

Note accompanying carbon report

From: Tom Ashley <tashley@turnberryuk.com>

Subject: PP/23/00968 81-103 King's Road, LONDON, SW3

Date: September 29, 2023 at 5:32:17 PM GMT+1

To: "Lomas, Martin: RBKC" <Martin.Lomas@rbkc.gov.uk>

Dear Martin,

I write on behalf of Smith Street Residents Association (SSRA) in respect of application PP/23/00968.

You will be aware that SSRA made further representation, dated 28th July 2023, in respect of the revised application submission. In these further representation concerns were raised concerning carbon emissions.

It is also noted that a further submission was made by the application on 6th September which included significant additional information, notably an updated Detailed Circular Economy Statement which included significant additional technical information in the appendices.

Comparative Assessment

In response to this further information SSRA instructed sustainability specialists Quinn Ross to prepare a robust Whole Life Carbon Assessment (attached) for a retention and refurbishment of the existing building. This was to act as a comparison for the proposed scheme.

The attached assessment demonstrates the demolition & new-build proposal will, according to their submitted GLA spreadsheet, accumulate 50,334 tonnes of CO₂ in the building's life cycle. A refurbishment of the existing building, no extensions, will amass 31,882 tonnes of CO₂ in the building's life cycle, a reduction of -18,452 tonnes (-37%) of CO₂ of a 60-year life cycle.

This robustly demonstrates a significant additional carbon impact arising from the proposed scheme when compared to retention and refurbishment.

Peer Review - Assessment Inconsistencies & Inaccuracies

In addition, Quinn Ross identified a number of inconsistencies in the submitted assessments, of particular note are the following:

- Ramboll Embodied Carbon Assessment
- - **CO₂ figures do not appear aligned:** The carbon emissions stated

in the embodied carbon analysis don't appear to match the figures stated in the submitted GLA spreadsheet. The report states the entire development will produce 16,100 tonnes of embodied CO2 over its life cycle, which is very low for a development of this size, yet the GLA excel tool states 50,334 tonnes will be produced.

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- **Re-use and recycling rate is very high:** The Rambol embodied carbon report does not outline re-use and recycle rate of existing materials at all. The submitted GLA excel states nearly all waste materials are labelled as being re-used and/or recycled, with a particularly high quantity of re-use. Although theoretically feasible no other evidence has been provided as to how this is intended to be achieved, which is commonly asked for by GLA assessments
- Ramboll Detailed Circular Economy Statement
- - **Redevelopment Option Assessment includes unfeasibly high re-use %:** Table 9 claims targets for re-use, however a 33% re-use for the substructure, 66% re-use for internal finishes and 36% re-use for MEP services is very high. No evidence is provided outlining how these targets will be met which is a GLA requirement.
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 - **Redevelopment Option Assessment includes unfeasibly long service life:** Page 6, 4th paragraph, claims the service life of the proposed will be 120 years. This is unfeasibly long for a steel frame building and the BRE stipulate that a 60-year service life is the maximum period for life cycle analysis.
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Taken together the assessment inconsistencies and inaccuracies significantly undermine the robustness of the submitted assessments and undermine the conclusions concerning the carbon impact of the redevelopment of the building.

It is acknowledged that Policy SI2 (or SI7) of the London Plan does not prohibit demolition but does requires priority consideration to be given to retention and retrofit. It is acknowledged that the applicants have made reference to several issues which would make retention and refurbishment of the building a less appropriate and more difficult option. It is understood that Officers have taken these issues into account and weighed them against the carbon impacts of demolition.

However, given the inconsistencies and inaccuracies that have been identified in the submitted information, SSRA suggests that , in weighing the costs and

benefits of redeveloping the building as opposed to refurbishment, it is likely that the Council has given too little weight to the cost of redevelopment in terms of carbon impacts, which have been understated.

I would be obliged if you would confirm that the contents of this email will be brought to the attention of the Planning Committee. I shall upload this email via your website.

Best regards

Tom

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