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Planning Report Sustainability Statement 34A-36 Kilburn High Road

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Executive Summary Sustainability Statement

34A-36 Kilburn High Road

Executive summary

The development proposals comprise of the construction of a new 5th floor level extension on top of the existing 34A-36 Kilburn High Road building, to create 5 new residential units. The development is located in in the London Borough of Camden.

This Sustainability Statement will be provided as evidence to the London Borough of Camden to demonstrate the development's holistic approach to sustainable design and construction. It summarises the contribution that the design will make to creating a more sustainable development, drawing on information provided by specialist consultants and design reports, and identifying key features intrinsic to achieving low carbon developments.

In summary the proposed development will achieve the following sustainable design and construction criteria:

- Reduce total carbon dioxide (CO₂) emissions by 37.1% over Building Regulations Part
- Energy consumption will be reduced by targeting high insulation and thermal bridging standards, air permeability and highly efficient lighting.
- Energy demand will be met by an air source heat pump (ASHP) and solar photovoltaic (PV) panel system.
- Natural ventilation through opening windows will be used as a passive cooling

 measure.
- Minimise embodied carbon through efficient design, procurement of materials from a local source, or with a high-recycled content.
- Ensure that materials are responsibly sourced and of low environmental impact.
- A water consumption target of 110 litres/person/day, by the specification of efficient water-consuming appliances and sanitaryware.
- Sustainable transport will be promoted by the use of public transport and provision of safe cycle storage.
- Incorporate health and wellbeing measures through design and operational procedures, including daylight, optimum indoor air quality and thermal comfort.
- Protect the ecological value of the site.
- Follow best practice policies in terms of air, water and ground pollution during construction, manage and minimise construction waste and follow the principles of the Considerate Constructors Scheme.

Key sustainability measures

In summary, the key measures incorporated to meet planning requirements and to achieve a low carbon development address the following key areas of sustainable design and construction:

- Energy and CO₂
- Adaptation to climate change
- Waste
- Water Efficiency
- Transport and connectivity
- Materials
- · Health and wellbeing

Introduction Sustainability Statement 34A-36 Kilburn High Road

Sustainability introduction

The design team has significant experience in delivering schemes that are considered highly sustainable, either through application of formal green building rating systems, such as the Building Research Establishment Environmental Assessment Method (BREEAM) and Home Quality Mark (HQM) as well as applying benchmarks from standards such as Passivhaus Design, and adopting precedents from industry exemplar sustainable developments.

The scheme will reflect the holistic nature of sustainable development to the London Borough of Camden. The development will provide high quality housing in an area of need, and will use local labour to boost employment. Health and wellbeing will be incorporated in the design by maximising daylighting, utilising healthy materials and contributing to the alleviation of fuel poverty in the region. The ecological value of the site will be maintained and protected. The development will enhance the ecological value of the site through measures such as native planting where feasible.

Description of development

The development proposals comprise of the construction of a new 5th floor level extension on top of the existing 34A-36 Kilburn High Road building, to create 5 new residential units. The development has a total net internal area of 470 m².

The aspiration for the scheme is to significantly improve the existing site and its immediate environment by providing an efficient and inclusive development, which meets the policy recommendations of the London Borough of Camden.

Policy Context

Sustainability Statement 34A-36 Kilburn High Road

National context: The 2008 Climate Change Act

The UK Government is committed to reducing the UK's carbon emissions by 80% over 1990 levels through the Climate Change Act 2008. Achieving truly sustainable design and construction and forwarding the green agenda within the construction industry across the UK is inherent to meeting these emission targets. This development aims to do both of these.

To help monitor carbon reductions and to plot progress being made for future plans and investments in the UK's low-carbon economy, intermediary targets have been established to ensure that the UK remains on course for meeting the 80% reduction by 2050.

Concurrent with reducing CO_2 emissions by 80% by 2050 is the European Climate Change Policy targets. It sets the objective of ensuring 20% of energy consumption is generated from renewable sources by 2020 whilst also reducing Europe's carbon footprint by 20%. Ensuring a fabric first approach with consideration to renewable energy production fits both the climate change act and the European Commission's 2020 targets for reducing greenhouse gas (GHG) emissions.

The London Plan

The London Plan 2016

The London Plan is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20–25 years. It provides the high-level framework for the development and use of land in London, linking in improvements to infrastructure (especially transport); setting out proposals for implementation, coordination and resourcing; and helping to ensure joined-up policy delivery.

One of the issues the London Plan attempts to address is the response to climate change. The Government's latest UK Climate Change Projections suggest that by the 2050s, London could see an increase in mean summer temperature of 2.7 degrees, an increase in mean winter rainfall of 15 per cent and a decrease in mean summer rainfall of 18 per cent over a 1961–1990 baseline. As a result, the London Plan seeks to achieve an overall reduction in London's carbon dioxide emissions of 60 per cent (below 1990 levels) by 2025. This means implementing the Be Lean, Be Clean, Be Green energy hierarchy and a requirement for a Zero Carbon improvement on 2010 Building Regulations for residential buildings.

The New Draft London Plan 2019

The new draft London Plan provides updated policies relating to sustainability within Chapter 9 'Sustainable Infrastructure'. A number of these draft policies are relevant to development proposals:

- Policy SI1 Improving air quality
- Policy SI2 Minimising greenhouse gas emissions
- Policy SI3 Energy infrastructure
- Policy SI4 Managing heat risk
- Policy SI5 Water infrastructure
- Policy SI6 Digital connectivity infrastructure
- Policy SI7 Reducing waste and supporting the circular economy
- Policy SI8 Waste capacity and net waste self-sufficiency
- Policy SI12 Flood risk management
- Policy SI13 Sustainable drainage

Policy Context

Sustainability Statement 34A-36 Kilburn High Road

Local context: Camden Local Plan 2017

The Camden Local Plan, published in July 2017, sets out the Council's planning policies. It responds to the Borough's unique characteristics and provides a comprehensive local policy framework to deliver Camden's future sustainable development. The Plan is supported by the supplementary planning document 'Camden Planning Guidance 3: Sustainability'.

The Camden Local Plan states a key strategic objective as 'investing in our communities to ensure sustainable neighbourhoods'. This is complimented by further objectives embedded in the Local Plan that define the sustainability vision of the council.

Chapter 8 'Sustainability and climate change' within the Camden Local Plan lists key sustainability objectives for the Borough. The following strategic objectives are relevant to this sustainability statement:

- 8.3 Developments should reduce carbon dioxide emissions in line with the steps in the energy hierarchy. Developments should support this by ensuring the availability of sustainable transport options, optimising resource efficiency and encouraging sensitive energy use.
- 8.18 All developments should optimise resource efficiency through waste and energy reduction, minimising materials required, opting for materials with low embodied carbon content and enabling low energy and water demands.
- 8.33 All developments should adopt appropriate climate change adaptation measures such as green infrastructure and SuDS where feasible.
- 8.53 Developments should incorporate water efficiency measures, consider the impact of development in areas prone to flooding and avoid harm to the water environment. Residential developments will be expected to meet the requirement of 110 litres per person per day including 5 litres for external water use. Refurbishments will be expected to meet BREEAM water efficiency credits.
- 8.84 Construction should adopt sustainable design and construction methods including measures that minimise negative impacts on air quality.
- 8.90 Developments should include facilities for the storage and collection of waste and recycling.

Further relevant sustainability objectives stated in the Camden Local Plan include the following:

4.84 - Developments should incorporate design principles that contribute to community safety and security.

Policy Context Sustainability Statement 34A-36 Kilburn High Road

Camden Planning Guidance 3 Sustainability

The Camden Planning Guidance (CPG) 3 Sustainability issued in March 2018 supports the policies in the Camden Local Plan and forms a supplementary planning document (SPD) for planning decisions. The CPG and additional guidance it provides on interpretation of the Local Plan sustainability policies is considered in this sustainability statement.

- 4.3 All buildings are expected to reduce their carbon emissions by making improvements to the existing building. As a guide, at least 10% of the project cost should be spent on the improvements.
- 8.0 Waste reduction measures should be incorporated. Primarily, this should involve the re-use of buildings where feasible. All developments should aim for at least 10% of the total value of materials to be derived from recycled and reused sources. Materials used in construction should be sourced responsibly and ensure they are safe to health.
- 10.0 All developments should incorporate green and brown roofs where feasible.
- 11.0 All developments are required to prevent or mitigate against flooding and manage drainage and surface water, Developments should not increase the risk of flooding.

Energy and CO₂

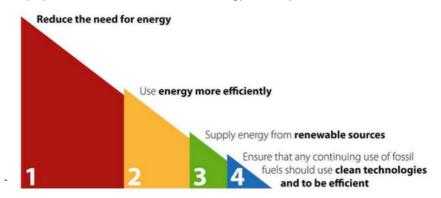
Sustainability Statement 34A-36 Kilburn High Road

Energy strategy

The Energy Statement report, issued in May 2019 by Eight Associates, summarises the energy strategy for 34A-36 Kilburn High Road. The development will reduce carbon emissions by 7.0% from the fabric energy efficiency measures described in the 'Be Lean' section, and will reduce total carbon emissions by 37.1% over Building Regulations with the further inclusion of low and zero carbon technologies (air source heat pumps (ASHP) and solar photovoltaic (PV) panels). The following section is a summary of the findings in accordance with the energy hierarchy and policy requirements.

The energy hierarchy

The proposed scheme has followed the energy hierarchy that is illustrated below:



This methodology, widely used in accordance with meeting the Sustainable Design and Construction Supplementary Planning Guidance (SPG), has been adopted for the scheme using a 'Lean', 'Clean', and Green' approach in addressing the London Borough of Camden's policy. A summary of the savings in carbon emissions are shown below:

GLA's Energy Hierarchy – Regulated Carbon Emissions						
	Baseline:	Be Lean:	Be Clean:	Be Green:		
CO ₂ emissions (Tonnes CO ₂ /yr)	6.78	6.31	-	4.26		
CO ₂ emissions saving (Tonnes CO ₂ /yr)	-	0.47	-	2.05		
Saving from each stage (%)	-	7.0	-	37.1		

Total CO₂ emissions saving (Tonnes CO₂/yr)

2.52

37.1% of total carbon emissions savings over Part L 1A of the Building Regulations 2013 achieved.

Energy and CO₂

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Energy efficiency strategies

Energy efficiency measures that will be applied to 34A-36 Kilburn High Road include:

- High insulation and thermal bridging standards to reduce transfer of heat through the building fabric.
- Space heating will be provided by a communal air source heat pump (ASHP) system, with a COP of more than 3.0. Heat will be distributed via underfloor heating and all pipework will be fully insulated to minimise heat loss.
- 70% of water heating will be provided by the communal ASHP and 30% by a supplementary immersion heater.
- The building envelope will target a reduced air permeability of 3 m³/(hr.m²) @ 50 pa, improving on Building Regulations requirements, to reduce unnecessary air infiltration.
- Daylighting and well-planned floor layouts to reduce the need for artificial lighting.
- High efficacy lighting greater than 70lm/W.
- A photovoltaic (PV) panel system of 4.5 kWp has been specified.

Thermal comfort and overheating

To minimise energy loss, the building fabric performance will be designed to achieve a balance between retaining heat during winter and allowing the building to dissipate heat during the summer months. Further measures to reduce overheating and the need for cooling include:

- Energy efficient design to minimise internal heat generation. Energy efficient appliances and lighting will be specified.
- Direct solar gains will be controlled through specifying appropriate location, size and type of windows. A g-value of 0.55 is specified.
- Reduced air permeability rate and maximised insulation levels.
- Natural ventilation through opening windows will be used as a passive cooling measure.

Adaptation to Climate Change

Sustainability Statement 34A-36 Kilburn High Road

Climate-resilient design

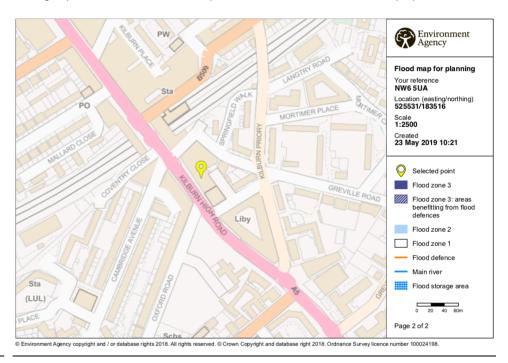
The proposed development will mitigate its climate change impact by reducing CO₂ emissions (through energy efficiency strategies, air source heat pump and solar PV panel system). Passive design measures, including openable windows for natural ventilation, are integrated into the design of the development and will ensure that the risks of overheating for building occupants are minimised.

The design and construction of the building will include the provision of suitable durability and protection measures for vulnerable parts of the building. All key exposed building elements will be designed and specified to limit long and short term degradation from environmental factors, including those expected to be exacerbated by climate change.

Flood risk and sustainable drainage

The 34A-36 Kilburn High Road site is located within Flood Zone 1 of the Environment Agency's Flood Map for Planning (map shown below). This is defined as an area with little or no risk to flooding where the annual probability of river, tidal and coastal flooding (with defences where they exist) is <0.1% i.e. less than 1 in 1,000 years. Furthermore, the proposed development is rooftop extension at 5th storey level, above any worst-case design flood levels.

Due to the scope of the development comprising a rooftop extension, with no associated landscaping works at ground level, there are limited opportunities to incorporate sustainable drainage systems (SuDS) in the development, therefore there are no SuDS proposed.



Waste

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Construction waste management

Resource efficiency will be promoted through effective and appropriate management of demolition and construction site waste.

In line with the waste hierarchy, during the construction phase, the approach will be the following:

- Use reclaimed materials;
- Use materials with higher levels of recycled content; and
- Use new materials.

For any demolition, the following approach will be adopted:

- Prioritise the on site reuse of demolition materials;
- Adopt on site recycling and, where required, use off site recycling; and
- The least preferred option disposal to landfill.

A site waste management plan will be developed which adopts best practice benchmarks for resource efficiency, details procedures and commitments to minimise non-hazardous and hazardous waste at the design stage and monitors/measures waste production on site. The plan will apply to the location of the building.

The site waste management plan will also include procedures and commitments to sort and divert waste from landfill through the following:

- Re-use on site;
- Salvage/reclaim for re-use off-site;
- Return to supplier via a 'take-back' scheme;
- Recovery and recycling using an approved waste management contractor; and
- Compost.

The project has committed to diverting at least 85% by volume (90% by weight) of non-hazardous non-demolition waste generated by the project to be diverted from landfill.

Operational waste

Dedicated internal and external waste storage and recycling facilities are proposed to encourage recycling. The storage space will provide inclusive access and usability. Camden Borough Council offers a mixed recycling and food waste collection service, so separate mixed recycling and food waste bins will be provided within the units.

Construction Management

Sustainability Statement 34A-36 Kilburn High Road

Construction environmental management

Environmental impacts of the construction works will be mitigated as far as possible. This will include the incorporation of the following:

- Contractor will develop and implement a construction environmental management plan (CEMP), specific to the site.
- Training and site induction of all site operatives.
- Monitoring of energy, water and transport to and from site during construction.
- Management of waste on site.
- Following best practice pollution guidance from the Environment Agency.
- Ensuring all site timber is responsibly sourced in line with the UK Government's Timber Procurement Policy.
- Vehicle emissions would be minimised through the use of catalytic converters and the regular maintenance of vehicle engines.
- Damping down of brick walls etc. during any building demolition.
- Regularly inspecting and wet suppressing materials / soil stockpiles where necessary (including wind shielding or completely enclosing, storing away from site boundaries, and restricted height of stockpiles).
- Appropriate orientating of material stockpiles.
- Providing wheel washing and wet suppressing during the loading of wagons vehicles.
- Covering vehicles carrying dry soil and other wastes.
- Shielding of dust-generating construction activities.
- Providing suitable site hoarding.
- Restricting vehicle speeds on haul roads and other unsurfaced areas of the site.
- Inspecting unsurfaced haulage routes, and wet suppressing should this be necessary (in times of prolonged dry periods).

The Air Quality Assessment (AQA) report, issued in May 2019 by Eight Associates, assesses the dust and pollution risk from construction activities. The unmitigated risk to local sensitive receptors from emissions of dust and pollution from construction activities is deemed to be *low and negligible* risk, aside from the risk of dust soiling from demolition, which is *medium*. The risk form all construction activities can and should be mitigated further to *negligible* through the measures set out in the Air Quality & Dust Management Plan (AQDMP), which should be implemented through the principal contractor's Construction Environmental Management Plan.

Considerate constructors

The scheme will adopt the principles of the Considerate Constructors Scheme (CCS). The CCS scheme aims to recognise and encourage construction sites that are managed in an environmentally and socially considerate, responsible and accountable manner.

Water Efficiency Sustainability Statement 34A-36 Kilburn High Road

Water management introduction

The development proposals recognise the need to create a scheme that uses water efficiently and is adaptable to potential heightened water scarcity in a future climate scenario.

Water conservation

The design team is committed to achieve a significant reduction in water use for the development over typical performance, equating to a water consumption target of 110 litres per person per day, as per Section 8.53 in the Camden Local Plan.

Water consumption will be reduced through the use of water efficient components for all specified domestic water-consuming components (including low-flow showerheads and taps, dual flush toilets and low water consuming washing machines and dishwashers), water meters for each dwelling, water recycling systems where appropriate and flow control devices that regulate the supply of water to each facility according to demand.

Transport and Connectivity

Sustainability Statement 34A-36 Kilburn High Road

Public transport

The 34A-36 Kilburn High Road development has a public transport accessibility level (PTAL) rating of 6a, meaning it has a high level of accessibility (see map below). It is located approximately 50m from Kilburn High Road railway station. There are four bus stops within an approximate 50m radius of the site, serving a number of local bus routes, providing a frequent service in both peak and off-peak hours.





You can click anywhere on the map to change the selected location.

PTAL output for Base Year 6a

Cycling provision

The proposed development is currently targeting the provision of 11 secure, integrated and accessible spaces for cycle storage, to serve the five new residential units. The proposed cycle storage spaces are in accordance with the London Plan and Camden requirements.

Travel strategy

The development is car free, in a highly accessibly location for public transport and providing cycle storage to promote cycling. As such, sustainable modes of transport (public transport, cycling and walking) are expected to comprise all journeys for the development.

Accessibility and security

Creating a secure but fully accessible development is a key part of the proposed development. To ensure this is achieved, the design team will look to adopt where feasible, the key principles of "Secured by Design" within all elements of the scheme.

Materials

Sustainability Statement 34A-36 Kilburn High Road

Materials and waste introduction

Sustainable material sourcing and waste management will be considered throughout the life of the building to ensure the scheme's environmental footprint is minimised as far as possible. The scheme will also ensure low embodied carbon throughout the procurement, transport and construction of building materials, together with end of life emissions.

Materials selection and sourcing

The design team has confirmed that efforts will be made to reuse materials where feasible, and that where required, new materials will be responsibly sourced. New construction materials will be selected, where feasible, with a low environmental impact. In addition, the project will aim for new materials to come from a recycled or reused source, including a high-recycled content in steel. Minimum standards apply to new timber, which must be sourced in accordance with the UK Government's Timber Procurement Policy.

In addition, all timber will be FSC / PEFC certified, all concrete will be BES 6001 certified and any other material will be ISO 14001 certified for both key processes and supply chain / extraction processes where feasible to do so.

The Green Guide for Specification is a reference tool, providing guidance on the relative environmental impacts for a range of different building elemental specifications, based on Life Cycle Assessment and the Environmental Profile Methodology. The design team will reference the Green Guide to Specification to help specify materials with a low environmental impact, where feasible. The design will incorporate at least 5 build-up elements will be A-C rated on the Green Guide.

Insulation specifications will eliminate hydrochlorofluorocarbons (HCFCs) and ozone depleting materials, wherever possible. All insulation specified will have a Global Warming Potential (GWP) of less than 5, and be responsibly sourced to have a low embodied impact.

Embodied carbon analysis

The development will utilise a number of opportunities to reduce embodied carbon, as follows:

- The development will retain the historic facades of the building where feasible.
- A materials efficiency strategy will be followed throughout the design, procurement
 and construction stages of the development, to ensure the scheme produces less
 waste on site. For example, adjustment of some sizes will be made to minimise
 offcuts of materials, and some bespoke materials will be developed off-site.
- Materials will be procured from the local area where possible, to reduce carbon through transportation.
- Materials and products with a higher recycled content will preferentially be procured where feasible, as these have a low embodied carbon.
- Consideration has been made to use timber as a low embodied carbon alternative to steel and concrete where possible.
- The design team has confirmed the Waste and Resources Action Programme (WRAP) guidance 'cutting embodied carbon in construction projects' will be followed.

Health and Wellbeing Sustainability Statement 34A-36 Kilburn High Road

Occupant wellbeing

The development has been designed to ensure the wellbeing of occupants in terms of levels of fresh air, thermal comfort and reduction of overheating, access to natural light, good lighting levels internally and externally, acoustic performance and access to safe drinking water.

The building services strategy has been carefully considered in order to balance the need for energy-smart, low carbon technologies with the need for adequate and controllable ventilation, heating and cooling.

Air quality

The Air Quality Assessment report, issued in May 2019 by Eight Associates, assesses the existing air quality and potential impact of the development on air quality.

The entire borough of Camden has been declared an Air Quality Management Area (AQMA). Recent data (2014 to 2017) from monitoring sites for NO₂, PM₁₀ and PM₂₅ concludes:

- NO₂ mean annual concentration exceeds 40 µg/m³ at all sites.
- NO₂ hourly mean of 200 µg/m³ is not exceeded more than 18 times per year, aside from at one site in 2016.
- PM₁₀ mean annual concentration is less than 40 μg/m³ at all sites.
- PM₁₀ daily mean of 50 µg/m³ is not exceeded more than 35 times per year at any site.
- PM_{2.5} mean annual concentration is less than 25 μg/m³ at all sites.

For developments within London, the AQA methodology incudes the requirement to undertake an assessment against the Air Quality Neutral (AQN) guidance. There are predicted to be no private car journeys directly associated with the development and as a result, no localised transport emissions. There will be no combustion of biomass or fossil fuels on site, therefore no localised building emissions. The development passes the AQN test for transport and building emissions.

Dispersion modelling has been undertaken to assess the concentrations of NO_2 and PM_{10} at the site and the impact of the proposed development on local NO_2 and PM_{10} concentrations. The development's contribution to NO_2 and PM_{10} concentrations is zero, as there are no new localised emissions sources proposed.

In addition, the design team will take measures to ensure that internal air quality is optimised by reducing internal sources of pollution. The team will specify only low volatile organic compounds (VOC) finishing products, including sealants and paints. All composite wood products will contain no added urea formaldehyde.

Daylight

The design has been developed to allow the use of daylight within the residential units to be maximised as far as practical. The lighting strategy will include daylight sensors to optimise the use of natural sunlight.

Inclusive design

The principles of Lifetime Homes will be incorporated to achieve an inclusive built environment that enables users to maximise their individual abilities and enjoy safe and independent participation.

Light pollution

To minimise light pollution to the neighbours and wildlife the building's external lighting will be designed in compliance with Table 2 (and its accompanying notes) of the Institution of Lighting Professionals (ILP) Guidance notes for the reduction of obtrusive light, 2011.

Land Use and Ecology Sustainability Statement 34A-36 Kilburn High

Road

Protection of biodiversity

The proposed development will promote the protection of any existing ecological features from damage during site demolition and the completion of the construction works.

The design team is committed to protecting biodiversity on site and will implement the following measures:

- Confirm that all relevant UK and EU legislation relating to protection and enhancement of ecology has been complied with during the design and construction process.
- Ensure that any affected trees and shrubs are cleared out of bird breeding season (March-August). Alternatively, a SQE should check for the presence of active nests prior to the commencement of works.
- Implement bat and bird protection in line with best practice.
- Implement working methods in line with best practice to manage dust and water run-off.
- During the construction phase a Biodiversity Champion will be appointed to monitor and limit environmentally detrimental activities. They will also train the workforce on the project to raise their awareness of environmental impacts during construction.

Conclusion

Sustainability Statement 34A-36 Kilburn High Road

Conclusion

This Sustainability Statement has responded to the London Borough of Camden's local planning policy requirements.

In summary the proposed development will achieve the following sustainable design and construction criteria:

- Reduce total carbon dioxide (CO₂) emissions by 37.1% over Building Regulations Part I
- Energy consumption will be reduced by targeting high insulation and thermal bridging standards, air permeability and highly efficient lighting.
- Energy demand will be met by an air source heat pump (ASHP) and solar photovoltaic (PV) panel system.
- Natural ventilation through opening windows will be used as a passive cooling measure.
- Minimise embodied carbon through efficient design, procurement of materials from a local source, or with a high-recycled content.
- Ensure that materials are responsibly sourced and of low environmental impact.
- A water consumption target of 110 litres/person/day, by the specification of efficient water-consuming appliances and sanitaryware.
- Sustainable transport will be promoted by the use of public transport and provision of safe cycle storage.
- Incorporate health and wellbeing measures through design and operational procedures, including daylight, optimum indoor air quality and thermal comfort.
- Protect the ecological value of the site.
- Follow best practice policies in terms of air, water and ground pollution during construction, manage and minimise construction waste and follow the principles of the Considerate Constructors Scheme.