

Dempsey, Matthew

From: Gracie, Ian
Sent: 03 October 2016 11:13
To: Planning
Subject: FW: 3-6 Spring Place. Ref: 2016/5181/P. Energy and Sustainability.

Please log

Ian Gracie
Planning Officer

Telephone: 02079742507



From 1 October 2016 you will not receive a letter from us if your neighbour submits a planning application. You can still find out about planning applications:

- on new improved posters on lamp posts
- by signing up to [planning e-alerts](#)
- in the planning section of the [Camden Account](#)
- through adverts in the Camden New Journal and Ham & High

You can [sign up](#) to our new and improved planning e-alerts to let you know about new planning applications, decisions and appeals.

From: Lopez, Ana
Sent: 03 October 2016 10:38
To: Gracie, Ian
Subject: 3-6 Spring Place. Ref: 2016/5181/P. Energy and Sustainability.

Hi Ian,

Here are comments for this application. Any questions, let me know. Thanks.

Policy requirement: applicants must submit an energy statement showing how the development will meet the following policy requirements:

- Follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies set out in the London Plan (2011) Chapter 5 (particularly Policy 5.2) to secure a minimum 35% reduction in regulated CO2 emissions below the maximum threshold allowed under Part L 2013. GLA guidance on preparing energy assessments and CPG3 should be followed. [NOTE: Decentralised Energy Priority Areas are shown on [this map](#)]
- CS13 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement.
- Where the London Plan carbon reduction target cannot be met on-site, we may accept the provision of measures elsewhere in the borough or a financial contribution (charged at £90/tonne CO2/ yr over a 30 year period), which will be used to secure the delivery of carbon reduction measures elsewhere in the borough. Further information on this can be found [here](#).

Comments:

The overall stated savings are 16.5% from a Part L baseline - this misses policy targets. The applicant should investigate further opportunity to maximise carbon savings on site. Otherwise full justification should be provided on why it's not feasible and a carbon offset contribution will be sought through S106 to fund carbon reduction projects elsewhere in the borough. This is calculated as follows: 17.44 tCO2/year shortfall x £2,700 = **£47,088**.

Proposals achieve a 3.5% reduction at the 'Be Lean' stage. There are opportunities for the development to improve on the stated u-values and air tightness (CPG3 outlines Camden's targets for fabric efficiency which are more ambitious).

Proposals achieve a 13% reduction at the 'Be Green' stage through Solar PV and ASHP. 40 x PV panels (total area of 64 m²), inclined 15° around the perimeter of the array and 30° at the centre of the array (for maximum efficiency) proposed.

No CHP and no connection to DEN proposed - although the development lies within the Kentish Town area (priority area for potential network development) the applicant is not future proofing as the proposed heating system would not be compatible with a network. This is accepted.

No BRUKL reports have been submitted to support the energy statement.

Further actions for applicant:

Applicant should investigate further opportunities to achieve onsite carbon reduction. There may be further opportunities to improve fabric efficiency and introduce further solar PV. If this is not feasible then full justification should be given and **£47,088** to be secured through the S106 to fund carbon reduction projects elsewhere in the borough.

Applicant should submit BRUKL report to support stated savings.

Policy requirement: Applicants are also expected to submit [a sustainability statement](#) - the detail of which to be commensurate with the scale of the development showing how the development will:

- Implement the sustainable design principles as noted in policy DP22.
- Achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

Comments:

Proposals involve demolition and rebuild. The applicant has stated that the existing building quality is poor and that design won't allow for existing parts of the building to be reused. A Resource Management Plan will however be targeting > 80% waste to be diverted from landfill.

The assessment demonstrates that an 'Excellent' rating is achievable for the scheme, with an overall Credit score of 76.78% being sought.

Green roof is not proposed due to design reasons. Our policies require all Majors to incorporate green roof unless deemed unfeasible. The applicant should seek to incorporate a green roof into the design. A green roof can also be proposed in conjunction with solar PV.

Cooling hierarchy has been followed though no passive ventilation proposed due to site constraints.

Applicant should confirm if greywater and rainwater harvesting is proposed.

Further actions for applicant:

Applicant should seek to reuse existing building materials on site where possible.

Applicant should confirm if greywater and rainwater harvesting are proposed – requirement for all majors unless demonstrated to be unfeasible .

Recommended conditions (once we have a response about the above):

- Sustainability measures to be secured through S106 sustainability plan (Sustainability & Energy Statement, Martin Lawless of mTT/SUSTAIN Ltd, dated 16th September 2016) indicating Excellent rating and minimum credit targets in Energy (60%), Materials (40%) and Water (60%).
- Energy provisions to be secured through S106 EE&RE plan – total beyond Part L 2013 AND % reduction through renewables
- £47,088 for carbon offset contributions to be secured through S106.

Ana Lopez
Sustainability Officer
Culture
Supporting Communities
London Borough of Camden

Telephone: 020 7974 5011

Web: camden.gov.uk

5 Pancras Square
London N1C 4AG

Please consider the environment before printing this email.