

Sustainability Statement

Prepared by Scotch Partners

Submitted on behalf of Lab Selkirk House Ltd

Selkirk House, 166 High Holborn and 1 Museum Street, 10-12 Museum Street, 35-41
New Oxford Street and 16A-18 West Central Street, London, WC1A 1JR

June 2023



ScotchPartners
Building Services Engineering | Sustainability | Acoustics

**Selkirk House, 166 High Holborn and 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street
and 16A-18 West Central Street, London, WC1A 1JR**

Lab Selkirk House Ltd

Sustainability Statement

R09

26/06/2023

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Contents

1	Executive Summary	4	7	Urban Greening and Biodiversity	25
1.1	Sustainability Objectives and Aspirations	4	7.1	Key Issues.....	25
1.2	Development Description	4	7.2	Application Response.....	25
1.3	Key Sustainability Targets	6	8	Materials and Waste	27
1.4	Summary of Proposed Measures.....	6	8.1	Key Issues.....	27
1.5	Conclusion	7	8.2	Circular Economy	27
2	Introduction.....	8	9	Local Impacts	30
2.1	Development Description	8	9.1	Local Communities.....	30
2.2	Key Policies and Requirements.....	9	9.2	Local Pollution.....	30
2.3	Planning Authority Aspirations	12	9.3	Application Response.....	31
2.4	Project Team Aspirations.....	12	10	Sustainable Travel.....	32
2.5	Key Sustainability Targets	12	10.1	Key Issues.....	32
2.6	Supporting Information	12	10.2	Site Travel Context.....	32
3	BREEAM	13	10.3	Application Response.....	32
4	Health & Wellbeing.....	15			
4.1	Key Issues.....	15			
4.2	Application Response: Site-Level	15			
4.3	Application Response: Building-Level	16			
5	Energy and Carbon	17			
5.1	Key Issues.....	17			
5.2	Net Zero Carbon	17			
5.3	Energy Reduction Measures	17			
5.4	LETI net zero carbon	18			
5.5	Performance against reduction targets	18			
5.6	Carbon offsetting.....	21			
5.7	Whole Life-Cycle carbon emissions	21			
6	Climate Resilience.....	22			
6.1	Key Issues.....	22			
6.2	Climate Change Adaptation Risk Assessment	22			
6.3	External Overheating.....	22			
6.4	Water Supply	23			
6.5	Flood Risk and Drainage	23			
6.6	Resilient Foundations and Structures	24			

1 Executive Summary

1.1 Sustainability Objectives and Aspirations

London Borough of Camden ('the Council') and the Mayor of London have declared a 'Climate Emergency' with the Council's declaration including an 'Ecological Emergency'. Both have an aspiration to achieve a Net Zero Carbon borough and city by 2030, 20 years ahead of the national target. In June 2020, the Council approved a 5-year 'Climate Action Plan' which creates a framework for action across all aspects of the borough with the aim of achieving zero carbon by 2030.

Health and wellness are critical social issues and the Camden Health and Wellbeing Strategy 2022-30 is one of the Council's initiatives to improve the health and wellbeing of Camden residents and reduce health inequalities across the borough.

The Applicant and the project team have fully embraced the sustainability and Net Zero Carbon objectives of the Council and the Mayor of London. They are keen for the proposed development to fully support these objectives and to go further by adopting both mandatory and voluntary standards (such as WELL, WiredScore and Net Zero Carbon) in order to maximise longevity, market relevance and social sustainability, and minimise environmental impact over the buildings' life cycle. The intention of the scheme is to act in support of the Council's sustainability aspirations & commitments for the coming years.

Targeting these accreditations ensures the scheme will provide a good balance of proposals, including a focus on both public and private outdoor amenity, a highly-tuned facade providing passive environmental shading and cooling measures, fossil-fuel free heating/cooling and significant contributions to local biodiversity.

The proposed approach to development combines substantive retention of the existing basement and substructure of Selkirk House and replacement new-build above ground. This approach offers the opportunity to achieve cutting-edge environmental performance for the office space that a refurbishment of the existing building cannot match. This in turn, improves performance of the proposed scheme on a life cycle basis.

The proposed development has been designed to also consider the key policies relating to sustainable design and construction, focusing primarily on the following documents:

- Camden Local Plan 2017
- Camden Planning Guidance (CPG) Energy efficiency and adaptation, January 2021
- CPG Planning for Health and Wellbeing, January 2021
- CPG Biodiversity, March 2018
- The London Plan 2021

This Statement forms part of a suite of sustainability documents that collectively demonstrate how the development proposals have responded to both the Council and the Applicant's sustainability objectives, and its performance against mandatory and voluntary sustainability targets. As such, this document should be read in parallel with the following reports submitted with the planning application:

- Circular Economy Statement
- Energy Statement
- Whole Life Carbon Assessment & Report
- Retention Report

1.2 Development Description

This Sustainability Statement has been prepared in support of the detailed planning application submitted by Lab Selkirk House Ltd ('the Applicant') to the Council for the redevelopment of the land at Selkirk House, 166 High Holborn and 1 Museum Street, 10-12 Museum Street, 35-41 New Oxford Street and 16A-18 West Central Street, London, WC1A 1JR ('the site').

This application relates to a site covered by another application (ref. 2021/2954/P) it is the intention that this application supersedes the previous application which will in turn fall away. This new planning application has been prepared in the context of the recent listing of 10-12 Museum Street and 35-37 New Oxford Street, both of which sit within the application boundary. As a result a listed building application is being submitted alongside the planning application. Whilst the original application gave significant weight to the heritage interest of these now Grade II listed buildings, the applicant wanted the opportunity to properly consider the implications of the listings on the proposals in order to deliver a revised scheme which maximises the heritage benefits of the site.

Following the recent decisions by Historic England, the status of the buildings within the One Museum Street element of West Central Street area of the site is as follows:

Grade II Listed:

- 10-12 Museum Street
- 35-37 New Oxford Street

Certificate of Immunity from Listing granted:

- 39 – 41 New Oxford Street
- 16a West Central Street

- 18 West Central Street
- 16b West Central Street

The proposed development comprises of the following components:

- **Museum Street** - a single new building rising to 19 storeys, providing office (Class E(g)(i)) accommodation on upper levels and a range of flexible town centre uses (Class E) at ground level.
- **High Holborn** - a single new building rising to 6 storeys, providing residential (Class C3) accommodation on upper levels and a flexible town centre use (Class E) at ground level.
- **Vine Lane** - a single new building rising to 5 storeys, providing market residential units with a flexible town centre use (Class E) at ground level.
- **West Central Street** - a series of new and refurbished buildings rising to 6 storeys, providing residential accommodation (market, LCR and Intermediate) on upper levels (Class C3) and flexible town centre uses (Class E) at ground level.

In summary, the proposed development is seeking detailed planning permission for:

- 22,650 sqm (GIA) of office floorspace falling within Class E(g)(i). This will be provided within the Museum Street building.
- 1,481 sqm (GIA) of flexible town centre floorspace at ground floor level falling within Class E. This will be provided within the Museum Street, Vine Lane, High Holborn, and West Central Street buildings. The planning application specifies the range of uses within Class E that each of these units is seeking permission for.
- 3,992 sqm (GIA) of residential floorspace will be provided. This represents an uplift of 2,078 sqm (GIA) of residential floorspace falling within Class C3. This will be provided within the West Central Street, Vine Lane and High Holborn buildings.
- All of the affordable housing component (1,693 sqm GIA) is provided with the West Central Street buildings along with 294 sqm (GIA) of market housing.
- 1,579 sqm (GIA) of market housing is provided within the Vine Lane block with a further 426 sqm (GIA) of market housing being provided within the High Holborn block.
- Two basements which will be used for cycle parking, servicing areas, plant, storage, and other ancillary uses.
- A high proportion of open space across the site totalling 2,201 sqm provided as public realm, pocket parks, communal areas, play space and private amenity for residents and office occupants.
- The creation of new public pedestrian route through the site known as ‘Vine Lane’, which will link High Holborn with West Central Street.

- 465 cycle parking spaces allocated as follows:
 - 345 long stay cycle parking spaces allocated to the office component.
 - 11 long stay cycle parking spaces allocated to the flexible town centre uses floorspace component.
 - 73 long stay cycle parking spaces allocated to the residential component.
 - 36 cycle parking spaces allocated to visitors to the site and located within the public realm areas.
 - 0 vehicle parking spaces.
- A high proportion of open space across the site totalling 2,201 sqm provided as public realm, pocket parks, communal areas, play space and private amenity for residents and office occupants.
- Extensive provision of open space across the site (2,201 sqm) including:
 - 87 sqm for WCS, 130 sqm for VL, 11 sqm for High Holborn of private amenity space.
- In addition to the open space provision within the Applicant’s ownership, 729 sqm of public realm and streetscape improvements outside of the Applicant’s ownership is proposed.

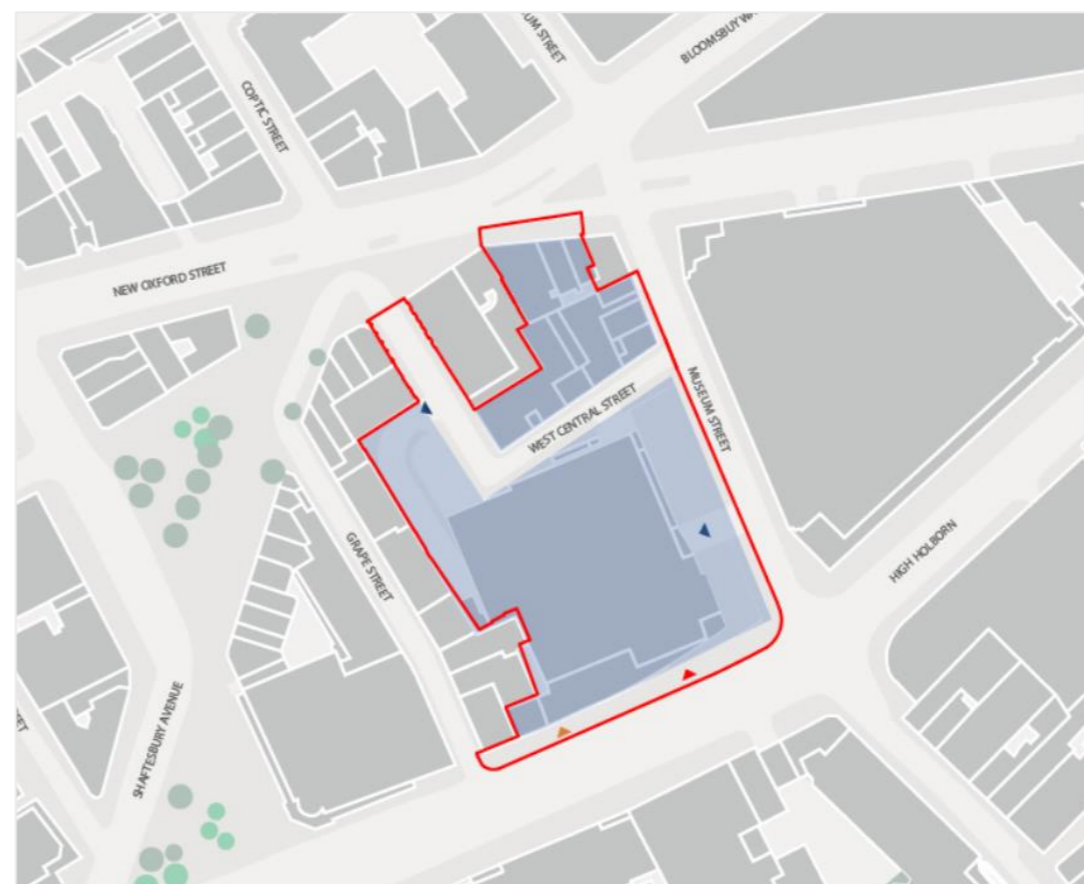


Figure 1.1 – Red line boundary

1.3 Key Sustainability Targets

Based on the aspirations of the Council, the Mayor of London and the Applicant, plus current planning policy requirements, the minimum sustainability targets (mandatory and voluntary) adopted by the proposed development are as follows:

	BREEAM	WELL	Urban Greening Factor	CO ₂ Emissions	WiredScore
Museum Street	Excellent certification (minimum)	Platinum certification	0.3	LETI Net Zero Carbon**	Gold certification (minimum)
Vine Lane	n/a	Principles		GLA Net Zero Carbon	Principles
West Central Street (Refurb)	Excellent certification	Principles			
West Central Street (New)	n/a	Principles			
High Holborn	n/a	Principles			
Site-Wide	n/a	Principles*			

*Applicable principles of WELL Community applied; the project is not eligible for formal certification

**Registered as a LETI NZC Pioneer project

1.4 Summary of Proposed Measures

A comprehensive suite of measures and approaches are proposed to help the proposed development achieve a level of environmental and social sustainability. A summary of the key design principles is provided below:

Table 1.1 – Summary of proposed sustainability measures

Sustainability Issue	Overview of Proposed Measures
Health & Wellbeing	<ul style="list-style-type: none"> – New, safe and inclusive public realm providing a new pedestrian route through the Site. – Extensive urban greening both at ground level and incorporated into the buildings – Safety and security measures with crime designed out as far as practicable. – Measures including strategic planting, street furniture, and building architraves to provide a comfortable external environment – Internal environments designed to align with WELL Building and Community principles; formal certification sought for Museum Street building.
Energy & Carbon	<ul style="list-style-type: none"> – Fossil fuel-free development (heating and hot water) – Thermally efficient fabric, exceeding Part L as far as practicable. – Best practice building services system efficiencies – Passive design measures to manage overheating risk, including solar control and natural ventilation to the office building and apartments where external conditions allow. – Renewable heating and hot water for all uses provided via Air Source Heat Pumps
Climate Resilience	<ul style="list-style-type: none"> – Passive and active design measures to avoid internal overheating risk – Increased urban greening to help manage urban heat island effect through natural shading and transepiration – Sustainable drainage techniques to manage risk of pluvial flooding and reduce burden on the existing sewerage infrastructure. – Water efficiency measures will ensure water demand is reduced at source to achieve BREEAM Excellent minimum standard or 105l/p/d in new build apartments.

	<ul style="list-style-type: none"> - Durable building materials that can withstand extreme weather events reducing the need for maintenance and early replacement
Urban Greening & Biodiversity	<ul style="list-style-type: none"> - New multi-zoned public realm with a range of landscape types and zones, including a Pocket Park - Retain existing trees where feasible to do so. - Green / biodiverse roofs proposed to available roof space across the site. - Urban Greening Factor (UGF) 0.3 achieved in line with London Plan requirements.
Materials & Waste	<ul style="list-style-type: none"> - Retention of existing structural elements where practical and feasible, and where fit for repurpose and can achieve current stringent sustainability targets relating to thermal efficiency. - Life cycle assessments of construction materials and components to aid in the understanding and selection of those with the lowest environmental impact and embodied carbon. - A sustainable procurement plan has been developed for the project, covering all elements of the proposed development. - Waste strategy developed in accordance with circular economy principles and targets for minimising construction and operational waste and promoting reuse before recycling.
Local Impacts	<ul style="list-style-type: none"> - Air quality impact reduced due to the removal of the existing NCP car park with no re-provision (i.e. car free development), fossil fuel free heating/cooling across the Site, and increase in urban greening. - Existing background noise managed through sound-masking from new buildings providing a partial buffer to local road noise, and MEP plant located either below ground or at roof level (within sound attenuated compounds). - Soundscapes through 'quiet' areas, such as courtyard - External lighting designed to minimise night-time light pollution: <ul style="list-style-type: none"> o avoidance of misdirected lighting and up lighting in open areas o lighting curfew hours where non-essential lighting is dimmed or switched off (via automated controls)

Sustainable Travel	<ul style="list-style-type: none"> - Redevelopment of the existing car park for alternative uses bringing multiple environmental, social, and economic benefits to the local area. - Travel Plan setting out measures to promote active travel and increase trips by foot, cycle or public transport. - Improvements to the pedestrian environment and provision of high quality footpaths and pavements (safe and easy, seating, signage, landscaping, adequately lit) - Accessible and secure cycle parking for residents, office workers and visitors. - Provision for facilities that promote cycle usage by office users such as showers, changing rooms, lockers.
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1.5 Conclusion

The Applicant and the project team have fully embraced the sustainability and Net Zero Carbon objectives of the Council and the Mayor of London. They are keen for the proposed development to fully support these and to go further by adopting voluntary standards such as WELL Building Standard, to ensure the health and wellbeing of site users and occupants, and WiredScore, to promote a resilient digital economy.

In addition, the proposed Museum Street office development has adopted the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide and is following, as far as practicable, the measures and indicators as a route to achieving Net Zero Carbon-enabled. To demonstrate the Applicant's level of commitment to enabling NZC, and to support knowledge-sharing of ideas and lessons learned, Museum Street is registered as a LETI Pioneer project and has committed to the KPI of fossil fuel-free heating and hot water.

From the outset the proposed development has been designed to achieve a high level of sustainability performance. The proposals have been carefully considered and robustly developed in consultation with key stakeholders to maximise the potential for multiple environmental and social benefits to be realised. As a result, the proposed development will deliver a new, vibrant place for people to live and work with health and wellness at its core.

The sustainability strategy developed for the project will be reviewed and monitored throughout the design and construction stages, thereby ensuring the aspirations of Camden, the GLA and the Applicant are achieved in practice once the development is complete.

2 Introduction

2.1 Development Description

This application relates to a site covered by another application (ref. 2021/2954/P) it is the intention that this application supersedes the previous application which will in turn fall away. This new planning application has been prepared in the context of the recent listing of 10-12 Museum Street and 35-37 New Oxford Street, both of which sit within the application boundary. As a result a listed building application is being submitted alongside the planning application. Whilst the original application gave significant weight to the heritage interest of these now Grade II listed buildings, the applicant wanted the opportunity to properly consider the implications of the listings on the proposals in order to deliver a revised scheme which maximises the heritage benefits of the site.

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- All of the affordable housing component (1,693 sqm GIA) is provided with the West Central Street buildings along with 294 sqm (GIA) of market housing.
- 1,579 sqm (GIA) of market housing is provided within the Vine Lane block with a further 426 sqm (GIA) of market housing being provided within the High Holborn block.
- Two basements which will be used for cycle parking, servicing areas, plant, storage, and other ancillary uses.
- A high proportion of open space across the site totalling 2,190 sqm provided as public realm, pocket parks, communal areas, play space and private amenity for residents and office occupants.
- 500 cycle parking spaces allocated as follows:
 - o 345 long stay cycle parking spaces allocated to the office component.
 - o 9 long stay cycle parking spaces allocated to the flexible town centre uses floorspace component.
 - o 84 long stay cycle parking spaces allocated to the residential component.
 - o 62 cycle parking spaces allocated to visitors to the site and located within the public realm areas.
 - o 0 vehicle parking spaces.
- Extensive provision of open space across the site (2,190 sqm) including:
 - o 1,083 sqm provided as public realm within the Applicant’s ownership across the site.
 - o 509 sqm provided as communal offices terraces within the Vina Lane and Museum Street buildings.
 - o 186 sqm provided as play space within the West Central Street courtyard, which also provides communal open space for residents of those buildings.

- 195 sqm of communal open space within the Vine Lane block - 74 sqm within the courtyard and 121 sqm at level 4, roof top level.
- 87 sqm for West Central Street and 130 sqm for Vine Lane of private amenity space.
- In addition to the open space provision within the Applicant’s ownership, 729 sqm of public realm and streetscape improvements outside of the Applicant’s ownership is proposed.



Figure 1.1 Red line boundary



Figure 2.2 Proposed scheme overview

2.2 Key Policies and Requirements

The development proposals have been designed with consideration for the key policies relating to sustainable design and construction, focusing primarily on the following documents:

- Camden Local Plan 2017
- Camden Planning Guidance (CPG) Energy efficiency and adaptation, January 2021
- CPG Planning for health and wellbeing, January 2021
- CPG Biodiversity, March 2018
- The London Plan 2021

The key requirements applicable to the proposed development are summarised below.

Sustainability Issue	Policy Reference		Requirements
	Camden Policy & Guidance	The London Plan 2021	
Sustainable Design & Assessment	Policy C1 Health & wellbeing Policy CC2 Adapting to climate change	Policy D8 Public realm Policy D11 Safety, security and resilience to emergency	<ul style="list-style-type: none"> Health Impact Assessment (HIA) and screening to be undertaken early on in design to maximise positive effects on H&W. Home Quality Mark and Passivhaus design standards are encouraged. BREEAM Excellent required for non-domestic developments of 500sqm or above. Public realm designed to be safe, accessible, inclusive, attractive, well-connected, easy to service and maintain. Landscape treatment, planting, street furniture and surface materials should be durable and sustainable. Public realm to promote active and sustainable travel. Ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm. Maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather, fire, flood and related hazards
Energy & Climate Change	Policy CC1 Climate change mitigation CPG Energy efficiency & adaptation	Policy SI 2 Minimising greenhouse gas emissions Policy SI 3 Energy infrastructure Policy SI 4 Managing heat risk	<ul style="list-style-type: none"> Follow the energy hierarchy. Minimum overall CO2 reduction of 35% to be achieved; Target is net zero carbon in operation. Cash-in-lieu contribution will be required for residual onsite CO2. <i>(Note that New London Plan suggests £95 tCO2 calculated against 30 years)</i> Minimum 'lean' (energy efficiency) target of 10% for residential and 15% for non-domestic. Target a 20% reduction in CO2 from onsite renewables Connect to existing heat network where possible. Where substantial demolition is proposed, demonstrate it is not possible to retain and improve. Carry out whole life carbon emissions assessment Monitor and report on energy performance for at least 5 years. Minimise overheating risk in accordance with cooling hierarchy (passive design first; active cooling to be avoided as far as possible). Use CIBSE methodology to demonstrate overheating risk has been reduced as far as possible.
	Policy CC2 Adapting to climate change CPG Energy efficiency & adaptation	Policy SI 3 Energy infrastructure Policy SI 4 Managing heat risk Policy SI 5 Water infrastructure	<ul style="list-style-type: none"> Promote new appropriate green infrastructure and incorporate biodiverse roofs and green walls, where appropriate Engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale development No increase (and where possible a decrease) in surface water runoff through SUDs Measures to reduce impact of urban and dwelling overheating (apply 'cooling hierarchy' and demonstrate mitigation through CIBSE modelling) Incorporate smart metering, water saving and recycling measures
Health & Wellbeing	Policy C5 Safety and security Policy C6 Access for all CPG Planning for health and wellbeing	Policy D5 Inclusive Design	<ul style="list-style-type: none"> Measures that will help contribute to healthier communities and reduce health inequalities should be incorporated in developments. Demonstrate appropriate security and community safety measures in buildings, streets, public spaces and transport systems. All buildings, places and routes between to meet highest practicable standards of accessibility and inclusive design.
Biodiversity + Urban Greening	Policy A3 Biodiversity	Policy G1 Green Infrastructure Policy G4 Open space	<ul style="list-style-type: none"> Developments to incorporate appropriate elements of green infrastructure, additional trees and vegetation wherever possible.

Sustainability Issue	Policy Reference		Requirements
	Camden Policy & Guidance	The London Plan 2021	
		Policy G5 Urban Greening Policy G6 Biodiversity and access to nature Policy G8 Food growing	<ul style="list-style-type: none"> • Where possible create areas of publicly accessible open space, particularly in areas of deficiency. • Achieve an Urban Greening Factor (UGF) of 0.4 for predominantly residential developments, and 0.3 for predominantly commercial. • Secure net biodiversity gain. • Identify potential sites that could be used for food production.
Water Resource Management	Policy CC3 Water and flooding	Policy SI 5 Water infrastructure	<ul style="list-style-type: none"> • Incorporate water efficiency measures to achieve maximum water use rate of 105 l/p/d in dwellings, and BREEAM Excellent equivalent in commercial development • Incorporate smart metering, water saving and recycling measures • Avoid harm to water environment and improve water quality. • Ensure adequate water supply and wastewater infrastructure capacity is provided.
Flood Risk Management	Policy CC3 Water and flooding	Policy SI 12 Flood risk management Policy SI 13 Sustainable Drainage	<ul style="list-style-type: none"> • Incorporate flood resilient measures in areas prone to flooding • Utilise sustainable drainages systems to achieve greenfield runoff rate where feasible • There should be a preference for green over grey features, in line with the drainage hierarchy • Use SUDs that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation. • Utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.
Air, Noise and Light Pollution	Policy CC4 Air quality Policy A4 Noise and vibration	Policy D14 Noise Policy SI 1 Improving air quality	<ul style="list-style-type: none"> • Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. • Development proposals must be at least Air Quality Neutral • Mitigation measures required where a development would cause harm • Construction dust and emissions to be assessed. • Have regard for Camden’s Noise and Vibration Thresholds and apply appropriate attenuation measures where required • Improve and enhance the acoustic environment and promote appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
Waste Management	Policy CC5 Waste	Policy SI 7 Reducing waste and supporting the circular economy	<ul style="list-style-type: none"> • Include flexible, accessible facilities for the storage and collection of waste and recycling. <i>(Camden targets are to increase recycling and the reuse of materials to meet the London Plan targets)</i> • Help enable achievement of Mayor’s waste targets: zero biodegradable or recyclable waste to landfill by 2026; municipal waste recycling target of 65% by 2030; 95% recycling/recovery rate of excavation, construction & demolition waste. • Developments should aim to be net zero waste. • Submit a Circular Economy statement to demonstrate how waste will be managed, targets will be met, waste monitored, etc.
Sustainable Transport	Policy T1 prioritising walking, cycling and public transport Policy T2 Parking and car-free development	Policy T1 Strategic approach to transport Policy T2 Healthy Streets Policy T5 Cycling Policy T6.1 Residential Parking	<ul style="list-style-type: none"> • Support Mayor’s target of 80% of all trips by foot, cycle or public transport by 2041 • Improve the pedestrian environment and provide high quality footpaths and pavements (safe and easy, seating, signage, landscaping, adequately lit) • Demonstrate improvements that support the ten Healthy Streets Indicators • Connected, convenient and safe cycle routes • Accessible and secure cycle parking • Provision for facilities that promote cycle usage such as showers, changing rooms, lockers. • Camden will limit onsite parking to disabled users and essential operational or servicing needs, and will support the redevelopment of existing car parks for alternative uses.

2.3 Planning Authority Aspirations

Camden Council and the Mayor of London have declared a ‘Climate Emergency’, with Camden’s declaration including an ‘Ecological Emergency’. Both have an aspiration to achieve a Net Zero Carbon borough and city by 2030, 20 years ahead of the national target. It is expected that both new development and refurbishments will actively contribute to this.

In June 2020, Camden approved a 5-year ‘Climate Action Plan’ which creates a framework for action across all aspects of the borough with the aim of achieving zero carbon by 2030. Objectives and actions that affect the proposed development include:

- From 2020, require all major developments in Camden to be zero carbon (London Plan definition)
- From 2020, require all major developments in Camden to calculate whole life carbon emissions to include all operational and embodied carbon.
- Public spaces will encourage and enable healthy and sustainable travel choices and promote biodiversity.
- Enable electric transport with infrastructure and incentives

Health and wellness are critical social issues and the Camden Health and Wellbeing Strategy 2022-30 is one of the Council’s initiatives to improve the health and wellbeing of Camden residents and reduce health inequalities across the borough.

2.4 Project Team Aspirations

The Applicant and the project team have fully embraced the strategic objectives of Camden and the Mayor of London. They are keen for the proposed development to fully support these and to go further by adopting voluntary standards such as WELL Building Standard, to ensure the health and wellbeing of site users and occupants, and WiredScore to ensure a resilient digital economy.

In addition, the proposed Museum Street office development has adopted the London Energy Transformation Initiative (LETI) Climate Emergency Design Guide and is following, as far as practicable, the measures and indicators as a route to enabling Net Zero Carbon operational energy. To demonstrate the Applicant’s level of commitment to achieving NZC, and to support knowledge-sharing of ideas and lessons learned, Museum Street is registered as a LETI Pioneer¹ project and has committed to the KPI of fossil fuel-free heating, cooling, and hot water.

¹ <https://www.leti.london/leti-pioneers>

2.5 Key Sustainability Targets

Based on the Applicant’s aspirations and current planning policy requirements listed under 2.2.1, the proposed development sustainability targets (mandatory and voluntary) are as follows:

	BREEAM	WELL	Urban Greening Factor	CO ₂ Emissions	WiredScore
Museum Street	Excellent certification (minimum)	Platinum certification	0.3	LETI Net Zero Carbon**	Gold certification (minimum)
Vine Lane	n/a	Principles		GLA Net Zero Carbon	Principles
West Central Street (Refurb)	Excellent certification	Principles			
West Central Street (New)	n/a	Principles			
High Holborn	n/a	Principles			
Site-Wide	n/a	Principles*			

*Applicable principles of WELL Community applied; the project is not eligible for formal certification

**Registered as a LETI NZC Pioneer project

2.6 Supporting Information

This sustainability statement should be read in conjunction with the documentation forming the planning application, but in particular:

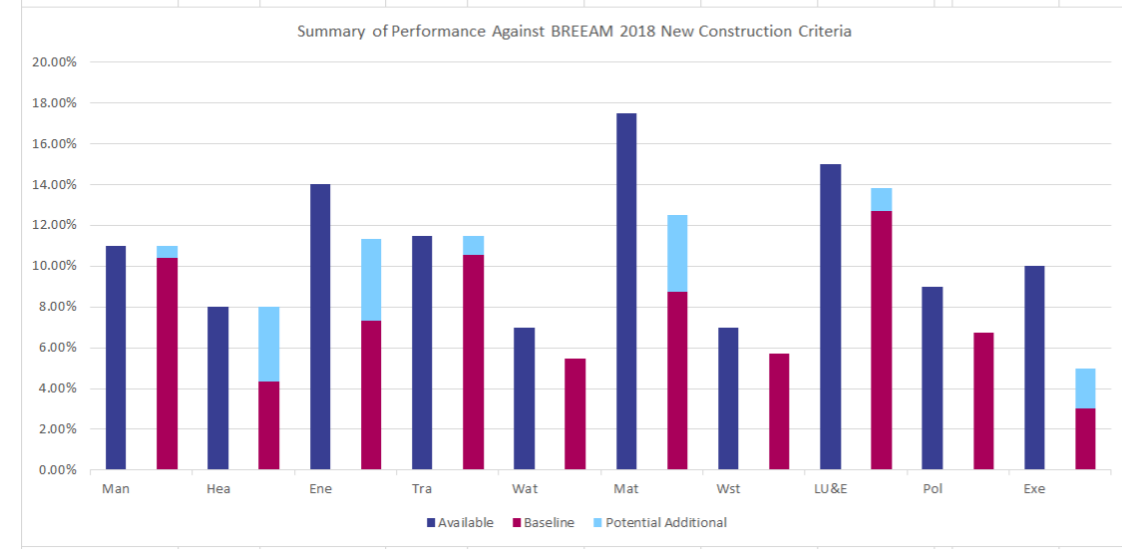
- Design & Access Statement
- Planning Statement
- Air Quality Assessment
- Noise Impact Assessment
- Circular Economy
- Whole Life Carbon Assessment
- Energy Statement
- Retention Report

3 BREEAM

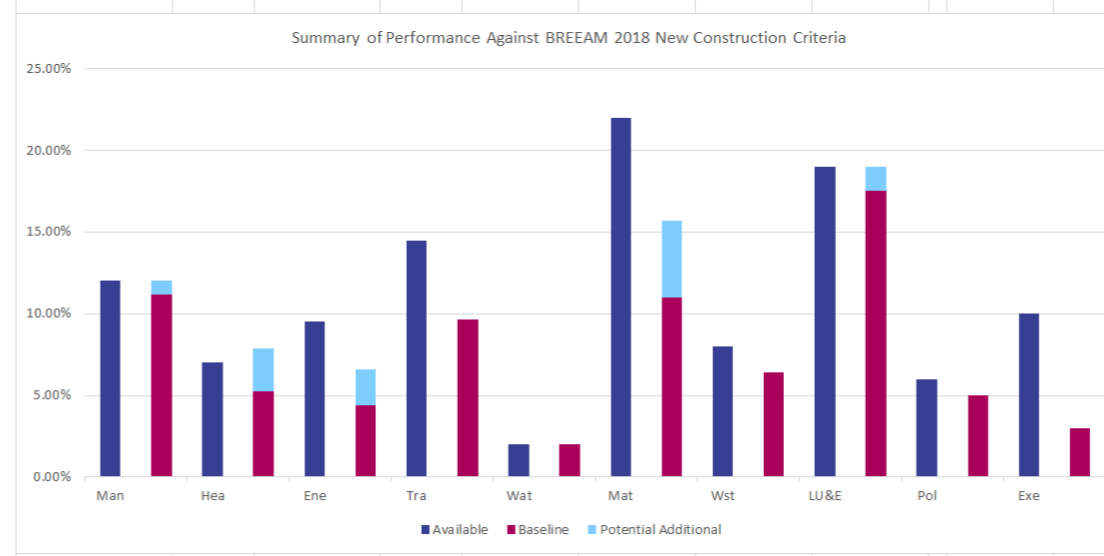
The proposed development is currently on track to achieve the minimum target of BREEAM Excellent for each of the elements being assessed: The office building, the retail element, and the West Central Street residential refurbishment scheme.

Summaries of the current performance are shown below for the office, retail and refurbishment residential schemes.

1 Museum Street									
BREEAM 2018 NEW CONSTRUCTION - Office Shell and Core									
Rev: 01 04/10/2022									
ScotchPartners									
SUMMARY OF PERFORMANCE & RATING									
Assessment Section	Credits Available	Section Weighting	Credit Value	Credits Targeted		TargetedScore		BREEAM Rating	% Score
				Baseline	Potential Additional	Baseline	Potential Additional		
Management	18	11%	0.61%	17	1	10.39%	0.61%	Outstanding	85
Health & Wellbeing	11	8%	0.73%	6	5	4.36%	3.64%	Excellent	70
Energy	21	14%	0.67%	11	6	7.33%	4.00%	Very Good	55
Transport	12	12%	0.96%	11	1	10.54%	0.96%	Good	45
Water	9	7%	0.78%	7	0	5.44%	0.00%	Pass	30
Materials	14	18%	1.25%	7	3	8.75%	3.75%	Unclassified	<30
Waste	11	7%	0.64%	9	0	5.73%	0.00%		
Land Use & ecology	13	15%	1.15%	11	1	12.69%	1.15%		
Pollution	12	9%	0.75%	9	0	6.75%	0.00%		
Innovation	10	10%	1.00%	3	2	3.00%	2.00%		
Expected BREEAM Score						74.99%	91.10%		
Expected BREEAM Rating						Excellent	Outstanding		



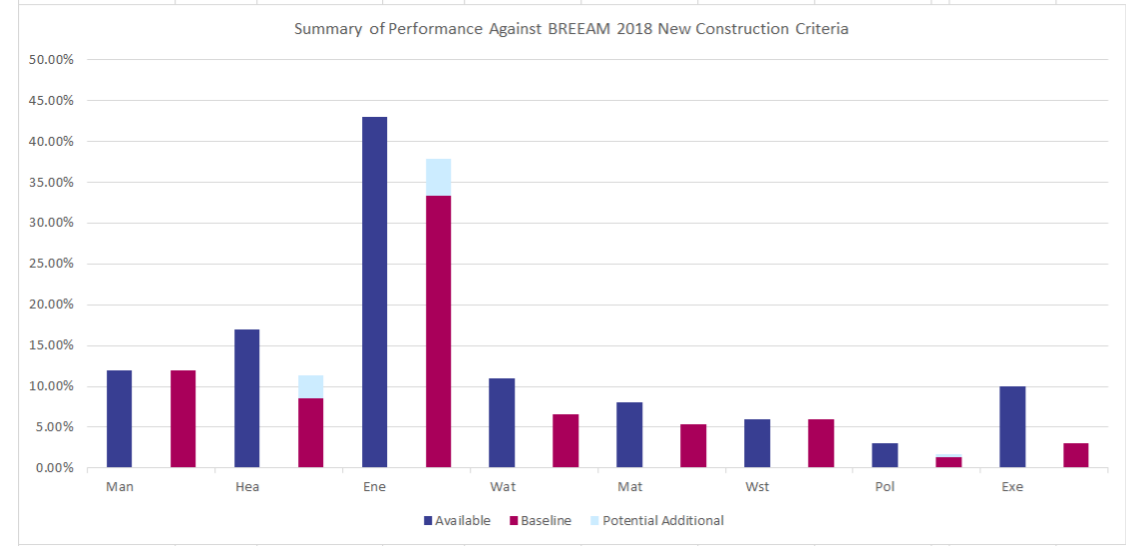
1 Museum Street - Retail									
BREEAM 2018 NEW CONSTRUCTION - Retail Shell Only									
Rev: 02 04/10/2022									
ScotchPartners									
SUMMARY OF PERFORMANCE & RATING									
Assessment Section	Credits Available	Section Weighting	Credit Value	Credits Targeted		TargetedScore		BREEAM Rating	% Score
				Baseline	Potential Additional	Baseline	Potential Additional		
Management	15	12%	0.80%	14	1	11.20%	0.80%	Outstanding	85
Health & Wellbeing	8	7%	0.88%	6	3	5.25%	2.63%	Excellent	70
Energy	13	10%	0.73%	6	3	4.38%	2.19%	Very Good	55
Transport	12	15%	1.21%	8	0	9.67%	0.00%	Good	45
Water	2	2%	1.00%	2	0	2.00%	0.00%	Pass	30
Materials	14	22%	1.57%	7	3	11.00%	4.71%	Unclassified	<30
Waste	10	8%	0.80%	8	0	6.40%	0.00%		
Land Use & ecology	13	19%	1.46%	12	1	17.54%	1.46%		
Pollution	6	6%	1.00%	5	0	5.00%	0.00%		
Innovation	10	10%	1.00%	3	0	3.00%	0.00%		
Expected BREEAM Score						75.44%	87.23%		
Expected BREEAM Rating						Excellent	Outstanding		



West Central Street
 BREEAM 2014 DOMESTIC REFURBISHMENT
 Rev: 01 18/02/2021
 ScotchPartners
 Building Services Engineering | Sustainability | Acoustics

SUMMARY OF PERFORMANCE & RATING

Assessment Section	Credits Available	Section Weighting	Credit Value	Credits Targeted		TargetedScore		BREEAM Rating	% Score
				Baseline	Potential Additional	Baseline	Potential Additional		
Management	11	12%	1.09%	11	0	12.00%	0.00%	Outstanding	85
Health & Wellbeing	12	17%	1.42%	6	2	8.50%	2.83%	Excellent	70
Energy	29	43%	1.48%	22.5	3	33.36%	4.45%	Very Good	55
Water	5	11%	2.20%	3	0	6.60%	0.00%	Good	45
Materials	48	8%	0.17%	32	0	5.33%	0.00%	Pass	30
Waste	5	6%	1.20%	5	0	6.00%	0.00%	Unclassified	<30
Pollution	9	3%	0.33%	4	1	1.33%	0.33%		
Innovation	10	10%	1.00%	3	0	3.00%	0.00%		
Expected BREEAM Score						76.13%	83.74%		
Expected BREEAM Rating						Excellent	Excellent		



4 Health & Wellbeing

4.1 Key Issues

Camden’s 5-year Climate Action Plan includes a requirement whereby “public spaces will encourage and enable healthy and sustainable travel choices and promote biodiversity”.

The physical health & mental wellbeing of people is a complex connected and inter-dependent system, affected by genes, social and economic circumstances, the quality of relationships and the value and purpose of work. Wellness is greatly affected by our physical environment, both indoors and outdoors, and by our connection to nature. Promoting societal health and wellbeing will enable communities and individuals to live healthy, happy lives.

For the proposed development this means ensuring users, visitors and local people have access to healthy workspaces, good access to amenities, sustainable transport options, and open green space for recreation and relaxation.

Many factors have been considered to promote physical and mental health and wellbeing:

- Access to natural amenity e.g. good air quality, daylight and sunlight
- Access to nature (internal and external): greening and biophilia, natural materials, images of nature
- Comfort conditions (internal and external): temperature, humidity, noise, odours
- Inclusive and accessible spaces (internal and external)
- Security and safety
- Sense of place and belonging
- Spaces that enable physical fitness and/or mindfulness
- Access to knowledge: data, news, local information, etc

4.2 Application Response: Site-Level

A Health Impact Assessment (HIA) has been prepared to identify any potential effects on the health and well-being of the new and existing population and occupiers, arising from the proposed development, taking account of the key determinants of health. Where an impact is identified, actions and measures are recommended to mitigate an adverse impact or enhance or secure a positive impact.

The results of the HIA conclude that the proposed development achieves the objective of creating a healthy, successful place for people to live and work in, and that no negative impacts to health have been identified following the implementation of suggested mitigation.

Several of the proposed measures have been guided by features set out in the WELL Community assessment standard; however formal certification is not being pursued due to the site not being eligible.

Proposed Measures
Provision of a new development which will draw new occupants and users to the local area who will support existing local retail businesses thereby boosting the local economy.
Make a positive contribution to local housing needs by providing a proportion of affordable residential dwellings (44 units).
The existing site will be opened up to create new through-routes for pedestrians, thereby increasing the accessibility and safety of the new site and the surrounding area. Wayfinding measures to be incorporated into the public realm design.
Advice provided by a security specialist on measures to design out crime and promote safety around the site.
Traffic will be separated from public realm and from pedestrian routes as far as practicable.
Primary strategy is for service and delivery vehicles to access the site via a vehicle lift to the basement loading bays.
The opening up of the site enables a new multi-zoned public realm to be created. The following form part of the ongoing design: <ul style="list-style-type: none"> ▪ Private and public outdoor space ▪ Where possible, access to daylight and sunlight, i.e. areas free of building shadow for part or most of the day. ▪ Comfort from potential wind tunnel effect through building articulation, and strategic positioning of trees, planting and street furniture ▪ Access for all (i.e. inclusive design) ▪ Landscaped spaces for relaxation and mindfulness. ▪ Sense of place and belonging.
Extensive and varied soft landscaping will enable access to nature (refer to Chapter 6 Urban Greening and Biodiversity) and provide cooling of the microclimate (i.e. urban heat island) through vegetation and tree cover.
Impacts of noise, air quality, and other environmental indicators reduced or mitigated through best practice management measures.

A high proportion of open space across the site totalling 2,201 sqm provided as public realm, pocket parks, communal areas, play space and private amenity for residents and office occupants.

Replacement of operational car park (193 spaces, brought back into meanwhile use)

Access to indoor biophilia (e.g. greening) and nature (e.g. through natural materials such as wood, stone, etc) in both office buildings

Extensive provision of open space across the site (2,201 sqm) including 87 sqm for West Central Street, 130 sqm for Vine Lane, 11 sqm for High Holborn of private amenity space

Acoustic treatment of glazing to reduce noise ingress to within acceptable (Camden policy) levels.

Advice provided by a security specialist on measures to design out crime and promote safety to both commercial buildings and to residential buildings.

Passive-led measures to ensure internal comfort is maintained as efficiently as possible, thereby reducing cost to the user and energy consumption.

4.3 Application Response: Building-Level

Proposed Measures

WELL Building Standard 'Platinum' rating to be targeted for Museum Street. Principles of WELL applied elsewhere.

Good access to daylight with glazing maximised across all buildings where possible and appropriate (and not in conflict with overheating and thermal performance requirements), and open plan layouts to office spaces.

Access to natural ventilation through operable panels in Museum Street (can be operated by building users).

Measures to ensure the mixed mode ventilation systems at Museum Street are used appropriately, i.e. to avoid risk of poor indoor comfort or air quality, and to avoid unnecessary use of cooling/heating.

- Window contactors which inhibit the operation of the heating and cooling systems when the windows are open are proposed to both Museum Street.
- User training and management will be provided once the buildings are in operation
- Other 'smart technologies' are being considered.

Apartments within Vine Lane and West Central Street will be provided with openable windows, mainly for purge ventilation purposes. Where window openings face inwards to the internal courtyard or onto West Central Street, it is assumed these can be used for natural ventilation and natural cooling purposes.

High Holborn apartments will have openable windows for purge and cleaning purposes only.

Indoor air quality will be ensured for West Central Street new building apartments. The scheme is to have at least one fresh air duct connection on the courtyard side for all flats, with the exhaust to the main street.

Commercial building users will have access to outdoor space (terraces and/or public realm) and to nature via planting

5 Energy and Carbon

5.1 Key Issues

5.1.1 Road to Zero Carbon

With an emphasis on the global climate crisis many local authorities (including Camden and GLA), institutions and businesses have declared a ‘Climate Emergency’. There is a growing commitment to achieving Net Zero Carbon (NZC) buildings by 2030, meaning many new developments need to consider now how far they can go to design in features to enable the lowest carbon performance possible.

The energy strategy for the proposed development will need to follow the energy hierarchy of, ‘Be Lean’, ‘Be Clean’, ‘Be Green’, and ‘Be Seen’ as set out within the London Plan 2021. At each stage of the hierarchy the proposed development’s CO₂ emissions are evaluated and the percentage reduction achieved for the measures applied are reported via the energy statement. The London Plan sets the following targets:

Domestic development	→	Zero carbon (minimum 35% achieved on-site)
	→	10% reduction through ‘Lean’ measures
Non-domestic development	→	Zero carbon (minimum 35% achieved on-site)
	→	15% reduction through ‘Lean’ measures
Total development	→	Zero carbon (minimum 35% achieved on-site)

For full details of the proposed energy strategy please refer to the Energy Statement submitted with this application.

5.1.2 Whole Life Carbon

The London Plan 2021 Policy SI 2 sets out a requirement for developments to calculate and reduce Whole Life Carbon (WLC). WLC emissions are the carbon emissions resulting from the materials, construction, and the use of a building over its entire life, including its demolition and disposal. A WLC assessment provides a true picture of a building’s carbon impact on the environment. For full details see the WLCA Report and GLA template.

5.1.3 Overheating

For context, this chapter addresses internal overheating i.e. within domestic and non-domestic spaces. External overheating is addressed with Chapter 6 covering Climate resilience.

5.2 Net Zero Carbon


The Applicant has confirmed their intentions for Museum Street to target Net Zero Carbon-enabled.

A review study has been carried out of the design measures and indicators which would need to be considered in order for the building to aim towards Net Zero Carbon-enabled. The study is based on the measures set out in London Energy Transformation Initiative (LETI) Climate Emergency Design Guide (for office buildings) which was published in January 2020.

The Guide's definition of Net Zero Carbon relates to whole life carbon i.e. both operational carbon and embodied carbon. At this stage only operational carbon and energy use intensity has been considered in terms of a target, which is in line with the London Plan’s definition of Net Zero Carbon. However, embodied carbon has been evaluated through the Whole Life Cycle Carbon Assessment (refer to the WLCA and report provided with this application).

LETI’s definition of operational carbon is:

Operational Carbon



A new building with net zero operational carbon does not burn fossil fuels, is 100% powered by renewable energy, and achieves a level of energy performance in-use in line with national climate change targets.

The NZC study outlines the potential route to enabling Net Zero Carbon at Museum Street and is to be used as an aide memoir for the design team. The measures and indicators identified are taken from the LETI Design Guide; however, it is acknowledged that the Guide will evolve over time through feedback and contributions from the industry.

Due to the efforts being made by the project team in this area, Museum Street is registered as LETI ‘Pioneer Project’ and is part of the network of other projects aspiring for Net Zero Carbon.

5.3 Energy Reduction Measures

The Applicant is committed to reducing energy demand and CO₂ emissions related to the proposed development. The following measures are proposed to that effect.

5.3.1 Be Lean – Reduce Energy Demand

Whilst the measures differ slightly across the 4 site components, in general the following key demand reduction measures and principles have been adopted:

- High performance building fabric, improving upon Part L U-values and air permeability rate.
- Consideration for appropriate glazing to solid ratio, balanced with requirements for daylighting, views out, and commercial marketing requirements.
- Provision of a means of natural ventilation where external conditions allow
- Mechanical ventilation with high efficiency heat recovery.
- Low energy lighting with occupancy sensing and daylight dimming controls

5.3.2 Be Clean – Supply Energy Efficiency

There are no existing heat networks within 1km of the Site.

The Museum Street and Vine Lane site components will be served by an onsite single communal energy centre with heating plant that will distribute heat to these components via heat network. The West Central Street site component is also proposed to be served by an onsite communal energy centre distributing heat to all units within this site area via a heat network.

Both heat networks will be designed to facilitate interconnection between the two networks and future connection to off-site networks.

5.3.3 Be Green – Use Renewable Energy

The Development will be fossil fuel free for heating and hot water.

An appraisal of available renewable energy solutions has been carried out, which has identified Air Source Heat Pumps as the most appropriate technology for the Development. PV has been discounted due to the lack of suitable available roof space.

5.4 LETI net zero carbon

The Applicant is keen for Museum Street, as the largest building on the proposed site, to target Net Zero Carbon through achieving a Net Zero Carbon balance between on and offsite measures, prioritising the former. Appropriate offsite methods are currently being explored.

A review has been carried out by the project team of the design measures and indicators which should be considered in order for Museum Street to aim towards Net Zero Carbon. The review is based on the measures set out in London Energy Transformation Initiative (LETI) Climate Emergency Design Guide (for office buildings) which was published in January 2020. The Guide's definition of Net Zero Carbon relates to whole life carbon i.e. both operational carbon and embodied carbon. At this stage, Museum Street is focusing on operational carbon, as per LETI's definition:

Operational Carbon



A new building with net zero operational carbon does not burn fossil fuels, is 100% powered by renewable energy, and achieves a level of energy performance in-use in line with national climate change targets.

The proposed energy strategy includes applicable and appropriate measures and indicators from the LETI Design Guide; however, it is acknowledged that the Guide will evolve over time through feedback and contributions from the industry.

Due to the efforts being made by the Applicant in this area, Museum Street is registered as LETI 'Pioneer Project' and is part of the network of other projects aspiring for Net Zero Carbon.

5.5 Performance against reduction targets

The performance against policy targets has been calculated using the Part L 2021 GLA carbon emissions reporting spreadsheet v2.0_0. Due to the size and format of the Excel workbook it is not appropriate to append the completed document to this energy statement. It has instead been provided under separate cover to GLA and to the local authority to review in parallel with the information presented in this report.

The regulated CO₂ savings from each stage of the energy hierarchy and total cumulative performance is shown on the following pages.

5.5.1 Domestic refurbishment CO₂ savings

Both the block on New Oxford Street and the block in 10-12 Museum Street (within the West Central Street part of the development) are refurbished. Whilst the targets are not applicable to domestic refurbishments, the 10% lean target has been adopted and exceeded and the overall performance exceeds the minimum 35% level.

Table 5.1 – Regulated carbon dioxide savings from each stage of the energy hierarchy for the domestic

	Regulated domestic carbon dioxide savings	
	(Tonnes CO ₂ per annum)	(%)
Be lean	2.7	14
Be clean	0.0	0
Be green	13.6	69
Cumulative on site savings	16.3	82
Annual savings from off-set payment	3.5	-
	(Tonnes CO₂)	
Cumulative savings for off-set payment	104	

*Figures are rounded in the GLA spreadsheet

5.5.2 Domestic new build CO₂ savings

The 10% lean target for West Central Street, Vine Lane and High Holborn has been exceeded and the overall performance exceeds the minimum 35% level and the 50% stretch target.

Table 5.2 - Regulated carbon dioxide savings from each stage of the energy hierarchy for the domestic new build

	Regulated domestic carbon dioxide savings	
	(Tonnes CO ₂ per annum)	(%)
Be lean	5.4	16
Be clean	0.0	0
Be green	21	61
Cumulative on site savings	26.4	77
Annual savings from off-set payment	8.1	-
	CO₂ savings off-set (tonnes CO₂)	
Cumulative savings for off-set payment	242	

*Figures are rounded up/down in the GLA spreadsheet

5.5.3 Non domestic refurbishment CO₂ savings

The Class E units at 10-12 Museum Street and 35-41 New Oxford Street will be refurbished. Whilst the targets are not applicable to refurbishments, the 10% lean target has been adopted and exceeded and the overall performance exceeds the minimum 35% level.

Table 5.3 – Regulated carbon dioxide savings from each stage of the energy hierarchy for the non-domestic refurbishment

	Regulated non-domestic carbon dioxide savings	
	(Tonnes CO ₂ per annum)	(%)
Be lean	1.3	38
Be clean	0.0	0
Be green	0.1	4
Cumulative on site savings	1.4	42
Annual savings from off-set payment	2	-
	(Tonnes CO₂)	
Cumulative savings for off-set payment	60	

*Figures are rounded in the GLA spreadsheet

5.5.4 Non-domestic new build CO₂ savings

On a site-wide scale, the 15% lean target saving and the overall 35% saving targets have not been met.

Table 5.4 – Regulated carbon dioxide savings from each stage of the energy hierarchy for the new build non-domestic

	Regulated non-domestic carbon dioxide savings	
	(Tonnes CO ₂ per annum)	(%)
Be lean	8.3	12
Be clean	0.0	0
Be green	7.4	10
Cumulative on site savings	15.6	22
Annual savings from off-set payment	56.3	-
	(Tonnes CO₂)	
Cumulative savings for off-set payment	1,688	

*Figures are rounded up/down in the GLA spreadsheet

In their Energy Assessment Guidance cover note of June 2022, the GLA acknowledge that non domestic buildings may find it more challenging to achieve significant on-site carbon reductions beyond Part L 2021 to meet both the energy efficiency target and the minimum 35% improvement. This is because the new Part L baseline now includes low carbon heating for non-

residential developments but not for residential developments. Every effort has been made to comply with the requirements for the non-domestic areas.

5.5.5 Total development CO₂ savings

The overall development performance exceeds the minimum 35% overall savings target.

Table 5.5 – Regulated carbon dioxide savings from each stage of the energy hierarchy for the whole development

	Total regulated emissions (Tonnes CO ₂ /a)	CO ₂ savings (Tonnes CO ₂ /a)	Percentage savings (%)
Part L 2021 baseline	129.6		
Be lean	111.8	17.7	14
Be clean	118.8	0.0	0
Be green	69.8	42.0	32
Total savings		59.8	46
CO₂ savings off-set (tonnes CO₂)			
Cumulative savings for offset payment		2093.5	

*Figures are rounded up/down in the GLA spreadsheet

Figure 5.1 – Regulated carbon dioxide savings from each stage of the energy hierarchy for the total domestic areas

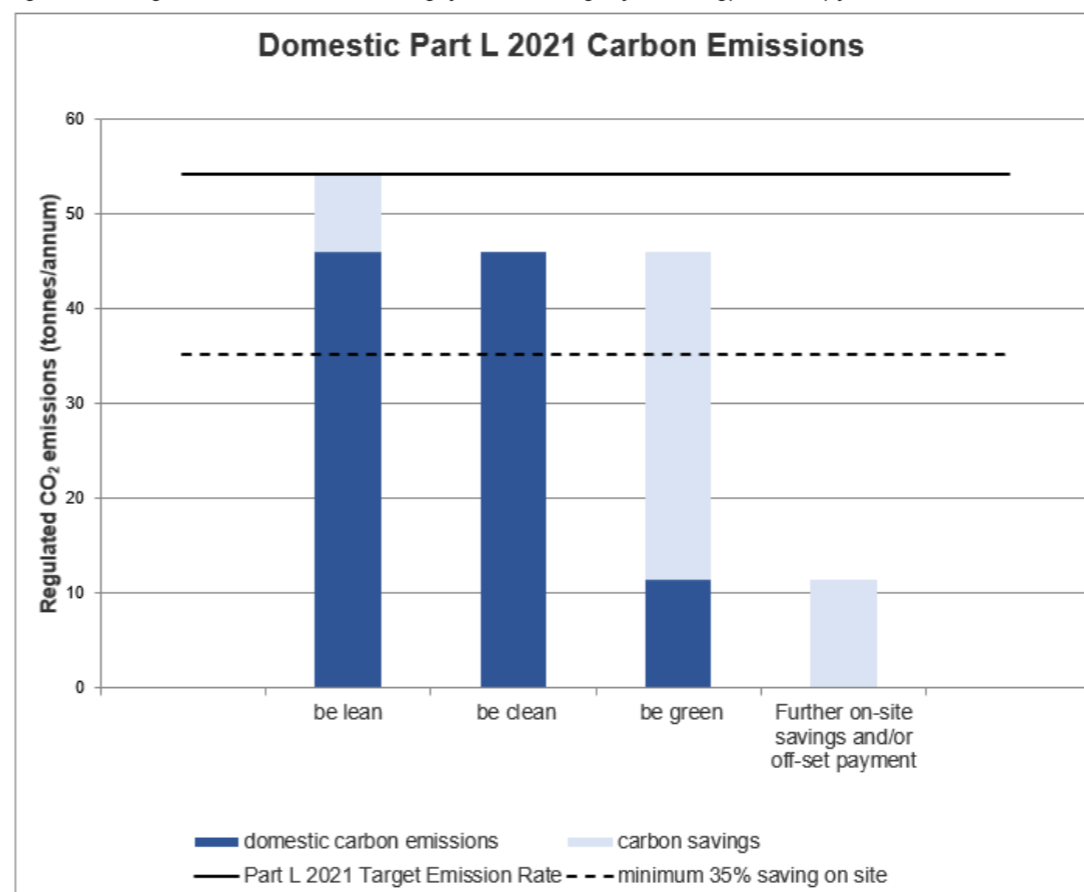


Figure 5.2 - Regulated carbon dioxide savings from each stage of the energy hierarchy for the total non-domestic areas

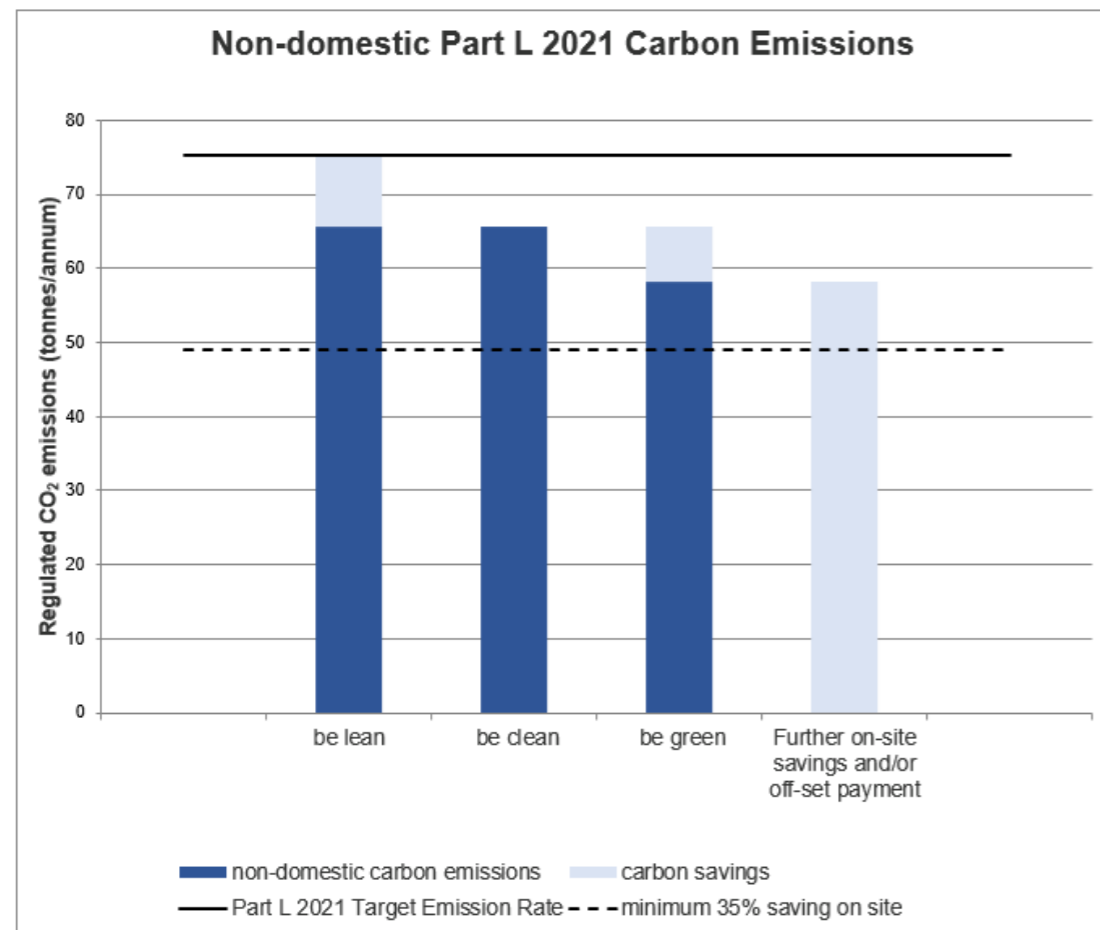


Table 5.6 - WLCA Results

	Upfront Embodied Carbon (Module A) (kgCO2e/m2 GIA)	Embodied Carbon (Modules A-C exc. B6&B8) (kgCO2e/m2 GIA)
1 Museum Street	752	1194
High Holborn	822	1258
West Central Street	581	934
Vine Lane	904	1258
Total	747	1173

5.6 Carbon offsetting

The Council’s preferred mechanism for carbon offsetting is a payment into the Camden Climate Fund. The Applicant proposes to consult with the Planning Authority during the submission period to agree a method for off-setting the residual development CO₂ emissions to achieve the Net Zero Carbon target.

5.7 Whole Life-Cycle carbon emissions

The New London Plan Policy SI 2 requires development proposals to calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment (WLCA) and to demonstrate actions taken to reduce life-cycle carbon emissions. A Whole Life-Cycle Carbon Assessment has been carried out following the GLA guidance document Whole Life-Cycle Carbon Assessments (March 2022) in accordance with BS EN 1578, with additional guidance from RICS Professional Statement. This assessment was completed using the GLA approved oneclick software tool. The results are summarised below with full details provided in the WLCA report that has been submitted with the planning application.

6 Climate Resilience

6.1 Key Issues

Camden Council and the Mayor of London have both declared a Climate Emergency.

The UK’s second Climate Change Risk Assessment (CCRA)² was published in January 2017 by the government. It identifies the following key risks for UK where more action is needed:

- Risks to health, well-being and productivity from prolonged high temperatures causing overheating;
- Risks of shortages in the public water supply, and for agriculture, energy generation and industry, with impacts on freshwater ecology;
- Flooding risks to communities, businesses and infrastructure;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade.

The risks to buildings in urban locations mainly relate to rising temperatures and changing rainfall patterns, which are exacerbated by extreme weather events that are hard to predict and therefore manage. Designing for climate resilience is becoming increasingly common and we as a team must consider it a duty of care to ensure as far as possible the proposed development remains safe and fit for purpose throughout its lifespan, regardless of the climate.

Design measures to enable the site and the buildings to adapt to changes in climate have been explored throughout this document and as such climate change adaptation is not considered as a stand-alone issue. However, measures to specifically manage risks relating to external overheating, water supply and flooding are discussed in this chapter. Note that urban greening and biodiversity are discussed in other chapters within this Statement.

6.2 Climate Change Adaptation Risk Assessment

As part of the BREEAM assessments being carried out for various scheme elements, the project team reviewed how the building structure and fabric could be designed to be resilient to climate change. This involved assessing the risks over the predicted lifespan of the building - to both the building fabric and the structure - from expected extreme weather conditions arising from climate change and, where feasible, mitigate against these risks.

6.3 External Overheating

This chapter addresses external overheating i.e. within the public realm and other outdoors spaces. Internal overheating is addressed within the Energy and Carbon chapter but is also referenced within the Health and Wellbeing Chapter.

The Urban Heat Island is a phenomenon whereby urban temperatures are higher than the surrounding, less dense areas due to heat being stored and ‘trapped’ within building structures and infrastructure. The result is urban centres being warmer than the surrounding, less urban areas, especially at night when the heat is released. Consequently, overheating of the external environment, as well as the internal environment, needs to be addressed.

6.3.1 Application Response

Proposed Measures
Trees and shrubs provided as part of the landscaping strategy will provide protection from both heat and UV radiation by direct shading to both the buildings and outdoor spaces.
The trees, green roofs and other soft landscaping will also provide evapotranspiration (the movement of water from a plant to the air) which in turn cools the local environment.
Vegetation can also control the microclimate by converting solar radiation to latent heat.
The use of light-coloured paving and building materials with a high Solar Reflectivity Index (SRI) are being considered; these will help to reflect heat rather than absorbing it.
The landscaping design will incorporate features such as green infrastructure and street furniture that allow for gentle air flow and passage through spaces, which will help users to feel cooler.

²https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf

6.4 Water Supply

It is the intention of the Applicant to incorporate site-wide water economy measures to enable potable water demand to be reduced across the proposed development. The water conservation strategy will include both internal and external water uses.

Various water economy measures can be implemented in order to reduce the demand for mains water. Reducing demand for water not only reduces the burden on mains supply, it subsequently reduces the volume of wastewater requiring disposal. In particular, where foul water is discharged to sewers, it can reduce the burden on the local drainage network and at the treatment facility, thereby providing a double benefit in terms of resource use, including energy, and environmental impact.

Water efficient sanitaryware is the most cost-effective means of reducing water demand at source and will be applied across all buildings to achieve water use targets. The efficiency performance of the water economy proposals have been tested using BREEAM and Building Regulations Part G calculation tools.

The use of a water reuse system, such as rainwater and greywater recycling, has been investigated. However due to limited space availability within the basement due to essential building services plant, extensive cycle storage space and associated facilities (showers, WCs, lockers), and back of house uses, there is insufficient space to accommodate water reuse tanks and equipment.

6.4.1 Application Response

Proposed Measures
Bathrooms / Washrooms / Superloos and non-domestic showering facilities will be installed with water efficient sanitaryware (e.g. low flush WCs, low flow taps and showers, etc.)
Collectively these will achieve a maximum use rate of: <ul style="list-style-type: none"> ▪ BREEAM Excellent minimum standard for office and retail, and the WCS flats being assessed under BREEAM Domestic Refurbishment ▪ 105 l/p/d for new build apartments (Vine Lane, HH and WCS)
Where water-consuming appliances to the residential dwellings are specified, these will have the highest rating of efficiency.
Drought tolerant plant species will be specified where appropriate.
Where irrigation is required for soft landscaping, this will either be carried out manually or using an automated system connected to rain and moisture sensors.

6.5 Flood Risk and Drainage

Surface water flooding is an immediate risk for any site in central London. Pluvial flooding tends to occur following intense rainfall events when water cannot soak into the ground or enter drainage systems.

The site is currently protected by fluvial (river) flooding from the Thames by the Thames Barrier. The Thames Estuary 2100 Plan is currently being developed to set out how tidal flood risk can be managed from now until the end of the century.

A Flood Risk Assessment has been carried out by ARUP. Based on EA information on flood risk from rivers and the sea (fluvial and tidal), the area within which the proposed development is located has been assessed to be Low Risk. This risk level is allocated on the basis that there is potential for the site to flood during a 1 in 1000 year event.

The risk of surface water flooding and ground water flooding on the site is low. It is recognised that there are areas of ground water flooding risk within 100m of the site and has been taken into account in the below ground drainage strategy.

In conclusion, the site has been assessed as being of low risk from flooding occurring from all sources.

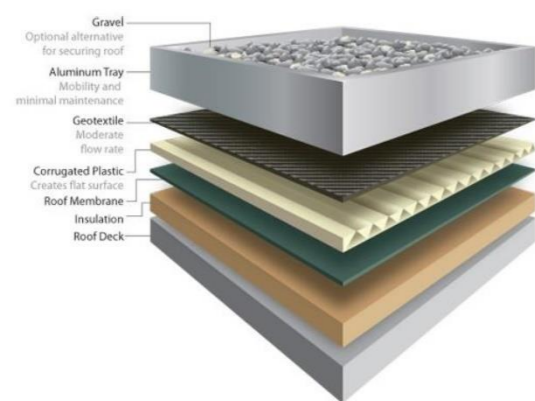
A sustainable drainage strategy has been developed for the site in line with industry standards for below ground surface water drainage design parameters:

- There will be no surcharging of the drainage system for a 1 in 2-year storm;
- The drainage can be surcharged with no flooding for a 1 in 30-year storm; and
- The drainage can flood on-site for a 1 in a 100-year storm with a 40% climate change allowance provided the flood water remains on site and does not flood habitable areas or affect safe ingress and egress to the site for occupiers.

6.5.1 Application Response

Proposed Measures
The strategy follows the SuDS hierarchy for preferred discharge locations for surface water runoff: <ol style="list-style-type: none"> 1. Infiltration into the ground (not feasible) 2. To an adjacent watercourse (not feasible) 3. A surface water sewer if other forms of outlet are not suitable (this option is adopted).
The Vine Lane building and West Central Street component will be positively drained via a network of green and blue roofs.

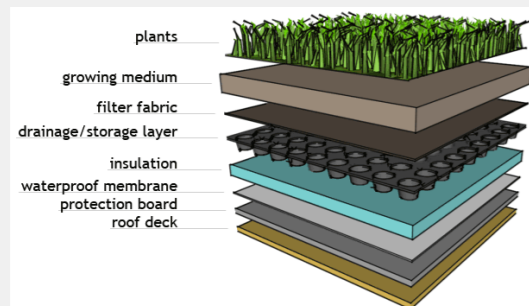
A blue roof comprises a multi-layered system that covers the roof of a building or podium structures with a deep layer of attenuation along with various layers of insulation, waterproofing, and roofing material. These systems are designed to intercept and retain precipitation, increasing the time of concentration and reducing the volume of runoff and attenuation peak flows.



Two blue roof attenuation tanks are proposed for both buildings/sites that will be designed to be self-attenuating and will be designed to drain independently of the rest of the building.

Green roofs are proposed across the site as far as practicable and where feasible.

A green roof comprises a multi-layered system that covers the roof of a building or podium structure with vegetation cover/landscaping over a drainage layer. These systems are designed to intercept and retain precipitation, increasing the time of concentration and reducing the volume of runoff, and attenuating peak flows. Green roofs can be anything from a thin growing layer of sedums and mosses to grass, plants, shrubs, and large trees.



These roofs vary in specification and can be designed to attract bird and invertebrate species. Green and brown roofs can also participate in attenuating rainwater and increasing the time of concentration. This may reduce the requirement for below ground storage attenuation on the site.

Below ground cellular attenuation takes will attenuate surface water at source before discharging at a reduced rate into the Thames Water public sewers, reducing the risk of downstream surface water flooding in the local area.

Residential dwellings on Vine Lane, West Central Street and High Holborn are located above ground level.

6.6 Resilient Foundations and Structures

Ground conditions can be affected by both periods of drought and excess water conditions. Soils that contain clay minerals, such as London Clay, lose water as they dry (making them shrink) and absorb water when wet (making them swell). This shrink-swell behaviour is controlled by seasonal changes in the soil moisture content related to rainfall and local drainage.

Damage to the building facades and roof area from extreme heat and storms could have implications for structural stability. Over time the protection offered by facade and roof materials could deteriorate and lead to heat loss and water infiltration, as well as safety issues, and the need for new materials for repairs.

6.6.1 Application Response

Proposed Measures

Subterranean construction, including piling, will take into consideration the potential effects on ground conditions following periods of drought or excess precipitation i.e. shrink-swell behaviour.

Surface water runoff and drainage will suitably managed to avoid subterranean structural risks caused by shrink-swell.

Main structural elements, such as structural frame, will be designed to withstand intensive storms and extreme heat conditions.

Building envelopes will comprise materials and components that can withstand extreme heat events and storm conditions thereby preventing as far as practicable weathering and structural damage.

7 Urban Greening and Biodiversity

7.1 Key Issues

The site is set in an ecologically impoverished part of London. An Ecological Appraisal and Biodiversity Statement has been produced by Biodiversity by Design.

Urban greening is the measure that provides arguably the greatest opportunity for multiple environmental and social benefits, which are highlighted throughout every chapter of this document. Planting of new trees, shrubs and plants will provide multiple environmental and social benefits including:

- Improved air quality
- Surface water attenuation to help alleviate localised pluvial flood risk
- Improved microclimate (i.e. urban cooling) through trans-evaporation and shading
- Nesting, sheltering, foraging opportunities resulting in biodiversity gain
- Areas for relaxation and restoration
- Sense of wellness through connectivity to nature

By maximising the quantum of urban greening across a site, the proposed development has the ability to subsequently increase its overall sustainability performance.

The importance of urban greening is reflected in both Camden and GLA documentation.

Camden Borough Council have declared not only a Climate Emergency but an Ecological Emergency also. Their 5-year Climate Action Plan includes a requirement whereby “public spaces will encourage and enable healthy and sustainable travel choices and promote biodiversity”.

The London Plan 2021 sets a target 0.3 Urban Greening Factor (UGF) for commercial-led developments, based on a calculation methodology that apportions a specific value to different types of vegetation and green infrastructure.

Although the space available is limited, the opportunity has been taken at all scales to improve the natural environment from ground flora beneath the street trees to habitats at different levels on the buildings. Indeed, the proximity of the Site to the Natural History Museum has inspired the proposed creation of analogues some of the world’s most valued habitats at different elevational levels on the proposed and refurbished buildings

The existing site has an UGF of 0.16; the Applicant has increased this to 0.3 (based on the red line site boundary) through a wide range of urban greening measures proposed through the soft landscaping strategy which achieves the ideal target score (0.3) for commercial developments in London.

Based on Natural England’s Biodiversity Net Gain Version 3.1 calculator, the expected net gain

in habitat units would be 81 % without breach of trading rules. Whilst this is a substantial net gain it should be noted that it does not account for the particularly biodiverse nature of the intensive green roof proposals, nor the proposed provision of artificial wildlife refuges.

7.2 Application Response

Proposed Measures
Open up the site to enable a new multi-zoned public realm to be created with a range of landscape types and zones.
Retain trees where feasible to do, particularly the most healthy, prominent London Planes. It is proposed to remove unhealthy, stunted, or damaged trees. The strategy includes installation of biodiverse ground floral beds under trees at ground level, inclusion of localized climber-based green walls and the installation of artificial refuges for birds and invertebrates. This should enhance the health and ecological value of four of the six trees to be retained.
Strategy for tree planting. Some eight trees in relatively poor condition will be replaced by 10 semi-mature standards (9 London Planes and 1 Honey Locust <i>Gleditsia triacanthos</i> – all species suitable for the location and suitable resilient to predicted climate change). There would, therefore, be a net gain of two street trees in this highly constrained site and a diversification of the age structure of the tree group on site. 4no. new small trees have also been added to the West Central Street first floor courtyard.
Provisional planting palette lists designed in a collaboration between the project landscape architect and project ecologist number some 170 species. Of these 78% are assessed as being of relatively reliably recorded value to native British fauna.
Green / biodiverse roofs proposed to available roof space across the site. These will provide the additional benefits of surface water attenuation and cooling of the local microclimate.
The following measures to limit unnecessary artificial night lighting are to be implemented for species protection: <ul style="list-style-type: none"> • Lighting on the roof terraces is to have minimal safety levels, with other lighting being controlled by movement sensors, and hence not functional when the terrace is not in use by people. • Up-lighting of trees and green walls in the Public Realm will be limited to pockets of light in the low planting around seating areas. • Lighting will be universally LEDs to minimise adverse effects on bat behaviour (no emissions in the UV). • All luminaires will be strongly down-cowled.
Positive draining to trees: Enhanced treeline to be situated in planting beds and runoff from Museum Street is to drain to the tree pits.

Other enhancements could be considered later in the planning process.

Biodiverse green facades provide ecosystem services by cooling the internal environment reducing energy consumption and providing a comfortable internal environment.

Multiple green facades are proposed in the proposed development at several building levels, all increasing the urban greening factor.



Figure 7.1 Proposed development concept axonometric view - from the northwest

Public realm	Factor	Surface	
Existing trees	0.8	616	492.8
New trees	0.8	155	124
Planting bed (Vine Lane + Museum street)	0.7	162	113.4
Climbers (Vine Lane)	0.6	25.8	15.48
1MS			
Terrace level 11	0.8	108.5	86.8
Terrace level 8	0.8	62.7	50.16
Trees	0.6	72	43.2
Green roof	0.7	210	147
WCS			
Trees	0.6	40.5	24.3
Courtyard	0.8	74	59.2
Green roof	0.7	104	72.8
Climbers	0.6	87	52.2
VLB			
Terrace level 1	0.8	61.9	49.52
Terrace level 4	0.8	53.5	42.8
Climbers (level 1)	0.6	128	76.8
Climbers (level 4)	0.6	21.5	12.9
Green roof (level 5)	0.7	128	89.6
High Holborn			
Green roof	0.7	31	21.7
Site area		5300	
TOTAL UGF			0.30

Figure 7.1 – Calculation Matrix for the Urban Greening Factor (UGF)

8 Materials and Waste

8.1 Key Issues

The site provides an opportunity to redevelop or refurbish an important brownfield site within a highly accessible area. An extensive study was undertaken at the outset of the project into the opportunity of reuse of the existing buildings and structures, including both Museum Street and the West Central Street component.

The Applicant is keen to redevelop the site to deliver a development that helps the Council achieve their key sustainability aspirations and commitments; these being:

- Declaration of both a climate and ecological emergency
- A Net Zero Carbon Borough by 2030
- 5-year Climate Action Plan
- Car-free developments towards a car-free Borough

The Applicant is seeking to replace the Travelodge building and the NCP car park with a sustainable, low carbon, and fit for purpose development incorporating new residential apartments, and commercial office accommodation and flexible ground floor town centre floorspace in line with LB Camden policies contributing to employment growth within the area. The basement will be retained for use as plant space, cycle store and a loading bay. The strategy for West Central Street component involves a mix of retention and refurbishment with part demolition of listed elements and new build.

Waste would be generated by the proposed development at two stages. Firstly, the demolition and construction phases of the scheme has the potential to generate a large volume of waste. Secondly, occupants, users and visitors to the completed site would also generate waste as phases become operational.

8.2 Circular Economy

The current industry and policy emphasis is a shift from the ‘linear’ waste economy (essentially raw materials are manufactured for a single use item before being discarded at the end of its life) to a more ‘circular’ economy, with the ultimate goal being Net Zero Waste.



A Circular Economy Statement (CES) has been prepared for the proposed development. A summary is provided below; refer to the CES submitted as part of the application for full details.

8.2.1 Circular Economy Principles for the Existing Site - Demolition & Refurbishment

In line with the Waste Hierarchy, first the condition of the existing site must be considered for any opportunities for a refurbishment in order to prevent waste prior to a new building being developed. This approach was considered at the onset of the scheme with feasibility studies undertaken by the architectural and structural design teams.

Following detailed consideration, a refurbishment-led approach was deemed to provide unsatisfactory spatial qualities and building performance. A explanation of this is set out in the Design and Access Statement submitted with this planning application. It should be noted that a full and detailed appraisal and analysis of various retention options has been carried out to compare the performance against the proposed development, for further details, see the Retention Report. This considers embodied carbon impact and demolition waste with regards to a circular economy, but also many other sustainability (environmental and social) considerations. The report will be submitted with the application.

A draft pre-demolition audit has been undertaken by Arup and draft pre-reclamation audits have been carried out by HTS. Through the next iteration of pre-demolition audit process, a review will be undertaken to identify potential fixtures, fittings, and equipment with enough value for reuse. This may include items or materials with basic reuse value or architectural value.

This audit is proposed to be undertaken by the demolition contractor to maximise the recovery of materials from demolition for subsequent high-grade applications.

Non-hazardous demolition waste will be diverted from landfill through reuse, recycling, and recovery. Actions to avoid waste being disposed of in landfill include:

- Reusing the material on site (in situ or for new applications)
- Reusing the material on other sites
- Community reuse and recycling
- Salvaging or reclaiming the material for reuse
- Returning material to the supplier via a ‘take-back’ schemes
- Direct recycling of materials via a specialist material reprocessor or recycler
- Recovery of the material from site by an approved waste management contractor and recycled or sent for energy recovery
- Utilising waste in exempt or permitted applications (not landfill).

8.2.2 Circular Economy Approach for the Proposed Development

Minimise Material Waste

Material waste is to be minimised on the site through efficient design and minimising construction waste in line with the BREEAM credit Wst01 – Construction Resource Efficiency and Mat06 – Material Efficiency.

Material Efficiency

In line with the BREEAM credit Mat 06 - Material Efficiency, at the end of each RIBA stage the project team must convene to examine opportunities to implement appropriate measures to ensure that the amount of materials used in the construction of the development are optimised and therefore reduce the amount of construction waste arising from site.

The development philosophy is to work with as much of the existing structure as possible to minimise the amount of demolition and new structure required. As such, the existing structure and façade of 35, 37, 39 and 41 New Oxford Street shall be retained as far as practically possible.

In line with the BS 8895 Designing for material efficiency in building projects, the project team will identify opportunities to improve materials efficiency by:

- Reducing the quantity of materials used, where this does not adversely impact on other aspects of resource efficiency, such as improving energy efficiency.
- Reducing the quantity of materials wasted during the construction process by designing out waste and planning for effective project waste management wherever possible.
- Designing for effective project waste management, which includes reducing, reusing, recycling and recovering waste material as appropriate; and
- Using more recycled materials and mainstream products containing higher levels of recycled material including material not necessarily sourced from construction and demolition waste, for example, mineral extraction or post-consumer waste.

Steel and concrete procured for the Development will go beyond the GLA target of 20% recycled content. The contractor will be responsible for implementing this goal in practice.

Minimise Construction Waste

All non-residential buildings to not exceed target $\leq 7.5 \text{ m}^3$ or ≤ 6.5 tonnes per 100 m^2 Gross internal floor area. Residential buildings have targets for non-hazardous construction waste not to exceed to 26.52 m^3 or 16.90 tonnes per £100K of project value.

The Principal Contractor will be required to ensure construction waste is minimised as far as possible. Some measures which could be adopted to reduce construction waste generated on site include:

- Setting and reporting against waste reduction targets in Site Waste Management Plan.
- Include waste minimisation initiatives and targets in tenders or contracts, and engagement with the supply chain.
- Just in time delivery of materials to prevent spoilage.
- Recording material delivered onsite and dispatched.

Design for Adaptability and Disassembly

A Design for Disassembly and Functional Adaptability study has been undertaken for the site to identify opportunities for accommodating future changes of use to the building over its lifespan, and how they could be incorporated into the Stage 2 design proposals.

The aim of the Design for Disassembly and Functional Adaptability study is to identify ways to reduce waste and cost associated with future refurbishment or fit-out works and ultimately in demolition, to improve the lifetime value of the materials and reduce costs and disruption associated with the need for future adaptation, demolition and strip-out, thereby reducing the associated waste and costs. The study has been designed to comply with BREEAM credit issue Wst 06.

The 1MS structure is adaptable as it has been designed for retail use on the lower floors and office use on the upper floors. Both of these uses would allow for the building to be converted to residential use in the future.

Sustainable Procurement of Materials

A sustainable procurement plan has been developed which sets out a clear framework for the responsible sourcing of construction products to guide procurement throughout the project and by all involved in the specification and procurement of construction products.

The main contractor will be encouraged to prioritise the use of suppliers with a current accredited environmental management system (EMS) in place over those suppliers that do not.

Timber is to be responsibly sourced in accordance with the UK Government’s Timber Procurement Policy. i.e. FSC or PEFC only. Timber, which is locally reclaimed, including during construction should be used.

Products with an Environmental Product Declaration (EPD) should be specified where possible. EPDs provide information about products from cradle to grave (or cradle) such that designers, specifiers, buyers, code officials and the general public can better understand a product's specific, as well as overall, environmental impact. EPDs make the environmental benefits of energy efficiency and other important aspects of a given product clearer. This should be reviewed during the detailed design.

Circular Economy Approach for Municipal Waste During Operation

Facilities management operatives will transfer waste to dedicated collection points agreed with the Council on a daily basis. Please refer to the Design and Access statement for more information.

Achieving the London Plan target of 65% of municipal waste to be reused, recycled or composted by 2030 will be promoted by the provision of a suitably sized, dedicated, and labelled space for storing/segregating recyclable waste within the scheme. These will be provided centrally and locally and will be in accordance with the London Plan and Local Authority requirements.

The use of smart waste minimisation schemes has been discussed with the design team. Exploration of the schemes, Globe Chain and Community Wood have been considered for the Development. Current exploration suggests Globe Chain is most appropriate for operational waste minimisation on this scheme.

Further consideration at later design stages is required regarding the available space and appropriate management for use of schemes such as Globe Chain. Future exploration will consider partnerships for management of the scheme offsite, to overcome the potential issue of space.

To consolidate waste collections into as few vehicles as possible, commercial tenants will be required to use waste contractors appointed by the site FM team for the collection of refuse, recycling and food waste streams.

Where recyclable waste is to be collected as a co-mingled stream for the residential development, the following individual streams will be accommodated by this collection:

- Card,
- Paper,
- Mixed plastics,
- Metals,
- Glass.

9 Local Impacts

9.1 Local Communities

A socio-economic assessment has been carried out to identify the potential economic impacts that could be generated by the proposed development. It is expected that the proposed development will deliver a number of wider benefits for the local area, including meeting local housing and employment needs.

In summary, the benefits of the proposed development are wide ranging and will make a meaningful contribution to achieving the economic objectives in place locally and regionally. A summary of these benefits is illustrated opposite. Refer to the Socio-Economic Assessment for full details.

9.2 Local Pollution

It is the intention of the team to minimise as far as practicable the impact of the proposed development on the local environment. This will be achieved through the implementation of measures to control pollution and to avoid a negative impact on local environmental indicators, as far as practicable.

Key issues for the site include:

- Noise – a noise impact assessment has been carried out; the results have informed the design proposals.
- Air quality – an air quality assessment (including air quality neutral assessment) has been carried out; the results demonstrate that the proposed development does not exceed the benchmarks for building or transport emissions.
- Disturbance from light (night time)

A summary of proposed mitigation measures is provided in section 8.3

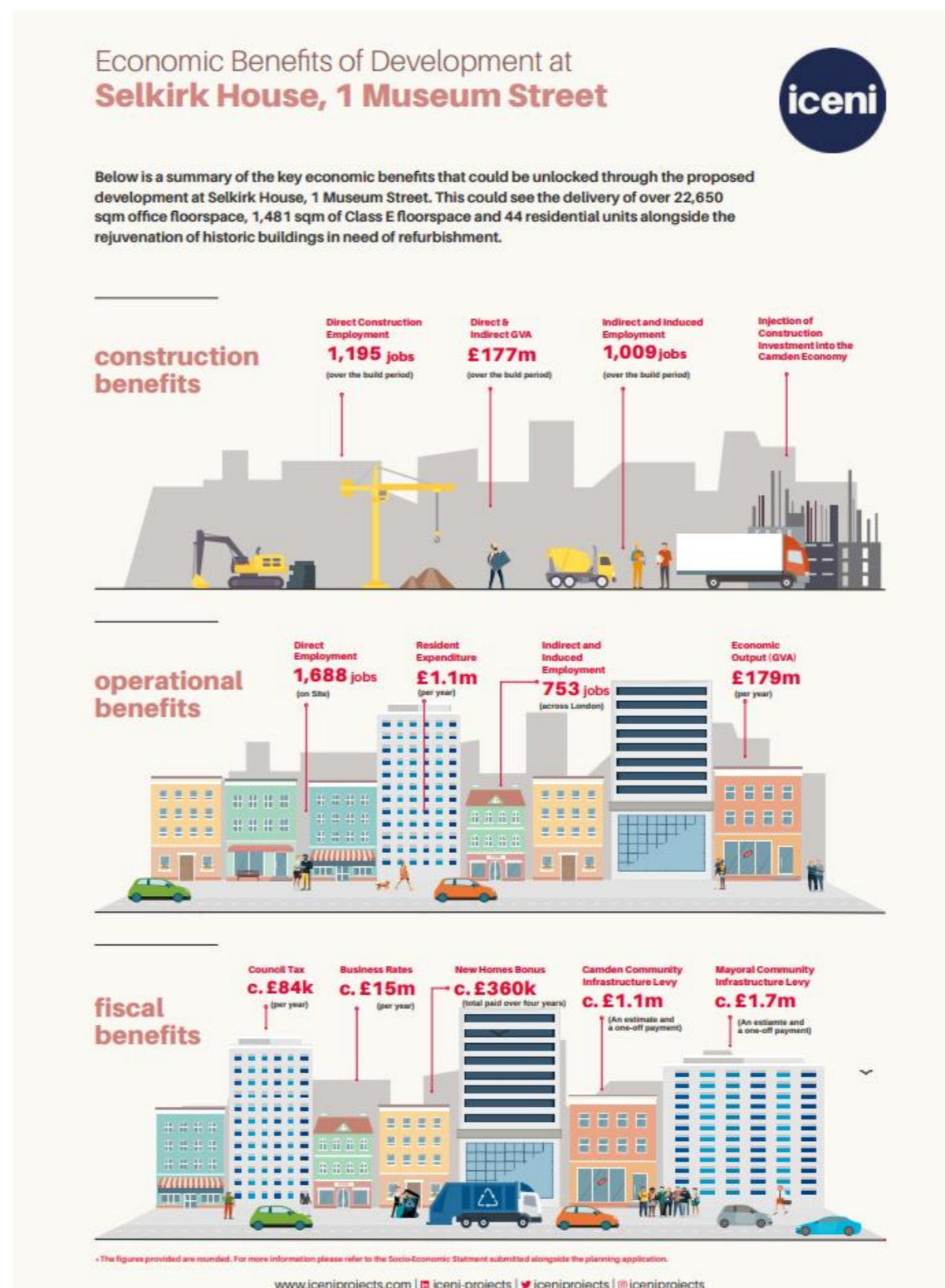


Figure 9.1 – Summary of the expected local and regional economic benefits

9.3 Application Response

Proposed Measures

Sound-masking:

- New buildings provide a partial buffer to local road noise
- MEP plant located either below ground or at roof level (within sound attenuated compounds)

Soundscape through ‘quiet’ areas are proposed as part of the landscaping strategy for the public realm.

Building facades have been designed to limit noise ingress in line with limits set by the Council.

External noise-generating building services plant will sit within acoustically treated enclosures to ensure noise egress is limited to within the thresholds set by the Council.

Air quality impact reduced through no onsite combustion of fossil fuels for heating (electric systems only i.e. heat pumps. Diesel required for generator – intermittent use only.

Air quality impact reduced through the proposed development being car-free and the promotion of walking and cycling (refer to chapter 9 Sustainable Travel)

Air quality impact reduced through a managed approach to vehicles that service the site.

Air quality impact reduced and managed through extensive urban greening and green infrastructure

Hold regular liaison meetings with other high risk construction sites within 500 m of the site boundary, to ensure plans are co-ordinated and dust and particulate matter emissions are minimised.

Dust Management Plan will be implemented to monitor dust deposition, dust flux and PM10 monitoring

External lighting designed to minimise night-time light pollution:

- avoidance of misdirected lighting and uplighting in open areas
- lighting curfew hours where non-essential lighting is dimmed or switched off (via automated controls)

10 Sustainable Travel

10.1 Key Issues

Despite measures to make vehicular transport cleaner and greener, there are still several social and environmental impacts linked to the use of private motor vehicles and also public transport. Air quality remains a key issue in central London, as does noise, and safety for pedestrians and other road users.

Camden’s 5-year Climate Action Plan includes a requirement whereby “public spaces will encourage and enable healthy and sustainable travel choices and promote biodiversity”.

10.2 Site Travel Context

The site’s Central London location means that it is well served by most essential amenities, including retail, green spaces and schools. The streets surrounding the site benefit from wide footways, and several pedestrian crossings with dropped kerbs and tactile paving are available in close proximity to the site.

According to TfL’s WebCAT website, the site has a Public Transport Accessibility Level (PTAL) of 6b, which indicates ‘excellent’ connectivity to the surrounding network and is the highest possible score on the PTAL scale. Three London Underground stations are located within a short walking distance of the site, and over 400 buses an hour in peak hours are also available. Elizabeth line services (‘Crossrail’) also operates in the area. Step-free access is available at one of the nearby London Underground stations.

10.3 Application Response

Proposed Measures
The proposed development will be car free.
The proposals include a new north-south pedestrian-only route (‘Vine Lane’) through the site as a continuation of West Central Street. This will help improve the connectivity of the area by creating a new route between New Oxford Street and High Holborn.
Access routes through the site and to building entrances will be designed to encourage pedestrian use: <ul style="list-style-type: none"> ▪ Safe and well lit ▪ Good wayfinding (signposts, etc) ▪ Inclusive and accessible

The removal of the NCP car park will reduce vehicular movements in the area and the servicing proposals keep the majority of traffic away from West Central Street thereby allowing greater pedestrian and cyclist priority on the street.
Cycle parking will be provided for residential residents, and for staff for the Museum Street and Vine Lane office buildings and the town centre uses. Visitor/customer cycle parking is also proposed. 494 cycle parking spaces are to be allocated as follows: <ul style="list-style-type: none"> ▪ 345 long stay cycle parking spaces allocated to the office component. ▪ 11 long stay cycle parking spaces allocated to the flexible town centre uses floorspace component. ▪ 73 long stay cycle parking spaces allocated to the residential component. ▪ 65 cycle parking spaces allocated to visitors to the site and located within the public realm areas.
Ease of access to cycle storage. Cyclists will be able to access the long-stay office cycle parking via an entrance on West Central Street. Residential cycle parking will be directly accessible from residential lobbies on West Central Street, Vine Lane, Museum Street and New Oxford Street.
Cyclist facilities will be provided to encourage the use of cycles: <ul style="list-style-type: none"> ▪ Showers ▪ Lockers ▪ Charging for electric bikes
A Framework Travel Plan (TP) has been prepared for the site with objectives and targets for: <ul style="list-style-type: none"> ▪ Encouraging travel by walking and cycling; ▪ Encouraging use of public transport as an alternative to car trips; ▪ Minimising single occupancy private motor vehicle trips; and ▪ Facilitating the opportunity to achieve a healthy lifestyle for all those using the site.
The TP includes office initiatives such as: <ul style="list-style-type: none"> ▪ Notice boards in prominent locations ▪ Website and staff induction ▪ Flexible workplace practices ▪ Measures to facilitate walking, cycling and the use of public transport
The TP includes residential initiatives such as: <ul style="list-style-type: none"> ▪ Notice boards and website ▪ Welcome pack ▪ Promotion of health and environmental benefits of active travel ▪ Measures to facilitate cycling (information, safety training, cycle maintenance)

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