

# Sustainability Statement

**By:** CB/BM  
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1. This Sustainability Statement has been prepared by DWD in support of a full planning application for a change of use of the ground floor of the existing building from F1 (Educational Use) to C3 (dwellinghouses) and installation of skylight in rear flat roof, and installation of 3no. windows to the southeast ground floor elevation at 81b Belsize Park Gardens and 24 Lambolle Place, London NW3 4NJ (the "Site").
  2. This statement will summarise the initiatives utilised throughout the project and explain how the project responds to local, regional, and national planning policies relating to energy and sustainability.
  3. This statement should be read alongside the plans and other supporting information submitted with this planning application. This statement will provide an appropriate level of policy assessment proportionate to the type and amount of development proposed.

## Local Plan Policies

4. Green Action for Change: Camden's environmental sustainability plan (2011- 2020) commits Camden to a 27% borough wide Carbon Dioxide (CO2) reduction by 2017 and a 40% borough wide CO2 reduction by 2020 (London carbon reduction target). Over 90% of Camden's carbon dioxide emissions are produced by the operation of buildings.
5. Any new development in Camden has the potential to increase carbon dioxide emissions in the borough. If we are to achieve local, and support national, carbon dioxide reduction targets, it is crucial that planning policy limits carbon dioxide emissions from new development wherever possible and supports sensitive energy efficiency improvements to existing buildings.
6. Local Plan Policy CC1 'Climate change mitigation' requires all development to minimise the effects of climate change through passive design measures and low energy consumption. The explanatory paragraph 8.8 notes that all developments involving five or more dwellings and/or more than 500 sqm of (gross internal) any floorspace will be required to submit an energy statement demonstrating how

the energy hierarchy has been applied to make the fullest contribution to CO2 reduction. All new residential development will also be required to demonstrate a 19% CO2 reduction below Part L 2013 Building Regulations (in addition to any requirements for renewable energy). This can be demonstrated through an energy statement or sustainability statement.

7. The 2021 update to Part L Building Regulations Volume 1: Dwellings came into effect from 15<sup>th</sup> June 2022 and superseded the 19% reduction in the Camden Local Plan 2017, however Part L only refers to new build developments and is not applicable to change of use applications. It is noted that the application will be required to meet the latest building regulation guidance separately to the planning permission regime.
8. Local Plan Policy CC2 'Adapting to climate change' requires development to be resilient to climate change through adaption measures. Any development involving 5 or more residential units or 500 sqm or more of any additional floorspace is required to demonstrate the above in a Sustainability Statement.
9. The Camden Planning Guidance (CPG) on Energy efficient and adaption (adopted January 2021) ('Energy CPG') supports Local Plan Policies CC1 and CC2 and sets out in Chapter 6 the criteria for Energy Statements and Sustainability Statements. Table 1a of the Energy CPG sets out the criteria for energy statements by development type. The carbon reduction targets for developments in Camden are outlined in Table 2a of the CPG, however as noted above this is not applicable to change of use applications.
10. Table 1a of the Energy CPG notes that residential refurbishments up to 4 units and <500sqm are not required to provide an energy statement, however a sustainability statement to demonstrate how the sustainable design and construction principles, and climate change adaptation measures, have been incorporated into the design. Energy Demand Reduction
11. The below measures demonstrate how sustainable design and climate change adaption measures have been incorporated into the proposal. The nature of the application site and the retention of the existing building means that some elements remain fixed and there would be no opportunity to change them but those that could be influenced by the redevelopment have been.

#### Internal Layout

12. The internal layout has been designed to best utilise the existing building form. Dual and triple aspect internal layouts have been provided to provide the most natural light into rooms considered the most habitable to reduce the need for artificial lighting and to provide natural ventilation.

13. Daylight and Sunlight testing was carried out by Rights of Light Consulting to inform the internal layout and the architectural design and need for additional windows to habitable rooms. A full report by Rights of Light is submitted as part of this application.
14. Internal blinds will be provided as part of the interior change of use. Whilst exterior works would increase external shading better, it is acknowledged the application relates to the ground floor only and changes to the exterior of the building were kept to a minimum given its location in a Conservation Area.
15. As part of the change of use the internal insulation will be upgraded where possible to improve thermal performance and reduce the overall energy demand of the building.

#### Building Fabric

16. Enhancing the thermal performance of the building envelope helps to future-proof the structure and also yields the greatest CO2 savings. Given the buildings forms part of the Belsize Park Conservation Area, and the application site concerns only the ground floor, there are no proposed changes to the external appearance of the building aside from the new windows.
17. The precise details of all fabric elements are not known at this stage. However, all newly proposed windows and external doors installed as part of the will need to comply with Part L (Conservation of Fuel and Power) and Part B (Fire Safety) of the building regulations in all cases.

#### Energy Efficiency

18. All new lighting will be installed as LED fittings and the installation will have a target average luminous efficacy of >100 Lumens per circuit watt.
19. The proposed development does not include any new sources of on-site combustion and will adopt and all-electric energy strategy. New/upgraded central heating systems will be more efficient with upgraded heating controls to ensure comfortable temperatures in separate room zones.
20. All new appliances and equipment will be selected to be the most energy efficient as per the appliance's energy label to reduce the amount of electricity used per product.

#### Water Demand

21. The water demand for the building will be managed by the use of low water volume appliances and fittings in conjunction with Automatic Flow Limiting Valves (AFLVs) where required, to meet the limit of 110 litres per person per day (including 5 litres for external water use).

#### Sourcing of Materials

22. Limited materials are required as the scheme comprises the re-use of an existing building. Where materials are required, consideration will be given to the sourcing of these materials to ensure

materials are resourced responsibly. As required by London Plan Policy SI7 it is recommended and should be targeted that 95% of construction and demolition waste should be reused/ recycled and 95% beneficial use of inert evacuation waste.

### **Conclusion**

23. The existing building is to be substantially retained and improved as part of the change of use application. Where changes are proposed to the building fabric the proposed materials will comply with the relevant parts of Building Regulations.
24. As the application site refers to the ground floor only of an existing building there are limited opportunities for significant reductions in CO<sub>2</sub> emissions. However, the energy hierarchy has informed the refurbishment so that many of the internal and external works to the building will provide a significant improvement. This results in the following;
  - Dual and triple aspect internal layouts informed by daylight level optimisation and additional windows added where necessary to reduce the need for artificial lighting.
  - Dual and triple aspect internal layouts reduce the need for artificial cooling
  - Improved internal wall insulation to reduce energy demand.
  - All new fixtures and fitting will be energy efficient and low flow water volume.