

Information Systems Division

Kensington Town Hall, Hornton Street, London, W8 7NX

Head of Information Systems Division

Barry Holloway

Kevin O'Connor
Cranbrook Basements Ltd

21 March 2014

My reference: FOI2014-361
Your reference: KOC/ab/060314
Please ask for: Robin Yu

Dear Mr. O'Connor

FREEDOM OF INFORMATION REQUEST REF: 2014-361

I am responding to your request under the Freedom of Information Act 2000, which we received on 6 March 2014, for information held by the Council.

Although you asked for information in relation to 16 case studies, we have provided a single response encompassing all the case studies you asked about:

Eight Associates were commissioned by RBKC Council to provide a comparative analysis of the carbon footprint of above ground and subterranean extensions within the borough. The main aim of the report was to provide a clear and neutral comparison between these two types of extensions and to evaluate how these types of extensions could achieve compliance with the new proposed policy requirements.

The purpose of the 2014 report was not to provide evidence that subterranean extensions are more carbon intensive than above ground extensions but to carry out a comparative analysis. The report's key findings demonstrated that subterranean extensions are more likely to have higher associated carbon emissions relative to above ground extensions; this was the conclusion of the study and not its aim.

Eight Associates do not have a commercial interest in providing these conclusions, and the study does not represent any conflict of interest. Eight Associates have aimed to provide an objective, clear and transparent report and have incorporated the lessons learned from the previous public

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consultation process (July 2013). This involved carefully embedding the main recommendations from environmental professionals who reviewed the 2010 Eight Associates report as part of the 2013 public consultation process. Following these recommendations, the scope of the works for the 2014 study was improved and a broad range of case studies were analysed to improve.

Eight Associates consider that the data within the report is more than adequate to allow a third party to undertake their own analysis based on the same methodological process and by using the openly accessible data sources. Additional analyses and calculations are the property of Eight Associates and Eight Associates consider that its disclosure would impact upon the future commercial interests and opportunities of the company.

Eight Associates request that the consultation process is undertaken constructively by any parties wishing to express their interests and concerns. Additional objective analysis of the environmental impact of different types of extension and focusing efforts on the conclusions and methodology of the study would be the most productive approach. This would allow the findings to be compared and contrasted on an equal basis founded on their merits.

a) Please provide a full and detailed schedule of each document that has been relied upon by Eight Associates to complete their calculations and report.

Planning application reference numbers have been provided. For measured areas of the dwellings, both the gross internal area before and after the development are detailed in Appendix 2.

b) Please provide a full set of calculations together with detailed workings and conclusions for each constructional element. For the avoidance of doubt we are requesting copies of all detailed calculations in order that we may check these calculations for accuracy.

The spreadsheets used for calculations are Eight Associates property and the disclosure of such information was not included in the original contractual agreement. Also, the release of this information would involve the disclosure of third party proprietary information, under confidential agreements.

However, the basis for all calculations, assumptions, methodological approach, and references has been provided in full detail. The level of detailed information provided allows any party to undertake their own analysis.

c) Please provide written confirmation of any "assumptions" made with regard to this Case Study so far as those assumptions affect the calculations carried out.

The 2014 report has been produced in line with a standardised methodology and follows its recommendations to clearly provide all the data and methodological steps necessary for third parties to replicate, evaluate and comment on the findings of the study. The methodology was intentionally

aligned with best practice recommended in international standards such as British Standard ISO 21931-1, section 5. The Eight Associates 2014 report's structure and content follows all the steps recommended by this section of the British Standard, thus providing the required and requested depth and quality of information.

The report provides a detailed methodological explanation, a description of the limited number of assumptions used and the data sources used for the whole analysis. For the avoidance of doubt please see Appendix 1, pages 48-52 where these issues are described in full detail.

Embodied Carbon calculations have been made using the Building Research Establishment's Green Guide to Specification; this database provides environmental rankings based on Life Cycle Assessments used for all of the UK's Environmental Assessments: EcoHomes, The Code for Sustainable Homes, and all versions of BREEAM.

Operational Carbon calculations have been made using the UK Government's approved Standard Assessment Procedure software, which calculates energy consumption in UK dwellings. For the avoidance of doubt, Eight Associates are accredited BREEAM and energy assessors and as such have experience with both of these data sources accordingly.

The analysis and results are shown in Chapter 1.2 to 1.5, the carbon results in kgCO₂/year are detailed here. For measured areas of the dwellings, both the gross internal area before and after the development are detailed in Appendix 2.

d) Please provide a copy of document which was relied upon to determine the extent to which each project would be measured for calculation and the constructional elements contained therein. For the avoidance of doubt it would appear that certain key construction components have been omitted from the above ground case studies and we wish to determine why those elements which have a high carbon content have been ignored.

For all the case studies analysed the same construction elements were included in the calculations. External walls, roofs, windows & rooflights and floor build-ups were taken from the BRE Green Guide, for details please see pages 16, 48 and 49 of the report. The purpose of the report was a comparative analysis; therefore the exact same construction elements were included in the subterranean extensions and above ground extensions.

Please note that precise dimensional information to allow a calculation of height, width, volume and mass is required. This information is not available by simple reference to the RBKC website because we do not have a schedule of documents relied upon for the purposes of the calculations nor do the plans contain dimensions and in a significant number of cases are simply scanned documents which are unreliable.

All measurements were taken from the drawings provided within the RBKC planning portal using digital takeoff software to ensure accuracy was

maximised. Eight Associates is aware of the limitations of using the drawings available on the planning portal that do feature some scans, however, this is the only information that is widely available and the level of accuracy provided by using digital takeoff software is adequate for the intents and purposes of the study.

Complaints

I trust this has satisfied your request. Should you be unhappy with the handling of your request, the Council has an internal complaints process for handling FOIA complaints. Complaints are reviewed by the Chief Solicitor and Monitoring Officer or her nominee. A form is available from our website to lodge your complaint

<http://www.rbkc.gov.uk/councilanddemocracy/freedomofinformation.aspx>

Please contact us if you do not have website access and we can provide you with a copy of the form. Following this review, should you still be unhappy with how your information request has been handled, you have a further right to appeal to the Information Commissioner who is responsible for ensuring compliance with FOIA.

Yours sincerely

Robin Yu

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