# Arches 29-41, Castle Mews, London, NW1 8SY

## Sustainability Statement

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| **Client** | The Arch Company Properties Limited |

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# Revision

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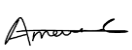
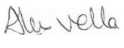
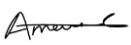
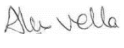
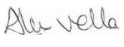
| R001 | Draft Issue for Comment | | A Cunnane |  | 05.07.24 | A Vella |  | 05.07.24 |
| R002 | Revised to incorporate comments | All | A Vella |  | 22/07/24 | A Cunnane |  | 22/07/24 |
| R003 | Revised to incorporate comments | All | A Vella |  | 31/07/24 | | | |
| R004 | Revised to show amended site boundary | 2 | A Vella |  | 30/01/25 | | | |
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# Executive Summary

As part of the planning submission process for Castle Mews development RED Engineering Design has been engaged to provide a sustainability report.

Having reviewed the scheme documents and in conjunction with current, local and national policy frameworks; The National Policy Framework 2023[1], The London Plan 2021[2] and The Camden Local plan 2017[3], this report demonstrates the applicant is committed to ensuring the scheme delivers a building that minimises its environmental impact.

The key features of the proposed Development with regard to sustainability are contained within the body of this report as follows;

- Refurbishment of existing commercial spaces instead of constructing new buildings
- Incorporating of biodiversity enhancement measures
- Minimisation of operational energy consumption through building fabric and building services efficiency measures;
- Inclusion of Low / Zero Carbon (LZC) technologies resulting in an overall reduction in $CO_2$ emissions
- Strategically located and easily accessible development, with provisions for cycle parking to promote sustainable and active transportation choices
- Implementing a mostly car-free scheme to reduce transport emissions with one 'blue badge' space being provided for accessibility.
- Enhanced biodiversity – whilst opportunities on site are limited there is a commitment to seek alternate opportunities and the adjacent school grounds are currently being evaluated in this regard.
- BREEAM has been evaluated in regards to the proposed works and found to be unlikely to drive sustainability. Alternative, more practical, ways of enhancing the site sustainability have been reviewed and are summarised in the BREEAM report. This includes actions such as monitoring and restricting waste, circularity of demolition waste, evaluating potential for cyclists, metering of all fuels, metering water and reducing use, encouraging sustainable materials, and improvements to building envelope. Opportunities for further enhancement will be sought as the project progresses.

Due to the central city location and nature of the site, some aspects of sustainable design are limited. However, the proposed development will implement on-site sustainability improvements to comply with both local and national policy requirements.

[1] National Planning Policy Framework (publishing.service.gov.uk)
[2] https://www.london.gov.uk/sites/default/files/the_london_plan_2021.pdf
[3] Camden Local Plan 2017

# Contents

# 1.0 Introduction

RED Engineering Design has been instructed on behalf of The Arch Company Properties Limited (the Applicant) in support of planning for Castle Road Mews, located in the borough of Camden (hereafter referred to as 'the Site').

This Sustainability Statement describes the approach that the design team has taken to integrate and consider sustainability during the design process. The purpose of this report is to assess the extent that the Site accords with the principles of sustainable development and the relevant planning policy requirements. The development of the sustainability strategy is based on the following principles:

- Set categorical objectives and constraints to cover all sustainability aspects
- Reduce upfront and operational Carbon emissions.
- Align to the transition to net-zero emissions future.
- Promote sustainable practices through design choices.

The project team for the Development includes, but is not limited to, the following parties.

| PROJECT TEAM | REPRESENTATIVE |
|---|---|
| Applicant | The Arch Company Properties Limited |
| Planning Consultant | Montagu Evans |
| Architect | RKG |
| Sustainability Consultant | RED Engineering Design |
| Acoustician | Air & Acoustic Consultants |
| Ecologist | Phlorum |
| Transport Consultant | TPA Transport Planning Associates |
| Air Quality Consultant | Air & Acoustic Consultants |
| Arboriculturist | ArbTech |

# 2.0 Site location and description

## 2.1 Existing Site Context

This site consists of 13 railway arches located under the North London Line, shown in Figure 1. The surrounding area consists predominately of residential properties to the west and commercial properties to the east. The Kentish Town West train station is situated to the north of the site.

## 2.2 Proposed Development / Scope of works

The application aims to fully refurbish 13 arches along with the adjoining warehouse. Arches 38 to 41 will remain open without infill, with provisions for electric charging points in arch 41. Arch 37 is designated as the ancillary office within the site.

The refurbished warehouse is planned to extend further to include arches 29 to 36. Currently, the site has an established Sui Generis use, which the application seeks to retain and add flexible Class B8 (storage and distribution) and/or Class E(g)(iii), (light industrial) use. The premises is intended for a single occupier.

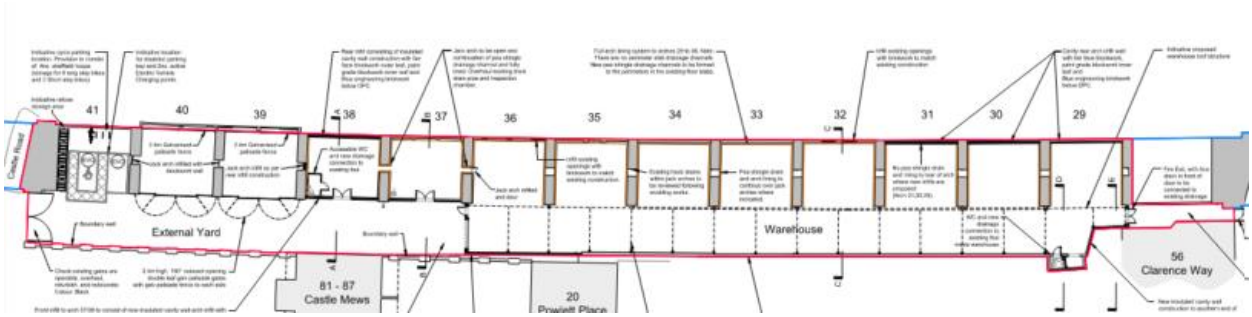



Figure 1. Site location – excerpt of rlg drawing 23-4758-PD-010 rev G

# 3.0 Policy Review

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

## 3.1 National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF), last revised in December 2023, plays a key role in delivering the Government's objectives on sustainable development. The NPPF has three overarching objectives, to promote effective environmental protection, foster well-designed, healthy communities and support economic growth and productivity. In this way, the guidance seeks to prioritise long term interests over short term success and encourages ownership at the local level. Camden Council has sought to incorporate core NPPF strategies into their Local Plan based on the principle of the presumption in favour of sustainable development. Key sustainability objectives within the NPPF are set out below:

- Reduce car dependency by promoting easy access to public transport;
- Ensure that all new development contribute the government's targets for carbon emission reductions;
- Promotion of Healthy Communities: Ensuring that new developments contribute to creating healthy and inclusive communities;
- Implement strategies to promote waste reduction, recycling and resource efficiency in development projects; and
- Integrating measures to enhance resilience to climate change impacts.

## 3.2 The London Plan (2021)

The London Plan, revised in March 2021, sets out the overall strategic plan for London and requires that growth and change in the city will be managed to realise the mayor's vision for London's sustainable development over the next 20-25 years.

In particular, development should respond to the energy and sustainability policies of the London Plan, including, but not limited to;

- Policy D5 Inclusive design
- Policy G5: Urban greening
- Policy SI 1: Improving air quality ;
- Policy SI 2: Minimising greenhouse gas emissions;
- Policy SI 3: Energy infrastructure;
- Policy SI 4: Managing heat risk;
- Policy SI 5: Water infrastructure;
- Policy SI 7: Reducing waste and supporting the circular economy;
- Policy SI 12: Flood risk management;
- Policy SI 13: Sustainable drainage;
- Policy T1: Strategic approach to transport;
- Policy T3: Transport capacity, connectivity and safeguarding;
- Policy T5: Cycling;
- Policy T6: Car parking; and
- The new Energy Hierarchy; Be Lean, Be Clean, Be Green

## 3.3 Camden Local Plan (2017)

The Camden Council (hereafter referred to as ('the council') Local Plan 2017 sets out the vision, strategic objectives and policies for development in Camden for the period 2016 to 2031. It forms the statutory development plan for the borough, along with the London Plan. The key policies that are most relevant to the project are discussed below.

### 3.3.1 Policy A3: Biodiversity

This policy is designed to support the London biodiversity strategy and Camden Biodiversity Action Plan (BAP) and aims to maximise opportunities for biodiversity in and around developments in order to deliver a net gain in biodiversity and a range of wider environmental benefits.

As such developments will be assessed against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed.

The demolition and construction phase of development, 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.

### 3.3.2 Policy A4: Noise and vibration

The policy seeks to ensure that noise and vibration is controlled and managed. As such, developments should have regard to Camden's Noise and Vibration Thresholds. Planning permission will not be granted for;

- Development likely to generate unacceptable noise and vibration impacts; or
- Development sensitive to noise in locations which experience high levels of noise, unless appropriate attenuation measures can be provided and will not harm the continued operation of existing uses.

The impact on local amenity from deliveries and from the demolition and construction phases of development should be minimised.

### 3.3.3 Policy CC1: Climate change mitigation

The council's 'green action for change' sustainability plan committed to a 40% $CO_2$ reduction by 2020. This policy seeks to:

- Promote zero carbon development
- Requires all major developments to meet London Plan $CO_2$ targets
- Minimise car travel
- Support decentralised energy networks
- Demolish only where proven to be impossible to retain buildings
- Optimise resource efficiency
- Assess the feasibility of connecting to a decentralised energy network

*To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.*

### 3.3.4 Policy CC2: Adapting to climate change

This policy requires refurbishments of non-domestic developments 500 sqm or more to demonstrate the following in a Sustainability Statement;

- The protection of existing green spaces and promote new appropriate green infrastructure;
- Not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems;
- Incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate;
- Measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy; and
- Non domestic developments of 500m² or more to achieve a BREEAM rating of Excellent.

The council is encouraging a move towards zero carbon in new developments from 2019.

### 3.3.5 Policy CC3: Water and flooding

This policy seeks to ensure that development does not increase flood risk and reduces the risk of flooding where possible and requires developments to;

- Incorporate water efficiency measures;
- Avoid harm to the water environment and improve water quality;
- Consider the impact of development in areas at risk of flooding (including drainage);
- Incorporate flood resilient measures in areas prone to flooding;
- Utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
- Not locate vulnerable development in flood-prone areas. Where an assessment of flood risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.

### 3.3.6 Policy CC4: Air quality

This policy requires the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken of the actions identified in the Council's Air Quality Action Plan.

Air Quality Assessments (AQAs) are required where a development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact.

### 3.3.7 Policy CC5: Waste

This policy seeks to make Camden a low waste borough. As such, developments are required to include facilities for the storage and collection of waste and recycling.

### 3.3.8 Policy C6: Access for all

This policy seeks to promote fair access and remove the barriers that prevent everyone from accessing facilities and opportunities. As such, all buildings are expected to meet the highest practicable standards of accessible and inclusive design so they can be used safely, easily and with dignity by all. A proactive approach to improving accessibility within the built environment is essential to increase the longevity to Developments

### 3.3.9 Policy E1: Economic development

This policy seeks to secure a successful and inclusive economy in Camden by creating the conditions for economic growth and harnessing the benefits for local residents and businesses. As such, the Council supports direct new office development to the growth areas, Central London, and the town centres in order to meet the forecast demand of 695,000sqm of office floorspace between 2014 and 2031.

Existing employment sites and premises in the borough that meet the needs of industry and other employers will be safeguarded

### 3.3.10 Policy T1: Prioritising walking, cycling and public transport

This policy requires developments to promote sustainable transport by prioritising walking, cycling and public transport in the borough. Specifically, developments should;

- Improve the pedestrian environment by supporting high quality public realm improvement works;
- Make improvements to the pedestrian environment including the provision of high quality safe road crossings where needed, seating, signage and landscaping;
- Be easy and safe to walk through ('permeable');
- Be adequately lit;
- Provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate;
- Provide for and make contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietway's Network, Cycle Super Highways;
- Provide for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan; and
- Make provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers.

### 3.3.11 Policy T2: Parking and car-free development

This policy limits the availability of parking and requires all new developments in the borough to be car-free. Onsite parking will be limited to spaces designated for disabled people where necessary, and/or essential operational or servicing needs.

On-street or on-site parking permits in connection with new developments will not be issued and legal agreements will be used to ensure that future occupants are aware that they are not entitled to on-street parking permits.

### 3.3.12 Policy T3: Transport infrastructure

The policy seeks improvement to transport infrastructure in the borough. As such, planning permission will not be granted for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects.

Existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport will be protected from removal or severance.

### 3.3.13 Policy T4: Sustainable movement of goods and materials

This policy promotes the sustainable movement of goods and materials and seek to minimise the movement of goods and materials by road. As such the following will be encouraged;

- The movement of goods and materials by canal, rail and bicycle where possible;
- Protection of existing facilities for waterborne and rail freight traffic; and
- Promotion of the provision and use of freight consolidation facilities.

# 4.0 Sustainability review of the Development

## 4.1 Design and amenity

Developments must respect the existing context, character, and appearance of the area, including improvements to the streetscape in order to positively contribute to the local area.

| RELEVANT APPLICABLE POLICIES | |
|---|---|
| Camden Local Plan (2021) | Policy C6: Access for all<br>Policy E1: Economic Development |

The Design and Access statement produced by Robison Kenning & Gallagher in support of planning demonstrates how the proposed site usage presents a significant opportunity to improve the streetscape of the area. It should be noted that the site is partially within the Harmood Street conservation area as defined by LB Camden.

Proposals include the demolition of front infills and mezzanines while converting two arches into open yard/parking spaces. This approach not only enhances spatial flexibility but also integrates green infrastructure elements where feasible.

The redevelopment seeks to contribute positively to the local community by rejuvenating an underutilised area and maximising economic viability in the surrounding areas.

## 4.2 Use of Natural Resources and Minimising Waste

A circular economy is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. The adoption of circular principles throughout the design and construction process will aim to reduce waste and move towards achieving net zero-waste.

| RELEVANT APPLICABLE POLICIES | |
|---|---|
| Camden Local Plan (2021) | Policy CC5: Waste |
| The London Plan (2021) | Policy SI 7: Reducing waste and supporting the circular economy<br>Policy SI 8: Waste capacity and net waste self-sufficiency |

The project should integrate circular economy principles throughout its lifecycle to minimise embodied carbon and operate within a circular economy framework, as illustrated in Figure 2. Emphasising waste prevention is given the top priority and can be effectively supported during the project's design phases. Utilising offsite prefabrication and selecting products with reduced transport packaging further contributes to minimizing waste materials brought to the site.

The proposals aim to reuse and modify the current incoming Mains Cold Water Service (MCWS), thereby lowering the environmental impact linked to manufacturing new materials and disposing of old ones. The retention of the existing West Flank Wall and original masonry construction of the arches will preserve the character and heritage of the building and reduce the upfront embodied carbon accounting for the reduced energy required for demolition and transportation of new materials.

During the construction phase of the development low levels of waste production will be targeted. This will be achieved through the development and implementation of a Site Waste Management Plan (SWMP) or equivalent for the site. The SWMP will detail how methods / practices on site will be in accordance with the waste hierarchy Targets for the diversion of waste from landfill.

Waste materials will be sorted into separate key waste groups either onsite or offsite through a licensed contractor recovery. In addition, consideration has been given to the operational waste of the site, hence waste facilities will be provided, in line with Local Authority's requirements. The site will be designed to provide appropriate waste / recycling segregation storage facilities.

Figure 2. Waste Hierarchy


## 4.3 Sustainable Transport

Appropriate transport links are a key element of sustainable development, so that low carbon transport choices can be made. Camden Council promotes sustainable transport choices in order to mitigate the impact of developments on the environment, improve air quality, promote healthier lifestyles and respond to congestion affecting roads and transport.

| RELEVANT APPLICABLE POLICIES | |
|---|---|
| Camden Local Plan (2021) | Policy T1: Prioritising walking, cycling and public transport<br>Policy T2: Parking and car-free environment<br>Policy T3: Transport infrastructure<br>Policy T4: Sustainable movement of goods and materials |
| The London Plan (2021) | Policy T1: Strategic approach to transport<br>Policy T3: Transport capacity, connectivity and Safeguarding<br>Policy T5: Cycling<br>Policy T6: Car parking |

The Site is situated within a highly accessible town centre location and proposals are for a car free development. Kentish Town West Underground station is circa 260m from the site which provides direct links to London. As a result, the site achieves a PTAL Rating of 6a. Accordingly, the development is designed to be car-free, with the exception of two electric vehicle charge points.

Developments which discourage car use significantly reduce the reliance on private vehicles and align with national, regional, and local planning policies. The area benefits from high pedestrian activity and robust pedestrian infrastructure, including signalised crossings, lowered curbs, and tactile paving. The site will provide one disabled car parking space.

A Transport Statement prepared by TPA Transport Planning Associates in support of planning [Ref: 2405-034/TS/01] outlines the availability of active transport in the surrounding area. This includes TFL Cycleway route C6 located 140m north, two Sheffield stands 160m east, and bus services 36 and 393 approximately 140m to the north. The development will provide onsite parking for five long-stay and two short-stay bicycles, adhering to standards outlined in Camden and London Plans.

The transport statement concludes that the proposed development anticipates up to 14 deliveries per day, which are expected to have a negligible impact and be accommodated within normal daily traffic fluctuations. Therefore, the development is not expected to significantly affect any transportation modes.

## 4.4 Energy

In order to contribute towards The London Plan target of a 60% reduction of carbon emissions by 2050, Camden Council recognises the importance of incorporating sustainable aspects into building design to reduce carbon emissions.

| RELEVANT APPLICABLE POLICIES | |
|---|---|
| Camden Local Plan (2021) | Policy CC1: Climate change mitigation<br>Policy CC2: Adapting to climate change |
| The London Plan (2021) | Policy SI 2: Minimising greenhouse gas emissions; The energy hierarchy<br>Policy SI 3: Energy infrastructure<br>Policy SI 4: Managing heat risk |

The Proposed Development will deliver the maximum possible sustainability improvements to the site in line with the 'Energy Hierarchy' identified in The London Plan, figure 3.

### Be Lean – Use Less Energy

- Upgraded building fabric with very high levels of insulation
- High levels of air tightness
- Optimised glazed areas
- Solar control glazing to minimise cooling loads
- Air Source heat Pump (ASHP) for space heating at arches 36 and 37 with no gas on site
- High Efficacy LED Luminaires
- EPC Rating requirement of B

### Be Clean – Supply Energy Efficient

The next step in the energy hierarchy is the 'be clean' strategy of supplying the required energy. Two options for decentralised energy are evaluated within the Energy Statement; district heating and combined heat and

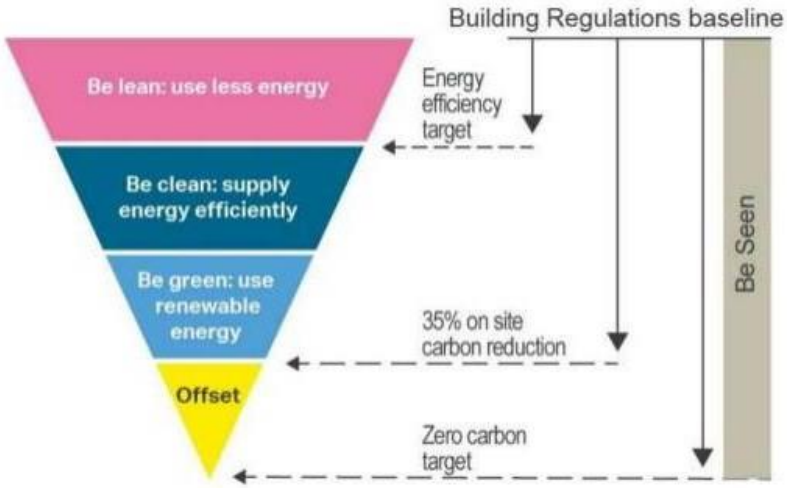
power (CHP). At the time of writing, no existing or proposed district heat networks are identified within close proximity to the proposed development. Furthermore, creating a new heat network would not be feasible within the constraints of the site.

Combined Heat and Power is unfeasible for the proposed development, given that the recent decarbonisation of the UK national grid has led to a reduction in carbon emissions from grid electricity, resulting in CHP no longer offering the required carbon savings. Furthermore, burning fossil fuels on site would have a detrimental impact on local air quality in an area already identified as an Air Quality Management Area (AQMA).

**Be Green – Use Renewable Energy**

The feasibility of Low / Zero Carbon technologies such as biomass, wind turbines, solar domestic hot water, ground source heat pumps, photovoltaics (PV) and Air Source Heat Pumps is considered limited due to the location of the sites beneath an active railway line. The most practical systems to meet the required energy and CO2 emissions reductions are considered to be Air Source Heat Pumps.

Figure 3. Energy Hierarchy




## 4.5 Water

Current climate projections forecast significant reductions in UK rainfall, with rainfall in the South of England projected to be halved during summer months by 2080. The incorporation of water efficiency measures into buildings will, therefore, be critical in limiting future deficits in water availability as well as reducing associated carbon emissions. Camden Council recognises the need for the implementation of water saving measures within building design.

| RELEVANT APPLICABLE POLICIES | |
|---|---|
| Camden Local Plan (2021) | Policy CC2: Adapting to climate change<br>Policy CC3: Water and flooding |
| The London Plan (2021) | Policy SI 5: Water infrastructure |

### 4.5.1 Water efficiency

As part of the BREEAM and Sustainability Report conducted by RED [R002], a sustainability watching brief has been established, alongside a sustainability checklist. The development has the potential to integrate

measures aimed at reducing water demand and usage. This can be achieved through the installation of high-efficiency sanitaryware, such as low-flow taps, showers, and low-flush toilets.
Additionally, installing a water meter on the building's main water supply would enable the precise monitoring of water consumption, and help reduce water wastage.

## 4.6 Sustainable drainage and flood risk

The Council recognises the potential for increases in frequency and intensity of localised storms over the Borough as a result of climate change. Such rainfall patterns will exacerbate localised drainage problems, which may be increased by the use of non-porous materials in construction. Developments are, therefore, required to adopt the principles of Sustainable Urban Drainage Systems (SuDS) to ensure that surface water is managed sustainably and effectively.

| RELEVANT APPLICABLE POLICIES | |
|---|---|
| Camden Local Plan (2021) | Policy CC2: Adapting to climate change<br>Policy CC3: Water and flooding |
| The London Plan (2021) | Policy SI 12: Flood risk management<br>Policy SI 13: Sustainable drainage |

### 4.6.1 Surface water run-off rate

In order to achieve optimal discharge rates, the drainage infrastructure will be designed to regulate the discharge rate of surface water runoff from the development.

It should be noted that the proposed development does not increase impermeable area.

## 4.7 Nature conservation and biodiversity

The protection and enhancement of biodiversity in the Borough is crucial, particularly in the context of biodiversity losses due to development pressure, climate change and deficiencies in access to nature.

| RELEVANT APPLICABLE POLICIES | |
|---|---|
| Camden Local Plan (2021) | Policy A3: Biodiversity |
| The London Plan (2021) | Policy G1: Green infrastructure<br>Policy G5: Urban greening<br>Policy G6: Biodiversity and access to nature |

A Preliminary Ecology Appraisal has been undertaken by Phlorum in support of planning [Ref: 13111]. It is understood that the Site is not subject to any statutory or non-statutory designations. The closest statutory site is Adelaide LNR located approximately 0.98km to the southwest at its closest point and the survey area does not support any features that contribute to the designation of this site.

An arborircultural survey was undertaken in June 2024 and report produced by Arbtech [Ref: TSR 01]. The only recommendations made were for further assessments to be carried out.

The Site offers restricted opportunities to support roosting bats as a result of the lack of vegetation. To enhance biodiversity net gain, installing bird and bat boxes on refurbished buildings will be considered. Introducing additional ecological enhancements through new planting of native tree and shrub species would make a valuable contribution to urban greening efforts, however there is extremely limited space to do so within the site boundary. Off site opportunities are being investigated.

## 4.8 Environmental Certification

All developments must achieve the highest feasible level of the relevant sustainable design standards in order to contribute to Camden Council's overarching sustainability objectives.

| RELEVANT APPLICABLE POLICIES | |
|---|---|
| Camden Local Plan (2021) | Policy CC2: Adapting to climate change |

As part of developing the site's sustainability strategy, the building elements have been reviewed against the BREEAM Refurbishment and Fit-out 2014 methodology.

A BREEAM evaluation has been undertaken by a licensed assessor and a report has been produced [R003] which indicates that only one of the parts of the RFO 2014 scheme could be triggered by the proposed scope of works. After reviewing all requirements for this scheme, especially the mandatory elements, it has been determined that an assessment would be unlikely to achieve a meaningful score in a sustainable manner.

The constraints of this site are the live railway line above and restrictions on fixing or altering any of the arch 'envelope'. The site is fully impermeable with no opportunity for ground planting or fixing of items such as planters, bird boxes, etc. to the facades. Also the extent of works proposed being below the trigger thresholds and in the one part which could be triggered the type of services proposed are inherently sustainable.

A number of measures have been identified as possible in the context of the current works. These include actions such as monitoring and restricting waste, circularity of demolition waste, evaluating potential for cyclists, metering of all fuels, metering water and reducing use, encouraging sustainable materials, and improvements to building envelope. Opportunities for further enhancement will be sought as the project progresses.

Therefore, it is concluded that a BREEAM assessment is not suitable for these units. However, the sustainability consultant will maintain a watching brief, and all practical measures will be explored and implemented where feasible to create the most sustainable site possible.

## 4.9 Pollution

All developments must be designed, constructed and operated to limit contribution to poor air quality and excessive noise as far as possible.

| RELEVANT APPLICABLE POLICIES | |
|---|---|
| Camden Local Plan (2021) | Policy A4: Noise and vibration<br>Policy CC4: Air quality |
| The London Plan (2021) | Policy SI 1: Improving air quality.<br>Policy SI 2: Minimising greenhouse gas emissions |

### 4.9.1 Air Quality

Proposals seek to improve building layout with consideration to air quality, such as the placement of air outlets away from pollution sources (e.g., high traffic roads). Ventilation systems will be specified with high quality levels of filtration in proportion to local air pollution levels and IAQ sensors will allow for continuous monitoring of pollutants.

An Air Quality Assessment has been prepared by Air & Acoustic Consultants in support of planning. This confirms the proposed development to be located within an Air Quality Management Area (AQMA) and also within 60m of the 'Camden High Street from Mornington Cresent to Chalk Farm and Camden Road' Air Quality Focus Area (AQFA).

Overall, the local air quality impacts from the proposed development, including construction works, are considered to be 'insignificant' and comply with local, regional and national policies. The proposed development is compliant with the requirements of the AQN guidance in respect of both building and transport emissions and is therefore considered to be an air quality neutral assessment.

### 4.9.2 Noise

A Noise Assessment report has been prepared by Air & Acoustic Consultant in support of planning (Ref: 100777). The assessment confirms that no plant or equipment associated with the end use of the units is included in the proposal. Potential impacts on nearby residential properties during the operational phase will be ascertained and measures advised, if required to ensure noise levels remain below the Lowest Observed Adverse Effect Level (LOAEL) classification.

Therefore, it can be concluded that the Site is unlikely to contravene national, regional, and local planning policies or guidelines. The impacts are expected to be classified as below the LOAEL threshold.

# 5.0 Conclusion

This report demonstrates how the proposed Development accords with the sustainability requirements of the NPPF and Camden Local Plan. The applicant is committed to ensuring the scheme delivers a building that is high quality and minimises its environmental impact.

The Key features of the proposed Development with regard to sustainability are as follows;

- Refurbishment of existing commercial spaces instead of constructing new buildings
- Incorporating of biodiversity enhancement measures
- Minimisation of operational energy consumption through building fabric and building services efficiency measures;
- Inclusion of Low / Zero Carbon (LZC) technologies resulting in an overall reduction in $CO_2$ emissions
- Strategically located and easily accessible development, with provisions for cycle parking to promote sustainable and active transportation choices
- Implementing a mostly car-free scheme, with the exception of one blue badge space, to reduce transport emissions.