

Highgate Conservation Area Advisory Committee notes the GLA and Building Regulations now require submission of a BRUKL at planning stage

/0313: JUNIOR FIELD PLAYING PITCHES:

From Decant - Energy and Sustainability Statement.pdf

SP 4 Working towards a Low Carbon Haringey Over the local Plan's life, reducing energy use in buildings and working towards a low-carbon borough will be one of Haringey's key challenges. The Council will promote the measures outlined below to reduce carbon emissions from new and existing buildings. 1) 1. In line with the London Plan policy, the Council will promote and require all new developments to take measures to reduce energy use and carbon emissions during design, construction, and occupation by incorporating the following measures: a) From 2011 onwards, all new residential Development will achieve a minimum 25% reduction in total (regulated) CO2emissions in line with Code for Sustainable Homes Level 4 energy standards and should aim to achieve Level 6. All new residential Development shall be zero carbon from 2016 onwards; and b) From 2011 onwards, all new non-residential Development shall be built to at least BREEAM "very good" standard and aim to achieve BREEAM "excellent" or the current nationally agreed standard. All new non-residential Development shall be zero carbon from 2019.

BREEAM:	Not provided
BRUKL :	Not provided
MISSING INFORMATION:	- BRUKL - BREEAM

/0315: RICHARDS BUILDING:

BREEAM: Not mentioned

BRUKL :

(1) Appendix A - 2022-10-03 RMC GLA 2022 emissions spreadsheet

Address of project and Certifier not provided.

Achieves target

(2) Appendix B.2 - RMC lean 2021_brukpdf

Address of project and Certifier not provided.

Fails to achieve target

(3) Appendix C-2022 0826RMC Part L202021report-issue.pdf

This Appendix only encloses Appendix A

MISSING INFORMATION:

DAS Part 8 (p 37);	Appendix B: empty/ information missing Appendix C: L2A report - sections empty/missing?
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- Appendix D: Correspondence with heat pump manufacturer empty/missing?
- Appendix E: Overheating Risk Analysis: empty/missing?
- Appendix F: Planning policy review: BRUKL not mentioned
- BREEAM
 - BRUKL B2 missing from Appendix C
 - Redesign required.

/0317: SCIENCE BLOCK

BREEAM: Very Good (conditional on further appointments/information)

From Science - BREEAM Pre-assessment.pdf

3.2 Pre-Assessment estimated score and rating This assessment is based on a full refurbishment Part 1-4 scope of works. The generated Pre-assessment Stage assessment score and rating must not be used as an absolute figure, but as an indicator of the anticipated score. Assessors have no jurisdiction over the BRE nor can be responsible for the BRE changing the weightings and calculations, which may result in a possible change of the estimated assessment score. The score is tabulated below and indicates a current targeted score of 67.5% which would give a BREEAM rating of 'Very Good (≥55%)' subject to appropriate evidence being made available by the respective stakeholders. This rating is therefore based on a conservative view of the development meeting the credit requirements, and some anticipation of works yet to be appointed including those still to be confirmed by the Client. Assumptions have been made and previous project experience has been used to determine credit scores, where insufficient information currently exists. This estimated score is a conservative indication and does not guarantee any specific score will be achieved. Some credits that are considered to currently be 'out of project scope', or unknown, have been identified in Scenario 2 indicating an increase in the scope of works, further clarification is required, external consultant appointments are needed or there is a possibility of higher credit scores being achieved based on the project team's performance etc. If all these credits in Scenario 2 were targeted and achieved, the score could increase up to 77.79%, which would give a BREEAM rating of 'Excellent (≥70%)'. Further documentation has been requested from the team in order to confirm if these credits can be targeted based on available evidence. Please also note that some of these credits are based on requirements that need to be carried out/completed before end of RIBA stage 2. These credits may be at risk unless required appointments and activities have already been carried out. TB+A recommended that a 'buffer' of at least 4-5% is targeted over any rating threshold in order to mitigate the risk of credits being lost during the assessment, construction or withheld by the BRE as part of their Quality Assurance procedures.

BRUKL : Not provided

MISSING INFORMATION:

- BRUKL
- Full refurbishment information required
- Too much other information still required

/0328: DYNE HOUSE

Information submitted:

Dyne - Energy Statement Appendix A GLA Carbon Emission Reporting

Dyne - WLC Appendix A GLA Reporting Template

These documents use a bespoke spreadsheet which seems to be very un-user friendly. They do not appear to meet current policy requirements.

BREEAM: None found

BRUKL : None found

- MISSING INFORMATION:**
- Wrong form used?
 - BREEAM
 - BRUKL

/0338: MALLINSON

Text copied from 'Highgate School MSC 4 Phases Energy Assessment' submitted with Application

SP 4 Working towards a Low Carbon Haringey Over the local Plan's life, reducing energy use in buildings and working towards a low-carbon borough will be one of Haringey's key challenges. The Council will promote the measures outlined below to reduce carbon emissions from new and existing buildings. 1) 1. In line with the London Plan policy, the Council will promote and require all new developments to take measures to reduce energy use and carbon emissions during design, construction, and occupation by incorporating the following measures: a) From 2011 onwards, all new residential Development will achieve a minimum 25% reduction in total (regulated) CO2 emissions in line with Code for Sustainable Homes Level 4 energy standards and should aim to achieve Level 6. All new residential Development shall be zero carbon from 2016 onwards; and b) From 2011 onwards, all new non-residential Development shall be built to at least BREEAM "very good" standard and aim to achieve BREEAM "excellent" or the current nationally agreed standard. All new non-residential Development shall be zero carbon from 2019. 2) 2. The Council will promote low- and zero-carbon energy generation through the following measures: a) Requiring all developments to assess, identify and implement, where viable, site-wide, and area-wide decentralised energy facilities, including the potential to link into a wider network; b) Establishing local networks of decentralised heat and energy facilities by requiring developers to prioritise connection to existing or planned networks where feasible; c) c. Working with neighbouring boroughs and other partners to explore ways of implementing sub-regional decentralised energy networks, including the potential in the Upper Lee Valley Opportunity Area; and d) Where viable, all new developments are required to reduce predicted carbon dioxide emissions by 20% from on-site renewable energy regeneration, including connections to local sources of decentralised renewable energy.

The GLA Carbon reporting tool calculates the electricity carbon emission using a fixed factor. The new building regulation considers the seasonal variability of the grid-supplied use of renewable wind energy. It applies the monthly variable factor as shown in Table 8 2021 new month carbon emission factor (June 2022). The GLA method increases the carbon above the BRUKL report and substantially increases the carbon offset payment compared with the building regulation method. The GLA carbon reporting tool 2022 and the Be Seen reporting tool. It is provided as separate documents.

The design team will consider design flexibility as the BREEAM assessment process requirement.

- For example, adding a mezzanine floor to the sports halls could create additional classroom space. The sports hall is already designed as a multifunction space.
- For example, a sporting arena to have alternative uses for performance and theatre arts, school gatherings and assemblies and an examination room.
- The north block floorspace is essentially an open plan structure and can be subdivided to suit alternative uses. Gyms and studios can be easily repurposed.

BREEAM: the only mention of BREEAM is in the introduction to the paragraph above. BREEAM targets do not appear to have been set.

BRUKL : Application appears to meet GLA criteria but HGY/2023/0331 Formal Screening Opinion flags up issue of noise from air source heat pumps for neighbour at no. 27 Broadlands Road.

MISSING INFORMATION: - BREEAM

/0390: SCIENCE BLOCK LISTED BUILDING APPLICATION

BREEAM: - Not provided

BRUKL : - Not provided

MISSING INFORMATION: - No information on any carbon reduction measures
- See /0317

/0679: DYNE HOUSE LISTED BUILDING APPLICATION

Text copied from 'Dyne House Planning Statement.pdf' submitted with Application : Policy SP4: 'Working Towards a Low Carbon Haringey': - "Over the life time of the Local Plan, reducing energy use in buildings and working towards a low carbon borough will be one of the key challenges facing Haringey" - "From 2011 onwards all new non-residential development shall be built to at least BREEAM "very good" standard and should aim to achieve BREEAM "excellent" or the current nationally agreed standard. All new non-residential development shall be zero carbon from 2019."

"5.14 In relation to forthcoming applications at Dyne House and the Island Site, the SPD states that refurbishment and development proposals should have regard to the following:

- ensure buildings are highly sustainable with a target of BREEAM 'Very Good' aiming for 'Excellent' where feasible.;"

"7.80 In accordance with local planning policy, the development has been assessed against the BREEAM methodology and it is shown that the project will achieve Very Good and a pathway to achieving Excellent is noted. Again, the School is committed to striving for BREEAM excellent at the detailed design stage of the project."

BREEAM: Apart from the above quotations no information about what level of BREEAM would be achieved is provided

BRUKL : There are no references to BRUKL in the above document

MISSING INFORMATION: - BREEAM
- BRUKL
- Presumably the tunnel and basement area should be evaluated

/0316: Far Field

Please refer to the objection submitted by Highgate Conservation Area Advisory Committee.

From Summary in /0331; In view of the above, a suitable drainage strategy has been developed to mitigate the risk of flooding at the Proposed Development site. Overall, it can be concluded that consideration of these matters as part of an EIA is not required.

HCAAC does not agree with this assessment.

/0331: FORMAL SCREENING OPINION re. EIA

BREEAM

5.225 Mallinson: very good, could achieve excellent

5.227 Richards bldg: very good

5.228 Science Block: very good

5.231 Dyne House: very good

5.232 Decant: none

5.233 Far Field: none

5.234 Summary: "As mentioned above, the Proposed Development includes measures to respond to the climate emergency and **will improve the performance and resilience of the estate as far as possible**. The School has also developed their own Sustainability Strategy and Environmental Policy with aspirations to be as sustainable an institution as possible and are committed to making a positive impact by planning for and achieving **outstanding** environmental sustainability performance. **Overall, climate change effects are not considered to be significant, and an EIA is, therefore, not required for this element.**"

BREEAM:

- see individual planning applications

BRUKL :

- see individual planning applications

MISSING INFORMATION:

- see individual planning applications

- the climate effects do not meet current policy, are hardly aspirational and certainly do not achieve 'outstanding environmental sustainability performance' as claimed in paragraph 5.234. Therefore the assessment that 'an EIA is, therefore, not required' is in our opinion deeply flawed.
