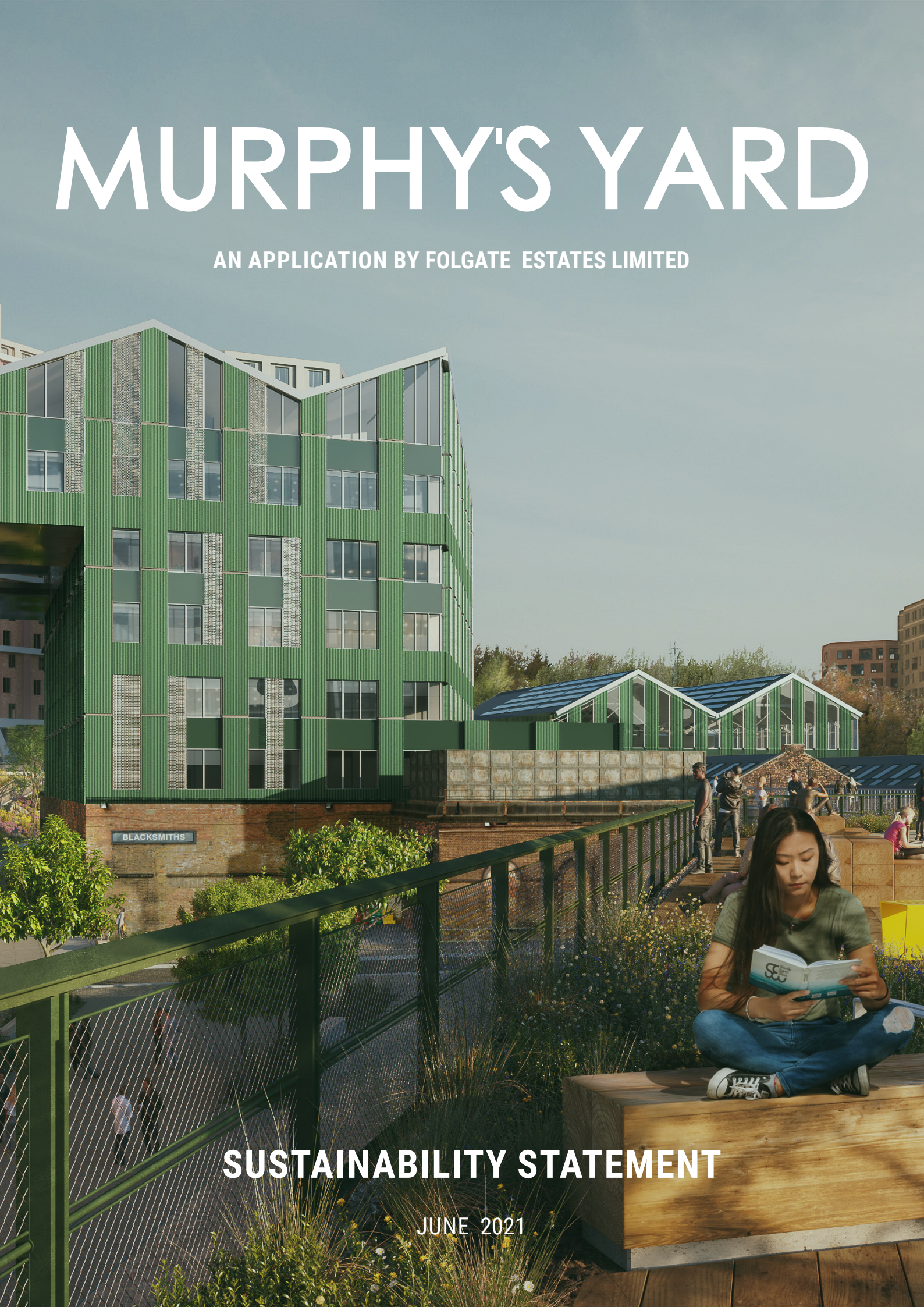
MURPHY'S YARD

AN APPLICATION BY FOLGATE ESTATES LIMITED



SUSTAINABILITY STATEMENT

JUNE 2021


FOLGATE
ESTATES
LIMITED

Studio
Egret
West

dp9

TRIUM

ARUP

HOARE LEA

curtins

KM
Development
Consultancy

PETER
STEWART
CONSULTANCY

KANDA

ELEMENTA

BURO HAPPOLD

stace

Cast

AVR
LONDON

rps

DS2

arbeco

CUSHMAN &
WAKEFIELD

AND

CMS

Quod

The
Ecology Consultancy

IAN FARMER
ASSOCIATES

HEDGE

Volterra

AQA

SANDY BROWN
ASSOCIATES

Audit sheet.

Rev.	Date	Description of change / purpose of issue	Prepared	Reviewed	Authorised
0	21/05/2021	Final Issue.	J. Drane/ A. Bryant	R. Harper	M. Wilkinson
01	15/06/2021	Update for Planning Submission	J. Drane	R. Harper	M. Wilkinson

Project number: 07/10172
Document reference: REP-0710172-08-AB-20210615-Murphy's Yard Sustainability Statement-Rev1

Contents.

Executive Summary.

This document presents the Sustainability Strategy for the Murphy's Yard development which has been informed by both national and local policy requirements, the Applicant's vision and sustainable design and development guidance and frameworks including, but not limited to.

- United Nations Sustainable Development Goals (UN SDGs);
- London Plan;
- Camden Local Plan:
- BREEAM New Construction 2018;
- Murphy's Sustainability Strategy and Commitments

To capture the multi-faceted sustainability benefits and values that the Proposed Development can bring to the site, local community, surrounding businesses, and future building users, five defined factors – the people, the building, the social network, the natural environment, and the economic aspects – inform our proposed sustainability framework. These are summarised below:

Physical Capital – "Building the Future"

The aspiration for the proposed development is for it to be an innovative net-zero carbon scheme embedding resilience and longevity in building design.

A low carbon all-electric building services strategy in proposed to enable ongoing carbon emission reductions from the decarbonisation of the grid. During concept design development, the energy strategy for the site will endeavour to meet current adopted and emerging carbon emission reduction targets set within the local and regional planning policies. The design team will consider a 'performance' rather than 'compliance' led approach to design to assist the Applicant in achieving the measured reductions in carbon emissions in operation.

Social Capital – "Connecting People"

The proposal is for an accessible and well-connected development that delivers social value to the wider community

Murphy's will continue to engage with the local community and relevant stakeholders throughout the life span of the development to ensure the Proposed Development responds to the community needs.

The contractor will seek employees associated with the construction stage in a fair and just manner to ensure diversity and equal opportunities are provided on site.

Economic Capital – "New Opportunities"

Enabling sustainable growth through the creation of jobs and opportunities through collaboration with the main contractor, local community groups and education facilities, the Proposed Development can create new career opportunities and reduce the skills and training gaps in the local area.

Modern and sustainable employment will be created- supporting business, delivering additional jobs, affordable workspace, industrial, warehouse and creative uses

Material and other resource procurement will endeavour to be sourced locally to support local suppliers and other businesses.

Human capital – "Happy and Healthy"

The user health and wellbeing are at the centre of design and specification to ensure a comfortable environment is created and make the Proposed Development a place where people want to be and work – both now and in future climates.

Natural capital – "Positive impact"

All aspects of the design, construction and operation of the Proposed Development will be developed to have no negative impact on the environment. Key considerations relate to pollution, local air quality, resource demand, waste and biodiversity.

These considerations, alongside the target of net zero carbon, will contribute to minimising and mitigating any contribution that the development on climate change.

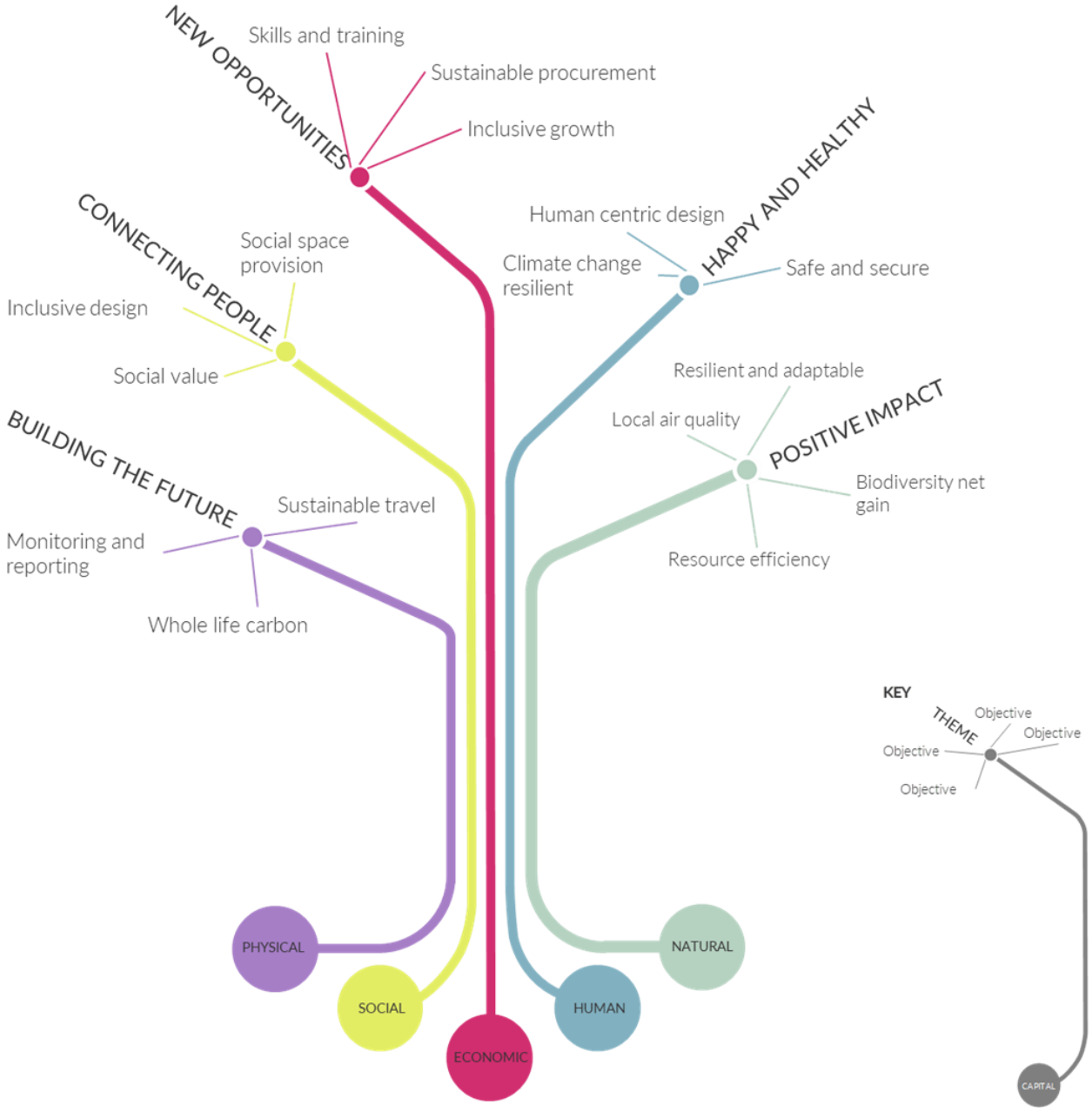


Figure 1: Approach to sustainability for the Murphy's Yard development.

1. Introduction.

1.1 Purpose of the report.

This document has been prepared on behalf of Folgate Estates, hereafter referred to as the 'Applicant', in support of the outline planning application for redevelopment of Murphy's Yard, Camden hereafter referred to as the 'Proposed Development'.

The Sustainability Statement summarises the pertinent regulatory and planning policies applicable to the Proposed Development and sets out how the Proposed Development addresses the relevant policy requirements.

This report outlines the proposed approach to sustainability. Please to refer to:

- Appendix A: For an outline response to the Local Policy requirements.
- Appendix B: For a detailed review of relevant planning policy requirements.

1.2 Description of Development.

Outline planning permission with all matters reserved for the demolition of existing buildings and structures and redevelopment to be carried out in phases (with each phase being an independent act of development) comprising the following mix of uses: residential (Use Class C3), residential institution (Use Class C2), industrial (Use Class B2 and/or B8), commercial floorspace (Class E), flexible commercial and Sui Generis floorspace (Use Class E and/or Sui Generis Use), Community (F1 and/or F2), Sui Generis, and cycle and vehicle parking, refuse and recycling storage, plant, highway and access improvements, amenity space, landscape and public realm improvements, and all associated works

1.3 Site Description.

The site (Murphy's Yard) is located between Kentish Town and Gospel Oak, within the London Borough of Camden, a predominately residential area towards Gospel Oak and commercial area towards Kentish Town Road, with historic pubs, neighbourhood shops, and global eateries alongside a growing number of health food spots, cafés, and bars. Highgate Road runs to the east of the site, where The Forum hosts big-name concerts, leading to Parliament Hill Fields and Hampstead Heath, offering an expansive natural landscape.

Murphy's Yard is a large industrial site of approximately 15.5 acres located in the northern part of Kentish Town, forming part of the Kentish Town Planning Framework Area. The Regis Road Growth Area lies to the South of Murphy's Yard, with the two sites separated by train tracks. The site is a designated LSIS with a small array of industrial buildings, located on the site and along eastern boundary at Highgate Studios which accommodate a variety of small businesses, creative industries, and leisure activities.

Please refer to figure 2 for an illustrative view of the Proposed Development.

Table 1 Outline Development Areas by Land Use (sqm GEA).

Space Type	Maximum Floor Area (sqm GEA)
Domestic	85,200 (including ancillary areas)
Non-domestic:	95,000
Total:	180,200

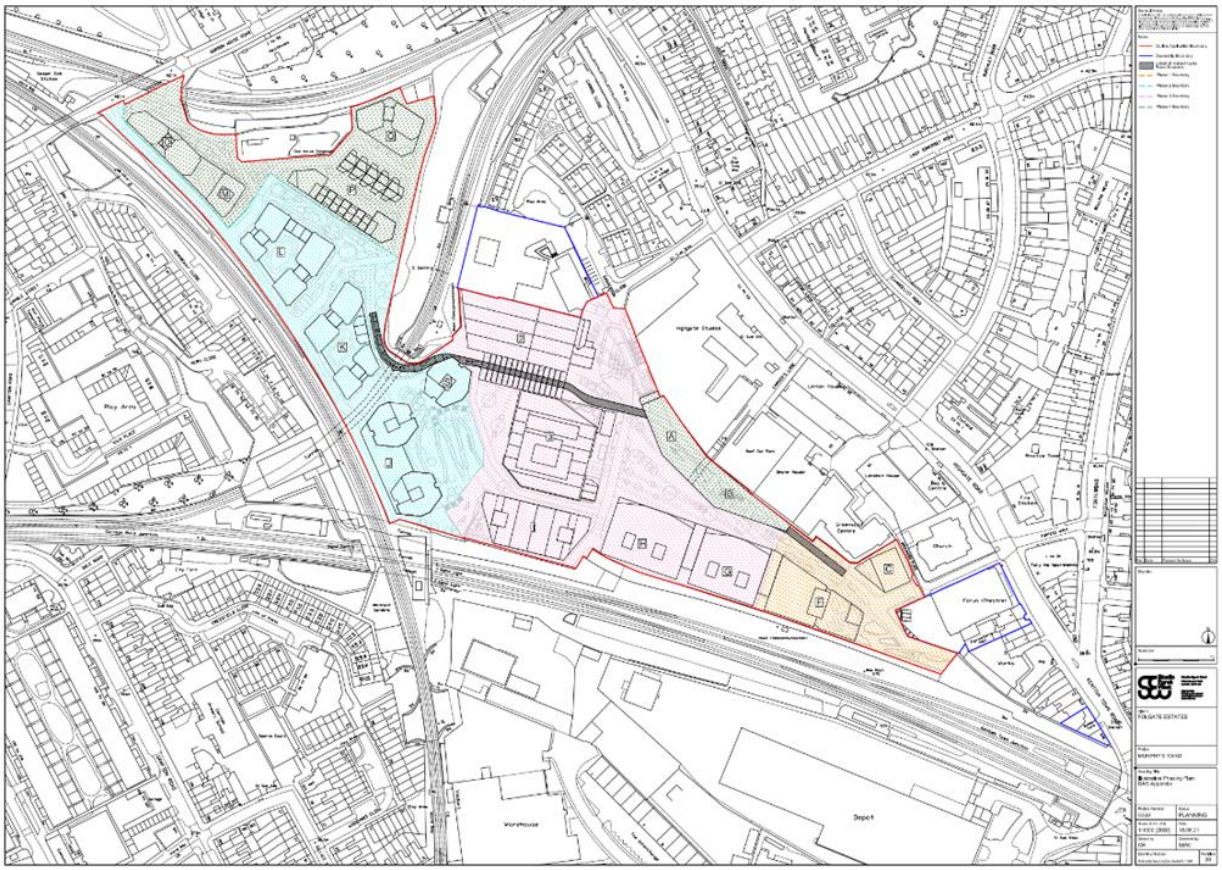


Figure 2: Illustrative view of the Proposed Development (Credit: SEW Architects).

2. Overview of Policies and Drivers.

2.1 The Applicant's Vision.

2.1.1 Environmental Policy (August 2019)

- Minimise the environmental impact of our activities by protecting the environments in which we operate and minimising pollution in all forms
- Minimise waste in design, construction and use
- Minimise fuel, energy and water use
- Protect wildlife and habitats, archaeological remains and heritage buildings
- Seek innovative and cost-effective business solutions
- Regularly measure and review the effectiveness of our safety, health, environmental, sustainability and quality performance
- Regularly set objectives and targets to achieve continual improvement
- Engage, influence and collaborate with stakeholders to encourage the spread of sustainable technologies and services throughout our supply chain
- Contribute to community improvement and charitable projects.
- Seek to eliminate the causes of ill health through design and by identifying effective controls on site

2.1.2 Murphy's Sustainability Strategy (September 2020)

Murphy's take a holistic approach to sustainability and social responsibility. Striving to build more resilient infrastructure and more durable, low-carbon assets. By working with their supply chain and clients, they are minimising landfill waste, material and water use, while increasing recycling opportunities and trialling new products with high-recycled content.

Murphy's have committed to the following, as a strategic sustainability narrative:

"We will improve lives by making a difference through climate action and adding social value, and every part of our business will deliver responsibly, safely and leave a positive legacy in the communities where we work."

They are committed to the following targets shown in Figure 3 around Climate Action:

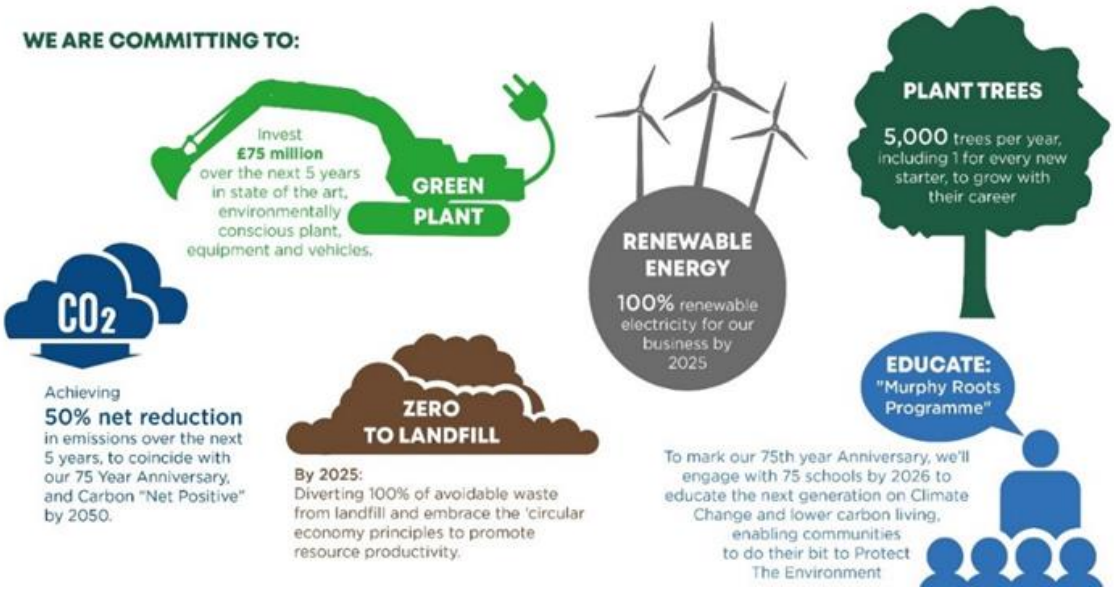


Figure 3 Murphy's Climate Action Commitments

Many of Murphy's commitments extend to the local community and the impacts of Social Value as shown in Figure 4.

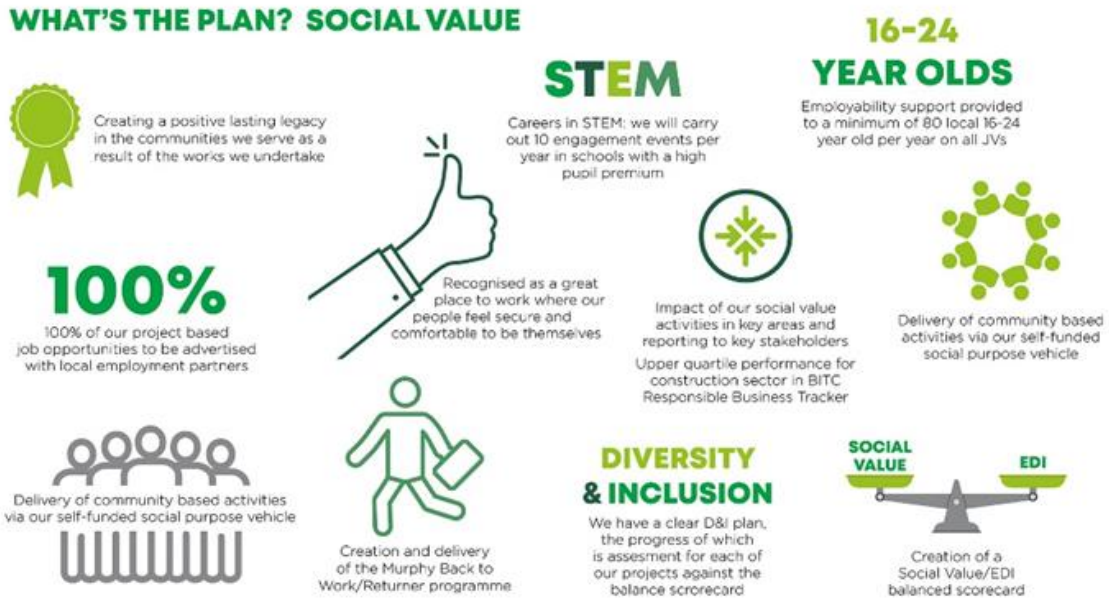


Figure 4 Murphy's Social Value Commitments

2.2 Relevant National and Local Policies.

A detailed policy review has been undertaken and can be found in Appendix B of this report.

In summary, planning policy documents applicable to the Proposed Development have been identified and include the following:

- National Planning Policy Framework (NPPF) (June 2019)

- London Plan (2021)
- GLA Draft Energy Assessment Guidance (2020)
- Camden Local Plan (2017)
- Camden Energy Efficiency and Adaption (2019)
- Kentish Town Neighbourhood Plan (2016)
- Dartmouth Park Neighbourhood Forum Neighbourhood Plan (2020)
- Draft Site Allocations Document (2019)

2.2.1 Key findings

Key targets from these documents are summarised below:

- Achieve BREEAM 'Excellent' rating as a minimum.
- All domestic and non-domestic development to be Net Zero Carbon (taken to mean a 100% reduction in regulated CO_2 emissions from the relevant Building Regulations baseline).
- Minimum 35% on-site CO_2 emissions reduction.
- Credit breakdown to ensure: 60% of the un-weighted credits are targeted within in the Energy and Water category's, and 40% in Materials.
- Minimum 15% (non-residential)/10% (residential) reduction in regulated CO_2 through energy efficiency measures.
- Achieve or exceed air quality neutral standards;
- Contribute to net gain in biodiversity;

Figure 5: Policy documents.

3. Approach to Sustainability.

The following strategy addresses a wide range of sustainability subject areas and covers various headline sustainability categories. The strategy confirms the applicable policies and the Applicant's aspirations and measures of sustainability that would be implemented at the Proposed Development.

The design of the Proposed Development is based on sustainable design and construction principles as informed by planning requirements and industry best practice. It is on this basis that we are utilising a sustainability framework based on five defined factors; i.e., the people, the buildings, the social network, the natural environment, and the economic aspects as illustrated in Figure 6 to capture the multi-faceted sustainability benefits and values that the proposed development could bring to the following areas:

- Application Site,
- Local community,
- Surrounding businesses, and
- Future building users.

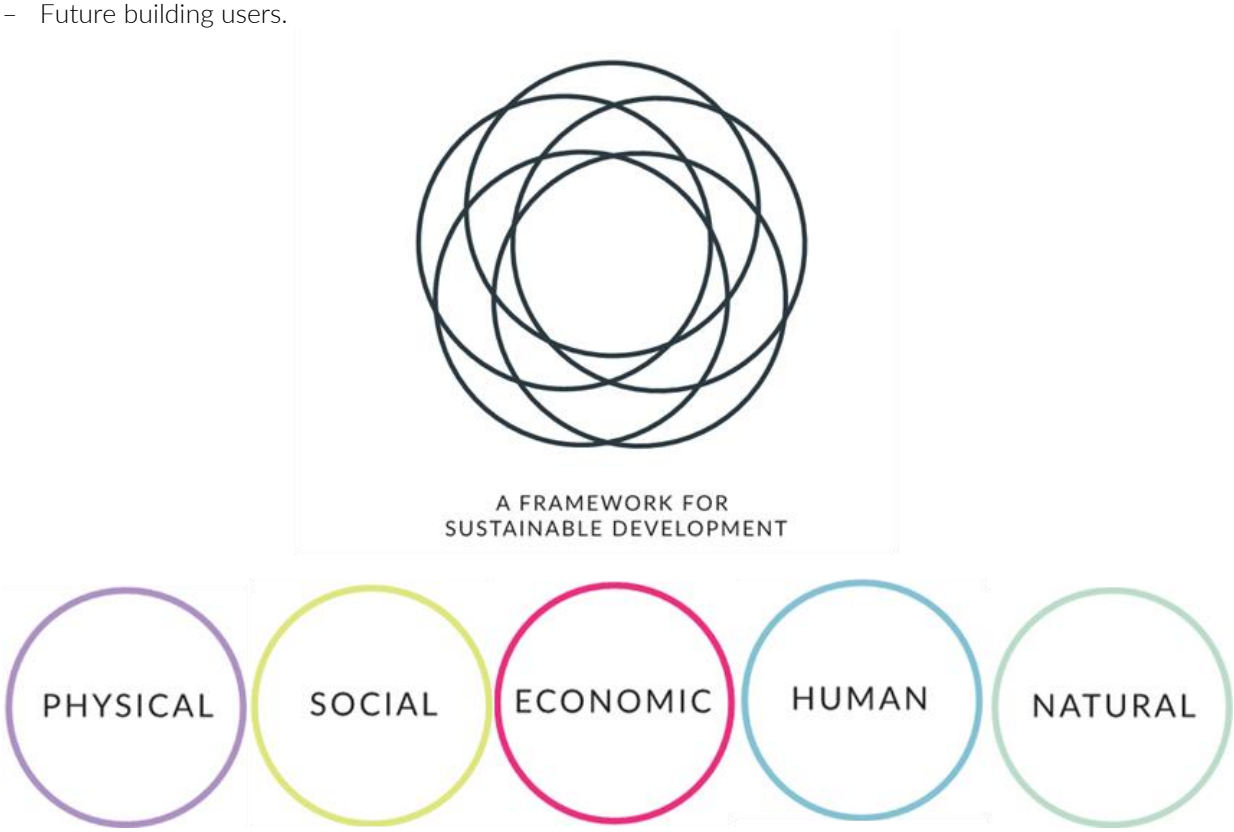


Figure 6: Proposed framework for sustainability – Creating value.

The original idea for the five capitals was introduced by Forum for the Future and it was designed to assist organisations to develop a vision of what sustainability looks like for their operations, products and services. We have embraced this approach as it promotes a holistic, interdisciplinary approach to sustainability which is aligned with our understanding of sustainable development.

Our strategy is based on the concept of realising real term social, economic and environmental benefits to all stakeholders and investors and thereby generating value and wealth in the communities we create.

Table 3: Five Capitals.

Physical Capital	"Building the future" Creating high quality buildings ensures PHYSICAL VALUE is increased where buildings and infrastructure project an image of design for longevity and allow people to navigate easily on foot/by bicycle.
Social Capital	"Connecting people" By enabling community identity, SOCIAL VALUE is increased where a great place brings people together and creates a community.

Economic Capital	"New opportunities" By ensuring equity for all, ECONOMIC VALUE is increased where all users of a place feel they have a level of ownership of the asset and buy-in to the outcomes it is seeking to achieve.
Human Capital	"Happy and healthy" With a focus on people, HUMAN VALUE is increased where quality and longevity of life is improved, and happiness is increased.
Natural Capital	"Positive impact" By seeking to achieve positive gain, NATURAL VALUE is increased where existing quality is protected, and new complementary resources are introduced.

The Delivery Framework

Working with all key stakeholders, an overall vision for the development has been defined. Workshops have been held in collaboration with the client and project team to help create a charter including innovative initiatives and key objectives to be delivered as a result of the project. As illustrated in Figure 6 and Figure 7 the strategy responds to the five elements of our defined framework; and is intended that the agreed objectives are tracked and monitored throughout project delivery and operational phases.

Environmental Assessment

In line with local policy drivers and the Applicant's sustainability aspirations, a BREEAM will be targeted for the commercial areas with an aspiration to achieve BREEAM 'Excellent' in line with local planning policy.

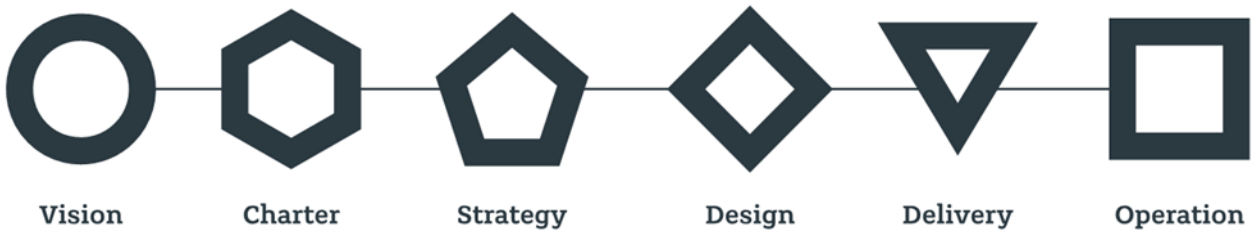


Figure 7: Sustainability strategy – Delivery phase (inception to completion).

4. Sustainability Strategy.

The design of the Proposed Development is based on high sustainability aspirations and is compliant with industry best practice. In addition, it also attempts to push the boundaries of conventional construction by deploying innovative methods and approaches during design and construction. The strategy for the Proposed Development addresses key sustainability challenges and opportunities, responds to the requirements of the applicable policies, and implements the Applicant's aspirations.

It embraces the Five Capitals framework, responding to the challenges of climate, biodiversity and health and wellbeing, UN sustainable development goals and Applicant vision, aiming to create long term value and generate a flow of environmental, social and economic benefits. Each Capital has been contextualised to the specific needs, challenges and opportunities arising from the Proposed Development, resulting in five themes as follows:

- Physical capital – Building the Future
- Social capital – Connecting people
- Economic capital – New opportunities
- Human capital – Happy and healthy
- Natural capital – Positive impact.

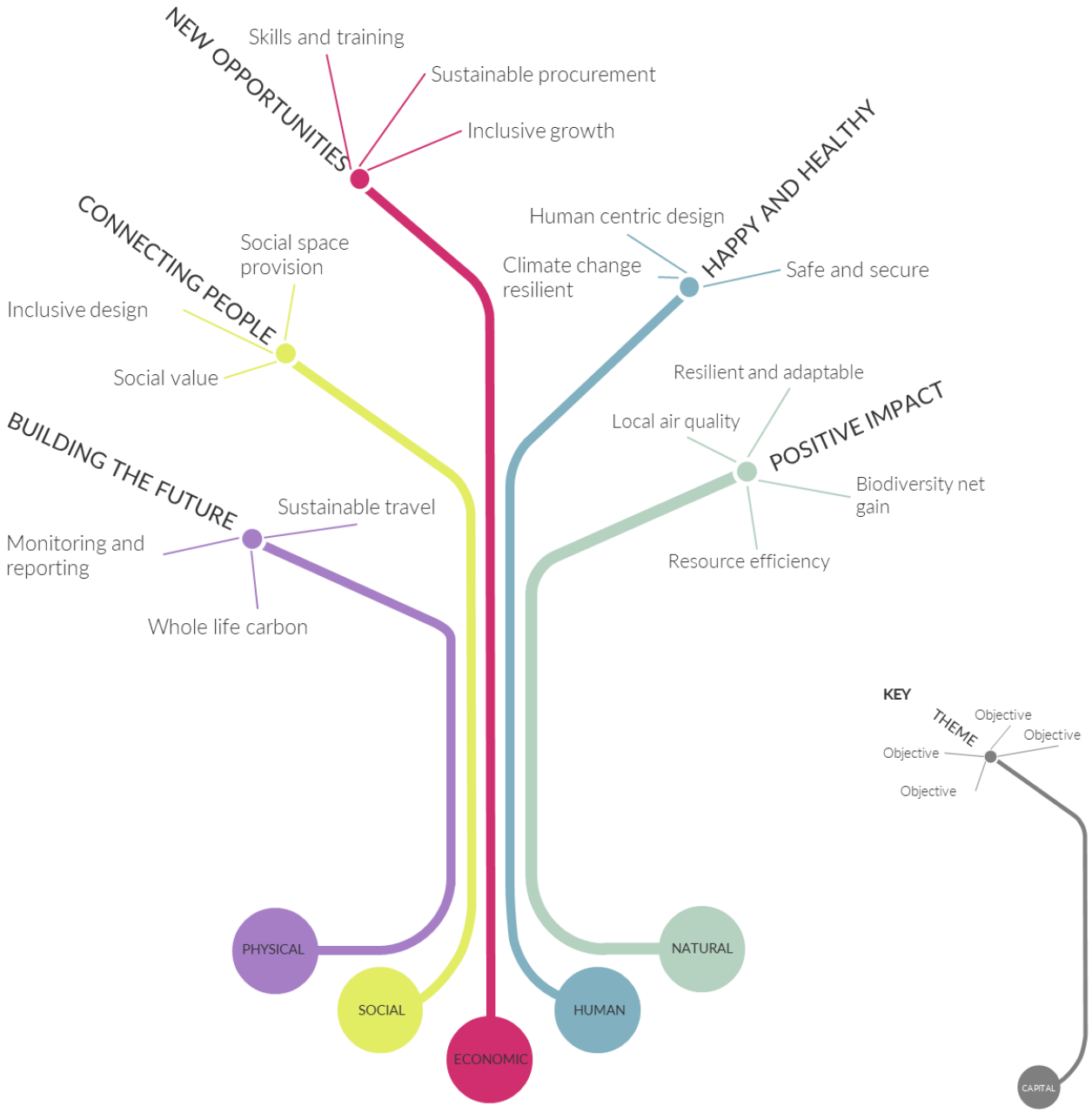
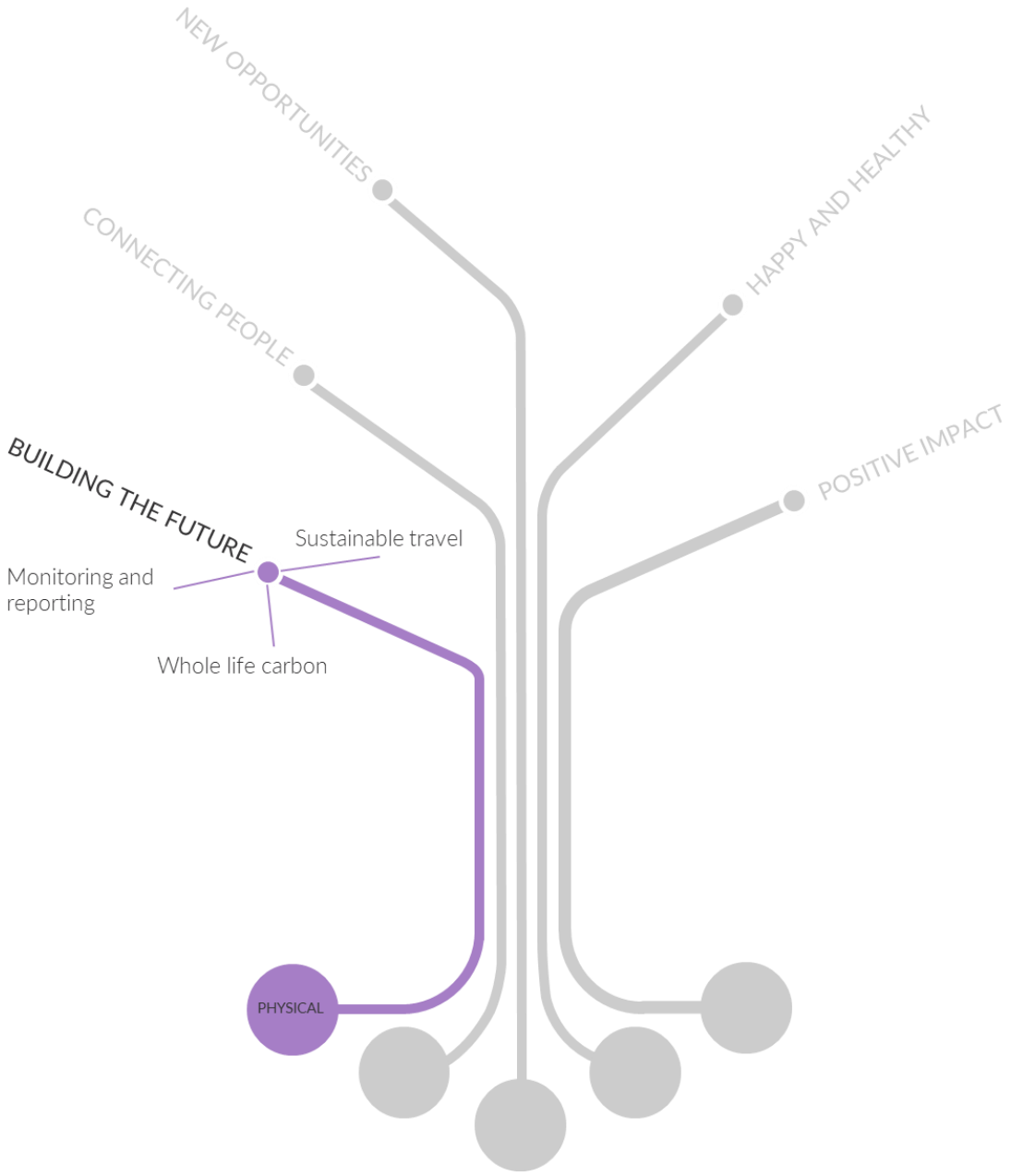


Figure 8: The sustainability strategy illustrated – key themes and areas.

4.1 Physical Capital – "Building the Future".



Whole life carbon

The assessment of Whole Life Carbon (WLC) emissions consists of the following sections: total operational carbon emissions (regulated plus unregulated); embodied carbon emissions; and any future potential carbon emissions 'benefits', post end-of-life, including benefits from reuse and recycling of building structure and materials.

An assessment will be undertaken in line with the draft GLA guidance for undertaking WLC Assessments and therefore in line with the RICS Professional Statement: Whole Life Carbon Assessment for the Built Environment.

Where deemed most feasible, the development will aim to reduce embodied carbon by reusing structural elements of the existing buildings on site, by maintaining levels on site and through the omission of a basement. Material considerations have also given priority to whole life carbon,

considering the embodied carbon, the maintenance and durability of the material and the ease of reuse or recycling of the material.

Monitoring and reporting

Effective energy metering will be enabled by the provision of suitable infrastructure within the buildings services systems. This will enable energy usage of the heat-pump systems to be monitored, and the system performance optimised. Electrical and thermal meters will be provided on the main central Heat Pumps, providing data on plant energy consumption throughout the year.

Each tenant area and each area of high energy load will be sub-metered in order to monitor energy consumption in greater granularity and facilitate billing and reporting. Energy intensity and carbon emissions will be monitored and reported annually.

The Applicant is committed to monitoring and reporting sustainability performance and data every year in a transparent way.

Sustainable travel

A key principle of the proposed development is to significantly increase the permeability of the site for pedestrians and cyclists and to enhance these links with high-quality public realm. This includes the provision of routes through the site linking Greenwood Place, Sanderson Close and Gordon House Road. The primary pedestrian and cycle spine through the site is referred to as the Heathline and provides a connection between Highgate Road (via Greenwood Place) and Hampstead Heath (via Gordon House Road).

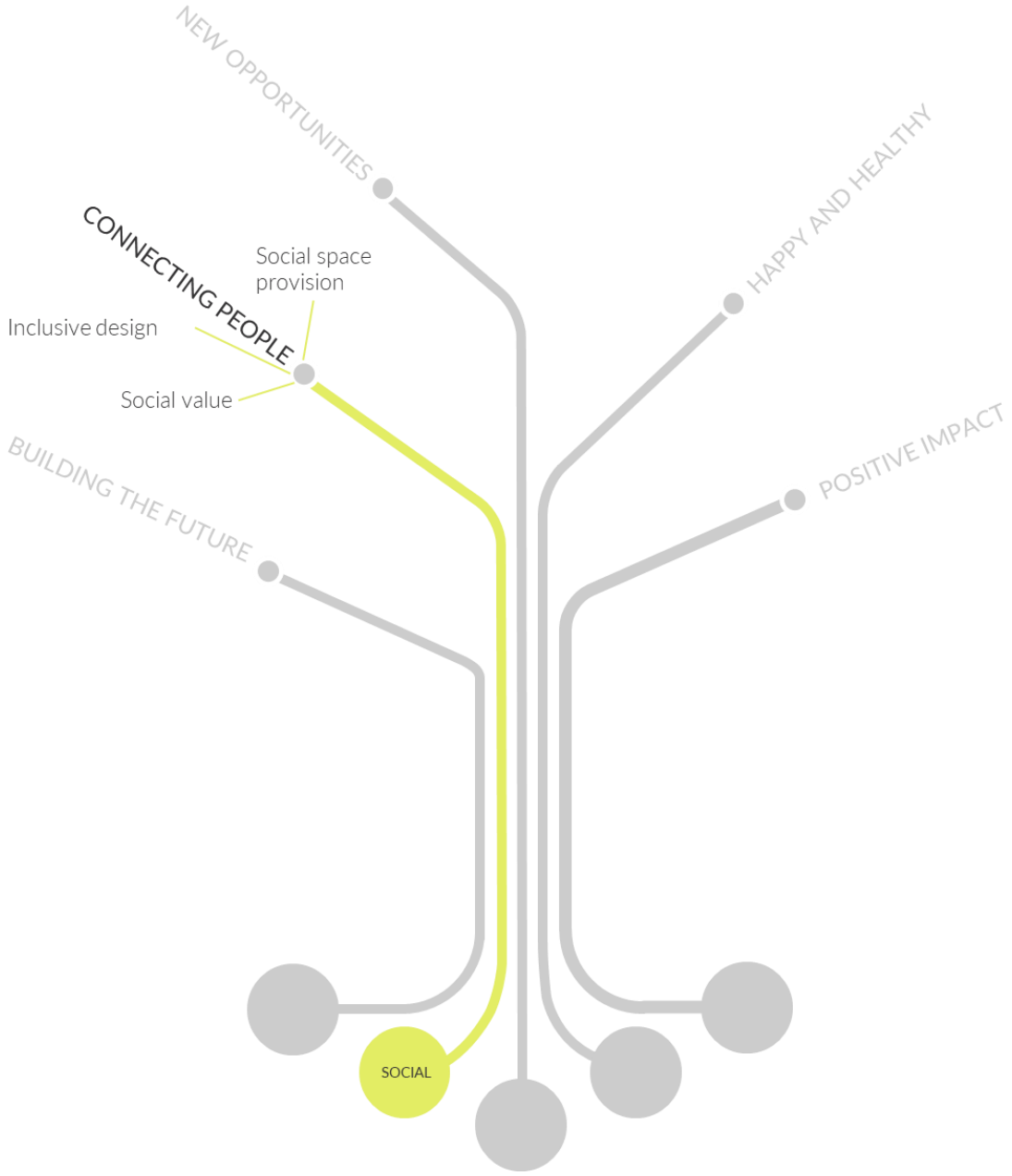
A Framework Travel Plan document has been completed by Curtins which has outlined a 'long-term management strategy for an occupier or site that seeks to deliver sustainable transport objectives through positive action and is articulated in a document that is regularly reviewed.

This plan will be used to inform the long-term management of the site, ensuring the most appropriate and suitable measures are selected and utilised where feasible.

'Smart' Design

Principles associated with the Designing for Disassembly and Adaptability have been considered throughout the initial process, a requirement to embed material circularity within the building design will be included and consideration of thermal comfort will steer the design to a comfortable and productive work and retail environment.

4.2 Social Capital – "Connecting people".



Inclusive Design

The Proposed Development will seek to ensure enable community identity and social cohesion through placemaking. This includes design decisions enabling the integration of people with different needs and abilities such as wheelchair and pushchair access, highly visible doors, non-slip mats and automatic doors.

The scheme will add value to the local community, its activities and economic outputs by taking a holistic view on the short- and long-term needs of occupants and the wider community.

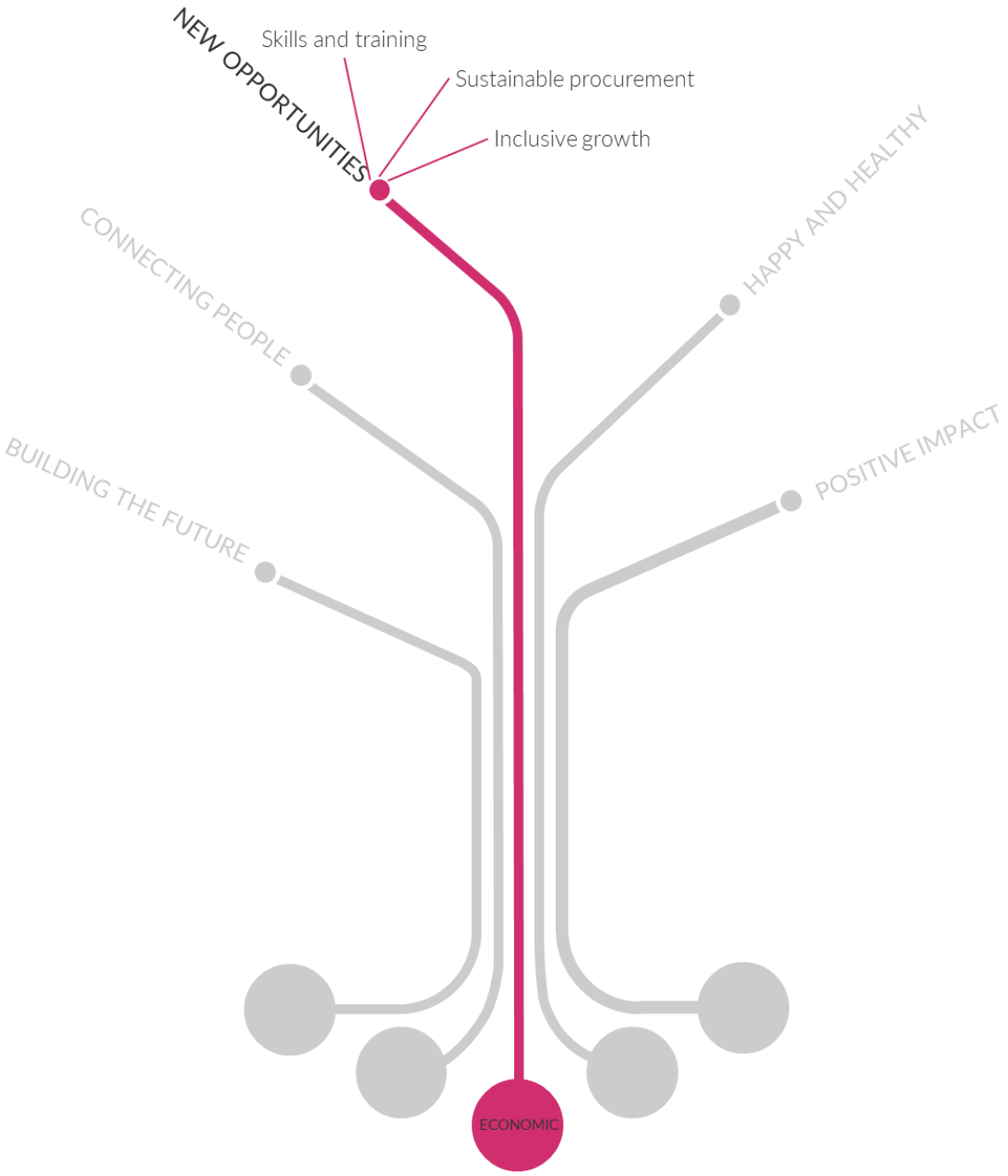
Opportunities to engage with the local community will be explored at the design, construction and operational stages of the Proposed Development, which will include initiatives such as reaching out to existing community-led stakeholder forums and participation in community programmes in Camden through direct investment or in-kind contribution, targeting the creation of local employment, more opportunities for disadvantaged people and improved training opportunities for young people.

Social infrastructure
To promote interaction and social cohesion, the Proposed Development will seek to deliver accessible and flexible spaces open to building users, i.e. open reception space, café and supermarket. The scheme will look at promoting safe access and movement around the site through the inclusion of safe cycle paths, dedicated footpaths, as well as improved integration. Outside space will be enhanced, providing a place for building users during coffee or lunch breaks to gather, socialise, relax and connect with the natural environment.

Improved public realm
The Proposed Development improves the outdoor space at ground level and on the buildings to provide a setting that is active, inviting and enjoyable. A safe and legible mix of routes around the site boundary will be provided to open the site up into its local context.

Social Value
The development will seek to create an inclusive and accessible place which welcomes all via a diverse offer which compliments rather than competes with local social, economic, and cultural infrastructure. In addition, the scheme will ensure a respectful approach to neighbouring properties, responding to overlooking and views. Shaping buildings with consideration to their townscape and heritage impact, as well as provide a catalyst for wider growth futureproofing and facilitating neighbouring development, opportunities via a flexible framework approach, safeguarding future connections to adjacent development parcels, without compromising their development potential.

4.3 Economic capital – "New opportunities".



Inclusive Growth

In view of the fact that the Proposed Development is an multi-faceted scheme, in addition to employment during construction, the Proposed Development will also be sure to generate a significant number of employment opportunities during the operational stage associated with the improved and increased area of office, industrial and retail uses it introduces.

The Development will seek to craft long-lasting and adaptable spaces that will allow for appropriate and well-considered opportunities for business growth and change as required by the rapidly shifting socio-economic climate.

The office floorplate will be designed to be as flexible and adaptable as possible, allowing tenants to make best use of the space as well as meet their needs and demands. This design feature will not only encourage longer leases but will offer a sense of ownership for building users.

Local procurement

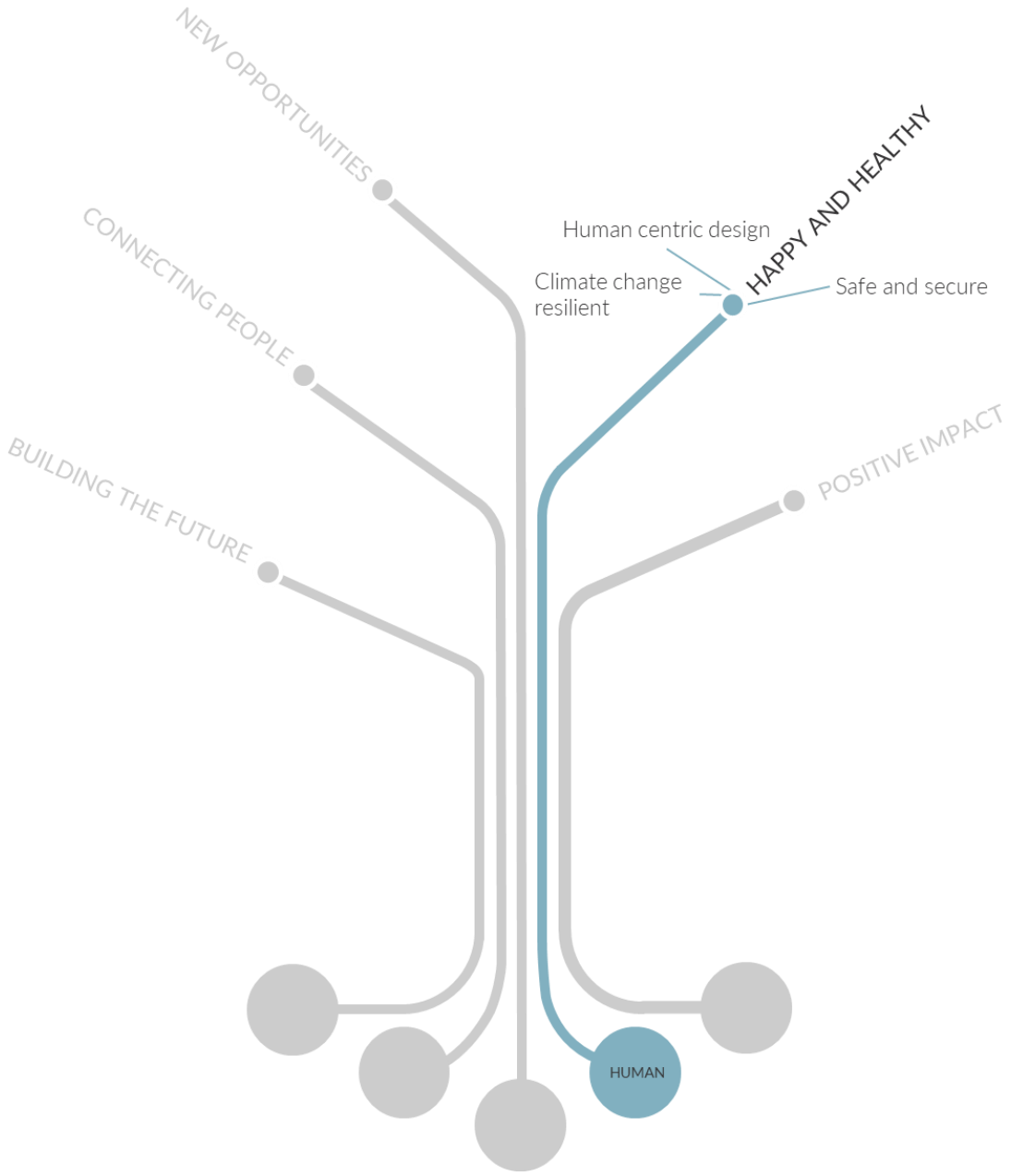
To deliver whole life value and promote economic sustainability, the use of local workforce and local suppliers during construction and operation will be encouraged. More specifically, the Proposed Development will prioritise local suppliers, preferably small and medium sized businesses based within the London Borough of Camden, where possible. Apart from the obvious benefit of supporting local business, local procurement offers a wide range of other potential advantages. Local sourcing can offer greater control over the supply chain, higher levels of flexibility and predictability, lower environmental footprint and reduced supply chain cost.

Fair operating practices

The Proposed Development would be delivered in a working environment that adheres strictly to ethical business practices. All directly and indirectly employed staff (including apprentices/trainees) in an environment within the Applicant's control (Tier 1 and 2 of the supply chain) will be paid at or above the London Living Wage.

Human rights risks will be effectively monitored through a comprehensive ongoing risk management process including measures such as the delivery of modern slavery training to all employees in a procurement role, workforce engagement surveys and supplier risk mapping.

4.4 Human capital – "Happy and Healthy".



Human-Centric Design
Human capital incorporates a wide range of considerations relating to health, knowledge, skills, intellectual outputs, motivation and capacity for relationships of the individual. The Proposed Development aims to create a positive and healthy place that actively promotes the wellbeing and productivity of its building users with enlivened lower areas and humane workplaces above.

To ensure best practice in visual performance and comfort for building users, Biophilia will be maximised where possible throughout the landlord areas providing a visually pleasing environment to occupy.

The internal layout will consider the placement of stairs and point-of-decision signage (to encourage stair use) encourage physical activity and enable serendipitous collaboration points. The design will seek to enhance natural daylight throughout all occupied spaces.

Easily accessible and visible cycle spaces at ground level, provided in the quantum required by the London Plan, will also encourage active commuting for staff and visitors.

The Proposed Development will consider the thermal comfortability of each space, ensuring ongoing reference is made to key design practises such as CIBSE Guide A / CIBSE TM52: Avoiding overheating in European buildings. Further, acoustic comfort will be optimised to meet the performance criteria contained in BS 8233:2014.

Connection to Nature

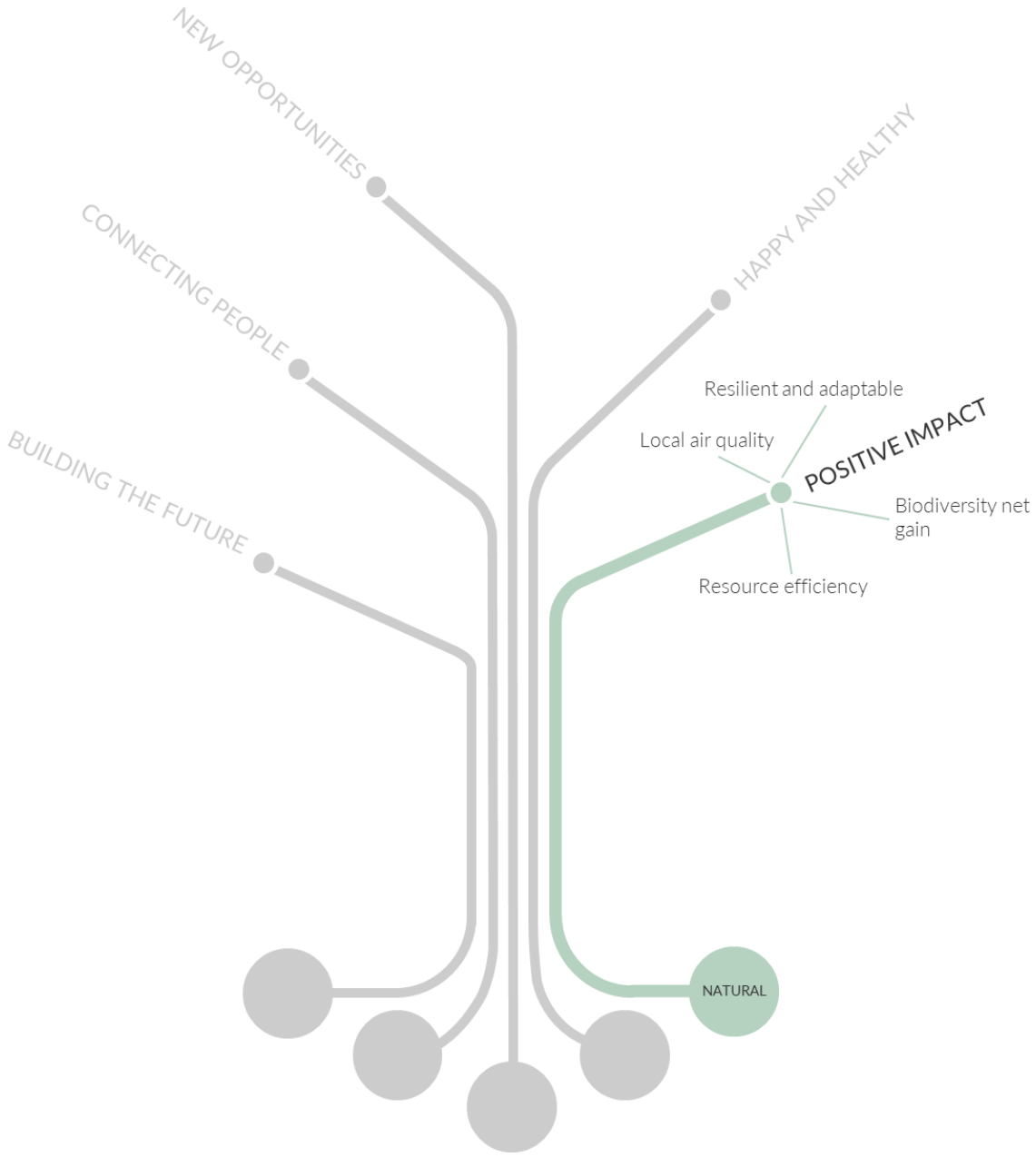
In line with the developments Human Centric Design, the Proposed Development will seek to maximise the natural environment throughout external areas. All existing ecology will be maintained in accordance with best practises, and new ecology will be carefully selected in order to maximise the sites ecological value and improve habitat and biodiversity.

Appropriate management and maintenance strategies will be thought out and executed, informing the future occupants on how to maintain the status of the biodiversity into building life cycle.

Safety and Security

Security measures will be considered and adopted site wide, ensuring an appropriate level of safety is merged into the final design. Recommendations such as design and layout (e.g. crime prevention through environmental design), physical security (e.g. tested and certified security products), and technological security (e.g. Tested and certified alarms, automatic access control systems, CCTV) will be considered reducing the risk of crime to both people and property, as well as improve the health and wellbeing of the building occupiers by limiting stress from the fear of crime.

4.5 Natural capital – "Positive impact".



Biodiversity Net Gain
The development will seek to create an ecologically rich and colourful landscape, extending Hampstead Heath through to Kentish Town. Supporting healthy living, offering generous green amenity spaces aimed at greening, healing and cleaning the urban landscape

Biodiversity will be maximised throughout the scheme where feasibly possible, improving biodiversity net gain throughout the design establishing long term biodiversity for the site and the surrounding land. Design features such as Wildlife corridors, minibeast hotels, green roofs, and green walls will be considered throughout the design in order to ensure the net gain is achieved. In addition to this, plant choices will be predominantly native but also include non-native plants that are climate change resilient, can extend seasonality and have significant benefits to biodiversity.

Local Air Quality

In order to mitigate the impacts on local air quality multiple design considerations will be made, considering contributing aspects such as planting and biodiversity, and transport. The landscape will include a verdant planting strategy aimed at improving air quality and supporting and improving on the rich ecological landscape. The development will also aim to deliver an air quality neutral development, through a combustion-free equipment and vehicles on-site.

Resilience & Adaptability

The design will seek to ensure ease of disassembly and functional adaptability principles such as durability of materials, exposed and reversible connections, layer independence are considered throughout the development design. These design considerations will not only demonstrate forward thinking of how the development may change use of the building's life cycle but will also maximise the ability to reclaim and reuse materials when required in line with the principles of a circular economy.

A Climate Change Risk Assessment and Adaptation Strategy will also be undertaken, outlining and identifying measures to strengthen the resilience of the building's fabric, structure and services throughout the life cycle. The Strategy will cover elements such as flooding, storms, heat waves and subsidence or ground movement. The factoring of these considerations within the early stages of the building design, will ensure future risks are mitigated as far as possible, as well as maximise asset resilience and value through consideration of the likely impacts of future climate change on the project.

Resource Efficiency

The following process has been followed in developing the Circular Economy statement for the development:

- Circular Economy principles have been reviewed by the project team as part of the process of developing the Circular Economy statement and the sustainability strategy.
- Additional workshops will be held during the detailed design stages to explore further opportunities to incorporate key Circular Economy principles into aspects of the detailed design, procurement and construction process.
- As the proposals move toward the construction stage, early engagement will be sought with contractors to assist in refining strategies for delivery.
- Robust data collection plans will be implemented through design and construction to facilitate ongoing monitoring against intended outcomes.
- Given the scale of the development it is expected that the strategies and approach will evolve over time.

The Circular Economy principles will be implemented to ensure efficient use of natural resources. Critical measures include:

- A strategy to reduce, reuse and recycle materials minimising construction waste generation to ≤3.4 tonnes/100m2 and achieving 95% diversion from landfill. Pre-demolition materials on site will be re-used where feasible.
- On site environmental data during the construction phase will be collated, reviewed and verified to promote transparency and accountability. Upon project completion, the Applicant will disclose the waste arisings from the development.
- Modern methods of construction including dry construction and Design for Manufacturing and Assembly (DfMA) will be tested to reduce the development's overall environmental footprint, improve health and safety performance, and optimise construction time.
- Cut and fill on the site will be optimised with consideration for reducing vehicle movements from the site for waste materials and remediation of contaminated ground.
- The site has been designed without a basement, reducing excavation of material, reduced material usage and disturbance.

5. Conclusion.

This report presents the Sustainability Strategy for the Proposed Development which has been informed by national and local policy requirements, the Applicant's vision and sustainable design and development guidance and frameworks including, but not limited to:

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- GLA Draft Energy Assessment Guidance (2020)
- Camden Local Plan (2017)
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- Dartmouth Park Neighbourhood Forum Neighbourhood Plan (2020)
- Draft Site Allocations Document (2019)

To capture the multi-faceted sustainability benefits and values that the proposed development can bring to the site, local community, surrounding businesses, and future building users, five defined factors – the people, the building, the social network, the natural environment, and the economic aspects – inform our proposed sustainability framework. These are summarised below:

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Social Capital	"Connecting people". By enabling community identity, SOCIAL VALUE is increased where a great place brings people together and creates
Economic Capital	By ensuring equity for all, ECONOMIC VALUE is increased where all users of a place feel they have a level of ownership of the asset and buy-in to the outcomes it is seeking to achieve.
Human Capital	"Happy and healthy" With a focus on people, HUMAN VALUE is increased where quality and longevity of life is improved, and happiness is increased.
Natural Capital	"Positive impact" By seeking to achieve a positive net gain NATURAL VALUE is increased where existing quality is protected, and new complementary resources are introduced.

Appendix A – Direct Response to LBC Policies.

Policy	Compliance
CC1: Climate Change Mitigation	
promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy.	The proposed development will target to reduce carbon dioxide emissions through the steps of the energy hierarchy.
require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;	An Energy Strategy will be submitted showing how, as a minimum the London Plan targets for carbon dioxide emissions have been met.
ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;	The proposed development offers a unique opportunity to provide a combination of different workspace, residential and commercial building typologies set within a suitably serviced, but pedestrian and cycle prioritised public realm. The new employment opportunities to be brought forward on the site will facilitate additional jobs for both future and surrounding residents which should minimise travel by car and help to support decentralised energy networks.
support and encourage sensitive energy efficiency improvements to existing buildings;	The development will consider the reuse of facades and structure where deemed most feasible in order to support and encourage sensitive energy efficiency improvements to existing buildings; The existing condition of the two buildings, any works will enhance their energy efficiency though the introduction of contemporary building fabric, materials and efficient systems.
require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and	The scheme will consider the retention and where probable, re-use of existing buildings, structures and materials such as re-claimed bricks in construction and crushed recycled aggregate. All materials considered for the site will be selected in line with appropriate responsible sourcing, EPD certification as well as ensure they are low emitting materials. Every effort will be made for valuable materials extracted as part of the demolition process to be re-used and/or recycled in accordance with the waste hierarchy giving priority to on-site uses where practical.
expect all developments to optimise resource efficiency.	Traditionally the greatest impact on an asset's whole life carbon has been associated with its operational phase. This trend is expected to shift due to the ongoing decarbonisation of the UK electricity grid and increasing adoption of all electric solutions for new developments. The embodied carbon associated with the building materials for the scheme will be quantified using the general guidance provided by the Royal Institution of

Policy	Compliance
	Chartered Surveyors (RICS). The RICS methodology provides benchmark estimates of embodied carbon associated with construction materials for various building types and also includes a factor for the construction site emissions.
promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;	The proposed development will aim to reduce carbon dioxide emissions as much as feasible possible through the steps of the energy hierarchy.
working with local organisations and developers to implement decentralised energy networks in the parts of Camden most likely to support them;	The proposed development would consider a site wide low carbon heat network.
protecting existing decentralised energy networks (e.g. at Gower Street, Bloomsbury, King's Cross, Gospel Oak and Somers Town) and safeguarding potential network routes; and	The development does not impact on Camden's existing decentralised energy networks.
requiring all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not possible establishing a new network.	The investigations have shown that the site is not in close proximity to any of the existing decentralised energy networks. The site will be future proofed to be able to connect to a network should one come forward in the future.
To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.	The development will seek to bridge the 'performance gap' between design and theory and measured reality. In order to execute this, the London Plan has introduced a fourth stage to the energy hierarchy; the 'be seen' stage, which requires monitoring and reporting of the actual operational energy performance of major developments for at least five years. Once planning approval has been granted the applicant will provide the estimates of each of the performance indicators listed in Table 2 of the 'Be Seen Energy Monitoring Guidance'. These will be reported to the GLA using the 'be seen' spreadsheet, within four weeks of planning approval, as required by the GLA. This information would also be provided to Camden.
CC2: Adapting to Climate Change	
the protection of existing green spaces and promoting new appropriate green infrastructure	The development will offer a new car-free connection from Kentish Town to Gospel Oak and the Heath. The connection will aim to connect the scheme to the surrounding neighbourhoods, and ensure access for all residents to surrounding areas, and parks such as Hampsted Heath.
not increasing, and wherever possible reducing, surface water run-off through	The New London Plan (March 2021) steers developers to limit surface water to greenfield runoff rates, flow

Policy	Compliance
increasing permeable surfaces and use of Sustainable Drainage Systems;	matching for the 1 in 1-year (25.69l/s) and 1 in 100-year (96.42l/s) storm events. Whilst adherence to the above rates would be in line with best practice and sustainability targets, it is acknowledged that this may lead to an impracticable quantum of attenuation on site and a reliance for larger unsustainable underground storage tanks. The site will aim to mitigate surface water run-off as a far as feasibly possible, in line with the London Plan guidelines.
incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate	Biodiversity will be achieved through a number of measures on site, not limited to green roofs, heathland, improved treelines + hedges.
measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.	The proposed development will aim to follow the cooling hierarchy and incorporate passive measures as much as possible into the scheme to mitigate the risks of overheating. Where the advice from the Acoustician is to close the windows to enable compliance with the sound levels, then mechanical ventilation will be required in order to achieve the required comfort levels. However, with the introduction of passive measures, such as internal blinds and glazing designed to reduce solar gains, this will help to reduce overheating at source; thereby limiting the amount of time a window may need to be opened to control heat build-up. In the noisiest parts of the site, a mechanical ventilation solution is currently being considered as an alternative to opening windows should occupants wish to utilise this. There are likely to be some areas, particularly those away from the main roads, where a natural ventilation strategy by simple opening of windows may be appropriate. This will be subject to further development post planning to determine areas where alternative means are introduced.
ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation	The development embeds key design principles of flexibility, adaptability, durability and versatility to future-proof the scheme and ensure that it can evolve organically in line with shifting societal trends to be able to continuously and effectively meet occupiers' requirements. Plot layout, sizes and heights will be developed in order to maximise flexibility during implementation and allow a variety of configurations to be brought forward.
encourage new build residential development to use the Home Quality Mark and Passivhaus design standards	The domestic elements will benefit from the site wide BREEAM features (e.g. Relating to Ecology and Transport) and passive measures will be optimised. Passivhaus principles are being incorporated to inform wall build ups, simplified form and reducing thermal bridges.

Policy	Compliance
encouraging conversions and extensions of 500 sqm of residential floorspace or above or five or more dwellings to achieve "excellent" in BREEAM domestic refurbishment	There is no domestic refurbishment planned for the scheme.
expecting non-domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM assessments and encouraging zero carbon in new development from 2019	The commercial areas of the scheme will be assessed against the BREEAM UK New Construction 2018 guidance, targeting to achieve BREEAM 'Excellent' with 60% of the un-weighted credits in the Energy and Water category, and 40% in Materials.
CC3: Water and flooding	
incorporate water efficiency measures;	The Development will be fitted with water efficient fixtures and fittings, and water meters will be provided to enable the monitoring of water consumption. Leak detection will also be considered for the buildings, capable of detecting any major leaks within each plot where this is technically viable as well as between the buildings and the utilities water supply.
avoid harm to the water environment and improve water quality;	The development will manage water pollution risk throughout the construction phase and utilise SuDS to store excess surface water and reduce the rate and volume of run-off to the local drainage system, limiting the flood risk to the site and surrounding areas. The following SuDS techniques are being considered: - Blue Roof - Green/ Brown Roof - Rainwater Harvesting - Filter Drains - Bio-retention - Tree pits - Permeable Paving
consider the impact of development in areas at risk of flooding (including drainage);	Current Environment Agency (EA) Flood Maps for Planning show that the site in its entirety is located within Flood Zone 1 (FZ1), defined as land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) – very low. As a result of the above the risk of flooding from fluvial/tidal sources is low.
incorporate food resilient measures in areas prone to flooding;	Current Environment Agency (EA) Flood Maps for Planning show that the site in its entirety is located within Flood Zone 1 (FZ1), defined as land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) – very low. As a result of the above the risk of flooding from fluvial/tidal sources is low.
utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible;	The New London Plan (March 2021) steers developers to limit surface water to greenfield runoff rates, flow matching for the 1 in 1-year (25.69l/s) and 1 in 100-year (96.42l/s) storm events. Whilst adherence to the above

Policy	Compliance
	rates would be in line with best practice and sustainability targets, it is acknowledged that this may lead to an impracticable quantum of attenuation on site and a reliance for larger unsustainable underground storage tanks. The site has three existing connections to the public sewer network and a review will be undertaken to determine the actual current discharge rate from the site. The results of this will facilitate a pragmatic discussion to take place with the LLFA/Thames Water and negotiation of a potential relaxation on greenfield restrictions is deemed appropriate.
not locate vulnerable development in food-prone areas.	Current Environment Agency (EA) Flood Maps for Planning show that the site in its entirety is located within Flood Zone 1 (FZ1), defined as land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%) – very low. As a result of the above the risk of flooding from fluvial/tidal sources is low.
Where an assessment of food risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.	The site is considered to be at a low risk of flooding following implementation of a suitable surface water management strategy. A SuDS appraisal exercise will be undertaken to assess the appropriateness of the full spectrum of different sustainable techniques as identified within CIRIA C753. Residual pluvial flood risk, including an assessment of overland flow routes in extreme rainfall events will be addressed as part of the FRA to ensure there are no adverse effects to offsite flood risk. Please refer to supporting FRA report for full details on the FRA strategy for the scheme.
CC4: Air Quality	
Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.	AQC will be completing a full, detailed air quality assessment and will ensure mitigation is provided to reduce emissions and protect against exposure to poor air quality as required. An assessment against the Air Quality Neutral benchmarks will also be undertaken.
Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to	AQC will assess the impacts of construction dust using best practice guidance from the GLA and will recommend mitigation in accordance with guidance. A CEMP/DMP will be recommended within the mitigation as standard.

Policy	Compliance
be secured in a Construction Management Plan.	
CC5: Waste	
aim to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031;	The waste strategy will be developed and submitted with the Reserved Matters Application.
deal with North London's waste by working with our partner boroughs in North London to produce a Waste Plan, which will ensure that sufficient land is allocated to manage the amount of waste apportioned to the area in the London Plan;	Not applicable to this development as no waste processing is proposed to be located on the development.
safeguard Camden's existing waste site at Regis Road unless a suitable compensatory waste site is provided that replaces the maximum throughput achievable at the existing site;	Not applicable to this development as no waste processing is proposed to be located on the development.
make sure that developments include facilities for the storage and collection of waste and recycling.	The waste strategy will follow the waste hierarchy by reducing waste where feasible and maximising the volume of unavoidable waste that is recycled and composted. Based on this approach, key targets for the Proposed Development are as follows: – Contribute to a raised awareness to prevent and where necessary reduce waste and encouraging waste separation and recycling at source; – Maximise recycling waste for unavoidable waste; and – incorporate well designed and efficient facilities that meet waste disposal and recycling needs. For the operational waste management, the anticipated waste volumes will be calculated based on CIBSE Guide G (2014), Waste Management in Buildings Code of Practice BS5906:2005 and Waste and Resources Action Programme (WRAP) benchmark data. The operational waste management strategy will be developed during the detailed design stages and submitted in support of the Reserved Matters applications for the relevant areas.

Appendix B – Policy Context Review.

Current Policy Framework.

The policies considered when preparing this strategy are contained in the London Plan (GLA, 2021) and the local planning policy of the London Borough of Camden.

The proposed development constitutes a 'major development' (>10 dwellings and/or >1,000m^2 of non-residential floor space) and is therefore subject to the policies of the GLA, contained within the London Plan.

National Policy.

Approved Document Part L

Part L of the Building Regulations is the mechanism by which government is driving reductions in the regulated CO_2 emissions from new buildings.

Current Requirements: Part L 2013

Part L has five key criteria which must be satisfied as follows:

- Criterion 1 - Achieving the Target Emission Rate (TER)
- Criterion 2 - Limits on design flexibility
- Criterion 3 - Limiting the effects of solar gains in summer
- Criterion 4 - Building performance consistent with the Building Emission Rate (BER)
- Criterion 5 - Provision for energy efficient operation of the building

Criterion one requires that the building as designed is not predicted to generate CO2 emissions in excess of that set by the Target Emission Rate (TER) calculated in accordance with the approved Standard Assessment Procedure (SAP) 2012. Part L (2013) requires the following reductions:

- A 6% aggregate reduction in CO2 emissions beyond the requirements of Part L 2010 for dwellings; and
- A 9% aggregate reduction in CO2 emissions beyond the requirements of Part L 2010 for non-domestic buildings.

Criterion two places upper limits on the efficiency of controlled fittings and services for example, an upper limit to an external wall U-value of 0.35W/m^2.K (non-domestic buildings).

A Fabric Energy Efficiency Standard (FEES) has been introduced for new buildings although no definitive targets have been set in this regard. Part L 2013 requires the following Fabric Energy Efficiency performance targets to be met:

Target Fabric Energy Efficiency (TFEE). The TFEE is calculated for the building, based upon an elemental recipe of efficiency parameters, applied to the geometry of the building in question. This would generate a notional value which would then be relaxed by 15% to generate the TFEE

Criterion three requires that zones in non-residential buildings are not subject to excessive solar gains. This is demonstrated using the Simplified Building Energy Model (SBEM) or Dynamic Simulation Method (DSM) for non-residential buildings.

Local Policy.

London Plan (March 2021).

Policy G5 – Urban greening

Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Boroughs should develop an Urban Greening Factor (UGF) to identify the appropriate amount of urban greening required in new developments. The UGF should be based on the factors set out in Table 8.2 but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for

developments that are predominately residential, and a target score of 0.3 for predominately commercial development (excluding B2 and B8 uses).

Existing green cover retained on site should count towards developments meeting the interim target scores set out in (B) based on the factors set out in Table 8.2

Policy G6 – Biodiversity and access to nature

Sites of Importance for Nature Conservation (SINCs) should be protected.

Boroughs, in developing Development Plans, should:

- use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
- identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
- support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
- seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context
- ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:

- avoid damaging the significant ecological features of the site
- minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
- deliver off-site compensation of better biodiversity value.

Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.

Proposals which reduce deficiencies in access to nature should be considered positively.

Policy SI 1 – Air quality

Development Plans, through relevant strategic, site-specific and area-based policies, should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor's or boroughs' activities to improve air quality.

To tackle poor air quality, protect health and meet legal obligations the following criteria should be addressed:

- Development proposals should not:
  - lead to further deterioration of existing poor air quality
  - create any new areas that exceed air quality limits, or delay the date at which compliance will be achieved in areas that are currently in exceedance of legal limits
  - create unacceptable risk of high levels of exposure to poor air quality.
- In order to meet the requirements in Part 1, as a minimum:
  - development proposals must be at least Air Quality Neutral
  - development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality in preference to post-design or retrofitted mitigation measures
  - major development proposals must be submitted with an Air Quality Assessment. Air quality assessments should show how the development will meet the requirements of B1

  - development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people particularly vulnerable to poor air quality, such as children or older people should demonstrate that design measures have been used to minimise exposure.

Masterplans and development briefs for large-scale development proposals subject to an Environmental Impact Assessment should consider how local air quality can be improved across the area of the proposal as part of an air quality positive approach. To achieve this a statement should be submitted demonstrating:

- how proposals have considered ways to maximise benefits to local air quality, and
- what measures or design features will be put in place to reduce exposure to pollution, and how they will achieve this.

In order to reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.

Policy SI 2 – Minimising greenhouse gas emissions

- Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
  - Be Lean: use less energy and manage demand during operation
  - Be Clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
  - Be Green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  - Be Seen: monitor, verify and report on energy performance.
- Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.
- A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required for major development. Residential development should achieve 10 per cent, and non-residential development should achieve 15 per cent through energy efficiency measures. Where it is clearly demonstrated that the zero-carbon target cannot be fully achieved on-site, any shortfall should be provided, in agreement with the borough, either:
  - through a cash in lieu contribution to the borough's carbon offset fund, or
  - off-site provided that an alternative proposal is identified, and delivery is certain.
- Boroughs must establish and administer a carbon offset fund. Offset fund payments must be ring-fenced to implement projects that deliver carbon reductions. The operation of offset funds should be monitored and reported on annually.
- Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Building Regulations, i.e. unregulated emissions.
- Development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life Cycle Carbon Assessment and demonstrate actions taken to reduce life cycle carbon emissions.

Policy SI 3 – Energy infrastructure

- Boroughs and developers should engage at an early stage with relevant energy companies and bodies to establish the future energy and infrastructure requirements arising from large-scale

development proposals such as Opportunity Areas, Town Centres, other growth areas or clusters of significant new development.

- Energy masterplans should be developed for large-scale development locations (such as those outlined in Part A and other opportunities) which establish the most effective energy supply options. Energy masterplans should identify:
  - major heat loads (including anchor heat loads, with particular reference to sites such as universities, hospitals and social housing)
  - heat loads from existing buildings that can be connected to future phases of a heat network
  - major heat supply plant including opportunities to utilise heat from energy from waste plants
  - secondary heat sources, including both environmental and waste heat
  - opportunities for low and ambient temperature heat networks
  - possible land for energy centres and/or energy storage
  - possible heating and cooling network routes
  - opportunities for futureproofing utility infrastructure networks to minimise the impact from road works
  - infrastructure and land requirements for electricity and gas supplies
  - implementation options for delivering feasible projects, considering issues of procurement, funding and risk, and the role of the public sector
  - opportunities to maximise renewable electricity generation and incorporate demand-side response measures.
- Development Plans should:
  - identify the need for, and suitable sites for, any necessary energy infrastructure requirements including energy centres, energy storage and upgrades to existing infrastructure
  - identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.
- Major development proposals within Heat Network Priority Areas should have a communal low-temperature heating system:
  - the heat source for the communal heating system should be selected in accordance with the following heating hierarchy:
    - connect to local existing or planned heat networks
    - use zero-emission or local secondary heat sources (in conjunction with heat pump, if required)
    - use low-emission combined heat and power (CHP) (only where there is a case for CHP to enable the delivery of an area-wide heat network, meet the development's electricity demand and provide demand response to the local electricity network)
    - use ultra-low NOx gas boilers
  - CHP and ultra-low NOx gas boiler communal or district heating systems should be designed to ensure that they meet the requirements in Part B of Policy SI 1 Improving air quality
  - where a heat network is planned but not yet in existence the development should be designed to allow for the cost-effective connection at a later date.
- Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.

Policy SI 4 – Managing Heat Risk

- Development proposals should minimise adverse impacts on the urban heat island through design, layout, orientation, materials and the incorporation of green infrastructure.
- Major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure
- minimise internal heat generation through energy efficient design
- manage the heat within the building through exposed internal thermal mass and high ceilings
- provide passive ventilation
- provide mechanical ventilation
- provide active cooling systems.

Policy SI 5 – Water infrastructure

In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner.

Development Plans should promote improvements to water supply infrastructure to contribute to security of supply. This should be done in a timely, efficient and sustainable manner taking energy consumption into account.

Development proposals should:

- through the use of Planning Conditions minimise the use of mains water in line with the Optional Requirement of the Building Regulations (residential development), achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption)
- achieve at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent (commercial development)
- incorporate measures such as smart metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise futureproofing.

In terms of water quality, Development Plans should:

- promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and should take account of Catchment Plans
- support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Such infrastructure should be constructed in a timely and sustainable manner taking account of new, smart technologies, intensification opportunities on existing sites, and energy implications. Boroughs should work with Thames Water in relation to local wastewater infrastructure requirements.

Development proposals should:

- seek to improve the water environment and ensure that adequate wastewater infrastructure capacity is provided
- take action to minimise the potential for misconnections between foul and surface water networks.

Development Plans and proposals for strategically or locally defined growth locations with particular flood risk constraints or where there is insufficient water infrastructure capacity should be informed by Integrated Water Management Strategies at an early stage.

Policy SI 6 – Digital connectivity infrastructure

To ensure London's global competitiveness now and in the future, development proposals should:

- ensure that sufficient ducting space for full fibre connectivity infrastructure is provided to all end users within new developments, unless an affordable alternative 1GB/s-capable connection is made available to all end users
- meet expected demand for mobile connectivity generated by the development
- take appropriate measures to avoid reducing mobile connectivity in surrounding areas; where that is not possible, any potential reduction would require mitigation
- support the effective use of rooftops and the public realm (such as street furniture and bins) to accommodate well-designed and suitably located mobile digital infrastructure.

Development Plans should support the delivery of full-fibre or equivalent digital infrastructure, with particular focus on areas with gaps in connectivity and barriers to digital access.

Policy SI 7 – Reducing waste and supporting the circular economy

Resource conservation, waste reduction, increases in material re-use and recycling, and reductions in waste going for disposal will be achieved by the Mayor, waste planning authorities and industry working in collaboration to:

- promote a more circular economy that improves resource efficiency and innovation to keep products and materials at their highest use for as long as possible
- encourage waste minimisation and waste prevention through the reuse of materials and using fewer resources in the production and distribution of products
- ensure that there is zero biodegradable or recyclable waste to landfill by 2026
- meet or exceed the municipal waste recycling target of 65 per cent by 2030
- meet or exceed the targets for each of the following waste and material streams:
    - construction and demolition – 95 per cent reuse/recycling/recovery
    - excavation – 95 per cent beneficial use
- design developments with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food.

Referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:

- how all materials arising from demolition and remediation works will be re-used and/or recycled
- how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
- opportunities for managing as much waste as possible on site
- adequate and easily accessible storage space and collection systems to support recycling and re-use
- how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
- how performance will be monitored and reported.

Development Plans that apply circular economy principles and set local lower thresholds for the application of Circular Economy Statements for development proposals are supported.

Policy SI 8 – Waste capacity and net waste self sufficiency

In order to manage London's waste sustainably:

- the equivalent of 100 per cent of London's waste should be managed within London (i.e. net self-sufficiency) by 2026
- existing waste management sites should be safeguarded (see Policy SI 9 Safeguarded waste sites)
- the waste management capacity of existing sites should be optimised
- new waste management sites should be provided where required
- environmental, social and economic benefits from waste and secondary materials management should be created.

Development Plans should:

- plan for identified waste needs
- identify how waste will be reduced, in line with the principles of the Circular Economy and how remaining quantum's of waste will be managed
- allocate sufficient sites, identify suitable areas, and identify waste management facilities to provide the capacity to manage the apportioned tonnages of waste, as set out in Table 9.2 - boroughs are encouraged to collaborate by pooling their apportionment requirements
- identify the following as suitable locations to manage borough waste apportionments:
    - existing waste and secondary material sites/land, particularly waste transfer facilities, with a view to maximising their capacity
    - Strategic Industrial Locations and Locally Significant Industrial Sites
    - safeguarded wharves with an existing or future potential for waste and secondary material management.

Mayoral Development Corporations must cooperate with host boroughs to meet identified waste needs.

Development proposals for materials and waste management sites are encouraged where they:

- deliver a range of complementary waste management and secondary material processing facilities on a single site
- support prolonged product life and secondary repair, refurbishment and remanufacture of materials and assets
- contribute towards renewable energy generation, especially renewable gas technologies from organic/biomass waste, and/or
- are linked to low emission combined heat and power and/or combined cooling heat and power (CHP is only acceptable where it will enable the delivery or extension of an area-wide heat network consistent with Policy SI 3 Energy Infrastructure Part D1c)

Developments proposals for new waste sites or to increase the capacity of existing sites should be evaluated against the following criteria:

- the nature of the activity, its scale and location
- effective implementation of the waste hierarchy and its contribution to London's circular economy
- achieving a positive carbon outcome (i.e. re-using and recycling high carbon content materials) resulting in significant greenhouse gas savings – all facilities generating energy from waste will need to meet, or demonstrate that steps are in place to meet, a minimum performance of 400g of CO2 equivalent per kilowatt hour of electricity produced
- the impact on amenity in surrounding areas (including but not limited to noise, odours, air quality and visual impact) - where a site is likely to produce significant air quality, dust or noise impacts, it should be fully enclosed
- the transport and environmental impacts of all vehicle movements related to the proposal - the use of renewable fuels from waste sources and the use of rail and waterway networks to transport waste should be supported

When planning for new waste sites or to increase the capacity at existing sites the following should be considered:

- job creation and social value benefits, including skills, training and apprenticeship opportunities
- local need
- accessibility of services for local communities and businesses.

Policy SI 12 – Flood risk management

Current and expected flood risk from all sources (as defined in paragraph 9.12.2) across London should be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure providers.

Development Plans should use the Mayor's Regional Flood Risk Appraisal and their Strategic Flood Risk Assessment as well as Local Flood Risk Management Strategies, where necessary, to identify areas where particular and cumulative flood risk issues exist and develop actions and policy approaches aimed at reducing these risks. Boroughs should co-operate and jointly address cross-boundary flood risk issues including with authorities outside London.

Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.

Developments Plans and development proposals should contribute to the delivery of the measures set out in Thames Estuary 2100 Plan. The Mayor will work with the Environment Agency and relevant local planning authorities, including authorities outside London, to safeguard an appropriate location for a new Thames Barrier.

Development proposals for utility services should be designed to remain operational under flood conditions and buildings should be designed for quick recovery following a flood.

Development proposals adjacent to flood defences will be required to protect the integrity of flood defences and allow access for future maintenance and upgrading. Unless exceptional circumstances are demonstrated for not doing so, development proposals should be set back from flood defences to allow for any foreseeable future maintenance and upgrades in a sustainable and cost-effective way.

Natural flood management methods should be employed in development proposals due to their multiple benefits including increasing flood storage and creating recreational areas and habitat.

Policy SI 13 – Sustainable drainage

Lead Local Flood Authorities should identify – through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface water management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.

Development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference for green over grey features, in line with the following drainage hierarchy:

- rainwater use as a resource (for example rainwater harvesting, blue roofs for irrigation)
- rainwater infiltration to ground at or close to source
- rainwater attenuation in green infrastructure features for gradual release (for example green roofs, rain gardens)
- rainwater discharge direct to a watercourse (unless not appropriate)
- controlled rainwater discharge to a surface water sewer or drain
- controlled rainwater discharge to a combined sewer.

Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be unavoidable, including on small surfaces such as front gardens and driveways.

Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation.

Policy T4 – Assessing and mitigating transport impacts

Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.

When required in accordance with national or local guidance, transport assessments/statements should be submitted with development proposals to ensure that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and in the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London guidance.

Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.

Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.

The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.

Development proposals should not increase road danger.

Policy T5 – Cycling

Development Plans and development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. This will be achieved through:

- supporting the delivery of a London-wide network of cycle routes, with new routes and improved infrastructure
- securing the provision of appropriate levels of cycle parking which should be fit for purpose, secure and well-located. Developments should provide cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.2, ensuring that a minimum of two short-stay and two long-stay cycle parking spaces are provided where the application of the minimum standards would result in a lower provision.
    - B1 offices – Long stay
        - areas with higher cycle parking standards: 1 space per 75m^2
        - rest of London: 1 space per 150 m^2
    - B1 offices – short stay
        - First 5,000m^2: 1 space per 500m^2
        - Thereafter: 1 space per 5,000 m^2
    - A3/A4 Retail – long stay
        - 1 space per 175m^2
    - A3/A4 Retail – short stay
        - areas with higher cycle parking standards: 1 space per 20m^2
        - rest of London: 1 space per 40 m^2

Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.

Development Plans requiring more generous provision of cycle parking based on local evidence will be supported.

Where it is not possible to provide suitable short-stay cycle parking off the public highway, the borough should work with stakeholders to identify an appropriate on-street location for the required provision. This may mean the reallocation of space from other uses such as on-streetcar parking. Alternatively, in town centres, adding the required provision to general town centre cycle parking is also acceptable. In such cases, a commuted sum should be paid to the local authority to secure provision.

Where it is not possible to provide adequate cycle parking within residential developments, boroughs must work with developers to propose alternative solutions which meet the objectives of the standards. These may include options such as providing spaces in secure, conveniently located, on-street parking facilities such as bicycle hangers.

Where the use class of a development is not fixed at the point of application, the highest potential applicable cycle parking standard should be applied.

Policy T7 – Deliveries, servicing and construction

Development plans and development proposals should facilitate sustainable freight movement by rail, waterways and road.

Development Plans, Opportunity Area Planning Frameworks, Area Action Plans and other area-based plans should include freight strategies. These should seek to:

- reduce freight trips to, from and within these areas
- coordinate the provision of infrastructure and facilities to manage freight at an area-wide level

- reduce road danger, noise and emissions from freight, such as through the use of safer vehicles, sustainable last-mile schemes and the provision of rapid electric vehicle charging points for freight vehicles.

To support carbon-free travel from 2050, the provision of hydrogen refuelling stations and rapid electric vehicle charging points at logistics and industrial locations is supported.

Development Plans should safeguard railheads unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling. The factors to consider in assessing the viability of a railhead include:

- Planning history, environmental impact and its relationship to surrounding land use context – recognising that the Agent of Change principle will apply
- Location, proximity to the strategic road network and existing/potential markets
- The existing and potential contribution the railhead can make towards catering for freight movements by non-road modes
- The location and availability of capacity at alternate railheads, in light of current and projected capacity and market demands.

Consolidation and distribution sites at all scales should be designed to enable 24-hour operation to encourage and support out-of-peak deliveries.

Development proposals for new consolidation and distribution facilities should be supported provided that they do not cause unacceptable impacts on London's strategic road networks and:

- reduce road danger, noise and emissions from freight trips
- enable sustainable last-mile movements, including by cycle and electric vehicle
- deliver mode shift from road to water or rail where possible (without adversely impacting existing or planned passenger services).

Development proposals should facilitate safe, clean, and efficient deliveries and servicing. Provision of adequate space for servicing, storage and deliveries should be made off-street, with on-street loading bays only used where this is not possible. Construction Logistics Plans and Delivery and Servicing Plans will be required and should be developed in accordance with Transport for London guidance and in a way which reflects the scale and complexities of developments.

Developments should be designed and managed so that deliveries can be received outside of peak hours and in the evening or night-time. Appropriate facilities are required to minimise additional freight trips arising from missed deliveries and thus facilitate efficient online retailing.

At large developments, facilities to enable micro-consolidation should be provided, with management arrangements set out in Delivery and Servicing Plans.

Development proposals must consider the use of rail/water for the transportation of material and adopt construction site design standards that enable the use of safer, lower trucks with increased levels of direct vision on waste and landfill sites, tip sites, transfer stations and construction sites.

During the construction phase of development, inclusive and safe access for people walking or cycling should be prioritised and maintained at all times.

Regional Policy.

Camden Local Plan

Policy CC1 Climate Change Mitigation
The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards that are financially viable during construction and occupation.

We will:

- Promote zero carbon development and require all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy;
- Require all major development to demonstrate how London Plan targets for carbon dioxide emissions have been met;
- Ensure that the location of development and mix of land uses minimise the need to travel by car and help to support decentralised energy networks;
- Support and encourage sensitive energy efficiency improvements to existing buildings;
- Require all proposals that involve substantial demolition to demonstrate that it is not possible to retain and improve the existing building; and
- Expect all developments to optimise resource efficiency.

For decentralised energy networks, we will promote decentralised energy by:

- Working with local organisations and developers to implement decentralised energy networks in the parts of Camden most likely to support them;
- Protecting existing decentralised energy networks (e.g. at Gower Street, Bloomsbury, King's Cross, Gospel Oak and Somers Town) and safeguarding potential network routes; and requiring all major developments to assess the feasibility of connecting to an existing decentralised energy network, or where this is not
  possible establishing a new network.

To ensure that the Council can monitor the effectiveness of renewable and low carbon technologies, major developments will be required to install appropriate monitoring equipment.

Policy CC2 Adapting to Climate Change

The Council will require development to be resilient to climate change.

All development should adopt appropriate climate change adaptation measures such as:

- The protection of existing green spaces and promoting new appropriate green infrastructure;
- Not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems
- Incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate; and
- Measures to reduce the impact of urban and dwelling overheating, including application of the cooling hierarchy.

Any development involving 5 or more residential units or 500 sqm or more of any additional floorspace is required to demonstrate the above in a Sustainability Statement.

Sustainable design and construction measures

The Council will promote and measure sustainable design and construction by:

- Ensuring development schemes demonstrate how adaptation measures and sustainable development principles have been incorporated into the design and proposed implementation;
- Encourage new build residential development to use the Home Quality Mark and Passivhaus design standards;
- Encouraging conversions and extensions of 500 sqm of residential floorspace or above or five or more dwellings to achieve "excellent" in BREEAM domestic refurbishment; and
- Expecting non-domestic developments of 500 sqm of floorspace or above to achieve "excellent" in BREEAM assessments and encouraging zero carbon in new development from 2019.

Policy CC3 Water and flooding

The Council will seek to ensure that development does not increase food risk and reduces the risk of flooding where possible.

We will require development to:

- Incorporate water efficiency measures;
- Avoid harm to the water environment and improve water quality;

- Consider the impact of development in areas at risk of flooding (including drainage);
- Incorporate food resilient measures in areas prone to flooding;
- Utilise Sustainable Drainage Systems (SuDS) in line with the drainage hierarchy to achieve a greenfield run-off rate where feasible; and
- Not locate vulnerable development in food-prone areas.

Where an assessment of food risk is required, developments should consider surface water flooding in detail and groundwater flooding where applicable.

The Council will protect the borough's existing drinking water and foul water infrastructure, including the reservoirs at Barrow Hill, Hampstead Heath, Highgate and Kidderpore.

Policy CC4 Air quality

The Council will ensure that the impact of development on air quality is mitigated and ensure that exposure to poor air quality is reduced in the borough.

The Council will take into account the impact of air quality when assessing development proposals, through the consideration of both the exposure of occupants to air pollution and the effect of the development on air quality. Consideration must be taken to the actions identified in the Council's Air Quality Action Plan.

Air Quality Assessments (AQAs) are required where development is likely to expose residents to high levels of air pollution. Where the AQA shows that a development would cause harm to air quality, the Council will not grant planning permission unless measures are adopted to mitigate the impact. Similarly, developments that introduce sensitive receptors (i.e. housing, schools) in locations of poor air quality will not be acceptable unless designed to mitigate the impact.

Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts in an AQA and include appropriate mitigation measures to be secured in a Construction Management Plan.

Policy CC5 Waste

The Council will seek to make Camden a low waste borough.

We will:

- Aim to reduce the amount of waste produced in the borough and increase recycling and the reuse of materials to meet the London Plan targets of 50% of household waste recycled/composted by 2020 and aspiring to achieve 60% by 2031;
- Deal with North London's waste by working with our partner boroughs in North London to produce a Waste Plan, which will ensure that sufficient land is allocated to manage the amount of waste apportioned to the area in the London Plan
- Safeguard Camden's existing waste site at Regis Road unless a suitable compensatory waste site is provided that replaces the maximum throughput achievable at the existing site; and
- Make sure that developments include facilities for the storage and collection of waste and recycling.

Policy A3 Biodiversity

The Council will protect and enhance sites of nature conservation and biodiversity. We will

- Designate and protect nature conservation sites and safeguard protected and priority habitats and species;
- Grant permission for development unless it would directly or indirectly result in the loss or harm to a designated nature conservation site or adversely affect the status or population of priority habitats and species;
- Seek the protection of other features with nature conservation value, including gardens, wherever possible;

- Assess developments against their ability to realise benefits for biodiversity through the layout, design and materials used in the built structure and landscaping elements of a proposed development, proportionate to the scale of development proposed;
- Secure improvements to green corridors, particularly where a development scheme is adjacent to an existing corridor;
- Seek to improve opportunities to experience nature, in particular where such opportunities are lacking;
- Require the demolition and construction phase of development, including the movement of works vehicles, to be planned to avoid disturbance to habitats and species and ecologically sensitive areas, and the spread of invasive species;
- Secure management plans, where appropriate, to ensure that nature conservation objectives are met; and Work with The Royal Parks, The City of London Corporation, the London Wildlife Trust, friends of park groups and local nature conservation groups to protect and improve open spaces and nature conservation in Camden.

Trees and vegetation

The Council will protect, and seek to secure additional, trees and vegetation. We will:

- Resist the loss of trees and vegetation of significant amenity, historic, cultural or ecological value including proposals which may threaten the continued wellbeing of such trees and vegetation;
- Require trees and vegetation which are to be retained to be satisfactorily protected during the demolition and construction phase of development in line with BS5837:2012 'Trees in relation to Design, Demolition and Construction' and positively integrated as part of the site layout;
- Expect replacement trees or vegetation to be provided where the loss of significant trees or vegetation or harm to the wellbeing of these trees and vegetation has been justified in the context of the proposed development;
- Expect developments to incorporate additional trees and vegetation wherever possible.

Policy T1 Prioritising walking, cycling and public transport

The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough.

Walking

In order to promote walking in the borough and improve the pedestrian environment, we will seek to ensure that developments:

- Improve the pedestrian environment by supporting high quality public realm improvement works;
- Make improvements to the pedestrian environment including the provision of high-quality safe road crossings where needed, seating, signage and landscaping;
- Are easy and safe to walk through ('permeable');
- Are adequately lit;
- Provide high quality footpaths and pavements that are wide enough for the number of people expected to use them. Features should also be included to assist vulnerable road users where appropriate; and
- Contribute towards bridges and water crossings where appropriate.

Cycling

In order to promote cycling in the borough and ensure a safe and accessible environment for cyclists, the Council will seek to ensure that development:

- Provides for and makes contributions towards connected, high quality, convenient and safe cycle routes, in line or exceeding London Cycle Design Standards, including the implementation of the Central London Grid, Quietway's Network, Cycle Superhighways and;
- Provides for accessible, secure cycle parking facilities exceeding minimum standards outlined within the London Plan (Table 6.3) and design requirements outlined within our supplementary planning document Camden Planning Guidance on transport. Higher levels of provision may also be required

in areas well served by cycle route infrastructure, taking into account the size and location of the development;
- Makes provision for high quality facilities that promote cycle usage including changing rooms, showers, dryers and lockers;
- Is easy and safe to cycle through ('permeable'); and
- Contributes towards bridges and water crossings suitable for cycle use where appropriate.

Public Transport

In order to safeguard and promote the provision of public transport in the borough we will seek to ensure that development contributes towards improvements to bus network infrastructure including access to bus stops, shelters, passenger seating, waiting areas, signage and timetable information. Contributions will be sought where the demand for bus services generated by the development is likely to exceed existing capacity. Contributions may also be sought towards the improvement of other forms of public transport in major developments where appropriate.

Where appropriate, development will also be required to provide for interchanging between different modes of transport including facilities to make interchange easy and convenient for all users and maintain passenger comfort.

Policy T2 Parking and car-free development

The Council will limit the availability of parking and require all new developments in the borough to be car-free.

We will:

- Not issue on-street or on-site parking permits in connection with new developments and use legal agreements to ensure that future occupants are aware that they are not entitled to on-street parking permits;
- Limit on-site parking to:
  - Spaces designated for disabled people where necessary, and/or
  - Essential operational or servicing needs;
- Support the redevelopment of existing car parks for alternative uses; and
- Resist the development of boundary treatments and gardens to provide vehicle crossovers and on-site parking.

Policy T3 Transport infrastructure

The Council will seek improvements to transport infrastructure in the borough.

We will:

- Not grant planning permission for proposals which are contrary to the safeguarding of strategic infrastructure improvement projects; and
- Protect existing and proposed transport infrastructure, particularly routes and facilities for walking, cycling and public transport, from removal or severance;

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