

Energy and Sustainability Consultation Response

Scheme address	192-200 Camden (Buck Street) Market, Camden High Street, London , NW1 8QP
Planning reference number	2018/3553/P
Description of development	Continued use of land as a market, consisting of a ground plus two level container market (sui generis) comprising retail, restaurant/cafe, hot food takeaway and ancillary management / storage uses with associated stalls, partial roof canopy, landscaping, lifts, seating and servicing areas for a temporary five year period.
No. of residential units	0
Non-residential floor space (GIA m2)	900
Type of non-residential floor space	A1 - Shops Net Tradable Area (378), A3 - Restaurants and cafes (165), A5 - Hot food takeaways (290), Other (67)
Building regulations requirements	Assessed under L2A
Relevant documents for reference	"Buck Street Camden. Energy & Sustainability Strategy, Hoare Lea" "Design and Access statement, Urban Space Management Ltd July 2018"
Recommendation	Objection & Further information required

Nature of the scheme

A ground plus two level container market comprising retail (Class A1), restaurant / café (Class A3), hot food takeaway (Class A5) and ancillary management / storage uses with associated stalls, partial roof canopy, landscaping, seating and servicing areas for a temporary five year period.

No fixed heating or cooling services will be provided to the containers, with hot water being provided via an electric boiler in each unit. Drainage, water, electricity and potentially gas supplies will be provided for use by the tenants, but installations of white goods and water appliances will be by carried out by tenants, where required.

POLICY REQUIREMENT

MEDIUM NON-RESIDENTIAL NEW BUILD >500 sq.m GIA (AND DEEP REFURBISHMENTS) ASSESSED UNDER PART L2A

Applicants are usually expected to 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 the **maximum feasible CO2 reduction** beyond Part L 2013. GLA guidance on preparing energy assessments and CPG3 should be followed. In

particular, improvements should be sought on the minimum building fabric targets set in Part L of the building regulations

- CC1 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.

Applicants are also usually 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 CC2
- Achieve a BREEAM 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).

Building Regulations L2A appendix C para 2.b state that "For the purpose of the energy efficiency requirements, a temporary building with a planned time of use of two years or less is exempt. Portable or modular buildings, whether on one or more sites, which have a planned service life longer than two years, are not exempt."

Further it states that "Industrial sites, workshops and non-residential agricultural buildings are exempt only if they meet the low energy demand criterion. In other cases, such buildings must comply with energy efficiency requirements. Other buildings which have a low energy demand but do not fall into one of the above categories are not exempt."

The proposal is for a temporary 5 year period and is not "Industrial, workshops or non-residential agricultural" and therefore is not exempt.

As the development will have no fixed heating or cooling services provided to the containers then as a 'Non-exempt building with low energy demand' the requirement is that the building envelope should be insulated to a degree that is reasonable in the particular case.

Given that the shops and restaurants in the containers will be occupied by staff for a significant part of the day and contain goods (which will need to be protected from condensation or frost) and customers it is highly likely that tenants will use some heating appliances. As such it would be reasonable for the envelope to be insulated and as tenants are likely to provide heating this should achieve a U-Value of no worse than 0.7W/m².K.

Issue 1: Objection. The Containers should be insulated to at least 0.7W/m².K. Further information required. The applicant should reconsider the insulation and space heating strategy for the development for reasons of efficiency.

Design team response: The market is intended to be open air and open to the elements and, as with other open retail unit/stalls in Stables Market, individual tenants are not expected to provide individual heaters. In that vein, it is also not proposed to insulate the containers.

ENERGY STATEMENT


ENERGY HIERARCHY RESULTS: Not required.

Has sampling been used to model the carbon savings and is sampling representative?	Not required
Have the DER/ TER worksheets/ BRUKL report been provided?	Not required – see LA2 2.25 . However reasonable provision would be for every fixed building service that is installed to meet the energy efficiency standards set out in the 2013 edition of the DCLG Non-Domestic Building Services Compliance Guide.

BE LEAN:

Proposed specification:	
Building fabric u-values (W/m ² K)	<p>2. Building Regulations</p> <p>New A1, A3 and A5 retail spaces are assessed under Approved Document Part L2A Conservation of Fuel and Power 2013, which covers new, non-domestic, buildings.</p> <p>As no fixed heating or cooling services are to be provided, these units are considered to be <i>non-exempt buildings with low energy demand</i>. This is due to the fact there will be some fixed building services installed, e.g. lighting.</p> <p>There is no requirement under Part L2A for an energy model or calculation to be undertaken to confirm compliance with Building Regulations.</p> <p>The only energy efficiency requirements placed on the units are as follows:</p> <ul style="list-style-type: none"> - Any fixed building service, including lighting, to be provided by the tenant would need to be installed to meet the standards set out in the 2013 DCLG <i>Non-Domestic Building Services Compliance Guide</i>. - If some fixed heating is provided, in the form of radiant or panel heaters (by tenants), then the building fabric must achieve a U-value of no worse than 0.7 W/m²K.
Air permeability (m ² /hr/m ²)	Not applicable
Glazing %	<p>Issue 2: Information required on the proposed glazing. There is no mention of glazing despite the initial designs in the Design and Access statement indicating potential areas of glazing of the containers.</p> <p><i>Design team response: Single glazing is proposed in line with 'usual' shop front design.</i></p>
Low carbon technologies and building services	<p>The Energy and Sustainability strategy states that <i>"With regards to energy consumption, there is the opportunity for tenants to specify energy efficient appliances as part of their fit out. Below are some examples of measures which could be considered as part of the fit out:</i></p> <ul style="list-style-type: none"> - All small power and plug in equipment to be energy star certified. - All internal lighting to be dedicated energy efficient with occupant controls. - All timber to be FSC certified or similar - Paints and varnishes to be low VOC - Kitchen taps with a flow rate of 6 litres per minute at 3 bar pressure <p><i>These sustainability measures will be discussed with the tenants to confirm which of these can be implemented during the fit out of the individual spaces."</i></p> <p>Issue 3: Given the lack of fixed heating and cooling this should be a requirement. The tenants should be required as part of their tenancy agreements to specify energy efficient appliances.</p> <p><i>Design team response: Noted, and this will be included in the lease for tenants.</i></p>

BE CLEAN:

Connection to an existing decentralised energy network:	
Proximity to existing decentralised energy networks and proposals to connect	Not applicable
Future proofing:	
Opportunities to connect to a future network	 <p>The site is on the border of the cluster study area identified by Camden's Reference Document 'Borough Wide Heat Demand and Heat Source Mapping, London Borough of Camden, 15 May 2015, Revision 03'.</p> <p>Issue 4: Sites within 1km of a potential network should future proof unless demonstrated to be unfeasible.</p> <p>Future proofing details required include:</p> <ul style="list-style-type: none"> • Confirmation that the development is within 1km of a potential network • Floor plan of energy centre and layout of plant demonstrating safeguarded space for a future heat exchanger. • Confirmation that provision for external buried pipework routes from plant room to property boundary closest to expected route of network have been safeguarded. Details of these proposed pipe routes and connection points should be provided • Details of provisions made in the building fabric/ design (such as soft-points in the building plant room walls) to allow pipes to be routed through from the outside at a later date • Details of provision of domestic hot water isolation valves to facilitate the connection of an interfacing heat exchanger. • Triggers for connecting to a wider network (i.e. when a network becomes available or a particular date) <p>Design team response: There is no energy centre proposed for the site, nor any site-wide services for heating or hot water. Further the network mentioned above is potential only, i.e. not yet constructed at the time of writing. A connection to potential future district energy will be re-considered at such a time as the site will be redeveloped for a permanent situation.</p>
On-site CHP	
Suitability for on-site CHP	Not considered

BE GREEN

A robust renewable energy feasibility assessment has not been completed.

Proposed technologies:	
Solar Thermal	Not considered
Solar PV:	<p>Discounted.</p> <p>The Energy and Sustainability statement states that “Due to the temporary nature of the development, and the fact no permanent heating or cooling will be provided, the technology most suitable to the development would be PV panels. However, as the development has only a light-weight, partial roof, it is not considered feasible to incorporate PVs.”</p> <p>Issue 5: Please investigate potential for PV capacity further. It is expected that there will be a high demand for electricity at the site as no fixed heating or cooling services are provided. It would be expected that PV could be mounted on the steel containers.</p> <p>The market is intended to be open air and open to the elements, in line with other open retail unit/stalls in Stables Market and, as there will be no heating or cooling provided, and cooking is expected to be by means of gas, it is not expected that electricity demand will be high. It is therefore not expected that the added cost and complexity of incorporating PVs into the design can be justified for the development.</p> <p>In order to further ensure that energy consumption on-site is limited, the design team may consider restricting the power available to each unit.</p>
GSHP	Not considered but unlikely to be suitable as the Building will not be well insulated and compatible with low temperature heating including underfloor heating. Further it is noted in the Design and Access statement that due to the presence of underground air raid tunnels and Northern Line tunnels “the method of installation that avoids the need for excavation or piling.”
ASHP	Not considered
Biomass:	Not considered
Wind:	Not considered

SUSTAINABILITY PLAN

Summary of proposed measures	
BREEAM rating	Not applicable.
Cooling hierarchy 1. Minimising internal heat generation through energy efficient design 2. Reducing the amount of heat entering the building in summer 3. Use of thermal mass and high ceilings to manage the heat within the building: 4. Passive ventilation: 5. Mechanical ventilation:	<p>Issue 6: Overheating concern / lack of information provided.</p> <p>The Energy and Sustainability statement states that “no permanent heating or cooling will be provided”. All development should demonstrate that measures to adapt to climate change have been implemented and that overheating risk has been managed.</p> <p>Design team response: Most containers will have fully opening fronts to allow air to permeate through them in summer. Ventilation extract will also be provided to kitchens. The retail areas are in effect open stalls under a container roof umbrella, and thus an outdoor/indoor feel is expected. It is expected that occupants will take a flexible approach to thermal comfort by way of dressing for the situation, just as is done elsewhere at Camden Market, and other outdoor, unheated/uncooled markets.</p>
Materials, sourcing and waste	The market will be constructed from “Repurposed shipping containers” and “has an additional benefit in that the structures can be dismantled and relocated at the expiry of the temporary period.”
Green infrastructure and biodiversity (including green/brown roofs)	Not considered
Water efficiency and SuDS (including rainwater and greywater harvesting)	<p>The Energy and Sustainability statement states that ‘<i>The WC area will be fitted out with water-efficient appliances in line with the requirements for a 25% reduction in potable water consumption, as detailed within BREEAM New Construction 2018:</i></p> <ul style="list-style-type: none"> – <i>WC’s with an effective flush of 4 litres</i> – <i>Wash hand basin taps with a flow rate of 6 litres per minute at 3 bar pressure</i>’ <p>Issue 7: rainwater/greywater harvesting systems should be actively investigated.</p> <p>Design team response: landscaping its predominantly hard surface timber decking on the upper floors, and tarmac on the ground. There would be some scattered planters, however not enough to warrant rainwater harvesting for irrigation purposes. Filtering and pumping of rainwater and/or greywater for use in WC areas would be an expensive and impractical solution for this temporary development. This will be reinvestigated once/if the site is redeveloped for a permanent situation.</p>
Building Management Systems, metering, monitoring and management	<p>Issue 8: Information required on metering. Details required of method of separate metering of tenants which incentivises individuals to manage their energy use effectively. This is particularly important to encourage the specification of energy efficient appliances (see Issue 3).</p> <p>Design team response: Meters for electricity and water consumption will be fitted to each lettable unit. Meters will also be fitted to the main income and the landlords lighting supply. External stalls are small, and potentially transient in nature, with only small energy consumption expected, and it is not proposed to fit meters to these.</p>

FURTHER ACTIONS FOR APPLICANT

See issues in red above which highlight action points.

Design team response: Each point addressed in turn above.