

Applicant Response Regarding Policy LP22

Subject: RE: ROSE OF YORK | BREEAM Rating

See our (energy consultation) response (in green) to the planners comments (in black) below. We believe that the below explains the in-use carbon performance demonstrated and that this is justified by the significant embodied carbon savings and conservation benefits of upgrading the existing building.

“Sustainability

Policy LP22 sets out that developments are required to achieve the highest standards of sustainable design and construction.

However, the proposal fails to meet the BREEAM Excellent and 35% CO2 reduction requirements.

Although it isn't specifically stated in the Local Plan policy 22 I believe this 35% target only applies to newbuild non-domestic in the same way as is stated for residential. The non-residential policy goes on to state “in line with the London plan” which is clear the 35% is for newbuild only. 35% reduction over the Part L target for newbuild would not be a realistic target for a mostly renovation project. The significant extension to modern standards means that the targets for existing buildings would be largely meaningless and passed with ease.

BREEAM Excellent is not a feasible target for this development. There is too much extension for the development to be assessed under the refurbishment version of BREEAM but when assessing a development with this much existing building a lot of the credits under the BREEAM version for Newbuild not feasible – most importantly four credits under the Energy1 section of BREEAM are mandatory to achieve Excellent and these are assessed by comparing the proposal against newbuild standards using similar methodology to Part L – thus are not achievable where a large portion of the development is renovation.

It is noted that a ‘Very Good’ rating can be achieved under BREEAM, however only a 12% CO2 reduction is proposed which is of concern,

It is our belief that 12% is a significant achievement for a mostly renovation project especially given conservation constraints also applicable and that that hotel type uses tend to struggle under the assessment methodology in any case (due to the amount of domestic scale hot water use the methodology assumes but gives no options to mitigate.)

particularly given that new build areas would be expected to meet or exceed the standards set out in this policy.

The newbuild extensions share circulation space and services and some fabric is shared with the existing building making separate assessments unfeasible. Also, the services, design and detailing have to be focused on the renovation aspects which make up the significant majority of the building so cannot be optimised for newbuild. Therefore, the newbuild extension areas cannot achieve the same standards as full newbuild projects.

Additional review of the design to achieve better sustainability as required by Policy LP22 and associated updated documentation should be provided. Alternatively additional

justification will be required as the BTM (Building of Townscape Merit) and CA status, while recognised as a potential constraint is not considered to justify the entire shortfall. This is because an offset payment should only be considered once the maximum sustainability efforts have been achieved on site. “

The developer has committed to the extensions work meeting the part L notional standards for newbuilds. An additional review of all the values will be undertaken at detailed design stage to see if they can be improved without compromising structural or conservation performance, this is expected to achieve significant improvements over this at detailed design stage. However any improvements which can be made will not have the impact we would usually hope for as the extension is already by far the best performing part of the project leading to diminishing returns for improvements as heat “seeks” to leave via the less insulated older parts of the building.

Regards
Owen

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