

## Laura Hazelton

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**From:** Allen Sacbucker <Allen@smplanning.com>  
**Sent:** 25 May 2021 10:00  
**To:** Laura Hazelton  
**Cc:** Stuart Minty; Louis Brewer  
**Subject:** 2020/3043/P - 52 Tottenham Street - sustainability matters

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Hi Laura,

Thank you for meeting with us a couple of weeks back, it was very helpful and appreciated.

As discussed, with regard to sustainability matters raised in the GLA response to the application, please find specific commentary below, explaining why the suggested requirements are unrealistic in the context of this site (although appreciate we may have moved on from this position since).

To provide some context, firstly, the application is for four residential units (zero uplift) and in planning terms, is classed as a minor application. Secondly, the application site is severely constrained by the narrow width of the plot and the need to re-provide employment floorspace at ground floor level which, from a feasibility perspective, limits the layout and therefore, the scope for sustainability measures.

Notwithstanding the above, the proposal incorporates a range of sustainable design and construction features including a highly thermally efficient building fabric; air source heat pumps for the upper flat and commercial space; highly efficient lighting; water saving sanitary fittings and appliances to deliver a water efficient development; the use of materials with a low lifecycle environmental impact and embodied energy and efficient construction and operational waste management. In addition, the inclusion of energy efficiency measures has been discussed to minimise on-site energy use compared to a building regulation compliant design. These include improved insulation levels, high specification glazing and energy efficient lighting and appliances and results in a 20% reduction in carbon emissions beyond Part L of the Building Regs 2013.

The GLA report comments as follows, with a specific response provided for each:

The information revealed that neither the domestic or commercial element of the proposed development appear to achieve any carbon savings from energy efficiency alone compared to a 2013 Building Regulations compliant development. The applicant should therefore model additional energy efficiency (EE) measures and aspire to meet the EE targets.

The intent of the comment is appreciated and a matter we always aspire to achieve but as above, the site is severely constrained and further savings are not particularly possible. For context, the size of the site and the proximity of neighbouring properties limits the orientation options with glazing being located on the southern side. Balconies and louvres will however provide a degree of solar shading; limiting solar gains.

In terms of carbon dioxide savings, the proposed figure appears to fall short of the on-site target within the London Plan. However, it is acknowledged that there is little further potential for carbon dioxide reduction on-site.

Acknowledgement that there is little further potential for carbon dioxide reduction on site is welcomed. Furthermore, it is noted that the London Plan 35% target is for major applications, which this is not. And the project meets the local policy target of 20%.

In terms of renewable energy technology, it is expected that the development maximises on-site renewable energy generation and this is regardless of whether the minimum on-site carbon dioxide emission improvement target has already been reached through earlier stages of the energy hierarchy. It is suggested that the applicant reinvestigate the inclusion of renewable technologies.

Various renewable energy options have been explored including biomass systems, micro hydro power, micro wind power, water and ground source heat pumps and solar systems but none of these are suitable in the context of the site constraints. However, there is potential to include air source heat pumps but this is also restricted by the limited space at roof level for associated plant and so is proposed to serve only the uppermost flat.

The applicant should provide details demonstrating how that scheme meets the Urban Greening Factor (UGF) target of 0.4 for predominantly residential development.

Urban greening is similarly difficult to achieve based on the site constraints in this instance. A green roof, for example, is restricted by the need to provide plant in achieving renewable energy technology and in any case, the London Plan states that ‘the UGF is currently only applied to major applications, but may eventually be applied to applications below this threshold as boroughs develop their own models’.

To determine how the proposal will aim to achieve circular economy outcomes and aim to be net zero-waste, a circular economy statement should be submitted prior to the determination of the application in accordance with Policy S17 of the Publication London Plan. The statement should demonstrate a commitment to achieving targets for reusing/recycling/recovering, provide a notification of the likely destination of all waste streams (beyond the Materials Recycling Facility) and submit a written confirmation that the destination landfill(s) has/ have the capacity to receive waste.

Firstly, it is worth noting that the circular economy policy of the London Plan is engaged only on referable applications. I appreciate that our application was referable but in context this was due to a marginal exceedance of the height of the building. Residential applications are otherwise only referable if they exceed 150 units. Our application is for 4 (0 uplift) and so the necessity for a Circular Economy Statement is somewhat onerous and it is thought that officers could use their discretion, given the circumstances, and proceed without.

We would welcome your thoughts.

I hope the above is clear but please do let me know if you require any points of clarification or have any questions.

Many thanks  
Allen

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