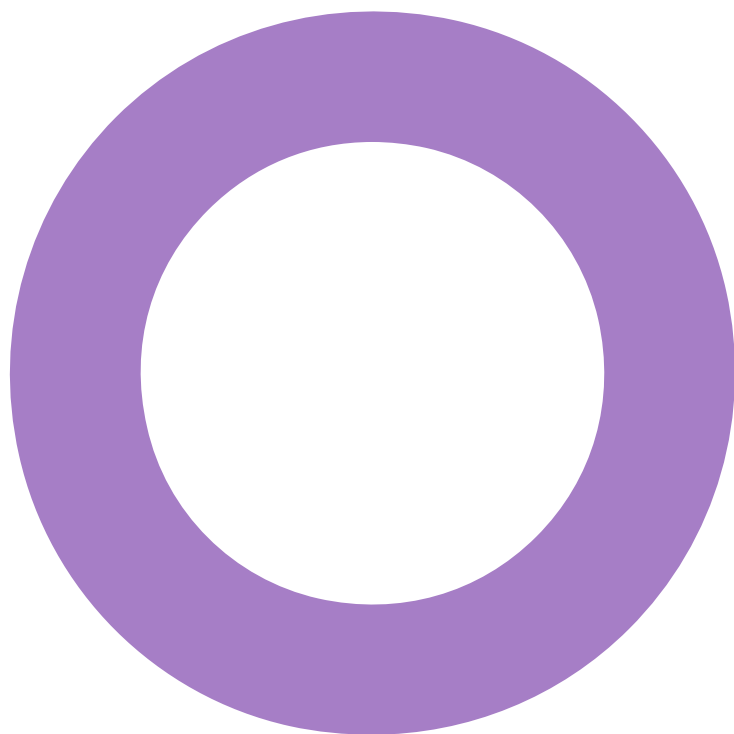


Holborn Town Hall. Holborn. Habro.

SUSTAINABILITY
SUSTAINABILITY STATEMENT

REVISION 01 – 15 NOVEMBER 2021



Audit sheet.

Rev.	Date	Description	Prepared	Verified	Authorised
01	15/11/2021	Initial Issue	VS	AF	AF

This document has been prepared for Habro only and solely for the purposes expressly defined herein. We owe no duty of care to any third parties in respect of its content. Therefore, unless expressly agreed by us in signed writing, we hereby exclude all liability to third parties, including liability for negligence, save only for liabilities that cannot be so excluded by operation of applicable law. The consequences of climate change and the effects of future changes in climatic conditions cannot be accurately predicted. This report has been based solely on the specific design assumptions and criteria stated herein.

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Executive summary.

This report presents the Sustainability Strategy for the Proposed Development which has been informed by national, regional and local policies – that is, Building Regulations Part L, the Greater London Authority (GLA) London Plan (2021) with the supplementary planning guidance documents (LPGs), and the London Borough of Camden's Local Plan (2017) along with the associated guidance documents.

1. Introduction.

1.1 The application.

This document has been prepared on behalf of Habro, hereafter referred to as the 'Applicant', in support of the full planning application for the development of Holborn Town Hall, 193-197 High Holborn, London WC1V 7BD, hereafter referred to as the 'Site'.

The Sustainability Strategy summarises the pertinent regulatory and planning policies applicable to the Proposed Development and sets out how the Proposed Development addresses the relevant policy requirements. The principles of sustainable design have been considered throughout the design process of the Development and have been incorporated where viable without causing undue impact to the fabric and appearance of the Grade II listed building.

1.2 Description of development.

The Proposed Development comprises internal alterations of the Grade II listed building to allow for the replacement of gas boiler system and radiators with a Variable Refrigerant Flow (VRF) system for heating and cooling. This will require new roof level layouts for the plant equipment and new internal layouts indicating the location of fan coil units and associated pipework.

1.3 Site description.

The Site is centred on grid reference TQ 30365 81461 and is located on the south side of High Holborn, London. The Site is entirely located within the administrative boundary of the London Borough of Camden. The basement and ground floor area of the former Holborn Library at the east of the site is in use as a restaurant with the remainder of the building currently in office use. The direct surrounding area's buildings are predominantly used as offices at upper floor level with commercial uses at ground floor.



Figure 1: Front façade from street.

2. Review of Technical Studies.

A Plant Noise Assessment has been carried out by Hoare Lea Acoustics for the client to aid design decisions to reduce the effect of noise from the additional plant. Noise emissions were assessed against target values from the proposed plant at roof level with acoustic screening. It was concluded that external plant noise emissions should not pose an obstacle in the granting of planning permission for the proposed refurbishment. The report details the target noise levels for the offices to the east and west (calculated as 5dB below typical background sound levels) for the daytime as the plant is assumed to operate only in the daytime. With the described noise mitigation measures, the report predicts that the target sound levels will be met at both the receptors on the east and west of the Site.

A Heritage Significance Statement was prepared for Habro to contextualise the historical significance of the Site. The significance plans from the Heritage Statement determined that the development proposals will not have any substantial impact on the areas of high heritage significance.

3. Policy context and drivers.

3.1 Relevant national and local policy documents.

- The relevant sustainability policy documents for the proposed development:
- The National Planning Policy Framework (NPPF) (July 2021)
 - Climate Change Act (2008)
 - The Building Regulations Part L Conservation of Fuel and Power (2010)
 - The London Plan (LP) (March 2021)
 - London Plan Guidance (LPGs) documents
 - London Borough of Camden (LBC) Council’s ‘Camden Local Plan’ (2017)
 - Camden Planning Guidance (CPGs) documents

3.2 Review of proposals against planning policies

A summary of how the proposed Development adheres to the planning policies in Section 3.1 is presented below. The key sustainability policies and associated commitments for the proposed Development have been broken down by topic. Within each topic, planning policies derived from London Plan 2021 and associated LPGs, LBC’s Local Plan 2017 and associated CPGs have been outlined together with the detail of the Development’s compliance.

Land, Site Layout and Building Design

The London Plan policy GG2, ‘Making the best use of the land’ encourages the maximisation of use of the existing Site.

The LBC Local Plan policy G1, ‘Growth and Spatial Strategy’ aims to encourage high quality developments to make most efficient use of Camden’s land and buildings. In this policy, Holborn is identified as an area of growth where efficient use of space is especially important.

Planning Policy	Development Commitment
London Plan GG2; LBC Local Plan G1	<ul style="list-style-type: none">- Make more efficient use of the existing building and so optimise the use of land.- Aid the development of Holborn which has been identified as an area with significant expected growth.

Energy and Carbon Dioxide

London Plan Policy GC6A ‘Increasing efficiency and resilience’ aims to improve energy efficiency and advance London to net zero.

London Plan Policy SI2A ‘Minimising greenhouse gas emissions’ highlights the needs for developments to reduce the amount of energy used during operation.

London Plan Policy SI3C ‘Energy Infrastructure’ states the requirement for the development to identify the need for upgrades to existing infrastructure. The proposed development requires an upgrade to the power network to account for the electricity demand of the VRF.

The London Plan Policy SI4 encourages reducing the risk of overheating first by passive means to reduce the reliance on air conditioning. This can be achieved by the thermal mass of the stone walls on the Site.

According to the Parliamentary Office of Science and Technology, the carbon footprint of gas boilers is significantly higher than that of electric heating technologies. VRFs use of grid electricity benefits from the decarbonisation of the grid and serves to futureproof the Development to be of lower emissions than a gas

boiler. As such, LBC’s Local Plan Policy CC1 ‘Climate change mitigation’ encourages the proposed development’s replacement of gas boilers with a VRF.

Over 90% of LBC’s carbon dioxide emissions are produced by the operation of buildings. The proposed Development will therefore support LBC’s carbon dioxide reduction strategy by employing a VRF with a high COP to maximise energy efficiency and removal of carbon dioxide emissions from a gas boiler.

LBC Plan Policy D2 ‘Heritage’ encourages only energy use reduction initiatives that do not harm the fabric or appearance of the building. The policy protects the special architectural and historic interest of the listed building.

Planning Policy	Development Commitment
London Plan Policy GC6A; LBC Local Plan Policy CC1	<ul style="list-style-type: none">- The heat pump VRF systems have a high COP and therefore efficiency, more so that the existing gas boiler.- Kit with high seasonal efficiency will be used with values as follows:<ul style="list-style-type: none">o Large outdoor VRF units: 6.2o Small heat pumps: 8.1o DX Split Units: 6.6- The building itself has a high thermal mass due to its stone walls, helping to reduce the cooling demand and decreasing the building’s energy consumption.- Any upgrades to electrical infrastructure such as panel boards and distribution boards will increase the energy efficiency of the building.- Any upgrades in light fittings will be low energy.- Such increases in energy efficiency and the reliance of grid electricity rather than gas will decrease the associated carbon dioxide emissions.
London Plan Policy SI3C	<ul style="list-style-type: none">- The proposed Development requires an upgrade to the existing electrical infrastructure and a quote for such work has been sought with UKPN.
LBC Plan Policy D2	<ul style="list-style-type: none">- The proposed Development will reduce energy consumption but will not cause harm to the fabric or appearance of the building. The use of a VRF is the best option to minimise the impact of pipework on the historic fabric. The proposed Development will make more efficient use of the existed listed building by ensuring the office spaces within it can be utilised more profitably and efficiently, ensuring its longevity.

Flood and Water Efficiency

London Plan Policy GC6B ‘Increasing efficiency and resilience’ seeks to ensure the efficient use of water.

London Plan Policy SI 12 ‘Flood risk management’ and LBC Local Plan Policy CC3 aspire to guarantee that the development does not increase flood risk and reduces the risk of flooding where possible.

London Plan Policy SI5 ‘Water infrastructure’ encourages water consumption minimisation measures such as smart metering and stipulates that Developments should achieve at least the BREEAM excellent standard for the ‘Wat 01’ water category.

Likewise, LBC Local Plan Policy CC3 ‘Water and flooding’ aims to incorporate water efficiency measures into developments to reduce water consumption.

Planning Policy	Development Commitment
London Plan Policy GC6B; LBC Plan Policy CC3	<ul style="list-style-type: none">- The proposed Development will not change the volume or rate of surface run off and does not increase flood risk.- The proposed Development is not in a flood risk zone identified by LBC.
London Plan Policy SI5; LBC Local Plan Policy CC3	<ul style="list-style-type: none">- The Proposed Development will specify water efficient fixtures, fittings and appliances, and include measures to encourage efficient water use- The achievement of BREEAM excellent standard for water, as required by LBC Local Plan Policy CC3 for refurbishments.

Materials and Waste

The LPG and CPG encourages the considered choice and use of good quality and sustainable building materials, to maintain a high quality and healthy internal and external environment. LBC’s CPG Design Guidance document outlines Camden’s commitment to using sustainable materials that are responsibly sourced and safe to health. The choice of materials should take into account their embodied energy and the potential for re-use and recycling.

Planning Policy	Development Commitment
LBC CPG Design Guidance	<ul style="list-style-type: none">- The proposed Development will use materials that have a low embodied energy with A/A+ Green Guide Ratings except in cases where these materials will negatively affect or are sensitive to the building’s character.- Any paintwork undertaken in the building will use paint with low volatile organic compound (VOC) content.- Where possible materials will be sourced from suppliers able to demonstrate responsible sourcing and where not possible, every effort will be made to procure the product from suppliers who have a certified Environmental Management System.- The addition of a VRF system will increase the usability of the current historic building. Upgrading the site will prolong the life of the building, resulting in a reduction in waste and material use compared demolition and construction of a new building.

Nature Conservation and Biodiversity

The London Plan Policy G6 ‘Biodiversity and access to nature’ encourages a net increase in biodiversity in development plans and encourages the identification and rectification of sites with a deficiency in access to nature.

LBC Local Plan Policy A3 Biodiversity aims to ensure that sites of nature conservation and biodiversity are protected and enhanced.
LBC CPG Biodiversity aims to ensure that developments assess their impact on potential species and/or habitats and identify any opportunities for enhancement. LBC guidance relating to protection and enhancement of biodiversity for minor developments is applicable when they are in close proximity to or have the potential to affect biodiversity. This relates to protected sites or protected/priority species.

Planning Policy	Development Commitment
London Plan Policy G6	<ul style="list-style-type: none">- The proposed development will not change the biodiversity at the site has good access to surrounding green spaces such as Lincoln’s Inn Fields and Bloomsbury Square Gardens.
LBC Plan Policy A3; LBC CPG Biodiversity	<ul style="list-style-type: none">- There is minimal existing biodiversity resource on the Site due to its existing build form and the proposed Development will cause no harm to biodiversity or conservation sites.- No loss of vegetation and trees will be required in the building upgrade or in upgrading the electrical connection.

Adapting to Climate Change

London Plan Policy GC6B ‘Increasing efficiency and resilience’ seeks to ensure buildings are designed to adapt to climate change and reduce the impact of natural hazards like heatwaves. The London Plan predicts hotter summers, less rain and more extreme weather events in future due to climate change.

The LBC Local Plan Policy CC2 requires developments to be resilient to climate change by adopting measures to passively or actively maintain comfort in the building.

Planning Policy	Development Commitment
London Plan Policy GC6B; The LBC Local Plan Policy CC2	<ul style="list-style-type: none">- The installation of the heat pump VRF for the provision of future heating and cooling acts to mitigate against climate change within the building, allowing for continued use of a listed building

Land Contamination

Land contamination is not an issue in the case of this site as no ground works will be required. During the refurbishment, any asbestos identified will be removed by a suitably qualified contractor appointed in line with legal requirements.

Air Pollution

London Plan Policy GC3F ‘Creating a healthy City’ and Policy SI1 ‘Improving air quality’ aim to improve air quality and reduce public exposure to air pollution. Policy SI1B states that development proposals must be ‘at least Air Quality Neutral’.

LBC Local Plan Policy CC4 ‘Air Quality’ aims to mitigate any impact of the development on air quality and ensure that exposure to poor air quality is reduced. Policy A1 ‘managing the impact of the development’ calls for the limitation of the disturbance from dust due to construction and demolition. Further direction relating to air emissions relating to construction and demolition, combustion of fuel within the building and on the transport related to the building is outlined in LBC’s CPG 6 – Amenity, Section 2 – Air Quality.

Planning Policy	Development Commitment
London Plan Policy GC3F; London Plan Policy SI1; LBC Local Plan Policy CC4	<ul style="list-style-type: none">- Harmful effects on air quality from plant for heating and cooling the building will be minimised through the selection of modern efficient heat pump VRF units over a gas boiler by removing flues.

Planning Policy	Development Commitment
	<ul style="list-style-type: none">- The site is well connected, with Public Transport Accessibility Level rating for the Site being 'excellent', the highest possible rating. Due to the small-scale nature of the proposed Development, it is not expected to greatly increase the occupancy of the building and so the impact of emissions relating to increased transport of occupants to the building is considered negligible.

Heritage Conservation

London Plan Policy HC1A 'Heritage conservation and growth' calls for the identification, understanding, conservation and enhancement of historic heritage access and the improvement of access to them. LP policy HC1C encourages the conservation and management of the heritage assets by avoiding harm to and identifying enhancement opportunities of the assets.

Similarly, LBC's Local Plan Policy D2 seeks to preserve and enhance listed buildings. The council will resist proposals that would cause harm to the special architecture, historic interest or significance of a listed building.

Planning Policy	Development Commitment
London Plan Policy HC1A; London Plan Policy HC1C; LBC's Local Plan Policy D2	<ul style="list-style-type: none">- As informed by the Significance Plans from the Heritage Significance Statement prepared for Habro , the proposed Development will adhere to the London Plan Policy HC1, to conserve and enhance the historic environment, as well as contributing to the economic viability by improving comfort levels and thus productivity in the office spaces.- The proposed Development will not cause harm to the special architecture, historic interest or significance to the Grade II listed building.

Economy

London Plan policy E1 calls for the improvement of the quality, flexibility and adaptability of office spaces of different size by refurbishment.

LBC Plan Policy E1 aims to improve the quality of the office spaces in Camden while Policy E2 aims to 'encourage the provision of employment premises'.

Planning Policy	Development Commitment
LBC Local Plan E1; London Plan E1	<ul style="list-style-type: none">- The Development supports the maintenance of suitable business premises in Holborn, one of the identified growth areas of Camden. This Development safeguards existing employment sites by upgrading the site to meet the needs of employers.- The Development will encourage the letting of the currently vacant units by improving thermal comfort and make the Site more profitable.

Noise

London Plan Policy D14 outlines the noise management and mitigation strategies relevant to the proposed Development.

LBC Local Plan Policy A1 'managing the impact of the development' aims to safeguard the quality of life of occupiers and neighbours, including the impact of noise and vibration. This is further addressed in Policy A4 'noise and vibration' and further guidance is provided in CPG 'Amenity'.

The LBC 'Amenity' CPG encourages noise to be reduced at the source in the first instance to reduce the need for mitigation measures.

Planning Policy	Development Commitment
LBC Amenity CPG; LBC Local Plan Policy A1; LBC Local Plan PolicyA4	To ensure that the proposed Development does not become a source of noise pollution, noise mitigation recommendations from the Plant Noise Assessment prepared by Hoare Lea Acoustics on behalf of Habro will be followed to meet the target sound levels.

4. Conclusion.

The design of the Proposed Development is based on sustainable design and construction principles as informed by national, regional and local planning requirements and industry best practice, that is, Building Regulations Part L, the Greater London Authority (GLA) London Plan (2021) along with the associated guidance documents and the London Borough of Camden's Local Plan (2017) along with the associated guidance. The proposed alterations have been designed to minimise the effect to the historic fabric and appearance of the Grade II listed building while its comfort and usability. To deliver the most sustainable Development possible within the confines of the heritage restrictions the key initiatives and commitments highlighted in this statement would be implemented throughout the detailed design and construction phases.

4.1 Key Sustainability Features.

The proposed development includes:

- The installation of high coefficient of performance heat pump VRF units to deliver heating and cooling to the building in replacement of the gas boiler.
- More efficient use of the existing site in Holborn, an identified area of growth in Camden.
- The use of water efficient fittings to reduce water consumption to achieve an excellent rating as per the BREEAM Wat 01 requirements.
- The use, where feasible and sensitive to the character of the building, materials with low embodied energy with A/A+ Green Guide Ratings.

4.2 Construction Phase.

Initiatives that would be delivered in order to support the implementation of the Development and promote sustainability throughout the construction phase include:

- Implementation of the Site Waste Management Plan (SWMP), including waste minimisation, recycling targets and adherence to the Institution of Civil Engineers (ICE) Demolition Protocol.



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