



## 1.0 Introduction

This addresses comments received from Waterman for the Bloomsbury Group, dated 11<sup>th</sup> September 2015, on the Energy Strategy and BREEAM Pre-Assessment, May 2015.

It should be noted that since the May 2015 reports quoted above, an updated BREEAM pre-assessment report was submitted in September 2015, in response to comments from Camden Council.

For clarity purposes, *comments from Watermans are marked here in italics*, and our response is indicated below each comment.

## 2.0 Energy Strategy and BREEAM Pre-Assessment

*Waterman's comment:* *Modelling has been undertaken in accordance with the Building Regulations 2010 'Part L2A Conservation of Fuel and Power in New Buildings other than Dwellings' 2013 Edition which is the appropriate methodology.*

Response: Noted

*Waterman's comment:* *The report states that the proposed development would achieve an estimated overall carbon emission reduction of 25% on Part L2A 2013 compliance levels. However, for new developments the carbon emission target should be a 35% reduction in CO2. This should be raised with the Council's Energy Officer. Because this is a change of use as opposed to a new build, options for improvement may be limited and so it may prove difficult for the proposed development to comply with Building Regulations. This being the case it would fail to comply with the requirements of Camden's Core Strategy Policy CS13..*

Response: this was discussed at a pre-application meeting with Camden Council's Energy Officer, 27<sup>th</sup> February 2015. Due to the refurbishment nature of the project and its specific constraints, it was agreed that the target should be viewed as a target to be achieved if possible, and that otherwise, justification would be provide in the Energy Strategy to demonstrate all reasonable efforts have been made. This is the approach that has been followed. Notes issued after the meeting are provided in Appendix.

*Waterman's comment:* *The consideration of the Fabric and Services, CHP and connection to District Heating are reasonable in our opinion though the practicality of connection to District Heating should be demonstrated. The use of ASHPs is accepted by the EU Directive as a low carbon (green) technology. Again these matters will need to be agreed with the energy officer at the Council.*

Response: Noted. Information has been provided on proposals for connection. Should further details be requested on its practicality, we suggest this be provided at detailed design, as a pre-start or pre-occupation condition.

*Waterman's comment:* *We cannot confirm the calculations and figures in the report because we don't have access to their energy model. However, they have followed the London Plan energy hierarchy and have provided what is needed for the local authority to assess the proposal.*

Response: Noted. No further information expected to be required.

*Waterman's comment:* *The Pre-Assessment Report concludes that the BREEAM score for the proposed development would be "Very Good". We have a number of observations that relate to the assessment approach, project definition and also with regard to some specific credit issues that have been targeted as part of the strategy:*

*BRE Projects BETA Website*



*The BRE Projects website provides the method by which the BREEAM assessment is set up and the score calculated. It requires a number of details to be included in order to develop a scoring spreadsheet for the specific building. Since initial release of the BRE's Projects website the percentage values and weightings for each credit section have been updated / changed and any bugs removed. It is therefore recommended that the project set-up process is re-visited to ensure that the percentage score targeted remains applicable.*

Response: Noted and agreed. An updated version of the pre-assessment was issued by the team in September 2015, which also demonstrates a possible route to a Very Good rating.

Waterman's comment: *In relation to the assessment of ecology, no soft landscaping is present on site due to the nature of the project. This has been entered in the 'Initial Details' tab that is completed to set up the assessment scoring tool. However, the LE 04 credit for Enhancement of Ecology has been included in the assessment strategy rather than being filtered out. This should be checked to ensure the correct credit issues are assessed for certification and therefore the correct assessment score provided.*

Response: Noted and agreed. This has been addressed in the updated version of the pre-assessment issued by the team in September 2015.

Waterman's comment: Simple Building classification

*The building has been classified for the purpose of the assessment as a 'Simple Building'. This is defined by the BRE as a building that, except for in localised circumstances, does not have air conditioning and refrigeration systems or mechanical ventilation, displacement ventilation, and complex passive ventilation. However, we understand that the Proposed Mechanical and Electrical Systems strategy for the building includes both mechanical ventilation and refrigeration systems. On this basis we consider it more appropriate for the assessment to follow the standard methodology rather than the guidance tailored for a 'Simple Building', which removes a number of criteria from the assessment.*

*If assessed as a 'Simple Building', the BREEAM score for the proposed development might be overestimated. If not assessed as a 'Simple Building', the score achieved for the project would be reduced and the targeted 'Very Good' rating may not be achieved.*

Response: Noted and agreed. This has been addressed in the updated version of the pre-assessment issued by the team in September 2015, which demonstrates a possible route to a Very Good rating.

Waterman's comment: *Overall, further justification of the carbon emission reduction of 25% on Part L2A 2013 compliance levels is required. The energy strategy in other respects appears reasonable although we have not been able to review the calculations and figures in the report because we don't have access to their energy model.*

Response: Preliminary Part L2A 2013 modelling was carried out by a Level 5 accredited modeller and used to support the energy strategy. It is not common practice to submit models as part of the planning documentation and we do not expect this to be required. We could provide additional information on request, if details were provided on what information is required.

Waterman's comment: *We also recommend that the BREEAM pre-assessment is revisited to provide assurance that a 'Very Good' rating can actually be achieved. It is therefore not clear whether the Council's sustainability targets and the requirements of Core Strategy Policy CS13 and of Development Policies DP22 and DP32 have been met.*

Response: Noted and addressed by the revised September 2015 BREEAM pre-assessment report.

### 3.0 Appendix – Notes from Pre-Application Meeting

**From:** Julie Godefroy

**Sent:** 15 March 2015 15:51

**To:** amy.farthing@camden.gov.uk

**Cc:** Ian Cowley <IanCowley@hoarelealea.com>; Ben Edwards (Ben.Edwards@criterioncapital.co.uk) <Ben.Edwards@criterioncapital.co.uk>; Hockin, Sophie (Bilfinger GVA) <Sophie.Hockin@gva.co.uk>; Alex McDougal <alex.mcdougall@camden.gov.uk>; Edmunds, Tom (Bilfinger GVA) <Tom.Edmunds@gva.co.uk>

**Subject:** RE: NCP Car Park, 112 Great Russell Street | Camden's pre-app response

Amy,

Thank you for your response. I thought our meeting notes had addressed your request, i.e. 'a summary of the items that will be included within the energy and sustainability assessments following our discussion, for us to confirm'. I have copied below our understanding, do let me know if you have any comments.

Kind regards

Julie

#### Energy strategy:

- Target improvement on Part L 2013: the team has undertaken initial Part L modelling and current results show approx. 25%. This falls short of the London Plan 35% but LBC accept flexibility for existing buildings. Information to provide in submission: Details of measures taken and why no more can be achieved will be included in the energy strategy report, including Part L modelling report setting out assumptions such as envelope U-values, system efficiencies, air source heat pump COPs etc.
- LBC accept that the scheme cannot be served by a boiler, as this would require a route for flues up the building through another party's demise. Information to provide in submission: The scheme's Part L performance will be compared with that of a scheme that would be served by gas boiler.
- District heating connection:
  - the project will have the ability to connect to future networks for space heating and domestic hot water, subject to the usual caveats (technical feasibility, viability etc) Information to provide in submission: arrangements will be described, including location of plate heat exchanger and interaction with systems currently proposed. Two options are being considered (direct feed via plate heat exchanger, or pre-heat for air source heat pumps): this is acceptable at this stage.
  - The team believe that existing Bloomsbury/British Museum and UCL networks are currently too far away (min 500m) for a connection to be viable. HL to review distances and contact the network operators to find out details if possible: any spare capacity, plans for expansion, and technical details such as operating temperatures and carbon content of heat. Information to provide in submission: Details of distances and correspondence.
- CHP: the team explained that this was discounted on the basis of the relatively small scale of the project, and the fact that it would require taking flues up the building. This was accepted by the planners, who also pointed out that CHP would not help with air quality issues on site. Information to provide in submission: justification summary for not including CHP.

#### BREEAM:

The team have carried out a pre-assessment showing 'Very Good' is achievable. LBC accept this is in line with policy, albeit there is a policy aspiration for 'Excellent'. Information to provide in submission: The pre-assessment report will provide a short justification where credits are not achievable.

**Julie Godefroy**

HOARE LEA  
SUSTAINABILITY

Tel +44 (0)20 3668 7100  
DDI +44 (0)20 3668 7198  
Mob +44 (0)7875 966 351