



# **The Atrium Basement**

**Camden Market Estate Holdings Limited**

## **Sustainability Statement**

**Revision 02**  
**21/05/2021**

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## Project Particulars

Client Name: Camden Market Estate Holdings Limited

Project Name: The Atrium Basement

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## Executive Summary

This Sustainability Statement has been prepared by Scotch Partners LLP on behalf Camden Market Estate Holdings Limited ('the Applicant') to support the Change of Use Planning Application for the lower ground floors and part ground floor of The Atrium, North Yard, Camden Market, London, NW1.

The proposals seek permission to use the lower ground floor and basement area of Camden Market for leisure/entertainment (sui generis) use.

The facility is to be operated by Little Lion Entertainment, an established company in the entertainment industry, who are to occupy the site as a tenant. The company has operated sites in Angel, Islington, Shaftesbury Avenue, Westminster and at the old Granada Studios, Manchester. Its particular specialism is to provide themed experiences for customers, and this is epitomised in the Crystal Maze Live Experience in Westminster and Manchester, which emulates the television show "The Crystal Maze".

This application is made by the landlord of the site in consultation with the tenant. The tenant will be required to adhere to the principles set out in this document by virtue of a lease agreement.

This report sets out the strategy that has informed the design proposals in order to deliver a high level of sustainability performance and demonstrate compliance with both the planning policy requirements and the applicant's sustainability aspirations. In particular, the strategy has been designed to align with the Camden Local Plan (2017) and the Intend to Publish London Plan.

The sustainability statement has been developed in line with the policy guidance and targets summarised in the table below:

No.	Standard/Target	Proposed Measures
1	Camden Local Plan Policy CC2 All development will be required to achieve BREEAM 'Excellent' for major non-residential floorspace.	Following submission of the application, the tenant has confirmed that the space will not be heated or cooled. Given the very limited works being undertaken by the Applicant for the change of use, Parts 1, 2 and 3 of the BREEAM Refurbishment & Fit out Assessment would no longer be applicable. Only Part 4 would apply which relates to interior design, which is the

		responsibility of the tenant and not the Applicant. It is also worth noting that the change of use will not result in additional floor area. Subsequently, it is considered that the policy requirement for BREEAM is not applicable to this application.
2	Camden Local Plan Policy CC3 Developments to ensure there is no net increase in surface water runoff.	There is no increase in surface area and therefore no impact on the net surface water runoff of the development.
3	Camden Local Plan Policy CC4 and Policy A4 Development should not result in pollution or hazards which prejudice the health and safety of the local community and the environment.	Minimise as far as practicable the impact of the Development on the local environment. Air, light and noise pollution considered.
4	Camden Local Plan Policy CC5 Demonstrate how the development addresses waste minimisation	Designed using principles of the Circular Economy. The Site waste management strategy aligns with the waste hierarchy.
5	Camden Local Plan Policy CC1 Minimum overall CO <sub>2</sub> reduction of 35% to be achieved; Target is net zero carbon in operation.	As the space will not be heated or cooled by the tenant, and the change of use is exempt from Building Regulations Part L, this policy is considered not to be applicable to the application.

# 1 Introduction

## 1.1 Development Overview

Operationally, the proposals for Camden Market are similar to those already operated at other sites by the prospective tenant. The model is in some respects similar to an 'escape room' style of operation, where participants are guided through a set and complete a variety of activities.

The theme proposed is that of 'Judge Dredd', a long-running comic book series and comic strip that was published in the Daily Star and Metro, as well as being portrayed in two films and a number of computer/video games. The character was featured as one of a series of comic characters that was issued by the Royal Mail in 2012. In providing this theme, Little Lion Entertainment has partnered with Rebellion Studios, a major film and software company who market the Judge Dredd brand.

The existing layout of the building would be utilised to provide an ancillary, themed retail area and admissions office at the entrance via upper basement level, with the remainder set out to the entertainment experience and a refreshment area. The retail area would provide souvenirs associated with the experience and the brand.

There are no proposed changes to the supporting structure of the building and all of the sets within it are capable of being removed. Should any external alterations be required in the future then these would be the subject of a separate application, as required.

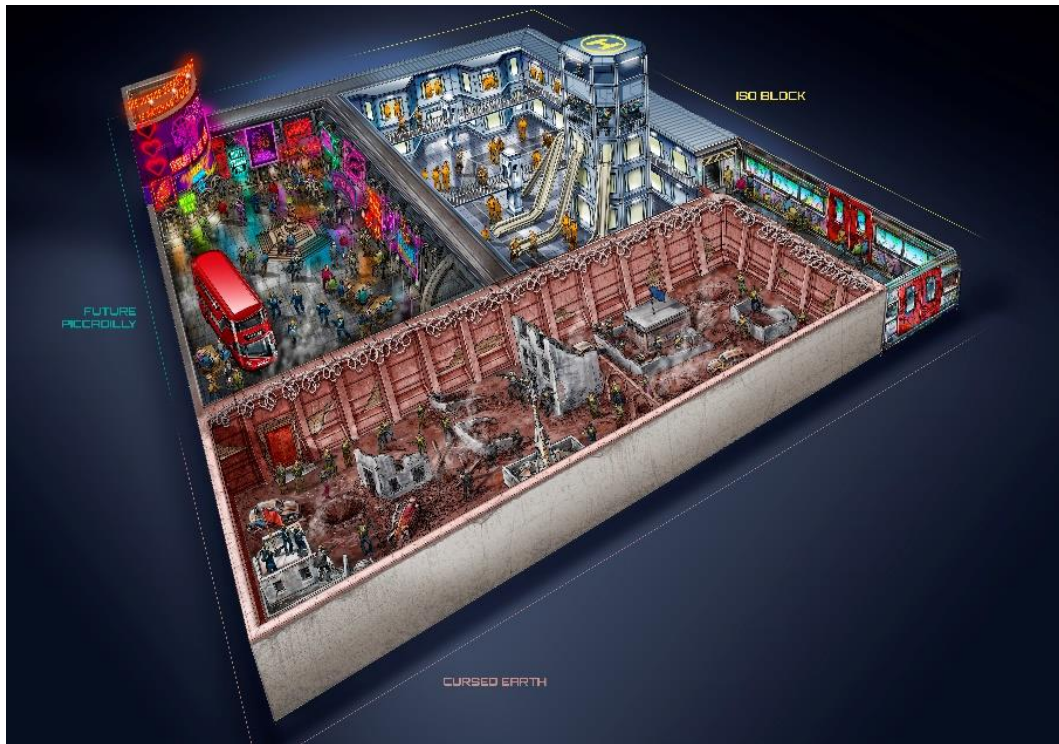


Figure 1-1 Notional Layout Artwork

## 1.2 Developing the Energy & Sustainability Strategy

The Applicant and the project team are keen to demonstrate environmental and social responsibility by delivering a scheme with excellent 'green' credentials and an advanced level of sustainability performance. Through team collaboration managed by the project sustainability consultant, a simple energy & sustainability strategy has been established to ensure the change of use incorporates the appropriate measures and approaches to realise this aspiration.

### 1.2.1 Energy Strategy Development

The purpose of an energy strategy is to set out the overall structure and options for reducing the Development's energy demand and CO<sub>2</sub> emissions as it moves forward through the various stages of design development. The strategy is based on the principles of the energy hierarchy whereby energy demand is reduced as far as possible in the first instance. As the application involves minimal changes to the existing building and the space being fitted out by the operator will be unheated and uncooled, the scope for reducing energy demand and CO<sub>2</sub> emissions is limited, noting that energy demand will already be low for the completed scheme.

It is anticipated that over the course of the design and fit-out stages of the Development regulatory requirements, technical solutions, and their carbon reduction / cost effectiveness are likely to change. Therefore, some of the specific energy saving measures

proposed now may be replaced by an alternative measure or combined with an additional technology that enables the scheme to improve its carbon performance.

As the change of use does not include heating or cooling, the scheme is exempt from Building Regulations Part L and therefore no energy modelling or assessment is required.

### **1.2.2 Sustainability Strategy Development**

Sustainability is at the core of the Development design proposals. The sustainability strategy has been developed by the project team to deliver a cohesive, inclusive and resource-efficient environment that promotes both societal and environmental health.

As part of the strategy development and implementation, there is a reiterative process of communication and collaboration with the project team to help inform development proposals, the cost plan and decision-making. Additionally, there are procedures in place to monitor and report progress against the sustainability targets throughout the process.

This statement sets out the over-arching approach to sustainability adopted by the Development, and the multi-faceted benefits that can be realised through sustainability measures are highlighted throughout each chapter. It demonstrates compliance with relevant local policies on sustainable design and construction and gives due consideration to Camden's aspirations in terms of low carbon growth and climate change resilience.



## 2 Policy Context and Local Drivers

### 2.1 Climate Emergency and Net Zero Carbon

The London Borough of Camden Council have declared a 'Climate Emergency'. There is an aspiration to achieve a Net Zero Carbon borough by 2030, 20 years ahead of the national target. It is expected that both new development and refurbishments will actively contribute to this.

In June 2020, Camden approved a 5-year 'Climate Action Plan' which creates a framework for action across all aspects of the borough with the aim of achieving zero carbon by 2030. Objectives and actions that affect The Atrium Basement include:

- From 2020, require all major developments in Camden to be zero carbon (London Plan definition).
- From 2020, require all major developments in Camden to calculate whole life carbon emissions to include all operational and embodied carbon.

### 2.2 Policy Drivers

As this is a change of use planning application and the refurbishment of an existing building not all policies are relevant. As the development is located within a basement with no external area there is no scope to impact local biodiversity. The policies outlined below have been considered as part of the sustainability and energy strategy development:

Camden Local Plan Policies	New London Plan Policies
C1 Health & wellbeing CPG Planning for health and wellbeing C5 Safety and security C6 Access for all	D5 Inclusive Design D11 Safety, security and resilience to emergency
A4 Noise and vibration	D 14 Noise
CC4 Air quality	SI 1 Improving air quality
CC1 Climate change mitigation CC2 Adapting to climate change CPG Energy efficiency & adaptation	SI 2 Minimising greenhouse gas emissions SI 3 Energy infrastructure SI 4 Managing heat risk
CC5 Waste	SI 7 Reducing waste and supporting the circular economy
CC3 Water and flooding	SI 5 Water infrastructure

	<p>SI 12 Flood risk management</p> <p>SI 13 Sustainable drainage</p>
<p>Policy T1 Prioritising walking, cycling and public transport</p> <p>Policy T2 Parking and car-free development</p>	<p>T1 Strategic approach to transport</p> <p>T2 Healthy Streets</p> <p>T5 Cycling</p> <p>T6.1 Residential Parking</p>

## 3 Sustainable Design & Assessment

### 3.1 BREEAM Assessment

Following submission of the application, the tenant has confirmed that the space will not be heated or cooled. Given the very limited works being undertaken by the Applicant for the change of use, Parts 1, 2 and 3 of the BREEAM Refurbishment & Fit out Assessment would no longer be applicable. Only Part 4 would apply which relates to interior design, which is the responsibility of the tenant and not the Applicant.

It is also worth noting that the change of use will not result in additional floor area.

Subsequently, it is considered that the policy requirement for BREEAM is not applicable to this application.

### 3.2 Materials

#### 3.2.1 Reuse of materials

As the development is an existing structure there is a significant amount of material that will be reused.

During construction Contractors will be required to prioritise the use of hoarding/enclosure fencing made from recycled materials (such as recycled plastic hoarding) or reused from other sites (if timber, these will comprise 100% legally sourced products such as FSC accreditation).

#### 3.2.2 Environmental impact of new materials

The materials specification will be important in terms of balancing the requirements of the design brief with the requirements for buildings with a low environmental impact.

The ongoing design will encourage proposed construction materials to have regard for selecting materials and components with reduced embodied carbon and low environmental impact. For instance, this could be through carrying out life cycle assessments or selecting materials that score well under The Green Guide to Specification. The Green Guide is a reference website and electronic tool providing guidance for designers and their clients on the relative environmental impacts for a range of different building elemental specifications. The ratings within the Guide are based on Life Cycle Assessment, using the BRE's Environmental Profile Methodology.

Other considerations when specifying materials include resilience to climate change (as discussed in Section 5) and the Global Warming Potential (GWP) of insulation products.

Careful materials selection will not only support the overall sustainability strategy for the Development but will demonstrate compliance with Camden's aspirations in this area.

### 3.2.3 Responsible sourcing

This issue will mainly be managed by the Contractor teams as part of their procurement strategy. However, in order to demonstrate the Applicant's commitment to responsible sourcing of materials, requirements relating to this issue will be defined within tender information lead contractors will be expected to produce a sustainable procurement plan.

Contractors and specifiers will be encouraged to source timber in accordance with the UK Government's Timber Procurement Policy. Additionally, if appropriate local supplies are available, the Development will aspire to use timber which is reclaimed, including during construction. Both measures will ensure the sustainable use of wood within the Development.

Where possible, for all other materials the contractor will be required to prioritise the use of suppliers with a current accredited environmental management system (EMS) in place over those suppliers that don't.

## 3.3 Waste

Waste would be generated by the Development at two stages. Firstly, the construction of the Development itself has the potential to generate waste. Secondly, users and visitors to the completed Development would also generate waste as phases become operational. The waste types that would be produced at The Atrium Basement Place would broadly include:

- demolition and construction waste;
- commercial waste;
- municipal solid waste; and
- green/food waste.

### 3.3.1 Circular Economy

The current industry and policy emphasis is a shift from the 'linear' waste economy (essentially raw materials are manufactured for a single use item before being discarded at the end of its life) to a more 'circular' economy, with the ultimate goal being New Zero Waste.

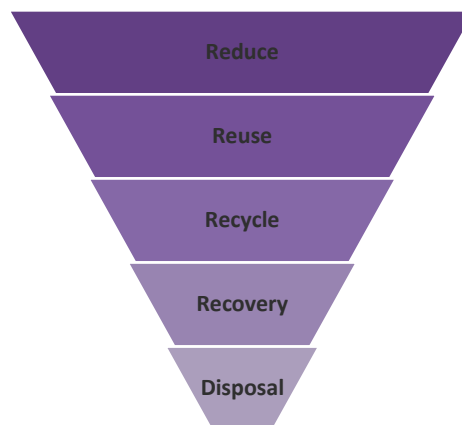


As strip-out works are due to take place on the site, the Applicant will carry out a pre-refurbishment audit of the site. This will identify whether there are any opportunities for re-use of materials on site and therefore contribute to the circular economy. Where material reuse is possible works this will be exploited in order to reduce the amount of new materials used in the Development, and to also reduce the amount of waste being exported from the site.

### 3.3.2 Waste management strategy – overall concept

At a more 'local' scale, the Site waste management strategy aligns with the waste hierarchy (shown right) with the aim to:

1. First, minimise the amount of waste produced; then
2. Re-use as much as possible of that which is generated; then
3. Recycle so that materials can be used to make new products; then
4. Recover value from that waste which cannot be re-used, for example, through composting and energy from waste; and lastly
5. Dispose of residual waste through landfilling or incineration without energy recovery.



### 3.3.3 Waste management strategy – construction

#### Construction

The Applicant is committed to ensuring that the Development achieves exemplary performance for waste management by setting challenging resource efficiency targets, to

be included as part of a best practice Resource Management Plan. The targets will relate to minimising waste generation and to diverting waste from landfill through reuse and recycling. It will be the responsibility of the contractor to put in place procedures to sort and reuse/recycle construction waste in order to seek achievement of these targets wherever possible.

#### **3.3.4 Waste management strategy – operation**

Given that the use of the building revolves around the provision of an experience rather than a physical item, it is anticipated that there will be little waste generation. That which does arise is likely to be from the retail and refreshment areas, which can be more than accommodated through the existing arrangements for waste disposal that will be in line with existing stables market waste collection strategy. The existing waste arrangements are all compliant with the Camden waste requirements.

## 4 Climate Resilience

Camden Council has declared a Climate Emergency. The UK's second Climate Change Risk Assessment (CCRA)<sup>1</sup> was published in January 2017 by the government. It identifies the following key risks for UK where more action is needed:

- Risks to health, well-being and productivity from prolonged high temperatures causing overheating;
- Risks of shortages in the public water supply, and for agriculture, energy generation and industry, with impacts on freshwater ecology;
- Flooding risks to communities, businesses and infrastructure;
- Risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- Risks to domestic and international food production and trade.

The risks to buildings in urban locations mainly relate to rising temperatures and changing rainfall patterns, which are exacerbated by extreme weather events that are hard to predict and therefore manage. Designing for climate resilience is becoming increasingly common and we as a team must consider it a duty of care to ensure as far as possible the development remains safe and fit for purpose throughout its lifespan, regardless of the climate.

Design measures to enable the site and the buildings to adapt to changes in climate have been explored throughout this strategy document and as such climate change adaptation is not considered as a stand-alone issue. However, measures to specifically manage risks relating to external overheating, water supply and flooding are discussed in this chapter.

### 4.1 Overheating

The tenant / operator has confirmed that areas of the façade at ground level which are open may be utilised to provide some natural ventilation to the space below. However, it is the Applicant's understanding that some background ventilation will be required to supplement this. As the application is for space at basement level, there are no opportunities for incorporating further passive design measures. No mechanical cooling is proposed.

### 4.2 Water Supply

To address potential shortages of supply of potable water priority must be given to reducing water demand at source. This includes both buildings and the external landscaping.

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<sup>1</sup>[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/584281/uk-climate-change-risk-assess-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf)

The existing washroom/WC facilities are to be retained with no further installation proposed. All bathrooms / washrooms / Superloos and non-domestic showering facilities will use water efficient sanitaryware (e.g. low flush WCs, low flow taps and showers, etc.).

#### **4.3 Flood Risk and Drainage**

Surface water flooding is an immediate risk for any site in central London. Pluvial flooding tends to occur following intense rainfall events when water cannot soak into the ground or enter drainage systems. The site is currently protected by fluvial (river) flooding from the Thames by the Thames Barrier.

As the site is an existing development and there is no change to the area of hard landscaping there is no increase in the rate of surface water run-off.



## 5 Energy Strategy

This chapter summarises the limited opportunities to ensuring low energy demand and CO<sub>2</sub> emissions as far as practicable, noting that the application is for a change of use..

### 5.1 Energy Efficiency

The first stage of the energy hierarchy is the reduction in energy demand through the use of passive design and lean measures. As the development is located within an existing basement there is less impact to be seen from fabric performance.

#### 5.1.1 Passive measures

Building fabric standards are important for new developments but as this is a sub structure development there is less impact from the building fabric as heat loss is not as significant.

No changes are proposed to the existing building envelope. However, should new elements be specified by the tenant's fit out works, high fabric performance standards will be encouraged with target u-values that will exceed Building Regulations Part L minimum standards.

#### 5.1.2 Active measures

Active demand reduction measures aim to minimise the energy consumed by building services through installing high efficiency plant, recovering heat, providing intelligent controls, and metered energy consumption. The following measures have been reviewed as a means of keeping the energy demand of the building low. These measures will be encouraged to be implemented by the tenant and their fit-out designers and contractors with a view to aligning with the relevant best practice guidance at that time.

#### Ventilation and Heat Recovery

The tenant will be encouraged to utilise Mechanical Ventilation with Heat Recovery (MVHR) to meet the continuous ventilation needs of the space in line with Part F of the Building Regulations.

#### Low Energy Lighting

It is assumed low energy LED lighting will be proposed throughout in both internal and external areas, including landlord areas to minimise the associated electrical demand and potential additional summer cooling load.

#### Building Management System

As there will be minimal building services installed it is unlikely that a full BMS will be installed. However, the tenant will be encouraged to sub-meter where appropriate to monitor energy use.

## 5.2 Renewable Energy

As this is a change of use application for a sub-surface space with no heating proposed, there is no opportunity for installing renewable energy technologies.

## 6 Health and Wellbeing

The physical health & mental wellbeing of people is a complex connected and inter-dependent system, affected by genes, social and economic circumstances, the quality of relationships and the value and purpose of work. Wellness is greatly affected by our physical environment, both indoors and outdoors, and by our connection to nature. Promoting societal health and wellbeing will enable communities and individuals to live healthy, happy lives.

For the development this means ensuring users and visitors and local people have sustainable transport options, and where possible open green space for recreation and relaxation.

Many factors contribute to physical and mental health and wellbeing. As an example:

- Access to natural amenity e.g. good air quality, daylight and sunlight
- Access to nature (internal and external): greening and biophilia, natural materials, images of nature
- Comfort conditions (internal and external): temperature, humidity, noise, odours
- Inclusive and accessible spaces (internal and external)
- Security and safety
- Access to knowledge: data, news, local information, etc.

As the development is located within an existing basement there is limited scope to alter the local area to improve the health and wellbeing. However, the follow measures have been incorporated into the design:

- Provision of new retail space, which would support new employment in the Borough.
- Safety and security (visitors, staff and local residents). Visual signs of security such as CCTV cameras and/or security staff can deter crime and disorderly behaviour and increases a person's sense of safety.
- Indoor air quality monitors and controls to detect poor levels of O<sub>2</sub>, high levels of CO<sub>2</sub> and humidity, T° increases, etc., and alert building manager / BMS.
- Where possible the fit-out design will aim to incorporate biophilia (living plants).

## 7 Local Pollution

It is the intention of the applicant to minimise as far as practicable the impact of the change of use on the local environment. This will be achieved through the implementation of measures (where applicable and appropriate) to control pollution and to avoid a negative impact on local environmental indicators, as far as practicable.

The potential impacts and mitigation measures proposed by the change of use are summarised in this section. Mitigation with regards to demolition and construction activities will form part of the Construction Environmental Management Plan (CEMP). The plan will include measures to comply with relevant legislation and guidance (including the Environment Agency's PPGs) and best practice measures in line with the Considerate Contractors Scheme.

For detailed information please refer to the relevant reports submitted with the planning application.

### 7.1 Air Pollution

Wardell Armstrong have undertaken an air quality assessment for the development. A review of the 2019 Annual Status Report (ASR) for LBC (the latest report available on its website) indicates that the entire borough has been declared as an Air Quality Management Area (AQMA). The AQMA has been declared for exceedance of the annual mean objective for nitrogen dioxide (NO<sub>2</sub>) and the 24-hour mean objective for fine particulate matter (PM<sub>10</sub>).

The proposals are for the alteration of the existing basement levels only and it has been confirmed that the required construction works will all take place internally.

A review of relevant guidance has been undertaken to consider the potential for significant effects during the construction phase of the proposed development. The review takes into account guidance from the Mayor of London<sup>3</sup> and the Institute of Air Quality Management (IAQM)<sup>4</sup>.

It is considered that, with site-specific mitigation measures in place, there will be a 'not significant' residual effect associated with dust and PM<sub>10</sub>. Mitigation measures will be included within the Construction Environmental Management Plan (CEMP), which will be prepared for the site.

The proposed change of use will provide a family entertainment space in the form of an escape room venue. It has been confirmed by the client that no car parking is proposed, due to the central location and the good accessibility of the site in terms of public transport.

A review has been undertaken, in accordance with relevant guidance, to consider the potential for air quality impacts during the construction and operational phases of the proposed development. This review suggests that any effects should not be significant and that significant changes to vehicle and building emissions are not expected.

## 7.2 Light Pollution

The external lighting strategy has yet to be fully developed but will be designed to limit night-time pollution by minimising upward lighting as far as possible. The strategy will be further developed as part of the detailed design of the site and of each phase and will follow best practice /BREEAM guidelines where applicable.

## 7.3 Construction Environmental Management Plan

It is essential to the Applicant that the environmental impacts of the construction works are mitigated as far as practicable. The project team will work with the contractor teams to assist in the development and implementation of measures to support this commitment. This will include a requirement for lead contractors to have an accredited environmental management system (EMS) in operation, and to develop a construction environmental management plan (CEMP) that exceeds standard practice to include procedures for monitoring and recording resource use.

As an example, this could include the following:

- Monitor, report and set targets for energy use arising from site activities;
- Monitor, report and set targets for water consumption arising from site activities;
- Monitor and record data on transport resulting from delivery of the majority of construction materials to site and construction waste from site;
- Adopt best practice policies in respect of air (dust) pollution arising from site activities;
- Adopt best practice policies in respect of water (ground and surface) pollution occurring on the site.

## 8 Sustainable Transport

As the development is an existing site, it is expected that the existing transport infrastructure will be utilised. The site is located within Camden Market which has an excellent connection to forms of sustainable transport. As the development will not be creating incremental floorspace and there are no anticipated additional incremental trips there is no new transport infrastructure proposed. All customers will fall within the existing patterns which rely heavily on public transport.

The development has been input into the TFL PTAL tool which confirms that it achieves a high rating of 6a thereby demonstrating its high accessibility.

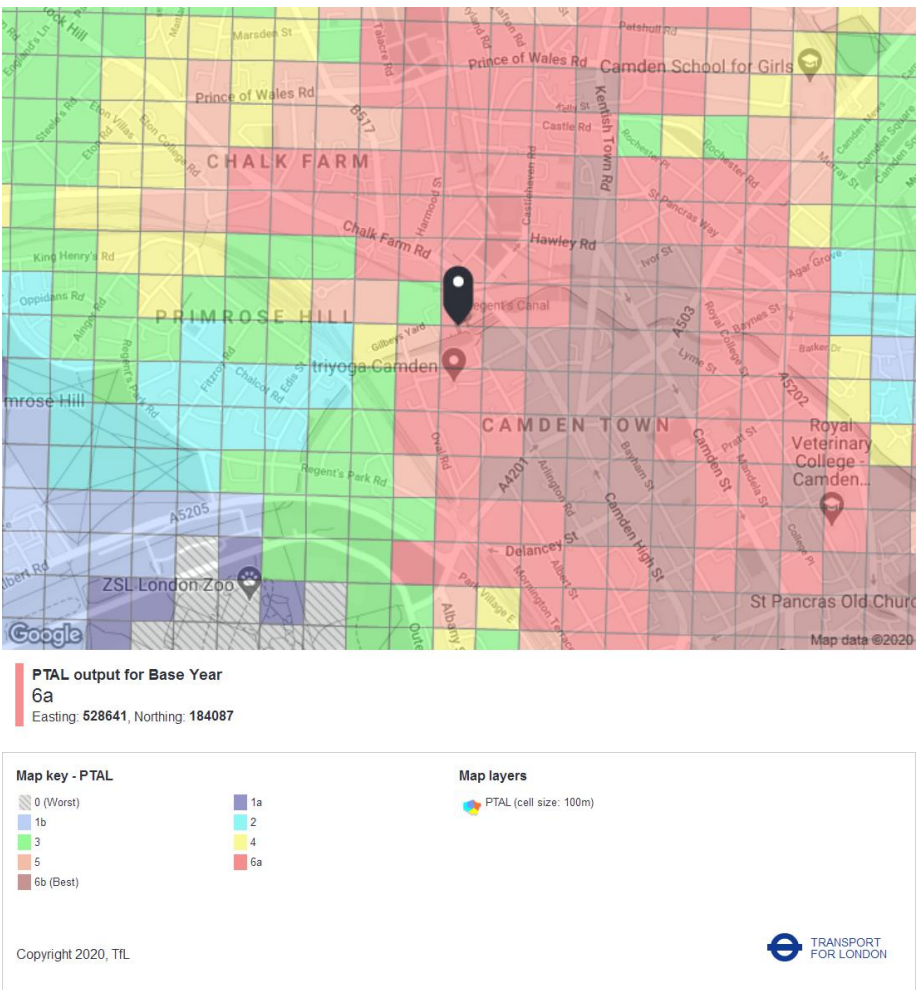


Figure 8-1 Development PTAL rating

The site will be car-free which is in line with Camden’s aspirations to be a car-free borough.

## 9 Conclusion

A sustainability strategy has been developed for the proposed change of use of The Atrium Basement in accordance with the sustainability objectives and low carbon growth ambitions of Camden Council; who have set out a comprehensive range of policies to underpin their response to climate change and resource management.

Key opportunities for implementing sustainability and CO<sub>2</sub> reduction measures and solutions appropriate to the Development have been identified. This has ensured that the design proposals are aligned with policies relevant to sustainable design and construction and will meet, or where viable exceed, policy requirements.

Subsequently, the Development demonstrates the following sustainability performance indicators:

- A low carbon building with low energy demand.
- Low water use washrooms/WCs to reduce demand at source;
- A site that will create a safe and healthy internal environment;
- A site that, as far as possible, will be resilient to the impacts of future climate change;
- The use of best practice construction site management procedures across the site;
- The fit-out will have minimal disruption to neighbours due to the works predominantly taking place at substructure level. If appropriate, the fit out contractor will be encouraged to target an exemplary performance under the Considerate Constructors Scheme.

These indicators are proposed at an outline level with the intention of being further developed by the tenant as the fit out detail is designed.

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