**Objection Letter Template for Smallbrook Ringway Centre**

**August 2023**

To Whom It May Concern:

Re: Planning Application 2022/08496/PA for The Ringway Centre Smallbrook Queensway 1-4 Smallbrook Queensway Birmingham

I write to lodge my objection to the full application for the demolition of Smallbrook Ringway Centre and the erection of a 48-storey residential building (SBQ 3), and the outline application for the erection of two residential buildings (SBQ 1 and 2). This letter responds to the following recently submitted documents dated 21.07.2023 (unless otherwise noted);

* Whole Life Carbon Assessment
* WLCA Appendix 1
* WLCA Appendix 2 (dated 24.07.2023)
* WLCA Appendix 3
* Amended 19167\_Smallbrook-Queensway\_Residential Space Standards\_Jul 2023\_01
* 19167-SBQ-CWA-SBQ3-01-DR-A-2303-P-05 - SBQ 3 LEVELS 1 - 8

The submission of a ‘Design Stage Whole Life Carbon Assessment’reportis welcome but its submission so late in the process highlights the lack of concern for the climate crisis. The report raises a number of issues which further the case for the retention, adaptation and reuse of the existing building, and which mean that planning permission should be refused.

First, the report makes concerning claims about the proposed density of the proposal. Whilst there is no question that the housing crisis needs to be addressed through the construction of new homes, that does not mean that city centre developments should be built to the density proposed here – circa 1800 dwellings per hectare. The Housing Design Handbook advocates for tall buildings in the range of circa 350-600 dwellings per hectare, placing this proposal well above national standards. The proposal fails to address the local character of the site and the appropriateness of the proposal in that context, limiting publicly accessible amenity space and daylight at street level (the previously submitted visuals of the junction to Hurst Street have the sun shining from the north), and placing undue pressure on existing social and technical infrastructure.

Second, the report contains a number of assumptions but compares the carbon footprint or “Whole Life Carbon” (WLC) for one of the three proposed buildings with the alternative of retrofitting the existing building. The report uses the figure of 450 residential units without stating how that figure might be achieved within the existing building. The applicant’s calculations assume operational carbon is the same for both options. This is questionable, as retrofit may use less energy than operating the proposed 55-storey towers. Their assumption, however, in effect removes operational carbon from the WLC comparison, putting the focus on embodied carbon - ie the carbon footprint of demolition, construction and maintenance.

The document’s headline figures here are 911 kgCO2e/m2 embodied carbon for the new proposal, against 597 kgCO2e/m2 for retrofit. On these figures therefore demolition and rebuilding uses 53% more embodied carbon than retrofit. To give further context, the applicant’s 911 kgCO2e/m2 is 46% higher than the RIBA recommended maximum of 625 kgCO2e/m2 (2030 target). The applicant’s embodied carbon retrofit figure of 597 kgCO2e/m2 is “hypothetical” and, perhaps understandably, is not justified with a sufficient level of detail to enable meaningful comment; but it appears high when benchmarked against other best practice, e.g., the completed Entopia building (a retrofitted 1930s telephone exchange) used just 408 kgCO2e/m2.

The report introduces a strange comparison. As the existing building and retrofit would be smaller than the proposed towers, “the net difference of 1,350 new homes … would therefore mean greater levels of embodied carbon emissions.” Using this pretext, the applicant’s Table 1 reduces the 53% comparison above to 8%. This is at least highly questionable. For example, Birmingham City Council’s *Our Future City* plan refers to conversion of underused retail accommodation in the city centre. This is a welcome proposal which could provide new city centre homes more quickly, and with less embodied carbon than the proposed high-rise towers which will take fourteen years to complete. The equitable comparison should be per square metre of floor area.

A number of the applicant’s figures must be questioned. To give one example, although the narrative text of Turley’s report states “Demolition of the existing building including estimated diesel use, electricity use, and transport and processing of waste (hazardous and non-hazardous)” is included, it does not appear in their figures. If this were added, clearly the case for retrofit would be further strengthened.

In summary, the application should be refused on grounds that the applicants WLC report strengthens the case for retrofit of the existing building at a more appropriate density to the location, protecting this important and unique heritage asset for future generations.