

## BREEAM Email

**From:** Joe Cunnane <[REDACTED]>  
**Sent:** 31 October 2022 12:20  
**To:** Griffee, Sarah  
**Subject:** FW: ROSE OF YORK | BREEAM Rating

Sarah  
 See below our consultants response

Kind regards.

**Joe Cunnane**  
 Senior Partner



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**From:** [REDACTED]  
**Sent:** 28 October 2022 15:48  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**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

Sent from [Mail](#) for Windows

**From:** [REDACTED]

**Sent:** 17 October 2022 12:37

**To:** [REDACTED]

**Cc:** [REDACTED]

**Subject:** RE: ROSE OF YORK | BREEAM Rating

Hi.

I've drafted a response and circulated to other technical colleagues for checks. We discussed on the phone the arguments for not achieving BREEAM Excellent and these remain true. However they haven't specifically stated that the BREEAM rating is a problem so it would be wise for us to not bring it up. Their complaint seems to be about the % carbon reduction demonstrated by the BRUKL energy modeling.

I've put together a number of reasons why the 35% they mention is not realistically achievable in this case. However I believe it would make it easier for them to justify dropping their concerns if we could look again at the insulation values of the newbuild extensions. Looking back at our previous report we used the notional values (at the time) for Part L which are pretty poor.

Regards  
Owen

**From:** [Redacted]  
**Sent:** Thursday, October 13, 2022 4:12:45 PM  
**To:** [Redacted]  
**Cc:** [Redacted]  
**Subject:** ROSE OF YORK | BREEAM Rating

Dear Owen

Further to your recent discussions with Gerard Wynne and to his e-mail to us (below), please see below three paragraphs outlining the LPA requirements for BREEAM:

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

*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 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. “*

Could you please write a couple of paragraphs to explain why we cannot achieve BREEAM Excellent. We will then present this to the Planning Officer as our reason why we cannot achieve Excellent.

We would be very grateful if you could let us have this information by early next week as we would like to make the submission then.

Thank you very much.

Kind regards.

**Christine Seymour**  
Office Manager



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**From:** [REDACTED]  
**Sent:** 12 October 2022 13:41  
**To:** [REDACTED]  
**Cc:** [REDACTED]  
**Subject:** ROSE OF YORK | BREEAM Rating  
**Importance:** High

Joe

I have now spoken with Owen Thomas in respect of the planners' aspirations for an 'Excellent' as opposed to 'Very Good' BREEAM Rating.

There would appear to be a fundamental problem in achieving the Council's desired rating which largely relates to the fact that the building fabric for the purposes of BREEAM is treated as a new building with the existing retained buildings lumped in with the new build elements. Whilst Owen can re-run the energy efficiency calculations, he cannot achieve enough credits to get us to 'Excellent' due to the construction of the fabric of the existing building.

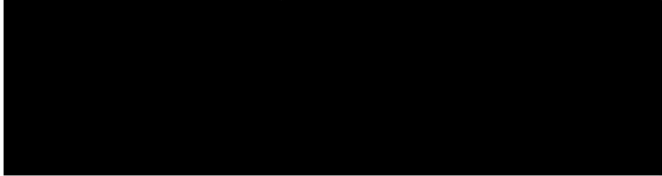
It may well be worth speaking with Owen who can hopefully set out for the planners the reasoning why it is not possible to achieve the Council's desired rating due to the constraints of the retained sections of building.

Kind regards

Gerard

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