Addendum 01

1. 1 Museum Street – Selkirk House Retention & Redevelopment Options Review and WLC Comparison

P00 | 20/09/2023

1 Museum Street – Selkirk House Retention & Redevelopment Options Review and WLC Comparison Addendum

This addendum has been prepared by Scotch Partners LLP in response to the following reviews:

1. Hilson Moran 3rd Party Review

This addendum is to be read in conjunction with the following documents:

1. One Museum Street – Selkirk House Retention & Redevelopment Options Review & WLC Comparison

Clarifications

This section outlines the clarifications required from the respective reviews for the Retention & Redevelopment Options report.

Retention & Redevelopment Options Report comments

This section outlines all responses and clarifications following the Hilson Moran 3rd Party Review. Each is referenced against the relevant comment number.

| Comment number | Reviewer Comment | Applicant resp | onse | | | | |
|-------------------|---|---|--|--------------------|------------------|--|--------------------|
| 1 | Pre-construction demolition impacts The optioneering study produced by the applicant states (paragraph): Pre-construction demolition has not been included as part of this assessment, as per RICS Guidelines. | Correction - Note, demolition impacts have been included in the WLCA for application scheme. Due to the level of detail available these were not assessed option. However, demolition impacts have now been assessed and are reported both the GLA and RICS figures are presented to be consistent across the options. | | | | the planning against each below. Note, | |
| | | Option 1 | Option 2 | Option 3 | Option 4 | Option | 5 |
| | The first edition of the RICS PS on Whole Life Carbon assessments does not require an evaluation of the carbon impacts associated | Total Whole I | .ife Carbon (N | Iodules A-C) as | previously r | eported (tCC | D ₂ e) |
| | with the demolition of the existing buildings, but the latest GLA | 26,930 | 29,512 | 32,426 | 44,097 | 46,097 | |
| | guidance for WLCA does. | Estimated ext | tent of demoli | tion (m²) | | | |
| | Regardless of what RICS or GLA might require (the purpose of the optioneering study is not to produce a carbon output that is RICS/GLA compliant) pre-construction demolition impacts are deemed to be a useful element for the comparison. This is particularly valid for projects like Selkirk House where the considered development options involve significantly different extents of retention/demolition and the carbon emissions associated with the works. | 7,016 | 8,293 | 11,288 | 18,152 | 19,159 | |
| | | Additional demolition impacts utilising GLA factor of $50kgCO_2e$ per m ² demolished area (tCO ₂ e) | | | | | |
| | | 351 | 415 | 564 | 908 | 958 | |
| | | Total Whole Life Carbon (Modules A-C) including demolition impact utilising GLA factors (tCO ₂ e) | | | | | |
| | | 27,281 | 29,927 | 32,990 | 45,005 | 47,055 | |
| | We recommend amending the optioneering report with the inclusion of the carbon impacts arising from pre-construction demolition in the relevant clause "5.10 Carbon Assessment". | Additional de demolished a | emolition impa rea (tCO ₂ e) | acts utilising RI | CS factor of | f 3.4kgCO ₂ e | per m ² |
| | | 24 | 28 | 38 | 62 | 65 | |
| | We note that the same recommendation was raised to the applicant as part of our independent review of the previous planning application (2021/2954/P) for the same site. | Total Whole utilising RICS | Life Carbon factors (tCO2e | (Modules A-C |) including | demolition | impact |
| | | 26,954 | 29,540 | 32,464 | 44,159 | 46,162 | |
| | | It is our view that conclusions of this | the inclusion of sreport. | these is not mater | rial to the resu | ults and does n | ot change the |

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| 2 | 2 Operational carbon emissions (B6-B7) All development options included in the optioneering study show very similar levels of operational carbon emissions associated with energy (B6) and water (B7) use. Options with higher retention of existing structure (1-3) stand at 485 kgCO2e/m2GIA, while Option 4 and 5 are slightly better performing, achieving 478 kgCO2e/m2GIA. | Clarification - results based as simplified s direct the read | We would clar on a quantitati napshot howe der to the detai | ify as follows: ⁻ ve or qualitativ ver the report il in the report | The matrix is pr re assessment a conclusions ar and to the deta | ovided as a hig as appropriate. e based on the iled conclusion | h level overview of the The matrix is provided e detailed analysis. We s. |
| | | We note though that the relatively narrow range of performance is explained in part by the Part L assessment used and we would in practice expect to see a greater difference between the new build and refurbished options as the design and modelling progress. | | | | | |
| The overa between t by the fac | The overall figures seem sensible and the minimal difference between the results of the various options (around 1.5%) is justified by the fact that all options involve either a recladding of the existing building or a new facede, and a full MEP services renewal. It is | Water use and | l energy intens | ities: | | | |
| | therefore reasonable that the various options are able achieve very similar energy performance. | Option 1 | Option 2 | Option 3 | Option 4 | Option 5 | |
| | | Energy Use Intensity (kWh/m ² .annum) | | | | | |
| | | 59.3 | 59.3 | 59.3 | 59.1 | 59.1 | |
| | For the reasons above, we suggest reviewing the representation of the results in the table in the executive summary of the optioneering study (page 11). | Water Use Intensity (m ³ /m ² .annum) | | | | | |
| | | 1.33 | 1.32 | 1.32 | 1.26 | 1.26 | |
| | The use of different colours (green for options 4-5, and amber for options 1-3) without accompanying results can be misleading and convey the message that the energy performance of options 4-5 is considerably better than others, when the numbers actually demonstrate that all the options are comparable. | | | | | | |
| | We also suggest reporting the estimated Energy Use Intensities (kWh/m2/year) and Water Use Intensities (m3/m2/year) for each option to enable further transparency | | | | | | |

| Comment number | Reviewer Comment | Applicant response |
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| 3 | Operational carbon emissions (B6) - Assumptions and key inputs The performance seems reasonable in most cases, however there are some clarifications that should be provided. Section 5.1 states 'This study has followed the RICS professional statement: Whole Life Carbon Assessment (WLCA) for the Built Environment, released in 2017.' | Clarification - Part L has been used for consistency of assessment as detailed energy modelling is not available for options 1-3 due to the feasibility level consideration of these compared to the detailed analysis of the proposed scheme. Correction - There is a typo in the headers for table 2.1, which should state that a consistent set of assumptions were utilised for Options 1-3 and a second set for Option 4 & 5. This is what is set out in the text in section 5.10, which is correct. |
| | It should be noted that RICS WLC PS does require that B6 carbon emissions are based on Part L plus unregulated loads, such as lifts, safety, security and communication installations, ICT equipment, cooking appliances, specialist equipment, etc. Have these additional loads been considered? The emissions presented for the options comparison are based on Part L compliance methodology which would promote optimistic performance and lower carbon emissions than reality, but a consistent approach has been adopted for all options which could be deemed reasonable. However elsewhere in the report there seems to be conflicting messages about the data and sources of it (see Key Variations between report versions 1 (Feb 2023) and version 2 (this version). The text in section 5.10 does not seem to match the information provided in table 2.1. The text alludes to the fact there are changes to services and fabric with a different solution for options 1-3 however table 2.1 shows VRF for Option 1 and ambient loop with fan coil units of options 2-5. It is also not clear why options 2-5 do not have the same operational emissions (kgCO2e/m2GIA) given the report is stating the inputs are the same. It is recommended the applicant clarifies this and expands on the reason for different services strategies and consistency in reporting and the methodology used for each option to enable fair comparison. | A different set of assumptions (fabric and services) were utilised for the retention led schemes for three primary reasons: The spatial constrains for the retention schemes, specifically lack of roof space and constrained heights and risers will drive plant selection and configuration that will be inherently less efficient than the new build options. The space delivered by the retention led schemes will attract lower rents than the new-build scenarios, which would affect viability and thereby impose greater constraints on the budget for refurbishment. The assumptions used in the retention options reflect a set of performance criteria considered by the team to be achievable within a lower £/ft2 budget but still achieve the performance The differing scale of the various schemes was considered likely to have an impact on the preferred services strategies, with for example VRF systems being more likely to be utilised for a smaller development As noted in comment 2 above at this level of detail the results indicate that the energy performance of the different scenarios expressed on a kgCO2e/m2 GIA basis is relatively comparable with the enhanced proposals for Options 4 & 5 only resulting in a modest overall improvement in predicted energy performance when utilising the Part L methodology. Also as noted above, we expect in practice for the new build options to perform better (relative to the refurbishment options) than the modelling suggests. |

| Comment | Reviewer Comment | Applicant response |
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| 4 | Operational carbon emissions (B6) - Fabric In terms of fabric performance presented, a bit more detail relating to the differences and reasons should be provided. All options require recladding of existing structures, further reasoning for differentiation in performance values across options is therefore needed (e.g. u-value, g-value and air tightness). As noted in previous finding 3, the narrative around the option parameters and performance is also confusing. It is also noted in option 1 the residential units would be new build. | Clarification - Please refer to the response to item 3 above regarding the reasoning for selection of alternative performance parameters. We are seeking to reflect the different scale, viability, budget and quality that would need to be reflected in the brief for each of these options. The residential units for Options 1-3 utilise the performance of the proposed Vine Lane scheme applied pro-rata to the floor area, recognising that this would be new-build in all options. |
| | Clarification in relation to the differential of performance should be provided. | |
| 5 | Operational carbon emissions (B6) – Lighting | Clarification - Please refer to the response to item 3 above regarding the reasoning for selection of alternative performance parameters. |
| | Lighting efficacy in option 1 is presented at 110 lm/w and in the other options as 140 lm/w; these are above the average set out in Part L for non-domestic buildings of 95 lm/w, however there is no clear reason for the difference in efficiency between the option presented. | Lux levels in spaces have been set at NCM defaults for consistency with only luminaire efficacies altered as set out in the report. Cost is the driving factor for selection of more or less efficient fittings. |
| | Providing W/m2 and lux levels in spaces would be a better metric for evaluation. | |
| | Reasons for the different lighting assumptions should be provided. | |

| Comment | Reviewer Comment | Applicant response |
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| 6 | Operational carbon emissions (B6) – HVAC Systems For HVAC systems the text in section 5.10 does not seem to match with the data in table 2.1 making it difficult to evaluate consistency in results in terms of carbon output. | Clarification - As noted in the response to item 3 above, there is a typo in the headers for table 2.1, which should state that a consistent set of assumptions were utilised for Options 1-3 and a second set for Option 4 & 5. This is what is set out in the text in section 5.10, which is correct. A detailed assessment of alternative systems has not been carried out for Options 1-3, the performance parameters provided are our professional assessment of what would be a typical set |
| | There is no clear data on which system option is best, but this is challenging to undertake in stage 2. A detailed evaluation of energy performance and systems has not been undertaken. Further clarifications should be provided to enable consistency | of proposals for a scheme of this nature. |
| 7 | Operational carbon emissions (B6) – Standards / Targets | Clarification - Achieving the high levels of operational energy efficiency required to achieve a |
| | Specific energy in use targets or estimated energy use intensities have not been provided. NABERS 5* is mentioned for the selected scheme; it is not clear if this is landlord energy or whole building. Section 5.8 seems to dismiss NABERS for options 1-3 saying 'it would be extremely challenging to meet' without clear justification. Whilst a full review would not be required for all options at this stage, achievable targets and level of performance should be stated. | NABERS 5* rating would inherently be more challenging on a retention led scheme where there is no opportunity to influence the operational energy demand through manipulation of form, orientation, storey heights etc. We have not stated (nor do we believe) that it would be impossible, however we believe it is reasonable to state that it would be more challenging than with a new build scheme without these constraints. It is generally recognised NABERS 5* is challenging to achieve even for a new build scheme. Stats from NABERS UK website indicate total 46 new builds registered compared to 26 refurbishment projects, with average target star rating lower for refurbishment schemes. Given the target occupiers for a small floorplate refurbishment scheme and the likelihood of a low NABERS score it is considered unlikely that the scheme would be submitted for this. |
| | Please clarify why NABERS or BREEAM could not be achieved for options 1-3? | BREEAM Excellent could be targeted for Options 1-3 however it is considered that we could not |
| | There is no evidence to back up this statement. | assume BREEAM Outstanding is achievable, where Options 4-5 it is considered achievable at this stage of the design. Option 4 (and therefore Option 5) has a baseline score of 78% with a potential for 90% shown on the pre-assessments based on the Stage 2. In our experience, it is less common to achieve BREEAM Outstanding on a refurbishment due to the limitations of existing fabric and general design as well constraints due to the development economics. |

| Comment number | Reviewer Comment | Applicant response |
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| 8 | Additional scenarios (future extensive refurbishments and tenancy Cat B fit out) The optioneering study includes an estimate of the carbon impacts arising from future extensive refurbishments and tenant's fit out (pages 85-86) for each option. As transparently outlined in the report, Camden officers should acknowledge that data sources to inform such estimates and existing guidance for assessment are very limited at present. As such, the carbon estimates shown at pages 85-86 of the 'Retention & Redevelopment Options Review & WLC Comparison' report are characterised by a high level of subjectivity. | Noted - following feedback from the review of the previous version the introductory text for this section states "This section includes scenarios that are not accounted for in the scope of a RICS Whole Life Carbon assessment, but are considered relevant when comparing the development options. This includes future major refurbishment cycles and works related to a Cat B Fit Out. These are presented as potential scenarios based on industry insight and available data. We believe these represent valid additional considerations when assessing the approach to development of this site. However it is acknowledged that data sources to inform such analysis and existing guidance for assessment are limited. Therefore this analysis is provided as supplementary to that following the RICS methodology". |
| | The applicant assumed a predicted tenancy of 5 years for options 1- 3 compared to an average tenancy of 10 years for options 4 and 5. In essence, the report assumes that the quality of the space delivered with the new-build options can double the average duration of the tenancy lease. It is understood and accepted that a better quality of space and associated facilities can encourage future tenants to stay longer, but the quality of the rented space is just one of the possible factors that can influence the average length of a lease. The assumptions made by the applicant seem too advantageous for the new-build scenarios | |

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| 9 | Alternative uses for the site | Clarification - the brief referred to is the Development Brief set out on in para 1.4. This has been established the site based on policy, commercial and ESG considerations. |
| Camden's maximise This recom | Camden's CPG guidance suggests exploring different uses to maximise reuse opportunities for existing buildings. This recommendation does not appear to have been implemented. | Commentary has been provided on alternative uses within the <i>Retention and Redevelopment Options and Whole Life Carbon comparison</i> report. However due the large number of variables associated with different land uses it was considered to extremely difficult to draw useful |
| | The optioneering study includes only options for a commercially led development of Selkirk House. In this respect, the report states: | comparisons across different uses. |
| earlier proposals for the site - while in previous ownership - have explored alternative uses, such as a hotel. However residential or hotel in Selkirk House did not meet the wider brief requirements. | Note -Queries from HM, GLA and LBC have been accumulated together for responses in the <i>Clarifications and responses on demolition justification including Pre-redevelopment Audit and retention options appraisal</i> document appended to the Circular Economy Statement This document brings together information from the planning submission and further clarifications | |
| | It is not clear which brief requirements are being referred to. Either those from the Client or those | including addressing further the assessment of other uses for the site. |
| d | dictated by Camden? Clarification is required on this issue. | |
| | The report also adds: the issues affecting the existing building and their implications (chapter 4.0) and analysis (chapter 5.0) apply equally, though in different degrees, to any alternative repurposing of the building for residential or hotel use. | |
| | This last statement is not accompanied by sufficient supporting arg uments. | |
| | Theoretically, an existing hotel could have a greater chance of being reused if maintained in its current use. A possible conversion into residential use could help resolve, or at least mitigate, some of the issues that prevent a successful transformation of the existing building into a modern office building (e.g. low floor-to-ceiling heights, existing upper floor's structural grid). | |
| | It is understood and accepted that some of the issues of the existing site, as outlined in the optioneering study (4.2 and 4.3) will require substantial interventions, regardless of the proposed use at the upper floors. In other words, an alternative use won't solve all existing site issues. | |

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| 10 | Existing building services, thermal performance and energy efficiency | Clarification - Limited assessment of the existing building services equipment has been carried out. The equipment is bespoke to the previous user (Travelodge) who removed any elements they considered to be of value upon their lease expiring. |
| | Camden's CPG guidance require applicants to examine the condition of existing building services, estimate their remaining lifespan and weigh the pros/cons of upgrading. The assessment should also include an examination of the existing thermal performance and energy efficiency. | Given the proposed redevelopment scope presented in all options (i.e. minimum of major refurbishment with renewal of the building fabric), retention of existing building services would necessitate decommissioning and storage prior to re-use in all cases. Anything considered for reuse could therefore be considered to apply equally to all options and thus is not considered likely to have a meaningful difference to the comparative performance of the various options. |
| | The optioneering study do not respond to the above requirements. | It should also be noted that |
| | All options presented assume a full MEP renewal, albeit with differing solutions . Whilst this could be a sensible approach, appropriate supporting arguments should be provided. A description of existing building services is not provided, except for the configuration of existing lift provision (described as not suitable to meet current commercial standards). Information relating to the thermal performance and energy efficiency of the existing Selkirk House is not provided. | The last major refurbishment of Selkirk House was undertaken in 2002, and therefore the majority of the existing building services systems are reaching or beyond the end of their economic lives. The existing fit-out is for hotel use, the requirements of which differ substantially to that of office use The existing building has now been vacant for over 3 years meaning that the condition of the existing services is likely very poor. |
| | Further clarity should be provided by the applicant. | Note - Queries from HM, GLA and LBC have been accumulated together for responses in the <i>Clarifications and responses on demolition justification including Pre-redevelopment Audit and retention options appraisal</i> document appended to the Circular Economy Statement. This document brings together information from the planning submission and further clarifications including providing information on the numerous surveys and investigations carried out on the existing buildings to inform the optioneering. |

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| 13 | Material inventory and embodied carbon of existing buildings In assessing the condition of the existing building, the applicant should include a quantification of existing materials (material inventory) and an estimate of the associated embodied carbon, in accordance with Camden's CPG policy requirements. A Pre-Demolition Audit (PDA) has been undertaken by ARUP. A draft of the PDA report is attached to the Circular Economy Statement submitted for planning (Appendix A). The PDA report is not dated but the revision history of the Circular Economy Statement suggests that ARUP's investigations were conducted before April 2021. The report by ARUP does not provide a quantification of existing m aterials, nor an estimate of the associated embodied carbon. Further investigations were conducted by HTS structural engineers, with their findings being summarised in the Pre-Reclamation Audit report attached to the Circular Economy Statement (Appendix D). Once again, the report is not dated, it is therefore not possible to place the activities conducted by HTS precisely in time. The reclamation audit report includes useful information on the qu antity and on the embodied carbon the scope of the report is limited t o some structural elements (not the entire building). In addition, the GLA Circular Econom y guidance stipulates that pre-demolition audits should be conducted by third-party independent specialists. This requirement is not satisfied, being HTS the structural engineers appointed on th e project. | Clarification - A Pre-demolition Audit was carried out by Arup as independent 3rd party as part of the planning application submission. This has been finalised in response to comments received and includes details of the materials and quantities as required by policy. Please see the updated Pre-demolition Audit . The HTS pre-reclamation audit was carried out by design team structural engineers as they are familiar with the existing building and proposals and are responsible for the structural solution proposed for the development. This is a supplementary document to the PDA therefore we question whether the requirement for an independent third party applies to this element of the document. |

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| 14 | Use of intrusive surveys to determine the technical conditions of existing buildings | Clarification - We have a detailed understanding of the existing building. For the purposes of purchase, design and management a number of intrusive and detailed surveys have been carried out including: |
| | To assess potential reuse of existing buildings, Camden's CPG guidance require applicants to conduct a series of technical studies, also based on intrusive surveys. | Trial pits Core holes Opening up works by Erith |
| | This requirement does not appear to be met at present. Both inves tigation activities conducted by ARUP (pre- demolition audit) and HTS (pre- reclamation audit) are based on visual inspections and other non- intrusive forms of investigation. | Asbestos Building surveyor survey to inform the purchase Building surveyor surveys to assess health and safety requirements; a series of works have been undertaken to the building as a result of this. Professional team have carried out their own inspections and investigations For the WCS buildings we have undertaken extension and thorough audits of the |
| | We understand that the former occupant Travelodge ceased all operation in June 2020 and the existing Selkirk House building is vacant since then. The applicant should clarify the reasons why it was not possible to conduct intrusive investigations in this period of time. | existing fabric as part of the heritage assessment and design process for these elements. |
| | The use of intrusive surveys can provide essential information to establish the potential reuse (either onsite or offsite) of existing materials, as well as being an element of support for the decision-making process relating to possible development options. | Note - Queries from HM, GLA and LBC have been accumulated together for responses in the <i>Clarifications and responses on demolition justification including Pre-redevelopment Audit and retention options appraisal</i> document appended to the Circular Economy Statement. This document brings together information from the planning submission and further clarifications including providing information on the numerous surveys and investigations carried out on the existing buildings to inform the optioneering. |

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| 15 | Existing structure constraints / limitations We note that there is no statement in the optioneering report clai ming that it is not possible to retain and upgrade the existing structure. | Clarification - We have set out in the application the justifications for the proposed scheme . The <i>Retention and Redevelopment Options and Whole Life Carbon Comparison</i> report identifies elements of the existing building that it is not possible to retain such as the car park floors and floors 14-15. Of the elements that might be retained, we are retaining the basement and substructure which make up a significant proportion of the total structure once the elements we cannot re-use have been excluded. |
| | Conversely, the optioneering report provides a description of the structural limitations of the existing building and of the potential interventions required to upgrade the existing structure to modern standards (e.g. strengthening works to increase loading capacity, temporary works to support the tower while demolishing the car park structure, etc). As such, retain and improve the existing building doesn't seem beyond the realms of possibility. | Note - Queries from HM, GLA and LBC have been accumulated together for responses in the <i>Clarifications and responses on demolition justification including Pre-redevelopment Audit and retention options appraisal</i> document appended to the Circular Economy Statement. This document brings together information from the planning submission and further clarifications including addressing the statement that the buildings cannot be retained. |

Errata

As noted in the response to comment no. 3, the headers of Table 2.1 on page 79 of the report should read "Value utilised in Option 1-3" and "Value utilised in Option 2-5"

Changes to Retention & Redevelopment Options report since submission

No changes have been made to the Retention & Redevelopment Options report since submission, all clarifications are included in this Addendum.

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