

Alex Spooner
Hollybrook Homes Ltd
19 Queen Elizabeth Street
London
SE1 2LP

21st August 2019

Dear Alex,

RE: Osiers Road Commercial Units BREEAM (Shell Only)

With reference to the requirement for the BREEAM assessed areas of the Osiers Road development to meet BREEAM 'Excellent' for the BREEAM 2019 scheme, I am writing as a BREEAM assessor to state that in my opinion, the requirement of BREEAM 'Excellent' will be extremely difficult to reach, and perhaps is an unrealistic aim for this development. Following a meeting with the Hollybrook design team for this project, it was concluded that the commercial aspects for the scheme are actually being built to a 'shell only' standard. Therefore, the BREEAM assessment will need to follow a 'shell only' approach, rather than 'shell & core'. This is because the developer cannot be expected to provide evidence that relates to the fit out of these units when this will be down to individual tenants, who are currently not known.

It is worth making reference to the below extract from the BREEAM 2018 New Construction manual:

<p>In this respect each BREEAM rating broadly represents performance equivalent to:</p> <ol style="list-style-type: none">1. Outstanding: Less than the top 1% of UK new non-domestic buildings (innovator)2. Excellent: Top 10% of UK new non-domestic buildings (best practice)3. Very Good: Top 25% of UK new non-domestic buildings (advanced good practice)4. Good: Top 50% of UK new non-domestic buildings (intermediate good practice)5. Pass: Top 75% of UK new non-domestic buildings (standard good practice)
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Based on the above, it can be seen that BREEAM 'Excellent', as defined by BREEAM (the BRE), is deemed to be for less than 10% of UK new non-domestic buildings, i.e. buildings that are achieving best practice in all areas. The local authority requirement at the time for all developments to reach BREEAM 'Excellent' in my opinion appears to therefore misunderstand the BREEAM process - it is worth noting that with each update to the BREEAM manual, the BRE are continually updating credit sections, as well as making the criteria harder to achieve in order to facilitate an improvement in overall standards for the industry. For example, a BREEAM 2018 'Very Good' certified building has met a more stringent set of criteria than a BREEAM 2014 or BREEAM 2011 'Very Good' certified building.

As noted above, the commercial elements of this development are now to be assessed to a 'shell only' standard, as it is anticipated that tenants will complete the fit-out of each. Assessing to a 'shell only' standard allows all evidence to come from the developer and design team, and to not be penalised for not being able to achieve credits which would require tenant information, which understandably would not be available. However, by assessing to a 'shell only' standard, which has a reduced number

of credits available (based on the reasoning just mentioned), means that each credit is worth a higher percentage (has a higher weighting) of the overall score. This subsequently means that credits that are unachievable or not targeted due to various reasons, for a project, have an increased detrimental effect on the overall score, i.e. a higher percentage is unachievable for each credit.

Following a thorough review of the project to enable the pre-assessment to be produced and updated for the commercial spaces (to a 'shell only' standard), it was determined that the likely realistic and feasible maximum rating for this assessment would be BREEAM 'Very Good'. A building certified to BREEAM 2018 'Very Good' is still within the top 25% of all UK new non-domestic buildings, meeting 'advanced good practice' as noted above by the BRE. The current pre-assessment (to a 'shell only' standard) shows a score that translates to a BREEAM 'Excellent' rating, however, in reality and as the design of a project progresses, some credits inevitably become unachievable, and some credit sections also contain an element of risk, i.e. you won't know how many credits will be able to be awarded until much further into the construction process, or in some cases, until the end of the project. Based on this, and as noted above, the most likely realistic and achievable rating for this assessment would be BREEAM 'Very Good'. It is worth noting that for a 'shell only' assessment, the current assessment would be meeting all the required minimum standards for BREEAM 'Excellent' as defined in the BREEAM manual.

Credit Review:

- Man 03 Environmental Management: This credit is not possible as the main contractor does not have a valid EMS certificate such as ISO 14001.
- Hea 01 Visual Comfort – Daylighting and View Out: Due to the commercial elements being shell only, there are no internal layouts available for these credits. It may therefore not be possible to meet the requirements for these credits.
- Hea 07 Safe and Healthy Surroundings – Safe Access: Due to the layout of the development, this credit is not anticipated to be able to be achieved.
- Ene 01 Reduction of Energy Use and Carbon Emissions: High numbers of credits are extremely difficult to achieve for 'shell only' projects. The BRUKL documents for 'shell only' only focus on the building's heating and cooling energy demand (as required by BREEAM) which relates to the building's fabric efficiency - other elements that relate to the primary energy demand of the building can therefore not be included within the calculation to help improve the score. It is therefore not possible to get a high number of credits for this section unless you can design the building and the services holistically, which in the case of this development is not possible, hence the 'shell only' approach. Based on this reasoning, it is therefore extremely difficult to get a high number of credits for 'shell only' projects under the Ene 01 category. Four credits are currently targeted (minimum standard for BREEAM 'Excellent'), however this will be confirmed once the design stage BRUKL(s) are available.
- Ene 04 Low Carbon Design – Passive Design and Free Cooling: Not anticipated for the assessment as extremely difficult to achieve for a 'shell only' project as information would be required based on the fit-out of the unit, which in this case, will not be available.
- Tra 02 Sustainable Transport Measures: Maximum number of feasible credits have been targeted – the remaining credits are not able to be achieved by this development. For example, setting up a car share club and providing dedicated car parking spaces, and also providing a certain percentage of electric charging points are not achievable – only disabled parking bays are included for the project, the project is car free.

- Mat 02 Environmental Impacts from Construction Products (Environmental Product Declarations (EPDs)): Credit currently included for the assessment, however, this is a difficult and risky credit to rely on. It may also not be a feasible credit to target as it limits the selection of materials for the project – the majority of materials on the market do not have EPDs.
- Mat 03 Responsible Sourcing of Materials: This is a risk credit section as the number of achievable credits will not be known until further on into the construction of the project, as details of all materials (i.e. manufacturer and product name) are required. It is therefore not advisable to target the maximum number of credits.
- Mat 06 Material Efficiency: Credit considered not achievable due to requirement of input from RIBA 1 which does not appear to have taken place.
- Wst 01 Construction Site Waste Management: Two out of three credits currently targeted for waste production. However, this is a risk credit section as the number of achievable credits will not be known until the end of the project once all of the waste data has been finalised and collated. It is therefore not advisable to target the maximum number of credits.
- Wst 02 Use of Recycled and Sustainably Sourced Aggregates: Credit not currently targeted due to very specific requirements for this section. Once further information is available there may be a potential to pick up this credit, however, it is not advisable to include this credit at the current stage.
- Land Use and Ecology Credit Section: Number of credits currently assumed at this stage therefore this is a risk section –further input from ecologist required to determine actual number of credits that can be targeted for the site.
- Pol 03 – Flood Resilience: The flood risk assessment notes that site lies on Flood Zone 2 and Flood Zone 3a. Credits for this section may therefore not be achievable.
- Pol 03 – Minimising Watercourse Pollution: Credit not currently anticipated, as information required from drainage consultant at a later date. It is therefore not advisable to target this credit at this stage.

As has been noted above, and based on a thorough review of the available credits for the project, the most likely realistic and achievable rating for this assessment would be BREEAM 'Very Good', which as defined by the BRE, would still place the commercial elements of the development in the top 25% of all UK new non-domestic buildings, meeting 'advanced good practice'.

Please let me know if you have any questions on the above or would like to discuss.

Yours sincerely,



Tom Lowther
Senior Environmental Consultant & BREEAM Assessor