Effingham Parish Council

Proof of Evidence
Sustainability Issues

Steven Pidwill

BA (Hons) Dip Arch RIBA MAPM FRSA APS

In respect of

APPEALS BY BERKELEY HOMES (SOUTHERN) LTD:

LAND AT EFFINGHAM LODGE FARM, LOWER ROAD, EFFINGHAM, LEATHERHEAD, SURREY, KT24 5JR
HYBRID APPLICATION

Planning Inspectorate Ref: APP/Y3615/W/22/3298341
Local Authority Ref: 21/P/01306

and

HOWARD OF EFFINGHAM SCHOOL, LOWER ROAD, EFFINGHAM, LEATHERHEAD, KT24 5JR
RESERVED MATTERS APPLICATION (RMA)

Planning Inspectorate Ref: APP/Y3615/W/22/3298390
Local Authority Ref: 21/P/00428

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Sustainability issues

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1. Introduction, Qualifications and Experience

1.1. This proof of evidence has been produced by Steven Pidwill, on behalf of Effingham Parish Council (EPC) in the planning appeal by Berkeley Homes (Southern) against the refusal of planning permission by Guildford Borough Council on land at Effingham Lodge Farm, Surrey. KT24 5JR. Planning Inspectorate Ref: APP/Y3615/W/22/3298341 Local Authority Ref: 21/P/01306

1.2. This evidence will focus on sustainability issues relating to the assessment of school build options and the evaluation of benefits and harms in the balancing exercise attributable to such options to determine the case for very special circumstances in deciding this appeal.

1.3. The author, Steven Pidwill, is an architect with forty years post- qualification experience. EPC requested the expert opinion of Steven in relation to the Hybrid Appeal having first encountered his publication with CABE (Commission for Architecture and the Built Environment), a guide for anyone concerned with existing school buildings, which sought to re-evaluate the role of refurbishment in the transformation of Secondary Schools. (Annex 1)

1.4. In this capacity, Steven has contributed to the evolving debate on how the construction industry must address the challenges of the climate emergency,-which now requires a step change in the way that the industry evaluates design and construction projects and, consequently, how it tackles the challenge to become carbon neutral.

1.5. Steven is a director of Shepheard Epstein Hunter which he joined in 1982, becoming a director in 1988. He has been responsible for projects concerned with regeneration masterplans (Salford Quays), libraries, listed buildings on constricted urban sites, schools, science research and university buildings and masterplans, and urban housing schemes in both private and public sectors.

1.6. Shepheard Epstein Hunter has been in existence for over eighty years, and many of the projects carried out by the practice over this period have been concerned with buildings and landscape for all stages of education.

1.7. In the past thirty years most of the non-residential work of the practice has been concerned with the imaginative transformation of existing buildings through refurbishment and/or extension, which has become known, in more recent years, as ‘adaptive re-use’ and ‘retrofit’.

1.8. Recent relevant projects to this case include:

- The extension and refurbishment of a Victorian school building in west London to suit the requirements of a one-form entry primary school (£2m)
- Adaptation and refurbishment of a Grade II Listed mid 20C building in Norwich to enable its use as state-of-the-art Life Sciences research and academic accommodation (£50m)
- Adaptation, refurbishment and extension of a Victorian locally listed building and a mid 20C building to create a new university Business School (£11m)

- Adaptation, refurbishment and extension of a 1958 building in two phases to accommodate a university Students' Union. Here, the client originally planned to demolish the building, but the practice was able to demonstrate that retaining and adapting the existing building offered better value than a new build replacement, was less disruptive, provided arguably a better and more interesting facility, and was more sustainable. This project was subsequently recognised in 23 awards schemes, including 'Best New [sic] Building' by the local Civic Society.
- Adaptation, refurbishment and extension of a Sixth Form College in east London (£7m) to improve facilities, as Phase One of a masterplan, with construction work carried out while the College continued in operation (with approximately 2,700 FTE students and 230 FTE staff).

1.9. Shepheard Epstein Hunter's work in transforming existing building, for which Steven has been responsible, has been recognised in awards schemes such as the Civic Trust, Planning, AJ Retrofit, Education Estates, and the RIBA.

1.10. Steven is a RIBA Part III professional practice examiner at The University of Cambridge (since 2003, chair of examiners panel since 2012) and the Bartlett School of Architecture (University College London). He has also acted as an external examiner of undergraduate architecture year 3 at the University of Nottingham.

1.11. He is Association of Project Manager (APM) qualified as a project manager and a Design Council Expert.

1.12. As a Commission for Architecture and the Built Environment (CABE) enabler for education, Steven prepared the 2009 CABE guide: 'Transforming school buildings New from old: transforming secondary schools through refurbishment.' (Annex 1)

1.13. Steven has written for *Architecture Today* magazine, reviewing the projects of other architects and architectural projects including sustainable housing, university libraries, business schools, halls of residence, schools and major Passivhaus projects (a certified approach to designing energy efficient buildings). He is skilled and highly experienced and thus able to utilise such skills and experience in considering the design proposals of this application.

2. Evidence in chief

2.1. Much has changed in the design and construction industry, and indeed in the world since the original application of 2014.

2.2. Last year's Intergovernmental Panel on Climate Change (IPCC) report made clear that the world has little over a decade to radically reduce its carbon emissions to avoid catastrophe. If progress is to be made on these goals, the true impact of new build projects in the construction industry needs to be considered and addressed. (Annex 2) We need to be making the decisions *now t*hat can improve outcomes for the planet. The impact of this hybrid application should therefore, in my opinion, carry very substantial weight when considering the harms in the balancing exercise of this appeal.

2.3. Recognising this change, and published in October 2021, the Royal Town Planning Institute's (RTPI) '*The Climate Crisis: A Guide for Local Authorities on Planning for Climate Change,'* conveys 'three shared messages' for planners and the wider community (Annex 3):

- **Ensure that tackling the climate crisis is at the heart of the vision for the future of our communities**. [my emphasis]
- Recognise how vital planning is to securing that vision – both directly, through facilitating the extension of renewable energy generation, and strategically, through practical nature-based solutions and design actions that can promote sustainable travel, urban cooling, or natural flood defence.
- Finally, recognise how many of the actions necessary to tackle the climate crisis are also key in creating healthy, ecologically rich, prosperous and beautiful places for us and for future generations.'

2.4. It follows, from the first of the RTPI's shared messages, that any consideration of the information which is the subject of this appeal must consider its impact on the environment and relevance in mitigating the climate emergency.

2.5. In 2022, my experience is that the industry and government are, increasingly, much more seriously concerned with the impact of design and construction projects on climate change and the environment. As a result, demolition is becoming an option of last resort.

2.6. Transformation – by which I mean the process of adaptation, extension and refurbishment - can lead to excellent works of architecture, sometimes better than might have been achieved with the replacement option, as has been demonstrated by famous buildings such as the British Museum and the Royal Festival Hall. It would be difficult to argue credibly that replacing them would have produced better results.

2.7. Given the embodied energy within an existing structure, and our increasing awareness of the urgent need to reduce carbon and shift towards renewable resources, it is a-waste to discard structures without careful thought just because they are not new or because transforming them might entail greater effort than that perceived in the construction of a new building.

2.8. ‘Embodied energy’ is a term used to describe the amount of the earth’s resources that have been spent in making something, for example: the amount of raw material, excavation, heat, power and transport that will have been used to make a building’s steel frame.

2.9. In November 2017 the Royal Institute of Chartered Surveyors (RICS) published *Whole Life Carbon Assessment For The Built Environment* (Annex 4) which noted that up to that point…‘The built environment industry has so far been addressing mainly **operational emissions** [my emphasis] via reduction targets in building regulations (Part L), planning requirements by local authorities and sustainability assessment rating schemes (BREEAM, LEED, etc.) with **the embodied aspect of carbon emissions not being fully addressed** [my emphasis]. To acquire an overall understanding of a built project’s total carbon impact, it is necessary to assess both the anticipated operational **and embodied emissions** [my emphasis] over the whole life of the asset. Considering operational as well as embodied carbon emissions together over a project’s expected life cycle constitutes the whole life approach.’

2.10. In September 2019, The World Green Building Council in its report, ‘*Bringing embodied carbon upfront: Coordinated action for the building and construction sector to tackle embodied carbon,’* defines embodied carbon thus: *‘Carbon emissions associated with materials and construction processes throughout the whole lifecycle of a building or infrastructure.* (Annex 5) Embodied carbon therefore includes: material extraction…, transport to manufacturer…, manufacturing…, transport to site…, construction…, use phase, maintenance…, repair…, replacement…, refurbishment…, deconstruction…,transport to end of life facilities…, processing…, disposal.’

2.11. In 2019, the *Architects Journal*, a respected and influential weekly publication, launched ‘Retrofit First.’ This campaign notes that the UK construction industry produces 35-40 per cent of the country’s total emissions and states: ‘*One reason construction consumes so much is because it is based on a wasteful economic model which often involves tearing down existing structures and buildings, disposing of the resulting material in a haphazard fashion, and rebuilding from scratch. According to the Department for the Environment, Food and Rural Affairs (Defra), of the 200 million tonnes of waste generated in Britain annually, 63 per cent is construction debris. We lose more than 50,000 buildings through demolition every year and, while more than 90 per cent of the resulting waste material is recovered, much of this is recycled into a less valuable product or material, rather than being reused.’*

2.12. It also cites Anne Power, emeritus professor of social policy at the London School of Economics, who believes that demolition is both costly and unpopular, stoking opposition to development among the general public. The AJ campaign believes that ‘*Retrofit of existing buildings, on the other hand, is cost-effective and generally less controversial, because it conserves and enhances existing places and neighbourhoods. As for carbon emissions, retrofit makes sense because of the substantial embodied energy savings made in repurposing existing buildings, compared with the ultra-high embodied energy costs of demolition and rebuild. Last year’s Intergovernmental Panel on Climate Change (IPCC) report made clear that the world has little over a decade to radically reduce its carbon emissions in order to*

avoid catastrophe. Yet construction remains skewed towards energy-intensive new build. To give an example of the impact, RICS has found that, by practical completion stage, 35 per cent of the whole-life carbon of a typical office development will already have been emitted, while the figure for residential is 51 per cent.' The campaign 'proposes a major reduction in the consumption of raw materials and energy in the built environment through the adoption of circular economy principles. It opposes unnecessary and wasteful demolition of buildings and promotes low-carbon retrofit as the default option.'

2.13. The President of the Royal Institute of British Architects, Simon Alford, has made the case concisely for a new approach to our existing building stock: *'It is essential that we think reuse first, new build second.'* I find no evidence of this in this appeal case.

2.14. As a result of these concerns, the more recently published (April 2022) relevant pan-industry initiative is the campaign for 'Part Z', a proposed amendment to the UK Building Regulations 2010 (which currently provide Approved Documents A to S), a 'proof of concept' for implementing embodied carbon regulation, aligned with the RICS Professional Statement *Whole life carbon assessment for the built environment* referred to above, and guidance and recommendations made by the Royal Institute of British Architects (RIBA), the Institution of Structural Engineers (IStructE), the Chartered Institution of Building Services Engineers (CIBSE), the UK Green Building Council (UKGBC) and LETI (originally 'The London Energy Transformation Initiative'). (Annex 6)

2.15. Both the Royal Institute of British Architects (RIBA) and the Architects Registration Board (ARB) have published new guidance to ensure that architects place the climate emergency at the heart of what they do. The RIBA 2030 *Climate Challenge*, (Annex 7) for example, refers to LETI's one page summary (Annex 8) of the recommended approach to embodied carbon, which includes as the first action under the heading 'Build Less': '*Challenge the client brief for spatial efficiency; Re-use and renovate existing instead of new build, where possible; Carry out audit of materials on site for Circular Economy purposes*'. ARB has published its '*Strategic Statement: Climate Change & Sustainability,'* (Annex 13) which states '*We are committed to ensuring that all architects engaged in the design and delivery of buildings have the competences to do so in order to address the Climate Emergency'* and notes that *'All architects in practice have a responsibility to ensure that they are sufficiently competent in terms of the skills, knowledge, experience and behaviours in order to be able to address climate change through sustainable architecture. Given the long-term effects of design decisions, architects should also aspire to do more than just comply with current legislation and Codes. In order to do this all architects must have an understanding of the global context in which they practise and the implications their decisions and activities have for sustainability. Alongside a commitment to strive for sustainable design solutions, architects need the technical knowledge and skills to apply the appropriate design principles and construction technologies and use resources efficiently in order to promote sustainability. To achieve this aim, architects need to be 'energy-literate' and take active steps to minimise the potential longer-term environmental impact*

of their work, by addressing where, how and with what materials constructions are designed.'

2.16. With regard to the subject of this appeal, it follows that any assessment of the benefits of the proposed new school should today, in my opinion, include a comprehensive and holistic assessment of the climate emergency impact of the new build options relative to the potential for retaining and transforming the existing accommodation. This should be considered a key component of the planning balancing exercise to be undertaken for this application: at the outset of a project (RIBA Plan of Work Stages 0, 1, 2) it is essential to rigorously consider the potential of any development which affects existing buildings to investigate how those buildings may be improved or transformed without complete replacement or demolition.

2.17. Such an assessment should take the form of an Option Appraisal which compares the transformation option with its equivalent demolition and replacement option. Key parameters which should generally be compared include:

- Embodied carbon
- Operational carbon
- Energy consumption
- Value for money
- Efficient use of land
- Phasing
- Future maintenance and replacement costs and environmental impact
- Impact on the business (in this case, the school) during construction and in the longer term
- Compliance with government policy with regard to the climate emergency
- Impact on all aspects of the local environment

2.18. Our common understanding of the world and the role that buildings must play in mitigating environmental damage has changed significantly in the eight years since the original application. It is not apparent from the Berkeley Homes Statement of Case (SOC) that such an updated and comprehensive appraisal of the climate emergency impact of the proposed new build proposal for the Howard of Effingham School has been prepared.

2.19. It is now common practice for Local Planning Authorities to require the submission of a sustainability statement with planning applications of any significant scale, and thus, based on my experience and awareness of current and emerging sustainable design and construction issues, a project such as this - particularly one seeking to support a justification of very special circumstances to build on greenbelt land - should include a thorough evaluation of the impact of the proposed new build project on the climate and environment alongside a comparison of alternative

options which have been genuinely and objectively considered. I can see no evidence of this in the application documentation.

2.20. I would expect the applicant to support this approach, on reflection, and accept the case I am making. Rob Perrins, Chief Executive, Berkeley Group has committed to the UK Green Building Council's Net Zero Whole Life Carbon Roadmap for the Built Environment as follows: 'Berkeley has set 1.5 degree aligned science-based targets which address the whole life carbon impacts of our business activities, including the emissions created by our supply chain and our homes. The UKGBC's Roadmap will support us, and the wider built environment sector, to deliver against our targets and to find solutions to the complex challenges involved.' Rob has also said: '*This framework [the UKGBC industry framework for net zero carbon buildings] is an important step towards defining net zero carbon buildings and helping the industry understand how they can be delivered. We want to help lead this work, which is so important to decarbonising the built environment and protecting our planet for future generations.*' This project is a perfect opportunity for Berkeley Group to follow the lead of their chief executive and give weight to his words.

2.21. The UKGBC Net Zero Whole Life Carbon Roadmap guidance (Annex 11) to which Rob has committed Berkeley, as above, specifies:

- 'Circular design principles are necessary for reducing the total life cycle impact of buildings: An industry-wide behavioural shift is required for **prioritising the reuse of assets and materials,** [my emphasis] along with greater flexibility and creative thinking around how we can better utilise our existing stock. In the Roadmap trajectory, this looks like:
- A 20% reduction in material usage through design efficiency by 2050
- A 10% reduction in material demand by 2040 through increased material reuse
- 25k new homes PA from 2025 onwards via change-of-use conversions
- A 10% reduction in new office / residential demand by 2040 through improved utilisation of existing building stock
- **Reuse must be the first approach considered by designers and developers alike**, [my emphasis] which whole life carbon assessments should help incentivise. Every stakeholder in the value chain has a role in proactively recommending circular approaches and ensuring that circularity is considered at every step.'

2.22. In this hybrid application, which seeks to justify special circumstances to support a new and expanded school, I cannot see that an attempt has been made to revisit the options considered as part of the original application of 2014, and no attempt to follow the UKGBC Net Zero Whole Life Carbon Roadmap is apparent from the documents submitted. This appears remiss given the significant developments in approaches to design and architecture since 2014, and to which I have referred to above. This should warrant a full-scale re-evaluation of design options. If, as appears to be the case, this application seeks to pursue a new and expanded school as the most cost-effective design solution to meet the educational requirements of

the design brief, a re-assessment of options utilising the parameters set out in 2.17 above should be completed.

2.23. As noted above, the Architects Registration Board (ARB) and the Royal Institute of British Architects (RIBA) have relatively recently introduced initiatives to strengthen architects' responsibilities to address the climate emergency. (Annex 9) Architect Scott Brownrigg, which is aligned with both organisations, is a signatory of the *Architects Declare* movement (a network of architectural practices committed to addressing the climate and biodiversity emergency) (Annex 12) and the RIBA 2030 Climate Challenge (Annex 7); and one of the few architects to have signed up to the UN Global Compact. Scott Brownrigg has stated that these commitments inform its environmental objectives and targets, and thus I am confident that, on reflection, the practice will wish to support my observation that these issues should be fundamental to the Statement of Case for the appellant. A comprehensive evaluation of climate impacts for the project has not been presented, when in my opinion, one is required and should be a critical component of the balancing exercise to be undertaken at this appeal.

2.24. Re-using existing buildings is a form of recycling and in my view, an educational establishment should seize this local opportunity to lead the way on combatting the climate emergency. Schools can and should play a pivotal and responsible role in developing and influencing ideas for addressing the climate emergency and thus the refurbishment and recycling of its own buildings and operating materials. Perhaps on reflection, the school might also re-consider its role in educating communities and our future leaders on such issues and leading by example on climate change.

3. Comments upon the Berkeley Homes Statement of Case

3.1. Para. 7.9 of the Appellant's SOC asserts that the '*proposed development effectively represents an extension to the Approved Masterplan – one necessary to ensure it is viable and delivers the benefits inherent within it*.' I contend that it is not possible to state with any confidence at this time, that the current design proposals are either necessary, or that the benefits assumed to be inherent within the previous scheme could not be more cost-effectively achieved through other design options. Without a re-evaluation of the options, including options that seek to limit the environmental and climate change impacts of a new build school and further market housing, the proposed extension to the previously consented scheme should not be accepted as the most cost-effective means of ensuring viability or delivering the desired educational benefits.

3.2. Berkeley Homes also states: *'Since the original planning application was made to GBC in 2014, the need for the school has not diminished and there remains a profound educational requirement for a new school*.' The school exists, and thus a new school is not, in fact, proposed – rather this potentially misleading statement interprets the need for improvements to educational facilities as only possible with a new school *building*. I believe here the appellant is conflating the need for improved educational facilities with the school's desire for a new building. The two ideas are very distinct and should be considered as such.

3.3. 7.14 of the Appellants SOC quotes para. 25 of the inspector's report to assert that the justification for special circumstances to justify building on greenbelt land remains unchanged: '*The key determinant for the very special circumstances case for the 2018 permission was the need for the new school, with the SoS agreeing that "the existing school premises are not fit for the purpose of meeting modern educational and social need and that the replacement of the school in order to facilitate this carries very substantial weight.*' This repeats the conflation of 'new school' with 'new school building' noted in my para 3.2 above. The perceived deficiency of the school buildings in supporting the delivery of the educational and social needs of the community does not automatically lead in the current context to a new build replacement school. It is quite possible, and I would contend desirable, that if possible, replacement facilities can and should be provided through the retrofitting and refurbishment, at least in part, of the current estate. It is not possible to at this point to establish the viability of this transformation with certainty because an up-to-date evaluation of options has not been prepared. In the light of substantially changed circumstances and our now common understanding of the climate and environmental impact of new build construction and demolition it is, in my opinion, important that such assumptions should be challenged.

3.4. Similarly, in 7.15, the appellant uses paragraph 39 of the Secretary of State's decision to support their assertion that the proposed benefits of the new school are so significant that they 'clearly outweigh' all harm to the greenbelt and this should remain the case today. However, the Inspector and the Secretary of State were not making decisions in the light of the current climate emergency (on 9 July 2019 Surrey County Council declared a 'climate emergency') and did not have

recourse to current thinking and guidance on the impacts of climate change. Government policy and industry standards have now shifted substantially with regard to the design and delivery of construction projects. Hence, for reasons explained above, any new appraisal of harm to greenbelt and 'other harms,' should include an up to date and rigorous appraisal of climate change impacts and the lesser harms that might be achieved by retention and transformation of the existing school estate.

3.5. Again, in 7.17, it is asserted: '*The replacement secondary school brings benefits in terms of improving the suitability and sufficiency of the school estate, as well as the condition of the premises and the teaching environment for pupils and staff.*' It is my experience that such benefits may be achieved with less impact on the environment. This being the case, the weight to be attached to a new build replacement school has not been proven and should not carry the significance that has been implied.

3.6. The current application has not updated its assessment of harms and benefits to account for changes in our understanding of climate impacts and the supply and demand model that underpinned the original application. This being the case, it is difficult to conceive how special circumstances can be justified. I would also argue that if the education and social benefits of the proposed scheme could be achieved by a more sustainable design strategy, then the significance claimed for the benefits of a fully new build replacement scheme in current circumstances should be substantially reduced. Either way, the appellant has not proven the case for a new build school as the only scheme that could deliver the claimed benefits. As such, the claimed benefits of the proposed scheme should carry little or no weight.

3.7. It is also noted by the Inspector in his report on the consented scheme, (para 59) that cost is not directly related to the planning merits: '… and if there is a funding gap which cannot be bridged, the permission will not come to fruition …' My interpretation of this assertion by the Planning Inspector is that it was clearly not his intention that the scheme as approved carried infinite weight at whatever cost to the climate and the environment.

4. Observations on the Proof of Evidence by Michael Olliff, Managing Director of Scott Brownrigg: proposed school design assessment dated 13 April 2017

4.1. As an up-to-date review of options has not been included within the current statement of case, I have returned to the original review of options presented at the previous appeal for which consent was achieved. (Appendix 5.3 in EPC Statement of Case) The Appellant argues that the case for the school option chosen at that time remains that the only viable way to deliver the benefits of the original consented plan is via a new build replacement school for 2000 pupils.

4.2. Para 2.1 of the report includes the statement: 'I appraise the only suitable and viable option that the school has available, which is to build a new school on Lodge Farm site.'

4.3. Para 2.6 refers to an appraisal of seven options '*that would address the failings of suitability, sufficiency and condition.'* using eight criteria: suitability, sufficiency, condition, value for money, accessibility, single site, playing fields and site area and planning risk. Costings are provided in support, prepared by Artelia UK. Each of the options is based on the existing school capacity of 1542 pupils and expansion to 2000.

4.4. I note that Para 3.2 records that Scott Brownrigg (SB) understand their appointment was in part due to its '*experience and understanding of the processes required to deliver a new Academy that is funded from the proceeds of enabling residential development.'* Thus, it appears that the desire and perhaps the decision in favour of a new build replacement to accommodate the school was a driving force behind the choice of architect, and that alternative, possibly more complex strategies were unlikely to be seriously considered or pursued.

4.5. Para 3.3 records: '*Upon my first visit to the school I visited the facilities and advised that it is obvious that the only option the school had to realise its ambitions was to provide a school on a new site.*' This would seem to cast reasonable doubt on whether the option of retaining and transforming the existing school estate, or continuing the current use of the site, has been (or indeed could be) objectively evaluated by this particular design team with this particular brief from the client.

4.6. The situation described in para 4.1 and 4.2 of expansion needs met by poorly integrated buildings in 'a piecemeal fashion' is extremely common with school, health and university estates. Any transformation (rather than new build replacement) project would also seek to address the existing estate comprehensively. Demolition and rebuild is of course easier and requires less complex planning and phasing, but transformation through renovation and repurposing with appropriate extensions can be successful. Examples cited in the CABE publication were:

- Stoke Newington School (Annex 1 p.7)
- Cleeve School Cheltenham (Annex 1 p.9)

- Baycroft School, Fareham. (Annex 1 p. 15)

4.7. Scott Brownrigg (SB) state in para 4.7: '*What this report will do however, is analyse in detail how the school is failing to meet legislative standards and that its inadequacies are continuing to adversely affect the users of the school on a daily basis. I will conclude that the suitability, sufficiency and condition is at a level of inadequacy that cannot be overstated and is therefore material in determining the need for a new school.'* Here and perhaps throughout the SB statement, the observations on inadequacy appear to be in support of an argument for investment and improvement, but not necessarily, as stated here, 'the need for a new school' It is always possible to overstate something.

4.8. It is my experience that many people, both industry professionals and clients and others new to design and construction, automatically assume that demolition and replacement must be, by default, a 'better' option than the retention and transformation of existing assets, often putting the decanting and demolition stage out of mind, as though it happens without impact overnight with negligible costs, and comparing a mental image of a 'shiny new' development with one of a badly maintained, 'failing' older building. Where the retention option is discussed, it is often affected by 'confirmation bias' - the tendency to use information in a way that confirms or supports prior beliefs or values. I suggest the statement of SB as above could be seen as an example of such confirmation bias.

4.9. Another potential example of such confirmation bias is evident in para 4.25 which comments upon a re-rating of the earlier Gleeds report which had initially prescribed the school buildings as in generally sound condition. As SB then note: '*Due to this review, the above statistics [the re-assessment by the Gleeds report] have significantly worsened and there [sic] school now has a predominant score of poor – bad.'* and includes a table with the title 'Recategorised suitability.' The key amendments that arose from this re-assessment of Gleeds initial report were subsequently used to downgrade the 'accessibility', 'functionality', 'environmental conditions' and 'safety and security' assessment across most of the departments in the school to justify the option for a replacement new build school. In Annex 10, I have attached a table challenging the degree to which the reasons make a compelling case for demolition or, in my opinion, merely confirm the bias that favoured the option for a new build replacement school.

4.10. Paras 4.26 to 4.3 of the SB Michael Olliff proof, go on to amplify the points made in the table in Annex 10, comparing the existing accommodation with a range of relevant regulations and guidance, and listing its shortcomings. However, this whole section of the statement and detailed analysis could be seen as an excellent starting point for transformation of the existing estate through refurbishment and repurposing. It does not in itself justify demolition and replacement, unless that is the only way of funding essential changes, but no evidence has been put forward to support this point and it is not something which appears to have been adequately explored.

4.11. Paras 4.98 to 4.99 of the SB (Michael Olliff) proof provide a further summary of the suitability and sufficiency issues already described. Para 4.89 states: ' *In summary, my analysis of the school against the EFA SoA [the Schedule of Accommodation*

(SoA) used by the EFA in BB103] shows that **the main footprint of the school could be sufficient for the age range and pupil numbers,** *[my emphasis] however the distribution of space and the restrictions on size, location and accessibility is such that the sub-headings of the SoA are not met, and this greatly restricts and inhibits the timetabling of the school and ability to maximise the school offering.'* In my opinion, whilst this might seem to be a reasonable assessment, it is not necessarily sufficient justification for demolition and replacement of the existing estate.

4.12. A desire to support the rationale for a new school building is apparent throughout the SB Michael Olliff proof of evidence. The term 'Woefully deficient' (4.99) may convey the author's passionate feeling about the perceived inadequacies of the existing school estate, but a more objective assessment with suitably precise descriptions would have been more appropriate. Indeed, the seven options reviewed are considered in such a manner that promotes preference for a new build option. The options are ranked in terms of 'key criteria' which are condition, suitability, sufficiency, value for money, accessibility; single site, playing fields and site area and planning risk. Criteria which were not all included then but which should now be considered wherever demolition is considered are:

- Embodied carbon
- Operational carbon
- Energy consumption
- Value for money
- Efficient use of land
- Phasing
- Future maintenance and replacement costs and environmental impact
- Impact on the business (in this case, the school) during construction and in the longer term
- Compliance with government policy with regard to the climate emergency
- Impact on all aspects of the local environment

4.13. Taking into account these factors, the balance of the planning argument may shift such that a consideration of harms arising from the new build option will be a material factor in deciding the significance to be attached to a new replacement school. At the same time, consideration of the weight to be attached to the benefits of a new build school as the only means to deliver the educational improvements, must be open to scrutiny and is at best unproven.

5. Summary Statement

5.1. I understand that EPC will present evidence to support its contention that SCC has already provided sufficient additional places and choice in the planning areas served by The Howard to meet in full its statutory obligations to provide a place in a good school for all children.

5.2. I understand that evidence will also be provided through ONS and School Operation Plans highlighting the substantial change in demand projections for school places. These declines, projected to continue into the 2030s, support the contention that there is no exceptional demand for places either now or in the next ten years that provides grounds to support very special circumstances.

5.3. My evidence supplements this case and argues that given such significant changes in circumstances, combined with the increasing emphasis to take account of the substantial harms to the environment and climate arising from new build projects, the appellant should have undertaken a fundamental and holistic review of its masterplan to identify the most cost-effective strategy to deliver the desired educational benefits. Taken as it stands, it does not present a fair and balanced assessment of benefits and harms today.

5.4. The appellant seeks to transfer the benefits arising from the previous consent and carry them forward to the current case without due consideration of changed circumstances.

5.5. It is my view that confirmation bias was likely to have been a driving force behind the initial appraisal of the existing estate, and thus the assessment of options, and it also may underpin the current drive to accept at face value benefits which no longer carry the same weight in the present circumstances, without suitable consideration of harms arising from the new build scheme.