CHAPTER 3.0

POLICY CONTEXT

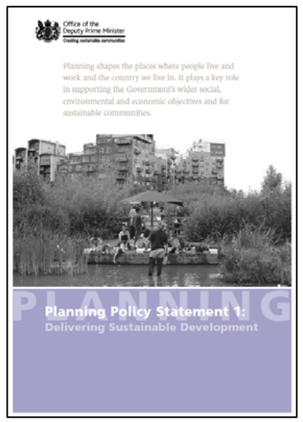
3.0 Policy Context

3.1
Policy Context
Rising international and national aspirations have led to the strengthening of national planning policies and building control processes that contribute to the Government's long-term commitment to support sustainable development.

3.2
National Policy Context
In May 1999 the UK Government published its sustainable development strategy entitled A Better Quality of Life (Ref. 01). This sets out objectives for sustainable development in the UK as follows:

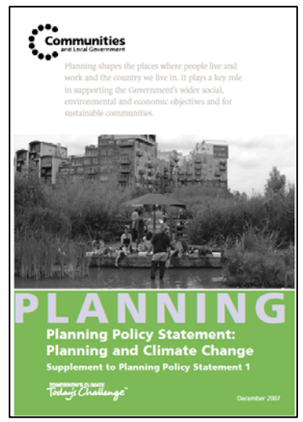
- Ensuring a strong, healthy and just society;
- Social progress that recognises the needs of everyone;
- Effective protection of the environment;
- Prudent use of natural resources; and
- Maintenance of stable, high levels of economic growth and employment.

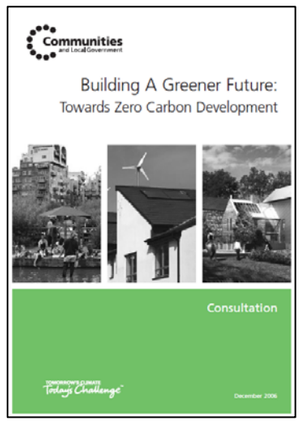
3.3
This led to the Office of the Deputy Prime Minister (ODPM) (now Communities and Local Government (CLG)) publishing an updated strategy in 2003 entitled Sustainable Communities: Building for the Future (Ref. 02) which introduced reforms to the planning system and incentives to improve the performance of buildings, driving a change in planning culture.



3.4
Planning Policy Statement 1 (PPS1): Delivering Sustainable Development (Ref. 03), published in 2005, sets out the Government's overarching planning policies on the delivery of sustainable development through the planning system. In delivering sustainable development it expects the following objectives to be achieved:

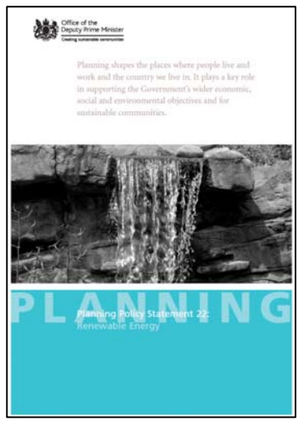
- Promoting regional, sub-regional and local economies;
- Promoting communities which are inclusive, healthy, safe and crime free;
- Bringing forward sufficient land of a suitable quality in the right locations;
- Giving high priority to ensuring access for all to jobs, health, education, shops, leisure and community facilities;
- Focusing developments that attract a large number of people, especially retail development, in existing centres;
- Recognising the need to enhance as well as protect biodiversity and the need to address the causes and impacts of climate change and pollution;
- Promoting the efficient use of land; and
- Reducing the need to travel.





3.5
Planning Policy Statement 1 (PPS1): Planning and Climate Change (Ref. 04), published in 2007, supplements Planning Policy Statement 1: Delivering Sustainable Development. The Planning Policy Statement 1 (PPS1): Planning and Climate Change sets out how spatial planning should contribute to reducing emissions and stabilising climate change (mitigation) and take into account the unavoidable consequences (adaptation). This document is part of a wider package of action being taken forward by the CLG to deliver the Government's ambition of achieving zero carbon development. This includes a consultation document, Building a Greener Future: Towards Zero Carbon Development (Ref. 05), which sets out how planning and building regulations can drive change and innovation and deliver improvements to the environment.

3.0 Policy Context



3.6
Planning Policy Statement 22 (PPS22): Renewable Energy (Ref. 06) sets out the Government's policies for renewable energy, to which planning authorities should have regard when preparing local development documents and when taking planning decisions. The following key planning principles for renewable energy should be adhered to:

- Renewable energy developments should be capable of being accommodated in locations where the technology is viable and environmental, economic and social impacts can be addressed satisfactorily;
- Promote and encourage the development of renewable energy resources and recognise the full range of renewable energy sources, their differing characteristics, locational requirements and the potential for exploiting them subject to appropriate environmental safeguards;
- The wider environmental and economic benefits of all proposals for renewable energy projects, whatever their scale, are material considerations that should be given significant weight in determining whether proposals should be granted planning permission; and
- Foster community involvement in renewable energy projects and seek to promote knowledge of and greater acceptance by the public of prospective renewable energy developments that are appropriately located.

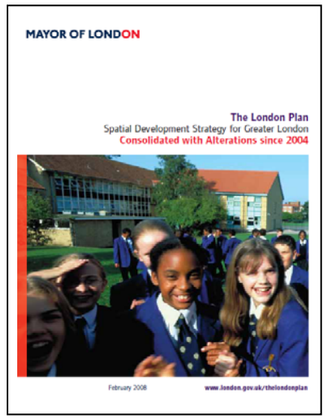
3.7
As per PPS22 (Ref. 06), local planning authorities should include policies in local development documents that require a percentage of the energy to be used in new developments to come from on-site renewable energy. Such policies should:

- Ensure that the requirement to generate on-site renewable energy is only applied to developments where the installation of renewable energy generation equipment is viable given the type of development proposed, its location and design; and
- Not be framed in such a way as to place an undue burden on developers.

3.8
The UK Parliament has passed various Acts addressing sustainability and energy issues. The following are among the most recent:

- The Climate Change Act 2008 (Ref. 07) sets up a framework for the UK to achieve its long-term goals of reducing greenhouse gas emissions by 80% over the 1990s baseline by 2050 and to ensure steps are taken towards adapting to the impact of climate change. The Act introduces a system of carbon budgeting which constrains the total amount of emissions in a given time period. It sets out a procedure for assessing the risks of the impact of climate change for the UK and a requirement on the Government to develop an adaptation programme. The Act will be used to support emissions reductions through several specific policy measures;
- The Energy Act 2008 (Ref. 08) implements the legislative aspects of the White Paper: Meeting the Energy Challenge (Ref. 09) and manages the processes related to the renewables obligation; and
- The Planning and Energy Act 2008 (Ref. 10) enables local planning authorities to set requirements for energy use and energy efficiency in local plans.

3.0 Policy Context



3.9

Regional Policy Context

The London Plan (2010)

The London Plan (Ref. 11) sets out the planning requirements within the London context and identifies six main objectives:

- To accommodate London's growth within its boundaries without encroaching on open spaces;
- To make London a healthier and better city for people to live in;
- To make London a more prosperous city with strong, and diverse long term economic growth;
- To promote social inclusion and tackle deprivation and discrimination;
- To improve London's accessibility; and
- To make London an exemplary world city in mitigating and adapting to climate change and a more attractive, well-designed and green city.

3.10

Policy 4A.1: Tackling Climate Change of the London Plan requires developments to make the fullest contribution to the mitigation of and adaptation to climate change and to minimise emissions of CO_2. The Mayor's Energy Hierarchy will be used to assess applications:

- Using less energy, in particular by adopting sustainable design and construction measures (Policy 4A.3);
- Supplying energy efficiently, in particular by prioritising decentralised energy generation (Policy 4A.6); and
- Using renewable energy (Policy 4A.7).

3.11

Integration of adaptation measures to tackle climate change should most effectively reflect the context of each development – for example, its nature, size, location, accessibility and operation. The Mayor will and boroughs should ensure that development is located, designed and built for the climate that it will experience over its intended lifetime.

3.12

According to Policy 4A.3: Sustainable Design and Construction, seeks to ensure future developments meet the highest standards of sustainable design and construction. These will include measures to:

- Make most effective use of land and existing buildings;
- Reduce CO_2 and other emissions that contribute to climate change;
- Design new buildings for flexible use throughout their lifetime;
- Avoid internal overheating and excessive heat generation (Policy 4A.10);
- Make most effective and sustainable use of water, aggregates and other resources;
- Minimise energy use through passive solar design, natural ventilation, and the use of vegetation on buildings;
- Supply energy efficiently and incorporate decentralised energy systems (Policy 4A.6), and use renewable energy where feasible (Policy 4A.7);
- Minimise light lost to the sky, particularly from street lights;
- Procure materials sustainably using local suppliers wherever possible;

3.0 Policy Context

- Ensure designs make the most of natural systems both within and around the building;
- Reduce air and water pollution;
- Manage flood risk, including through sustainable urban drainage systems (SUDS) and flood resilient design for infrastructure and property;
- Ensure developments are comfortable and secure for users;
- Conserve and enhance the natural environment, particularly in relation to biodiversity, and enable easy access to open spaces;
- Avoid creation of adverse local climatic conditions;
- Promote sustainable waste behaviour in new and existing developments, including support for local integrated recycling schemes, Combined Heat and Power (CHP) and Combined Cooling Heat and Power (CCHP) schemes and other treatment options;
- Encourage major developments to incorporate living roofs and walls where feasible (Policy 4A.11); and
- Reduce adverse noise impacts.

3.13
Policy 4A.4: Energy Assessment supports the Mayor's Energy Strategy (Ref. 12) and its objectives of improving energy efficiency and increasing the proportion of energy used generated from renewable sources. It requires an assessment of the energy demand and CO_2 emissions from proposed major developments, which should demonstrate the expected energy and CO_2 emission savings from the energy efficiency and renewable energy measures incorporated in the development, including the feasibility of CHP/CCHP and community heating systems. The assessment should include:

- Calculation of baseline energy demand and CO_2 emissions;
- Proposals for the reduction of energy demand and CO_2 emissions from heating, cooling and electrical power (Policy 4A.6);
- Proposals for meeting residual energy demands through sustainable energy measures (Policies 4A.7 and 4A.8: Hydrogen Economy); and
- Calculation of the remaining energy demand and CO_2 emissions.

3.14
Policy 4A.5: Provision of Heating and Cooling Networks requires all new development to be designed to connect to heating and cooling networks.

3.15
Policy 4A.6: Decentralised Energy: Heating, Cooling and Power requires new developments to demonstrate that their heating, cooling and power systems have been selected to minimise CO_2 emissions.

3.16
Policy 4A.7: Renewable Energy requires all new developments to achieve a reduction in CO_2 emissions of 20% from on-site renewable energy generation unless it can be demonstrated that such provision is not feasible. This will support the Mayor's Climate Change Mitigation and Energy Strategy and its objectives of increasing the proportion of energy used generated from renewable sources.

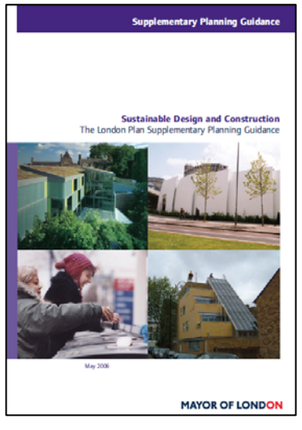
3.17
Policy 4A.9: Adaptation to Climate Change promotes and supports the most effective adaptation to climate change, including:

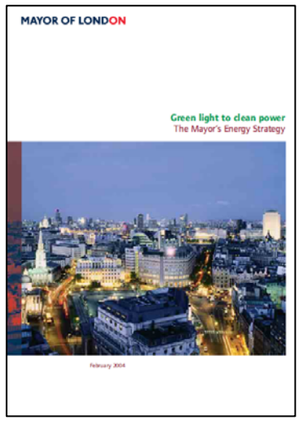
- Minimising overheating and contribution to heat island effects (Policy 4A.10);
- Minimising solar gain in summer (Policy 4A.10);
- Contributing to reducing flood risk including applying principles of sustainable urban drainage (Policies 4A.13 and 4A.14);
- Minimising water use (Policy 4A.16); and
- Protecting and enhancing green infrastructure.

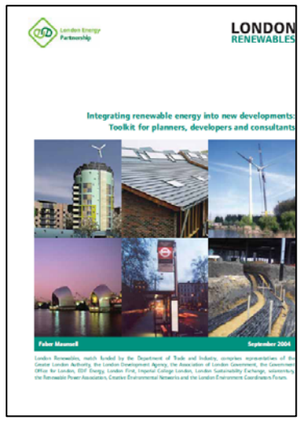
3.18
The Replacement London Plan
The Draft Replacement London Plan (Ref. 13) was published for consultation in October 2009, setting out the Mayor's approach to planning. The London Plan Examination in Public (EiP) opened on 28 June 2010 and is scheduled to conclude by 22 October 2010. The Replacement London Plan is scheduled to be adopted by the end of 2011. As the draft policies have not been examined, they will have little weight attached to them.

3.19
The Replacement London Plan, which establishes policy to 2031, retains the fundamental objective of accommodating London's population and economic growth through sustainable development. The Mayor's vision is for London to "excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change. Achieving this will mean making sure London makes the most of the benefits of energy, dynamism and diversity that characterise the city and its people: embraces change while promoting its heritage, neighbourhoods and identity; and values responsibility, compassion and citizenship."

3.0 Policy Context







3.20
Sustainable Design and Construction Supplementary Planning Guidance
In May 2006 the Mayor published a Supplementary Planning Guidance (SPG) on 'Sustainable Design and Construction' (Ref. 14) to provide guidance to developers on sustainable design and construction to support the implementation of the London Plan. This SPG provides an essential context for all developments and provides a mechanism for addressing climate change impacts through new developments. It contains essential standards and the Mayor's preferred standards and also identifies several methodologies that can be used to measure and demonstrate sustainability.

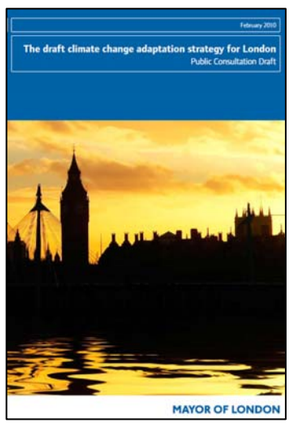
3.21
The Mayor's Energy Strategy
The Mayor's Energy Strategy (Ref. 12) provides a vision and strategic framework for the Mayor's energy policy as set out in the London Plan. Delivery of this strategy comprises the combined approach of:

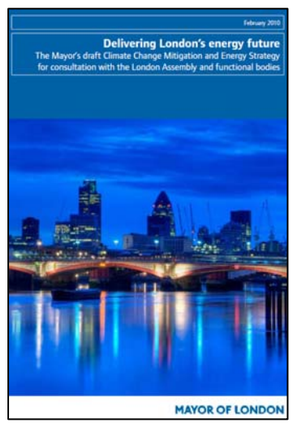
- Reducing London's contribution to climate change by minimising emissions of CO_2 from all sectors (i.e., commercial, domestic, industrial and transport) through energy efficiency, CHP, renewable energy and hydrogen;
- Helping to eliminate fuel poverty by giving Londoners, particularly the most vulnerable groups, access to affordable warmth; and
- Contributing to London's economy by increasing job opportunities, delivering sustainable energy and improving London's housing and other building stock.

3.22
Renewables Toolkit
The London Energy Partnership document 'Integrating Renewables into New Developments: Toolkit for Planners, Developers and Consultants' (Ref. 15), otherwise known as the 'Renewables Toolkit' provides a review of the planning context, guidance on feasibility studies, case histories and cost models for a wide range of applications. Renewables are defined as solar hot water, photovoltaics, biomass heating or CHP, geothermal, ground source heat pumps, borehole cooling, solar air heating, fuel cells using hydrogen from a renewable source, gas from anaerobic digestion, ground cooling and micro hydro-electric schemes.

3.23
Guidance on Planning Energy Assessment
The GLA Energy Team published a guidance note on planning energy assessments in October 2009 (Ref. 16). This note provides details on how to address the London Plan's energy hierarchy through the provision of an energy assessment to accompany strategic planning applications.

3.0 Policy Context





3.24
The Mayor's Draft Climate Change Adaptation Strategy
The aim of the Mayor's Draft Climate Change Adaptation Strategy (Ref. 17) is to assess the consequences of climate change on London and to prepare for the impacts of climate change. This aim will be met through achieving the following objectives:

- Identify and prioritise climate risks and opportunities facing London and key actions required to prepare London;
- Promote and facilitate new development and infrastructure that is located, designed and constructed for the climate it will experience over its design life;
- Improve the resilience of London's existing development and infrastructure to the impacts of climate change;
- Ensure emergency management plans exist for the key risks;
- Help business, public sector organisations and other institutions prepare for the challenges and opportunities presented by climate change;
- Facilitate the adaptation of the natural environment;
- Raise general awareness and understanding of climate change; and
- Position London as an international leader in tackling climate change.

3.25
The Mayor's Draft Climate Change Mitigation and Energy Strategy
The vision of the Mayor's Draft Climate Change Mitigation and Energy Strategy (Ref. 18) is to make London one of the world's leading low carbon cities by 2025.

3.26
To achieve this vision, the following measures are being implemented:

- Homes and buildings energy efficiency programme to retrofit homes and public sector buildings;
- Low carbon zones programme to establish ten Low Carbon Zones in London;
- Decentralised energy including energy from waste programmes to develop and fund new decentralised energy projects across the city;
- Electric vehicle roll-out to introduce 1,000 vehicles into the GLA fleet and new charging infrastructure to support the introduction of 100,000 electric vehicles on London's streets;
- Promotion of energy efficient buildings and low and zero carbon energy generation; and
- Endorsement of sustainable means of transport.

3.27
The Mayor's Biodiversity Strategy
The objectives of the Mayor's Biodiversity Strategy (Ref. 19) include:

- Ensuring all Londoners have ready access to wildlife and natural green spaces;
- Conserving London's plants, animals and their habitats;
- Encouraging businesses to incorporate green design into their development proposals;
- Promoting the functional benefits of biodiversity, for example flood and erosion prevention and the amelioration of ambient noise and absorption of pollutants; and
- Providing sustainable development: good quality open spaces together with green footpaths and cycleways; growing food locally and organically in allotments and gardens (providing wildlife habitat) and composting green waste and growing energy crops in London to reduce its wider ecological footprint.

3.0 Policy Context

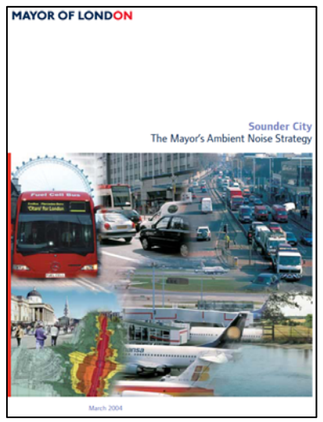
3.28

The Mayor's Draft Municipal Waste Management Strategy

The overriding key consideration influencing the Mayor's municipal waste management strategy (Ref. 20) is the need to manage London's municipal waste effectively and efficiently.

3.29

The Mayor's vision is to reduce the amount of municipal waste generated by the capital, significantly increase recycling and composting performance and to generate energy from rubbish that cannot be reused or recycled, in the most environmentally friendly way possible.

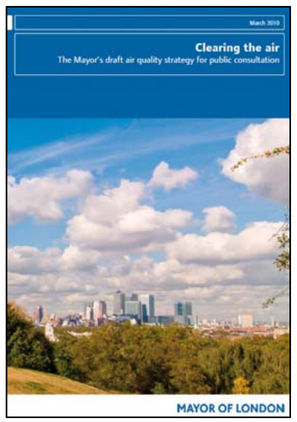


3.30

The Mayor's Ambient Noise Strategy

The overall aim of the of the Mayor's Ambient Noise Strategy (Ref. 21) is to "minimise the adverse impacts of noise on people living and working in, and visiting London using the best available practise and technology within a sustainable development framework". Thus, in the context of building design, the Strategy suggests measures such as:

- Designing buildings to screen housing and other uses from noise, and create quiet outdoor spaces;
- Combining photovoltaic cells, which convert sunlight into electricity, with noise screening;
- Building over noise sources so enhancing the protection of local areas while providing new spaces for local needs; and
- Guiding late-night activities to suitable areas, where better planning, policing, transport and street management can be focused.



3.31

The Mayor's Draft Air Quality Strategy

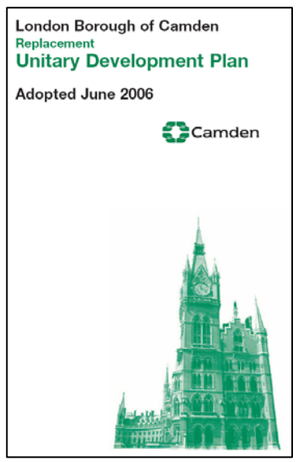
The first priority of the Mayor's Air Quality Strategy (Ref. 22) is to achieve European Union limit values for PM10, PM2.5 and NO_2 in London.

3.32

The Mayor's vision for air quality is to protect and improve the health of Londoners and increase their quality of life by significantly improving the quality of the air we breathe in London. This will:

- Make London a more pleasant place to live and work in;
- Reduce the burden on health services in the capital;
- Enhance London's position as a green city – making it more attractive to tourists and businesses; and
- Make London cleaner whilst safeguarding its biodiversity.

3.0 Policy Context



3.33
Local Policy Context
Camden Replacement Unitary Development Plan
The Camden Replacement Unitary Development Plan (RUDP) (Ref. 23), adopted in June 2006, sets out the Council's long-term strategic goals for land use, together with the planning policies and standards that will be used to make decisions on planning applications.

3.34
In September 2004 a major reform of the planning system was introduced through the Planning and Compulsory Purchase Act. As part of the reform, the RUDP plans will be replaced by Local Development Frameworks (LDF). Camden Council is currently consulting on a number of LDF documents. The RUDP was subject to a Secretary of State Direction in June 2009 (under Paragraph 1(3) of Schedule 8 of the Planning and Compulsory Purchase Act 2004) to save some of its policies. The policies not listed in the Direction Notice expired on 26 June 2009. At the present moment the Camden Replacement RUDP is the statutory plan that covers the whole of the borough and sets out the Council's planning policies.

3.35
The RUDP seeks to achieve sustainable new development of the highest quality in the most suitable locations, while protecting and enhancing the built and natural environment. It aims to improve the quality of life of the people who live in, work in and visit the Borough and support sustainable communities. The RUDP strategic planning aims include:

- Making sure development is sustainable and meets the Council's social, economic and environmental needs, now and in the future;
- Meeting the housing needs of Camden's population;
- Producing an environmentally sustainable pattern of land use and reducing the need to travel;
- Helping to improve and protect amenity and quality of life;
- Protecting and enhancing the environment;
- Providing facilities for all members of the community;
- Improving economic prosperity and diversity;
- Protecting and improving Camden's town centres; and
- Balancing the needs of residents with the Borough's London-wide role.

3.36
Camden Planning Guidance
Camden Planning Guidance (Ref. 24), adopted in December 2006, supports the RUDP and gives additional advice and information on how the RUDP policies are applied when decisions are made on planning applications.

3.37
According to the guidance, to promote sustainable design and construction, development proposals must include the following elements:

- A BREEAM Pre-Assessment Estimator, completed by a qualified BREEAM Assessor, must be provided with the application to show that the expected rating can be met. If approval is granted, a Design Stage Assessment, including BRE Certification, will be required prior to commencement of works and a Post Construction Review Stage Assessment must be completed before occupation of the building.

  BREEAM is a method of assessing the environmental performance/sustainability of buildings using nine criteria; management, energy use, health and well-being, pollution, transport, land use, ecology, materials, water. The Council has chosen BREEAM as its assessment methods for sustainability as they cover a broad range of sustainability issues, are well tested, and are widely accepted across the UK.

  The Council has set challenging targets for achieving sustainability in response to national, regional and local policy goals for better performance. The Council will expect developments of 1,000m^2 or more floorspace to be designed, constructed and fitted so that they

obtain at least 60% of the available credits under Energy, 40% of the credits under Materials and 60% of the credits under Water, and an overall BREEAM rating of 'Very Good' or 'Excellent'.

Where the expected proportion of BREEAM credits in the BREEAM Assessment is not achieved, sound justification must be provided to demonstrate to the Council's satisfaction why the proposal cannot meet the criteria. This justification should be prepared in conjunction with and endorsed by the BREEAM Assessor;

- A statement must be provided to show how the proposal will, through design and construction measures:
  - Reduce energy consumption;
  - Reduce water consumption and reduce water runoff; and
  - Reduce the use of materials and resources in construction and reduce waste from the construction process.
- A statement must be provided to show how the proposal will incorporate onsite energy generation from renewable sources.

3.38
Camden Local Development Framework
The new planning system introduced by the Planning and Compulsory Purchase Act 2004 (Ref. 25) replaces Unitary Development Plans with Local Development Frameworks (LDFs) and altered the procedures for reviewing planning policies.

3.39
The LDF is a group of documents that will contain the Council's planning policies and guidance. The relevant documents comprise:

- Core Strategy;
- Development Policies;
- Camden Planning Guidance;
- Camden Site Allocations;
- Area Specific Planning Guidance;
- Area Briefs; and
- North London Waste Plan.

3.40
Once adopted, the documents will replace the RUDP. To date the LDF is still emerging: the Camden Draft Core Strategy and Development Policies Document have been submitted to the Secretary of State (January 2010) and the EIP occurred between May and June 2010.The most recent Local Development Scheme (December 2009) schedules the Core Strategy's adoption for November 2010 and the Development Policies in March 2011.

CHAPTER 4.0

ASSESSMENT METHODOLOGY

4.0 Assessment Methodology

4.1
Assessment Methodology
This Sustainability Statement has been structured around the GLA and LBC sustainable development aims and objectives, and demonstrates the sustainability features incorporated into the Proposed Development.

4.2
Specifically, the Proposed Development has been assessed against the following topics:

- Land reuse;
- Location and urban design;
- Adapting to climate change;
- Energy;
- Materials;
- Water;
- Responsible site management;
- Noise;
- Air quality;
- Water quality, flood risk and sustainable urban drainage;
- Microclimate;
- Indoor comfort;
- Flexible, inclusive and secure design;
- Open space, natural environment and biodiversity;
- Sustainable waste behaviour;
- Sustainable transport; and
- Economic and social sustainability.

4.3
The following sections detail the sustainability credentials of the Proposed Development, assessed against the above topics.

4.4
Additionally, as required by Camden Planning Guidance (Ref. 24), a BREEAM assessment of the Proposed Development has been undertaken (refer to “Preliminary BREEAM Bespoke 2008 Assessment, 2010” in the Appendix).

4.5
Due to its unique nature, the Proposed Development has been assessed against a BREEAM Bespoke Protocol tailored on the Proposed Development’s characteristics. The BREEAM Bespoke scheme ensures that the set of issues and requirements are appropriate to the functions within the building.

4.6
The preliminary BREEAM assessment details the commitments made by UKCMRI to achieve an ‘Excellent’ rating, and 60% of the energy credits, 40% of the materials credits, and 60% of the water credits (as per LBC BREEAM requirements).

4.7
Consideration has also been given to the feedback provided by the GLA and LBC during various pre-application meetings and as such UKCMRI intends to target all practicable credits to achieve the highest possible BREEAM rating.

4.8
In line with the UKCMRI vision to provide highly sustainable research facilities, the Proposed Development will be continuously re-assessed throughout its development (both at design and procurement stage and construction stage) to improve its BREEAM rating as much as feasible.