

**From:** [Martin Jones](#)  
**To:** ["Timms, Graham @ London HH"](#)  
**Cc:** [Roberts, Steven: PC-Plan](#)  
**Subject:** RE: 3188 Draycott Avenue post stage 1 energy comments  
**Date:** 30 October 2013 14:00:38

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Graham, Steve

The last outstanding energy item for this scheme was for the applicant to provide tables of carbon emissions and savings at each step of the energy hierarchy to allow the GLA to assess performance against the carbon reduction targets set in Policy 5.2. I've now received approval of this information from our energy advisors, as follows:

"The tables in the correct format have been provided and confirm that:

- The Clearings site follows the energy hierarchy and achieves an overall 26% carbon saving which is compliant with Policy 5.2. No further information required.
- The Marlborough school and commercial building (considered together for the purposes of checking compliance with Policy 5.2 as these were covered by a single energy statement at stage 1) follow the energy hierarchy and achieve an overall saving across the site of 3.4%. It is accepted that opportunities for savings on site have been optimised.

For the Marlborough school and commercial building site the applicant should discuss with the local authority a cash in lieu contribution for the shortfall in carbon savings (to be calculated according to the guidance given here:

<http://www.london.gov.uk/sites/default/files/Energy%20Planning%20Guidance%20update%20%2C%20Aug%202013.pdf>)"

Thanks

Martin

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**From:** Timms, Graham @ London HH [<mailto:Graham.Timms@cbre.com>]  
**Sent:** 25 October 2013 16:43  
**To:** Martin Jones  
**Cc:** 'Steven.Roberts@rbkc.gov.uk'  
**Subject:** RE: 3188 Draycott Avenue post stage 1 energy comments

Martin

Thanks for passing on the further comments from your energy advisers, which we have reviewed and discussed with Arup (JL's sustainability advisers for this project).

Arup advise that the information we have already provided is set out in the same format as for a number of other energy statements they prepared, which were previously submitted to and accepted by the GLA. Notwithstanding this, Arup have as requested prepared tables (attached) of carbon emissions and savings in the format given in the 2011 GLA Guidance on preparing energy assessments.

We are however strongly of the opinion that these sites should not be considered as a single site and that all data should be presented separately for each site, as we have done and as agreed to date.

Please let me know if you have any further queries.

Kind Regards

Graham

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**From:** Martin Jones [<mailto:Martin.Jones@london.gov.uk>]  
**Sent:** 14 October 2013 11:58  
**To:** Timms, Graham @ London HH  
**Subject:** RE: 3188 Draycott Avenue post stage 1 energy comments

Hello Graham

I've received the following comments from our energy advisors. This is one of the key strategic aims of the GLA so we do need to meet these requirements. If we could first establish what the reduction is, we can then tackle the issue of contributions to the Borough.

*The applicant has not provided completed versions of Tables 1 and 2 from the GLA Guidance on planning energy assessments for the whole development. This is required to determine the regulated CO2 emissions and savings at each stage of the energy hierarchy (these tables are required regardless of the percentage target which applies to the development and are included in the 2011 version of the guidance).*

*While it is accepted that the 25% target applies to this development and the residential element is aiming for Code level 4, it is not at all clear from the information provided that a 25% reduction will be achieved across the site as whole. Indeed for the New Marlborough School element of the development only a 2.3% reduction is envisaged from the combined effect of energy efficiency and PV. This strongly suggests that the development will not meet the 25% reduction across the site and a cash-in-lieu contribution relating to the shortfall in meeting the 25% target will need to be negotiated in liaison with the borough. To determine the extent of any shortfall, it is essential that completed versions of Tables 1 and 2 are provided.*

Thanks

Martin

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**From:** Timms, Graham @ London HH [<mailto:Graham.Timms@cbre.com>]  
**Sent:** 02 October 2013 11:22  
**To:** Martin Jones  
**Cc:** "Steven.Roberts@rbkc.gov.uk" ([Steven.Roberts@rbkc.gov.uk](mailto:Steven.Roberts@rbkc.gov.uk))  
**Subject:** RE: 3188 Draycott Avenue post stage 1 energy comments

Martin

We've reviewed your outstanding queries in relation to carbon savings at the Clearings and New Marlborough School/commercial building schemes as set out in your e mail (below) of 20<sup>th</sup> September. We set out our response as follows:

- 1) We welcome the confirmation that enough information has been provided to understand the site constraints and that opportunities on site have been optimised. In this context, we question the need to provide the additional information requested. The additional analysis and re-formatting of information necessary to do this will require a significant amount of work and will not alter the conclusions we have already presented. We also note, as set out in paragraph 1.5 of this document, that the September 2013 GLA Guidance is intended to provide further information on the introduction of the 40% improvement on 2010 Building Regulations target and (as also acknowledged in the response to point 3 below) this will apply to Stage 1 applications received by the Mayor on or after 1st October 2013. We don't therefore consider this guidance to be applicable to this current planning application.
- 2) The base case for the commercial building as modelled in Arup's Energy Strategy was based on air source heat pumps as gas boilers with conventional cooling was not a feasible option. However, for completeness, Arup have re-run the commercial building energy model with gas boilers. This gives exactly the same carbon footprint for the commercial building as the base case with air source heat pumps (ASHPs). This is 16.6 kgCO<sub>2</sub>/m<sup>2</sup>/yr (as set out on page 8 of the Energy Strategy). On this basis, there is no carbon saving for the switch from gas boilers to air source heat pumps in the notional building base case for this particular project and so the saving for moving from gas boilers to ASHP is 0%.
- 3) Please refer to our comments on (1) above which we also consider to be applicable to this request.

Please let me know if you have any queries.

Thanks

Graham

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**From:** Timms, Graham @ London HH  
**Sent:** 20 September 2013 17:01  
**To:** 'Martin Jones'  
**Cc:** 'Steven.Roberts@rbkc.gov.uk' ([Steven.Roberts@rbkc.gov.uk](mailto:Steven.Roberts@rbkc.gov.uk))  
**Subject:** RE: 3188 Draycott Avenue post stage 1 energy comments

Martin

Thanks. I've forwarded your queries to Arup (JL's sustainability advisers) and we will respond shortly.

Kind Regards

Graham

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**From:** Martin Jones [<mailto:Martin.Jones@london.gov.uk>]  
**Sent:** 20 September 2013 11:44  
**To:** Timms, Graham @ London HH  
**Cc:** 'Steven.Roberts@rbkc.gov.uk' ([Steven.Roberts@rbkc.gov.uk](mailto:Steven.Roberts@rbkc.gov.uk))  
**Subject:** RE: 3188 Draycott Avenue post stage 1 energy comments

Graham

Thanks for your further information. Please see the comments below from our energy advisors. I think we're almost there, although a little further information is required:

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Please see below in blue comments against the applicant's responses to our earlier queries.

Marlborough School

- 1) Figure 4 of Arup's Energy Strategy shows that all available roof area that is not being used for external play shall be given over to the provision for PVs. We attach 3 animations that show the self-shading of the 'purple' area

identified as unsuitable for PVs in the Energy Strategy during different times of the year. You will note that other than peak summer, this area receives a disproportionate amount of shading in comparison to the other aspects of the roof. This is why we have not considered it for the installation of PVs

Enough information has been provided to understand the site constraints and it is accepted that opportunities on site have been optimised. In order to clarify the carbon savings achieved on site and shortfall to be offset the applicant should provide tables (combining the school and the office) of carbon emissions and savings in the format given in the GLA Guidance on preparing energy assessments (September 2013) (<http://www.london.gov.uk/sites/default/files/Energy%20Planning%20Guidance%20update%20%2C%20Aug%202013.pdf>) (Tables 1-3).

2) Given the GLA recognises air source heat pumps (ASHPs) as a renewable energy source and this is also our base case, we have therefore not modelled any savings associated with a gas fired boiler system, which was discounted from the outset. We would question the necessity of amending the energy modelling to do this.

The carbon savings associated with development at each tier of the energy hierarchy need to be reported to the Mayor. In order to do this, a consistent methodology needs to be applied for all developments.

#### The Clearings

3) We are committing to a carbon reduction of 25% to achieve Code for Sustainable Homes Level 4. This accords with part B of policy 5.2 (minimising carbon dioxide) of the London Plan. We do not therefore consider there is a shortfall in CO2 reduction that needs to be met off-site. We do note that the detailed wording of this policy is somewhat ambiguous insofar as it sets 2 different targets for carbon dioxide emissions (in terms of minimum improvements over 2010 building regulations) for the year 2013, i.e. 25% for 2010-2013 and 40% for 2013-2016. Arup did seek clarification on this particular point earlier this year and were advised by Celeste Giusti (Senior Strategic Planner - London Plan Team) on 22<sup>nd</sup> April 2013 that The Mayor will only apply the higher target to Stage 1 applications submitted to the Mayor on or after the 1st October 2013. The 25% target is therefore still applicable to this scheme and we meet this.

It is accepted that the target applicable to this development is a 25% saving against Part L 2010, however in order to clarify the carbon savings achieved and whether the target has been met the applicant should provide tables of carbon emissions and savings at each stage of the energy hierarchy (for the domestic and cleaning facility combined) in the format given in the GLA Guidance on preparing energy assessments (September 2013) (<http://www.london.gov.uk/sites/default/files/Energy%20Planning%20Guidance%20update%20%2C%20Aug%202013.pdf>) (Tables 1-3)

Thanks

Martin

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**From:** Timms, Graham @ London HH [<mailto:Graham.Timms@cbre.com>]  
**Sent:** 16 September 2013 10:06  
**To:** Martin Jones; 'Steven.Roberts@rbkc.gov.uk' ([Steven.Roberts@rbkc.gov.uk](mailto:Steven.Roberts@rbkc.gov.uk))  
**Subject:** RE: 3188 Draycott Avenue post stage 1 energy comments

Steve/ Martin

Our project team has reviewed the additional queries raised in the e mail below in relation to energy which arise from our response to the GLA Stage 1 report. We can respond to each of these in turn as follows:

1) Figure 4 of Arup's Energy Strategy shows that all available roof area that is not being used for external play shall be given over to the provision for PVs. We attach 3 animations that show the self-shading of the 'purple' area identified as unsuitable for PVs in the Energy Strategy during different times of the year. You will note that other than peak summer, this area receives a disproportionate amount of shading in comparison to the other aspects of the roof. This is why we have not considered it for the installation of PVs

2) Given the GLA recognises air source heat pumps (ASHPs) as a renewable energy source and this is also our base case, we have therefore not modelled any savings associated with a gas fired boiler system, which was discounted from the outset. We

would question the necessity of amending the energy modelling to do this.

3) We are committing to a carbon reduction of 25% to achieve Code for Sustainable Homes Level 4. This accords with part B of policy 5.2 (minimising carbon dioxide) of the London Plan. We do not therefore consider there is a shortfall in CO2 reduction that needs to be met off-site. We do note that the detailed wording of this policy is somewhat ambiguous insofar as it sets 2 different targets for carbon dioxide emissions (in terms of minimum improvements over 2010 building regulations) for the year 2013, i.e. 25% for 2010-2013 and 40% for 2013-2016. Arup did seek clarification on this particular point earlier this year and were advised by Celeste Giusti (Senior Strategic Planner - London Plan Team) on 22<sup>nd</sup> April 2013 that The Mayor will only apply the higher target to Stage 1 applications submitted to the Mayor on or after the 1st October 2013. The 25% target is therefore still applicable to this scheme and we meet this.

We trust this response addresses these outstanding matters in relation to the Stage 1 report but do please let me know if you have any queries or require anything further.

Thanks

Graham

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**From:** Martin Jones [<mailto:Martin.Jones@london.gov.uk>]  
**Sent:** 21 August 2013 14:56  
**To:** Timms, Graham @ London HH; 'Steven.Roberts@rbkc.gov.uk' ([Steven.Roberts@rbkc.gov.uk](mailto:Steven.Roberts@rbkc.gov.uk))  
**Subject:** 3188 Draycott Avenue post stage 1 energy comments

Graham, Steve

Please find below comments on the post stage 1 response for energy – I'll respond separately to the other points in Graham's letter of 6 August. Queries from the stage 1 report are in italics and commentary on the applicant's response is given below each point.

**Energy strategy – New Marlborough School and commercial building**

*1. The strategy identified a 2% reduction against Part L 2010 and was requested to consider, where practical, the scope for additional measures aimed at achieving further reductions.*

The applicant responded that the form of the school and the office have been designed to minimise energy consumption and that therefore the baseline carbon emissions are already significantly lower than current standard practice. The applicant states that this limits opportunities for further carbon reductions as the baseline is already highly efficient. The applicant also states that all roof areas have been optimised for outside play and that the area available for photovoltaics is constrained but what is available has been used.

It is accepted that the baseline emissions for the buildings already reflect best practice in efficient design. The applicant should however provide further plans/elevations/3D sketches demonstrating that no further roof areas are suitable for PV installation as Figure 4 in the energy statement isn't sufficiently illustrative to understand the constraints. The applicant should liaise with the borough to ensure the short fall in CO2 reductions is met off-site.

*2. The applicant should confirm that a site heat network will be installed. The applicant should confirm that all building uses will be connected to the site heat network. A drawing showing the route of the heat network linking all buildings on the site should be provided. The site heat network will be supplied from a single energy centre. Further information on the floor area and location of the energy centre should be provided.*

The applicant responded that a heat network is not proposed because the proposal is to serve the office building with

ASHPs and the school building with gas boilers as this is the most carbon efficient approach and that therefore having a single energy centre would result in an increase in carbon emissions by changing the strategy of one of the two buildings to be consistent with the other (i.e. office also served by boilers or school also served by ASHPs). The applicant should provide revised calculations for the office using gas boilers as the base case and identifying carbon savings associated with ASHP within the "be green" tier of the energy hierarchy, as they are classified as a renewable energy technology for the purposes of compliance with the energy hierarchy. In this instance it is accepted for the office and the school to have separate plant rooms as it is expected that a future district heating network would run along Draycott Avenue or Sloane Avenue meaning that future connection would not be significantly facilitated by the provision of a single plant room.

Energy strategy – Residential development and street cleansing facility

*3. The applicant should consider the scope for additional measures aimed at achieving further reductions.*

The applicant has stated that the residential element of the development (i.e. excluding the street cleaning facility) achieves the 25% carbon reduction and that no further reductions can be achieved on site. The developer should ensure the short fall in CO2 reductions, equivalent to 7 tonnes of CO2 per annum, is met off-site.

*4. The applicant should confirm that all apartments will be connected to the site heat network. The site heat network will be supplied from a single energy centre. Confirmation of the floor area and location of the energy centre should be provided.*

The applicant has confirmed that a single energy centre will be provided in the basement of the building to serve all apartments. Drawing PA\_080 confirms plant room location on basement 2 and floor area of LTHW boiler room of approximately 95m<sup>2</sup>. No further information required on this issue.

Let me know if you have any queries.

Thanks

Martin

Martin Jones, Strategic Planner

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