STRATEGIC DEVELOPMENT COMMITTEE 13th November 2024

UPDATE REPORT OF THE DIRECTOR OF PLANNING AND BUILDING CONTROL

Agenda item no	Reference no	Location	Proposal / Title
5.1	PA/24/00243	7 Brannan Street	Redevelopment of the site to provide purpose built student accommodation with associated amenity space and Class E(a)(b) floorspace within a building of up to 46 storeys with basement; together with plant, car and cycle parking facilities, associated servicing, access and landscaping and all associated ancillary works and structures. This application is accompanied by an Environmental Statement.

1. UPDATED ENERGY STATEMENT

1.1 Following receipt of the GLA Stage 1 Report, the applicant has been engaged with the GLA's energy officer to address a number of matters, the majority of which were settled prior to publication of the main report. However, the GLA's energy officer had requested that the applicant address an issue with the modelling of the energy efficiency of the building. The remodelling was requested due to a technical issue with the figure used to represent the building's Air Source Heat Pump system's "Seasonal Coefficient of Performance" which represents the overall efficiency of the heat pump system across a heating season.

1.2 The applicant was originally of the opinion that they had used the correct figure in the modelling and that it had been undertaken in accordance with GLA guidance and industry advice. However, following discussions with the GLA the applicant has undertaken the remodelling as requested and provided an updated energy statement using the relevant SCOP figure.

1.3 The result of this remodelling is that the overall "be green" energy savings of the scheme are significantly reduced and the overall reductions in carbon emissions against the baseline would fall from 29% to 4%. This subsequently increases the requisite carbon offset contribution by £90,801 to **£343,867**.

1.4 Whilst the level of reduction remains below both London Plan and Local Plan Policy targets of levels of carbon emission reductions, and has resulted in a lower figure than under the initial modelling, officers would note the following:

a) There are very specific difficulties with PBSA developments meeting the target thresholds for carbon emission reductions relating to the treatment of the building as a commercial building rather than a residential one for the purposes of Part L of the Building Regulations. For instance, in respect of heating of buildings the baseline used for residential buildings accounts for gas-fired boilers whereas the baseline for commercial buildings already includes air source heat pumps, and so the inclusion of this technology in a PBSA building has a significantly lower impact on the reduction of emissions than it would under a standard residential scheme. A true commercial building such as one in office use could also make use of a wider range of other efficiency measures to further reduce emissions that a PBSA building could not by virtue of the residential features of a PBSA building, such as comfort cooling.

b) The applicant has consistently and adequately applied the energy hierarchy to the development in line with the requirements of the London Plan and the building has therefore incorporated the highest standards of thermal and energy efficiencies and has maximised the use of these throughout the design development process. The energy strategy for the building has not changed from that which was originally proposed and incorporates the latest in efficient heating technology in a 5G Air Source Heat Pump system. The building will also be required to obtain BREEAM Outstanding standards.

c) The residential nature of the building means that various other considerations need to be balanced against the introduction of further energy efficient measures include noise insulation and overheating of the building.

1.5 The difficulty for commercial schemes in meeting the requisite carbon reduction targets is acknowledged by the GLA themselves in their issued "Part L 2021 and the Energy Assessment Guidance 2022 – cover note" where they state:

"*Initially, non-residential developments may find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35 percent improvement. This is because the new Part L baseline now includes low carbon heating for non-residential developments but not for residential developments. However, planning applicants will still be expected to follow the energy hierarchy to maximise carbon savings before offsetting is considered".*

1.6 The LPA's energy sustainability officer has reviewed the updated Statement and has confirmed that he remains satisfied with the proposals given that they continue to provide the highest standards of energy efficiency in line with the evidence base for the emerging Local Plan and for the reasons stated above.

1.7 Officers therefore continue to be satisfied that the building continues to represent a highly efficient and sustainable proposal which includes a high standard of energy efficiency. The shortfall in carbon reductions appears to primarily relate to the interrelation between buildings regulations requirements and the requirements of adopted policies as regards a PBSA building rather than any particular inefficiencies in the building's design or energy strategy. Officers are therefore satisfied that, subject to securing the increased carbon offset contribution, the recommendation in the main report remains unchanged.

2. RECOMMENDATION

2.1 The officer recommendation set out in the main report to **grant planning permission** subject to the planning conditions and planning obligations, listed in the main report, except that the carbon offset contribution (obligation c.) shall be increased:

c. £343,867 towards carbon emission off-setting.