

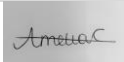
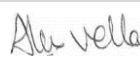
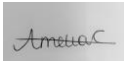

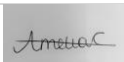
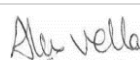


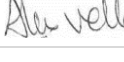
Highgate Studios

Sustainability Statement

Client Kentish Town UK Office Propco Limited

Date 25th April 2023
File Ref P.019009 Sustainability Statement
Revision R005
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Revision

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Executive Summary

As part of the planning submission process for Highgate Studios development RED Engineering Design has been engaged to provide a sustainability strategy report.

Having reviewed the scheme documents and in conjunction with current, local and national policy frameworks; The National Policy Framework 2021¹, The London Plan 2021², The Camden Local plan 2017³, The Kentish Town Neighbourhood Plan 2016⁴ and The Dartmouth Park Neighbourhood Plan 2020⁵, this report demonstrates the applicant is committed to ensuring the scheme delivers a building that minimises its environmental impact.

The key features of the proposed Development with regard to sustainability are contained within the body of this report as follows;

- Refurbishment of existing commercial space instead of new buildings where feasible.
- Installation of blue roof areas, providing source control and limit discharge rates from the Site.
- Inclusion of urban greening, to provide enhanced biodiversity;
- Minimisation of operational energy consumption through building fabric and building services efficiency measures;
- Inclusion of Low / Zero Carbon (LZC) technologies resulting in an overall reduction in CO² emissions of 38%
- Provision of water efficient/low flow sanitaryware fittings and fixtures to reduce potable water consumption and foul water discharge;
- Prolonging the use of a building, significantly reducing the annualised carbon emission of the development;
- Well located and accessible Development, incorporating cycle parking spaces to encourage sustainable and active transport choices; and
- Car-free scheme, thus lowering transport emissions.

Due to the nature and location of the site in the city centre, the scope for sustainable design features is constrained in some aspects. The proposed Development will therefore deliver sustainability improvements on site to meet the requirements of local and national policies.

¹ National Planning Policy Framework ([publishing.service.gov.uk](https://www.gov.uk/policy-framework))

² https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf

³ Camden Local Plan 2017

⁴ KTNF Plan for SEA screening ([camden.gov.uk](https://www.camden.gov.uk))

⁵ [fd68e797-00b9-a199-6d10-8750188b67f9 \(camden.gov.uk\)](https://www.camden.gov.uk)

Contents

1.0	INTRODUCTION	1
2.0	SITE LOCATION AND DESCRIPTION	2
2.1	Existing Site Context.....	2
2.2	Proposed Development / Scope of works	2
3.0	POLICY REVIEW.....	3
3.1	National Planning Policy Framework (NPPF)	3
3.2	The London Plan (2021)	3
3.3	Camden Local Plan (2017).....	3
3.4	Neighbourhood plans.....	6
3.5	Kentish Town Neighbourhood Plan	6
3.6	Dartmouth Park Neighbourhood Plan	7
4.0	SUSTAINABILITY REVIEW OF THE DEVELOPMENT	8
4.1	Design and amenity.....	8
4.2	Use of Natural Resources and Minimizing Waste.....	8
4.3	Sustainable Transport	9
4.4	Energy	10
4.5	Water	12
4.6	Sustainable drainage and flood risk.....	12
4.7	Nature conservation and biodiversity.....	13
4.8	Environmental Certification	13
4.9	Pollution	14
5.0	CONCLUSION	15

1.0 Introduction

RED Engineering Design has been instructed on behalf of Kentish Town UK Office Propco Limited (the Applicant) in support of planning for Highgate Studios site, located in the borough of Camden (hereafter referred to as 'the Site').

This Sustainability Statement describes the approach that the design team has taken to integrate and consider sustainability during the design process. The purpose of this report is to assess the extent that the Site accords with the principles of sustainable development and the relevant planning policy requirements. The development of the sustainability strategy is based on the following principles:

- Set categorical objectives and constraints to cover all sustainability aspects
- Reduce upfront and operational Carbon emissions.
- Align to the transition to net-zero emissions future.
- Promote sustainable practices by design choices.

The project team for the Development is comprised of the following parties.

PROJECT TEAM	REPRESENTATIVE
Applicant	Kentish Town UK Office Propco Limited
Project Manager	Optimo Construction Consulting Limited
Planning Consultant	dp9
Architect	Piercy & Company
Cost Consultant	Gardiner & Theobald LLP
M&E Consultant	RED Engineering Design
Civil and Structural Consultant	Heyne Tillett Steel
Sustainability Consultant	RED Engineering Design
Sustainability Strategy	Savills Earth
BREEAM Consultant	RED Engineering Design
Acoustician	Sandy Brown
Landscape Architect	CLB Studio Limited
Ecologist	Schofield Lothian
Highways & Transport Consultant	RGP
Air Quality Consultant	Trium Environmental Consulting LLP
Daylight, sunlight & rights to light consultant	GIA
Principal Designer	Orsa Projects Limited
Townscape & Heritage Consultant	The Townscape Consultancy
Environmental Impact Assessor	Trium Environmental Consulting LLP

2.0 Site location and description

2.1 Existing Site Context

The site address is 53-79 Highgate Road, London, NW5 1TL and the location in relation to its surroundings is shown in Figure 1. This site consists of a number of existing buildings with Highgate Road to the east, Sanderson Close to the north and Carkers Lane to the south, running partially through the site. The position of the site is outlined in red.

2.2 Proposed Development / Scope of works

The proposed scheme is to provide two new buildings, Plots A and F, extensions on three existing buildings, Plots B, E, & J, a roof extension on Plot I and the erection of a new entrance pavilion with cycle parking, hard and soft landscaping and associated works and plant to provide class E(g) use plus a range of other supporting and ancillary uses.



Figure 1. Site location

3.0 Policy Review

In order to ensure the delivery of sustainable development, it is important to identify any current and emerging policy requirements that are relevant to the Site and development proposals. A desk-based review of relevant national, regional and local planning policy has therefore been undertaken.

3.1 National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF), last revised in July 2021, plays a key role in delivering the Government's objectives on sustainable development. The NPPF has three overarching objectives, to promote effective environmental protection, foster well-designed, healthy communities and support economic growth and productivity. In this way, the guidance seeks to prioritise long term interests over short term success and encourages ownership at the local level. Camden Council has sought to incorporate core NPPF strategies into their Local Plan based on the principle of the presumption in favour of sustainable development. Key sustainability objectives within the NPPF are set out below:

- Reduce the need for car dependency and provide easy access to public transport;
- Build prosperous communities with opportunities for employment and economic growth across all areas of society;
- Ensure that all new development contribute the government's targets of carbon emission reductions;
- Maintain, enhance or restore biodiversity and geological interests; and
- Protect the condition of land, its use, and its development from potential hazards.

3.2 The London Plan (2021)

The London Plan, revised in March 2021, sets out the overall strategic plan for London and requires that growth and change in the city will be managed to realise the mayor's vision for London's sustainable development over the next 20-25 years.

In particular, development should respond to the energy and sustainability policies of the London Plan, including, but not limited to;

- Policy SI 1: Improving air quality ;
- Policy SI 2: Minimizing greenhouse gas emissions;
- Policy SI 3: Energy infrastructure;
- Policy SI 4: Managing heat risk;
- Policy SI 5: Water infrastructure;
- Policy SI 7: Reducing waste and supporting the circular economy;
- Policy SI 12: Flood risk management;
- Policy SI 13: Sustainable drainage;
- Policy T1: Strategic approach to transport;
- Policy T3: Transport capacity, connectivity and safeguarding;
- Policy T5: Cycling;
- Policy T6: Car parking; and
- The new Energy Hierarchy; Be Lean, Be Clean, Be Green

3.3 Camden Local Plan (2017)

The Camden Council (hereafter referred to as 'the council') Local Plan 2017 sets out the vision, strategic objectives and policies for development in Camden for the period 2016 to 2031. It forms the statutory

development plan for the borough, along with the London Plan. The key policies that are most relevant to the project are discussed below.

3.3.1 Policy A3: Biodiversity

This policy is designed to support the London biodiversity strategy and Camden Biodiversity Action Plan (BAP) and aims to maximise opportunities for biodiversity in and around developments in order to deliver a net gain in biodiversity and a range of wider environmental benefits.

As such developments will be assessed against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.

The demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species.

3.3.2 Policy A4: Noise and vibration

The policy seeks to ensure that noise and vibration is controlled and managed. As such, developments should have regard to Camden's Noise and Vibration Thresholds. Planning permission will not be granted for;

- Development likely to generate unacceptable noise and vibration impacts; or
- Development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

The impact on local amenity from deliveries and from the demolition and construction phases of development should be minimised.

3.3.3 Policy CC1: Climate Change Mitigation

The council's 'green action for change' sustainability plan committed to a 40% CO₂ reduction by 2020. This policy seeks to:

- Promote zero carbon development
- Requires all major developments to meet London Plan CO₂ targets
- Minimise car travel
- Support decentralised energy networks
- Demolish only where proven to be impossible to retain buildings
- Optimise resource efficiency
- Assess the feasibility of connecting to a decentralised energy network

3.3.4 Policy CC2: Adapting to climate change

This policy requires any development involving 5 or more residential units or 500 sqm or more of additional floorspace to demonstrate the following in a Sustainability Statement;

- The protection of existing green spaces and promote new appropriate green infrastructure;
- Not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems;
- Incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and
- Measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

The council additionally expects non-domestic developments of 500 sqm of floorspace or more to achieve a rating of “Excellent” in BREEAM assessments and is encouraging a move towards zero carbon in new developments from 2019.

3.3.5 Policy CC3: Water and flooding

This policy seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible and requires developments to;

- Incorporate water efficiency measures;
- Avoid harm to the water environment and improve water quality;
- Consider the impact of development in areas at risk of flooding (including drainage);
- Incorporate flood resilient measures in areas prone to flooding;
- Utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
- Not locate vulnerable development in flood-prone areas. Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.

3.3.6 Policy CC4: Air quality

This policy requires the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken of the actions identified in the Council’s Air Quality Action Plan.

Air Quality Assessments (AQAs) are required where a development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact.

3.3.7 Policy CC5: Waste

This policy seeks to make Camden a low waste borough. As such, developments are required to include facilities for the storage and collection of waste and recycling.

3.3.8 Policy C6: Access for all

This policy seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. As such, all buildings are expected to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all. A proactive approach to improving accessibility within the built environment is essential to increase the longevity to Developments

3.3.9 Policy E1: Economic development

This policy seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. As such, the Council supports direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031.

Existing employment sites and premises in the borough that meet the needs of industry and other employers will be safeguarded

3.3.10 Policy T1: Prioritising walking, cycling and public transport

This policy requires developments to promote sustainable transport by prioritising walking, cycling and public transport in the borough. Specifically, developments should;

- Improve the pedestrian environment by supporting high quality public realm improvement works;

- Make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;
- Be easy and safe to walk through ('permeable');
- Be adequately lit;
- Provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate;
- Provide for and make contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietway's Network, Cycle Super Highways;
- Provide for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan; and
- Make provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.

3.3.11 Policy T2: Parking and car-free environment

This policy limits the availability of parking and requires all new developments in the borough to be car-free. Onsite parking will be limited to spaces designated for disabled people where necessary, and/or essential operational or servicing needs.

On-street or on-site parking permits in connection with new developments will not be issued and legal agreements will be used to ensure that future occupants are aware that they are not entitled to on-street parking permits.

3.3.12 Policy T3: Transport infrastructure

The policy seeks improvement to transport infrastructure in the borough. As such, planning permission will not be granted for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects.

Existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport will be protected from removal or severance.

3.3.13 Policy T4: Sustainable movement of goods and materials

This policy promotes the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road. As such the following will be encouraged;

- The movement of goods and materials by canal, rail and bicycle where possible;
- Protection of existing facilities for waterborne and rail freight traffic; and
- Promotion of the provision and use of freight consolidation facilities.

3.4 Neighbourhood plans

The site is within the demise of both Kentish Town and Dartmouth Park neighbourhoods. Both areas have local Neighbourhood Plans, Kentish Town June 2016, and the Dartmouth Park March 2020. These contains various policies and those which relate to sustainability are noted below.

3.5 Kentish Town Neighbourhood Plan

3.5.1 Green and open spaces – policies GO1, GO2 and GO3

These policies ensure developments will enhance the environmental sustainability of the area through improving and greening the local street environment and promoting biodiversity.

3.6 Dartmouth Park Neighbourhood Plan

3.6.1 Policy DC1: Enhancing the sense of place

This policy ensures that developments contribute to the sense of place and character of the well-developed suburban area by;

- Maintaining existing green and other open spaces, and
- Creating additional green or open spaces in accordance with Camden's policies; and

3.6.2 Policy DC3: Requirement for good design

This policy requires all developments demonstrate good quality design, responding to and integrating with local surroundings and landscape context. As such developments should ensure;

- That any extensions or modifications to existing buildings are subordinate to the existing development and in keeping with its setting, including the relationship to any adjoining properties;
- Good quality materials that complement the existing palette of materials used within the immediate area are utilised; and
- Sufficient appropriately sited and well-integrated amenity space, refuse and recycling storage, bicycle and mobility vehicle parking and storage, and delivery space (as appropriate to the size and type of development) are provided to ensure a high quality and well managed streetscape.

3.6.3 Policy ES4: Energy Efficiency

This policy supports measures which increase energy efficiency and which reduce energy and resource loss, by;

- Allowing for the installation of solar panels that are sensitively incorporated and (where the development is located within the Conservation Area and does not constitute permitted development) either are not visible from the street or are physically and visually integrated into the roof and do not project above the plane of the roof (see examples below); and
- Ensuring that all proposals involving substantial demolition demonstrate that rebuilding will deliver greater carbon savings than refurbishment, taking into account the embodied-carbon and whole-life effects of the proposed development.

4.0 Sustainability review of the Development

4.1 Design and amenity

Developments must respect the existing context, character, and appearance of the area, including improvements to the streetscape in order to positively contribute to the local area.

RELEVANT APPLICABLE POLICIES	
Camden Local Plan (2021)	Policy C6: Access for all Policy E1: Economic Development
Dartmouth Park Neighbourhood Plan	Policy DC3: Requirement for good design

The Sustainability Vision prepared by Savills Earth in support of planning demonstrates how the proposed use of the site represents a significant opportunity to improve the streetscape of the area. Proposed external works have been designed to increase places to gather, meet and socialise to accommodate successful, long-term commercial uses of the buildings. The provision of affordable and multifunctional work and business-space will optimise economic viability and usage from the surrounding areas.

Proposed internal works will promote easy access and movement through the spaces and provision for multi-sensory visually perceptible information to accommodate for the different needs of people.

4.2 Use of Natural Resources and Minimizing Waste

A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. The adoption of circular principles throughout the design and construction process will aim to reduce waste and move towards achieving net zero-waste.

RELEVANT APPLICABLE POLICIES	
Camden Local Plan (2021)	Policy CC5: Waste
Dartmouth Park Neighbourhood Plan	Policy DC3: Requirement for good design
The London Plan (2021)	Policy SI 7: Reducing waste and supporting the circular economy Policy SI 8: Waste capacity and net waste self-sufficiency

The project should consider circular economy principles at all stages of the project to reduce embodied carbon and operate within a circular economy in line with those described in figure 2. The prevention of waste creation is given the top priority and can be supported during the design stages of the project. The use of offsite pre-fabrication incentives and sourcing products with minimised transport packaging aid in the reduction of potential waste material arriving at site.

Proposals seek to retain buildings that are of high architectural merit, equating to 86% of the existing floor area. Heyne Tillett Steel confirm the potential reuse of steel, in the form of beams or columns from deconstructed buildings before they are demolished, reducing the upfront embodied carbon by a factor of eight, accounting for the extra energy from demolition and transportation.

During the construction phase of the development low levels of waste production will be targeted. This will be achieved through the development and implementation of a Site Waste Management Plan (SWMP) or equivalent for the site. The SWMP will detail how methods / practices on site will be in accordance with the waste hierarchy Targets for the diversion of waste from landfill.

Waste materials will be sorted into separate key waste groups either onsite or offsite through a licensed contractor recovery. In addition, consideration has been given to the operational waste of the site, hence waste facilities will be provided, in line with Local Authority's requirements. The site will be designed to provide appropriate waste / recycling segregation storage facilities.

Figure 2. Waste Hierarchy



4.3 Sustainable Transport

Appropriate transport links are a key element of sustainable development, so that low carbon transport choices can be made. Camden Council promotes sustainable transport choices in order to mitigate the impact of developments on the environment, improve air quality, promote healthier lifestyles and respond to congestion affecting roads and transport.

RELEVANT APPLICABLE POLICIES	
Camden Local Plan (2021)	Policy T1: Prioritising walking, cycling and public transport Policy T2: Parking and car-free environment Policy T3: Transport infrastructure Policy T4: Sustainable movement of goods and materials
The London Plan (2021)	Policy T1: Strategic approach to transport Policy T3: Transport capacity, connectivity and Safeguarding Policy T4: Cycle

	Policy T5: Car parking
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The Site is situated within a highly accessible town centre location and Development proposals are for a car free development. Kentish Town Underground and National Rail Stations lie approximately 500m north-west the Site and provide direct links to London. As a result, the site achieves a PTAL Rating of 6a (Appendix A). Proposals have been designed to be a car-free development on this basis, with the exception of disabled parking pays to incorporate electric vehicle charge points.

Car-free developments significantly reduce the reliance on private vehicles and are in line with the national, regional, and local planning policies. The area has high levels of footfall and good pedestrian facilities, including signalised controlled crossing facilities, dropped kerbs and tactile paving.

A Transport Statement prepared by RGP in support of planning outlines the availability of active transport in the surrounding area. This includes TFL Cycleway route C6 to the north-west, short stay cycle parking stands bus routes 88 and 214 located on Highgate Road. It is intended for 234 new long-stay cycle parking spaces and 13 new short-stay parking spaces increasing the number of short stay spaces to 66, an overall total of 300 cycle parking spaces, to be provided for the proposed works in accordance with standards outlined in the London Plan.

The transport statement concludes that safe and convenient access can be provided to the development site and that the development represents an insignificant impact on public transport facilities.

4.4

Energy

In order to contribute towards The London Plan target of a 60% reduction of carbon emissions by 2050, Camden Council recognises the importance of incorporating sustainable aspects into building design to reduce carbon emissions.

RELEVANT APPLICABLE POLICIES	
Camden Local Plan (2021)	Policy CC2: Adapting to climate change
Dartmouth Park Neighbourhood Plan	Policy ES4: Energy Efficiency
The London Plan (2021)	Policy SI 2: Minimising greenhouse gas emissions Policy SI 3: Energy infrastructure Policy SI 4: Managing heat risk The Energy Hierarchy

The Energy Statement undertaken by RED Engineering Design in support of planning, identifies how the Proposed Development will deliver the maximum possible sustainability improvements to the site in line with the 'Energy Hierarchy' identified in The London Plan, figure 3.

Be Lean – Use Less Energy

- New building fabric with very high levels of insulation
- High levels of air tightness
- Optimised glazed areas
- External shading
- Solar control glazing to minimise cooling loads
- Air Source heat Pump (ASHP) for space heating with no gas on site

- Mechanical ventilation with heat recovery
- High Efficacy LED Luminaires
- Lighting control including presence detection and daylight linked dimming
- 100% electric DHW

The adoption of energy efficiency measures, under a 'Lean' case building, results in a 25% reduction in CO² emissions.

Be Clean – Supply Energy Efficiently

The next step in the energy hierarchy is the 'be clean' strategy of supplying the required energy. Two options for decentralised energy are evaluated within the Energy Statement; district heating and combined heat and power (CHP). At the time of writing, no existing or proposed district heat networks are identified within close proximity to the proposed development. Furthermore, creating a new heat network would not be feasible within the constraints of the site.

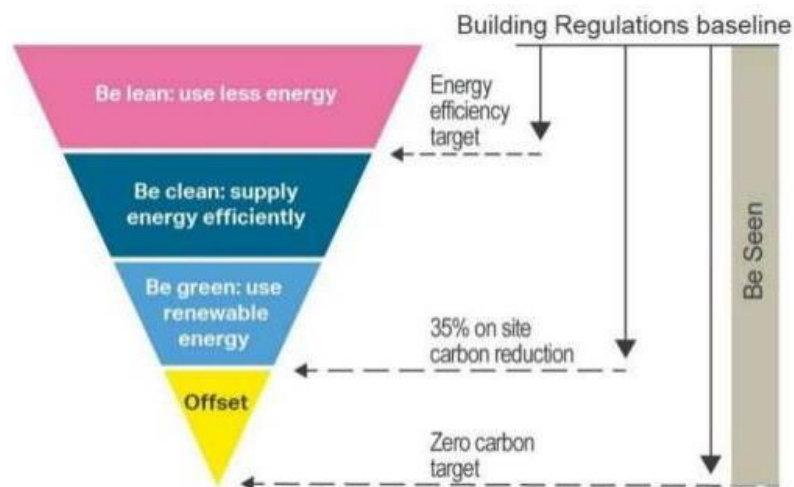
Combined Heat and Power is unfeasible for the proposed development, given that the recent decarbonisation of the UK national grid has led to a reduction in carbon emissions from grid electricity, resulting in CHP no longer offering the required carbon savings. Furthermore, burning fossil fuels on site would have a detrimental impact on local air quality in an area already identified as an Air Quality Management Area (AQMA).

Be Green – Use Renewable Energy

The feasibility of Low / Zero Carbon technologies such as biomass, wind turbines, solar domestic hot water, ground source heat pumps, photovoltaics (PV) and Air Source Heat Pumps have been reviewed as part of the Energy Statement. The most practical systems to meet the required energy and CO² emissions reductions are considered to be Air Source Heat Pumps and Solar Photovoltaic Panels (PV). These provide a combined CO² emissions reduction of 38%, exceeding the 35% minimum threshold targeted required by planning. This comprises a total PV coverage of 250m² across plots B, E and J.

In order to achieve the 100% target reduction in CO₂ emissions a cash-in-lieu contribution of £80,382 will be payable.

Figure 3. Energy Hierarchy



4.5 Water

Current climate projections forecast significant reductions in UK rainfall, with rainfall in the South of England projected to be halved during summer months by 2080. The incorporation of water efficiency measures into buildings will, therefore, be critical in limiting future deficits in water availability as well as reducing associated carbon emissions. Camden Council recognises the need for the implementation of water saving measures within building design.

RELEVANT APPLICABLE POLICIES	
Camden Local Plan (2021)	Policy CC2: Adapting to climate change Policy CC3: Water and flooding
The London Plan (2021)	Policy SI 5: Water infrastructure

4.5.1 Water efficiency

The Development will incorporate several measures to reduce water demand and usage. An assessment of the efficiency of the Developments domestic scale water consuming components will be undertaken for the purpose of BREEAM. The proposed Development will be assessed against a notional baseline from the BRE in order to provide an accurate industry benchmark to assess against, and it is the design team's aspiration to achieve the equivalent of a 40% improvement over baseline performance - the equivalent of 3 credits under the BREEAM Wat 01 issue. This will be achieved through the incorporation of efficient sanitaryware - a combination of low flow taps, showers and low-flush toilets.

A water meter will be installed on the mains water supply to the building to enable the monitoring of water consumption in line with BREEAM requirements and reduce water wastage. Areas consuming 10% or more of the buildings total water demand, will be either fitted with individual sub meters or have water monitoring equipment integral to the plant or area.

4.6 Sustainable drainage and flood risk

The Council recognises the potential for increases in frequency and intensity of localised storms over the Borough as a result of climate change. Such rainfall patterns will exacerbate localised drainage problems, which may be increased by the use of non-porous materials in construction. Developments are, therefore, required to adopt the principles of Sustainable Urban Drainage Systems (SuDS) to ensure that surface water is managed sustainably and effectively.

RELEVANT APPLICABLE POLICIES	
Camden Local Plan (2021)	Policy CC2: Adapting to climate change Policy CC3: Water and flooding
The London Plan (2021)	Policy SI 12: Flood risk management Policy SI 13: Sustainable drainage

4.6.1 Surface water run-off rate

In order to achieve optimal discharge rates, surface water will be discharged to a blue roof provided. The blue roof is designed explicitly to provide initial temporary water storage and then gradual release of stored water, typically rainfall.

4.7 Nature conservation and biodiversity

The protection and enhancement of biodiversity in the Borough is crucial, particularly in the context of biodiversity losses due to development pressure, climate change and deficiencies in access to nature.

RELEVANT APPLICABLE POLICIES	
Camden Local Plan (2021)	Policy A3: Biodiversity
Kentish Town Policies	Policy: GO1, GO2 and GO3: Green and open spaces
Dartmouth Park Neighbourhood Plan	Policy DC1: Enhancing the sense of place
The London Plan (2021)	Policy G1: Green infrastructure Policy G5: Urban greening Policy G6: Biodiversity and access to nature

A Preliminary Ecology Appraisal has been undertaken by Assystem in support of planning. It is understood that the Site does not support any rare habitats nor do proposals involve the removal of any notable or rare habitats. As such, due to the type of works proposed and lack of habitat connectivity it is anticipated that impacts on habitats will be negligible.

The Site offers limited opportunities to support roosting bats as a result of the lack of vegetation. However, in order to provide the potential for biodiversity net gain, bird and bat boxes should be installed on the refurbished buildings. To enhance the effectiveness of this measure, the boxes will be installed on the building's southeast to north aspect to avoid direct sunlight and the heaviest rain. The provision of additional ecological enhancement measures in the form of new ground floor soft landscaping, wildlife friendly planting and native tree planting would represent a valuable contribution to urban greening.

4.8 Environmental Certification

All developments must achieve the highest feasible level of the relevant sustainable design standards in order to contribute to Camden Council's overarching sustainability objectives. The use of the Building Research Establishment Environmental Assessment Methodology (BREEAM) certification scheme will help to mitigate the life cycle impacts of new, or major works on existing buildings, on the environment.

RELEVANT APPLICABLE POLICIES	
Camden Local Plan (2021)	Policy CC2: Adapting to climate change

As part of the development of the Site's sustainability strategy, it is proposed that building elements are assessed against the BREEAM New Construction 2018 methodology and achieve an "Excellent" rating in line with the council's policy.

A BREEAM pre-assessment has been prepared for the proposed Development to provide an initial strategy based on the production of compliant evidence which must be provided by the design team during the subsequent Design Stage and Post Construction Stage.

The pre-assessment provides an indicative pathway to achieving credits but the assessments themselves are dynamic and as such the final constructed Site may not be a complete reflection of the credits initially targeted as part of the BREEAM pre-assessment undertaken at the pre-planning stage.

4.9 Pollution

All developments must be designed, constructed and operated to limit contribution to poor air quality and excessive noise as far as possible.

RELEVANT APPLICABLE POLICIES	
Camden Local Plan (2021)	Policy CC4: Air quality
The London Plan (2021)	Policy SI 1: Improving air quality. Policy SI 2: Minimising greenhouse gas emissions

As part of the BREEAM certification, the Applicant is committed to ensuring the principal contractor signs up to the Considerate Constructors Scheme (CCS) and Code of Construction Practice as encouraged by Sustainable Design and Construction SPD. This will require the contractor to go beyond best practice measures to help protect the environment, including minimising the potential impact from all on-site sources of pollution. Potential sources of pollution have been discussed in detail below.

4.9.1 Air Quality

Proposals seek to improve building layout with consideration to air quality, such as the placement of air outlets away from pollution sources (e.g., high traffic roads). Ventilation systems will be specified with high quality levels of filtration in proportion to local air pollution levels and IAQ sensors will allow for continuous monitoring of pollutants.

An Air Quality Assessment has been prepared by Air Pollution Services in support of planning. This confirms the proposed development to be located within an Air Quality Management Area (AQMA). Overall, the local air quality impacts from the proposed development are considered to be 'not significant' and comply with local, regional and national policies. The proposed development is compliant with the requirements of the AQN guidance and is therefore considered to be air quality neutral assessment.

4.9.2 Noise

A Environmental Noise Survey Report has been prepared by Sandy Brown Consultants in support of planning. The noise assessment indicates that the proposed development is unlikely to conflict with national, regional and local planning policy or guidance.

All building services plant will be designed to achieve set noise limits. The assessment concludes that predicted noise rating levels at the all of the closest residential noise sensitive receptors will be limited to 10 dB below the background sound level, in line with noise thresholds outlined in Appendix 3 of The Camden Local Plan.

5.0 Conclusion

This report demonstrates how the proposed Development accords with the sustainability requirements of the NPPF, Camden Local Plan and relevant Neighbourhood Plans. The applicant is committed to ensuring the scheme delivers a building that is high quality and minimises its environmental impact.

The Key features of the proposed Development with regard to sustainability are as follows;

- Refurbishment of existing commercial space;
- Well located and accessible Development, incorporating cycle parking spaces to encourage sustainable and active transport choices;
- Car-free scheme, thus minimising transport emissions;
- Minimisation of operational energy consumption through building fabric and building services efficiency measures;
- Inclusion of Low / Zero Carbon (LZC) technologies resulting in an overall reduction in CO² emissions of 38%
- Prolonging the use of existing buildings, significantly reducing the annualised carbon emission of the development;
- Provision of water efficient/low flow sanitaryware fittings and fixtures to reduce potable water consumption and foul water discharge;
- Installation of a blue roof, providing source control and limit discharge rates from the Site; and
- Inclusion of urban greening, to provide enhanced biodiversity.