

Date:
10.08.2017

Attention:
London Borough of Camden

Our reference:
1930

To whom it may concern,

RE: Energy and Sustainability Consultation Response 176 Prince of Wales Road

Relevant documents for reference:

- *Energy and Sustainability Consultation Response*, issued by the Camden Council.
- *Preliminary Assessment BREEAM 2014 refurbishment & Fit Out*, prepared by Ben Holmes of Eight Associates, and dated 13/12/2016.
- *Energy Assessment*, prepared by Oliver Morris of Eight Associates and dated 12/12/2016.
- *Thermal Comfort Analysis*, by Niccolò Vicarelli of Eight Associates, and dated 12/12/2016.

On behalf of our client we would like to make the following formal responses to your comments (contained in the *Energy and Sustainability Consultation Response*).

Comment 1: *The BRUKL shows that the carbon savings are not below to TER. The applicant should confirm if further measures are possible to reduce carbon emissions further, in particular incorporation of on-site renewable technologies.*

As this project will be required to comply with Building Regulations Approved Document Part L2B the TER stated in the BRUKLs is not applicable. In accordance with current guidance the TER has been modeled in the 'baseline' scenario. The BER stated in the BRUKL on page 29 of the Energy Assessment (44.9 kgCO₂/m².annum) is effectively the building's TER. Both the 'be lean' (29.8 kgCO₂/m².annum) and the 'be green' (29 kgCO₂/m².annum) elements of the energy hierarchy have significantly improved upon this figure. It is not possible to incorporate any additional on-site renewable technologies (ASHPs are already specified) due to constraints imposed by the listed status of the building.

Comment 2: *Applicant should confirm if further improvements to building fabric and air tightness are possible.*

The proposed U-values have improved significantly on the minimum values stated in Part L2B, this includes insulating the existing external walls. It is not possible to make any further improvements as this will increase the risk of interstitial condensation. It is not possible to improve on the air permeability as there is free flow of air between the existing building and the new refurbished and extended element. It is not possible to improve the air tightness of the existing building due to constraints imposed by retention of the original fabric and the listed status of the building.

Comment 3: *The scheme is not policy compliant, therefore the applicant should endeavour to achieve BREEAM Excellent. Where this is not possible, the applicant should outline which credits cannot be achieved and justify why.*

A revised BREEAM Preliminary Assessment has been produced outlining a commitment to achieve an Excellent rating. Where credits are not targeted full justification has been provided. The scheme will achieve the policy targets of at least 40% of the Materials credits and 60% of the Water credits; however, it is not possible to target at least 60% of the energy credits due to constraints imposed by the listed status of the building.

Yours sincerely,



Ben Holmes