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210 Euston Road
London

Planning
Sustainability Statement

Issue 2



Client Name: Wellcome Trust

Client Address: 215 Euston Road, London, NW1 2BE

Property: 210 Euston Road
London

Project Reference: 4199

Issue: 2

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Prepared by: YS

Checked by: JD

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SUMMARY STATEMENT

Watkins Payne Partnership have been commissioned by The Wellcome Trust to produce a statement of sustainability of the proposed refurbishment and seventh floor extension of 210 Euston Road.

Key Measures

This sustainability statement describes how the proposed development will ensure the highest levels of sustainability are attained within the design and construction of 210 Euston Road. The key themes of energy, transport, water, waste, sustainable urban drainage (SuDs), air quality, ecology, noise and light pollution, and finally BREEAM are all addressed.

BREEAM

- It has been deemed suitable by the BREEAM Assessor to assess the commercial office spaces of the project under BREEAM (New Construction) 2014 Offices Assessment. As the offices are to be provided on a Cat A basis a 'Fully Fitted' assessment is applicable. The development scheme could currently attain a minimum score of 55.0%, which translates into Very Good BREEAM (New Construction) 2014 Offices rating.

Energy and CO₂ Reduction

- For full details on energy please refer to the energy strategy prepared by Watkins Payne Partnership that should be read in conjunction with this report. In summary the proposed buildings development has a predicted performance as follows:
 - CO₂ emissions reduction of 37.92 % over the Building Regulations 2013 compliant baseline scheme.
 - The renewable energy technologies of air source heat pumps and PV panels are predicted to achieve a 32.56 % CO₂ reduction.
 - When unregulated uses are taken into account there is a predicted reduction of 16.51% in the development's annual CO₂ emissions.
 - The energy strategy is predicted using the Building Regulations calculation methodologies to achieve an annual carbon emission saving of 5.02 tonnes over the baseline scheme.

Transport

- For full details on transport please refer to the Travel Plan and Transport Assessment prepared by Vectos that should be read in conjunction with this report.
- The TFL Public Transport Access Level (PTAL) for the site is 6b which is the highest level.
- The site will operate as car-free, with no on-site parking provision for employees or visitors.



- Cycle parking will be provided in accordance with the London Plan (2016) cycle parking standards. A total of 207 cycle parking spaces will be provided with 202 long-stay cycle parking spaces to be provided at Basement Level, and 5 accessible parking spaces within the basement.
- The proposals are not forecast to generate any additional car trips due to removal of car parking on-site in preference for more sustainable modes of transport.

Sustainable Urban Drainage (SuDS)

- The proposed green roof will contribute to sustainable urban drainage via evapotranspiration and by absorbing a proportion of surface water to reduce rates of water flow.

Water

- The water efficiency of the office area's water use will result in a calculated water consumption (litres/person/day) of at least 50% improvement over the notional baseline performance of a building. This translates into 4 BREEAM credits for Wat 01 being achieved out of a maximum 5 credits. To achieve the maximum Wat 01 BREEAM New Construction Credits (55% improvement) rainwater harvesting would need to be installed into the design. Due to lack of space and competing needs this is currently not achievable.
- As part of the Office BREEAM requirements a compliant leak detection system which is capable of detecting a major leak water on the mains water supply within the building and utilities water meter will be installed.
- Flow control devices that regulate the supply of water to each WC area/facility according to demand will be installed (and therefore minimise water leaks and wastage from sanitary fittings).
- All incoming retail tenants will be encouraged to also use water efficient equipment and fittings in their fit-out.
- All retail units and individual office tenant areas will be separately metered.
- The site will be registered under the Considerate Constructors Scheme and will be required to monitor their onsite water consumption during construction.

Waste

- Recycling of waste generated during occupation shall be encouraged through the provision of dedicated on-site waste storage and recycling facilities, sized and located in accordance with the BREEAM requirements.
- During detailed design, any opportunity to maximise the potential to use pre-fabricated elements will be considered.



Air Quality

- For full details on Air Quality please refer to the Air Quality Assessment prepared by Air Quality Consultant Ltd that should be read in conjunction with this report.
- The report confirms that the impacts of the proposed energy plant will not significantly affect air quality and thus, the overall operational effects of the proposed development are judged to be 'not significant'.
- The development is not expected to lead to a significant increase in traffic and will therefore not significantly affect air quality at existing properties along the local road network.

Ecology

- An extensive green roof is currently proposed and it will give a boost to the local ecology by providing a habitat to support a variety of plants, birds, animals and invertebrates.
- The two available BREEAM credits for LE 03 - Minimising Impact on Existing Site Ecology are targeted. This will require a Suitably Qualified Ecologist to be appointed to provide an Ecology Report based on their site survey confirming the change in the ecological value of the site as a result of development is equal to or greater than zero plant species, i.e. no negative change. In addition, credits for BREEAM LE 04 Enhancing Site Ecology and LE 05 Long Term Impact on Biodiversity are being targeted.

Noise Pollution

- An Environmental Noise Survey and Plant Noise Assessment has been carried out by Hann Tucker and should be read in conjunction with this report.
- The report is based on the noise data from the proposed external plant (22No. condenser units, 2No. air handling units (AHUs 1&2), 1No. smoke extract fan and 2No. WC extract fans) and details a range of mitigation measures, including acoustic screening and attenuators.
- The Local Authority requirements will be met with the adoption of the proposed acoustic mitigating measures.

Light Pollution

- All external lighting will be energy efficient using daylight controls, time controls and occupancy detection to minimise inappropriate use.
- External lighting luminaires will be selected with suitable light output ratios and distribution arrangements to minimise light lost to the sky.
- In addition, the average initial luminous efficacy of the external light fittings within the construction zone is not less than 60 luminaire lumens per circuit Watt.



1.00 INTRODUCTION

1.01 Application

This report has been prepared on behalf of The Wellcome Trust for the development of the site 210 Euston Road.

1.02 Existing Buildings

The existing building comprises a 6 storey building with plant at 7th floor, plus lower ground and basement, post-modern office building dating from the late 1980s and is due to become vacant by the end of 2018. The Site fronts onto Euston Road, an important east-west transport route, and is located between Euston Mainline Rail Station and Euston Square Underground station.

1.03 Proposed Development

The planning application seeks full planning permission for:

“Refurbishment and single storey extension to the existing office building (Class B1) and the provision of flexible retail and leisure floorspace (Classes A1/D2) on the ground and lower floors, with associated plant, cycle facilities and storage.”

1.04 Purpose

The aim of this sustainability statement is to demonstrate how the relevant planning policies that address sustainability have been addressed.

This statement is structured as follows:

- **Section 1** - an introduction to the site and the buildings
- **Section 2** - a description of the main policies and drivers for sustainability relevant to the application
- **Section 3** - a review against the Mayors SPG on Sustainable Design and Construction in addition to the Camden Local Plan (2017).

1.05 Reservation

This report has been prepared solely for the use of the Wellcome Trust and Watkins Payne Partnership accept no responsibility for its use by any third parties.



2.00 POLICY REVIEW

This section of the report is a review of all the planning policy documents that are applicable to the development as follows:

- National Planning Policy Framework (NPPF)
- The London Plan (2016)
- Camden Local Plan (2017)

2.01 National Policy

The National Planning Policy Framework (NPPF) provides the planning policies for England and how these policies should be applied. Whilst sustainable development is not the sole aim of the NPPF, it remains a main theme throughout and provides the context for sustainable development.

2.02 London Plan 2016

The London Plan sets out the Mayor's vision for London. In accordance with the NPPF, it promotes economic development, and endorses the principles of sustainable development. It is the main driver for strategic decision-making on London's development, including development decisions. The current London Plan was adopted in March 2016 and includes a number of policies associated with a developments sustainable design:

- Policy 5.1 Climate change mitigation;
- Policy 5.2 Minimising carbon dioxide emissions;
- Policy 5.3 Sustainable design and construction;
- Policy 5.6 Decentralised energy in development proposals;
- Policy 5.7 Renewable energy;
- Policy 5.9 Overheating and cooling;
- Policy 5.10 Urban greening;
- Policy 5.11 Green roofs and development site environs;
- Policy 5.12 Flood risk management;
- Policy 5.15 Water use and supplies, and
- Policy 7.2 An inclusive environment.

The new Draft London plan has also been reviewed and considered where relevant however as the 2016 London Plan is the current adopted plan this has been the focus of this statement.

2.03 Supplementary Planning Guidance

The Mayor produces SPGs to provide further guidance on policies in the London Plan that can't be addressed in sufficient detail in the plan itself. The Mayor of London Published its Sustainable Designed Construction SPG in April 2014. The SPG provides guidance on the implementation of London Plan policies listed above and so addresses matters relating to environmental sustainability.



SPG's cannot be used to create new policies, but they explain how policies in the London Plan should be carried through into action. It will be a material planning consideration when determining planning applications.

2.04 Camden Local Plan 2017

The Camden Local Plan (2017) sets out the Council's planning policies:

The Key Policies are:

- CC1 Climate Change Mitigation
- CC2 Adapting to climate change
- CC3 Water and flooding
- CC4 Air Quality
- CC5 Waste



3.00 SUSTAINABILITY METHODOLOGY

The Mayor of London’s Supplementary Planning Guidance (SPG) on Sustainable Design and Construction (2014) provides guidance on how to implement the London Plan (2016). The sustainability statement will use the Mayor’s Priorities and Best Practices as outlined in the SPG as a framework for showing compliance. In addition, where relevant the Camden Local Plan is addressed.

Statement Key

| Box Colour | Colour Coding explained |
|------------|-------------------------|
| | London Plan Policy |

The compliance of the development is noted using the following colour coding system in the fourth column.

| Compliance Status | Colour Coding explained |
|-------------------|--|
| | Compliant / Achieved policy requirements |
| | Not achieved due to constraints |
| | Not compliant |
| | Not applicable to the development |



| Optimising the use of the land | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|--------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| Through both their Local Plans and planning decisions, boroughs should aim for 100% of development to be delivered on previously developed land. | 1.1, 3.3 | G1 | | 100% of the proposed development will be delivered on previously occupied land. |
| Mayor's Priority | London Plan policy | | | |
| Developers should optimise the scale and density of their development, considering the local context, to make efficient use of London's limited land. | 3.4, 4.3, 7.6 | G1 | | The proposal is to incorporate a seventh-floor extension and thus makes use of London's limited land. |

| Basement and lightwells | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---|-------------------|-------------------|---|
| Mayor's best practice | London Plan policy | | | |
| Where there is pressure for basement developments, boroughs should consider whether there are any particular local geological or hydrological issues that could particularly effect their construction, and adopt appropriate policies to address any local conditions. | 3.5, 5.12, 5.13, 5.14, 7.13, 7.19, 7.21 | A5 | | There will be no change to the basement's GEA |
| Mayor's Priority | London Plan policy | | | |
| When planning a basement development, developers should consider the geological and hydrological conditions of the site and surrounding area, proportionate to the local conditions, the size of the basement and lightwell and the sensitivity of adjoining buildings and uses, including green infrastructure. | 5.12, 5.13, 7.13, 7.19 | A5 | | There will be no change to the basement's GEA |
| When planning and constructing a basement development, developers should consider the amenity of neighbours. | 5.3, 5.18, 6.3, 7.14, 7.15 | | | |



| Local food growing | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| To protect existing established food growing spaces. | 2.18, 3.2, 5.3, 5.10, 5.11, 7.18, 7.22. | N/A | | Due to competing needs of space for the plant and living roof, food growing spaces are not being incorporated into the design. |
| Mayor's best practice | London Plan policy | | | |
| To provide space for individual or communal food growing, where possible and appropriate. | 2.18, 3.2, 5.3, 5.10, 5.11, 5.21, 7.18, 7.22. | N/A | | Due to competing needs of space for the plant and living roof, food growing spaces are not being incorporated into the design. |
| Mayor's best practice | London Plan policy | | | |
| To take advantage of existing spaces to grow food, including adapting temporary spaces for food growing. | 2.18, 3.2, 5.3, 5.10, 5.11, 5.21, 7.18, 7.22. | N/A | | Due to competing needs of space for the plant and living roof, food growing spaces are not being incorporated into the design. |



| Site layout and building design | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|--|
| Mayor's best practice | London Plan policy | | | |
| Any existing buildings that can be practically refurbished, retrofitted, altered, or extended should be retained and reused. | 5.3, 5.4 | CC1 | | The existing building is being refurbished with a seventh floor extension. |
| Mayor's best practice | London Plan policy | | | |
| A mix of uses, where suitable should be included to provide a range of services commensurate to the public transport accessibility. | 4.3, 6.1 | G1 | | <p>PTAL is a theoretical measure of public transport accessibility from a given location within London. PTAL is categorised in to 6 levels, 1a to 6b where 6b represents a high level of accessibility and 1 a low level of accessibility.</p> <p>The site achieves a PTAL score of 6b (Excellent) through its proximity to a multitude of bus services in addition to Underground and Rail services.</p> <p>The addition to the prime office refurbishment the ground floor retail space, will be an asset to the building and local environment. Finally, the current basement will no longer provide parking but will provide a generously planned cycle store, shower facility and locker space.</p> |



| Site layout and building design | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|--|------------------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| <p>The design of the site and building layout, footprint, scale and height of buildings as well as the location of land uses should consider:</p> <ul style="list-style-type: none"> Existing features the possible retention and reuse of existing buildings and structures; and The retention of existing green infrastructure, including trees and other ecological features, and potential for its improvement and extension; Access routes to public transport and other facilities that minimise the use of private transport; New design of development the existing landform; the potential to take advantage of natural systems such as wind, sun and shading; The principles set out London Plan policies 7.1 and 7.6; as follows: <ul style="list-style-type: none"> the potential for adaption and reuse in the future; potential for incorporating green infrastructure, including enhancing biodiversity; potential for incorporating open space, recreation space, child play space; energy demands and the ability to take advantage of natural systems and low and zero carbon energy sources; site wide infrastructure; access to low carbon transport modes; the promotion of low carbon transport modes, including walking and cycling; potential to address any local air quality, noise disturbance, flooding and land contamination issues; and the potential effect on the micro-climate. | <p>2.18, 5.2, 5.3, 5.4, 5.6, 5.7, 5.9, 5.10, 5.11, 5.12, 5.13, 5.16, 5.18, 5.21, 6.1, 6.7, 6.9, 6.10, 6.11, 6.13, 7.1, 7.6, 7.14, 7.15, 7.18, 7.19, 7.21, 7.22</p> | <p>G1, A1, CC1, CC4, CC5</p> | | <p>These topics are covered in further detail throughout this matrix and in the TateHindle Design and Access Statement which should be read in conjunction with this report.</p> |



| Energy and carbon dioxide emissions | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| <p>The overall carbon dioxide emissions from a development should be minimised through the implementation of the energy hierarchy set out in London Plan policy 5.2.</p> | 5.2, 5.3 | CC1 | | <p>The proposed development has been assessed in line with the London plan policies and guidance documentation. The target CO₂ emissions applicable to the development is 35% improvement for commercial uses over Building Regulations Part L 2013.</p> <p>The energy hierarchy used is:</p> <ol style="list-style-type: none"> 1 Be lean: use less energy 2 Be clean: supply energy efficiently 3 Be green: use renewable energy <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> |
| Mayor's Priority | London Plan policy | | | |
| <p>Developments should be designed to meet the following Regulated carbon dioxide standards, in line with London Plan policy 5.2.</p> | 5.2 | CC1 | | <p>The proposed development has been assessed in line with the London plan policies and guidance documentation. The target CO₂ emissions applicable to the development is 35% improvement for commercial uses over Building Regulations Part L 2013.</p> <p>The renewable energy technologies of air source heat pumps and PV panels are predicted to achieve a 32.56 % CO₂ reduction.</p> <p>Overall there is an anticipated CO₂ emissions reduction of 37.92 % over the Building Regulations 2013 compliant baseline scheme.</p> <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> |



| Energy and carbon dioxide emissions continued | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|-------------------------------|-------------------|-------------------|---|
| Mayor's best practice | London Plan policy | | | |
| Developments should contribute to ensuring resilient energy infrastructure and a reliable energy supply, including from local low and zero carbon sources. | 5.1, 5.5, 5.6, 5.7, 5.8, 5.17 | CC1 | | <p>The Energy Strategy details the feasibility assessment carried out into alternative low and zero carbon solutions. This concluded that the most appropriate renewable technologies for this scheme are:</p> <ul style="list-style-type: none"> • Photovoltaic cells to provide a contribution to the electrical demand for the offices • Variable refrigerant flow (VRF) air source heat pumps to provide the heating and cooling requirements of the office areas <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> |
| Mayor's best practice | London Plan policy | | | |
| Developers are encouraged to include innovative low and zero carbon technologies to minimise carbon dioxide emissions within developments and keep up to date with rapidly improving technologies. | 5.2, 5.17 | CC1 | | <p>Please refer to the Energy Strategy submitted as part of the application for further details which includes an extensive LZC Analysis.</p> |

| Energy demand assessment | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| Development applications are to be accompanied by an energy demand assessment | 5.2 | CC1 | | <p>The energy demand assessment is contained in the Energy Strategy document. This identifies energy demand reduction through adopting passive and low energy measures that show an estimate 5.36% improvement over the baseline Building Regulations Part L 2013 level. Then further reductions will be achieved through the use of photovoltaic panels and air source heat pumps to achieve an estimated overall 37.92% improvement beyond Building Regulations Part L 2013.</p> <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> |



| Use less energy | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| The design of developments should prioritise passive measures. | 5.2, 5.3, 5.9 | CC1, CC2 | | <p>The adopting of passive measures includes high performance glazing, enhanced fabric thermal insulation and low building air leakage that contribute to the estimated 5.36% improvement over the baseline Building Regulations Part L 2013 level.</p> <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> |
| Mayor's best practice | London Plan policy | | | |
| Developers should aim to achieve Part L 2013 Building Regulations requirements through design and energy efficiency alone, as far as is practical. | 5.2, 5.3 | CC1 | | <p>The energy demand assessment contained in the Energy Strategy document lists out the various passive and low energy design measures. This includes high efficiency plant, low energy lighting, variable speed drive fans and pumps and heat recovery that all contribute to the estimated 5.36% improvement over the baseline Building Regulations Part L 2013 level.</p> <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> |



| Efficient energy supply | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|---|--|
| Mayor's Priority | London Plan policy | | | |
| Where borough heat maps have identified district heating opportunities, boroughs should prepare more detailed Energy Master Plans (EMPs) to establish the extent of market competitive district heating networks. | 5.5, 5.6 | CC1 | | <p>The London Heat Map has been reviewed and there is a suitable decentralised energy scheme (DES) available to be connected within the vicinity of the development. However, the offices have low heating demand compared to cooling and the domestic hot water usage is generally low for the office usage. The district energy network has only heating connection available for the scheme. The absorption chiller is required to provide cooling to the offices which is less efficient compared to the air source heat pump with variable refrigerant flow (VRF) system. The air source heat pump system with variable refrigerant flow (VRF) system is proposed for the scheme due to the high CO₂ saving.</p> <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> |
| Mayor's Priority | London Plan policy | | | |
| Developers should assess the potential for their development to: <ul style="list-style-type: none"> connect to an existing district heating or cooling network; expand an existing district heating or cooling network, and connect to it; or establish a site wide network, and enable the connection of existing buildings in the vicinity of the development. | 5.5, 5.6 | CC1 | <p>As above</p> <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> | |
| Mayor's Priority | London Plan policy | | | |
| Where opportunities arise, developers generating energy or waste heat should maximise long term carbon dioxide savings by feeding the decentralised energy network with low or zero carbon hot, and where required, cold water. | 5.5, 5.6 | CC1 | | <p>The domestic hot water service (HWS) requirement to the building is relatively low due to its primary office use along with the relatively low heating demand due to the nature of anticipated office tenants in the development location. Hence the use of a CHP plant is not considered to be a viable technology for this development.</p> <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> |



| Renewable energy | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| Major developments should incorporate renewable energy technologies to minimise overall carbon dioxide emissions, where feasible. | 5.7 | CC1, CC2 | | <p>The Energy Strategy details the feasibility assessment carried out into alternative renewables solutions. This concluded that the most appropriate renewable technologies for this scheme are photovoltaic (PV) panels at roof level which will contribute to meeting some of the energy demand of the development.</p> <p>The retail units found at ground floor level of in the Riverside buildings will utilise air source heat pumps to meet their heating and cooling demand.</p> <p>The renewables show an estimated 6.6% improvement in carbon emissions when compared to the development with just the passive and low energy features plus CHP plant.</p> <p>Please refer to the Energy Strategy submitted as part of the application for further details.</p> |

| Carbon dioxide off-setting | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| Where developments do not achieve the Mayor's carbon dioxide reduction targets set out in London Plan policy 5.2, the developer should make a contribution to the local borough's carbon dioxide off-setting fund. | 5.2, 5.4 | CC1 | | <p>The overall development is estimated to achieve carbon emission improvement of 23.7% beyond Building Regulations Part L 2013 with the shortfall equating to 464 tonnes CO₂ per annum.</p> <p>Please refer to the Energy Strategy submitted as part of the application for further details of the offset payment.</p> |

| Retrofitting | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| Where works to existing developments are proposed developers should retrofit carbon dioxide and water saving measures. | 5.4, 5.15 | CC3 | | The proposed development does not contain any refurbishment works or works to existing buildings therefore retrofitting is not applicable. |



| Monitoring energy use | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|---|
| Mayor's best practice | London Plan policy | | | |
| Developers are encouraged to incorporate monitoring equipment, and systems where appropriate to enable occupiers to monitor and reduce their energy use. | 5.2, 5.3 | N/A | | Each commercial space will be separately metered. The development will be provided with a central energy management and metering system which will record and monitor energy usage from the main items of plant and for each tenant. |

| Supporting a resilient energy supply | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|--|
| Mayor's best practice | London Plan policy | | | |
| Developers are encouraged to incorporate equipment that would enable their schemes to participate in demand side response opportunities. | 5.2, 5.3 | N/A | | This will be reviewed as part of the detailed equipment procurement process as the project develops. |



| Water efficiency | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development | | | | | | | | | | | | | | | | | | | | | | | | | | | |
|--|-----------------------------|-------------------|-------------------|---|------------------|--------------------------|-----------------|----------|------------------------|----|------------|------------------------|----|------------|------------------------|---|--------------------------------|------------------------|----|--------------------------|-----------------------------|----|-------------|-----------------------------|----|-------------|-------------------|----|--|-----------------------------|-----|
| Mayor's Priority | London Plan policy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Developers should maximise the opportunities for water saving measures and appliances in all developments, including the reuse and using alternative sources of water. | 5.3, 5.13, 5.15 | CC3 | | The proposed development will utilise water efficient fittings and appliances. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mayor's Priority | London Plan policy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Developers should design residential schemes to meet a water consumption rate of 105 litres or less per person per day. | 5.3, 5.15 | CC3 | | The residential developments will be designed to meet a water consumption rate of 105 litres or less per person per day. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mayor's Priority | London Plan policy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| New non-residential developments, including refurbishments, should aim to achieve the maximum number of water credits in a BREEAM assessment or the 'best practice' level of the AECB (Association of Environment Conscious Building) water standards. | 5.3, 5.15 | CC3 | | <p>Please see below for a proposed sanitary ware specification to achieve the targeted 4 no. of BREEAM Wat 01 credits and give a 51.95% improvement in the water consumption (litres/person/day) over the baseline performance.</p> <table border="1"> <thead> <tr> <th>Sanitary Fitting</th> <th>Flush Volume / Flow Rate</th> <th>No. of Fittings</th> </tr> </thead> <tbody> <tr> <td>Male WCs</td> <td>4 / 2 litre dual flush</td> <td>23</td> </tr> <tr> <td>Female WCs</td> <td>4 / 2 litre dual flush</td> <td>37</td> </tr> <tr> <td>Unisex WCs</td> <td>4 / 2 litre dual flush</td> <td>4</td> </tr> <tr> <td>Unisex/Disabled/Accessible WCs</td> <td>4.5 litre single flush</td> <td>10</td> </tr> <tr> <td>All wash hand basin taps</td> <td>4 litres/min flow regulated</td> <td>78</td> </tr> <tr> <td>All showers</td> <td>9 litres/min flow regulated</td> <td>17</td> </tr> <tr> <td>All urinals</td> <td>1.5 max per flush</td> <td>14</td> </tr> <tr> <td>Kitchenette taps (including capped off provision for tenant fit-out)</td> <td>4 litres/min flow regulated</td> <td>N/A</td> </tr> </tbody> </table> <p>Achieving 5/5 Wat 01 BREEAM New Construction Credits (55% improvement) is not realistic without rainwater harvesting. Whilst rainwater harvesting has been considered it is not achievable due to the competing needs for space.</p> | Sanitary Fitting | Flush Volume / Flow Rate | No. of Fittings | Male WCs | 4 / 2 litre dual flush | 23 | Female WCs | 4 / 2 litre dual flush | 37 | Unisex WCs | 4 / 2 litre dual flush | 4 | Unisex/Disabled/Accessible WCs | 4.5 litre single flush | 10 | All wash hand basin taps | 4 litres/min flow regulated | 78 | All showers | 9 litres/min flow regulated | 17 | All urinals | 1.5 max per flush | 14 | Kitchenette taps (including capped off provision for tenant fit-out) | 4 litres/min flow regulated | N/A |
| Sanitary Fitting | Flush Volume / Flow Rate | No. of Fittings | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Male WCs | 4 / 2 litre dual flush | 23 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Female WCs | 4 / 2 litre dual flush | 37 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Unisex WCs | 4 / 2 litre dual flush | 4 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Unisex/Disabled/Accessible WCs | 4.5 litre single flush | 10 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| All wash hand basin taps | 4 litres/min flow regulated | 78 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| All showers | 9 litres/min flow regulated | 17 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| All urinals | 1.5 max per flush | 14 | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Kitchenette taps (including capped off provision for tenant fit-out) | 4 litres/min flow regulated | N/A | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mayor's Priority | London Plan policy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Where a building is to be retained, water efficiency measures should be retrofitted. | 5.3, 5.4, 5.15 | CC3 | | As above | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mayor's Priority | London Plan policy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| All developments should be designed to incorporate rainwater harvesting. | 5.3, 5.13, 5.15 | N/A | | Rainwater harvesting has been considered but due to space constraints and competing needs this is not feasible. | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| Mayor's Best Practice | London Plan policy | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
| All residential units, including individual flats / apartments and commercial units, and where practical, individual leases in large commercial properties should be metered. | 5.15 | N/A | | All commercial units will be separately metered. | | | | | | | | | | | | | | | | | | | | | | | | | | | |



| Materials and waste: Design Phase | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|----------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| <p>The design of development should prioritise materials that:</p> <ul style="list-style-type: none"> • have a low embodied energy, including those that can be re-used intact or recycled; • at least three of the key elements of the building envelope (external walls, windows roof, upper floor slabs, internal walls, floor finishes / coverings) are to achieve a rating of A+ to D in the BRE's <i>The Green Guide</i> of specification; • can be sustainably sourced; • at least 50% of timber and timber products should be sourced from accredited Forest Stewardship Council (FSC) or Programme for the Endorsement of forestry Certification (PEFC) source; • are durable to cater for their level of use and exposure; and • will not release toxins into the internal and external environment, including those that deplete stratospheric ozone | 5.3, 5.17, 5.20, 7.6, 7.14 | N/A | | <p>The project target is that 100% of timber will be FSC certified. It is a minimum requirement for achieving a BREEAM rating (for any rating level) that this is complied with.</p> <p>Materials have been prioritised that meet the following requirements:</p> <ul style="list-style-type: none"> • at least three of the key elements of the building envelope (external walls, windows roof, upper floor slabs, internal walls, floor finishes / coverings) are to achieve a rating of A+ to D in the BRE's <i>The Green Guide</i> of specification; • can be sustainably sourced; • are durable to cater for their level of use and exposure; and • will not release toxins into the internal and external environment, including those that deplete stratospheric ozone |
| Mayor's Best Practice | London Plan Policy | | | |
| The design of developments should maximise the potential to use pre-fabrication elements. | 5.3, 7.6 | N/A | | During detailed design, any opportunity to maximise the potential to use pre-fabricated elements will be considered |

| Materials and Waste: Construction phase | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan Policy | | | |
| Developers should maximise the use of existing resources and materials and minimise waste generated during the demolition and construction process through the implementation of the waste hierarchy. | 5.3, 5.17, 5.20 | CC5 | | The site will be registered with the National Considerate Construction Scheme (CCS). In addition, a site waste management plan will be produced. |



| Materials and Waste: Occupation phase | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan Policy | | | |
| Developers should provide sufficient internal space for the storage of recyclable and compostable materials and waste in their schemes. | 5.3, 5.17 | CC5 | | <p>The waste management strategy for the building will be as per the existing, i.e. managed by a commercial waste contractor.</p> <p>The new waste store is to be located at lower ground level with adequate space for 5no. 660L Euro bins and 3no.1100L Euro bins. Additionally, a dedicated recycling area is located in the same room with 2no. 360L Euro bins and 4no. 660L Euro bins.</p> <p>For more information please refer to the waste sections of the Design and Access Statement.</p> |
| Mayor's Priority | London Plan Policy | | | |
| The design of development should meet borough requirements for the size and location of recycling, composting and refuse storage and its removal. | 5.3, 5.17 | CC5 | | The development incorporates waste storage within each block which has been sufficiently sized in accordance with council standards. |



| Nature conservation and biodiversity | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| There is no net loss in the quality and quantity of biodiversity. | 5.3, 7.19 | A3 | | Overall, the site has been classed by an Ecologist to be of low ecological value and has no features of ecological value that require protection. In addition, it should be noted that a number of the ecology credits for BREEAM purposes are being targeted. This includes Le 03 – Minimising Impact on Existing Site Ecology which requires there to be an increase in plant species equal to or greater than zero (i.e. no negative change). |
| Mayor's Priority | London Plan policy | | | |
| Developers make a contribution to biodiversity on their development site. | 5.3, 7.19 | A3 | | Effort to increase biodiversity include the incorporation of a green roof in line with recommendations made by the Ecologist |

| Climate Change Adaption – Tackling Increased Temperature and Drought | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| Developers should include measures, in the design of their schemes, in line with the cooling hierarchy set out in London Plan Policy 5.9 to prevent over heating over the schemes lifetime. | 5.3, 5.9 | CC1 | | All buildings within the development have been subject to overheating analysis in line with the GLA guidance and the cooling hierarchy follows the principles set out in the London Plan. Please refer to the Energy Strategy submitted as part of the application for further details. |
| Mayor's Best Practice | London Plan policy | | | |
| Heat and Drought Resistant Planting – the design should prioritise landscape planting that is drought resistant and low water demand for supplementary watering. | 5.3, 5.15 | CC2 | | All plant species will be carefully chosen for their ability to withstand periods of heat and drought, to ensure watering will be a requirement only during the establishment period. |
| Mayor's Best Practice | London Plan policy | | | |
| Developers should consider any long-term potential for extreme weather events to affect a building's foundations and to ensure they are robust | 5.3, 7.6 | CC2 | | When selecting materials for the exterior and interior the architects have considered the durability of the products to protect against material degradation for a project climate change scenario. |



| Increasing green cover: Urban Greening | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| Developers should integrate green infrastructure into development schemes, including by creating links with wider green infrastructure network. | 2.18, 5.3, 5.10, 5.11 | A3 | | By incorporating a green roof, the proposed development integrates <i>green infrastructure into scheme, and creates links with a wider green infrastructure network.</i> |
| Mayor's Priority | London Plan policy | | | |
| Major developments in the Central London Activity Area (CAZ) should be designed to contribute to the Mayor's target to increase green cover by 5% in this zone by 2030. | 5.10 | A3 | | The proposed development should contribute to the Mayor's target to increase green cover through the incorporation of a green roof. |

| Increasing green cover: Trees | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| Developments should contribute to the Mayor's target to increase tree cover across London by 5% by 2025. | 5.3, 5.10, 7.21 | A3 | | There are no areas of soft landscaping to incorporate trees but planting will be included through the incorporation of living roofs areas. |
| Mayor's Priority | London Plan policy | | | |
| Any loss of a tree/s resulting from development should be replaced with an appropriate tree or group of trees for the location, with the aim of providing the same canopy cover as that provided by the original tree/s. | 5.3, 5.10, 7.21 | A3 | | There are no existing trees within the red line boundary |



| Surface water flooding and Sustainable drainage | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| When designing their schemes developers should follow the drainage hierarchy set out in London Plan Policy 5.13. | 5.3, 5.12 | CC3 | | It should be noted there is no increase in impermeable area |
| Mayor's Priority | London Plan policy | | | |
| Developments incorporate the recommendation of the TE2100 plan for the future tidal flood risk management in the Thames estuary. | 5.3, 5.12 | CC3 | | Camden is not at risk of flooding from the Thames or any other open rivers and so compliance with the TE2100 plan is not applicable. |
| Mayor's Priority | London Plan policy | | | |
| Where development is permitted in a flood risk zone, appropriate residual risk management measures are to be incorporated into the design to ensure resilience and the safety of occupiers. | 5.3, 5.12 | CC3 | | Camden is not at risk of flooding from the Thames or any other open rivers and is not in a high flood risk zone. |
| Mayor's Priority | London Plan policy | | | |
| All sources of flooding need to be considered when designing and constructing developments. | 3.2, 5.3, 5.21 | CC3 | | The development is located in a Low Risk Flood Zone. |

| Pollution Management: Land contamination | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| Developers should set out how existing land contamination will be addressed prior to the commencement of their development. | 3.2, 5.3, 5.21 | N/A | | There is no existing land contamination |
| Mayor's Priority | London Plan policy | | | |
| Potentially polluting uses are to incorporate suitable mitigation measures. | 3.2, 5.3, 5.21 | N/A | | There is no existing land contamination requiring mitigation |



| Pollution Management: Air quality | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| Developers are to design their schemes so that they are at least 'air quality neutral'. | 7.14 | CC4 | | Only 'major' developments need to be assessed, which are defined in the London Plan as being developments of greater than 1,000 m2 floor space for commercial developments. The proposed development is for less than 1,000 m2 floor space and it is, therefore, not classed as a major development; assessment of the air quality neutrality of the development is thus not required. |

| Pollution Management: Air quality continued | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| Developments should be designed to minimise the generation of air pollution and to mitigate against increased exposure to poor air quality. | 3.2, 5.3, 7.14 | CC4 | | <p>The proposed development incorporates the following good design and best practice measures:</p> <ul style="list-style-type: none"> • installation of ultra-low NOx boilers only, with emission rates below 40 mg/kWh, meeting the requirements of the Sustainable Design and Construction SPG (GLA, 2014a); • running of the boiler flue to 1 m above roof level to ensure the best possible dispersion environment; and • use of exhaust flues for the boilers that discharge vertically upwards, unimpeded by any fixture on top of the stack (e.g. rain cowls), meeting the requirements of the Sustainable Design and Construction SPG (GLA, 2014a). <p>The impact of the proposed development on air quality will be 'not significant'. It is thus not considered appropriate to propose any further mitigation.</p> |
| Mayor's Priority | London Plan policy | | | |
| Developers should select plant that meets the standards for emissions from combined heat and power and biomass plants set out in Appendix 7. | 7.14 | CC4 | | Whilst the exact make, models and energy usage for the development is not known at this stage, compliance will be ensured during detailed design. |
| Mayor's Priority | London Plan policy | | | |
| Developers and contractors should follow the guidance set out in the emerging <i>The Control of Dust and Emissions during Construction and Demolition SPG</i> when constructing their development. | 5.3, 7.14 | CC4 | | The proposed development is less than 1,000 m2 floor space and it is, therefore, not classed as a major development. Only 'major' developments need to prepare a dust risk assessment. |



| Pollution Management: Noise | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| Areas identified as having positive sound features or as being tranquil should be protected from noise. | 3.2, 7.15 | A4 | | There are no areas identified which have positive sound features and require protection. |
| Mayor's Priority | London Plan policy | | | |
| Noise should be reduced at source, and then designed out of a scheme to reduce the need for mitigation measures. | 3.2, 5.3, 7.6, 7.15 | A4 | | A suitably qualified noise consultant has recommended plant noise emission criteria have been recommended and a preliminary plant noise emission limit has been set. For more information please refer to the Environmental Noise Survey Report produced by Hann Tucker Associates. |

| Pollution Management: Light pollution | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| Developments and lighting schemes should be designed to minimise light pollution. | 5.2, 5.3, 6.7 | D4 | | All external lighting will be energy efficient using daylight controls, time controls and occupancy detection to minimise inappropriate use. External lighting luminaires will be selected with suitable light output ratios and distribution arrangements to minimise light lost to the sky. |



| Pollution Management: Water pollution | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|--|---------------------------|-------------------|-------------------|---|
| Mayor's Priority | London Plan policy | | | |
| In their aim to achieve a greenfield runoff rate developers should incorporate sustainable urban drainage systems (SuDS) into their schemes which also provide benefits for water quality. | 5.3, 5.13, 5.14 | CC3 | | There will be no increase to the impermeable area. SuDS are incorporated into the design in the form of a green roof areas which will reduce infiltration rates. |
| Mayor's best practice | London Plan policy | | | |
| Encourage good environmental practice to help reduce the risk from business activities on the London water environment. | 5.3, 5.13, 5.14 | N/A | | Building User Guides will be produced for the commercial and office developments for BREEAM purposes. As outlined in the BREEAM manual this will include Overview of the building and its environmental strategy, e.g. energy/water/waste efficiency policy/strategy and how users should engage with/deliver the policy/strategy. Building services overview and access to controls, e.g. where to find them, what they control, how to operate effectively and efficiently etc. |
| Mayor's best practice | London Plan policy | | | |
| Encourage those working on demolition and construction sites to prevent pollution by incorporating prevention measures and following best practice. | 5.3, 5.14 | N/A | | It is intended that the site will be registered under the Considerate Constructors Scheme and achieve a minimum score of 35. In addition, it is expected the main contractor will operate under best practice to prevent water pollution. |

| Wastewater treatment | London Plan Requirements | Camden Local Plan | Compliance Status | Review of proposed development |
|---|---------------------------|-------------------|-------------------|--|
| Mayor's Priority | London Plan policy | | | |
| Commercial developments discharging trade effluent should connect to the public foul sewer or combined sewer network where it is reasonable to do so subject to a trade effluent consent from the relevant sewerage undertaker. | 5.3, 5.14 | N/A | | As aspects of the development will discharge to the public sewer network as appropriate. |
| Mayor's Priority | London Plan policy | | | |
| Developments should be properly connected and post-construction checks should be made by developers to ensure that mis-connections do not occur. | 5.3, 5.14 | N/A | | All connections will be checked using CCTV survey techniques to see they are connected properly. |