connection represents the lowest whole life carbon option**. The Council will:
1. expect major development to comply with the London Plan policy on Energy infrastructure and refer to the related GLA Energy Assessment guidance for heat networks and utilising secondary heat sources; and
 2. expect major development to prioritise connection to a low carbon heat network **where this can be demonstrated to deliver lower whole life carbon emissions than alternative building-level solution**.