

Camden Council Planning Department  
 c/o DP9 Ltd  
 100 Pall Mall  
 London  
 SW1Y 5NQ

17<sup>th</sup> December 2018

To Whom It May Concern,

**Re: Proposed Extension to the Mercure Bloomsbury – Sustainability**

This second note has been produced to respond to further comments from the Local Planning Authority in relation to sustainability and energy issues received on 3<sup>rd</sup> January 2019.

LPA Comment ('Issue 1'): It is accepted that the BRUKL report is not able to be provided for this building however given that this is to be assessed against L2B then the issue of consequential improvements referred to in Issue 3 must be addressed.

LPA Comment ('Issue 3'): Further Action is required: given that this is to be assessed against L2B then the issue of consequential improvements set out in section 6.3 of L2B need to be fully addressed, specifically those in table 6.

Table 6 of Part L2B is provided to the right. There is little or nothing that can be done to the existing structure (thermal elements) due to its appearance and location in the conservation area. The extent of potential M&E improvements to the existing building can only be confirmed once a fully M&E survey has been undertaken and any identified opportunities costed. This survey will also inform the final M&E design for the proposed building extension. The existing sustainability report confirms that many of the existing cooling/air handling units to the rear of the building will need to be replaced / upgraded, for example. It is therefore proposed that, if planning permission is granted, this element is conditioned such that a report from the M&E consultant detailing the technically viable, practical and economically

**Table 6 Improvements that in ordinary circumstances are practical and economically feasible**

*Items 1 to 7 will usually meet the economic feasibility criterion set out in paragraph 6.5. A shorter payback period is given in item 8 because such measures are likely to be more capital intensive or more risky than the others.*

No.	Improvement measure
1	Upgrading heating systems more than 15 years old by the provision of new plant or improved controls
2	Upgrading cooling systems more than 15 years old by the provision of new plant or improved controls
3	Upgrading air-handling systems more than 15 years old by the provision of new plant or improved controls
4	Upgrading general lighting systems that have an average lamp efficacy of less than 40 lamp-lumens per circuit-watt and that serve areas greater than 100 m <sup>2</sup> by the provision of new luminaires or improved controls
5	Installing energy metering following the guidance given in CIBSE TM 39
6	Upgrading <b>thermal elements</b> which have U-values worse than those set out in column (a) of Table 5 following the guidance in paragraphs 5.12 and 5.13
7	Replacing existing windows, roof windows or rooflights (but excluding display windows) or doors (but excluding high-usage entrance doors) which have a U-value worse than 3.3 W/m <sup>2</sup> .K following the guidance in paragraphs 4.23 to 4.28
8	Increasing the on-site low and zero carbon (LZC) energy-generating systems if the existing on-site systems provide less than 10% of on-site energy demand, provided the increase would achieve a simple payback of 7 years or less
9	Measures specified in the Recommendations Report produced in parallel with a valid Energy Performance Certificate

feasible improvement options be provided to the LPA. An approach for demonstrating these have been undertaken / implemented can also be agreed.

**LPA Comment ('Issue 2'): Further action: The following should be secured by condition or legal agreement obligation for approval prior to implementation:**

- Revised Sustainability statement incorporating the outcome of the full M&E design scenario
- CO<sub>2</sub> savings should be maximised and any shortfall to 35% should be offset by a contribution (£1,800/tCO<sub>2</sub>)

From the Applicant's perspective this approach is agreed – the full M&E design detail can be provided in due course once undertaken and where shown to be viable, and at that point the calculation for the carbon offset fund can also be finalised, subject to receipt of the approved calculation methodology for building extensions.

**LPA Comment ('Issue 4'): Further Action: A further amendment of BREEAM pre-assessment to take into account the heat pumps and other changes and to target all available credits is required.**

The timescales permitted to provide an updated BREEAM response are insufficient to enable this to be provided by 4<sup>th</sup> January 2019. Irrespective of this, an updated BREEAM 'pre-assessment' that is sufficiently robust in terms of underpinning evidence will not be possible until the full M&E survey and design work is undertaken; the same work which has been described in response to Issues 1, 2 and 3 above. The process is also far more complex than implied by the LPA comment – this is an extension to an existing building which does not fall under Part L2a, and which will still likely be fully assessed under BREEAM New Construction 2018. The calculations and details are complex and cannot be quickly undertaken.

As is usual at planning phase, therefore, a number of assumptions have had to be applied. These will be firmed up in due course but inevitably it is not possible to comply fully with the LPA's request at this stage of the process. Moreover, the constraints of this site – many of which are outside the control of the Applicant - are significant and we also therefore question the appropriateness of applying BREEAM at all. We cannot legitimately therefore advise that any BREEAM target other than that already stated can be achieved.

The above notwithstanding, the Applicant would be happy to share all the necessary evidence of the opportunities and approach to BREEAM in due course to establish that all reasonable and practical effort has been made to achieve relevant credits, and for the LPA to better understand all the constraints and issues arising.

**LPA Comment ('Issue 5') [Biodiverse Roof] – to be dealt with through condition**

The Applicant agrees with this approach.

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We hope this clarifies our approach in relation to the additional comments. Again, wherever possible and within the significant constraints of this site, the applicant will seek to meet the requirements of LB Camden planning policy and will be happy to share detail of design, thinking, development processes and other evidence as required to demonstrate this.

Yours sincerely

Philip Jackson  
Director  
Daedalus Environmental Limited