

**From:** Aron Bennett

**Sent:** 12 August 2023 22:20

**To:** Planning

**Cc:** David Fowler

**Subject:** Re: Objection (refs: 2023/2510/P and 2023/2652/L)

To Whom it May Concern,

Please accept this mail as a formal objection to the proposed redevelopment Selkirk House (refs: 2023/2510/P and 2023/2652/L).

The development, whether or not one ultimately approves in principle, is, by the GLA's own standards and commitments, a direct contradiction to the government's Heat and Buildings Strategy on decarbonizing buildings and the formal adoption of policy by the Mayor of London based on Part L 2021. The GLA guidance lays out very clearly that any applicant must demonstrate how the net zero target will be met by committing, as a bare minimum, to a 35 per cent on-site carbon reduction. It goes on to say, quite crucially, that this is "to be met separately for residential and non-residential elements of the development". So that whilst the Energy Assessment prepared by Scotch Partners suggests that the cumulative CO2 output for the site is met to the tune of 46% (a figure which I have to question – see below), by their own admission, the proposal does NOT fully comply with standards laid out by the GLA (this, despite Labs Selkirk House Ltd's alleged enthusiastic adoption of net zero).

The Non Domestic New Build falls considerably short of 35% CO2 reduction at only 22%. This is the difference of almost 10 tonnes of CO2 per year more than we should otherwise have expected. This is very concerning indeed.

The performance against the reduction targets laid out by the GLA, as submitted in the Energy Assessment, are as follows (with some revised calculations which I feel better reflects the true compliance situation with GLA guidance):

Domestic Refurbishment (16.3 tonnes CO2 saving per year at 82%); Domestic New build (26.4 tonnes CO2 saving per year at 77%); Non-Domestic Refurb (1.4 tonnes at 42%); Non-Domestic New Build (15.6 tonnes - which falls below 35% minimum – at 22%). This equates to a total 59.7 tonnes saved. The authors try to show that despite the haemorrhaging of savings on the non-domestic part

(i.e. 24.85 tonnes vs 15.6 tonnes) that the loss still exceeds the standards laid out by the GLA as an overall reduction. Notwithstanding the policy breach, this is simply not true. As the authors of the environment report rightly point out, the guidance does not apply to refurbishments; such that they should therefore not count in the calculations... A more honest calculation would look something like: 26.4 tonnes under Domestic New Build (minimum at 35% would have been 11.97 tonnes) + 15.6 tonnes under Non-Domestic New Build (minimum at 35% should have been 24.85 tonnes). The total percentage reduction works out very differently to the overall 46% that Scotch Partners state on page 9 of the report; it's actually only 39.6%.

It is both frustrating and disappointing that we are being lied to about the true environmental impact and overall compliance of the proposed development. Whether one agrees with the aims of the development or not, the issues and anomalies above are more than grounds to halt the proposal if only to comply with standards and expectations already committed to in the form of London-wide policy on net zero by the GLA.

I understand that numerous experts in the field have reminded the Council of their own advocacy of retrofitting wherever possible, which I am to understand is also possible in this case. Therefore I strongly urge that all interested parties and stakeholders strongly consider this as the right and proper course of action to take and will hold compliancy as seriously as residents and concerned advocates for the environment alike.

Yours Faithfully,

Aron Bennett  
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