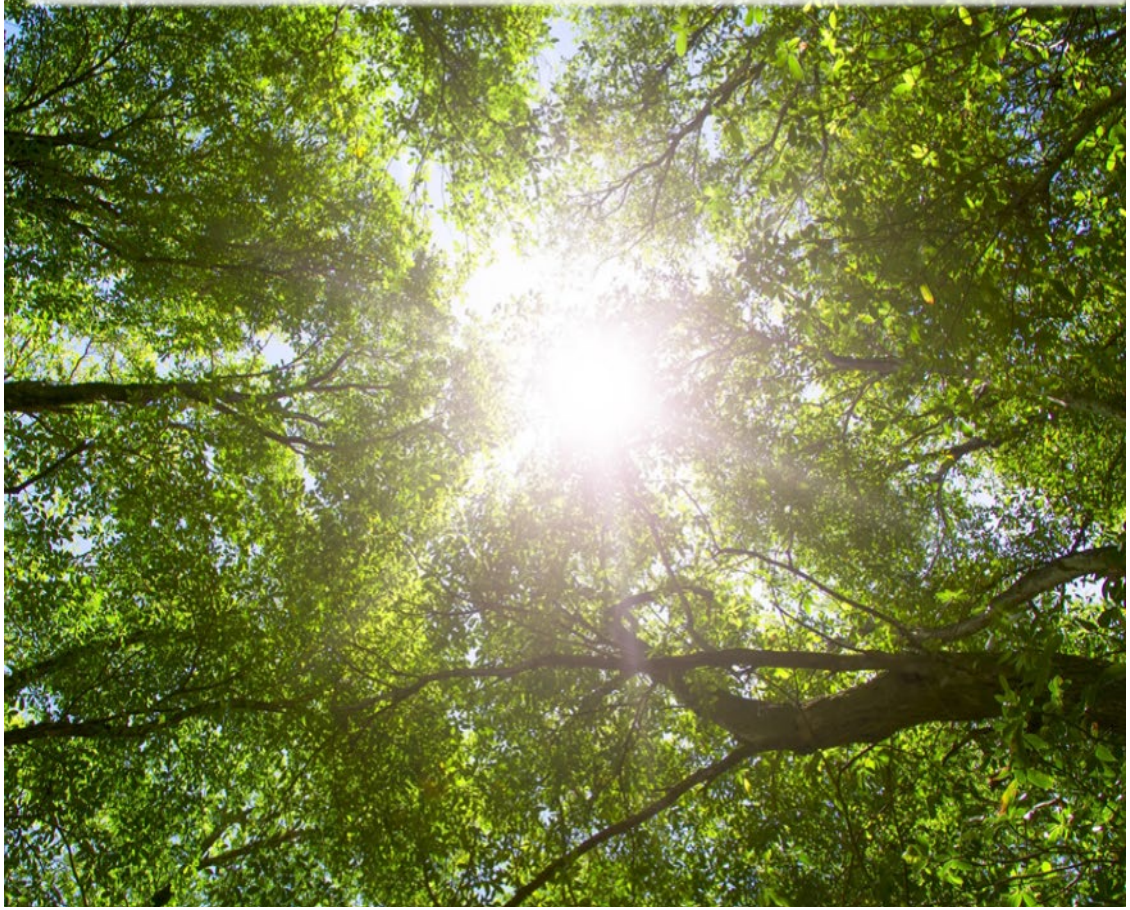
Heath House, Camden

Sustainability Statement

Ensphere Group Ltd on behalf of
Aria Construction Management Limited



Ensphere Group Ltd
55A Catherine Place,
London, SW1E 6DY
+44 (0) 20 7846 9040
www.enspheregroup.com

ensphere

ensphere

Heath House, Camden

Sustainability Statement

Client Name: Aria Construction Management Limited

Document Reference: 23-E085-002

Project Number: 22-E085

Quality Assurance Approval Status

This document has been prepared and checked in accordance with Ensphere Group Ltd's Quality Management System.

Issue:	Version:	Prepared by:	Reviewed by:	Date:
Final	V2	Danielle Cawley	Pete Jeavons	August 2023

ensphere

Contents

1. Executive Summary 1

2. Introduction 2

3. Assessment Methodology 4

4. Planning Context 6

5. Site Context 12

6. Sustainable Design Proposals 15

7. Sustainable Construction Proposals 18

8. Summary 20

Appendices 21

A. Site Plans 22

B. Key Local Planning Policy Requirements 24

C. General Notes 29

1. Executive Summary

1.1 This Sustainability Statement presents the sustainability credentials for a proposed development at Heath House, Camden.

1.2 The proposals are for the refurbishment and extension (including basement) on Heath House (a Grade II* Listed building).

1.3 A range of sustainable design features are proposed, and construction will be responsibly managed to ensure minimal impact on the environment and local community.

1.4 Given the nature of the development proposal, the physical alterations are limited. Nevertheless, it is proposed to reduce energy demands in line with the Energy Hierarchy. This will be achieved principally through the incorporation of insulation to any refurbished or additional walls, high performance glazing, as well as more efficient lighting and control measures.

1.5 Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the National Planning Policy Framework, London Plan and policies of the Council. When implemented, the scheme will provide a more efficient and sustainable development.

2. Introduction

2.1 Ensphere Group Ltd was commissioned by Aria Construction Management Limited to produce a Sustainability Statement for the proposed redevelopment of Heath House, London, NW3 7ET.

Site and Surroundings

2.2 The site comprises Heath House, a Grade II* Listed residential building on the west of Hampstead Heath and is within the Hampstead Conservation Area.

2.3 The site is bounded by the garden of a large residential property – Heath Park – to the north, by North End Way to the west and by Spaniards Road to the east. To the south is Hampstead War Memorial, which sits on the edge of the roundabout connecting North End Way and Spaniards Road.

2.4 The surrounding area is characterised by the greenery of Hampstead Heath and large residential homes.

Planning Context

2.5 The site was the subject of planning permission for the following development in 2009:

Demolition of garage block and erection of new west side wing comprising basement, lower ground, ground and 1st floors including double garage; erection of rear ground floor conservatory extension; remodelling of roofs of main house and east side wing; various external alterations; and associated landscaping including new walled courtyard to rear of garage wing. (LPA Ref: 2008/0661/P).

2.6 This development was implemented and saved in January 2012, via demolition works.

2.7 In 2012, the consent was amended via a Section 96a application (LPA Ref: 2012/5432/P), solely to introduce the now standard 'approved drawings' condition to facilitate a future Section 73 (Minor Material Amendment) application.

2.8 In 2018, a further Section 96a application, LPA Ref: 2017/4294/P, was approved. The application related to a number of proposed internal and external alterations, most notably the removal of the originally proposed basement level, which had included a swimming pool.

2.9 In 2021, a Section 73 application, LPA Ref: 2018/4786/P, was also approved. This application replaced the EcoHomes report that had originally been provided in support of the application with a BREEAM report to reflect changing energy standards.

Proposed Development

2.10 The Applicant wishes to take forward the original 2008 scheme with the proposed basement level and swimming pool that formed part of the original application (which has been implemented), while retaining all other amendments made since then (including a condition requiring the submission of BREEAM report). Most of these elements have been approved at some stage by the Council and the present application would seek to unify them under single consent, with some minor changes.

Report Objective

2.11 The objective of the Sustainability Statement is to outline how sustainability and the principles of sustainable development have been incorporated into the development proposals.

3. Assessment Methodology

Sustainability & Sustainable Development

3.1 "Sustainability" is a broad concept generally used to describe the ability to perpetuate a particular state of being. It is widely used in the context of development and where there is potential for changing circumstances to cause an impediment to the perpetuation of a phenomenon.

3.2 The term is subjective and the understanding of the concept is influenced by perceptions and aspirations. "Sustainability" is therefore variably defined but normally encapsulates a wide range of issues, often characterised by their relationship with the economy, society and the environment (the "three pillars" of sustainability).

3.3 These issues are not necessarily mutually exclusive and whilst they are often presented as such, technically, the economy is a function of society; and society concerns the interrelationships and behaviours of one species within the wider environment. Nevertheless, the identification and characterisation of these issues enables a better understanding of the things that matter in decision making, which enable a balance to be struck when priorities compete.

3.4 The term "sustainable development" is often used interchangeable with "sustainability" but it is narrower in scope and seeks to promote the perpetuation of human advancement. The "Brundtland Report" (officially titled "Our Common Future" and written by the United Nations World Commission on Environment and Development, Chaired by Gro Harlem Brundtland in 1987), presents perhaps the most widely cited and understood interpretation of this concept:

> *"Sustainable development is development that meets the needs of the present without compromising the ability of future generations to meet their own needs"*

3.5 The definition introduces the concept of "needs" and the generational timeframe for evaluating whether an action is sustainable or otherwise.

Analysis Methodology

3.6 Given the broad definitions associated with the terminology of "sustainability" and "sustainable development", understanding how these concepts have been interpreted and incorporated into the local planning regime requires a review of the planning policy as well as the documents upon which the policy is based. The report therefore commences with an overview of the sustainable communities' strategy, planning policy and other considerations.

3.7 An appraisal of the sustainability credentials of the scheme then follows. Structure is important when assessing sustainability due to the breadth of issues being considered; an approach has been created based upon the phases of the development cycle relevant to the planning decision making processes, with consideration given to the "three pillars" (discussed above) and requirements of policy.

Assessment Matrix

	Economic	Social	Environmental
Strategic	✓	✓	✓
Design	✓	✓	✓
Construction	✓	✓	✓

3.8 It is recognised that the scale and nature of the scheme will affect the relative importance of the matrix dimensions and entries. For example, a single residential unit is unlikely to be viewed as having a major societal impact on the basis of its scale relative to its context. However, the societal implications of an urban extension may be much more significant.

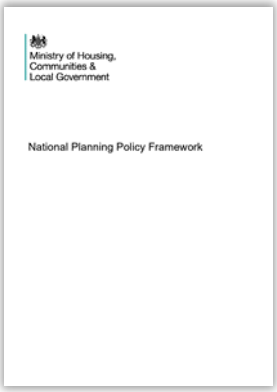
3.9 The emphasis is therefore case specific, and the assessment sections of this report seek to highlight the relevant factors in a suitably balanced manner.

4. Planning Context

4.1 Local planning policy relevant to sustainable development is considered below:

National Context

National Planning Policy Framework (2021)



4.2 The National Planning Policy Framework (NPPF) was updated in July 2021. Paragraphs 7, 8 and 10 of the revised NPPF include reference to the following:

7. "The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. At a similarly high level, members of the United Nations – including the United Kingdom – have agreed to pursue the 17 Global Goals for Sustainable Development in the period to 2030. These address social progress, economic well-being and environmental protection".

8. "Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives):

- *An economic objective - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;*
- *A social objective - to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and*
- *An environmental objective - an environmental objective – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy."*

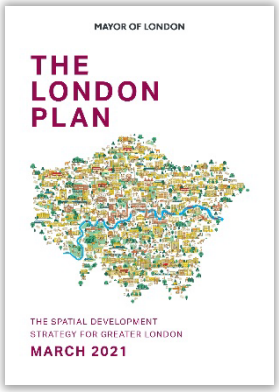
10. "So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development"

Planning Practice Guidance (2016; updated 2021)

- Climate Change - Advises how planning can identify suitable mitigation and adaption measures in plan-making and the application process to address the potential for climate change.
- Design - Design affects how people interact with places and can affect a range of economic, social and environmental objectives. The guidance states that planning policies and decisions should seek to ensure that the physical environment supports these objectives.
- Natural Environment - Explains key issues in implementing policy to protect biodiversity, including local requirements.
- Environmental Impact Assessment – Explains requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. This allows local planning authorities to better consider the environmental effects of a project when granting planning permission.
- Renewable and Low Carbon Energy - Guidance to help local councils in developing policies for renewable and low carbon energy and identifies the planning considerations.
- Flood Risk and Coastal Change - Advises how to take account of and address the risks associated with flooding and coastal change in the planning process.

London Context

London Plan (2021)



4.3 The London Plan is the overall strategic plan for London, it sets out an integrated economic, environmental, transport and social framework for development of London over the next 20-25 years. The London Plan is part of the Development Plan and covers a range of planning issues. The presented policies provide a vision for how London should sustainably grow and develop in the future. Policies considered pertinent to this report are presented below:

- Policy D2 (*Infrastructure requirements for sustainable densities*) – development proposals should be considerate of future planned levels of infrastructure and proportionate to the site's connectivity.
- Policy D3 *(Optimising site capacity through the design-led approach)* - lists a series of requirements including a requirement for development to aim for high sustainability standards.

- Policy G1 *(Green Infrastructure)* - Development proposals should incorporate appropriate elements of green infrastructure that are integrated into London's wider green infrastructure network.

- Policy G4 *(Open Space)* - Development proposals should not result in the loss of protected open space; and where possible create areas of publicly accessible open space.

- Policy G5 *(Urban Greening)* - Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design.

- Policy G6 *(Biodiversity and access to nature)* - Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain.

- Policy SI 1 *(Improving air quality)* – Development proposals should not lead to further deterioration of existing poor air quality.

- Policy SI 2 *(Minimising greenhouse gas emissions)* - Major development should be net zero-carbon and minimise emissions in accordance with the following energy hierarchy: be lean, be clean, be green, be seen. A minimum on site reduction of 35% beyond Building Regulations will be required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Any short fall with the zero-carbon target should be addressed through a carbon offset payment. Development referable to the GLA should also calculate whole life-cycle carbon emissions.

- Policy SI 3 *(Energy infrastructure)* - Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system.

- Policy SI 4 *(Managing heat risk)* - Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems.

- Policy SI 5 *(Water infrastructure)* – Development proposals should be achieving mains water consumption of 105 litres or less per head per day; and achieve at least the BREEAM excellent standard for the 'Wat 01' water category. Smart metering, water saving, and recycling measures should also be incorporated.

- Policy SI 7 (*Reducing waste and supporting the circular economy)* - Referable applications should promote circular economy outcomes and aim to be net zero-waste.

- Policy SI 12 *(Flood risk management)* - Development proposals should ensure that flood risk is minimised and mitigated.

- Policy SI 13 *(Sustainable drainage)* - Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Sustainable Design and Construction Supplementary Planning Guidance (2014)

4.4 This SPG aims to support developers, local planning authorities and neighbourhoods to achieve sustainable development. It provides guidance on to how to achieve the London Plan objectives effectively, supporting the Mayor's aims for growth, including the delivery of housing and infrastructure.

4.5 The guidance in this SPG is intended to:

- provide detail on how to implement the sustainable design and construction and wider environmental sustainability policies in the London Plan.
- provide guidance on how to develop more detailed local policies on sustainable design and construction.
- provide best practice guidance on how to meet the sustainability targets set out in the London Plan; and
- provide examples of how to implement sustainability measures within developments.

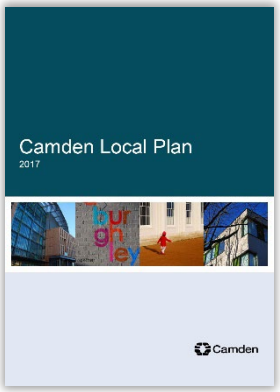
Energy Assessment Guidance (2022)

4.6 This guidance document explains how to prepare an energy assessment to accompany strategic planning applications referred to the Mayor as set out in London Plan Policy SI 2. It states that the purpose of an energy assessment is to demonstrate that the proposed climate change mitigation measures comply with London Plan energy policies, including the energy hierarchy.

4.7 Although primarily aimed at strategic planning applications, London boroughs are encouraged to apply the same structure for energy assessments related to non-referable applications and adapt it for relevant scales of development.

Local Context

Camden Local Plan (July 2017)

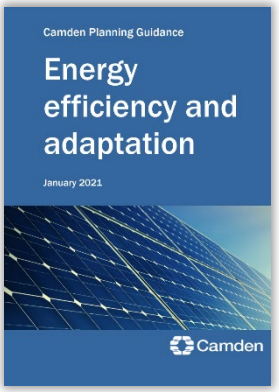


4.8 The Local Plan sets out the planning policies, site allocations and land designations Borough-wide and is the central document in the Borough's Development Plan.

4.9 The following policies are considered relevant to this report:

- Policy G1 (*Delivery and Location of Growth*) – promotes sustainability with regards to the efficient use of land and buildings;
- Policy D1 (*Design*) – includes a requirement for development to be sustainable with regards to design and construction;
- Policy D2 *(Heritage)* – includes conditions regarding the preservation of Camden's heritage assets, including conservation areas and listed buildings
- Policy CC1 (*Climate Change Mitigation*) – promotes zero carbon development, consideration of the Energy Hierarchy (encouraging connection to District Energy Networks), reduced reliance on transport by car and resource efficiency. All new residential development will be required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy). The Council will expect developments of five or more dwellings and/or more than 500 sqm of any gross internal floorspace to achieve a 20% reduction in carbon dioxide emissions from on-site renewable energy generation, unless it can be demonstrated that such provision is not feasible;
- Policy CC2 (*Adapting to Climate Change*) – requires development to seek to protect existing green space, use of SUDS, incorporating biodiverse roofs, consideration of overheating risks, encourages the use of the Home Quality Mark and Passivhaus Standards along with BREEAM "excellent" for non-domestic and refurbishment developments >500sqm and/or five or more dwellings;
- Policy CC3 (*Water and flooding*) - The Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible. Residential developments will be expected to meet the requirement of 110 litres per person per day (including 5 litres for external water use);
- Policy CC4 *(Air quality)* - Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution, with recommended measures adopted. In locations of poor air quality, developments that introduce sensitive receptors (i.e. housing, schools) will also need to be designed to mitigate the impact;
- Policy CC5 *(Waste)* – developments need to include facilities for the storage and collection of waste and recycling, in line with Council waste targets.
- Policy DM1 (*Delivery and Monitoring*) – supports sustainable development;

Camden Planning Guidance – Energy Efficiency & Adaptation (January 2021)



4.10 This document was adopted on 15 January 2021 following statutory consultation and replaces the Energy efficiency and adaptations CPG (March 2019), which replaced the CPG3 Sustainability (July 2015).

4.11 This guidance provides information on key energy and resource issues within the borough and supports Local Plan Policies CC1 Climate change mitigation and CC2 Adapting to climate change.

4.12 Includes requirements concerning credits under certain BREEAM categories (60% energy, 60% water and 40% materials); and reference to a 20% carbon reduction target using renewables.

4.13 Where developments are likely to be at risk of overheating applicants will be required to complete dynamic thermal modelling to demonstrate that any risk to overheating has been mitigated.

4.14 Assessment tools, such as Passivhaus and Home Quality Mark are “encouraged”.

5. Site Context

5.1 In line with the "three pillars" of sustainability discussed within the methodology section, the site context has been considered with regard to its economic, social and environmental context; acknowledging that interrelationships exist between many of these issues.

Socio Economic Context

ONS Household Projections

5.2 The Office for National Statistics presents data relevant to household projections for England, by region and local authority, mid-2001 to mid-2043 (formerly referred to as live tables on household projections).

5.3 The assumptions underlying national household and population projections are based on demographic trends. They are not forecasts as, for example, they do not attempt to predict the impact of future Government policies, changing economic circumstances or other factors that might influence household growth. The projections show the household numbers that would result if the assumptions based in previous demographic trends in the population and rates of household formation were to be realised in practice.

5.4 Nevertheless, data suggests that household numbers in Camden will increase from circa 116,017 in 2022 to around 141,366 by 2043; a ~22% increase over the period.

Output Area Classifications

5.5 Area classifications for Great Britain have been produced after every census since 1971, and as of the 2001 Census, they have been extended to cover the UK as a whole.

5.6 Using socioeconomic and demographic data from each census, the classifications seek to identify areas of the country with similar characteristics. Therefore, the presented information should not be interpreted as an assessment specific to the Application Site and the surrounding area; but rather it is a reflection of the characteristics of areas with a similar socioeconomic and demographic pattern.

5.7 Data from the 2011 Census has been released identifying the site as covering an OAC area with OAC Code E00004407 which is classified as "Urbanites" (Supergroup Code 5), "Ageing Urban Living" (Group Code 5b) and "Communal Retirement" (Subgroup Code 5b2).

5.8 Radial Plots are provided by the Office for National Statistics. Each data point on a radial plot displays the value for each one of the 60 standardised and transformed 2011 Census variables used.

5.9 The data indicates higher than average occupancy of flatted accommodation, as well as detached house/ bungalows. Social renting is notably above the national average, with private

renting below. Overcrowding displays a similar rate to the national average. The proportion of people who commute by walking and bicycle is also higher than average.

Indices of Multiple Deprivation

5.10 The English Indices of Deprivation use 38 separate indicators, organised across seven distinct domains of deprivation. The Indices of Multiple Deprivation data are then constructed by combining the seven transformed domain scores, using the following weights; income (22.5%); employment (22.5%); health and disability (13.5%); education, skills and training (13.5%); barriers to housing and services (9.3%); crime (9.3%); and living environment (9.3%).

5.11 The IMD can be used to rank every Lower Layer Super Output Area in England according to their relative level of deprivation. The data is not a measure of affluence; therefore the area ranked as the least deprived is not necessarily the most affluent.

5.12 The IMD data comprise a numeric value in a scale of 1 to 32,844 (1=most deprived) and are represented in a coloured scale of deciles (1=most deprived – dark red; 10=least deprived – dark blue) in the respective maps. Government data (illustrated below) indicates that the area ranks 29,501 out of 32,844; where 1 is the most deprived. The area is therefore considered to have a far lower than average level of deprivation overall.

5.13 The table below provides the data for the individual domains:

Table 5.1 IMD Domain Scores

Domain	Score
Income Rank	32,705
Employment Rank	32,761
Education, Skills and Training Rank	29,613
Health Deprivation and Disability Rank	32,829
Crime Rank	16,786
Barriers to Housing and Services Rank	25,562
Living Environment Rank	5,528
Rank of IMD Score	**29,501**

Note: Scores out of 32,844, where 1 is the most deprived.

Environmental Context

5.14 The environmental context is assessed in greater detail in the accompanying environmental reports. The following provides an overview of the pertinent matters:

Land Use

5.15 The site is occupied by the existing Grade II* Listed residential building which is being refurbished as part of the proposed plans, meaning that its development will reduce the pressure to develop elsewhere and on greenfield land.

Flooding

5.16 From review of the Environment Agency (EA) Flood Map for Planning, the site is identified as being in a Flood Zone 1 and at low risk of flooding.

Ecology

5.17 The site is covered by hardstanding and existing structures, with some soft landscaping surrounding and to the rear the building. The current ecological value is considered negligible.

Local Amenities & Public Transport

5.18 Many of the social and economic issues concern accessibility, which in its broadest sense is regarded as a combination of access to local shops, services, amenities, employment opportunities; as well as access to public and other transport facilities. Therefore, the accessibility of the proposed scheme to local amenities is a relevant consideration in determining whether the site represents a sustainable location.

5.19 The Site is located just to the north of Heath Street where many shops, restaurants and services are present. Heath House also benefits from excellent connectivity through a network of pedestrian footpaths and is located in close proximity to many public gardens, notably Hampstead Heath. The Site sits across an area with both a PTAL rating of 2 and 3, which indicates a low to average level of access to public transport relative to other London areas. A number of bus stops are located within the site vicinity, as well as Hampstead Underground Station within 0.5 miles. Cycling is also facilitated, and a number of cycle paths are also evident in the locality.

6. Sustainable Design Proposals

6.1 This section presents an overview of the proposed sustainable design features for the scheme.

Energy

6.2 The energy strategy has been created in consideration of the Energy Hierarchy by prioritising fabric first, passive design and landscaping measures to minimise energy demand for heating, lighting and cooling.

Energy Efficiency Measures

6.3 In line with the first principle of the Hierarchy, the design has explored measures to reduce demand as follows:

- It is intended that new window openings are to be installed into the building, and it is anticipated that the glazing system will be highly efficient. This will improve access to natural daylight, whilst preserving heating within the properties on all floors.
- It is intended that the performance of the building fabric installed will incorporate relatively low U-Values to reduce the rate at which the building loses heat, preserving the heat within the space and reducing the requirement for mechanical heating. Improvements to building fabric performance are recognised to be limited given the building status as a Grade II* Listed building.
- Lighting design is intended to be highly efficient and in excess of Building Standards requirements, as well as considerate of appropriate CIBSE guidance. It is intended that lighting efficacy shall be in excess of 100 lumens/circuit Watt (likely LED) for all new fittings.
- Where external lighting is upgraded, the strategy shall be designed to minimise light spillage and nighttime light pollution in line with the ILP's Guidance notes for the reduction of obtrusive light; low illuminance levels, fittings and controls shall be employed accordingly.
- Good internal air quality will be achieved through the creation of a building envelope with a low air permeability; meaning that the building fabric will reduce the infiltration of pollution from the external environment.
- Where appliances such as fridges are provided, it is proposed that the EU energy label of these appliances shall be A+ or greater to reduce energy requirements.
- It is anticipated that smart-metering will be installed to ensure a more detailed understanding of where and how energy is being used.

6.4 Overall, through maximising fabric efficiencies where feasible, the proposed energy strategy is considered consistent with the National Planning Policy Framework and London Plan. The

incorporation of roof mounted photovoltaic (PV) panels are not proposed due to the need to preserve the highly visible roofscape of the listed building.

Sustainability Standards

6.5 Formal assessment against the BREEAM Domestic Refurbishment Scheme (2014) is anticipated. The target rating of 'Very Good' is proposed, with aspiration for BREEAM 'Excellent'. This target is based on the sustainability and energy measures proposed, which are required to be appropriate to the historic nature and setting of the Listed building, and is in line with application 2018/4796/P.

Transport

6.6 Secure cycle storage will be provided to encourage building users to cycle so promoting exercise and helping reduce congestion and emissions.

Materials & Waste

6.7 The materials strategy for the development shall consider lifecycle environmental impacts, durability, responsible sourcing and pre-fabrication potential, with a view to optimising materials utilisation and safeguarding natural resources.

- Consideration shall be given to embodied carbon as part of the materials selection process for the refurbishment and extension, in addition to other factors such as structural properties, aesthetics and cost. As a minimum reference shall be made to the BRE's Green Guide to Specification for the major elements (walls, floors, roof) where applicable, with a view to targeting products with a predominantly 'A' or 'A+' rating.
- To ensure that timber comes from sustainable sources, all timber product suppliers will be required to demonstrate accreditation by the Forest Stewardship Council (FSC).
- A preference will also be given to products and suppliers which can demonstrate operation within the structure of a formal Environmental Management System (e.g., BS EN ISO 14001, EMAS, BES 6001) on the basis that environmental risks and impacts should be better controlled.
- Durability will form part of the design with features incorporated to ensure robustness and reduced risk of damage. This is to ensure longevity and reduced need for maintenance.
- Circular economy principles will be applied with consideration given to how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life.

- The developer will also endeavour to avoid the use of materials with a high VOC (volatile organic compound) content; therefore ensuring an improved air quality for the completed development.

- The operational waste strategy comprises provision of dedicated space of adequate size and in convenient locations for storage of general refuse, recyclables and food waste. Internal and external storage will be considerate of the Building Regulations and Council requirements.

Water

Water Conservation

6.8 Where required, water saving fittings and appliances shall be installed. The following outlines the proposed maximum flow / consumption rates for each of the proposed installation types:

- Dual flush toilets of 6/3 litres;
- Bath capacity to overflow to be ~100 litres;
- Shower flow rates to be ~7.75 litres / minute;
- Taps to have a flow rate <5litres / minute;
- Washing machine to be <9.5litres / kg;
- Dishwasher to be <1.25 litres / place setting.

6.9 Overall water consumption levels to be <105 litres / person / day.

6.10 The potential to incorporate a rainwater harvesting system will be considered as the design develops.

Drainage

6.11 The existing site is already developed and therefore consists of mostly impermeable ground, meaning the volume of water run-off over the development's lifecycle will be no greater than it would have been prior to the refurbishment and extension.

6.12 Drainage systems and wastewater discharge shall be designed in line with best practice guidance, to eliminate any pollution risks for watercourses and underground water.

7. Sustainable Construction Proposals

7.1 It is recognised that the construction industry has the potential to cause significant environmental impacts through resource use, waste generation and pollution. It is therefore proposed to manage the construction phase in a sustainable manner to ensure that these impacts are reduced.

Responsible Construction Practices

Impacts on Neighbours, Pedestrians, Road Users and Workforce

7.2 The scheme will be registered with the Considerate Constructors Scheme to ensure that the contractor carries out the construction operations in a safe and considerate manner, with due regard to local residents, road users, the workforce and the environment. A target of achieving a score of at least 35 and with a minimum score of 11 points in each of the three sections shall be set. This represents a high level of performance and a commitment to responsibly manage construction activities.

Environmental Management

7.3 It is expected that the principal contractor for the project shall also operate a third party certified Environmental Management System (EMS), demonstrating sound management and systematic control of environmental impacts.

Materials Optimisation and Waste

7.4 The Site Waste Management Plan (SWMP) will detail the design measures towards optimum use of materials, set specific targets for construction and demolition waste generation and appropriate mechanisms/protocols for segregating waste on-site and monitoring overall waste management.

7.5 The development will aim for more than 95% by tonnage of demolition and construction waste to be diverted from landfill as per minimum.

Pollution Prevention

Pollution Prevention Guidelines

7.6 The Environment Agency's (EA) Pollution Prevention Guidelines (PPG) shall be followed as appropriate to minimise pollution risks from construction activities; works will also be in line with the Environment Agency's Building a better environment, A guide for developers (2006) guidance.

Air Pollution

7.7 Best practice methods for minimising the formation of dust and emissions from construction activities shall be implemented, as appropriate to the specific site and proposed activities. Control measures may include:

- Appropriate site layout;
- Solid screens/barriers or other physical boundaries around dust/emission generating activities;
- Good site maintenance and regular inspections for liquid spillages; and
- Sealed storage for cement, sand and fine aggregates.

7.8 In addition to the above, the contractor shall comply with the BRE Code of Practice to control dust from construction and demolition activities.

Water Pollution

7.9 Appropriate measures shall be implemented to minimise risks of watercourse and underground water pollution, in line with EA's PPG 5 Works in, near or liable to affect watercourses and the Guide for developers Building a better environment, as stated above. Specific measures shall be outlined in the contractor's CEMP.

8. Summary

8.1 This Sustainability Statement provides an overview as to how the proposed scheme contributes to sustainable development in the context of the strategic, design and construction considerations.

8.2 Sustainability is a broad concept and covers a range of environmental, social and economic considerations. A review of the Camden's Council's planning policies has identified a number of requirements relating to sustainable development, and particular regard has been given to Policy D1 (*Design*), Policy CC1 (*Climate Change Mitigation*) and Policy CC2 (*Adapting to Climate Change*).

8.3 The proposed development will provide a refurbished and extended Grade II* Listed residential building.

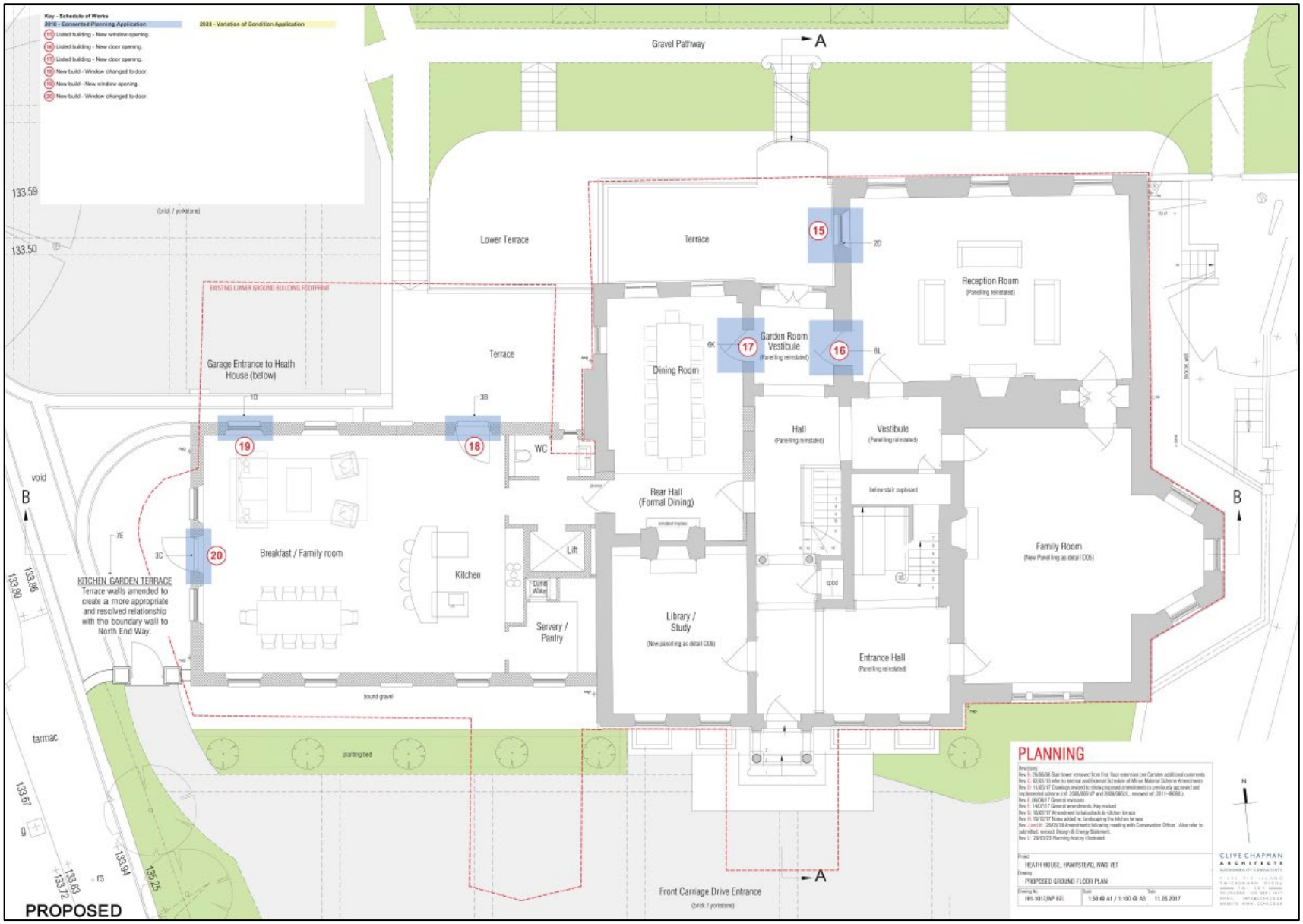
8.4 A range of sustainable design and construction features are proposed including:

- New highly thermally efficient building fabric;
- Highly efficient lighting;
- Water saving sanitary fittings and appliances to deliver a water efficient development (<105litre / person / day);
- The use of materials with a low lifecycle environmental impact and embodied carbon;
- Consideration of the principles of Secured by Design;
- Efficient construction and operational waste management;

8.5 Overall, the proposals for the scheme are in line with the overarching principles of sustainable development as well as the policy requirements of the planning authority.

Appendices

A. Site Plans


Key - Schedule of Works
2018 - Consented Planning Application
2023 - Variation of Condition Application
15 Listed building - New window opening.
16 Listed building - New door opening.
17 Listed building - New door opening.
18 New build - Window changed to door.
19 New build - New window opening.
20 New build - Window changed to door.
Gravel Pathway
A
133.59
133.50
Lower Terrace
Terrace
15
Reception Room
(Panelling reinstated)
EXISTING LOWER GROUND BUILDING FOOTPRINT
Garage Entrance to Heath House (below)
Terrace
Dining Room
Garden Room Vestibule
(Panelling reinstated)
17
16
Hall
(Panelling reinstated)
Vestibule
(Panelling reinstated)
19
18
WC
void
B
Rear Hall (Formal Dining)
below stair cupboard
Familly Room
(New Panelling as detail C06)
20
Breakfast / Family room
Kitchen
Lift
Dumb Waiter
Servery / Pantry
Library / Study
(New panelling as detail C06)
cpbd
Entrance Hall
(Panelling reinstated)
KITCHEN GARDEN TERRACE
Terrace walls amended to create a more appropriate and resolved relationship with the boundary wall to North End Way.
bound gravel
tarmac
planting bed
133.86
133.80
133.67
133.93
133.72
133.94
135.25
Front Carriage Drive Entrance
(brick / portstone)
PROPOSED
PLANNING
Project
HEATH HOUSE, HAMPSTEAD, NW3 1ET
Drawing
PROPOSED GROUND FLOOR PLAN
Drawing No.
HH-1017-MP 67.
Scale
1:50 @ A1 / 1:100 @ A3
Date
11.05.2017
CLIVE CHAPMAN ARCHITECTS

B. Key Local Planning Policy Requirements

Local Policy Framework

Camden Local Plan (July 2017)

The Local Plan was adopted by Council on 3 July 2017 and has replaced the Core Strategy and Camden Development Policies documents as the basis for planning decisions and future development in the borough. Policies relevant to this report are presented below:

Policy G1 Delivery and Location of Growth [extract]

The Council will create the conditions for growth to deliver the homes, jobs, infrastructure and facilities to meet Camden's identified needs and harness the benefits for those who live and work in the borough.

Delivery of Growth

The Council will deliver growth by securing high quality development and promoting the most efficient use of land and buildings in Camden by:

a) Supporting development that makes best use of its site, taking into account quality of design, its surroundings, sustainability, amenity, heritage, transport accessibility and any other considerations relevant to the site;

[…]

Policy D1 Design [extract]

The Council will seek to secure high quality design in development. The Council will require that development:

[…]

c) Is sustainable in design and construction, incorporating best practice in resource management and climate change mitigation and adaptation;

d) is of sustainable and durable construction and adaptable to different activities and land uses;

[…]

Policy D2 Heritage [extract]

The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments and historic parks and gardens and locally listed heritage assets.

[…]

Listed Buildings

Listed buildings are designated heritage assets and this section should be read in conjunction with the section above headed 'designated heritage assets'. To preserve or enhance the borough's listed buildings, the Council will:

i) resist the total or substantial demolition of a listed building;

j) resist proposals for a change of use or alterations and extensions to a listed building where this would cause harm to the special architectural and historic interest of the building; and

k) resist development that would cause harm to significance of a listed building through an effect on its setting.

Policy CC1 Climate Change Mitigation

The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

We will:

a) Promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;

b) Require all major development to demonstrate how London Plan targets for carbon dioxide have been met;

c) Ensure that the location of the development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;

d) Support and encourage sensitive energy efficiency improvements to existing buildings;

e) Require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and

f) Expect all developments to optimise resource efficiency.

For decentralised energy networks, we will promote decentralised energy by:

g) Working with local organisations and developers to implement decentralised energy networks in the parts of Camden most likely to support them;

h) Protecting existing decentralised energy networks (e.g. at Gower Street Bloomsbury, Kings Cross, Gospel Oak, and Somers Town) and safeguarding potential network routes; and

i) Requiring all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.

To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.

Policy CC2 Adapting to Climate Change

The Council will require development to be resilient to climate change.

All development should adopt appropriate climate change adaptation measures such as:

a) The protection of existing green spaces and promoting new appropriate green infrastructure;

b) Not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems;

c) Incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and

d) Measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

Any development involving 5 or more residential units of 500sqm or more of any additional floorspace is required to demonstrate the above in a Sustainability Statement.

<u>Sustainable Design and Construction Measures</u>

The Council will promote and measure sustainable design and construction by:

e) Ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;

f) Encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;

g) Encouraging conversions and extensions of 500 sqm of residential floorspace or above or five or more dwellings to achieve “excellent” in BREEAM domestic refurbishment; and

h) Expecting non-domestic developments of 500sqm of floorspace or above to achieve “excellent” in BREEAM assessments and encouraging zero carbon in new developments from 2019.

Policy CC3 Water and flooding

The Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible.

We will require development to:

a) incorporate water efficiency measures;

b) avoid harm to the water environment and improve water quality;

c) consider the impact of development in areas at risk of flooding (including drainage);

d) incorporate flood resilient measures in areas prone to flooding;

e) utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and

f) not locate vulnerable development in flood-prone areas.

Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.

The Council will protect the borough's existing drinking water and foul water infrastructure, including the reservoirs at Barrow Hill, Hampstead Heath, Highgate and Kidderpore

Policy CC4 Air quality

The Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.

The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.

Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.

Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.

Policy CC5 Waste

The Council will seek to make Camden a low waste borough.

We will:

a) aim to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031;

b) deal with North London's waste by working with our partner boroughs in North London to produce a Waste Plan, which will ensure that sufficient land is allocated to manage the amount of waste apportioned to the area in the London Plan;

c) safeguard Camden's existing waste site at Regis Road unless a suitable compensatory waste site is provided that replaces the maximum throughput achievable at the existing site; and

d) make sure that developments include facilities for the storage and collection of waste and recycling.

Policy DM1 Delivery and Monitoring [extract]

The Council will deliver the vision, objectives and policies of the Local Plan by:

[…]

d) Using planning contributions where appropriate to:

i. Support sustainable development;

C. General Notes

The report is based on information available at the time of the writing and discussions with the client during any project meetings. Where any data supplied by the client or from other sources have been used it has been assumed that the information is correct. No responsibility can be accepted by Ensphere Group Ltd for inaccuracies in the data supplied by any other party.

The review of planning policy and other requirements does not constitute a detailed review. Its purpose is as a guide to provide the context for the development and to determine the likely requirements of the Local Authority.

No site visits have been carried out, unless otherwise specified.

This report is prepared and written in the context of an agreed scope of work and should not be used in a different context. Furthermore, new information, improved practices and changes in guidance may necessitate a re-interpretation of the report in whole or in part after its original submission.

The copyright in the written materials shall remain the property of Ensphere Group Ltd but with a royalty-free perpetual licence to the client deemed to be granted on payment in full to Ensphere Group Ltd by the client of the outstanding amounts.

The report is provided for sole use by the Client and is confidential to them and their professional advisors. No responsibility whatsoever for the contents of the report will be accepted to any person other than the client, unless otherwise agreed.

These terms apply in addition to the Ensphere Group Ltd "Standard Terms of Business" (or in addition to another written contract which may be in place instead thereof) unless specifically agreed in writing. (In the event of a conflict between these terms and the said Standard Terms of Business the said Standard Terms of Business shall prevail.). In the absence of such a written contract the Standard Terms of Business will apply.

Ensphere Group Ltd
55A Catherine Place,
London, SW1E 6DY
+44 (0) 20 7846 9040
www.enspheregroup.com