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REF: 8081.003.008

8TH NOVEMBER 2016

Ian Gracie
London Borough of Camden
5 Pancras Square
Judd Street
London
WC1H 9JE

Dear Ian,

RE: 2016/5181/P 3-6 SPRING PLACE - RESPONSES TO PLANNING COMMENTS ON ENERGY AND SUSTAINABILITY

This letter has been provided in response to comments from the Sustainability Officer, Ana Lopez of the London Borough of Camden in an email dated 03/10/16 regarding the Energy and Sustainability Statement (ref. 8081.003.005, dated 16/09/16) submitted as part of the planning application for 3-6 Spring Place 2016/5181/P.

The purpose of this letter is discuss the applicant's stance on the comments made and 'Further Actions for Applicant' indicated, as shown below. The comments from the the Sustainability Officer are reproduced in italics below, using the colours use in her email.

We consider that the proposed energy strategy for the site is the most technically appropriate and the sustainability credentials of the scheme have been optimised.

ENERGY STATEMENT

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.

Applicant's Response

- The Applicant's design team have undertaken a full iterative analysis of building fabric options (including U-value selections and air tightness performance) for the building. The building specification summarised in the Energy Statements reflects the outcome of this exercise, which demonstrates that improved U-values or air tightness are counterproductive in energy and carbon terms in a highly serviced building such as that proposed, where energy demand is dominated by cooling energy use.
- The Applicant believes that the PV panel array indicated on the roof plan drawing provided within the Energy Statement indicates the full extent of the site to which panels could effectively be placed, taking into account access, roofline and overshadowing considerations. The report commentary on renewable technologies as a whole gives a thorough review of the feasibility of all commercially available technologies, in accordance with the requirements of the GLA Guidance Note and BREEAM NC 2014 Credit Ene 04 Low Carbon Design.
- The Applicant concurs that in these circumstances it is appropriate for the Borough to seek a carbon offset contribution of £47,088, secured through a S106 agreement to fund carbon reduction projects elsewhere in the Borough.
- The Applicant will submit a BRUKL report to support the stated savings within the Energy Statement as an appendix to an updated version of the Statement.

SUSTAINABILITY STATEMENT

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.*

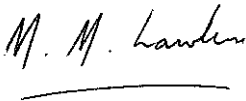
Applicant's Response

- As explained throughout the application submission documents, the existing buildings and structures on the site are largely in a poor condition and it is not suitable for existing materials to be reused within the proposed redevelopment scheme. As set out in our design rationale and the detailed Design & Access Statement, the proposals involve the use of high quality and site-appropriate building materials, replicating architectural examples in the immediate area, in a sensitive way.
- Water usages has been minimised on the proposed development via the use of low flow fittings as shown with the commitment to achieving the Wat 01 credit in the BREEAM assessment thus reducing the viability of a rain water harvesting strategy. The basement extents on the site has been minimised and its extents dictated by the railway, road and other

ground constraints; the basement is predominately used to provide cycle spaces and cyclists facilities (enabling and promoting sustainable travel to/from the site) and plant (to reduce the need to locate this on the roof) and space is not available for the additional plant required to accommodate a rainwater harvesting system. On this basis the Applicant does not intend to provide greywater or rainwater harvesting as part of the development.

- It is noted that there is now to be green roof provision to the site which will regulate temperature and hence improve the yield of the proposed solar PV system, as well as providing rainwater run-off reduction and biodiversity benefits.

Yours sincerely,



Martin Lawless

