Report to Amend Planning Condition 5

for

8 Guildford Street
London
WC1N 1DA

On behalf of

DCCM Fashion Limited

4536/DH/MS
Issue 4
16 January 2025

Report to Amend Planning Condition 5
at 8 Guildford Street
London
WC1

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Table of Contents

Appendices

1.0 Introduction

This document has been produced to amend Planning Condition 5.

The Planning Stages report states:

> **14.0 OVERHEATING**
>
> The commercial area will be cooled via a new highly efficient VRF air source heat pump system therefore overheating will not be an issue.
>
> The residential area will have openable windows for a purely naturally ventilated scenario and cooling will be avoided as per the cooling hierarchy.

The Condition stipulates:-

> 5 Prior to occupation of the development, the applicant will have constructed and implemented all the measures contained in the Sustainability Statement prepared by Quinn Ross Energy, rev 1, reference P2787-SUS-01 and such measures shall be permanently retained and maintained thereafter. The measures shall include the installation of a meter to monitor the energy output from the approved renewable energy systems.
>
> Reason: In order to secure the appropriate energy and resource efficiency measures and on-site renewable energy generation in accordance with Policies G1, C1, CC1, CC2 and CC4 of the London Borough of Camden Local Plan 2017.

2.0 Reasons to Amend Condition 5

During RIBA Plan of Work Stage 3 design development the cooling hierarchy set out in the London Plan Policy SI4 Managing Heat Risk has been assessed.

> **Policy SI 4 Managing heat risk**
>
> A Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
>
> B Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:
>
> 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure
> 2) minimise internal heat generation through energy efficient design
> 3) manage the heat within the building through exposed internal thermal mass and high ceilings
> 4) provide passive ventilation
> 5) provide mechanical ventilation
> 6) provide active cooling systems.

The findings are presented below, and it is recognised the proposals have been developed with consideration given to the Historic England Document: Adapting Historic Buildings for Energy and Carbon Efficiency.

1) *reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure.*

   The property is an existing Grade II listed building with a fixed orientation and fenestration design.

Thermal insulation is being added to the roofs to meet current Building Regulations standards and to improve thermal performance and reduce heat gain.

Furthermore, secondary glazing will be added to all windows to improve the thermal performance of the building and to mitigate solar gains and overheating in summer.

Consideration has been given to the inclusion of external awnings and shades to further reduce solar gains, however this approach has not been deemed appropriate given the historic nature of the building.

2) *minimise internal heat generation through energy efficient design:*

Although the Grade II listed status means the fabric of the building can't be altered, the mechanical, electrical and public health services design shall incorporate low energy LED lighting and enhanced levels of heating and domestic hot water pipework insulation to limit heat generation.

3) *manage the heat within the building through exposed internal thermal mass and high ceilings:*

The building is Grade II listed and the fabric of the building can't be altered.

4) *provide passive ventilation:*

Introduction

A thermal modelling exercise has been undertaken to ensure the habitable rooms within the residential portion of the development will not overheat with a 'purely naturally ventilated scenario' however, thermal modelling has indicated thermal comfort will not be achieved and the property will significantly overheat.

The following guidelines have been followed to assess the proposed development:

i) CIBSE TM59 – Design methodology for the assessment of overheating risk in homes.

ii) Approved Document Part O of the Building Regulations.

Modelling Philosophy

CIBSE TM59 is a standardised approach to predicting overheating risk for residential building using dynamic thermal analysis. It provides a set of profiles that represent reasonable usage patterns for a home suitable for evaluating overheating risk. Where possible the magnitude of gains is taken from CIBSE guidance. Profiles are developed to test the building design, not to cover all usage modes.

The Requirements of Part O1 Overheating mitigation are to (a) limit unwanted solar gains in summer; (b) provide an adequate means to remove heat from the indoor environment.

Calculations have been performed based on the assumptions contained within the report with regard to lighting, occupancy, building operation, construction thermal properties and windows openings.

A dynamic thermal model has been constructed using the government accredited EDSL TAS version 9.5.4 software package and is fully compliant with CIBSE AM11 Building Performance Modelling and CIBSE TM59 modelling.

The thermal comfort category has been based on Category II assuming the occupants will be in good health and not vulnerable.

Weather Data and Climate Change

Modelling conventions (CIBSE SBEM Weather Lookup) dictate the post code should use the London weather centre weather file. In accordance with CIBSE TM59, future DSY 2020 weather files have been used for modelling simulations to ensure the building is modelled with consideration to future climate change.

CIBSE TM59 stipulates the weather file used for the methodology should be DSY1 (design summer year) file most appropriate for the site location for the 2020's, high emission, 50% percentile scenario.

Fabric

The existing building fabric has been assessed to have the following U-Values.

Construction	**U-Value (W/m^2.k)**
Existing external walls	2.14
Existing basement floor	2.14
Existing windows with new secondary glazing	3.3
New external wall	0.18
New roof	0.15
New windows	1.4
New roof lights	1.6

Window and Roof Light Operation & Ventilation

The existing sash windows have been modelled to open 50% when the adjustable pane is extended to the fully open position.

All new roof lights have been modelled to open.

Windows have been designed to open in accordance with the below requirement:

a) When a room is occupied during the day (8am to 11pm), openings should be modelled to do all of the following.

   i) Start to open when the internal temperature exceeds 22°C.
   ii) Be fully open when the internal temperature exceeds 26°C.
   iii) Start to close when the internal temperature falls below 26°C.
   iv) Be fully closed when the internal temperature falls below 22°C.

b) At night (11pm to 8am), openings should be modelled as fully open if both of the following apply.

   i) The opening is on the first floor or above and not easily accessible.
   ii) The internal temperature exceeds 23°C at 11pm.

Results

Based upon the modelling exercise set out above the building significantly overheats in summer.

Refer to Appendix 1 for the software CIBSE TM59 modelling results.

5) *provide mechanical ventilation:*

Introduction

A thermal modelling exercise has been undertaken to ensure the habitable rooms within the residential portion of the development will not overheat with a mechanical ventilated scenario. The philosophy for natural ventilation has been repeated with a mechanical ventilation air change rate of 6ac/hr in each room replacing the natural ventilation provided by opening windows.

Results

Based upon the modelling exercise set out above the building significantly overheats in summer.

Refer to Appendix 2 for CIBSE TM59 modelling results.

6) *provide active cooling systems:*

To ensure the dwelling will not overheat a VRF cooling system comprising of internal fan coil units connected to an externally mounted heat rejection condensing unit via a network of small bore refrigerant pipework will provide a means of mechanical cooling to ensure each habitable space is designed to the following design parameters:

External Design Conditions	30ºC db/20ºC wb
Internal Design Conditions	24ºC

Internal temperatures are dry resultant/operative with a +/- 2ºC control tolerance.

The small bore refrigerant pipework to be routed around the property will ensure the impact on the Grade II listed property will be minimal and the equipment shall be designed and installed to have a minimum Seasonal Energy Efficiency Ratio (SEER) of 5.8 to ensure the most efficient means of mechanical cooling is being introduced to the property.

Appendices

Appendix 1

CIBSE TM59 Thermal Comfort Overheating Modelling Results with Natural Ventilation

Domestic Overheating (CIBSE TM59)

Project Details

Building Designer File (.tbd): 4536 - 8 Guildford Street_London_LWC_DSY1_2020High50.tbd
Simulation Results File (.tsd): 4536 - 8 Guildford Street_London_LWC_DSY1_2020High50.tsd
Date: 25 April 2024
Building Category: Category II

Natural Ventilation Overheating Results

Zone Name	Room Use	Occupied Summer Hours	Max. Exceedable Hours	Criterion 1: #Hours Exceeding Comfort Range	Annual Night Occupied Hours for Bedroom	Max Exceedable Night Hours	Criterion 2: Number of Night Hours Exceeding 26 °C for Bedrooms.	Result
Dwell_DomBath 1	Other	0	0	0	N/A	N/A	N/A	Pass
Dwell_DomBath 2	Other	0	0	0	N/A	N/A	N/A	Pass
Dwell_DomBath 3	Other	0	0	0	N/A	N/A	N/A	Pass
Dwell_DomBed 1	Bedroom	3672	110	0	3285	32	56	Fail
Dwell_DomBed 2	Bedroom	3672	110	54	3285	32	45	Fail
Dwell_DomBed 3	Bedroom	3672	110	76	3285	32	39	Fail
Dwell_DomCirculation 1	Other	0	0	0	N/A	N/A	N/A	Pass
Dwell_DomCirculation 2	Other	0	0	0	N/A	N/A	N/A	Pass
Dwell_DomCirculation 3	Other	0	0	0	N/A	N/A	N/A	Pass
Dwell_DomCirculation 4	Other	0	0	0	N/A	N/A	N/A	Pass
Dwell_DomCommonAreas 1	Other	0	0	0	N/A	N/A	N/A	Pass
Dwell_DomDining 1	Living Room / Kitchen	1989	59	69	N/A	N/A	N/A	Fail
Dwell_DomKitchen 1	Living Room / Kitchen	1989	59	47	N/A	N/A	N/A	Pass
Dwell_DomLounge 1	Living Room / Kitchen	1989	59	35	N/A	N/A	N/A	Pass
Dwell_DomToilet 1	Other	0	0	0	N/A	N/A	N/A	Pass

*Zone names that have an orange coloured font are bedrooms which do not have 24/7 365 days a year occupancy, as per the TM59 guidance.

Appendix 2

CIBSE TM59 Thermal Comfort Overheating Modelling Results with Mechanical Ventilation

Domestic Overheating (CIBSE TM59)

Project Details

Building Designer File (.tbd): 4536 - 8 Guildford Street - Mech Vent_London_LWC_DSY1_2020High50.tbd
Simulation Results File (.tsd): 4536 - 8 Guildford Street - Mech Vent_London_LWC_DSY1_2020High50.tsd
Date: 25 April 2024
Building Category: Category II

Domestic Overheating (CIBSE TM59)

Mechanical Ventilation Overheating Results

Zone Name	Room Use	Annual Occupied Hours	Max. Exceedable Hours	Criterion 1: Number of Hours Exceeding 26 °C	Result
Dwell_DomBath 1	Other	0	0	0	Pass
Dwell_DomBath 2	Other	0	0	0	Pass
Dwell_DomBath 3	Other	0	0	0	Pass
Dwell_DomBed 1	Bedroom	8760	262	101	Pass
Dwell_DomBed 2	Bedroom	8760	262	560	Fail
Dwell_DomBed 3	Bedroom	8760	262	735	Fail
Dwell_DomCirculation 1	Other	0	0	0	Pass
Dwell_DomCirculation 2	Other	0	0	0	Pass
Dwell_DomCirculation 3	Other	0	0	0	Pass
Dwell_DomCirculation 4	Other	0	0	0	Pass
Dwell_DomCommonAreas 1	Other	0	0	0	Pass
Dwell_DomDining 1	Living Room / Kitchen	4745	142	451	Fail
Dwell_DomKitchen 1	Living Room / Kitchen	4745	142	400	Fail
Dwell_DomLounge 1	Living Room / Kitchen	4745	142	342	Fail
Dwell_DomToilet 1	Other	0	0	0	Pass

*Zone names that have an orange coloured font are bedrooms which do not have 24/7 365 days a year occupancy, as per the TM59 guidance.

Appendix 3

Quinn Ross Planning Stage Report P2787-SUS-01 Rev1 dated 28/11/2023

SUSTAINABILITY STATEMENT

PROJECT:
8 Guilford Street, Camden, London

PROJECT NUMBER:
P2787

DOCUMENT REF:
P2787-SUS-01

Revision	Date	Details	Authored	Checked
R1	28.11.2023	Issued for comment	J. Seager	C. Armstrong

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CONTENTS

1.0 INTRODUCTION

QuinnRoss Consultants was commissioned to develop a sustainability statement for the proposed *8 Guilford Street*. This will encompass an internal refurbishment of an office building and part conversion to a single dwelling. The dwelling will have an extension towards the rear. This report will demonstrate how it will provide heating and power and meet the energy and carbon emission targets set by national, regional, and local policy. The site is in the London Borough of Camden, in the Bloomsbury Conservation Area and is Grade II Listed.

This document will outline how the development has been designed with sustainability considerations being a key driver and the project team has fully considered all sustainability issues throughout the design and construction process to maximise the inclusion of these features and practices wherever possible. This approach will help to mitigate the impact of the development on both the local and wider environment.

Figure 01: Image of the property

2.0 PLANNING POLICY AND LEGISLATION

This section describes the planning policies and regulations that will affect the proposed development's sustainable credentials. In addition to these policies, due to the property being Grade II Listed, the developers are currently applying for Listed Building Consent with Historic England. The relevant planning policies are outlined below:

- Building Regulations Part L1 2021, volume 1 dwellings.
- Building Regulations Part L2 2021, volume 2 buildings other than dwellings.
- London Plan 2021.
- Camden Local Plan 2017.
- Camden Planning Guidance (CPG): Energy efficiency and adaptation 2021.

Policy	Description / Summary
Building Regulations Part L1 2021	
Regulation 28	Existing dwellings undergoing refurbishment should have consequential improvements made to improve its energy efficiency.

Table 01: Part L1 2021 policies

Policy	Description / Summary
Building Regulations Part ADL2 2021	
Regulation 28	Existing commercial buildings undergoing refurbishment should have consequential improvements made to improve its energy efficiency.

Table 02: Part L2 2021 policies

Policy	Description / Summary
London Plan 2021	
SI1, Improving air quality	Developments should use design solutions to prevent or minimise air pollution and aim to be air quality neutral.
SI4, Managing heat risk	Developments must incorporate methods of reducing the effect it will have on the urban heat island.
SI5, Water infrastructure	Water supplies must be conserved and BREEAM Wat 01 excellent standard achieved.
SI7, reducing waste & supporting circular economy	Developments should improve resource efficiency, minimise waste, avoid waste to landfill and recycle site waste.
SI8, Waste capacity and net waste self-sufficiency	Developments should provide a waste management plan that will ensure that any waste created will be kept within London and will make best use of existing waste sites.
SI12, Flood risk management	Development must comply with flood risk assessment requirements.
SI3, Sustainable drainage	Development proposals should aim to achieve greenfield run-off rates

	and ensure that surface water run-off is managed as close to its source as possible.
T1, Strategic approach to transport	All development should make use and encourage existing and future public transport, walking and cycling routes, and ensure that any impacts on London's transport networks are mitigated.
T2, Healthy Streets	The development should encourage walking, cycling, and using public transport.
T4, Assessing & mitigating transport impacts	Transport assessments should be submitted with development proposals.
T7, Deliveries, servicing, and construction	The transportation of the required building materials should be done as sustainable as possible.
DF1, Delivery of the Plan and Planning Obligations	Developments should endeavour to incorporate as many of the policies from both the London Plan and Local Development Plan policies.

Table 03: London Plan 2021 policies

Policy	Description / Summary
Camden Local Plan 2017	
Policy H3 Protecting existing homes	Existing residential spaces will be protected during a development. This includes making sure that their floorspace is not reduced and preventing homes from becoming short-stay accommodation.
Policy H5 Protecting and improving affordable housing	Affordable homes of various sizes and types will be protected from future developments.
Policy A1 Managing the impact of development	Permission will not be granted to developments if they harm any amenities to existing properties.
Policy A4 Noise and vibration	Developments must ensure that noise levels are managed to an appropriate level.
Policy A5 Basements	Developments that include their basements must demonstrate that it won't harm neighbouring properties, influence local amenities, or ruin the building's architectural character.
Policy D1 Design	The Council will ensure that developments are of a high-quality design, promoting sustainable practices and providing opportunities to develop a green infrastructure.
Policy D2 Heritage	Buildings that contribute to the history and heritage of Camden, including listed buildings, will be preserved and potentially enhanced.
Policy CC1 Climate change mitigation	It is necessary for all developments to implement energy efficiency methods to reduce carbon emissions, such as the London Plan energy hierarchy.
Policy CC2 Adapting to climate change	All developments must include appropriate climate change adaptation measures, which include preserving existing green

	spaces, not increasing surface water run-off, and finding methods to reduce dwelling overheating.
Policy CC3 Water and flooding	Developments must make sure that the risk of flooding will not increase, as well as making sure that water quality does not diminish
Policy CC4 Air Quality	Developments must ensure that air quality is maintained, and the poor air quality is mitigated across the borough.
Policy CC5 Waste	The Council aims to become a low waste borough, meeting the London Plan of having at least 50% of household waste being recycled.
Policy T1 Prioritising walking, cycling and public transport	To encourage sustainable transport, developments should promote walking, cycling and public transport wherever it can.

Table 04: London Borough of Camden Local Plan policies

Policy	Description / Summary
Camden Planning Guidance (CPG): Energy efficiency and adaptation 2021.	
Table 2a	Domestic refurbishment should meet the greatest possible reduction meeting Part L1B for retained thermal.
	Domestic refurbishment should incorporate renewables where possible.
Table 2b	Non-domestic refurbishment should meet the greatest possible reduction meeting Part L1B for retained thermal.
	Non-domestic refurbishment should incorporate renewables where possible.

Table 05: Camden Planning Guidance: Energy efficiency and adaptation 2021 policies

3.0 ENERGY

This development will undergo full refurbishment of existing outdated HVAC and lighting systems by having the latest most highly efficient heat pump heating and cooling with zoned temperature control and energy efficient Low Energy Lighting (L.E.L.) throughout. The low and zero carbon technologies chosen are based on site constraints, not design or cost constraints, which will also limit how much CO_2 can be reduced.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
Regulation 28	Regulation 28	SI2	Policy D1	Table 2a
		SI3	Policy CC1	Table 2b
			Policy CC2	

Table 04: Energy planning policies satisfied.

Please note that the building is grade II listed and elemental changes that could alter its historical status, such as building fabric upgrades or glazing replacement, would not be supported by the London Borough of Camden.

Please also note solar panels were considered however existing roofs will almost certainly not have the structural integrity to house the panels and any new roofs will be very small and sloped to match the surrounding architecture, making them more visible from pavement thus harming the appearance of the heritage asset

4.0 WATER

The potable water consumption of the building will be reduced through the specification of low water consuming fittings and water efficient appliances. The target water consumption for the development is less than 110 litres/person/day and will aim to achieve BREEAM standards for water conservation.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
		SI5	Policy CC3	

Table 05: Water conservation planning policies satisfied.

5.0 MATERIALS

Building materials have been considered to maximise the selection of materials with low embodied energy that score highly in the BRE Green Guide for Building Specification. It is anticipated most of the materials will achieve an A+ and A rating due to the form of lightweight construction and the new windows shall score an A-D rating.

The contractor shall be required to responsibly source all construction materials, in particular timber-based products, and this will be included in the Employers Requirements.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
		SI7	Policy D1	

Table 06: Material use planning policies satisfied.

6.0 SURFACE WATER

The site topographical levels demonstrate that the site is in Thames flood zone 1, indicating a 1 in 1000-year flood level risk, therefore flooding is predicted to not be an issue.

As the site is currently 100% buildings and hard standing, the proposed development will not increase the rate of run-off or volume of water from the site. The rainwater will have appropriate treatment to ensure the first 5mm of rainfall will not discharge direct into the watercourses.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
		SI12	Policy CC3	
		SI13		

Table 07: Surface water planning policies satisfied.

7.0 WASTE

Camden Council provide black bins for general rubbish and green bins for collecting recycling that is a weekly scheme and the following can be collected:

- Paper – newspaper, telephone directories, envelopes, and office paper
- Plastic – pots, tubs, cartons, and carrier bags
- Metal – tins, cans, foil, and aerosols
- Cardboard – plain, corrugated, and cereal boxes
- Glass – bottles and jars

Therefore, the building will have several large blue and black bins provided with appropriate labelling.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
		SI7	Policy CC5	

Table 08: Waste planning policies satisfied.

8.0 POLLUTION

To reduce the amount of greenhouse gas emissions associated with the development, all insulation used in the building fabric and services shall have a Global Warming Potential (GWP) less than 5 and all conditioning equipment (heating and cooling) will be fuelled by air source: heat pumps with zero NOx emissions.

The development will also consider the impact of noise pollution and intends to comply with national policy requirements by installing nearly silent running equipment externally.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
		SI1	Policy CC4	
			Policy A4	

Table 09: Pollution planning policies satisfied.

9.0 MANAGEMENT

A simple non-technical Building User Guide (BUG) will be produced providing information on the energy efficient design of the development, how to operate the services and equipment in and provide important information about the remainder of the site and its surroundings.

The contractor shall be required to register with the Considerate Constructors Scheme (CCS) and achieve a Beyond Best Practice score more than 40. They shall also be required to set targets, monitor, and report on their site energy consumption & associated CO_2 emissions, water consumption, adopt best practice policies for air and water pollution and responsibly source all site timber.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
		SI7	Policy A1	
		SI8	Policy A4	
			Policy A5	

Table 10: Management planning policies satisfied.

10.0 ECOLOGY

The site is currently lower ground floor plus four storeys of office building; therefore, the land is of low ecological value. Post-development the site will be near identical therefore the ecological value of the site will remain neutral.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
		SI4	Policy A2	
		G5	Policy A3	

Table 11: Ecology planning policies satisfied.

11.0 TRAVEL & TRANSPORTATION

The site is located within walking distance to several underground stations, as well as St Pancras International and King's Cross stations.

Other than street parking no additional parking spaces will be provided therefore discouraging personal car travel.

A site wide Travel Plan will also be developed which will be available to all building users.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
		T1	Policy T1	
		T2	Policy T4	
		T4		
		T7		

Table 12: Travel & Transportation planning policies satisfied.

12.0 METERING

Extensive metering and monitoring devices will be installed on site. Separate energy sub metering will be installed to cover the space heating & cooling, domestic hot water, small power and lighting, The meters will have a pulsed output to enable connection to an energy monitoring system and a mains water meter will also be specified on each supply in line.

Although no planning policies outline metering requirements specifically, the above will form part of compliance with energy, water conservation and information sharing policies.

13.0 LOCAL ENERGY GENERATION

The use of local District Heating (DH) networks is often encouraged in local planning policy, especially for properties in London. The nearest proposed and existing DH networks are over 1.0 and 1.2 km away respectively. Such distances would require significant pipe work, excavation and disruption to local road and transport networks which is extreme for this development especially as it would likely offer little energy and CO_2 reduction. It is therefore not considered.

14.0 OVERHEATING

The commercial area will be cooled via a new highly efficient VRF air source heat pump system therefore overheating will not be an issue.

The residential area will have openable windows for a purely naturally ventilated scenario and cooling will be avoided as per the cooling hierarchy.

Planning Policies Satisfied				
Part L1 2021	Part L2 2021	London Plan 2021	Camden Local Plan 2017	CPG: Energy efficiency and adaptation 2021
		SI4		

Table 13: Overheating adaptation planning policies satisfied.

15.0 CONSTRUCTION MANAGEMENT

The site processes will be implemented once a contractor is appointed:

- The contractor achieving a high standard CCS standard for its site (as outlined above).
- At least 95% of site waste will be diverted from landfill.
- An air quality plan for the site works will be developed.

16.0 CONCLUSION

When analysing all sustainability measures this development will likely cause little to no impact on the local area and environment. It will also comply with all national and local planning policies applicable to the site, reducing CO_2 emissions and contributing to the neighbourhood.