# Holborn Links Project 7 – 31 Southampton Row

Sustainability Statement
Stage 2
15095-WAT-XX-XX-RP-V-59001 P01

April 2024

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## Quality Assurance – Approval Status

This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

| Issue | Date | Prepared by | Checked by | Approved by |
|---|---|---|---|---|
| P01 | 03/05/2024 | Hiba Talmoust | Shaun Carpenter | Dr Ankit Singh |

**Comments**

| | |
|---|---|
| P01 | Draft issue for comment |

**Comments**

## Disclaimer

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We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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# 1. Introduction

## 1.1 Background

This report has been prepared by Waterman Building Services to accompany an application for full planning permission for Holborn Links Project 7, located in the London Borough of Camden ("the Site"), hereafter referred to as 'the Proposed Development'.

This Sustainability Statement prepared by Waterman Building Services Limited describes the approach the design team has taken to integrate and consider sustainability during the design process. The purpose of this report is to assess the extent of which the Development accords with the principles of sustainable development and the relevant planning policy requirements.

The project team for the Development is comprised as follows:

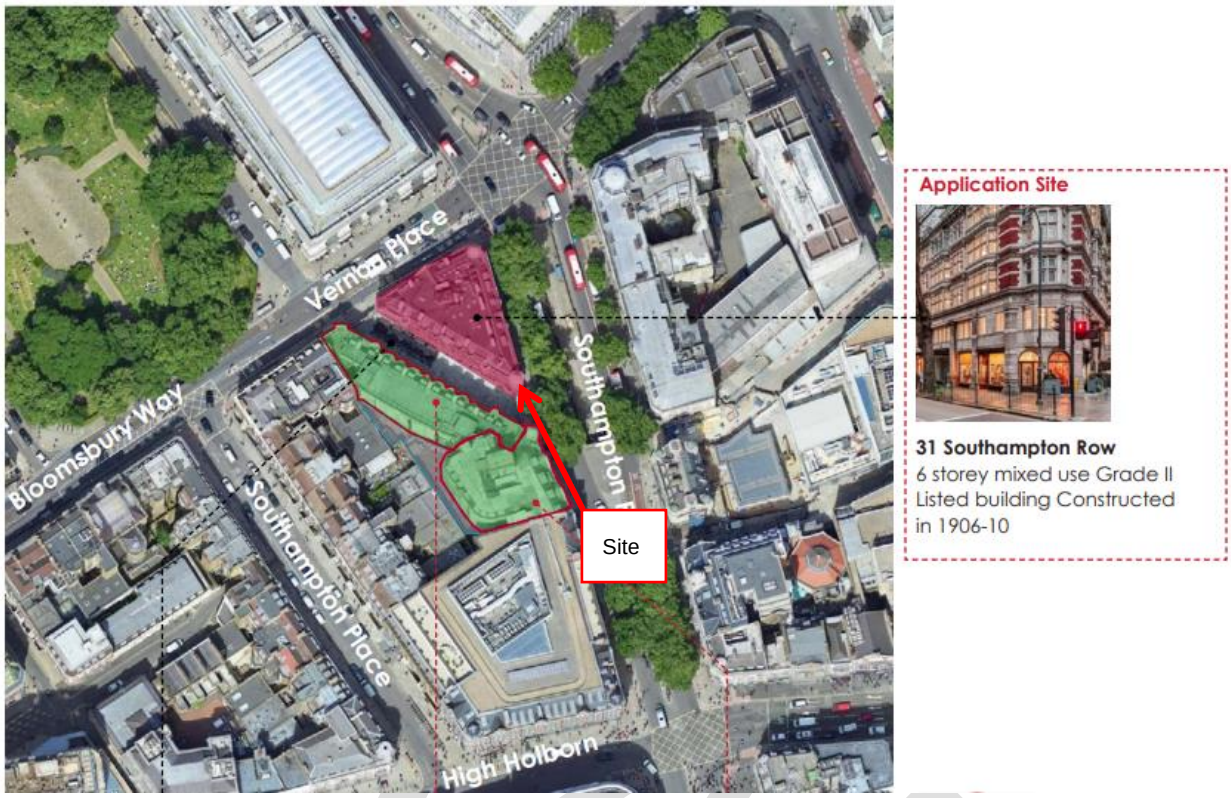
Table 1: Project team

| Project team | Representative |
|---|---|
| Development Manager | Alchemy Asset Management |
| Project Manager | Savills |
| Planning Consultant | HGH Consulting |
| Architect | Hale Brown Architects |
| Cost Consultant | Gleeds |
| Structural Engineer | Heyne Tillett Steel |
| Energy Consultant | Waterman Group |
| Ecologist | Waterman Group |
| Transport Consultant | Markides Associates |
| Air Quality Consultant | Waterman Group |
| Noise Consultant | Waterman Group |
| Townscape and Heritage Consultant | Iceni |

## 1.2 Site Context

The site is located at 31 Southampton Row, Holborn, London, WC1B 5HJ. The Site forms part of Bloomsbury Quarter (previously known as the Holborn Links Estate) and the proposed refurbishment follows a suite of planning applications seeking to upgrade and revitalise the commercial and office accommodation across the Estate.

Figure 1: Location of the Site




*Source: Design & Access Statement, Hale Brown Architects, April 2024*

## 1.3 Proposed Development

The Planning Statement submitted to the London Borough of Camden (the LPA) as part of the application submission is as follows:

> *"Full planning and listed building consent for internal refurbishments and external alterations, including creation of a new office entrance on Sicilian Avenue, reconfiguration of retail units, cycle parking, shower and changing facilities, and associated works."*

No change of use is proposed with this application. The key elements of the proposed works are as follows:

- Reconfiguring the retail units to help to meet market expectations, while maintaining the nature and feeling of Sicilian Avenue as a parade of smaller shops;
- The addition of an office entrance on Sicilian Avenue, to improve the arrival experience to the offices;
- Re-establishing the historic entrance from Vernon Place, to improve the arrival experience for residential occupiers;
- Reduction of the structural spine walls to the upper office floors to meet market expectations and improve the existing accommodation;
- Creation of new cycle and shower facilities at lower ground, with a dedicated entrance off

Southampton Row;

- Reconfiguring and improving the office WC facilities;
- Upgrading of office floor servicing to facilitate wider energy and sustainability improvements;
- Reinstatement of the grand historical staircase;
- Upgrades to parts of the roof structure to accommodate a new dedicated plant compound area

Figure 2: Proposed Computer Generated Image, Sicilian Avenue – Southampton Row Retail Corner

# 2. Planning Policies for Sustainable Design

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

## 2.1 National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) was last revised in 2021. The framework sets out the Government's strategy for economic, environmental and social planning policy with the aim of promoting sustainable development in England. The NPPF includes a presumption in favour of sustainable development. This means local authorities will seek opportunities to secure developments that improve the economic, social and environmental conditions in the area.

## 2.2 The London Plan, The Spatial Development Strategy for London (2021)

"As the overall strategic plan for London, [the London Plan] sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years".

The London Plan dedicates multiple policies to Sustainable Design principles:

Policy GG6 Increasing Efficiency and Resilience

Policy D8 Public Realm

Policy D9 Tall Buildings

Policy D13 Agent of Change

Policy D14 Noise

Policy HC1 Heritage Conservation and Growth

Policy G1 Green Infrastructure

Policy G5 Urban Greening

Policy G6 Biodiversity and Access to Nature

Policy G7 Trees and Woodlands

Policy G9 Geodiversity

Policy SI1 Improving Air Quality

Policy SI2 Minimising Greenhouse Gas Emissions

Policy SI3 Energy Infrastructure

Policy SI4 Managing Heat Risk

Policy SI5 Water Infrastructure

Policy SI7 Reducing Waste and Supporting the Circular Economy

Policy SI8 Waste Capacity and Net Waste Self-Sufficiency

Policy SI10 Aggregates

Policy SI12 Flood Risk Management

Policy SI13 Sustainable Drainage

## 2.3 Mayor of London's 'Sustainable Design and Construction': Supplementary Planning Guidance' (SPG) (2014)

The framework within the SPG (2014) outlines both 'Mayor's Priority' (MP) mandatory policy requirements and 'Mayor's Best Practice' (MBP) preferred policy requirements. It provides implementation guidance on London Plan Policy 5.3 - Sustainable Design and Construction and a range of other London Plan policies, primarily in Chapters 5 and 7, which deal with matters relating to environmental sustainability.

## 2.4 Local Plan, London Borough of Camden (2017)

The following guidance is from the London Borough of Camden Local Plan (2017), which covers the Core Strategy and Development Policies up to 2031. The Local Plan is the principal planning document that sets out the vision, objectives and detailed spatial strategy for future development in the Borough. It includes specific strategic policies and targets, development management policies and site allocations. The following policies are most relevant in securing sustainable design:

Policy E2 – Employment Premises and Sites

Policy A1 – Managing the Impact of Development

Policy A2 – Open Space

Policy A3 – Biodiversity

Policy A4 – Noise and Vibration

Policy D1 – Design

Policy D2 – Heritage

Policy CC1 – Climate Change Mitigation

Policy CC2 – Adapting to Climate Change

Policy CC3 – Water and Flooding

Policy CC4 – Air Quality

Policy CC5 – Waste

Policy T1 – Prioritising Walking, Cycling, and Public Transport

Policy T2 – Parking and Car-free Development

# 3. Sustainability Review of the Development

The desktop policy review has identified the following sustainability priority themes for the Development:

- Design and Amenity;
- Energy;
- Water;
- Sustainable Drainage and Flood Risk;
- Nature Conservation and Biodiversity;
- Materials;
- Waste;
- Sustainable Transport and Accessibility;
- Pollution and Nuisance; and
- Heritage

## 3.1 Design and Amenity (E2, A1, D1, CC2)

*"*The Council will seek to protect the quality of life of occupiers and neighbours*."* **– Policy A1 Managing the Impact of Development**

*"*The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions*."* **– Policy D1 Design**

Table 2: Design and Amenity

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy E2 Employment Premises and Sites<br>Policy A1 Managing the Impact of Development<br>Policy D1 Design<br>Policy CC2 Adapting to Climate Change |
| **London Plan (2021)** | Policy D4 Delivering Good Design<br>Policy E1 Offices<br>Policy E3 Affordable Workspace |
| **Objectives, requirements and targets** | |
| • Ensure the existing building is not suitable for its existing business use, and that the possibility of retaining, re-using, or redeveloping the site has been fully explored<br>• Ensure the protection of amenities for the community, occupiers, and neighbours<br>• Be sustainable in design and construction<br>• Pursuing building certification standards such as BREEAM or Home Quality Mark | |

### 3.1.1 Location

All the buildings are Grade II listed and are located within the Bloomsbury Conversation Area. To the north of the site is Bloomsbury Square Gardens, London's oldest square, laid out in 1665. The northern corner of the site is visible from the gardens.

Built between 1906-1910, Sicilian Avenue and Vernon & Sicilian Houses were designed as a pedestrianised shopping street of individual small retail units at ground and basement with flats above. However, in subsequent years, the flats were converted into office spaces with the removal of all the chimney stacks and fireplaces.

### 3.1.2 Design

In line with the overall high sustainability aims of the Proposed Development, the development will meet BREEAM 'Excellent' rating (Ref. 1).

## 3.2 Energy (CC1, CC2)

*"The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards"* – **Policy CC1 Mitigating Climate Change**

*"All development should adopt appropriate climate change adaptation measures such as measures to reduce the impact of urban and dwelling overheating."* **– Policy CC2 Adapting to Climate Change**

Table 3: Energy

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy CC1 Mitigating Climate Change<br>Policy CC2 Adapting to Climate Change |
| **London Plan (2021)** | Policy SI2 Minimising Greenhouse Gas Emissions<br>Policy SI3 Energy Infrastructure<br>Policy SI4 Managing Heat Risk |
| **Objectives, requirements and targets** | |
| • Promote Zero Carbon design<br>• Application of the cooling hierarchy to reduce overheating risk<br>• Achieve a minimum on-site reduction of at least 35% beyond Building Regulations Part L<br>• Generate at least 15% of energy needs from renewable energy | |

The Energy Assessment produced by Waterman Building Services (**Error! Reference source not found.**Ref. 2) for the Proposed Development has taken a three-step approach to reducing the building's carbon dioxide emissions in line with the energy hierarchy detailed in the London Plan:

**Be Lean** - Reduce the building's energy requirements by incorporating passive and active design measures and using energy efficient mechanical and electrical engineering systems.

**Be Clean** - Reduce the building's carbon dioxide emissions by supplying energy more efficiently including through the supply of heat and electricity delivered by and district heating networks.

**Be Green** - Reduce the building's carbon dioxide emissions through the use of renewable technologies.

### 3.2.1 Be Lean

"Be Lean" measures refer to passive design and energy efficient solutions. The Proposed Development is seeking to maximise the potential of the measures by the strategy outlined in the following sections. In order to reduce the energy demand of the development, a mixture of a fabric first approach (to maximise passive savings) and active measures will be implemented.

Table 4: Fabric Thermal Performance – Notional Building (GLA recommendations)

| Element | Unit | Specification (GLA guide notional figure) |
|---|---|---|
| External Wall | W/m²K | 0.55 |
| Roof | W/m²K | 0.18 |
| Floor | W/m²K | 0.25 |
| Glazing | W/m²K | 1.8 |
| | g-value | 0.40 |
| Air permeability | ($m^3$/h $m^2$ @ 50 Pa) | 25 (the original construction date ~1910) |
| Thermal Bridging | W/m²K | default |
| Heating (Direct) | SCOP | 1.00 |
| Heating (ASHP) | SCOP | 2.50 |
| Hot Water | SCOP | 2.00 |
| Cooling (VRF) | SEER | 5.00 |
| Central ventilation SFP | W/l/s | 2.20 |
| Terminal Extract SFP | W/l/s | 0.50 |
| Heat Recovery | % | 0.70 |
| Lighting | lm/Watt | 60 |

The development is receiving upgrades to the roof and partial upgrades to glazing. For energy modelling of existing elements u-values from SAP guidance have been used based on a pre-1929 building.

Table 5: Fabric Performance

| Element | Unit | Specification Performance Values | |
|---|---|---|---|
| | | Existing Fabric remain as original construction | New Fabric Elements |
| External Wall | u-value W/m²K | 2.1 | - |
| Roof | u-value W/m²K | - | 0.18 |
| Basement Ceiling Concrete block & Asphalt | u-value W/m²K | 2.34 | - |
| Floor | u-value W/m²K | 1.2 | - |
| Retained Glazing | u-value W/m²K | 5.75 | - |
| | g-value | 0.85 | - |
| New Glazing | u-value W/m²K | - | 1.60 |
| | g-value | - | 0.60 |
| Air permeability | ($m^3$/h $m^2$ @ 50 Pa) | 25 (the original construction date ~1910) | - |
| Thermal Bridging | W/m²K | default | - |

### 3.2.2 Be Clean

In accordance with GLA Energy Assessment Guidance and London Plan Policy SI3, the energy systems for the site have been determined in accordance with the following hierarchy:

1) Connection to local existing or planned heat networks.

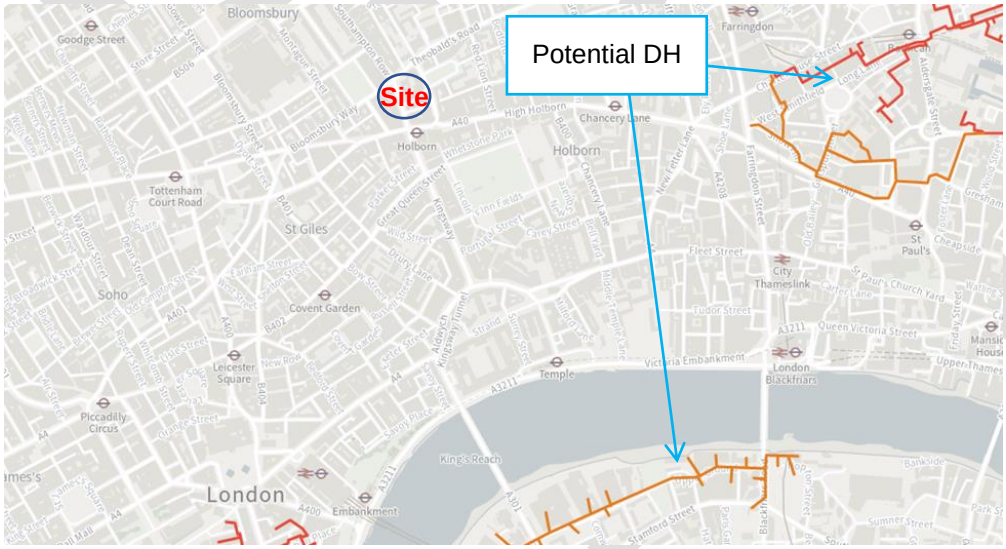
2) Use zero emission or local secondary heat sources (in conjunction with heat pump if required)

3) Use low-emission combined heat and power (Only where there is a case for CHP to enable the delivery of an area wide heat network, meet the developments electricity demand and provide demand response to the local electricity network)

4) Use ultra-low NOx gas boilers in a communal energy system, energy in the form of heat, cooling, and/or electricity is generated from a central source and distributed via a network of insulated pipes to surrounding residencies and commercial units.

The area surrounding the Site has been analysed to establish the availability of heating networks and CHP sites from which the Site could benefit. The closest existing district heating route (detailed in orange in the figure below) is ~1200m from the development, with proposed extensions detailed in red. The space heating is currently based on ASHP strategy and there will be no allowance for future connectivity to future district heating network when route is expanded to the Site. As this is an existing building, there is no available plant space to make an allowance for future district heating. Therefore, the use of district heating has not been considered for the development.

Figure 3: Proximity to Available DH Network - London Heat Map




## 3.2.3 Be Green

The use of energy conversion technologies using renewable energy have been reviewed and summarised below. The main technologies available for on-site renewable energy generation are:

- Biomass
- Ground Source Heat Pumps
- Air Source Heat Pumps
- Water Source Heat Pumps
- Solar Thermal Hot Water Generation
- Photovoltaic Panels
- Wind

Of the above, Air Source Heat Pumps have been found to be viable options due to the significant reduction in running costs and carbon emissions. All other options have been discounted against inclusion within the design due to visual impact, unsuitability of site, and air quality impact.

Following the Energy Hierarchy, the existing building emissions rate prior to refurbishment was calculated and predicted to be 41% worse than the GLA notional baseline emissions rate. The refurbished building is predicted to achieve a 1 % improvement over baseline emission using SAP10.2 emission factors, of which the 42% reduction comes from energy efficiency measures at Be Green Stage. This highlights the importance of the Building Services although fabric efficiency improvements are limited due to the nature of the grade II listed status of the existing building.

Table 6: Regulated Emission savings from each stage of the Energy Hierarchy for non-residential building

| **Development Carbon Dioxide Emissions from each stage of the Energy Hierarchy:** | | | |
|---|---|---|---|
| | Total Regulated Emissions (Tonnes $CO_2$/year) | $CO_2$ Savings (Tonnes $CO_2$/year) | Percentage Saving % |
| Be Lean | 38.5 | -11.2 | -41 |
| Be Clean | 38.5 | 0.00 | 0 |
| Be Green | 27.0 | 11.5 | 42 |
| Cumulative Savings | 11.5 | 0.3 | 1 |

A summary of the proposed energy efficiency measures required to deliver the above performance are:

- Fabric thermal improvement to large roof
- Upgrading glazing to office floors
- Mechanical ventilation heat recovery on main ventilation plant
- Energy efficient dimmable LED light fittings with daylight and presence detection control
- Air source heat pump (ASHP) systems for heating and cooling
- ASHP fed hot water system (HWS) generation plant for basement changing room area in addition to instantaneous hot water

## 3.3 Water (CC3)

*"We will require development to incorporate water efficiency measures."* **– Policy CC3 Water and Flooding**

Table 7: Water

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy CC3 Water and Flooding |
| **London Plan (2021)** | Policy SI5 Water Infrastructure |
| **Objectives, requirements and targets** | |
| • Incorporate water efficiency measures | |

Within the BREEAM Non-Domestic Refurbishment (NDR) 2014 (Ref. 3), three credits out of a possible five have been targeted for Wat 01: Water Consumption. This corresponds to a 40% improvement over the baseline. Three credits available for Wat 02: Water Monitoring and Wat 03: Leak detection system

have been targeted. These are respectively for the specification of a water meter on the mains water supply to each building and the installation of a leak detection system to detect major water leak on the mains water supply and flow control devices to regulate the supply of water to each WC area/facility according to demand.

## 3.4 Sustainable Drainage Systems and Flood Risk (CC2, CC3)

*"All development should adopt appropriate climate change adaptation measures such as not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems."* **– Policy CC2 Adapting to Climate Change**

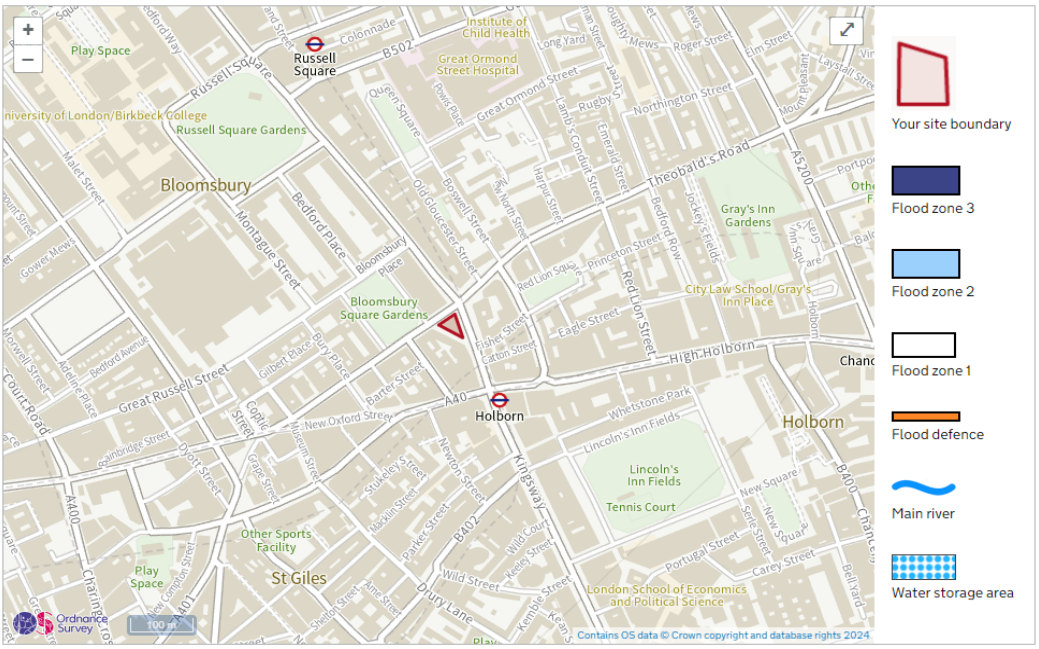
*"Ensure that development does not increase flood risk and reduces the risk of flooding where possible."* **– Policy CC3 Water and Flooding**

Table 8: Sustainable Drainage Systems and Flood Risk

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy CC2 Adapting to Climate Change<br>Policy CC3 Water and Flooding |
| **London Plan (2021)** | Policy SI12 Flood Risk Management<br>Policy SI13 Sustainable Drainage |
| **Objectives, requirements and targets** | |
| • Maintaining and, where possible, reducing surface water run off<br>• Avoid harm to the water environment and improve water quality<br>• Achieve greenfield runoff rates through the drainage hierarchy, utilising SuDS | |

The London Flood Map confirms that the Site is located in Flood Zone 1 as shown on the figure below, denoting a low risk of flooding from rivers and the sea.

Figure 4: Flood Risk Zoning Map



## 3.5 Nature Conservation and Biodiversity (A2, A3)

*"To secure new and enhanced open space and ensure that development does not put unacceptable pressure on the Borough's network of open spaces, the Council will seek developer contributions for open space enhancements."* – **Policy A2 Open Space**

*"The Council will protect and enhance sites of nature conservation and biodiversity… and seek to secure additional, trees and vegetation"* – **Policy A3 Biodiversity**

Table 9: Nature Conservation and Biodiversity

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy A2 Open Space<br>Policy A3 Biodiversity |
| **London Plan (2021)** | Policy G1 Green Infrastructure<br>Policy G5 Urban Greening<br>Policy G6 Biodiversity and Access to Nature<br>Policy G7 Trees and Woodlands<br>Policy G9 Geodiversity |
| **Objectives, requirements and targets** | |
| • Apply a standard of 0.74 sqm of open space per occupant for commercial buildings.<br>• Protect and enhance biodiversity leading to a net gain to achieve an Urban Greening Factor (UGF) of 0.3<br>• Incorporate additional trees where possible<br>• Minimise the loss of trees and vegetation of significant amenity, historic, cultural or ecological value | |

There are no ecological features included as part of the Development proposals.

## 3.6 Materials (D1)

*"The Council will require that development… is sustainable in design and construction and… comprises details and materials that are of high quality and complement the local character"* – **Policy D1 Design**

Table 10: Materials

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy D1 Design |
| **London Plan (2021)** | Policy D9 Tall Buildings<br>Policy SI7 Reducing Waste and Supporting the Circular Economy |
| **Objectives, requirements and targets** | |
| • Incorporate best practice in resource management and climate change adaptation and mitigation<br>• Materials should be high quality and complement the local character | |

The scope of the design proposals is limited to a refurbishment and so the construction materials are therefore reduced when compared to a full new construction. Through this approach, resource efficiency is enhanced resulting in significant mitigation of embodied carbon impact.

A Whole Life Carbon Assessment is not required for this scheme for planning. However, the embodied carbon impact is addressed under the BREEAM 2014 Non-Domestic Refurbishment and Fit-Out Mat01 Life Cycle Assessment.

The principles of circular economy will also be considered, and employed as thoroughly as possible throughout the design, including:

- Building in Layers
- Designing Out Waste
- Designing for Longevity
- Designing for Adaptability or Flexibility
- Designing for Disassembly
- Using Systems, Elements, or Materials that can be Reused and Recycled

## 3.7 Waste (CC5)

*"The Council will seek to make Camden a low waste borough"* – **Policy CC5 Waste**

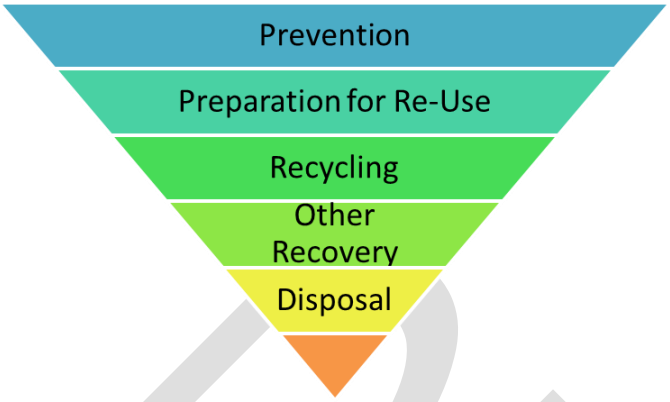
Table 11: Waste

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy CC5 Waste |
| **London Plan (2021)** | Policy SI7 Reducing Waste and Supporting the Circular Economy<br>Policy SI8 Waste Capacity and Net Waste Self Sufficiency |
| **Objectives, requirements and targets** | |
| • Reduce the waste produced in the borough and increase recycling and reuse of materials to meet the London Plan targets.<br>• Ensure developments include facilities for the storage and collection of waste and recycling.<br>• Meet or exceed the municipal waste recycling target of 65% by 2030<br>• Meet or exceed the targets for each of the following waste and material streams:<br>– Construction and demolition – 95% reuse/recycling/recovery<br>– Excavation – 95% beneficial use | |

The Whole Life Carbon Assessment and Circular Economy Statement are not required for this scheme for planning, however, the principles of both have been embedded in the design. Through the nature of refurbishments, significant retention of the existing building will prevent a large amount of demolition and construction waste from arising. In doing so, this satisfies the adoption of the Waste Hierarchy to manage waste at every stage from Excavation, Demolition, Construction, Operation, and End of Life.

The Waste Hierarchy guides contractors in how to manage waste at its highest value, to minimise the impact on natural resources by prioritising the prevention of waste, before reusing and recycling any that does arise. What cannot be reused or recycled will require investigation into other forms of recovery such as energy from waste, resorting to disposal once all other options have been exhausted.

Figure 5: Waste Hierarchy




### 3.7.1 Prevention

Prevention of waste has taken place through the early design decision to retain the majority of the existing building where feasible. This extends to the existing windows, where additional panes are being added to single glazing as a retrofitting option, rather than replacing the full glazing unit.

Prevention can also be achieved by minimising the quality of materials used. For example, the adoption of an open floor plan will minimise waste associated with plasterboard, and paint. This may have additional benefits of improving air circulation within the building for internal air quality.

### 3.7.2 Preparation for Re-Use

When designing for disassembly through a modular construction method, preparation for re-use is more straightforward, as elements may only need unscrewing from one another and cleaned. Through disassembly, manufacturers may also offer ‘’take-back schemes’’ where the materials will either be re-used or sent to specialist recycling centres.

In other cases, such as concrete, preparation may include crushing the material to be reused as aggregate. Communal refuse and recyclable stores will be easily accessible to all users and sized to cater the segregation and storage of operational recyclable waste volumes by the assessed buildings, its occupants and activities. Where organic waste is to be stored, a water outlet is provided within the facility for cleaning and hygiene purposes.

In the context of the Proposed Development, the Raised Access Flooring presents an ‘easy win’ with many suppliers offering takeback schemes at the end of the product’s installed lifespan, to be processed and reused in future building projects.

### 3.7.3 Recycling

Where it has been identifies that reuse is not possible, the material may still be recycled into a secondary material. Examples may include window frames that have been damages, or structural steel sections that have been bent.

During the operation of the building, recycling points for waste should be provided throughout the site to encourage the building occupants to recycle as much as possible.

### 3.7.4 Other Recovery and Disposal

Once opportunities for reuse and recycling have been exhausted, other forms of recovery should be investigated, such as energy from the combustion of waste, or composting of biodegradable material.

Finally, only when no other viable methods of waste handling are available, may the waste be considered for landfill.

## 3.8 Sustainable Transport and Accessibility (T1, T2)

*"The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough"* – **Policy T1 Prioritising Walking, Cycling, and Public Transport**

*"The Council will limit the availability of parking and require all new developments in the borough to be car-free"* – **Policy T2 Parking and Car-free Development**

Table 12: Sustainable Transport and Accessibility

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy T1 Prioritising Walking, Cycling, and Public Transport<br>Policy T2 Parking and Car-free Development |
| **London Plan (2021)** | Policy T1 Strategic Approach to Transport<br>Policy T2 Healthy Streets<br>Policy T4 Assessing and Mitigating Transport Impacts<br>Policy T5 Cycling<br>Policy T6 Car Parking |
| **Objectives, requirements and targets** | |
| • Provide adequate access for all modes, including walking, cycling and public transport.<br>• Ensure the public realm is permeable – easy and safe to walk through – and is adequately lit<br>• Reduce travel needs and encourage high-density, high-trip generating development around transport modes.<br>• Must be car-free and use legal agreements to ensure that future occupants are aware they are not entitled to on-street parking permits. | |

Summary provided below from WebCAT planning tool - Transport for London (tfl.gov.uk):

Public Transport Accessibility Levels (PTALs) provide a guide to the relative accessibility of a site. PTAL scores range from 1 to 6b, where 6b is the highest score and 1 is the lowest. The Transport for London PTAL calculator indicates a PTAL of 6b, the highest possible score across the entirety of the Site.

The nearest tube station to the site is Holborn, located approximately 250 metres away, served by the Central Line and the Piccadilly Line. Tottenham Court Road tube station is located approximately 720m from the Site and Chancery Lane tube station is approximately 815m from the Site. Within a 10 minute walk from the Site, 25 different bus routes can be accessed, providing transport links across London.

## 3.9 Pollution and Nuisance (A1, A4, CC4)

*"The Council will seek to protect the quality of life of occupiers and neighbours."* – **Policy A1 Managing the Impact of Development**

*"The Council will seek to ensure that noise and vibration is controlled and managed."* – **Policy A4 Noise and Vibration**

*"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."* – **Policy CC4 Air Quality**

Table 13: Pollution and Nuisance

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy A1 Managing the Impact of Development<br>Policy A4 Noise and Vibration<br>Policy CC4 Air Quality |
| **London Plan (2021)** | Policy D8 Public Realm<br>Policy D13 Agent of Change<br>Policy D14 Noise<br>Policy SI1 Improving Air Quality |
| **Objectives, requirements and targets** | |
| • Mitigate the impacts where it is demonstrated that the development could cause harm to air quality.<br>• Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts.<br>• Propose remediation to deal with any identified land contamination<br>• Minimise the noise impact from deliveries and from the demolition and construction phases of development.<br>• Ensure that artificial lighting causes minimal disturbance to occupiers and wildlife. | |

### 3.9.1 Air Quality

An Air Quality Assessment has been undertaken by Waterman Infrastructure and Environment Ltd. (Ref. 4) to consider the potential air quality impacts resulting from demolition, construction and operation of the Proposed Development upon existing sensitive receptors as well as the suitability of the Application Site for the introduction of new sensitive receptors.

The main likely effect on local air quality during construction relates to dust emissions. A range of mitigation measures to minimise or prevent dust emissions, including those relating to construction vehicles, would be implemented through the construction works. This would ensure effects would be not significant at all local sensitive receptor locations.

In accordance with the London Plan all construction plant would need to adhere to the emissions standards for NO2 and PM10, as required for Non-Road Mobile Machinery. As such, it is considered the effects associated with construction plant would be not significant.

The Proposed Development would not result in a change in Annual Average Daily Traffic of more than 100 light duty vehicle flows or 25 heavy duty vehicle flows. The change in vehicle flows would therefore be below the Environmental Protection UK and Institute of Air Quality Management (EPUK/IAQM) guidance criteria. In addition, the Proposed Development would not include a generator or any other centralised combustion plant, and therefore would not give rise to any significant adverse air quality impacts.

Based on the low trip generation and absence of a centralised combustion plant, EPUK/IAQM guidance suggests that the Proposed Development is not expected to give rise to air quality impacts. As such the likely effect of the operational Proposed Development on local air quality would not be significant.

A review of local monitoring data, and Defra background maps, conclude that concentrations for future residential users of the Proposed Development would be not significant.

### 3.9.2 Contaminated Land

A contaminated land assessment is not required for this development due to the refurbishment works.

### 3.9.3 Noise

A Planning Noise Assessment has been undertaken by Waterman Infrastructure & Environment Ltd (Ref. 5) to quantify the existing ambient and background noise levels, based on noise surveys at the Site in April 2024, to establish any necessary design constraints on noise emissions.

Waterman conducted baseline noise surveys consisting of short term attended noise measurements on 8th April 2024 at ground floor level together with a long-term unattended noise measurement from 18th – 23rd April on the roof of 31 Southampton Row to established prevailing baseline noise conditions.

To minimise the potential noise impacts of the proposed development, noise limits for any new items of fixed external building services plant have been set at the nearest sensitive receptors on the basis of the modal background noise levels established during the noise survey. The limits were set at 10 dB below the prevailing background noise level. This threshold is based on the guidance provided in BS 4142:2014+A1:2019 and is therefore in line with the noise assessment guidelines within Chapter 6 of the London Borough of Camden's Supplementary Planning Guidance Document – Amenity and Camden's Local Plan.

BS8233 internal noise level criteria are likely to be exceeded when external facing windows are open on the 5th floor where residential use is proposed. Provided the windows and ventilation to habitable rooms provide suitable sound insulation, BS8233 criteria would be satisfied.

Overall, it is considered that with suitable noise mitigation measures in place to control the noise emissions of the proposed fixed mechanical plant items, the noise impacts of the development proposals would be negligible. A full assessment of the potential noise impacts of the proposed building services plant should be carried out by a suitably qualified acoustician once selections have been finalised.

### 3.9.4 Light Pollution

External lighting will be designed in line with BREEAM Non-Domestic Refurbishment (NDR) 2014 Pol 04 criteria to ensure that upward lighting is minimised, reducing unnecessary light pollution, energy consumption, and nuisance to neighbouring properties.

## 3.10 Heritage (D2)

*"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, historic parks and gardens and locally listed heritage assets."* – **Policy D2 Heritage**

Table 14: Heritage

| **Relevant applicable policies** | |
|---|---|
| **Camden Local Plan (2017)** | Policy D2 Heritage |
| **London Plan (2021)** | Policy HC1 Heritage Conservation and Growth |
| **Objectives, requirements and targets** | |
| • Minimise harm and loss of significance of heritage assets | |

A Heritage Statement has been undertaken by ICENI Projects (Ref. 6) to outline the Site and its surrounding area's historical evolution and identify any relevant designated heritage assets. It also assesses the potential impact of the proposed development on the Site, its setting and the overall character and appearance of the Conservation Area. Site Visits were undertaken throughout 2023, and a desk-based study was also undertaken which included review of the Bloomsbury Conservation Area Appraisal, and an Ordnance Survey map regression.

The setting and significance of the heritage assets have been identified and appraised. Using this assessment of significance to inform, the impact of the proposed scheme has been robustly considered, both with regard to the impact on the significance and special historical and architectural interest of the Grade II listed building and the special character and appearance of the Bloomsbury Conservation Area.

The proposed development has been approached with an overall concept which prioritises historic fabric, minimising interventions, and reinstating historic form where possible. A comprehensive approach has been taken to understand the historic development and phasing of the original buildings.

Overall, it is considered that the proposed development would be sympathetic to the Site and to the setting of the surrounding heritage assets, and would preserve the character of the existing building while enhancing its contribution to the Conservation Area through necessary aesthetic and functional repairs.

Furthermore, due to the nature of the proposals, no harm is anticipated to the character and appearance of the Conservation Area (and the significance of other heritage assets within it) from the Proposed Development.

In summary, the Heritage Statement concludes that the proposals are considered to be a highly thoughtful and appropriate approach to the Site, enabling the restoration, protection, and enhancement of the Grade II listed building. The proposal has been developed with a whole site approach to ensure long-term future-proofing for the assets, and the heritage-led approach will ensure that the significance of the heritage asset and its setting will be protected, and where possible, enhanced.

While there is a potential risk of a low-level of harm to the Site through the marginal loss of historic fabric, it should be noted that the historic value of the Site will be preserved and there are heritage benefits and substantial public benefits offered by the proposal as a whole.

Therefore, the proposals are considered to be in line with the requirements of Section 66 of the 1990 Act, and Local Plan Policies A1, D1, and D2; in that the significance of the Conservation Area would be preserved and/or enhanced, and that the standard of design is exceptionally high-quality and contextually appropriate for Bloomsbury. The proposed development adheres to the NPPF tests outlined in paragraphs 206 to 208. If a net low level of less-than-substantial harm is identified, considering the heritage benefits of the scheme and design mitigation measures, it must be weighed against the benefits, which are detailed within the Heritage Statement and in the accompanying Planning Statement.

The proposals seek to improve the functionality of the building and its performance, whilst being sympathetic to the historic building, recognising the special interest the asset has. As such a number of benefits arise from the proposals. These include, but are not exclusive to the following:

- Providing spaces which will ensure the continued use of the building, aiding its long term viability and maintenance;
- Sensitive repair and restoration of key historic features of interest including existing windows, brickwork and stonework. This includes revealing features which have historically been concealed;
- Removal of all redundant services both internally and externally, improving the appearance and

sustainability / efficiency credentials of the Site;

- Reinstatement of the historic staircase; and,
- Creation of retail units which appeal to the market aiding with the revitalisation of Sicilian Avenue.

# 4. Conclusion

This report demonstrates the Applicant's commitment to delivering a sustainable development to support the implementation of the London Borough of Camden's Local Plan. To ensure the successful delivery of sustainable development, the key initiatives and commitments highlighted in this document would need to be implemented, monitored and reviewed during the detailed design, construction stages and subsequently during the operational phase of the Development. The Development includes a range of sustainable design and construction features including:

- Implementation of a 'fabric first' approach, in line with the Energy Hierarchy, to minimise the operational energy demand of the Proposed Development
- Implementation of lean design principles to minimise embodied carbon of the development including the incorporation of low carbon and recycled materials and materials with lower wastage rate.
- The provision of water efficient/low flow sanitaryware fittings and fixtures throughout the Proposed Development to reduce potable water consumption and foul flow.
- Allowance for sufficient waste storage areas to accommodate dedicated recyclable waste storage area with easy access and servicing.
- Development of a Site Waste Management Plan (SWMP) to cover non-hazardous waste related to on-site construction. *To be confirmed*
- Specification of materials with a low environmental impact and/or a responsible sourcing certification. As a minimum all timber products will be FSC or PEFC certified with full chain of custody.
- Significant retention of the existing building to minimise the embodied carbon impact, demolition and construction waste, and ensure high levels of resource efficiency.

In addition to the above, the Proposed Development targets a BREEAM Rating of 'Excellent' under BREEAM Non-Domestic Refurbishment and Fit-Out 2014.

# 5. References


Ref. 1 Waterman (2024) BREEAM Office Refurbishment 2014 Pre-Assessment

Ref. 2 Waterman (2024) Energy Strategy report

Ref. 3 Waterman (2024) BREEAM Office Refurbishment 2014 Pre-Assessment

Ref. 4 Waterman (2024) Air Quality Assessment

Ref. 5 Waterman (2024) Planning Noise Assessment

Ref. 6 Iceni Projects (2024) Heritage Statement

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