



Building A Basement

Labtech/ Stanley Sidings Ltd

Sustainability Statement

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1 Introduction

1.1 Development Overview

The Proposed Development is seeking consent for Change of use of basement (light industrial use) and lower ground floor (market retail and hot food takeaway use) of Building A1 to Electric Go-Kart Use (sui generis).

The proposals involve the conversion of Levels B1 and Lower Ground within Building A1, Hawley Wharf to a 1855sqm purpose-built go-kart facility. No increase in floor area is proposed. The site is currently fitted out ready for market retail & F&B occupation, including fully fitted self-contained retail units and food market style commercial kitchens at both lower ground and basement levels. It should be noted that these units have never been occupied.

The proposed works include the removal of non-essential equipment, retail partitions and open circulation stairs, the transfer of 4 no. existing columns and adaptations to existing essential MEP services. New go-kart ramps will also be installed to allow the track to run continuously between the basement and lower ground levels.

The proposed scheme will be developed to shell only to enable the proposed operator to fit out to their requirements. The proposed operator has won multiple awards for their existing indoor circuit in East London.

1.2 Planning Policy Context

The development proposals and approaches take into consideration the key local policies relating to sustainable design and construction, focusing on the following documents:

- Camden Local Plan 2017
- Camden Planning Guidance (CPG) Energy efficiency and adaptation, January 2021
- CPG Planning for health and wellbeing, January 2021
- London Plan 2021

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	London Plan 2021 Policies
C1 Health & wellbeing CPG Planning for health and wellbeing C5 Safety and security	D5 Inclusive Design D11 Safety, security and resilience to emergency

C6 Access for all	
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 SI 12 Flood risk management SI 13 Sustainable drainage
Policy T1 Prioritising walking, cycling and public transport Policy T2 Parking and car-free development	T1 Strategic approach to transport T2 Healthy Streets T5 Cycling T6.1 Residential Parking

1.3 Sustainability Strategy

Despite the limited scope of works, the Applicant is keen to demonstrate environmental and social responsibility by adopting good practice measures to deliver a sustainable change of use.

This statement sets out the approach to sustainability adopted by the Proposed Development, and the benefits that can be realised through sustainability measures are highlighted throughout each section. 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.

This document should be read in parallel with the other reports and drawings submitted with the planning application.

2 Waste & the Circular Economy

2.1 Circular Economy Principles

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.



Figure 2.1 – Principles of a circular economy

The key principles of a circular economy have been considered by the Proposed Development.

2.1.1 Circular Economy Approach for the Existing Site – Strip-Out and Demolition

It should be noted that the proposals do not involve the demolition of the building structure, although four internal columns and a number of partitions will need to be removed to open up the floorplates.

A pre-'demolition' audit will be undertaken to identify potential materials, fixtures, fittings, and equipment with enough value for reuse. This may include items or materials with basic reuse value or architectural value.

The outcome of the audits would be a schedule that would categorise and quantify the potential materials that are available for reuse. The schedule will be shared with the Operator's design team and fit-out contractor to enable them to identify opportunities for onsite recovery, in line with the waste hierarchy.

Non-hazardous demolition waste will be diverted from landfill through reuse, recycling, and recovery. Actions to avoid waste being disposed of in landfill include:

- Reusing the material on site (in situ or for new applications)
- Reusing the material on other sites
- Community reuse and recycling
- Salvaging or reclaiming the material for reuse
- Returning material to the supplier via a 'take-back' schemes
- Direct recycling of materials via a specialist material reprocessor or recycler
- Recovery of the material from site by an approved waste management contractor and recycled or sent for energy recovery
- Utilising waste in exempt or permitted applications (not landfill).

2.1.2 Circular Economy Approach for the Proposed Development

Minimise Material Waste

The Proposed Development is being constructed to shell only. The design has taken into consideration the durability of any new construction materials to limit the need for repair and to avoid premature replacement as far as practicable. The Operator will be encouraged to adopt the same approach with regards to the fit-out.

Material Efficiency

The Applicant has and will continue to examine opportunities to implement appropriate measures to ensure that the amount of materials used in the conversion of the proposed development are optimised, and therefore reduce the amount of construction waste arising from site. The Operator will be encouraged to adopt the same approach with regards to the fit-out.

Minimise Construction Waste

The Proposed Development will aim to meet a target for waste reduction which will not exceed $\leq 7.5 \text{ m}^3$ or ≤ 6.5 tonnes per 100 m^2 Gross internal floor area.

Design for Adaptability and Disassembly

By removing partitions, moving columns, and opening up the stair, the proposed development will create a large open space which creates opportunities for accommodating future changes of use to the building over its lifespan.

Sustainable Procurement of Materials

Consideration will be given to establishing a plan for the responsible sourcing of construction products to guide procurement through the conversion works by all involved in the specification and procurement of construction products.

The main contractor will be encouraged to prioritise the use of suppliers with a current accredited environmental management system (EMS) in place over those suppliers that do not.

Where timber is used, this will be responsibly sourced in accordance with the UK Government's Timber Procurement Policy. i.e. FSC or PEFC only. Where possible and available, timber which is locally reclaimed, including during construction, will be used.

The Operator will be encouraged to adopt the same approach with regards to the fit-out.

2.1.3 Circular Economy Approach for Municipal Waste During Operation

The proposed conversion makes space allowance for dedicated, sufficiently sized waste storage for general refuse and recyclables, located in appropriate, accessible locations. The waste management strategy aligns with the requirements of Camden Council.

Non-recoverable waste streams will be colour coded and clearly labelled to help waste producers and the landlord Facilities Management (FM) team responsible for transferring the waste to collection points to ensure that they place waste in the correct storage units.

The Operator will be encouraged to make arrangements for dry recyclables to be segregated from other waste. Bins and bags will be colour coded and clearly labelled to help waste producers and the FM team responsible for transferring the waste to collection points to ensure all recyclable waste is placed in the correct waste storage units.

The FM team will be responsible for communicating with the tenant on the requirements for transferring waste and recycling to the storage facility, including the requirements for bulky and non-standard waste. The waste store and individual zones within the store shall be clearly labelled at all times.

The FM team will be responsible for the collection of all residual recyclable and specialist waste streams from the development.

3 Sustainable Design and Resource Use

3.1 BREEAM Assessment

The proposed operator 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 not 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 Camden's policy requirement for BREEAM is not applicable to this application.

3.2 Energy & CO₂

The proposed conversion will effectively result in a sheltered external space. Capped off services will be provided for the Operator to connect to as part of their fit-out; however, the space will not use energy to condition the indoor climate.

As such, the project Approved Inspector has deemed the development to be exempt from the requirements of Building Regulations Part L.

The proposed works to change the use of the site involves some modifications to essential building services systems. There will be an element of natural ventilation facilitated via the open facades. There is an existing extract system providing some background ventilation to the basement and a smoke extract system that will be modified to suit the proposed operator use. However, the energy consumption associated with these essential systems is low.

As the final fitted out space will be unconditioned i.e. no heating or cooling, the largest consumer of energy will be the lighting. This will form part of the tenant fit out who will be encouraged to install best practice energy efficient systems.

3.3 Water

The existing WCs and hand wash basins are proposed to be retained as part of the proposed conversion.

Any new sanitaryware or other water consuming equipment and fittings will form part of the tenant fit out. The Operator will be encouraged to go beyond Building Regulations Part G compliance to install ultra-efficient WCs, urinals, taps, etc in order to reduce water demand as far as possible.

4 Sustainable Travel

It is expected that the existing public transport infrastructure will be utilised by staff and visitors to the facility. The site has an excellent connection to a range of sustainable transport nodes and has been assigned a PTAL rating of 6b (the best possible rating) by TfL thereby demonstrating its high accessibility.

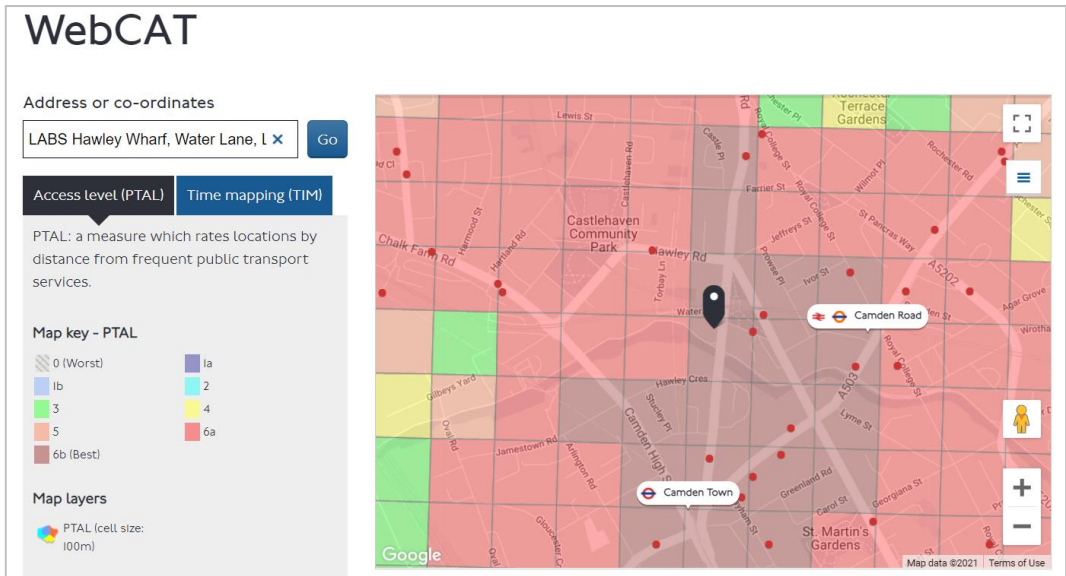


Figure 4-1 Development PTAL rating

Condition 32 of the masterplan development (ref: 2020/0362/P) approved 150 cycle spaces across the development. Users of Building A and the Proposed Development will have access to these spaces.

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

5 Local Impacts

It is the intention of the Applicant to minimise as far as practicable the impact of the Proposed Development on the local environment. This will be achieved through the implementation of measures 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 strip out, demolition and construction activities 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.

5.1 Air Pollution

A basic air quality assessment has been carried out by Wardell Armstrong in accordance with the Camden Planning Guidance for Air Quality (March 2019).

Construction Phase Impacts

The proposals are for the conversion 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 and the Institute of Air Quality Management (IAQM).

It is considered that, with site-specific mitigation measures in place, there will be a 'not significant' residual effect associated with dust and PM10. Mitigation measures will be included within the Construction Environmental Management Plan (CEMP), which will be prepared for the site.

Operational Phase Impacts

The proposed change of use will provide an indoor electric go-kart track. It has been confirmed by the Applicant that no car parking is proposed, due to the central location and the good accessibility of the site in terms of public transport. In addition, good footpaths and street lighting are present along Camden High Street and the walking routes to the closest stations.

The Proposed Development will be unheated and therefore no new heating plant will be required. It has also been confirmed by the Operator that the go karts will be powered by electricity, and therefore are not considered to be a source of pollution.

Air Quality Neutral

The proposals are for a change of use to an existing building. No car parking is proposed at the site due to nearby public transport links and no significant change to delivery vehicles is expected. In addition, no new heating plant is proposed. As a result, it is considered likely that there will be no significant change to existing vehicle and building emissions at the premises.

Summary

A review has been undertaken, in accordance with relevant guidance and policy, 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.

5.2 Noise

The acoustic impact of works particularly related with the structural modifications requiring coring & percussion drilling will need to be evaluated and adequately managed to ensure impacts on neighbouring building occupants are limited. It is expected that good practice measures will be adopted by the contractor as part of their construction management plan.

Due to the subterranean location of the application site (Levels B1 and Lower Ground) it is expected that noise egress from the facility will be limited. Further attenuation measures would form part of the tenant fit-out, if required.

No external building services plant is proposed.

5.3 Flood Risk

The site is currently protected by fluvial (river) flooding from the Thames by the Thames Barrier.

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

The current drainage strategy remains unchanged by the proposed change of use.

6 Conclusion

A sustainability strategy has been developed for the proposed change of use of the Building A 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 CO₂ reduction measures and solutions appropriate to the Proposed 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 Proposed 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 promotes sustainable forms of travel and will be car-free;
- 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.

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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