Euston House
Sustainability Statement

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PROJECT:

EUSTON HOUSE
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CLIENT:

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information

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1. Executive Summary

Hilson Moran have been appointed by Arax Properties to provide sustainability consultancy advice and to undertake a Sustainability Statement for the Euston House redevelopment. The proposed development is located adjacent to Euston Rail station, on Eversholt Street in the London Borough of Camden.

The building was constructed between 1933-1934 as the headquarters for the 'London, Midland and Scottish Railway', later the 'British Railways Board. It is a 9-storey commercial office building with a set-back floor of covered plant, acting as a tenth storey. The building facades are of high quality detailed with red London stock brick and Portland stone.

The proposed development will include external alterations including the construction of an atrium roof, external roof terrace at level 9, the installation of balconies at levels 1 – 8, the removal of the existing atrium roof at level 1, additional Class E floorspace at levels 7 and 8, and a new cyclist entrance at Lancing Street with associated plant at roof level.

The scope of works means that the development does not fall under the definition of a major application. Therefore, a full Sustainability Statement and Energy Strategy is not required, however, the team wish to demonstrate how sustainability is being considered as part of this refurbishment.

The report includes a sustainability and energy policy review and a description of the sustainability appraisal frameworks applied to the development.

The development is also aiming for the design to meet the requirements of the London Borough of Camden's planning policy requirements relating to sustainable development.

The sustainability of the refurbished elements of the building will be improved by the improvements to biodiversity on the new building terraces, and improvements to access to the building for cyclists.

2. Introduction

2.1. Background

Hilson Moran have been appointed by Arax Properties to provide sustainability consultancy advice and to undertake a Sustainability Statement for the planning application at Euston House, London.

Euston House is located adjacent to Euston Rail station, on Eversholt Street in the London Borough of Camden.

The building was constructed between 1933-1934 as the headquarters for the 'London, Midland and Scottish Railway', later the 'British Railways Board. It is a 9-storey commercial office building with a set-back floor of covered plant, acting as a tenth storey. The building facades are of high quality detailed with red London stock brick and Portland stone.

The Site does not fall under any statutory heritage designations; however, it has been identified as a locally listed building by the London Borough of Camden and falls within the wider setting of the London View Management Framework (LVMF) Protected Vista from Assessment Point 6A.1 (Blackheath Point to St Paul's Cathedral).

Currently there are a number of shortcomings in the existing building, including;

- A lack of outside space
- Poor energy performance
- Poor use of the lightwell on the ground floor
- Constrained arrival experience

The proposed development will retain the existing building. The alterations and upgrades comprise of a series of sympathetic modifications which would address existing issues, including the poor quality and constrained arrival experience, lack of external amenity space and poor energy performance.

The proposed development would address these issues in an environmentally considerate way, with a range of interventions being delivered with end user experience in mind. The proposals include the provision of external amenity balconies, a roof terrace, improved end of journey experience. Any new plant proposed with the reconfiguration would be energy efficient.

The objective of these improvements is to ensure Euston House is brought in line with modern day requirements, with the various interventions all seeking to ensure that the building provides a range of amenities that entice workers back to the office as the London employment market rebounds after the COVID-19 pandemic.

It is proposed to;

- Provide balconies at levels 1-8
- Provide a new communal roof terrace on level 9
- Remove the existing atrium roof at level 1
- Provide a new entrance for cyclists on Lancing Street
- Office space added on L07 + L08
- Provide a roof over the atrium above plant level

This report relates to the Euston House development and is meant to be read as a standalone document. The document considers sustainability in the context of the following regional and local planning guidance.

- London Borough of Camden's Local Plan 2017

A summary of policies and how they have been addressed is detailed in Section 3.

2.2. Purpose

This Sustainability Statement will provide a framework for the developer to operate consistently within sustainability guidelines set out by the London Borough of Camden.

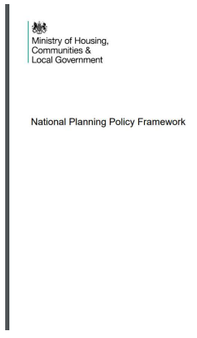
2.3. Relation to other documents

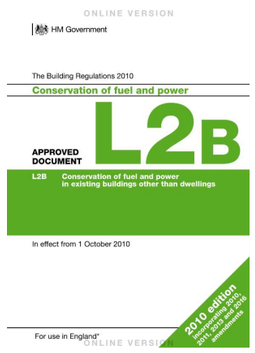
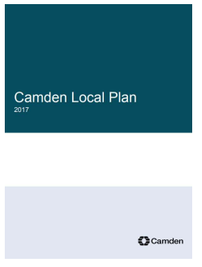
Other supporting documents which relate to this planning application include:

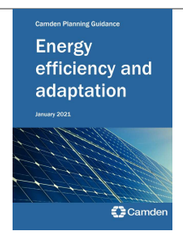
- Planning Statement (produced by Iceni);
- Design & Access Statement (produced by Apt);

3. Policy and good practice review

The following key energy, CO_2 emissions reduction and sustainability policies and documents have been reviewed in detail within the context of the scheme, in order to identify and target compliance with relevant requirements and to inform the viable sustainability design features and opportunities across all measures of the development:

Policy/standards	Description	Key policy & target summary	Document
National Planning Policy Framework (CLG, 2021):	Sets out the Government's Planning Policies for England and how these are expected to be applied, informing Local Councils and communities with regards to local plans and requirements. The document provides a revised and condensed approach to national planning and sustainability that includes economic, social and environmental roles.	This framework sets out the Government's planning policies for England and how these are expected to be applied. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. Responding to climate change, conserving and enhancing the natural environment form important sections of this document. The main relevant policies are: **Para - 11** Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that: a) all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects; b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole. **Para 20** Encourages strategic polices that consider the natural built and historic environment including landscapes green infrastructure and planning measures to address climate change mitigation and adaptation, this includes taking full account of flood risk and coastal change, provision of minerals and energy. **Para 120** Planning policy should recognise that undeveloped land maybe a function of flood risk mitigation, recreation, and carbon storage or food production. Encourage the use of brownfield land where appropriate. Chapter 14 discusses how the planning policy should meet the challenge of climate change, flooding and coastal change. **Para – 152** The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways	

Policy/standards	Description	Key policy & target summary	Document
		that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure **Para - 153** In determining planning applications, local planning authorities should expect new development to: • comply with any development plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable; and • Take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.	
Building Regulations Approved Document Part L2B: 2013 'Conservation of fuel and power in existing buildings other than dwellings'; (DCLG, 2013 incorporating 2016 amendments)	Guidance provided includes insulation regulations, boiler productivity, lighting, and storage techniques for hot water. Further information covered includes fixed standards for Carbon Index ratings, solar emissions, heating and ventilation systems, space heating controls and air conditioning systems, amongst other fuel and power systems. Changes reflect alterations to the regulations, principally the withdrawal of Regulations 29 to 33 of the Building Regulations 2010, and their replacement by Regulation 7A of the Energy Performance of Buildings (England and Wales) Regulations 2012 and changes in wording of regulations 24, 25, 26, 26A, 27 and 27A of the Building Regulations 2010. There are no technical changes.	**Regulation 23** 1. Where the renovation of an individual thermal element a) constitutes a major renovation; or b) amounts to the renovation of more than 50% of the element's surface area; The renovation must be carried out so as to ensure that the whole of the element complies with paragraph L1(a)(i) of Schedule 1, in so far as that is technically, functionally and economically feasible. 2. Where the whole or any part of an individual element is proposed to be replaced and the replacement a) constitutes a major renovation; or b) (in the case of part replacement) amounts to the replacement of more than 50% of the thermal element's surface area; the whole of the thermal element must be replaced so as to ensure it complies with paragraph L1 (a)(i) of Schedule 1, in so far as that is technically, functionally and economically feasible.	
Camden Local Plan 2017		**Policy C1 Health & Wellbeing:** The Council will improve and promote strong, vibrant and healthy communities through ensuring a high-quality environment with local services to support health, social and cultural wellbeing and reduce inequalities. Measures that will help contribute to healthier communities and reduce health inequalities must be incorporated in a development where appropriate. The Council will require development to positively contribute to creating high quality, active, safe and accessible places. **Policy A3 Biodiversity:** The Council will protect and enhance sites of nature conservation and biodiversity. They will 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.	

Policy/standards	Description	Key policy & target summary	Document
		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. **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 not increasing, and wherever possible reducing, surface water runoff through increasing permeable surfaces and use of Sustainable Drainage Systems, and incorporating bio-diverse roofs, combination green and blue roofs and green walls where appropriate. **Policy CC3 Water & Flooding**: The Council will seek to ensure that development does not increase flood risk and reduces the risk of flooding where possible. The council will require developments to incorporate water efficiency measures. **Policy 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. 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. They 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. The council will make sure that developments include facilities for the storage and collection of waste and recycling. **Policy T1 Prioritising walking**, cycling and public transport: The Council will seek to ensure that development 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.	
Camden CPG Energy & Efficiency & Adaptation **January 2021**	The Council has prepared this Camden Planning Guidance (CPG) on Energy and resources to support the policies in the Camden Local Plan 2017. This guidance is therefore consistent with the Local Plan and forms a Supplementary Planning Document (SPD) which is an additional "material consideration" in planning decisions.	This guidance provides information on key energy and resource issues within the borough and supports Local Plan Policies CC1 Climate change mitigation and CC2 Adapting to climate change. All development in Camden is expected to reduce carbon dioxide emissions by following the energy hierarchy in accordance with Local Plan policy CC1.	

4. Sustainability

This section summarises the relevant sustainability aspects for the Euston House development so a holistic view of the suitability measures can be viewed.

4.1. Climate Change

Climate change adaptation has been considered during the design development of the Euston House Project.

This is an existing retained building with no works proposed to the external façade or windows. It is proposed to provide a new roof covering over the existing central atrium of the building which will provide shading to this area.

The Environment Agency Flood Risk map has been reviewed and the site is located in flood zone 1 (see section 4.5) and is therefore at low risk of flooding. As this is an existing building on a site of less than 1ha in flood Zone 1, a full flood risk assessment is not required for planning purposes.

The existing building services plant in the building will be upgraded with improved efficiency plant as part of this refurbishment. A full Energy Strategy is not required as this is not a Major application.

Currently there is no planting or landscaping on the site. It is proposed to provide planted balconies on the East façade, and a terrace at roof level which may help with run off and reducing the urban heat island effect, as well as improving the biodiversity condition of the site.

The extension is small as the building is predominantly being reused providing a reduced carbon impact versus a new build option as the structure, basements and façade is being retained. Thus having a low embodied carbon impact.

4.2. Energy

Camden's Energy Efficiency & Adaptation CPG requires all developments to reduce carbon emissions by following the energy hierarchy in accordance with Local Plan Policy CC1. Local Plan Policy CC1 requires all development to reduce carbon dioxide emissions through following the steps in the energy hierarchy. Buildings designed in line with the energy hierarchy prioritise lower cost passive design measures, such as improved fabric performance over higher cost active systems such as renewable energy technologies.

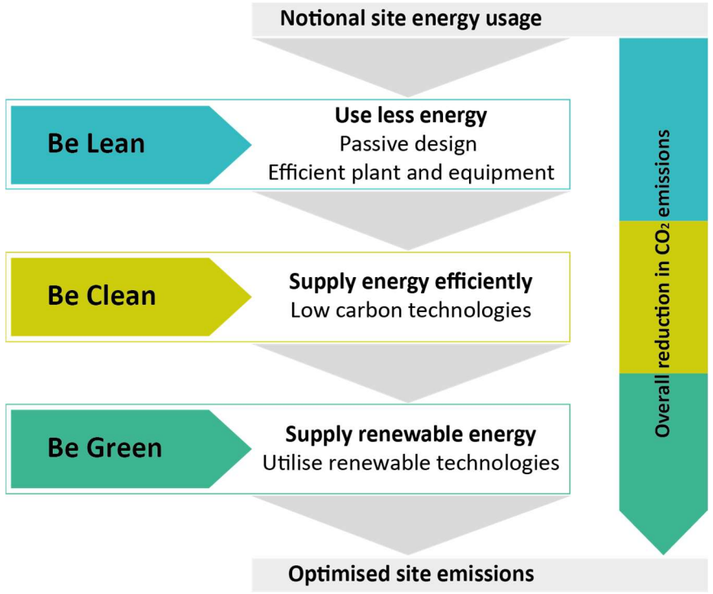


Figure 1 Energy hierarchy approach

- Be Lean: Passive and energy efficiency measures are incorporated in the design, including optimised levels of thermal insulation in new elements. Heat loss will be reduced by the provision of the roof over the atrium making the atrium walls which were previously external internal. Enhancing the lightwell at the rear of the building to bring more light to the heart of the ground and lower ground floor. Lighting to new areas will be LED lighting with appropriate controls.
- Be Clean: There are currently no existing or planned heat networks in the vicinity of the building.
- Be Green: There are no works to building services proposed as part of this minor application.

4.3. Ecology

As part of the proposed development, areas of landscaping and external space will be provided on balconies at each office level, to improve biodiversity on the site, and enhance staff wellbeing. There are currently no areas of planting present on the site.

4.4. Water

There are no installations or upgrades to sanitaryware proposed as part of this development.

4.5. Flood Risk

This is an existing building on a site which is completely developed. There will be a small area of extension to the upper floors of the building. The EA flood map for the building is shown below, which shows that the site is not at risk of flooding.

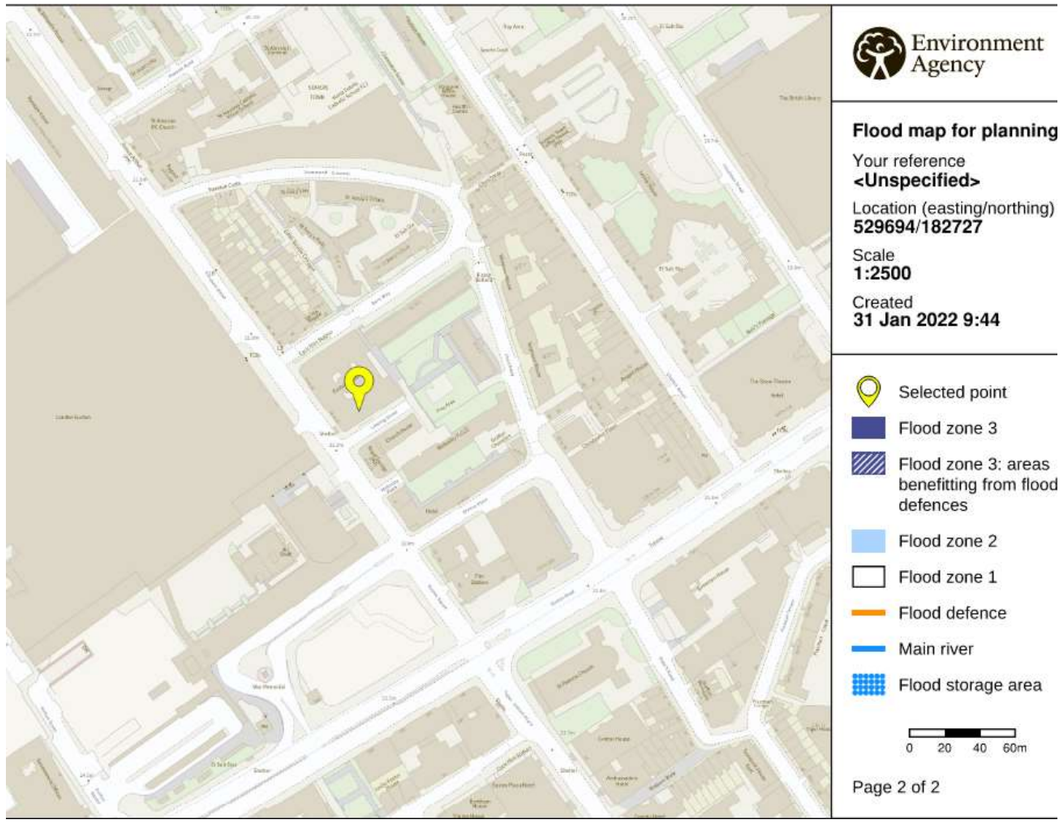


Figure 2 EA Flood Map showing site is in Zone 1

4.6. Pollution

A range of actions have been undertaken to minimise pollution for the building.

4.6.1. Noise

Any new building services plant installed will be designed to be at least 5dB lower than background noise throughout the day and night. It will also be in compliance with Camden's Local Plan policy A4 on Noise & vibration.

4.6.2. Air

During construction, the contractor will be required to minimise dust and emissions and include appropriate mitigation measures in a Construction Management Plan in accordance with Local Plan policy CC4 Air Quality.

4.6.3. Light

Light pollution will be avoided through the specification of efficient external lighting complying with the ILP Guidance Notes for the Reduction of Obtrusive Light 2011.

All external lighting (except those required for security purposes) will be connected to a time control device to ensure they are not operated between the hours of 23:00hrs and 07:00hrs.

4.7. Materials

The team have chosen to retain the existing building rather than demolish and replace it. This will have a significant effect on the embodied carbon of the development. The design intent is to ensure as many of the materials as possible are sustainably sourced and do not have a high embodied energy. Materials will be selected where possible from the BRE Green Guide to minimise the embodied energy.

At this early stage of the design process material selections and sourcing decisions have not been made. This will be considered in detail as the design progresses.

Wherever possible and appropriate recycled materials will be incorporated into the design. The design has sought to maximise resource efficiency by designing out waste.

The structural design of new elements will aim to be as 'lean' as possible, maximising the use of direct load paths wherever possible to minimise materials. Wherever possible the VOC content of paints, glues and carpets, etc. will be minimised.

It is envisaged that:

- All timber and timber products will be responsibly sourced (FSC certified, applies to formwork and other miscellaneous items);
- Peat & natural limestone will not be specified;
- All materials and insulation products shall have a GWP < 5; and
- Designing out waste will be considered, with actions to increase material efficient considered to BS 8895 during design phases.

4.8. Transport

The site is well served by public transport, being adjacent to Euston Rail station, and with a PTAL rating of 6b, the highest possible. To further enhance the building's sustainable transport options, improved cyclist facilities are proposed as part of this refurbishment, including a new entrance for cyclists on Lancing Street, which will provide an improved access to the basement cyclist facilities. A new cycle lift will also be provided.

4.9. Construction

A site waste management plan will be developed for the project during the detailed design stage of the project. This will aim to minimise the waste created and ensure that at least 80% of waste (by volume) is diverted from landfill. The SWMP will set out commitments for:

- Minimise material use - 'Design out waste', following BS 8895;
- Reduce waste generated on-site; and
- Develop and implement procedures to sort and reuse/recycle construction and demolition waste on-site and off-site.

The contractor will be contractually responsible for ensuring the site is managed in accordance with best practice. A Considerate Constructors Scheme score of 40 or more is currently targeted.

Throughout the construction process the main contractor will be required to:

- Monitor the environmental impacts of their activities by setting targets and recording energy and water consumption throughout construction;
- Operate an ISO14001 compliant Environmental Management System;
- Ensure that all temporary site timber used during construction complies with the UK Government Timber Procurement Policy by ensuring that 100% of temporary site timber is FSC or PEFC certified;
- The main contractor will also be encouraged to monitor the carbon dioxide emissions arising from the transport of construction materials waste materials to and from the site; and
- The main contractor will be required to appoint a site sustainability champion, to help oversee the sustainability aspects of the project and report on a regular basis.
- Identify the potential scale (large, medium, small) of dust emissions for each stage of work;
- Identify the level of risk due to the scale of dust emissions on health, soiling (dirt) and the natural environment, depending on activities, their intensity and the sensitivity of receptors; and
- Implement best practice dust and pollution prevention measures.

5. Summary

The sustainably of this existing building will be improved by;

- improvements to biodiversity will be provided on the new building balconies
- reduced heat loss and increased shading provided by atrium roof
- improvements to access to the building for cyclists.
- Building retention resulting in a lower embodied carbon impact.