101 Bayham Street, London, NW1 0AG

Planning Statement

Contents

1. Introduction

1.1. This Planning Statement is submitted on behalf of the Applicant, Railpen (known as 'the Applicant'), in support of Planning Permission for the proposed external minor alterations of 101 Bayham Street, London, NW1 0AG ('the Site'). The Local Planning Authority ('LPA') is the London Borough of Camden ('LBC').

1.2. This Planning Statement considers the planning considerations arising from the proposed scheme. It assesses the proposal in the context of planning policy and guidance with regard to relevant material considerations.

1.3. Overall, the proposed scheme seeks to extend the usable life of the building, bring it back into use and deliver a high-quality, sustainable office space. The proposed refurbishment sensitively and positively repositions the building within its setting in the Camden Town Conservation Area and within the Knowledge Quarter. It is our view that the proposal is in accordance with the policies of the development plan.

1.4. The remainder of this statement is set out as follows:

- Section 2 describes the Site and surrounding area;
- Section 3 outlines the pre-application process undertaken;
- Section 4 provides a description of the proposal;
- Section 5 sets out the relevant planning policy framework;
- Section 6 assesses the scheme against the development plan.

1.5. The application is supported by the following plans and documents:

- This Planning Statement, prepared by Savills;
- Cover Letter, prepared by Savills;
- Design and Access Statement, prepared by Henley Halebrown;
- Existing and Proposed plans, prepared by Henley Halebrown;
- Site Location Plan, prepared by Henley Halebrown;
- Heritage Townscape and Visual Assessment, prepared by The Townscape Consultancy;
- Energy and Sustainability Statement, prepared by Max Fordham;
- Noise Impact Assessment, prepared by Max Fordham; and
- Statement of Community Involvement, prepared by Marengo Communications.

2. Site and Surroundings

The Site

2.1. The Site is located on the southwest side of Bayham Street at 101 Bayham Street, London, NW1 0AG, in the London Borough of Camden, as shown in Figure 1. The Site area is 0.0595 hectares (595m^2), and the existing use is Use Class E(c).

Figure 1 – *Site Plan*

2.2. The Site comprises of a 5-storey (including basement) art moderne style building, which was built in the 1930s and a subsequent single storey rooftop extension built in the early 2000s. The building is currently vacant.

2.3. Bayham Street is characterised by a mix of commercial and residential uses, with a higher number of commercial uses at the northern end in which the Site lies.

2.4. The Site is located within the Camden Town Conservation Area and is not statutory or locally listed. The building is identified as a positive contributor within the Camden Town Conservation Area appraisal and management plan. The Site is located opposite St Martin in the Fields Almshouses, which is a Grade II Listed Building (List Entry Number: 1272268).

2.5. The Site is located in Flood Zone 1, an area of low probability.

2.6. The Site has a PTAL rating of 6(B), the highest possible score. The Site is located 160m from Camden Town Underground Station, which is serviced by the Northern Line. National and International rail links are also within close proximity to the Site at Euston, Kings Cross and St Pancras stations. Furthermore, the Site sits close to several bus stops, as well as the Cycle Superhighway C6 route.

Planning History

2.7. A summary of the Site's planning history is set out below:

Application Reference	Description of Development	Decision
2014/2620/P	Change of use from office (Class B1a) to residential (Class C3) to create 26 units at ground to fourth floor level. *NB – Planning permission was not implemented.*	Granted 05.06.2014
2011/2784/P	Installation of grille at rear ground floor level and louvred doors at ground floor level onto driveway under building in connection with the installation of an emergency generator internally to serve the offices (Class B1).	Granted 28.08.2011
2011/1795/A	Display of internally illuminated hanging sign for office (Class B1).	Granted 06.06.2011
2010/4397/P	Alterations to exterior of office building (Class B1a) to include replacing ground floor main entrance doors.	Granted 11.10.2010
2010/4406/A	Display of internally illuminated fascia signage for office (Class B1a).	Granted 15.06.2010

3. Pre-Application Engagement

3.1. The importance of pre-application engagement is set out in the National Planning Policy Framework ('NPPF') (2023) in which Paragraph 39 states that "Good quality pre-application discussion enables better coordination between public and private resources and improved outcomes for the community". The NPPF emphasises that there is significant potential to improve the efficiency and effectiveness of the planning system for all parties through early engagement. The importance of pre-application engagement and frontloading is further highlighted in the accompanying Planning Practice Guidance ('PPG').

3.2. A pre-application meeting was held with LBC on 29 June 2023. The Case Officer and Conservation Officer were present at the meeting from LBC. There were four points of discussion at the pre-application meeting:

- Heritage and design;
- Amenity
- Transport; and
- Sustainability

3.3. Officers were supportive of the principle of refurbishing the building and measures to improve access and sustainability, as well as consolidating the appearance of the plant at roof level. However, the Conservation Officer expressed concern about the proposal for the replacement of the existing Crittal style windows with timber composite windows and the resultant impact on the setting of the Camden Town Conservation Area. In response to the pre-application meeting, the proposed scheme has been amended to address the concern raised by the Conservation Officer.

3.4. Formal pre-application feedback was received from LB Camden on 3 August 2023. The principle of the proposed refurbishment work was supported, in particular the proposed improvements to the ground floor street-facing windows, provision of new cycle facilities and the sustainability and accessibility upgrades to the building. It was noted that the loss of any of the original entrance door surround would not be supported. In response to this, the proposed entrance has been designed to expose the existing underlying stone piers.

3.5. The pre-application letter from LBC can be found in Appendix 1.

4. Description of Proposal

4.1. The proposed scheme seeks minor alterations and refurbishment to the existing external building to create a high-quality, sustainable Category-A office. The proposed minor external alterations seek to re-activate the ground floor to animate Bayham Street, whilst upgrading the thermal performance and visual appearance of the fourth floor to reveal and celebrate the existing fabric and character of the building.

4.2. To achieve this, this application seeks permission for the following:

> *Alterations and refurbishment to existing building. Works to include installation of new 'Brise-soleil' screening at fourth floor, installation of new ground floor entrance door on Bayham Street/front façade, rear infill extension at fourth floor, insertion of new window to first floor of rear façade, infilling of windows to rear façade, replacement plant equipment at roof level, and associated works.*

5. Planning Policy Framework

5.1. In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the Development Plan unless other material considerations indicate otherwise.

5.2. This section of the Planning Statement sets out the relevant adopted national, regional and local planning policies pertinent to the Site.

Adopted Development Plan Documents

5.3. The Development Plan applicable to the proposed scheme is as follows:

- National Planning Policy Framework (NPPF) (2023)
- The London Plan (2021); and
- Camden Local Plan (2017).

5.4. The following Supplementary Planning Documents should be read in conjunction with and within the context of the relevant policies in Camden's Local Plan, the London Plan:

- Design Camden Planning Guidance (CPG) (2021); and
- Energy efficiency and adaptation CPG (2021).

6. Key Planning Considerations

6.1. This chapter of the Planning Statement assesses the proposed scheme against the identified policy framework for the Site, having regard to the material considerations. Consideration is given to the following key topics:

- Land Use
- Heritage and Conservation
- Sustainable Design
- Energy
- Transport

Land Use

6.2. Local Plan Policies E1 and E2 support securing a successful and inclusive economy in Camden by creating the conditions for economic growth, to support Camden's economy and provide employment opportunities.

6.3. The scheme proposes the continued use of the Site as an office (Use Class E(c)), ensuring that the building remains in Camden's existing stock of premises that are suitable for a variety of business activities. The proposed refurbishment ensures the existing office use of the Site is safeguarded as an employment site in the borough.

Design, Heritage and Conservation

6.4. London Plan Policy HC1 states that development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. In addition, Local Plan Policy D2 states the Council will preserve and, where appropriate, enhance Camden's heritage assets and their settings. The Councill requires that development within conservation areas preserves or, where possible, enhances the character or appearance of the area.

6.5. As previously identified, the Camden Town Conservation Area Appraisal identifies the Site as a building that makes a positive contribution to the conservation area. The proposed external alterations to the building have been sensitively designed to preserve the building's architectural character. The sensitive refurbishments have been designed to optimise the use of the Site and make a positive contribution to the visual quality of the townscape and animation along Bayham Street. As shown in Figure 2, the proposed reactivation of the ground floor improves the interaction with the street to enhance the Conservation Area.

6.6. The proposed architectural response reinforces the legibility of the Site within the street in which it sits. Furthermore, it rationalises the street wall by providing a more active ground floor and a much improved setback at the fourth floor to deliver high-quality office space and outdoor amenity.

6.7. The HTVIA submitted alongside this application illustrates the considerable improvement of the proposed scheme to the existing building, the surrounding townscape, and heritage assets in the nearby area including the conservation area. The proposed materials are of high quality to ensure they remain in keeping with both the retained elements of the host building and its immediate neighbours, whilst upgrading the building's appearance. In addition, the retention of the existing horizontal-lined windows, with secondary glazing to improve thermal performance, works well to both retaining the character of the frontage whilst providing thermal comfort for future use.

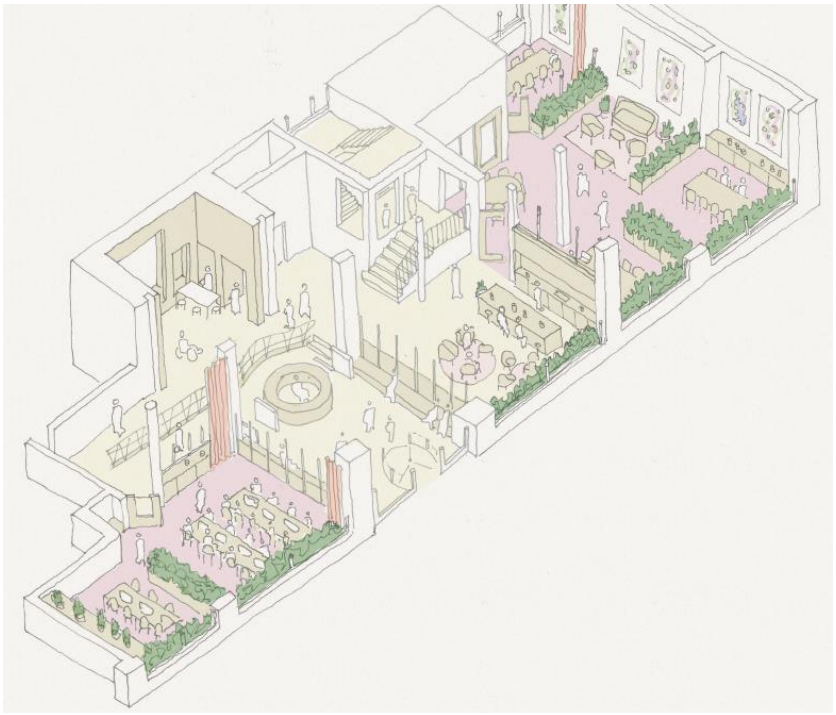

***Figure 2** – Reactivation at Ground Floor to improve streetscape along Bayham Street*

Sustainable Design

6.8. Policy SI 2 of the London Plan sets out the Mayor's commitment to London becoming a zero-carbon city. In addition, boroughs should ensure that all developments maximise opportunities for on-site electricity and heat production from solar technologies and use innovative building materials and smart technologies.

6.9. Policy D1 of the Local Plan states the Council will seek to secure high-quality, sustainable design in development, incorporating best practice in resource management and climate change mitigation and adaptation.

6.10. The existing building includes secondary glazing, and the roof and wall insulation throughout is limited, which are both likely to be poor performing. In addition, the existing building includes mechanical ventilation and mechanical cooling/heating systems using fan coils, which is over 10 years old. Furthermore, the existing building has an EPC rating of E (least efficient).

6.11. As stated in the Sustainability and Energy Statement submitted alongside this application, a BREEAM 'Excellent' has been targeted for the Site with aspirations towards 'Outstanding'.

6.12. The proposed refurbishment of the existing building will generate significant embodied carbon savings, compared to a new build scheme. The fabric of the building will be upgraded to meet the Greater London Authority's latest criteria for thermal performance for the refurbishment of commercial buildings. These interventions will also partly assist in improving the overall energy performance of the building from EPC E to EPC B. The below list identifies the interventions included in the alterations:

- Reinsulating the rooftop to improve thermal performance;
- Relining the external walls to improve U-Value performance to meet GLA requirements;
- Improving the thermal performance of external glazing;

- Where possible exposing thermal mass in the building to reduce heating and cooling loads;
- A draft lobby at Ground Floor will be installed to reduce thermal loss at Ground Floor Level; and
- Installing a solar shading device at the fourth floor to reduce overheating loads.

6.13. In addition, to further improve the energy performance of the building several upgrades are proposed for the MEP onsite, including:

- Replacement of new energy-efficient Air Handling Units;
- Air Source Heat Pumps installed at roof level to improve energy efficiency;
- PV panels at the roof level to provide green on-site energy generation; and
- Improved biodiversity through new planting at the fourth floor level.

6.14. The proposed external alterations to the existing building will optimise the sustainability performance by increasing the EPC rating from E to B, through high-quality design, and will target BREEAM 'Excellent', with aspirations towards 'Outstanding'. The proposed sustainable design approach will reduce carbon emissions, reduce energy costs to occupants and improve London's energy resilience. Therefore, it is our professional opinion that the proposed scheme accords with Policy SI 1 of the London Plan and Policy D1 of the Local Plan.

Energy

6.15. Local Plan Policy CC1 states that the Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards, including supporting and encouraging sensitive energy efficiency improvements to existing buildings. Local Plan Policy CC4 ensures that the impact of development on air quality is mitigated and ensures that exposure to poor air quality is reduced in the borough.

6.16. In accordance with London Plan Policy SI 1, development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to retro-fitted mitigation measures. Furthermore, London Plan Policy SI 4 states that development proposals should minimise adverse impacts on the urban heat island

6.17. The building is operating a poor-performing U-value as a result of the existing condition of the windows, limited roof and wall insulation, mechanical ventilation and cooling/heating systems using fan coils, and no passive measures currently included to reduce heat gains and overheating.

6.18. The proposed refurbishment will improve the energy efficiency of the building, targeting an EPC rating of B, by enhancing the fabric performance of existing walls, roof and windows, reducing heat gains through passive shading and improved window G value, and introducing PV panels at roof level to provide a source of renewable energy. In comparison to a new build scheme, refurbishing the existing building will generate significant embodied carbon savings.

6.19. Many of the existing MEP installations within the building are at the end of their useful working life or are now redundant. Therefore, a new energy strategy has been developed for the Site following the "Be Lean, Be Clean and Be Green" energy hierarchy. The proposed "Be Lean " measures result in a 15% reduction in regulated carbon dioxide emissions (3.4 tonnes CO_2 per annum) compared to national performance. There are no relevant measures to be incorporated at the "Be Clean" stage as there are no existing heat networks, or currently proposed heat networks, at close enough proximity to the Site where it is technically feasible and financially viable to connect to. The proposed "Be Green" measures provide a further 17% (4.0 tonnes CO_2 per annum) reduction in regulated carbon dioxide emissions resulting in a total cumulative saving of 32%.

6.20. The proposed improvements to the energy efficiency of the building will reduce the CO2 emissions for the existing building and therefore mitigate its impact on climate change within the borough. Therefore the proposed refurbishment alterations to the existing building are in accordance with Local Plan Policies CC1, CC4 and London Plan Policies SI 1 and SI 4.

Transport

6.21. Local Plan Policy T1 promotes sustainable transport methods by prioritising walking, cycling and public transport in the borough. renewable energy.

6.22. The Site has a PTAL rating of 6(B), the highest possible score, and is well served by the Northern Line from Camden Station, as well as national and international rail links from nearby Euston and Kings Cross St Pancras stations. The proposed internal provision of the cycle storage at the basement level will provide high-quality facilities that promote cycle usage, including improving the design of the changing rooms, showers and lockers.

6.23. The proposed provision of the basement cycling facilities will encourage journeys by bicycle in accordance with Local Plan Policy T1

7. Conclusion

7.1. In conclusion, the proposal outlined within this application seeks to improve and upgrade the sustainability performance of the existing building to ensure the Site's continued employment use. The proposed refurbishments will contribute towards the Council's aim at tackling the causes of climate change in the borough by improving the building's overall energy efficiency. The proposal will accord with the relevant planning policies referenced in the previous section and make a positive contribution to the Conservation Area and wider Knowledge Quarter.

Appendix

Planning Solutions Team
Planning and Regeneration
Culture & Environment Directorate
London Borough of Camden
2nd Floor
5 Pancras Square
London
N1C 4AG

www.camden.gov.uk/planning

Date: 02/08/2023
Our ref: 2022/5655/PRE
Contact: Brendan Versluys
Direct line: 020 7974 3202
Email: brendan.versluys@camden.gov.uk

Savills
33 Margaret Street
London
W1G 0JD

Dear Amelia Hunt,

Re: 101 Bayham Street, London, NW1 0AG

Thank you for submitting the above pre-planning application enquiry on 23/12/2023 for refurbishment works and alterations to the roof extension of the existing office building.

The required fee of £1,138.09 was received on 12/01/2023. A virtual meeting was held on 29/06/2023.

Site constraints

- Camden Town Conservation Area
- Article 4 – Basements

Relevant policies and guidance

National Planning Policy Framework 2021

The London Plan 2021

Camden Local Plan 2017

A1 Managing the impact of development
E1 Economic Development
D1 Design
D2 Heritage
CC1 Climate change mitigation
CC2 Adapting to climate change
T1 Prioritising walking, cycling and public transport
T2 Parking and car-free development

Camden Planning Guidance

Amenity (2021)
Design (2021)
Transport (2021)
Energy efficiency and adaptation (2021)

Camden Town Conservation Area Appraisal and Management Plan (2007)

Site description

The application site accommodates a 1930s era mid-rise storey office building, with a recessed fourth-floor rooftop level, built as a later addition in the early-mid 2000s. The building also has a basement level. There is no record on Council's file of a consent for the rooftop fourth floor.

The building is currently vacant and is awaiting refurbishment.

The site is located within the Camden Town Conservation Area and is identified as a positive contributor. The site is positioned within the commercial area of the conservation area which is characterised by its early C20th commercial buildings. The site is opposite the GII listed almshouses of St Martin's in the Fields and is visible from St Martin's Gardens which are identified as a significant landscape, although not in a conservation area.

Relevant Planning History

2010/4397/P - Alterations to exterior of office building (Class B1a) to include replacing ground floor main entrance doors. **Granted 11/10/2010**

2011/1796/P - Replacement of windows and installation of canopy at ground floor level on front elevation of offices (Class B1). **Granted 06/06/2011**

2013/8216/P - Change of use from office (Class B1a) to residential (Class C3) to create 26 units at ground to fourth floor level. **Refused Prior Approval 07/02/2011**

2014/2620/P - Change of use from office (Class B1a) to residential (Class C3) to create 26 units at ground to fourth floor level. **Granted 05/06/2014**

Proposal

The overall proposal is to refurbish (interior and exterior) and construct a small addition at the fourth-floor rooftop level. Alterations to the building would be made to the ground floor street facing façade and at rooftop level where new plant,railings and screens are

proposed. Existing windows on the street facing façade at the ground floor and upper levels would be replaced.

In terms of internal refurbishment works, the refurbishment of the building would extend across all upper floors (from first to fourth) and would improve the quality and flexibility of the existing workspace. This would include the removal and replacement of the existing windows and the maximisation of ceiling heights and floor area. At ground floor level, the applicant proposes to refurbish the lobby area and create flexible spaces that employees and customers can use for both recreation and work purposes.

For the external refurbishment works, the proposal seeks to alter the existing ground floor frontage of the building to increase permeability and further activate the ground floor frontage, creating an improved relationship with the street.

At roof level, provision of new plant and screening together with improvements to the existing communal roof terrace is proposed together with a small infill extension (approximately 20.6m²) to the rear at fourth floor level.

The proposed refurbishment works seek to incorporate a number of sustainability upgrades to the building, principally to improve the building's thermal/energy performance.

Assessment

The planning considerations material to the determination of this application are as follows:

- Heritage and design
- Amenity
- Transport
- Sustainability

Heritage and design

Impact of proposed works on significance of conservation setting:

Roof extension:

The existing roof extension was constructed in the early-mid 2000s and is of limited quality, although is relatively reticent in wider views with the exception of the plant on top. The applicant proposes to erect a combined edge protection and *brise-soleil to the roofline of the extension*. A replacement railing (of similar appearance to the screen) to the terrace is also proposed. Although the design and appearance of the proposed screen is not typical of 1930s moderne architecture, it would sit entirely on the later, 2000s addition of the building and would not unduly compromise the legibility of the host building as a 1930 commercial structure. The rooftop screen is of an appropriate scale and design, although a more muted colour (such as flat grey or bronze) may be more successful in avoiding drawing visual attention to the roof extension, which is the weakest part of the building

from an aesthetic point of view. The screen would not meaningfully screen the plant in wider views but the proposals do not result in a worsening of plant visibility at roof level.

The replacement of the terrace railing is supported.

Windows:

Crittal windows at front façade upper floors:
The windows on the upper floors of the building are of a typically 'Crittal' design. It is unclear if the windows are original to the 1930s or a sympathetic later replacement. Nevertheless, the windows' glazing bars and general appearance suit the building and contribute to its overall proportions and historic appearance. In terms of adverse effects to the host building and conservation area, there is no objection to thermal upgrades within the building (such as secondary glazing) which allow the existing windows to be retained, nor is there an objection to the like-for-like replacement of the general appearance of the existing windows with a double glazed system if the benefits of replacement can outweigh the loss of potentially historic windows. However, replacement of the windows with a different design, i.e. the omission of horizontal glazing bars, would not be supported and would be contrary to the Conservation Area Appraisal and Management Strategy:

The appearance of characterful buildings within the Conservation Area is harmed by the removal or loss of original architectural features and the use of inappropriate materials.
In all cases the Council will expect original architectural features and detailing to be retained, protected, refurbished in the appropriate manner, and only replaced where it can be demonstrated that they are beyond repair.

Ground floor front façade windows:
The removal of the window decals at ground floor is supported and the replacement of the ground floor windows is acceptable. The alteration of the existing entrance doors is acceptable but the loss of any of the original door surround would not be supported. The existing stone, or reconstituted stone, piers are an important and dignified element of the design of the façade despite later cladding. An accessible entrance could be created within the existing structural fabric.

Further opportunities for enhancement:

The entrance door has been clad in metal (with permission). However, the stonework beneath is fluted and of decorative quality. Reverting to the original finish would enhance the contribution the building makes to the street-scene and conservation area:

ORIGINAL ENTRANCE

EXISTING ENTRANCE

Conclusion (Heritage and design):

The scheme has clearly been carefully considered and is appropriately 'light touch' for positive contributor within a conservation area. However, elements of the proposals affect the historic detailing of the host building, eroding its character as a 1930s commercial building. There is a tension between some of the proposed alterations to the windows and desire to improve the building's energy/thermal performance. If the alterations to the windows and doors were to be submitted as they stand then the application would likely be refused as these works would not preserve or enhance the character and appearance of the conservation area.. However, with the amendment of the door and window proposals in line with the advice above, the scheme would likely be supported.

Transport

The proposal involves converting former office space at basement level into cycle storage space, accessed via the lift at the rear of the site. The cycle storage includes provision for a cycle maintenance station, lockers and showers to encourage active travel to and from work. The cycle storage would accommodate 36 cycle spaces (including 2 x separate accessible cycle spaces, located at ground floor level). The new cycle facilities which are intended to meet London Plan cycle parking standards, are welcomed.

The floor plans indicate cycle storage would be in the form of Sheffield stands and what appear to be a number of vertical stands. It is recommended that the vertical stands be replaced with Sheffield stands.

Given that this is predominantly for the refurbishment of the building and only proposes a small increase in new floor space, a Section 106 car free agreement would not be required.

The site will continue to be serviced as at present from outside the site on Bayham Street and via the rear service yard. There is not expected to be any material increase in the number of deliveries or servicing movements.

The building can be refurbished without the need for a Construction Management Plan and associated contribution and bond. The parking bays outside the front of the site on Bayham Street can be suspended to enable the storage of skips and for the delivery of

materials to the site. Any scaffolding required for the alterations can be placed on the footway subject to the licensing process, separate to planning permission. Any damage that occurs to the footway would be covered by the scaffolding bond. As such a highways contribution is not considered necessary for the proposed works.

Amenity

The proposed additional plant, railings and extension of the existing rooftop fourth floor, have the potential for impacts to sunlight / daylight to adjacent buildings to the rear, specifically to 128-138 Camden High Street. The submitted application should demonstrate what the impact is, and how it's been taken into account in the design of the proposed works.

The proposed works would unlikely result in an increase in overlooking compared to the existing situation.

The noise of proposed new rooftop plant would need to be assessed within a Noise Impact Assessment Report.

Overall, the scope for external amenity effects is likely to be more constrained due to the nature of the proposal being principally for refurbishment of an existing building.

Sustainability improvements

The proposed works include improvements to the building's energy/thermal performance, to improve sustainability outcomes. Improvements may also be proposed to the building's drainage system.

General energy & sustainability requirements are outlined below:

Major Non-Residential Conversions (or refurbishments to existing buildings)

The application must include an Energy Statement, showing how the development will meet the following policy requirements:

- Aim for zero carbon (London Plan para 9.2.1 refurbishment should aim to meet S1 2 A). Follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies set out in the London Plan 2021.
- GLA guidance on preparing energy assessments and CPG 'Energy Efficiency and Adaptation' should be followed. In particular, improvements should be sought on the minimum building fabric targets set in Part L of the building regulations
- CC1 requires all developments to achieve a 20% reduction in CO2 emissions through renewable technologies (the 3rd stage of the energy hierarchy) wherever feasible, and this should be demonstrated through the energy statement. The reduction is to be calculated against emissions at the previous hierarchy stage and NOT against the baseline emissions.
- Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.

The applicant is also expected to submit a Sustainability Statement - the detail of which to be commensurate with the scale of the development showing how the development will:

- Implement the sustainable design principles as noted in policy CC2
- Achieve BREEAM Non-Domestic Refurbishment 'Excellent' rating and minimum credit requirements under Energy (60%), Materials (40%) and Water (60%).
- The development should meet or exceed the London Plan target of 95% reuse/recycling/recovery of construction and demolition waste and 95% of excavation waste put to beneficial use.

Site-specific comments:

The Council's Sustainability Officer is broadly supportive of the proposed scheme and its aims to achieve a sustainable retrofit sensitive to the architectural quality of the existing building.

Solar Panels

The following detail should be included in submitted proposals:

Solar PV:	• Panel/ array size
	• Layout drawings – confirming the panels are appropriately spaced
	• No. of panels
	  - An estimate of the electricity that the photovoltaic modules will generate including the assumptions for the calculations.
	  - A calculation of the CO2 savings that may be realised through the use of this technology.
	• Panels should face within 90 degrees of south
	• Overshadowing impact assessment should be undertaken. The shading analysis should include an assessment of the height of existing buildings and any permissions granted for buildings near the application site.
	• Maintenance details should be provided

Air-Source Heat Pumps (ASHP)

The following detail should be included in submitted proposals:

ASHP	• Is an air-air or air-water system proposed? • Centralised systems preferred for major developments • Applicant should provide details of COP (NB technology should have a COP of 4 to be considered renewable / Seasonal Performance Factor of at least 2.5) and Energy Efficiency ratio (EER). • Calculation of CO2 savings realised through the technology • Metering details should be provided – including estimated heating costs to occupants, demonstrating that the costs have been minimised through energy efficient design.

	• System should comply with minimum performance standards as set out in the ECA and MCS certification requirements.

Active Cooling

It is proposed to replace the existing mechanical ventilation and cooling with an upgraded ASHP set-up. The cooling hierarchy should be applied and passive design measures utilised to minimise overheating and ultimately minimise the size and energy use of the replacement plant. An overheating assessment should be utilised for options appraisal to maximise the efficacy of passive design measures. Requirements are set out in the table below:

Cooling hierarchy 1. Minimising internal heat generation through energy efficient design 2. Reducing the amount of heat entering the building in summer 3. Use of thermal mass and high ceilings to manage the heat within the building 4. Passive ventilation 5. Mechanical ventilation	CGP Energy efficiency states that a full model of the building should be carried out to ensure the building design optimises solar gain and daylight without resulting in overheating. Consider maximising the use of natural systems within buildings before any mechanical services are considered. The development should demonstrate that measures to adapt to climate change have been implemented and that overheating risk has been managed. The GLA Energy Assessment Guidance requires information demonstrating that the risk of overheating has been mitigated through the incorporation of passive design measures, particularly design measures relevant to an outline application i.e. building orientation and external context (location of buildings in relation to noise/pollution which may limit ventilation, landscaping proposals etc.) Basic overheating compliance tests must be undertaken to demonstrate compliance with Building Regulation, however this test does not cover all factors which influence overheating. Therefore the GLA guidance states that developers should carry out dynamic thermal modelling. Where dynamic modelling is carried out, it should be undertaken in accordance with the guidance and data sets in TM49: Design Summer Years for London. It is also recommended that developers consider CIBSE TM52 The Limits of Thermal Comfort: Avoiding Overheating in European Buildings and for residential schemes. Where cooling is proposed, the applicant should provide details, including: efficiency, ability to take advantage of free cooling and renewable cooling sources. The

	application should identify elements that need cooling.

Mechanical Ventilation with Heat Recovery (MVHR)

MVHR is proposed for the majority of the building due to noise constraints along Bayham Street. MVHR performs best when the building envelope is sufficiently airtight.

The application should confirm whether any measures being proposed to increase the airtightness of the building, and whether a target airtightness is to be set.

Fabric Performance

The sensitive replacement of windows in order to improve the thermal performance of the building is supported. A very significant proportion of the buildings heat loss will be through poorly performing windows so it is key to get this element right.

It is unclear whether there are any other measure proposed to improve the fabric performance of the building i.e. roof/wall insulation. Council would encourage an extensive and holistic improvement of the buildings fabric to maximise the opportunity to increase its thermal performance.

Green Infrastructure

Green infrastructure and biodiversity (including green/brown roofs)	The Council will expect all developments to incorporate brown roofs, green roofs and green walls unless it is demonstrated this is not possible or appropriate. This includes new and existing buildings. Please refer to section 10 of CPG 'Energy Efficiency and Adaptation' for further details. Under CC3 for water and flooding and CC2 adapting to climate change our preference is for green / blue hybrid roofs as these bring greater resistance to drought and hence longer sustainability. They also reduce strain on the sewers. For example we would expect to see minimum soil depth of 100mm, sufficient upstands to contain storm water, and suitable flow controls from the roof. Details required include: • the design objectives for the green or brown roof or green wall • details of its construction and the materials used, including a section at a scale of 1:20 • planting details, including details of the planting technique, plant varieties and planting sizes and densities.

	• a management plan detailed how the structure and planting will be maintained

Conclusion

The principle of the proposed refurbishment works are supported, in particular the proposed improvements to the ground floor street facing windows, provision of new cycle facilities and the sustainability and accessibility upgrades to the building.

As outlined, the alterations to the upper floor windows and ground floor entrance doors should be reconsidered, to ensure the character of the 1930s building is retained.

Subject to the above advice being adopted as part of the proposed scheme, the application would likely be supported.

Any project arising will be assessed according to policies D1 and D2 of Camden's Local Plan of 2017, and section 72 of the NPPF. This, among other things, requires Camden to take account of the desirability of sustaining and enhancing the significance of heritage assets; and to weigh harm caused to such assets by development against public benefits accruing therefrom, including securing the asset's optimum viable use.

Refer to Camden's CPG Energy Efficiency and adaption (2021) for further guidance relating to the proposed energy/thermal upgrades

The proposed works are would likely be acceptable in terms of amenity effects, subject to the provision of a more detailed assessment of amenity effects to adjacent properties.

This document represents an initial informal officer view of your proposals based on the information available to us at this stage and would not be binding upon the Council, nor prejudice any future planning application decisions made by the Council.

If you have any queries about the above letter or the attached document please do not hesitate to contact Brendan Versluys on **020 7974 3202**.

Thank you for using Camden's pre-application advice service.

Yours sincerely,

Brendan Versluys

Senior Planning Officer
Planning Solutions Team