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KINGS CROSS METHODIST CHURCH
SUSTAINABILITY STATEMENT

RAMBOLL

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SUSTAINABILITY STATEMENT

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WHAT IS THIS SUSTAINABILITY STATEMENT FOR?

Ramboll Environ UK Ltd (Ramboll Environ) has been commissioned by West London Mission to prepare a Sustainability Statement to accompany a Full Planning Application for King's Cross Methodist Church, London Borough of Camden (the 'Proposed Development') as a requirement of Camden's planning guidance.

The purpose of this Sustainability Statement is to provide details of how the redevelopment proposals have integrated sustainable design and construction principles and to demonstrate how the requirements of national, regional and local policies will be met.

The Proposed Development will be constructed to the current Building Regulations which govern the standards the Proposed Development will have to meet. Further requirements are set out in The National Planning Policy Framework, which outlines the Government's planning requirements. These national planning requirements are transposed at a regional and local level to reflect the needs and priorities of specific communities. Within the London Borough of Camden, consideration has been given to the development plan which comprises the London Plan (2015), the Core Strategy (2010) and the Development Policies (2010) together with other material considerations including relevant supplementary planning documents.

The Proposed Development's performance against industry best practice and standards such as BREEAM New Construction have also been referred to as appropriate. A broad range of sustainability issues (environmental, social and economic) have been considered across the full lifecycle of the Proposed Development including design, construction and operation.

1. EXECUTIVE SUMMARY

Following the application submitted in 2015 (ref: 2015/7013/P), the proposed scheme has been revised to address design and heritage comments from LB Camden planning officers. This Sustainability Statement has been updated to reflect the design and layouts variations to the proposals.

This Sustainability Statement is submitted in support of the redevelopment proposals for a Site located at King's Cross Methodist Church within the London Borough of Camden (LB Camden) and covers an area of 744m^2. The proposals comprise the demolition of the existing building on-site to be replaced by a new Church and associated facilities, along with residential apartments for lease hold.

The purpose of this Sustainability Statement is to provide an independent verification that the Proposed Development accords with relevant planning policies, and is an example of good practice in sustainable design informed by industry guidance. In line with planning guidance and Camden Core strategy CS13, Development Policy DP22 and Camden planning Guidance CPG3. The Proposed Development is considered to contribute positively and incorporates the ethos of sustainable development by:

- Meeting the planning policy objectives of relevance to the Proposed Development with relation to sustainable development, as contained within LB Camden's Core Strategy 2010, Development Policies 2010, Camden Planning Guidance 3: Sustainability 2015, following the London Plan 2015 and the Mayor's Sustainable Design and Construction Supplementary Planning Guidance 2014;
- Addressing key issues relating to energy, water resources, sustainable use of materials, transport, climate change adaptation, biodiversity, wellbeing and socio-economic during the design, construction and operation of the Proposed Development, as found in Camden's planning guidance and development policies; including a site-wide 33% reduction in CO_2 emissions against Building Regulations Part L 2013;
- Targeting a BREEAM 'Very Good' rating under the BREEAM 2014 New Construction Multi-residential for the subsidised community members accommodation spaces on-site (with additional credits identified to demonstrate what would be required to achieve an 'Excellent' rating); and
- Redevelopment of an out of date church and facilities which are becoming unfit for purpose and has a very high estimated future maintenance cost, to be replaced with a combination of a new church with community facilities, onsite Manse, subsidised community accommodation, and residential apartments.

The Sustainability Statement demonstrates that there is a clear commitment to sustainable development principles within the Proposed Development, as well as contributing positively to the sustainability objectives and performing well against planning policies.

2. SITE DESCRIPTION

2.1 Site Details

The Site is the King's Cross Methodist Church located at 58a Birkenhead Street in Camden, Figure 1.1 (to the south of King's Cross Railway Station), and covers an area of approximately 744 m^2 (at ground level) as shown in Figure 1.1.

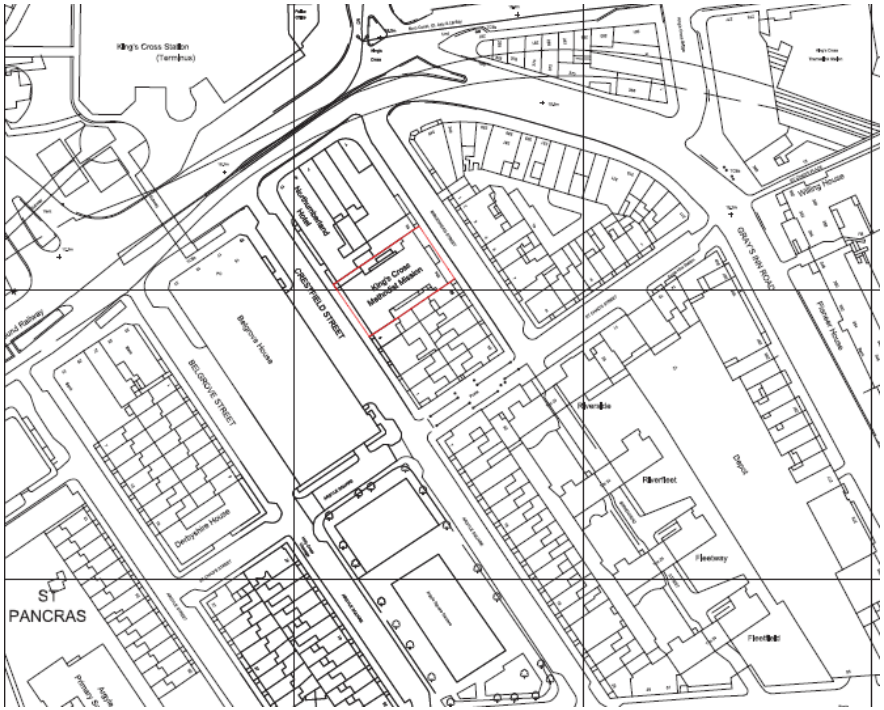


Figure 1: Site Location

The Site lies within an urbanised and developed context comprising a mix of predominantly residential, hotel and commercial uses. The Site has frontages onto both Birkenhead Street and Crestfield Street and is bound by 4 to 5 storey Victorian era residential buildings to the south. To the north there is a combination of hotels and commercial buildings. Due to the Site's location within a heavily urbanised area, the nearest sensitive receptors which comprise residential, hotel and commercial units which are located directly adjacent to the site.

The Site currently comprises a Methodist Church originally dating back to the 1820s; since which a number of additions and alterations have occurred to form the collection of buildings as is presently found, with little original features remaining. The current collection of buildings offers a combination of uses: a church, associated community spaces and accommodation for 25 students and one visitor. However, little work has been done since the 1970's and the current facilities are becoming unfit for purpose and have a very high estimated future maintenance costs over the next 20 years. As such the Church and West London Mission (WLM) Circuit wish to update the facilities to enable the continuation, and growth, of their work within the community.

2.2 Project Description

The Church and associated facilities are a unique combination of the multiple uses and activities the WLM undertakes. When compared to other building designs, this variety of facilities requires careful design compromises to achieve the maximum value, in terms of facilities, for the Church and its congregation. This is compounded by the restricted size and layout of the site. Furthermore, this development is also occurring in a conservation area with specific character and heritage design considerations.

Due to the unique nature of the Church and its ancillary rooms, and following discussions with the Sustainability Officer (planning), it was not deemed feasible to achieve a BREEAM assessment for this part of the development due to the restrictions and contradictory ambitions for its use. The Church also provides community and sustainability objectives which are outside the scope of formal assessment, and therefore would be missed in an assessment. As a consequence the BREEAM assessment focuses on the supported accommodation area of the development.

A continuation of the current situation has been deemed financially unsustainable by the WLM. The alternative options to redevelopment on site would result in the loss of the Church and associated community work and facilities. It is deemed that this would have significant negative effects for its congregation and users within the wider community.

Furthermore the WLM are a registered charity, without large financial reserves. They are funding the development through the sale of the residential apartments, this creates a tight financial situation where the optimal cost to benefit has to be considered. The design has been carefully considered to achieve the maximum benefit in terms of Church and community space for the required area of apartments to fund the project. Due to the size and type of development the challenge, and therefore added expense, in achieving a BREEAM Excellent rating is viewed as potentially inhibitory to the development, and if so would contribute to the loss of the Church and its associated community benefits. Nonetheless, and in line with Camden's Development Policy DP22 and Planning Guidance CPG3, additional credits have been identified in the BREEAM Pre-Assessment Report to demonstrate what would be required to achieve an 'Excellent' rating.

Overall there has been careful consideration of the development as a whole and the compromises required to achieve the multiple ambitions of the Proposed Development. In producing this sustainability statement, the wider sustainability services offered through the Church and it facilities should be considered alongside the more formal sustainability issues.

Careful consideration of the development options by the Kings Cross Redevelopment Working Group were undertaken, which included: continuing as normal, repair then maintain and demolition and redevelop. The most cost effective option, which will provide the required facilities that the Church and WLM require and is economically feasible, is the proposed demolition and redevelopment of the site. The Proposed Development involves the demolition of all of the existing building on Site and the construction of a new church, community spaces and subsidised accommodation which are fit for purpose; funded by the creation and sale of residential apartments. The Proposed Development would compromise:

- Church and community facilities, including: multi-purpose meeting hall, a Chapel, meeting rooms and offices, areas for charity groups, kitchens, children and family rooms, toilets and washing facilities, administration areas and storage areas;
- Methodist Chaplaincy House: a 26 person subsidised accommodation (25 students and one visitor's room) with individual en-suite rooms, visitors area, kitchen, dining areas, works spaces, laundry, cycle storage, communal areas and a warden flat or 'Manse'; and
- 11 lease hold apartments of one and two-bedroom apartments.

The main Church entrance would still be located off Birkenhead Street, while the centre of the development will incorporate an open courtyard providing light and space. The construction of a basement will create the required extra space without increasing the building height. See design cross section in figure 2 and proposed massing in figure 3.

The Proposed Development thereby meets the requirements for an up-to-date Church and associated facilities, while being financially viable through the sale of apartments. This mixed development allows the continuation of church services for the local and wider community, in addition to creating additional private housing in the Borough.

Figure2: Proposed design cross section

Figure 3: Proposed massing, Crestfield Street

2.3 Project Developer Profile – West London Mission

The West London Mission (WLM) is a Circuit of the Methodist Church, with two London churches. Alongside Methodist traditional worship the WLM also undertake a variety of charitable and social projects through the Church's and Circuit mission projects.

West London Mission has an inclusive Christian ethos, as part of this WLM is committed to ensuring a high standard of environmental and sustainable performance within the design, project management and construction of this project. WLM will strive to achieve a BREEAM 'Very Good' for the corresponding areas of the development.

The WLM is keen for the development to offer the greatest potential benefits for the Church and its community work through continuing to offer the same functions as present, with the potential for growth into new and additional services for the local and wider community.

The design has been carefully considered to offer an efficient use of the space, while providing new residential accommodation in a desirable location, without impacting on the availability of open or green space in the area. The Proposed Development aims to complement the local character of the area while enhancing the external appearance of the current church buildings, in fitting with the wider regeneration in the area.

To ensure that the highest standards of sustainability are met in their schemes, WLM is actively engaged with their design team, to ensure that sustainability issues are considered from the outset. During construction, WLM will ensure the Main Contractor follows best practice, which includes adopting the principles of the Considerate Constructor's Scheme, sustainable waste management and sustainable supply chain management.

2.4 Project Aspirations

The project team's vision for the Proposed Development is to transform the old collection of buildings, which are becoming unfit for purpose and have a very high estimated future maintenance costs, into a modern appropriate building with adequate facilities to continue current activities and charity work with the potential to expand the charitable work further in the future.

The existing Church is within the King's Cross Conservation Area. The design of the Proposed Development has been carefully progressed with this as a key consideration to ensure that the buildings contribute positively to the character and appearance of neighbouring properties.

In addition, the aspiration is to create a sustainable asset by adopting sustainable design principles. These principles include ensuring efficient resource use (i.e. energy, water and materials), reduce overall greenhouse gas emissions, and improve wellbeing of future and existing (neighbouring) occupants. These aspirations have been defined by the key drivers for sustainability relating to legislation and policy; industry best practice; corporate commitments; and finance (see section 2.2 of this report).

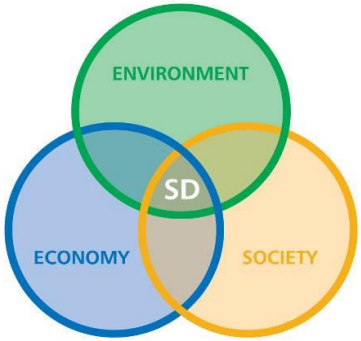
The design has also been informed by the credit requirements of the BREEAM assessment tool, and are committed to achieving BREEAM rating of 'Very Good'. In line with the Council's expectations, as indicated in Development Policies 2010 DP22 'Promoting Sustainable Design and Construction' and the Camden Planning Guidance 2015 CPG 3: Sustainability, the team are committed to achieving a BREEAM New Construction 2014 'Very Good' rating for the subsidised accommodation. Further information on the BREEAM score can be found in the BREEAM Pre-assessment report.

This Sustainability Statement should be read in conjunction with a number of additional supporting reports that have been prepared as part of this Planning Application by the team, including:

- Revised Design Addendum. November 2018;
- Design and Access Statement. submitted December 2015;
- Energy Statement. Updated November 2018;
- BREEAM Pre-assessment Report. Updated November 2018;
- Transport Assessment;
- Basement Impact Assessment;
- Archaeology;
- Heritage Significance Assessment. Updated November 2018;
- Planning Statement. Updated November 2018;
- Daylight, Sunlight and Shadowing Assessment. Updated November 2018;
- Planning statement; and
- Noise Assessment
- Viability Assessment. Updated November 2018

3. SUSTAINABILITY AGENDA

3.1 What is Sustainable Development?



At the core of the concept of sustainability is an approach to development that looks to balance different and sometimes competing needs with an understanding of the environmental, social and economic limitations we face.

All too often, development is driven by one particular need which can lead to a failure to fully consider the wider or future impacts of the development. The goal of sustainable development is to seek to simultaneously progress the three 'pillars' of sustainability – the economic, social and environmental goals - in ways that develop and maintain a good quality of life for us all and enable future generations to do the same.

3.2 Drivers for Sustainability

The design of the Proposed Development has been informed by a number of key drivers; namely, policy and legislation, sector and industry guidance and corporate and financial factors. The key drivers are considered in turn below, with reference to key policy, legislation and guidance documents that have helped to shape the sustainability strategy for the Proposed Development. It is against these drivers for sustainability, particularly local planning policy, that the scheme has been assessed.

Policy and Legislation

A review of current and emerging planning policies with regard to sustainable development has been undertaken and the key policy at national and regional levels is highlighted below:

- National Planning Policy Framework, 2012[1];
- London Plan, 2015[2]; and
- The Mayor's Sustainable Design and Construction Supplementary Planning Guidance (SPG), 2014[3], particularly the Mayor's Priorities and Best Practices where applicable;

In addition there is a series of local planning considerations incorporated the Camden Local Development Framework (LDF), which consists of a number of planning documents and development policies.

Policies within the Core Strategy (2010[4]) and the Development Policies (2010)[5] include the sustainability requirements and expectations for planning applications submitted within the borough. Further guidance is provided within the Camden Planning Guidance (2013)[6].

Specifically the most applicable planning policies and guidance are:

- Camden's Core Strategy: Policy 'CS13 – Tackling Climate Change Through Promoting Higher Environmental Standards;
- Camden's Core Strategy: Policy 'CS6 Providing Quality homes';
- Camden's Core Strategy: Policy 'CS10 Supporting Community Facilities and Services';

[1] A number of National Planning Policy Guidance Notes support the NPPF. However because the appraisal focuses on local issues these have not been reviewed in this report.

[2] Greater London Authority, 2015. London Plan Spatial Development Strategy for London, Consolidated with Alterations since 2011.

[3] Greater London Authority, 2014. Sustainable Design and Construction Supplementary Planning Guidance.

[4] Camden Core Strategy, 2010. London Borough of Camden

[5] Camden Development Policies, 2010. London Borough of Camden

[6] Camden Planning Guidance, 2013. London Borough of Camden

- Camden's Development Policies: Policy 'DP2 – Making Full Use of Camden's Capacity for Housing' and 'DP22 - Promoting sustainable design and construction'; and
- Camden Planning Guidance: CPG 3: Sustainability 2013

The table presented in Annex A of this Statement provides a summary of the requirements of the Planning Guidance, references to the applicable Core Strategy and Development Policy policies and a signpost for where the requirements and expectations applicable to the Proposed Development have been addressed within this Sustainability Statement.

Because the appraisal focuses on local issues, the provisions of the NPPF have not been reviewed in detail in this report, but has been considered in Table 6.1 for completeness.

Sector and Industry Guidance

A number of industry-specific drivers that promote the delivery of a sustainable built environment have been considered in order to ensure that an holistic approach is taken towards design development, which considers all aspects of environmental and sustainability performance including:

- UK Construction Industry Key Performance Indicators;
- The Waste Resources Action Programme ('WRAP') Recycled Content Toolkit and good practice guidance;
- Environment Agency's Pollution Prevention Guidelines;
- Environmental Certification such as Forestry Stewardship Council, BES6001 and ISO14001;
- BSRIA and CIBSE Guidelines for building services commissioning;
- Building Regulations and British Standards; and
- Building Research Establishment's Green Guide to Specification.

Reputational Risk

As noted in section 2.3, WLM are committed to ensuring a high standard of environmental and sustainable performance within the Proposed Development and have actively engaged with their design team from the outset.

Financial

The sustainability strategy for the Proposed Development has been developed in conjunction with the commercial viability of the scheme. The financial aspect of the scheme would be influenced by the incorporation of sustainable design features to help minimise operational costs, as well as improving the marketability of the units to prospective occupiers who may have their own requirements.

4. SUSTAINABILITY APPRAISAL

4.1 Approach and Methodology

This section of the Sustainability Statement presents an appraisal of the Proposed Development's performance against objectives drawn from a review of the LB Camden Local Development Framework which includes Camden's Core Strategy and Development Policies; as well as relevant policies set out in the London Plan.

Camden Core Strategy CS13 states that all developments need to '*take measure to minimise the effects of, and adapt to, climate change and encourage all development to meet the highest feasible environmental standards that are financially viable…*'.

Furthermore Development Policy 22 states that it is a requirement for developments to incorporate sustainable design and construction measures; promoted and measured through an expectation that if greater than 500sqm non-residential floor space, a BREEAM rating of "Very Good" is expected, as well as climate change resilient measures.

This Sustainable Statement has been commissioned in order to describe the high level of sustainability which has been incorporated into the design and how the Proposed Development aims to meet the requirements set out in the relevant policies.

Details of the sustainable features that have been incorporated within the Proposed Development are discussed below. In addition, the proposal has been appraised against relevant local planning policies, as summarised within the reference table at Table 4.1.

In addition, reference to targeted credits and credit requirements for the BREEAM 'Very Good' as well as relevant industry guidance has been made throughout the appraisal to inform the design, construction and operation of the application.

The sustainability appraisal is structured around a set of bespoke sustainability objectives which have been defined, taking account of local and regional policy objectives, industry aims such as BREEAM and professional expertise. The objectives cover the areas listed in local policy requirements and the issues covered in BREEAM.

The objectives demonstrate the importance of each topic area in contributing to sustainable design, construction and operation of the development at King's Cross Methodist Church. Specific policy requirements are listed in Table 4.1 and annex A

4.2 Energy

Sustainability Objective
To address the causes of climate change and reduce the local and global impact on the environment by reducing emissions of greenhouse gases, in particular carbon dioxide. To promote the design, construction and operation of energy efficient buildings, whilst reducing reliance on non-renewable sources of energy.

The following key sustainability features and energy efficiency measures have been incorporated in the design of the buildings:

- Adoption of the GLA's Energy Hierarchy principles of 'Be Lean, Be Clean, Be Green' within the Energy Statement;
- Specification of energy efficient building fabric above current requirements stipulated by Building Regulations Part L 2013;
- Appraisal of low and zero carbon (LZC) technologies and specification of a Combined Heat and Power (CHP) plant, Photo Voltaic (PV) panels, Variable Refrigerant Flow (VRF) and exhaust air heat pumps;
- Provision of Energy Display Devices to monitor electricity and primary heating fuel consumption;
- Specification of appropriate lighting and thermal zones and controls, including energy efficient internal and external lighting;
- Commissioning of all building services in line with best practice CIRIA and BSRIA standards;
- Details of energy efficiency features and building services within a Building User Guide and Home User Guide; and
- Target of a site-wide 35% reduction in CO_2 emissions against 2013 Building Regulations baseline, in line with London Plan requirements.

During construction, the Main Contractor will be required to monitor, meter and report upon monthly energy use from site activities and from site transport against set targets. The Main Contractor will promote best site practices to minimise energy use as far as practicable.

As the future tenant, the WLM will be provided with a Building User Guide for the Church and Community areas and a Home User Guide will be produced for the residential tenants, to ensure that the space is occupied and run in an energy efficient manner, which will contribute to reductions in unregulated energy use.

As part of the energy assessment, consideration was taken into the feasibility of connecting the Proposed Development to the King's Cross district heating network, however the location and cost of doing so was deemed prohibitive. Combined Heat and Power (CHP) has a high potential to reduce carbon emissions, the use of CHP in this development has been deemed feasible for the church areas due to the high occupancy rate of the meeting rooms and church areas. However, due to the occupancy and management challenges it is not deemed appropriate for the residential units, which will incorporate individual VRF exhaust air heat pumps.

A stand-alone Energy Statement has been prepared, which contains further technical details of the approach and measures integrated into the design of the proposed development aimed at minimising regulated CO_2 emissions. The energy strategy seeks to demonstrate how the overall energy consumption has been reduced in accordance with the Energy Hierarchy.

In this way, the proposed development is considered to be in accordance with the CO_2 emissions reduction targets set out in Policies 5.2, 5.3, 5.6, 5.7 and 5.9 of the London Plan, the Mayor's Priorities and Best Practices, along with the requirements in Core Strategy Policy CS13 and CPG 3: Sustainability guidance 2, 3, 5 and 6.

4.3 Transport

Sustainability Objective
To reduce road congestion and transport related pollution levels by enabling walking, cycling and the use of good public transport networks.

The following key sustainability features relating to transport have been incorporated into the design:

- Safe and secure cycle storage spaces, with sufficient space to accommodate associated changing facilities and storage space, in line with BREEAM requirements;
- A car free development with an associated Travel Plan with key recommendations to minimise reliance upon private car use in line with BREEAM Requirements; and
- Details of nearest modes of public transport within the Building User Guide and Home User Guide.

Operationally, the Church tenants will be provided with a Building User Guide for commercial space and a Home User Guide for potential residents. A Travel Plan will be adopted in the commercial areas to encourage alternative modes of transport and minimise private car use.

Moreover, the Site benefits from its close proximity to public transport nodes, with Kings Cross and St. Pancras railway stations within 200 m of the Site and with Angel, Russell Square, King's Cross St Pancras and London Euston Underground Tube Stations all within 1.5 km of the Site; . Additionally, a series of bus stops along Gray's Inn Road to the east and Euston Road to the north of the Site provide public transport services. Therefore, the Site is in an 'excellent' area for public transport, with a Public Transport Accessibility Level of 6b.

Furthermore, the provision of safe and secure cycle spaces will also encourage alternative and sustainable transport to minimise private car use by all occupants and visitors.

A stand-alone Transport Assessment has been prepared, which assesses the impacts of the development upon the surrounding highways network. Recommendations to minimise reliance upon private car has also been made and integrated into the design of the building.

In this way, the proposal is considered to be in accordance with the transport requirements set out in Policies 6.3, 6.9 and 6.13 of the London Plan and Development Policies DP16-19.

4.4 Water Resources

Sustainability Objective
To minimise impacts upon water resources by conserving water resources through the use of water efficient components and water recycling systems, and to reduce flood risk through management of surface water run-off.

The Site is located in Flood Zone 1 which is defined by the Environment Agency (EA) as having little or no flood risk with a 1 in 1,000 year annual probability (0.1% or less) of flooding from rivers or the sea in any one year. The Site currently predominantly comprises a mid-terrace building with no vegetation. The Proposed Development would include an area of green roof a new open courtyard spaces; therefore, the Proposed Development would result in a decrease in the area of impermeable area on-site compared with the existing site.

The Site is within a hydrogeological constraint area with considerations regarding slope stability and ground water, these will be addressed within the basement impact assessment.

The following key sustainable features and water efficiency measures have been incorporated in the design of the buildings:

- Surface water will be attenuated by the installation of a green roof which will intercept a proportion of the runoff;
- Indoor water use and average water consumption for the residential units will be no greater than 105 litres per person per day (Table 1 predicts <103.92 l/person/day);
- The provision of water efficient sanitary fittings including dual flush WCs and low flow taps, meeting the requirements for BREEAM of a 12.5 % improvement against the notional building;
- For the Church and community areas, flow control devices to WC areas to minimise water leaks and wastage from sanitary fittings;
- Water meter with a pulsed output on the incoming water supply; and,
- Drought-resistant and/or precipitation reliant species as part of the soft landscaping strategy.

Calculations showing estimated water consumption for the dwellings are as shown in Table 1. This is based on information and communications to date. The calculation is based on Approved Document G, Appendix A – Water Efficiency Calculator for New Dwellings. The aim is to reduce water consumption by implementing and specifying efficient water fixtures, which in addition to meeting this planning requirement, adhere to BREEAM requirements.

During construction, the Main Contractor will be required to monitor, meter and report upon monthly water use from site activities and from site transport against set targets. The Main Contractor will promote best site practices to minimise water use as far as practicable, details of which would be included within the CEMP.

A stand-alone Flood Risk Assessment has been prepared for the Planning Application, which contains details of surface water management on-site.

Table 1 Approved Document G, Appendix A: Water efficiency calculation for new dwellings

		(1)	(2)	(3)	(4)
Installation Type	**Unit of Measure**	**Capacity / flow rate**	**Use Factor**	**Fixed use l/p/day**	**L/p/day**
WC (dual flush)	Full flush vol (l)	4	1.46	0.00	5.84
	Part flush vol (l)	2.6	2.96	0.00	7.70
Taps (excl kitchen / utility room)	Flow rate (l/min)	4	1.58	1.58	7.90
Bath (where shower also present)	Capacity to overflow (l)	130	0.11	0.00	14.30
Shower (where bath also present)	Flow rate (l/min)	8	4.37	0.00	34.96
Kitchen/utilty rm taps	Flow rate (l/min)	10	0.44	10.36	14.76
Washing machine	l/kg dry load	8.5	2.10	0.00	17.85
Dishwasher	l/place setting	15	3.60	0.00	5.40
(5)		Total calculated use = (Sum column 4)			108.71
(6)		Contribution from greywater (litres/person/day) from Table 4.6			0.00
(7)		Contribution from rainwater (litres/person/day) from Table 5.5			0.00
(8)		Normalisation factor			0.91
(9)		Total water consumption = [(5) - (6) - (7)] x (8)			98.92
(10)		External water use			5.00
(11)		Total water consumption = (9) + (10) (litres/person/day)			103.92

Note no grey water recycling is included in the design. The area of planting is very small with anticipated little or no additional watering, while the size of the development and water saving measures in place through the BREEAM assessment and building services specification, aim to reduce the water demand, which means the cost to benefit of installing a grey water recycling scheme is not deemed to be of significant advantage.

In this way, the proposal is considered to accord with the water use reduction targets and responsible sourcing of materials as set out in Policies 5.3, 5.12 and 5.13 of the London Plan, the Mayor's Priorities and Best Practices and Core Strategy CS13. Along with the requirements in Development Policies DP23 and CPG 3: Sustainability guidance 7, 11 and 12.

4.5 Materials and Supply Chain

Sustainability Objective
To reduce social and environmental impacts from consumption of resources by using sustainably produced and local products.

The following key sustainable materials & supply chain measures have been incorporated in the design of the buildings:

- At least three of the five key building elements will achieve a Green Guide 2008 Rating of A+ to D;
- All timber will be sourced in accordance with UK Government's Timber Procurement Policy;
- Aiming to achieve at least 10% of total value of materials from recycled and reused sources, including reusing demolition materials on site where possible; and
- In line with BREEAM requirements, materials for building fabric and services insulation, and major building elements will be responsibly sourced where possible.

The design team will seek to specify materials with a low environmental impact and consideration will be given to the major building elements, which will be informed by the BRE's Green Guide to Specification.

Where possible, the materials specification and products used will be informed by whether materials:

- achieve the highest Green Guide to Specification rating;
- have low embodied energy that require little processing during manufacturing;
- are locally sourced or on-site to minimise transport impacts (e.g. crushed aggregates);
- comprise high recycled content particularly for steel, glass, cladding and flooring products;
- include reclaimed materials;
- are durable and resistant to climate change impacts and pedestrian/vehicular/trolley movements;
- are re-used, recycled, refilled, recharged or reconditioned; and
- are accredited to environmental standard such as Forestry Stewardship Council, Environmental Management System Certification including ISO14001 or BES6001, and the EU Energy rating for goods.

In addition, consideration has been given to the selection of materials that respond and adapt to climate change. The purpose of this has been to recognise and encourage measures taken to mitigate the impact of varying weather conditions arising from climate change over the lifespan of the buildings. Materials that offer structural and fabric resilience from solar radiation, moisture, wind and temperature variation has been prioritised.

In this way, the proposal is considered to be in accordance with the CO2 emissions reduction targets and responsible sourcing of materials as set out in Policies 5.3, 5.20 and 7.6 of the London Plan, the Mayor's Priorities and Best

Practices, Core Strategy Policy CS13 and CPG 3: Sustainability guidance 8, 9 and 12. As well as the requirements set out in Development Policies DP22.

4.6 Waste

Sustainability Objective
To minimise waste generation during the construction and operation of a development and to divert waste from landfill by adopting the Waste Hierarchy approach and promoting waste reduction and recycling.

The following key sustainable waste measures have been incorporated in the design of the buildings:

- Design of the Proposed Development to 'design-out' waste, such as consideration of pre-fabrication off-site as far as practicable;
- Allocation of storage space for residential and Church activity recyclable waste;
- Separate storage areas for commercial and residential recycling and non-recycling waste; and,
- Details of sustainable waste management for future tenants are contained within the Building User guide for commercial uses and the Home User Guide for residential units.

A Construction Management Plan (CMP) will be prepared by the Main Contractor to indicate the general management arrangements that should be adopted to control potentially significant impacts during construction, including those relating to waste management. A Site Waste Management Plan (SWMP) will also be prepared by the Main Contractor to minimise construction waste with procedures to divert 85% of waste from landfill.

Specific requirements for waste minimisation will be set out in the SWMP, which will apply to the preferred Waste Hierarchy as shown in Figure 1.3.

The SWMP would as a minimum, cover:

- Identification of key demolition materials and application of the Waste Hierarchy with respect to reuse and recycling on or off-site;
- Identification of all key waste groups for diversion from landfill;
- Commitments to; design out waste, reduce waste generation on site and develop and implement procedures to sort out and reuse/recycle construction waste on and off-site; and
- Scope of monitoring covering the transport of construction waste from the construction site to waste disposal processing/recovery centre gate.

In this way, the proposal is considered to be in accordance with the objectives and guidance for sustainable waste management as set out in Policies 5.3, 5.18, 5.20 and 7.6 of the London Plan, the Mayor's Priorities and Best Practices, Core Strategy Policies CS13 and CS18 and CPG 3 Sustainability guidance 8. Along with the requirements in Development Policy DP22.

Figure 4.3: The Waste Hierarchy

4.7 Biodiversity

Sustainability Objective
To conserve and enhance the biodiversity of the region by conserving and enhancing areas valued for their diversity of wildlife, habitats, and landscape value.

The Site currently has no green spaces, thus the ecological value and its potential to support notable and/or legally protected species is negligible. In preparation for planning application an ecological survey will be undertaken, any recommendations will be included in the final designs where feasible.

The Site is located in an urban area, within central London. The Site comprises a building flanked by commercial, hotels and residential buildings. There is no vegetation present on-site. There is an area of garden within the residential development immediately to the south of the Site, and street trees, small parks and green squares in the wider area.

Although in an urban setting, there are opportunities for increasing the value of the Site for nature conservation.

The following measures are being considered for incorporation where possible:

- Provision of green roofs within the development, with features suitable for use by invertebrates;
- Construction of new courtyard areas with associated planting;
- Specification of biodiversity enhancement measures such as bat, bird and invertebrate boxes ; and
- Inclusion of native and fruiting plant species including trees and climbers within soft landscaped areas.

As the site currently has no green space there will be no negative change in the ecological value of the site, while the creation of courtyards and a green roof offers potential for an increase in the site's ecological value. Planting and landscaping will be completed in line with BREEAM requirements to support the achievement of the BREEAM Land Use and Ecology credits.

In this way, the proposal is considered to be in accordance with the ecology and biodiversity objectives set out in Policies 5.3 and 7.19 of the London Plan, the Mayor's Priorities and Best Practices, Core Strategy Policies CS 13 and CS15. Along with the requirements in Camden Development Polices DP22 and DP25 and CPG 3: Sustainability guidance 10 and 13.

4.8 Pollution

Sustainability Objective
To reduce inequalities in the health of the population by improving air quality, and preventing noise, light and ground water pollution.

The following key sustainable pollution measures have been incorporated in the design of the buildings/external areas:

- All insulating materials will use substances that have a GWP of less than 5;
- The inclusion of green roofs across the Site to manage surface water run-off;
- Decrease in impermeable surfaces at the Site;
- The potential for water and ground pollution is low as there is limited plant at roof levels and parking on site,
- Specification of external lighting compliant with BREEAM 'Ene 3 External Lighting', providing space lighting with dedicated energy efficient fittings

and security fittings with the appropriate control gear to minimise light pollution; and

- Adoption of the Energy Hierarchy principles as outlined in the Energy section above, including: CHP, VRF exhaust air source heat pumps and PV panels to contribute to the reduction of CO_2 and NOx emissions associated with on-site energy use.

Sustainability Objective

To recognise and encourage measures taken to mitigate the impact of climate change over the lifespan of the built environment.

As part of construction activities, the Main Contractor will be required to sign up to the Considerate Constructors Scheme and achieve a score of 'Very Good' or above. Additionally, the Main Contractor will be required to adopt best construction practices and methods in executing the construction works so as to avoid or reduce impacts associated with air quality, ground and surface water, as well as noise and vibration, as far as possible. Where appropriate, the Main Contractor will adopt and refer to key documents such as the EA Pollution Prevention Guidelines. Any noise and air quality emissions would be effectively controlled by employing best practice measures to be implemented through a CMS/CEMP as agreed with the Council.

Although the Site is located within an Air Quality Management Area, the proposal will replace an existing Church and associated facilities with a similar development, with the addition of residential apartments, and will not introduce any additional significant point source emissions (i.e. from large boilers or industrial processes). Furthermore it is not expected that the Proposed Development will result in a significant increase in traffic, the site has excellent public transport access and no additional facilities for private car use.

In addition, where any operational plant is specified, these would be agreed in advance with the Council with agreed parameters (including operational hours and plant specification) to ensure that minimum background noise levels to the nearest receptors are achieved.

In this way, the proposal is considered to be in accordance with the prevention of pollution to air quality, noise and surface/ground water as set out in Policies 5.3, 5.13, 7.14 and 7.15 of the London Plan, the Mayor's Priorities and Best Practices, Core Strategy Policies CS13 and CS16. Along with the requirements set out in Development Policies DP22-23, DP26, DP28 and DP32 and CPG 3 Sustainability guidance 2, 3, 7 and 10.

4.9 Climate Change Adaptation

The following key sustainable measures have been incorporated in the design of the buildings and external areas, enhancing their ability to adapt to climate change:

- Specifying building fabric with high thermal mass and achieving the Fabric Energy Efficiency targets contained within Part L1A and Part L2A of the Building Regulations, where appropriate;
- Providing passive solar shading and minimising excessive solar gain;
- Minimising dependence upon non-renewable energy sources by considering Low and Zero Carbon (LZC) technologies as part of the building services strategy;
- Redevelopment of an existing site within an area of low flood risk;
- Selection of materials that are durable and respond to extreme weather events associated with climate change;
- No increase in impermeable surfaces at the site;
- The conservation of water through the use of water efficient components; and

- An appropriate thermal zoning and control strategy to maintain an optimum level of thermal comfort for building occupants.

The Proposed Development has been designed to adapt to, and be flexible to not only a wide range of uses, but to adapt to climate change and extreme weather events.

In this way, it is considered that the proposal accords with climate change adaption and mitigation objectives as set out in Policies 5.2, 5.3, 5.9 and 5.12 of the London Plan, the Mayor's Priorities and Best Practices, Core Strategy Policies CS13 and CS16. Along with the requirements set out in Development Policies DP22-24 and DP32 and CPG 3: Sustainability guidance 12.

4.10 Wellbeing

Sustainability Objective
To consider the wellbeing of building occupants and neighbouring site users within and around the built environment.

The following key sustainable health and wellbeing measures have been incorporated in the design of the buildings and external areas:

- The design of residential units ensuring that key rooms have high daylight factors and a view of the sky including the living rooms and dining rooms;
- Specification of sound insulation to ensure that the buildings achieve an appropriate standard of acoustic performance in line with British Standard 8233 and that separating walls and floors exist between habitable spaces;
- All residential units will be designed to Lifetime Homes specifications and all criteria will be met;
- The design of the central courtyard space will allow natural light into the middle of the building and offer views out;
- Appropriate thermal zoning and control strategy to improve the thermal performance of the buildings to allow control of internal thermal comfort by occupants;
- Specification of materials that protect the building from internal and external pedestrian and vehicular movement, and are highly durable, especially in public areas; and
- The provision of new and improved facilities will allow the continuation of the work the WLM and other users of the building undertake which provide added benefit for the wider community.

During construction, the Main Contractor would be required to adhere to all relevant legislation (i.e. Health and Safety), as well as signing up to the Considerate Constructors Scheme. Site staff will be required to undergo a site induction which would include details of health and safety, safe working practices and other best practices.

In this way, the Proposed Development is considered to be in accordance with creating safe and healthy working environments as set out in Policies 5.9 and 7.3 of the London Plan, the Mayor's Priorities and Best Practices, Core Strategy Policies CS16, CS16 and CS17. Along with requirements set out in Development Policies DP6, DP15, DP17 and DP26-29.

4.11 Socio Economic

Sustainability Objective

To create and sustain vibrant communities, addressing a deficiency in the provision of services to the local community and recognising the needs of everyone.

The Proposed Development has been carefully considered against the alternative options of doing nothing and an extensive refurbishment. The proposed solution offers an economically feasible option to allow the continuation of a part of the community which has roots back nearly 200 years. As well as the ability for the Church and WLM to remain in its current location, while continuing to offer its current charitable work for the community and expand into further areas and services.

The new and improved facilities will allow the continuation of current work the Church does in the community, while providing the opportunity to expand this work into new areas. Often the services provided by the WLM and other users of its facilities are for vulnerable or marginalised members of the community which struggle to find the same service elsewhere. This development is a unique proposal to support and improve a series of community services which would be difficult to replace if lost.

In addition to the societal good the church does, the development will provide new residential accommodation in a sought after area, helping the borough to meet its housing targets: 'DP2 Making Full Use of Camden's Capacity for Housing' and 'DP5 Homes of Different Sizes'; all of which aim to maximise the supply of homes within LB Camden.

The design of the new Church has been considered to match the local character while also offering a new and interesting facade to the street which it is hoped will enhance the visual landscape and fit with the regeneration occurring in the surrounding area.

The Proposed Development will generate employment opportunities during the construction phase, which would benefit construction in the local area. In addition, the Proposed Development would provide valuable space for other community groups not directly affiliated with the Church to use, providing another service for the wider community.

Accordingly, the development is considered to be in accordance with the provision of employment objectives as set out in Policy 4.4 of the London Plan, the Mayor's Priorities and Best Practices, Core Strategy Policies CS8 and CS10. Along with the requirements set out in Development Policies DM10, DM13 and DM15.

4.12 Land Use

Sustainability Objective

To develop more sustainable forms of development strategic thought needs to be given to how the development fits within the larger scale and can work with and enhance existing services and facilities.

The Site is currently occupied by the Church. However, the current building is no longer fit for purpose and the projected future maintenance costs are expected to exceed the Church's income. The design offers the opportunity to create more modern facilities, as well as a greater amount and variation in space and uses, which are fit for current and future needs. In addition the creation of apartments offers new housing in a desirable area with good transport links. All of which will be within the same footprint of the original Church building.

The proposal will provide optimum use of a previously developed site with a development density that has been fully maximised based on local context and design principles.

Overall, the development is considered to be in accordance with the reuse of land as set out in the Mayor's Priorities and Best Practices, Core Strategy Policies CS6 and CS14. Along with the requirements set out in Development Policies DP1-2 and DP25.

Table 4.1: Project Performance against Key Planning Policies		
Planning Policy	**Consideration**	**Reference**
London Plan 2015, NPPF March 2012		
Policy 5.2: Minimising Carbon Dioxide Emissions	✓	Energy (Section 4.2) Climate Change Adaption (Section 4.9) Stand-alone Energy Strategy
Policy 5.3: Sustainable Design and Construction	✓	Energy (Section 4.2) Materials and Supply Chain (Section 4.5) Waste (Section 4.6 Water Resources (Section 4.4) Biodiversity (Section 3.6) Pollution (Section 4.8) Climate Change Adaption (Section 4.9)
Policy 5.6: Decentralised Energy in Development Proposals	✓	Energy (Section 4.2)
Policy 5.7: Renewable Energy	✓	Energy (Section 4.2)
Policy 5.9: Overheating and Cooling	✓	Energy (Section 4.2) Climate Change Adaption (Section 4.9) Wellbeing (Section 4.10)
Policy 5.12: Flood Risk Management	✓	Water Resources (Section 4.4) Climate Change Adaption (Section 4.9) Stand-alone Flood Risk Assessment
Policy 5.13: Sustainable Drainage	✓	Water Resources (Section 4.4) Pollution (Section 4.8) Stand-alone Flood Risk Assessment

Table 4.1: Project Performance against Key Planning Policies		
Planning Policy	**Consideration**	**Reference**
London Plan July 2015, NPPF March 2012		
Policy 5.18: Construction, Excavation and Demolition Waste	✓	Materials and Supply Chain (Section 4.5) Waste (Section 4.6)
Policy 5.20: Aggregates	✓	Materials and Supply Chain (Section 4.5) Waste (Section 4.6)
Policy 6.3 Assessing Effects of Development on Transport Capacity	✓	Transport (Section 4.3) Stand-alone Transport Statement
Policy 6.9 Cycling	✓	Transport (Section 4.3) Stand-alone Transport Statement Stand-alone Design and Access Statement
Policy 6.13 Parking	✓	Transport (Section 4.3) Stand-alone Transport Statement
Policy 7.3 Designing out Crime	✓	Wellbeing (Section 4.10) Stand-alone Design and Access Statement
Policy 7.6 Architecture	✓	Materials and Supply Chain (Section 4.5) Stand-alone Design and Access Statement
Policy 7.14 Reducing Air Quality	✓	Pollution (Section 4.8) Climate Change Adaption (Section 4.9)
Policy 7.15 Reducing Noise and Enhancing Soundscapes	✓	Pollution (Section 4.8) Stand-alone Noise Report
Policy 7.19 Biodiversity and Access to Nature	✓	Biodiversity (Section 3.6) Stand-alone Ecology Report

Table 4.1: Project Performance against Key Planning Policies		
Planning Policy	**Consideration**	**Reference**
GLA's Sustainable Design & Construction SPG 2014 – Mayor's Priorities and Best Practice		
1) Resource Management		
Land: Optimising the reuse of land (Mayor's Priority)	✓	Land Use (Section 4.12) Stand-alone Design and Access Statement
Site layout and building design (Mayor's Priority and Best Practice)	✓	Pollution (Section 4.8) Stand-alone Design and Access Statement
Energy and carbon dioxide emissions (Mayor's Priority)	✓	Energy (Section 4.2) Stand-alone Energy Strategy
Energy demand assessment (Mayor's Priority)	✓	Energy (Section 4.2) Stand-alone Energy Strategy
Use less energy (Mayor's Priority and Best Practice)	✓	Energy (Section 4.2) Stand-alone Energy Strategy
Efficient energy supply (Mayor's Priority)	✓	Energy (Section 4.2) Stand-alone Energy Strategy
Renewable energy (Mayor's Priority)	✓	Energy (Section 4.2) Stand-alone Energy Strategy
Carbon dioxide off-setting (Mayor's Priority)	✓	Energy (Section 4.2) Stand-alone Energy Strategy
Monitoring energy use (Mayor's Priority)	✓	Energy (Section 4.2) Stand-alone Energy Strategy Stand-alone BREEAM Pre-assessment Report
Water efficiency (Mayor's Priority and Best Practice)	✓	Water Resources (Section 4.4)

Table 4.1: Project Performance against Key Planning Policies		
Planning Policy	**Consideration**	**Reference**
Materials and waste: Design, Construction and Operational Phase (Mayor's Priority and Best Practice)	✓	Materials and Supply Chain (Section 4.5) Waste (Section 4.6)
Nature conservation and biodiversity (Mayor's Priority)	✓	Biodiversity (Section 3.6) Stand-alone Ecology Report
2) Climate Change Adaptation		
Tacking increased temperature and drought: Overheating, Heat and drought resistant planting, resilient foundations, urban greening and trees (Mayor's Priority and Best Practice)	✓	Energy (Section 4.2) Water Resources (Section 4.4) Biodiversity (Section 3.6) Pollution (Section 4.8) Climate Change Adaption (Section 4.9) Wellbeing (Section 4.10)
Flooding: Surface water flooding and sustainable drainage, flood resilience and resistance of buildings in flood risk areas, flood risk management, other sources of flooding (Mayor's Priority)	✓	Water Resources (Section 4.4) Climate Change Adaption (Section 4.9) Stand-alone Flood Risk Assessment
3) Pollution Management		
Land contamination (Mayor's Priority)	✓	Water Resources (Section 4.4) Pollution (Section 4.8)
Air quality (Mayor's Priority)	✓	Pollution (Section 4.8)
Noise (Mayor's Priority)	✓	Pollution (Section 4.8) Stand-alone Noise Report
Light pollution (Mayor's Priority)	✓	Pollution (Section 4.8)
Water pollution: Surface water run-off (Mayor's Priority)	✓	Water Resources (Section 4.4)

Table 4.1: Project Performance against Key Planning Policies		
Planning Policy	**Consideration**	**Reference**
		Pollution (Section 4.8)
Local Policy		
Local Development Framework, Core Strategy 2010		
CS6 Providing quality homes	✓	Wellbeing (Section 4.10) Materials and Supply Chain (Section 4.5) Land use (Section 4.12)
CS8 Promoting a successful and inclusive Camden economy	✓	Socio-economic (Section 4.11)
CS10 Supporting Community facilities and services	✓	Wellbeing (Section 4.10) Socio-economic (Section 4.11)
CS11 Promoting sustainable and efficient travel	✓	Transport (Section 4.3) Wellbeing (Section 4.10) Stand-alone Transport Statement
CS13 Tackling climate change through promoting higher environmental standards	✓	Energy (Section 4.2) Stand-alone Energy Strategy Water Resources (Section 4.4) Climate Change Adaption (Section 4.9)
CS14 Promoting high quality places and conserving on heritage	✓	Wellbeing (Section 4.10) Stand-alone Design and Access Statement Land Use (Section 4.12)
CS15 Protecting and improving our parks and open spaces and encouraging biodiversity	✓	Land Use (Section 4.12) Biodiversity (Section 4.7) Stand-alone Ecology Report

Table 4.1: Project Performance against Key Planning Policies		
Planning Policy	**Consideration**	**Reference**
CS16 Improving Camden's Health and Wellbeing	✓	Wellbeing (Section 4.10) Pollution (Section 4.8)
CS17 Making Camden a safer place	✓	Wellbeing (Section 4.10) Land Use (Section 4.12) Stand-alone Design and Access Statement
CS18 Dealing with our waste and encouraging recycling	✓	Waste (Section 4.6)
Camden Development Policies 2010-2025		
DP1 Mixed use development	✓	Land Use (Section 4.12)
DP2 Making full use of Camden's capacity for housing	✓	Land Use (Section 4.12) Socio-economic (Section 4.11)
DP3 Contributions to the supply of affordable housing	✓	Land Use (Section 4.12) Socio-economic (Section 4.11) Wellbeing (Section 4.10)
DP5 Homes of different sizes	✓	Land Use (Section 4.12) Socio-economic (Section 4.11)
DP6 Lifetime homes and wheelchair housing	✓	Wellbeing (Section 4.10)
DP13 Employment premises and sites	✓	Land Use (Section 4.12) Socio-economic (Section 4.11)
DP15 Community and leisure uses	✓	Land Use (Section 4.12) Socio-economic (Section 3.10)
DP16 The transport implications of development	✓	Transport (Section 4.3)

Table 4.1: Project Performance against Key Planning Policies		
Planning Policy	**Consideration**	**Reference**
		Land Use (Section 4.12) Stand-alone Transport Statement
DP17 Walking, cycling and public transport	✓	Transport (Section 4.3) Land Use (Section 4.12) Wellbeing (Section 4.10) Stand-alone Transport Statement
DP18 Parking standards and limiting the availability of car parking	✓	Transport (Section 4.3) Pollution (Section 4.8) Stand-alone Transport Statement
DP19 Managing the impact of parking	✓	Transport (Section 4.3) Pollution (Section 4.8) Stand-alone Transport Statement
DP20 Movement of goods and materials	✓	Transport (Section 4.3) Materials and Supply Chain (Section 3.3) Stand-alone Transport Statement
DP22 Promoting sustainable design and construction	✓	Materials and Supply Chain (Section 3.3) Climate Change Adaption (Section 3.8) Pollution (Section 4.8) Biodiversity (Section 3.6) Stand-alone BREEAM Pre-assessment Report Stand-alone Daylight, Sunlight and Overshadowing Report

Table 4.1: Project Performance against Key Planning Policies		
Planning Policy	**Consideration**	**Reference**
DP23 Water	✓	Water Resources (Section 4.4)
DP24 Securing high quality design	✓	Materials and Supply Chain (Section 3.3) Land Use (Section 4.12) Stand-alone Design and Access Statement
DP25 Conserving Camden's heritage	✓	Biodiversity (Section 3.6) Land Use (Section 4.12) Stand-alone Design and Access Statement
DP26 Managing the impact of development on occupiers and neighbours	✓	Pollution (Section 4.8) Wellbeing (Section 4.10) Land Use (Section 4.12)
DP27 Basements and light wells	✓	Water Resources (Section 4.4) Materials and Supply Chain (Section 3.3) Stand-alone Flood Risk Assessment Stand-alone Daylight, Sunlight and Overshadowing Report
DP28 Noise and vibration	✓	Pollution (Section 4.8) Wellbeing (Section 4.10) Land Use (Section 4.12) Stand-alone Noise Report
DP29 Improving access	✓	Wellbeing (Section 4.10) Land Use (Section 4.12) Stand-alone Design and Access Statement
DP32 Air quality and Camden's Clear Zone	✓	Pollution (Section 4.8)

Table 4.1: Project Performance against Key Planning Policies		
Planning Policy	**Consideration**	**Reference**
		Climate Change Adaption (Section 3.8)
Camden Planning Guidance 3: Sustainability	✓	
2. The energy hierarchy	✓	Energy (Section 4.2) Stand-alone Energy Strategy Stand-alone BREEAM Pre-assessment Report
3. Energy efficiency: new buildings	✓	Energy (Section 4.2) Stand-alone Energy Strategy Stand-alone BREEAM Pre-assessment Report
5. Decentralised energy networks and combined heat power	✓	Energy (Section 4.2) Stand-alone Energy Strategy
6. Renewable energy	✓	Energy (Section 4.2) Stand-alone Energy Strategy
7. Water efficiency	✓	Water Resources (Section 4.4)
8. Sustainable use of materials	✓	Materials and Supply Chain (Section 3.3)
9. Sustainability assessment tools	✓	Stand-alone BREEAM Pre-assessment Report
10. Brown roof, green roofs and green walls	✓	Biodiversity (Section 4.7) Climate Change Adaptation (Section 4.9)
11. Flooding	✓	Water Resources (Section 4.4) Stand-alone Flood Risk Assessment
12. Adapting to Climate Change	✓	Climate Change Adaptation (Section 4.9)
13. Biodiversity	✓	Biodiversity (Section 4.7)

5. CONCLUSIONS

This Sustainability Statement has been directed by a range of 'drivers' including planning and legislation, industry best practice, corporate commitments made by the applicant, as well as financial drivers.

Both the Mayor of London and the LB Camden are committed to sustainable development whilst having regard to the future of London as a whole. As a result, the planning policies and development standards set for this area emphasise the importance of sustainable development, focusing on economic, social and environmental goals - in ways that develop and maintain a good quality of life for both present and future generations.

It is important that the Proposed Development contributes to local sustainability aims as well as meeting national and regional objectives for sustainable development.

The Proposed Development has been progressed in line with sustainable design and construction principles, informed by relevant planning policy, BREEAM and industry guidance. Table 4.1 is a summary of the relevant planning policies at regional and local levels, with reference to the relevant sections of this Sustainability Statement. Appendix A offers a greater breakdown of the requirements of Camden's Development Policies and Planning Guidance CPG3 Sustainability and how they are addressed by the Proposed Development.

In addition to its long history of being a place of worship the Church runs multiple projects aimed at helping the wider community, especially vulnerable groups such as: the homeless, gambling addicts, illegal immigrants, sex workers and alcoholics. Along with providing facilities for a variety of community groups. It is hoped these will continue and expand into new areas with the provision of new and improved facilities. Many of these actions are not represented in the sustainable assessments and policy but are a vital service which can only continue with the support of the WLM and their Church facilities.

As part of the Sustainability Strategy, the applicant and design team are committed to targeting BREEAM 2014 'Very Good' rating, for the required areas. Although the Church element is not being formally assessed, the design has been progressed with the same sustainable design principles in mind and due to the combined nature of the development, has incorporated many of the same requirements. The bespoke nature of the project and the wider community benefits it will provide are a huge benefit for the community and wider borough, many of which are outside the usual scope of assessments.

In summary, the sustainability assessment has informed the design process by identifying opportunities and constraints for sustainable development, and is considered to respond to both local and regional planning policy requirements.

Camden

GREATER LONDON AUTHORITY

Annex A: Summary of Camden Development Policies and CPG 3 Sustainability Requirements

Table A. Summary of Camden Development Policies Requirements			
Development Type	**Relevant Local Development Framework Policy**	**Requirements developers must address in the Sustainable Design and Construction Statement**	**Is the requirement applicable and is it meeting the requirements?**
A) Camden Development Policies			
1. Location and management of Camden's growth			
All development	• DP1	• Mix of uses in developments where appropriate, including contribution to housing supply.	• Yes, creation of new housing
2. Meeting Camden's needs – Providing homes, jobs and facilities			
All development	• DP2	• Protecting and enhancing the supply of housing in the borough	• Yes, no loss of housing
3. Contributions to the supply of affordable housing			
All development	• DP3	• All residential developments with 10 or more additional dwellings to contribute to supply of affordable homes.	• No, 11 dwellings
4. Minimising the loss of affordable homes			
All development	• DP4	• Council would resist net loss of affordable housing.	• No, no loss of housing
5. Homes of different sizes			
All development	• DP5	• Seek to create communities with a mix of home sizes in developments	• Yes, range of 1 and 2 bed apartments
6. Lifetime homes and wheelchair housing			
Housing developments	• DP6	• Housing developments should meet lifetime homes standards and 10% homes meet wheelchair standards, or easily adaptable to	• Yes, meet lifetime homes standards and over 10% easily convertible for wheelchairs
7. Sheltered housing and care homes for older people			

Table A. Summary of Camden Development Policies Requirements			
Development Type	**Relevant Local Development Framework Policy**	**Requirements developers must address in the Sustainable Design and Construction Statement**	**Is the requirement applicable and is it meeting the requirements?**
A) Camden Development Policies			
Sheltered home developments	• DP7	• Council will support new sheltered housing and care homes for older people.	• No, however development does support homeless
8. Accommodation for homeless people and vulnerable people			
All development	• DP8	• Accommodation for homeless people and vulnerable people will be supported by the council, while loss will be resisted	• Yes, the Church's work involving supporting homeless and vulnerable people will be improved
9. Student housing, bedsits and other housing with shared facilities			
All development	• DP9	• Council will support housing with shared facilities, and will resist its loss	• Yes, subsidised ancillary accommodation will be improved
10. Helping and promoting small and independent shops			
All development	• DP10	• Council will encourage small shop premises for independent business, and will seek to protect its loss	• No, no shops currently present or proposed
11. Markets			
Markets	• DP11	• Council will protect and promotes markets	• No, not applicable
12. Supporting strong centres and managing the impacts of food, drink, entertainment and other town centre uses			
Town centre developments	• DP12	• Council will ensure that development of shopping, services, food, drink, entertainment and other town centre uses does not harm the town centre	• No, not applicable
13. Employment premises and sites			
Current businesses	• DP13	• Council will retain land and buildings which are suitable for business.	• No, no business use

Table A. Summary of Camden Development Policies Requirements			
Development Type	**Relevant Local Development Framework Policy**	**Requirements developers must address in the Sustainable Design and Construction Statement**	**Is the requirement applicable and is it meeting the requirements?**
A) Camden Development Policies			
14. Tourism development and visitor accommodation			
Tourism developments	• DP14	• Council support for new tourism developments and visitor accommodation	• No, not applicable
15. Community and leisure uses			
Community/leisure developments	• DP15	• Council will support increased leisure facilities and protect current community facilities	• Yes, loss of out dated community facilities to be replaced with more modern facilities
16. The transport implications of developments			
All development	• DP16	• Ensure that the development is integrated into transport network and supported by adequate transport links	• Yes, no change to access and improved facilities for walking and cycling
17. Walking, cycling and public transport			
All development	• DP17	• Developments should promote walking, cycling and sustainable transport through appropriate facilities	• Yes, improved provision of facilities for walking and cycling
18. Parking standards and limiting the availability of car parking			
All development	• DP18	• Central London Area developments should be car free	• Yes, car free development
19. Managing the impact of parking			
All development	• DP19	• Creation of additional car parking will not have negative effects on parking, highways or environment	• No, no additional parking
20. Movement of goods and materials			

Table A. Summary of Camden Development Policies Requirements			
Development Type	**Relevant Local Development Framework Policy**	**Requirements developers must address in the Sustainable Design and Construction Statement**	**Is the requirement applicable and is it meeting the requirements?**
A) Camden Development Policies			
All development	• DP20	• Minimising the movement, and impact of, of goods and materials by roads is encouraged	• Yes, movements will be optimised to create as little impact as reasonably expected
21. Development connecting to the highway network			
Developments connecting to the highway	• DP21	• Developments connecting to the highway must do so in a responsible way avoiding impacting on the highway.	• No, not connecting to the highway
22. Promoting sustainable design and construction			
All development	• DP22	• Requirements for incorporation of sustainable design and construction measures.	• Yes, BREEAM Very Good targeted
23. Water			
All development	• DP23	• Developments should reduce their water consumption, pressure on sewers and risk of flooding.	• Yes, water consumption is reduced and rainfall attenuation.
24. Securing high quality design			
All development	• DP24	• All developments should be of high standard of design, especially regarding character and context	• Yes, design has carefully considered the character of the area
25. Conserving Camden's heritage			
All development	• DP25	• Heritage of Camden should be conserved, especially conservation areas, listed buildings and archaeology	• Yes, conservation area considerations have influenced the design
26. Managing the impact of development on occupiers and neighbours			

Table A. Summary of Camden Development Policies Requirements			
Development Type	**Relevant Local Development Framework Policy**	**Requirements developers must address in the Sustainable Design and Construction Statement**	**Is the requirement applicable and is it meeting the requirements?**
A) Camden Development Policies			
All development	• DP26	• Occupiers and neighbours'' quality of life is protected	• Yes, the design has been considered in terms of its location and impact on neighbours
27. Basements and lightwells			
All developments with basements and lightwells	• DP27	• Impact on drainage, flooding, ground water and structure stability	• Yes, flooding and ground conditions considered during design
28. Noise and vibration			
All development	• DP28	• Noise and vibration are controlled and managed appropriately	• Yes, contractor will follow guidance and achieve CCS very good score
29. Improving access			
All development	• DP29	• Barriers preventing people from accessing buildings will be removed	• Yes, development is designed to be accessible to all
30. Shopfronts			
Shops	• DP30	• Shopfronts should be of a high standard and be fitting with the local character	• No, no shopfronts
31. Provision of and improvements to open space and outdoor sport and recreation facilities			
All development	• DP31	• Provision of outdoor space and sports facilities is improved	• No, no loss of open space
32. Air quality and Camden's clear zone			

Table A. Summary of Camden Development Policies Requirements			
Development Type	**Relevant Local Development Framework Policy**	**Requirements developers must address in the Sustainable Design and Construction Statement**	**Is the requirement applicable and is it meeting the requirements?**
A) Camden Development Policies			
All development	• DP32	• Developments could potentially cause significant harm to air quality, air quality assessments are needed and mitigation measures are expected in low air quality zones.	• No, no significant impact on air quality, improved efficiency of heating will reduce air pollution
B) Camden Planning Guidance: 3 Sustainability			
2. Energy Hierarchy			
All development	• CPG2	• Developments designed to reduce carbon dioxide by following the energy hierarchy	• Yes, using the energy hierarchy and building guidance at least 33% reduction in carbon expected
3. Energy efficiency: new buildings			
All new development	• CPG 3	• Developments designed to minimise carbon dioxide, most effective way is through reducing energy demand via good design, insulation and air tightness.	• Yes, energy efficiency has been considered throughout the design, following principles of BREEAM
4. Energy efficiency: existing buildings			
All refurbished development	• CPG4	• At least 10% of project cost for updating and refurbishing buildings should be spent on environmental improvements.	• No, not applicable
5. Decentralised energy networks and combined heat and power			
All development	• CPG5	• Where feasible development should connect to decentralised energy network or use CHP	• Yes, CHP specified.
6. Renewable energy			

Table A. Summary of Camden Development Policies Requirements			
Development Type	**Relevant Local Development Framework Policy**	**Requirements developers must address in the Sustainable Design and Construction Statement**	**Is the requirement applicable and is it meeting the requirements?**
A) Camden Development Policies			
All development	• CPG6	• Developments are to target 20% reduction in carbon dioxide through use of on-site renewable energy	• Yes, VRF exhaust air source heat pumps along with PV panels, achieving a reduction of 33%
7. Water efficiency			
All developments of 10+ units or 1000+sqm	• CPG7	• Developments over 10 units or 1000sqm should include grey water recycling	• Yes, water use has been reduced by following BREEAM guidance although no grey water recycling
8. Sustainable use of materials			
All development	• CPG8	• Ideally reuse buildings, if not possible the waste hierarchy should be followed. Materials should be responsibly sourced and safe	• Yes, current reuse is not financially sustainable, materials are being sourced responsibly as BREEAM requirements
9. Sustainability assessment tools			
All development with 500+sqm	• CPG9	• 500sqm or more non-residential need to be designed to BREEAM	• Yes, BREEAM Very Good for subsidised ancillary accommodation.
10. Brown roofs, green roofs and green walls			
All development	• CPG10	• All development should include green or brown roof or wall	• Yes, green roof specified
11. Flooding			
All development	• CPG11	• All development required to prevent or mitigate flooding, manage drainage and surface water	• Yes, green roof attenuates water and there is no change to impermeable surface

Table A. Summary of Camden Development Policies Requirements			
Development Type	**Relevant Local Development Framework Policy**	**Requirements developers must address in the Sustainable Design and Construction Statement**	**Is the requirement applicable and is it meeting the requirements?**
A) Camden Development Policies			
12. Adapting to climate change			
All development	• CPG12	• Design consideration into how will be occupied in the future	• Yes, Church has been occupied for nearly 200 years, expect to continue
13. Biodiversity			
All development	• CPG13	• Demonstrate how biodiversity considerations have been incorporated, mitigation measures and positive biodiversity measures	• Yes, currently no green space, proposed design includes courtyards and green roof, creation of habitats.