

CAMDEN GOODS YARD

15112-WAT-XX-XX-RP-V-59007 Sustainability Statement

March 2025





Camden Goods Yard

Sustainability Statement Stage 2 15112-WAT-XX-XX-RP-V-59007

March 2025

Waterman Building Services Ltd

Pickfords Wharf, Clink Street, London SE1 9DG www.watermangroup.com



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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)

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Comments

P01	Draft issue for comment	
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P03	Draft issue for comment	
C01	Final issue following comments	
C02	Updated final issue following comments	
C03	Updated text to Condition 73, final report for planning	

Revis	ion	Status	
P <i>nn</i>	Preliminary (shared; non-contractual)	S1	Coordination
Cnn	Contractual	S2	Information
		S3	Review & Comment
		S4	Review & Authorise
		S5	Review & Acceptance
		A0, A1, A <i>n</i>	Authorised & Accepted (n=work stage if applicable)

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

This document has been prepared by Waterman Building Services Ltd on behalf of St George West London Limited ('the Applicant'), to assess the sustainability of the Proposed Development varying the extant planning permission for the Camden Goods Yard project. The Planning Statement provides the full description of development proposal.

This s73 application comprises the proposed amendments in respect of Blocks C, D, E1, E2 and F of the Main Site parcel, within CGY, identified in the detail within the accompanying DAS Addendum and identified here for ease of reference:

The following conditions attached to the Operative Permission control development and are the subject of this S73 Application:-

- Condition 3, 4 and 6 approved drawings and documents these contains drawings which identify affordable homes (references amended) and new drawings are submitted to comply with fire regulations including a second stair core introduced into Blocks C, E1 and F and associated changes.
- Condition 5 contains drawings which identify affordable homes (references amended). The condition also refers to the 'affordable housing statement (June 2017)' which is amended.
- Condition 73 refers to '203 affordable' homes. This will be revised to '83 affordable homes'. The condition also
 refers to a total of 27,983sqm GEA of non-residential floorspace. This is revised to 28,792sqm, a de minimis
 increase of 809sqm following re-measurement of the scheme and marginal building footprint increase to
 building E1. We also note that the 2,769 sqm GEA of ancillary floorspace (gym, concierge, plant room, parking
 and energy centre) previously referred to in condition 73 (2020/3116/P, dated 3rd December 2020) has
 unintentionally been omitted from the Operative Permission and is proposed for reinserted.

This document describes the approach the design team has taken to integrate sustainability into the design process. The purpose of this report is to assess the extent of which the Proposed Development accords with the principles of sustainable development and the relevant planning policy requirements.

The project team for the Proposed Development is comprised as follows:

Table 1: Project Team	
Project team	Representative
Applicant	St George West London Limited
Planning Consultant	Quod
Architects	Allies & Morrison
Heritage Consultant	Turley Heritage
Sustainability Consultant	Waterman
Energy Consultant	Waterman
Circular Economy Consultant	Waterman
Whole Life Carbon Consultant	Waterman
Design & Access statement	David Bonnett Associates
Air Quality Consultant	Ardent
Noise Consultant	Ardent
Transport Consultant	Ardent

1.1 Site Context

The Proposed Development is located within the Main Site parcel of the Camden Goods Yard site at Chalk Farm Road, London NW1 8EH, covering approximately 3.264 ha. The Main Site parcel has basement works completed, with Blocks A and B set for completion in 2025 and 2026, while Blocks C, D, E1, E2, and F – forming part of the Proposed Development are yet to commence. The PFS Site saw Phase 1a deliver a Morrisons Temporary Store in 2021, replacing the former petrol station. Phase 1b, an office block, will begin after the new Morrisons store opens in late 2026.

The Site has good transport accessibility (PTAL 3 – 6a) and falls partially within the Regent's Canal Conservation Area and a Protected Viewing Corridor. Nearby heritage assets include the Roundhouse, Kent House, and Camden Incline Winding Engine House, with adjacent Conservation Areas in Harmood Street, Camden Town, and Primrose Hill.

The redevelopment will deliver new homes, commercial spaces, and public realm improvements, integrating with the Site's historic and environmental setting.



2. Planning Policies

2.1 National Planning Policies and Legislation

National Planning Policy Framework (NPPF) 2.1.1

The National Planning Policy Framework (NPPF) was last revised in 2024. 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 Regional Policies

The London Plan, the Spatial Development Strategy for London (2021) 2.2.1

"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:

Good Growth

Policy GG6 Increasing Efficiency and Resilience

Design

- Policy D7 Public Realm
- Policy D8 Tall Buildings
- Policy D12 Agent of Change
- Policy D13 Noise
- Policy D14 Noise

Housing

Policy H5 Delivering Affordable Housing

Heritage and Culture

Policy HC1 Heritage Conservation and Growth

Green Infrastructure and Natural Environment

- Policy G1 Green Infrastructure
- Policy G5 Urban Greening
- Policy G6 Biodiversity and Access to Nature
- Policy G7 Trees and Woodlands •
- Policy G9 Geodiversity

Sustainable Infrastructure

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 SI15 Water Transport
- Policy SI17 Reducing Waste and Supporting the Circular Economy
- Policy SI18 Waste Capacity and Net Waste Self Sufficiency

Transport

- Policy T1 Strategic Approach to Transport
- Policy T2 Healthy Streets
- Policy T4 Assessing and Mitigating Transport Impacts
- Policy T5 Cycling
- Policy T6 Car Parking

2.2.2 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.

2.3 Local Planning Policies

2.3.1 Local Plan, London Borough of Camden (2017)

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

- 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

A1 - Managing the Impact of Development

New developments must be designed to minimise adverse impacts on the local environment and community. Measures should be in place to mitigate noise, dust, and pollution during construction and operation. Developers may be required to submit Construction and Environmental Management Plans to ensure sustainable and responsible building practices.

A3 - Biodiversity

Development proposals should protect, enhance, and create opportunities for biodiversity. Green infrastructure, such as green roofs, living walls, and wildlife-friendly landscaping, should be incorporated to support Camden's ecological network. Proposals affecting designated sites or priority habitats must demonstrate how biodiversity will be preserved and improved.

A4 - Noise and Vibration

Proposals must limit noise, and vibration impacts to protect the health and well-being of Camden's residents. Noise-sensitive developments should be designed to minimise exposure to excessive noise, and mitigation measures such as sound insulation and site layout adjustments should be incorporated where necessary. Noise Impact Assessments may be required for major developments.

T1 – Prioritising Walking, Cycling, and Public Transport

Developments must prioritise sustainable transport by promoting walking, cycling, and public transport access. Proposals should provide high-quality pedestrian routes, safe cycle infrastructure, and secure cycle storage to encourage active travel. Car-free developments will be supported in areas with good public transport accessibility.

2.3.2 Draft Camden New Local Plan 2024

The Camden New Local Plan 2024 sets out policies to help achieve the borough's climate goals, focusing on energy efficiency, sustainability, and carbon reduction. These policies aim to ensure that both new developments and existing buildings contribute to a net-zero carbon future, while improving resilience to climate change and protecting Camden's unique character. The following policies from the local plan relate to sustainability.

- CC3: Circular Economy and Reduction of Waste
- CC4: Minimising Carbon emissions
- CC5: Energy reduction in Existing buildings

- CC8: Overheating and cooling
- CC9: Water Efficiency
- CC10: Sustainable Design and Construction Certification
- NE2: Biodiversity
- NE4: Water Quality
- D5: Heritage
- A3: Air Quality
- A4: Noise and vibration
- T1: Safe, Healthy and Sustainable Transport
- T3: Public Transport

CC3 - Circular Economy and Reduction of Waste

This policy promotes the efficient use of resources by encouraging material reuse, recycling, and waste reduction in all developments. A Circular Economy Statement must be submitted, outlining how materials will be sourced sustainably, reused where possible, and diverted from landfill. Developments should also incorporate adaptable and flexible design to extend building lifespans and minimise demolition waste.

CC10 - Sustainable Design and Construction Certification

All major developments must meet high sustainability standards and obtain certification under recognised schemes such as BREEAM or Passivhaus. Sustainable construction methods, including the use of low-carbon materials and circular economy principles, should be prioritised. Developers must submit a Sustainability Statement demonstrating compliance with energy, water, and resource efficiency targets.

D5 – Heritage

Camden's rich heritage and historic character will be preserved and enhanced through sensitive development. Proposals affecting listed buildings, conservation areas, or locally significant heritage assets must demonstrate a clear understanding of the Site's historic context and contribute positively to the area's character. Any alterations or new developments should use high-quality materials and design approaches that respect the architectural and cultural significance of their surroundings. A Heritage Impact Assessment may be required to ensure heritage assets are protected.

A3 – Air Quality

New developments must minimise air pollution and contribute to improving local air quality. Air Quality Assessments are required for major developments to demonstrate compliance with national and local air quality standards. Measures such as low-emission heating systems, green infrastructure (e.g., tree planting and green walls), and restrictions on idling vehicles will be encouraged. Developments must also avoid introducing new sensitive receptors, such as schools or residential units, in areas with poor air quality unless adequate mitigation measures are in place.

A4 – Noise and Vibration

Developments must be designed to minimise noise pollution and vibration impacts on surrounding areas. Noisesensitive uses, such as residential buildings, schools, and hospitals, must be protected from excessive noise



through appropriate site layout, sound insulation, and mitigation measures. Major developments may be required to submit a Noise Impact Assessment, and construction works should adhere to best practice guidelines to limit disruption to residents and businesses.

T1 – Safe, Healthy and Sustainable Transport

New developments must promote active and sustainable modes of transport, such as walking, cycling, and public transport, while reducing reliance on private cars. Car-free developments will be prioritised, except where essential for accessibility needs. Secure cycle parking, improved pedestrian routes, and the provision of electric vehicle (EV) charging infrastructure must be integrated into new proposals. Developments should also contribute to public realm improvements, enhancing street safety, accessibility, and connectivity to promote healthier travel choices.

2.3.3 Camden Supporting Planning Documents

The following supplementary planning guidance relating to sustainable design has been considered:

- Air Quality (January 2021)
- Amenity (January 2021)
- Design (January 2021)
- Energy efficiency and adaptation (January 2021)
- Planning for Health and Wellbeing (January 2021)
- Transport (January 2021)
- Water and Flooding (March 2019)



3. Sustainability Review

The Proposed Development is committed to delivering positive changes as part of the design and construction process with sustainability considered a key focus area from the outset.

The following sustainability themes for the Proposed Development have been identified:

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

Enoray

Heritage.

Table 2.

3.1 Energy

The Energy Assessment produced by Waterman Building Services Ltd, 15112-WAT-XX-XX-RP-V-59004 CGY Energy Statement, accompanies the planning application for the Proposed Development.

The following is in relation to the domestic SAPs and commercial spaces:

Table Z. Ellergy	
Relevant applicable polic	vies
Camden Local Plan (2017)	Policy CC1 Mitigating Climate ChangePolicy CC2 Adapting to Climate Change
Draft Camden Local Plan (2024)	 CC6 – Energy reduction in new buildings CC7 – Heat networks CC8 – Overheating and cooling
London Plan (2021)	 Policy SI2 Minimising Greenhouse Gas Emissions Policy SI3 Energy Infrastructure Policy SI4 Managing Heat Risk
Objectives, requirements	s, and targets

Promote Zero Carbon design

· Application of the cooling hierarchy to reduce overheating risk

Achieve a minimum on-site reduction of at least 35% beyond Building Regulations Part L

Generate at least 15% of energy needs from renewable energy

- The Council will ensure that all new buildings are designed and built to be net zero carbon in operation
- The Council will ensure that all major developments utilise energy from heat networks where feasible
- The Council will ensure that development is designed to minimise overheating and promote cooling

A minimum on-site reduction of at least 35% beyond Building Regulations is required for major development. Residential development should achieve 10%, and non-residential development should achieve 15% through energy efficiency measures.

The Energy Assessment produced by Waterman Building Services Ltd, 15112-WAT-XX-XX-RP-V-59004 CGY Energy Statement, that accompanies the planning application for the Proposed Development has taken a threestep 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 delivered by District Heating Networks (DHNs).

Be Green – Reduce the building's carbon dioxide emissions using renewable technologies.

Be Lean 3.1.1

"Be Lean" measures refer to passive design and energy efficient solutions. 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. The Proposed Development is seeking to maximise the potential of the measures by the strategy outlined in the following sections.

The baseline and proposed U-values can be found in Table 4.

Table 3: Fabric Perfor	Fabric Performance (new apartments and houses)		
Element	Notional Building Regulations Part L 2021	Proposed Measures	
Air Tightness	8.00 m ³ /hr/m ²	3.00 m ³ /hr/m ²	
External Wall	0.26 W/m²k	0.18 W/m²k	
Exposed Floor	0.18 W/m²k	0.12 W/m²k	
Roof	0.18 W/m²k	0.14 W/m²k	
Window	1.60 W/m²k	1.20 W/m²k	
Doors	1.60 W/m²k	1.20 W/m²k	
Glazing G-Value	N/A	0.45	

3.1.2 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 Site is not within 500m of any existing or proposed connection to low-carbon heat networks, as shown in Figure 9 and Table 6. The closest Energy Centre is 1.6km from the Site. It was agreed with LBC in 2020 the CGY project will not connect into a district heating network. This is because the strategy changed to ASHP-ed / all electric system as part of the approved Energy Strategy Addendum for the S73 planning permission.

The building has therefore been designed with a designated safeguarded space to facilitate connection to the heat network in the future. This shall be designed in such a way as to allow a single point of connection to any future DHN.

3.1.3 Be Green

In accordance with GLA Energy Assessment Guidance and London Plan Policy SI3, the low and zero carbon energy systems for the Site have been determined as follows:

- Heat pumps Air source heat pumps extract heat from the air and convert it to heat for space heating and hot
 water. Air source heat pumps are thought to be feasible for the project because they are generally more easily
 locatable than ground source heat pumps. In addition to space heating, air to water heat pumps will generate
 hot water at temperatures suitable for domestic hot water generation.
- Photovoltaic (PV) panels

Table 4: PV Capacity

Block	PV capacity (in kWp)
Block C	15.40
Block D	38.50
Block E	13.75
Block E2	26.95
Block F	16.00
Total	110.60

3.2 Materials

Та	ble 5:	Materials		
R	elevant a	applicable pol	icies	
Camden Local Plan (2017)		•	Policy D1 Design	
Draft Camden Local Plan (2024)		•	Policy D2 Tall Buildings	
		•	•	Policy D9 Tall Buildings
London I	ondon Pl	Plan (2021)	•	Policy SI7 Reducing Waste and S
				Policy SI 2 Minimising greenhous
Objectives, requirements and targets			targets	

20% recycled content by value

- Incorporate best practice in resource management and climate change adaptation and mitigation
- Materials should be high quality and complement the local character

The Proposed Development is committed to sustainable material selection and responsible sourcing to minimise environmental impact. As part of the BREEAM assessments being undertaken, six credits are targeted for MAT 01 in relation to the superstructure and one credit for the substructure, ensuring the use of materials with a low environmental impact over their life cycle.

For MAT 02, one credit is targeted for the specification of products with a recognised Environmental Product Declaration (EPD), demonstrating transparency in material sustainability.

Under MAT 03, the timber prerequisite will be met, ensuring all timber used is legally sourced and responsibly managed. Additionally, one credit is targeted for sustainable procurement, and two credits for responsible sourcing, ensuring construction materials are obtained in an environmentally and socially responsible manner.

For MAT 05, one credit is targeted to protect vulnerable parts of the building from damage and protect exposed parts of the building from material degradation, ensuring long-term durability and resilience of the development.

3.2.1 Circular Economy

Circular Economy has been at the forefront of design considerations since the earliest design stages and a Circular Economy Statement has been produced by Waterman Building Services Ltd as part of this planning application. Within the Circular Economy Guidance from the GLA, a decision tree is provided to highlight the various design approaches for existing structures. Figure 4 shows this decision tree, as well as highlights the design approach that was employed for this project.

This plan looked to minimise waste generation and maximise the reuse of existing materials. In the event that the latter was not possible, the resource management plan ensures materials are processed in line with the waste hierarchy, complying with waste legislation where waste generation is unavoidable.

Supporting the Circular Economy

se gas emissions

nge adaptation and mitigation r



Figure 1: Decision Tree for Design Approaches for Existing Buildings, with Agreed Pathway

Source: Greater London Authority. Available at: Circular Economy Statements (Iondon.gov.uk)



Six key principles have been identified within the GLA Guidance document:

- 1. Building in Layers
- 2. Designing Out Waste
- 3. Designing for Longevity
- 4. Designing for Adaptability or Flexibility
- 5. Designing for Disassembly
- 6. Using Systems, Elements, or Materials that can be Reused and Recycled

Building in Layers

Each layer of the building has been treated differently based on the inherent properties of the building elements contained within each layer and the opportunities and constraints associated. Table 6 outlines the strategy implemented for each building layer.

Table 6:	Strategy	by B	uilding	Layer	

Layer	CE Strategy	Narrative
Skin / Shell	Design for Longevity Design for Disassembly	 All building elements to be specified with long design lives in accordance with industry standards
		 Adequate waterproofing details to mitigate risk of water damage to structural elements and finishes.

		 Modular design whe strategies.
		Non-load bearing fac
Structure/ Frame	Design for Longevity Design for Adaptability	 All building elements with industry standard
		Adequate waterproo structural elements a
		 Specification of reinf particular will provide remedial maintenance
		Core location and sta
		Open floor space all
		 Reinforced concrete year lifespan (potent
		•
Building Services	Design for Replaceability Design for Adaptability	Accessible Building replacing / maintaining
		 Connected to a distr and reducing relianc
		 Incorporation of mec openable windows for
		Eliminates unnecess component-level rep
Space plan/ Interior	Design for Replaceability	 Layout that can easi
	Design for Flexibility Design for Disassembly	Bare finishes where materials
		 Mechanical connection
		Modular design whe
Stuff	Design for Replaceability Design for Flexibility	 High-quality kitchens and ease of mainten
	Design for Disassembly	 Modular installation requiring full-scale re
		 Minimisation of difference recycling potential.

•

end of life

Designing Out Waste

The project integrates the principles of the Circular Economy by applying the Waste Hierarchy to minimise landfill waste and maximize material reuse and recycling. Waste reduction measures are embedded from the design stage, ensuring long-term sustainability.

7 Camden Goods Yard Project Number: BSD15112 15112-WAT-XX-XX-RP-V-59007 · Materials selected that require limited maintenance

Precast façade considered for disassembly of the façade and reuse at the

ere possible to allow for repeatable disassembly

açade to allow for easier disassembly

ts to be specified with long design lives in accordance ards

ofing details to mitigate risk of water damage to and finishes.

nforced concrete for the main structural frame in de excellent durability and resilience with little need for nce

standardised structural grid allows for adaptability

llowing for more flexible change in use

e (RC) frame and piled foundations with a minimum 60ntially over 100 years with maintenance).

services to avoid damaging other systems when hing

trict-wide heating system, enhancing energy efficiency ce on fossil fuels.

echanical ventilation with heat recovery (MVHR) and for dual adaptability

ssary material waste by allowing modular and placements.

sily be adjusted to different use types.

e possible and avoidance of secondary finishes to

tions where possible

ere possible

ns, appliances, and sanitary ware selected for long life enance.

n methods enable component-level replacements without refurbishment.

erent material types to enhance disassembly and



1. Waste Hierarchy

The project follows the Waste Hierarchy, prioritising waste prevention, reuse, and recycling. Lean design principles will be applied to minimise waste generation throughout the construction and operational life cycle.

2. Construction Waste

Approximately 4,317 tonnes of construction waste is expected, with 87.3% recycled, 12.7% to be reused and 0.1% recovered, meeting the GLA's 95% diversion from landfill target. Waste diversion will be monitored throughout construction to maintain these goals.

3. Designing Out Waste

The project emphasises material reclamation and prefabrication to minimise waste, including:

- Reusing existing concrete slabs for piling mats.
- Integrating high-recycled content materials (e.g., aluminium windows, mineral wool insulation).
- Using prefabricated elements like kitchen units and bathroom pods to reduce on-site waste.

4. Lean Design Principles

Lean design will optimise structural efficiency and reduce material use, including:

- Post-tensioned slabs and recycled materials to reduce concrete and rebar.
- Prefabricated, high-recycled content materials for windows and doors.
- Modular partitions and ceilings to minimise waste.

5. Sustainable Sourcing

The project commits to sourcing materials responsibly, prioritising local suppliers, recycled content, and certified sustainable products. This includes FSC-certified timber, cement replacement in concrete, and recycled aggregates in the structural frame.

6. Operational Waste Management

Waste management will include designated areas for recycling, food waste, and residual waste, with a flexible strategy that aligns with council guidelines to ensure efficient waste collection and disposal.

Designing for Longevity

The Proposed Development prioritises longevity and durability to suit intensive retail use, aiming for a long life in line with industry standards. The reinforced concrete frame and piled foundations provide structural stability with a minimum 60-year lifespan, exceeding 100 years with proper maintenance. These durable materials and construction techniques minimise waste, maintenance, and embodied carbon.

The building connects to a district-wide heating system, enhancing energy efficiency and future proofing the development. Spaces are designed with adaptability in mind, allowing easy conversion of retail areas to residential units if needed. High-quality, durable materials are selected for long lifespan, easy maintenance, and future upgrades, reducing waste and supporting circular material flows.

All materials meet stringent durability standards, focusing on low-embodied carbon, recyclability, and modular construction for future disassembly and resource recovery. The development targets a BREEAM 'Excellent' rating, focusing on adaptability, energy performance, durability, climate resilience, and circular economy principles, with credits for design flexibility, disassembly, and material longevity.

Designing for Adaptability or Flexibility

The Proposed Development is designed for adaptability, ensuring spaces can evolve to meet changing needs. The reinforced concrete frame and piled foundations provide long-term stability, while minimising internal columns for flexible layouts. This supports future reconfigurations with minimal structural changes, promoting a low-waste, circular approach.

The facade features bolted connections for easy removal, replacement, or repair, allowing for updates without significant waste, aligning with circular economy principles. A mechanical ventilation system with heat recovery (MVHR) and openable windows offer adaptable ventilation, enhancing air quality and energy efficiency, and reducing the need for future retrofits.

The structural grid and layout maximise flexibility for various apartment types and access requirements, ensuring the development can respond to societal shifts with minimal material consumption. Internal fixtures and appliances are modular, allowing for easy upgrades, and M4(3) adaptable flats ensure accessibility for future users. The modular construction allows for future changes in use and design with minimal waste.

Designing for Disassembly

The next stages of design will focus on principles that facilitate disassembly and material recovery. Mechanical connections will be used instead of welded or chemical ones, especially for secondary steelwork, allowing for easier future disassembly. Alternative connection methods will be considered to ensure the most suitable options are chosen.

The brick facade system is designed for deconstruction and material recovery, enabling recycling into aggregate and minimizing waste. Similarly, precast elements will be used for the facade, offering flexibility for future adjustments or demountability.

Building services will include strategic access points for easy maintenance and upgrades, extending the life of systems and reducing waste. Modular metal stud partitions will be used internally to allow for easy reconfiguration and minimal material waste, supporting future adaptability.

The development will aim to standardise materials and layouts to simplify disassembly. Consistent carpentry will make it easier to remove and replace components, reducing waste. Additionally, a Building Adaptability and Disassembly Guide may be explored to outline components for reuse, recycling, or composting, ensuring sustainable management of materials over the building's lifecycle.

3.2.2 Whole Life Carbon

Whole Life Carbon assesses the carbon impact arising from regulated and unregulated energy, and water usage (collectively known as Operational Carbon), and materials-based carbon (also known as Embodied Carbon) over a study reference period of 60 years.

Benchmark	Module	GLA Benchmark (kgCO ₂ eq/m ²)	Results of the Proposed Development****	Benchmark Met?
Aspirational	Module A*	< 500	294	Met
	Module B-C**	< 300	185	Met
	Total***	< 800	434	Met
* Excluding Sequestered Carbon				
** Excluding B6 and B7				
*** Excluding B6 and B7; including Sequestered Carbon				
**** Proposed Development excludes elements of substructure already delivered				

I Buildings



The results of the assessment have been compared against the current and aspirational benchmarks, set by the GLA, for Residential Buildings. The results meet both the current and aspirational benchmarks for Module A, Modules B-C, and the total embodied carbon impact. It should be noted that the Basement and Piling under Buildings B, C, D, and E1 have been constructed from concrete, which has a high embodied carbon intensity. As these elements have already been constructed, they have been excluded from the assessment, and therefore a large portion of construction-based carbon has been omitted.

Optioneering 3.2.3

Measures already included in the Design

In accordance with the GLA WLCA guidance, it is important to acknowledge the measures already incorporated within the design, and quantify the improvement in embodied carbon. Table 21 evaluates these measures.

Analysis of measures already incorporated Table 8:

Description	Improvement
	kgCO2e/m2
Measure 1: CEM1 concrete in the frame	2
Measure 2: CEM1 concrete in the substructure	16
Measure 3: All FCU refrigerant pipes to be steel	1

Description of Further Options

In accordance with the GLA WLCA guidance, options to minimise the embodied carbon impact should be explored. These options should be discussed by the Design Team to determine the viability for inclusion at the next RIBA Stage. It is important to consider that the options proposed are not exhaustive and that other considerations may be explored to further reduce the embodied carbon impact.

Option Appraisal with Embodied Carbon Impact Table 9:

Description	Improvement
	kgCO2e/m2
Option 1: 40% low cement replacement in the frame	-4
Option 2: Specification of CELSA rebar (100% recycled content) throughout the superstructure	-15
Option 3: 40% low cement replacement in the substructure	-16
Option 4: Specification of CELSA rebar (100% recycled content) throughout the substructure	-13

Option 5: Substituting 60mm pavers for natural sandstone	
Option 6: Fully wet underfloor heating	-12

3.2.4 Commitments

Across the Circular Economy and Whole Life Carbon requirements, a series of design commitments and recommendations arise. These should be implemented throughout the design stage across all disciplines, as well as appointing a Main Contractor who aligns with the design team aspirations. The commitments and recommendations for the Proposed Development are as follows, and it is the intention that these will be included within the Main contractor requirements:

- A minimum average of 20% recycled content by value across all construction materials, achieved by:
 - Maximising recycled content of steel and aluminium
 - Maximising low carbon cement replacement
 - Exploring opportunities for reuse of existing materials
- All timber and timber-based products are to be FSC or PEFC certified, with a full chain of custody;
- Prioritising low embodied carbon materials;
- Materials with Environmental Product Declarations (EPDs) to be specified where possible;
- · Sourcing locally and sustainably, where possible;
- Implementing protective measures where required, e.g. kickplates on doors with high pedestrian use;
- A sustainable procurement plan will be provided on this project to encourage responsibly sourced and local procurement of materials.

3.3 Waste

Table 10: Waste Relevant applicable policies Camden Local Plan Policy CC5 Waste (2017)Draft Camden Local Plan

- · CC3 Circular economy and reduction of waste
- London Plan (2021)

(2024)

- Policy SI8 Waste Capacity and Net Waste Self Sufficiency

Objectives, requirements and targets

- · Reduce waste produced in the borough and increase recycling/reuse of materials to meet London Plan targets.
- Ensure developments include facilities for the storage and collection of waste and recycling.
- Meet or exceed the municipal waste recycling target of 65% by 2030

Policy SI7 Reducing Waste and Supporting the Circular Economy



- Meet or exceed the targets for each of the following waste and material streams:
 - Construction and demolition 95% reuse/recycling/recovery
 - Excavation 95% beneficial use
- The Council will seek to ensure that developments minimise waste, use resources efficiently, and are designed to facilitate easy maintenance and adaptability of use.

One-third of all waste in the UK is generated by the construction and demolition sector, which is the largest contributor of waste in the nation.

The adoption of circular economy principles outlined in the materials section above (See Section 3.2.1) during detailed design stage will ensure that waste is designed out as far as practicable. Additionally, the principal contractor (once appointed) will be expected to prepare a Site Waste Management Plan (SWMP) for the Site. This will include a target benchmark for resource efficiency and will outline procedures to minimise both hazardous and non-hazardous waste in accordance with the waste hierarchy (See Figure 2). The principal contractor will be expected to identify avenues to reduce waste arisings during construction such as:

- · Setting wastage rate targets for their subcontractors
- Identifying take-back schemes with suppliers
- · The use of "just-in time" delivery
- The use of dedicated material storage rooms.

3.3.1 Waste Hierarchy

The Waste Hierarchy was developed to provide guidance to Design Teams as to how to manage waste in a way to retain the maximum residual value. It places prevention at the top, i.e., how to stop waste from arising, before addressing ways in which to handle waste. Only once all other avenues of waste handling have been considered, should disposal to landfill be considered an option.

The Waste Hierarchy should be applied to all forms of waste, including Demolition, Construction, Operational, and Excavation, to align with the following targets as set out by the GLA:

- Demolition Waste: Minimum of 95% diversion from landfill
- Construction Waste: Minimum of 95% diversion from landfill
- Excavation Waste: Minimum of 95% diversion beneficial use
- Operational Waste: Minimum of 65% municipal waste recycling target by 2030 and 75% for business waste.



3.3.2 Construction Waste

Construction Waste estimated to arise is 3,615 tonnes, based on data from St George's current waste benchmarks. Of this, 98% is estimated to be recycled and a further 2% to be recovered depending on the degree of contamination etc. This therefore means the scheme estimated diversion of construction waste from landfill complies with the GLA's target of 95%. At the construction stage, the actual figures of construction waste should be monitored and recorded, including where the waste is sent, to confirm that the 95% diversion from landfill target is still being met.

Additional waste recovery and savings measures should be explored during the construction stage to further reduce the tonnes of construction waste that arises while simultaneously increasing the proportion of waste diverted from landfill.

3.3.3 Operational Waste

The Operational Waste generated for the residential homes has been estimated by KaNect. The Commercial units will have its own dedicated waste storage areas, with a consolidated collection points. Waste will be collected twice weekly, residential waste will utilise the following bins:

- 19 x 1,280L bins for recycling
- 12 x 240L bins for food waste and batteries
- 19 x 1,280L bins for residual waste.

Commercial waste will utilise the following bins:

- 5 x 1,100L bins for recycling
- 2 x 1,100L bins for residual waste
- 4 x 660L bins for food waste

Given the relatively low waste generation from commercial spaces, compaction is not recommended. The waste strategy aligns with council guidelines, ensuring accessibility for collection vehicles within 10m of the furthest bin, while minimising obstructions and optimising space allocations. Additionally, the strategy remains flexible for potential adjustments in consultation with the council to optimise bulky waste storage and enhance overall waste management efficiency.



3.3.4 Excavation Waste

Excavation waste is not applicable to this project as the building is already existing, and no significant groundworks or site excavations are required as part of the planning application.

3.4 Pollution and Nuisance

Table 11: Pollution and Nuisance		
Relevant applicable policies		
 Policy A1 Managing the Impact of Development Policy A4 Noise and Vibration Policy CC4 Air Quality 		
Draft Camden Local Plan (2024)	A3: Air QualityA4: Noise and vibration	
London Plan (2021)	 Policy D8 Public Realm Policy D13 Agent of Change Policy D14 Noise 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.
- Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts.
- · Propose remediation to deal with any identified land contamination
- Minimise the noise impact from deliveries and from the demolition and construction phases of development.
- · Ensure that artificial lighting causes minimal disturbance to occupiers and wildlife.
- · A noise assessment will be required where there may be an impact on noise-sensitive uses.
- The Council will expect development to contribute to improving air quality in Camden to protect public health.
- The Council will seek to ensure that noise and vibration is controlled and managed to avoid significant adverse impacts on health and quality of life.

3.4.1 Air Quality

Ardent Consulting Engineers produced an Air Quality Assessment (AQA), 2205801-R07, that accompanies the planning application. The Proposed Development adheres to London Plan Policy SI1 (Improving Air Quality) by meeting the air quality neutral criteria for both building and transport emissions. The air quality assessment (AQA)

confirms that the site's emissions for NO2, PM10, and PM2.5 are below the legal thresholds. This ensures that the development complies with the air quality neutral objectives and does not contribute to worsening local air quality. Additionally, since the development is located within an Air Quality Management Area (AQMA), it includes a positive air quality approach to further mitigate pollution impacts.

The Proposed Development also aligns with London Plan Policy A4 (Noise) by taking measures to prevent adverse effects from noise and vibration. The AQA specifies that all construction equipment will meet Non-Road Mobile Machinery (NRMM) emission standards, reducing potential noise and vibration during construction. The design of the site also ensures compliance with local noise thresholds, protecting surrounding residential areas from noise pollution.

In accordance with Camden Local Plan, the Proposed Development includes a comprehensive review of potential industrial emissions and contamination risks. The project incorporates necessary remediation measures to address any risks associated with contaminated land, ensuring the development's safety and environmental compliance. It also implements measures to minimise light spill and glare, protecting the residential amenity of nearby properties. The design also includes strategies to reduce the visual impact during both construction and operation.

The project complies with Camden Local Plan Policy CC4 by contributing positively to environmental improvements and the public realm. The AQA outlines the use of modern construction methods that reduce dust and emissions, minimizing environmental disruption throughout the construction phase.

The AQA emphasises the use of best practice mitigation measures during high-risk activities, such as demolition and construction. These include dust control and compliance with NRMM standards to limit both air and noise pollution. These measures ensure that the development aligns with both local and regional pollution and nuisance policies.

The Proposed Development is committed to incorporating good practice with regards to both internal and external air quality. As part of the BREEAM assessments being undertaken, the ventilation credit is targeted for HEA 02 Indoor Air Quality, this requires fresh air to be supplied in accordance with relevant national best practice standards. In addition, an Indoor Air Quality Plan will be produced to facilitate a process that leads to design, specification and installation decisions and actions that minimise indoor air pollution during occupation of the building. Two BREEAM credits are being targeted for POL 02 Local Air Quality, achieved through the implementation of the energy strategy, ensuring all heating and hot water is supplied by non-combustion systems.

3.4.2 Noise

A Noise and Vibration Addendum, *2105801-R05A*, that accompanies the planning application has been produced by Ardent Consulting Engineers. The report details the analysis of the environmental noise surveying at the site to establish the prevailing noise levels.

The report determined that the there will not be significant changes to noise and vibration levels from demolition and construction activities, or a significant change in noise levels associated with demolition and construction traffic flows. Therefore, the Proposed Development would not have a greater noise impact and as such the conclusions of the 2017 Environmental Statement (as amended) remain valid.

The Proposed Development is committed to incorporating good practice in acoustic performance to enhance occupant comfort. As part of the BREEAM assessments being undertaken, one credit is being targeted for HEA 05 Acoustic Performance. This requires compliance with relevant national standards to ensure appropriate internal noise levels and sound insulation. Acoustic design measures will be implemented to minimise noise disturbance from external sources and between different spaces within the development, contributing to a high-quality internal environment.



3.5 Water Consumption

Table 12: Water Consumption		
Relevant applicable pol	licies	
Camden Local Plan (2017) • Policy CC3 Water and Flooding		
Draft Camden Local Plan (2024)	CC9: Water EfficiencyNE4: Water Quality	
London Plan (2021)	Policy SI5 Water Infrastructure	
Objectives, requirements and targets		

- Incorporate water efficiency measures
- Expect developers to prevent discharges to ground through land affected by contamination.

The conservation and management of water resources is a key consideration in new developments, which should prioritise sustainable water use in line with the water hierarchy.

As the design progresses, the incorporation of water-efficient sanitary fixtures, such as low-flush WCs and lowflow taps and showers, will be explored to reduce potable water consumption. The scheme will also aim to achieve a minimum of three BREEAM credits related to water efficiency and management.

A Flood Risk Assessment and Drainage Strategy has previously been undertaken for the scheme. The proposed works included in the Proposed Development does not affect these, therefore the previous report is considered to still be applicable for this application.

3.6 Nature Conservation and Biodiversity

Table 13: Nature Conservation and Biodiversity

Relevant applicable policies		
Camden Local Plan	Policy A2 Open Space	
(2017)	Policy A3 Biodiversity	
Draft Camden Local Plan (2024)	NE2: Biodiversity	
	Policy G1 Green Infrastructure	
	Policy G5 Urban Greening	
London Plan (2021)	Policy G6 Biodiversity and Access to Nature	
	Policy G7 Trees and Woodlands	
	Policy G9 Geodiversity	
Objectives, requirements and targets		

- Apply a standard of 0.74 sqm of open space per occupant for commercial buildings.
- Protect and enhance biodiversity leading to a net gain to achieve an Urban Greening Factor (UGF) of 0.4
- Require the demolition and construction phases, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species
- Incorporate additional trees where possible
- Minimise the loss of trees and vegetation of significant amenity, historic, cultural or ecological value
- Safeguard protected and priority habitats and species, Sites of Importance for Nature Conservation (SINC) and other features of biodiversity value such as wildlife corridors and stepping stones
- Address the potential of both direct and indirect impacts on habitats and species, from factors such as shading, light pollution and risk of disturbance and expect development to follow the mitigation hierarchy with regards to these impacts

As per the Design and Access Statement (DAS) Addendum accompanying the application, the landscaping, permeable surfaces, and varied open spaces for the Proposed Development are designed to foster a healthy, natural environment for residents, visitors, and users.

The planned and approved greenery will continue to enhance air guality, contribute to urban cooling, and assist with surface water management. The landscape will offer areas that promote active living, learning, work, and child development, featuring spaces for play, gardening, and exploration of natural processes.

Two BREEAM credit is being targeted for LE 05 Long-Term Biodiversity Enhancement, with the implementation of a Biodiversity Management Plan serving as a prerequisite to ensure lasting ecological benefits.

Due to the original planning application, prior to this s73 amendment being approved before the requirement for BNG to be calculated this application does not require a BNG assessment.

A BNG calculation was not a requirement of the March 2023 Consented scheme, therefore this s73 application does not require a BNG calculation for the Proposed Development.

3.7 Sustainable Transport and Accessibility

		101	
	Table 14: Sustainable T	rans	sport and Accessibility
	Relevant applicable polic	ies	
	Camden Local Plan (2017)	•	Policy T1 Prioritising Walking, Cyc
		•	Policy T2 Parking and Car-free De
	Draft Camden Local Plan (2024)	•	T1: Safe, Healthy and Sustainable
		•	T3: Public Transport
	London Plan (2021)	•	Policy T1 Strategic Approach to Tr
		•	Policy T2 Healthy Streets
		•	Policy T4 Assessing and Mitigating
		•	Policy T5 Cycling

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Policy T6 Car Parking

Objectives, requirements and targets

- Provide adequate access for all modes, including walking, cycling and public transport.
- Ensure the public realm is permeable easy and safe to walk through and is adequately lit
- Reduce travel needs and encourage high-density, high-trip generating development around transport modes.
- Must be car-free and use legal agreements to ensure that future occupants are aware they are not entitled to on-street parking permits.
- The Council will prioritise the delivery of safe, active, healthy, affordable, and sustainable transport in line with the Council's Transport Strategy, Climate Action Plan, and Clean Air Action Plan to maximise health and well-being, reduce harmful emissions, improve air quality, help to tackle climate change and deliver sustainable communities
- The Council will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage, and timetable information.
- Where appropriate, development will also be required to provide for interchange between different modes of transport, including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

Ardent Consulting Engineers produced a Transport Technical Note (TN) accompanying the planning application. The development promotes sustainable travel by encouraging walking, cycling, and public transport use, with a car-free design, apart from accessible parking. Cycle parking facilities and improved pedestrian access further reinforce this commitment.

To encourage cycling, the development includes 1,195 long stay cycle parking spaces. Within the Main Site parcel (160 spaces on the PFS Site parcel). The development adheres to Camden's car parking policy by being predominantly car-free, with the exception of 18 blue badge spaces and 2 car club parking. In line with the London Plan, provisions for electric vehicle charging are also included. Cycle storage complies with the London Plan standards, providing secure and sheltered long-stay and short-stay spaces for residents and visitors.

The development follows the strategic approach by promoting active and sustainable transport modes. The site is located in a highly accessible area with excellent public transport links, and the infrastructure supports walking and cycling as primary modes of transport.

The development exceeds the minimum cycle parking requirements set out by the London Plan, providing ample long-stay and short-stay cycle parking. The site also benefits from connections to nearby cycle routes, encouraging cycling as a convenient and sustainable travel option. In alignment with the policy's objectives to reduce car dependency, the development limits parking to essential accessible bays and promotes electric vehicle charging infrastructure. This supports the broader goal of encouraging sustainable modes of transport and reducing reliance on motor vehicles.

Two BREEAM credits are being targeted for TRA 01 Transport Assessment and Travel Plan, with the preparation of a comprehensive Transport Assessment serving as a prerequisite. Six BREEAM credits are being targeted for TRA 02 Sustainable Transport Measures, with the potential to achieve an additional four credits through further

enhancements in sustainable and accessible transport solutions.

3.8 Design and Amenity

Table 15: [Design and Ame	nity			
Relevant applicable policies					
	•	Policy E2 Employment Premises			
Camden Lo	cal Plan •	Policy A1 Managing the Impact of			
(2017)	•	Policy D1 Design			
	•	Policy CC2 Adapting to Climate C			
Draft Camde Plan (2024)	en Local •	Policy D1 Achieving Design Exce			
	•	Policy D4 Delivering Good Desigr			
London Plan	n (2021) •	Policy E1 Offices			
		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, reusing, or redeveloping the Site has been fully explored
- Ensure the protection of amenities for the community, occupiers, and neighbours
- Ensure safe basement design with minimal impact to neighbouring buildings, local amenities, and heritage assets
- Be sustainable in design and construction
- Pursuing building certification standards such as BREEAM or Home Quality Mark
- All development in Camden must achieve excellence in the architecture and design of buildings and places to respond to the climate change emergency, improve the health and well-being of our communities and celebrate Camden's diversity of people and place.

As per the Design and Access Statement (DAS) Addendum prepared by Allies and Morrison, the Proposed Development is commitment to preserve the original vision for Camden Goods Yard. The approach has focused on minimising alterations while adapting the scheme to meet updated fire safety and building regulations, all while maintaining and enhancing the design quality and sense of place of the existing approval.

The landscape masterplan for the Proposed Development preserves the distinctive character areas and key functions of the existing scheme. Public spaces are thoughtfully designed to accommodate a range of needs, from vibrant urban and civic areas for community events and activities to tranquil spaces where individuals or small groups can unwind, garden, or enjoy a peaceful environment. This approach supports both social interaction and personal well-being, enhancing the overall sustainability of the development.

and Sites Development Change ellence



BREEAM is the world's first and leading sustainability assessment and certification scheme for the built environment. It assesses, encourages and rewards environmental, social, and economic sustainability throughout the built environment.

The Proposed Development will look to target BREEAM 'Excellent' certification and as such will strive to embed best practice sustainable design principles during the detailed design stage whilst adopting and implementing sustainable and responsible practices during the construction phase.

In addition to targeting BREEAM, the scheme will also look to embed circular economy principles and reduce its embodied carbon impact as far as possible (see section 3.2) above.

3.9 Heritage

Table 16: Heritage				
Relevant applicable policies				
Camden Local Plan (2017)	Policy D2 Heritage			
Draft Camden Local Plan (2024)	D5: Heritage			
London Plan (2021)	Policy HC1 Heritage Conservation and Growth			
Objectives, requirements and targets				
Minimise harm and loss of significance of heritage assets				

• The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings

Turley Heritage have produced a Heritage Statement Addendum in support of the application to assess the built heritage impacts of the proposed s73 application to vary the extant planning permission for the Camden Goods Yard project.

The statement confirms that no additional built heritage assets have been identified since the built heritage assessments within the 2017 Environmental Statement (as amended) and Heritage Statement (2017) (and Addenda).

The Proposed Development aims to revitalise the Camden area by addressing site constraints and integrating heritage assets into the townscape. The design, height, form, and relationship with heritage assets remain consistent with the March 2023 Consented scheme, ensuring minimal change in effects on the significance of the Regent's Canal Conservation Area and other heritage assets.

While some heritage harm is identified as "less than substantial," this harm is justified by public benefits, including the creation of a high-quality new neighbourhood and office space, which are considered in the planning balance.



4. Conclusion

This report demonstrates the Applicant's commitment to delivering a sustainable development in line with national, regional and local planning policies. 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 Proposed Development. The Proposed Development includes a range of sustainable design and construction features including:

- Energy: by following the energy hierarchy, optimising building performance, and implementing renewable technologies like air source heat pumps and photovoltaic systems, the development achieves significant carbon reductions
- Materials and Waste: the focus on sustainable materials, reduced waste generation, and the incorporation of a Whole Life Carbon Assessment further demonstrates a comprehensive approach to minimising embodied carbon throughout the building's lifecycle.
- Pollution and Nuisance: the Proposed Development I includes measures to mitigate air and noise pollution, such as incorporating mechanical ventilation heat recovery (MVHR) systems and limiting the reliance on open windows near busy roads. The design also addresses light pollution by following BREEAM guidance, ensuring minimal night-time pollution, and the implementation of modern construction methods reduces negative local environmental impacts.
- Water: water efficiency is achieved through the use of low-flow sanitaryware and water meters. The Proposed Development targets a 40% improvement in water efficiency compared to BREEAM baseline consumption. Leak detection systems will be installed to prevent water wastage.
- Sustainable Drainage and Flood Risk: a Flood Risk Assessment and Drainage Strategy has previously been undertaken for the scheme. The proposed works included in the Proposed Development do not affect these, therefore the previous report is considered to still be applicable for this application.
- Nature Conservation and Biodiversity: the Proposed Development enhances the biodiversity of the site through careful landscaping and the preservation of existing trees, while promoting sustainable transport by encouraging walking and cycling and providing facilities for electric vehicle charging. The design also takes into account air quality, noise reduction, and light pollution management, contributing to a healthier environment for both residents and the wider community.
- Sustainable Transport and Accessibility: the Proposed Development prioritises sustainable transport by promoting walking, cycling, and public transport, with a predominantly car-free design and excellent public transport links. It exceeds cycle parking requirements, improves pedestrian access, and includes provisions for electric vehicle charging, supporting a low-impact, sustainable travel approach.
- **Design and Amenity:** targeting BREEAM 'Excellent' certification, the design enhances the local environment by balancing high architectural standards with sustainable building features. The project includes daylight and sunlight assessments to ensure that the amenity spaces maintain quality while minimising adverse effects on neighbouring properties. Public realm improvements ensure a safe, attractive, and accessible environment.
- Heritage: the Proposed Development aims to revitalise the Camden area by addressing site constraints and integrating heritage assets into the townscape. The design, height, form, and relationship with heritage assets remain consistent with the March 2023 Consented scheme, ensuring minimal change in effects on the significance of the Regent's Canal Conservation Area and other heritage assets.

In conclusion, the Proposed Development application to vary the extant planning permission for the Camden Goods Yard project is committed to delivering a sustainable and environmentally responsible project in alignment with the Camden Local Plan and London Plan objectives. Through the integration of key sustainable design principles, including energy efficiency, circular economy practices, and water and waste management strategies, the development aims to minimise its environmental impact while enhancing the local area.

With a strong commitment to ongoing monitoring and review during the detailed design, construction, and operational phases, this development not only aligns with key local and regional policies but also exemplifies best practices in sustainable urban development. The result will be a high-quality, energy-efficient development that positively contributes to the community and the environment for years to come.



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