

SUMMARY OF PROOF OF EVIDENCE

**SIMON STURGIS, ON BEHALF OF
SAVE BRITAIN'S HERITAGE**

456-472 OXFORD STREET, LONDON W1C 1AP

APPLICATION REF: 21/04502/FUL

APPEAL REF: APP/X5990/V/22/3301508

1. This proof sets out my expert evidence on the carbon emissions implications of a potential comprehensive retrofit of the existing buildings in comparison with the proposals for demolition of the existing building and the construction of a new building at 456 Oxford Street.
2. I set out the relevant policy framework and guidance, and consider the scheme in terms of compliance with national and local sustainability and climate change policies and the legal obligation of nationwide carbon reductions to Net Zero by 2050 as reflected in a range of other Government policies, guidance documents, and initiatives.
3. I conclude that the proposals for 456 Oxford Street requiring the demolition of a group of buildings (respectively 36, 52 and 90 years old) that are a viable carbon asset is entirely counter to the Government's Net Zero agenda, the GLA's carbon and circular economy policies, and Westminster City Councils carbon and circular economy policies. This is because it is entirely possible, based on my appraisal of the available information, for the existing buildings to be retrofitted, reorganised, and extended, for a significantly lower carbon cost than the carbon cost of new build.
4. I consider this approach has been superficially examined by the applicants, who have in their submitted application only presented a carbon assessment of a 'light touch refurbishment'. This is an option that was always bound to fail in a comparison with the new build option.
5. In summary, this Proof of Evidence will show that the proposed demolition and new construction at 456 Oxford Street is in direct opposition to the Government's Net Zero obligations and objectives and the aligned policies and commitments by all parties at all levels of decision making on this submission. These policies and commitments are consistently in favour of low carbon design, resource efficiency, prioritisation of retrofit and circular economic outcomes, but these policies and commitments have not been pursued for 456 Oxford Street.
6. On the basis of the above, I request that the scheme be refused planning permission.

27 September 2022