Camden Goods Yard, London, NW1 8EH
Juniper Revisions – PFS Site

Sustainability Statement Addendum

August 2022

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This document has been prepared and checked in accordance with
Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS EN ISO 45001:2018)

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Comments

First issue for planning

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Updated according to final planning report version

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Comments

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1. Introduction

1.1 Background

This Sustainability Strategy Addendum has been prepared by Waterman Building Services to accompany a minor material amendment to the extant planning permission for the Camden Goods Yard development (CGY), in particular amendments to the Juniper Building (PFS Site), hereafter referred to as 'the Proposed Development'. The site is located on Chalk Farm Road, London, NW1 8EH and the application is submitted by St George West London Limited.

This document seeks to establish the revised proposals for the development and confirm any alterations to the proposals from a sustainability perspective. Where applicable, compliance with recent policy and guidance changes, that have been adopted since the original grant of planning consent, has also been evaluated for feasibility.

The general strategy approach is broadly similar to the December 2020 Consented Scheme, with the primary alterations relating to the energy and carbon emissions predictions of the development, which have been re-evaluated and optimised. The revisions relate to the Juniper Building on the PFS site. No changes are proposed to the CGY Main Site.

This addendum shall report the headline details from these revisions, with the full details available in the revised reports and addendums submitted in support of the application.

For ease of reference, this document has been formatted to follow the outline structure of the approved Sustainability Statement Addendum document, which should be referred to where this document indicates no alterations have occurred.

The project team for the Proposed Development is as follows:

Table 1: Project team

Project team	Representative
Client	St George West London Limited
Planning Consultant	Quod
Architect	Makower Architects
Daylighting Consultant	GIA
Energy Consultant	Waterman Group
Whole Life Carbon Consultant	Ramboll
Circular Economy Consultant	Energist
Transport Consultant	Ardent Consulting Engineers
Air Quality Consultant	Ardent Consulting Engineers
Noise Consultant	Ardent Consulting Engineers
Environmental Impact Assessment Consultant	Ramboll
Heritage Consultant	Turley Heritage

1.2 Site Context

Planning permission for the Morrisons Superstore and Petrol Filling Station site was originally granted on 15th June 2018 (planning application reference: 2017/3847/P) (the 'original planning permission') for 573 new homes, approximately 39,500 sqm (GEA) non-residential floorspace, including a replacement supermarket, a replacement PFS alongside new A1, A3 and B1 floorspace within a new commercial building (the Juniper Building), together with associated public realm and landscaping.

This permission was first amended via a minor material amendment application ('the first s73 application') on 5 May 2020 (reference: 2020/0034/P) These amendments related to the PFS site only albeit were not for any physical changes to the consented Juniper Building. The amendments allowed for the insertion of a new development phase (Phase 1a) to allow for a single storey temporary food store to be constructed enabling the development of the main site (the former Morrisons store site) to come forward sooner.

A second minor material amendment application was submitted in July 2020 (reference: 2020/3116/P) and approved on 3 December 2020 (referred to as the December 2020 s73). This is the current consent for the Camden Goods Yard site. This permission enabled minor amendments to Blocks A, B, C and F on the main Camden Goods Yard site only enabling the delivery of 71 additional homes (a total of 644 consented homes across the site). No amendments were secured to the PFS site as part of the December 2020 consent.

This application, the Proposed Development, will be the third minor material amendment to the extant planning permission and relates to the PFS site only. No changes are proposed to the Camden Goods Yard main site. This Sustainability Statement Addendum therefore focuses only on the proposed amendments to the consented Juniper Building on the PFS site.

The amendments to the Juniper Building are proposed to bring the planning permission up to date to enable the delivery of a high quality office building in this important town centre location whilst maintaining and building upon the design quality and sense of place that will be created by the extant permission.

Figure 1: Proposed Site Plan

1.3 Proposed Development

A summary of the proposed amendments, associated with the third minor material amendment application is as follows:

1) Removal of Petrol Filling Station
2) Reconfiguration of ground floor layout to accommodate:
   a) Additional improved office and retail floorspace and back of house functions;
   b) Enlarging the office lobby;
   c) Introducing an office lobby-café;
   d) Including a dedicated office cycle entrance;
   e) Introducing an office mezzanine level; and
   f) Replacing the Petrol Filling Station with an electric vehicle (EV) charging station (comprising four public bays).
3) Extending the building 6 metres resulting in the creation of additional office floorspace across all levels (2,207 sqm GIA) and an additional ground floor retail unit (50 sqm GIA).
4) Introduction of a mezzanine level to the first floor.
5) Ground floor windows added to the west elevation adjoining the consented Youth Space (also within PFS site) to the west.
6) Building footprint to the east adjusted (shifted 390mm westwards to improve pavement widths by 0.4m).
7) Internal reconfiguration of the Corner Building by converting the retail (F&B) floorspace on Level 2 (197 sqm GIA) to office floorspace retaining retail (F&B) at levels 1, 3 and 4 including the winter garden.
8) Reconfiguration of Morrisons floorplan to widen the frontage by one bay and reduce depth of unit to facilitate improved trading and back of house operations.
9) Rationalisation of plant space at ground floor enabling the omission of plant from 2nd floor.
10) Reconfiguration and optimisation of plant at roof level.
11) Introduction of a rear ground floor office yard terrace.
12) Minor extension to fifth floor office terrace.

Figure 2: CGI of the Proposed Scheme

2. Planning Policies for Sustainable Design

In order to ensure the delivery of sustainable development, it is important to identify any current and emerging policy requirements that are relevant, in particular any new policies since the previous Sustainability Statement was carried out for the extant planning permission relating to the PFS site parcel. This provides a detailed understanding of the guiding sustainability policy framework relevant to the Site and the Proposed Development. A desk-based review of relevant national, regional and local planning policy has therefore been undertaken.

2.1 National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) was revised in 2021. The framework sets out the Government's strategy for economic, environmental and social planning policy with the aim of promoting sustainable development in England. The NPPF includes a presumption in favour of sustainable development. This means local authorities will seek opportunities to secure developments that improve the economic, social and environmental conditions in the area.

2.2 The London Plan, The Spatial Development Strategy for London (2021)

"As the overall strategic plan for London, the London Plan sets out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years".

The London Plan dedicates multiple policies to Sustainable Design principles:

- Policy GG6 Increasing Efficiency and Resilience
- Policy D8 Public Realm
- Policy D9 Tall Buildings
- Policy D13 Agent of Change
- Policy D14 Noise
- Policy HC1 Heritage Conservation and Growth
- Policy G1 Green Infrastructure
- Policy G5 Urban Greening
- Policy G6 Biodiversity and Access to Nature
- Policy G7 Trees and Woodlands
- Policy G9 Geodiversity
- Policy SI1 Improving Air Quality
- Policy SI2 Minimising Greenhouse Gas Emissions
- Policy SI3 Energy Infrastructure
- Policy SI4 Managing Heat Risk
- Policy SI5 Water Infrastructure
- Policy SI7 Reducing Waste and Supporting the Circular Economy
- Policy SI8 Waste Capacity and Net Waste Self-Sufficiency
- Policy SI10 Aggregates
- Policy SI12 Flood Risk Management
- Policy SI13 Sustainable Drainage

2.3 Mayor of London's 'Sustainable Design and Construction': Supplementary Planning Guidance' (SPG) (2014)

The framework within the SPG outlines both the 'Mayor's Priority' (MP) mandatory policy requirements and 'Mayor's Best Practice' (MBP) preferred policy requirements. It provides implementation guidance on London Plan Policy 5.3 - Sustainable Design and Construction and a range of other London Plan policies, primarily in Chapters 5 and 7, which deal with matters relating to environmental sustainability.

2.4 Local Plan, London Borough of Camden (2017)

The London Borough of Camden Local Plan (2017) covers the Core Strategy and Development Policies up to 2031 and is the principal planning document that sets out the vision, objectives, and spatial strategy for future development in the Borough. It includes specific strategic policies and targets, development management policies and site allocations. The policies most relevant in securing sustainable design are:

- Policy E2 – Employment Premises and Sites
- Policy A1 – Managing the Impact of Development
- Policy A2 – Open Space
- Policy A3 – Biodiversity
- Policy A4 – Noise and Vibration
- Policy D1 – Design
- Policy D2 – Heritage
- Policy CC1 – Climate Change Mitigation
- Policy CC2 – Adapting to Climate Change
- Policy CC3 – Water and Flooding
- Policy CC4 – Air Quality
- Policy CC5 – Waste
- Policy T1 – Prioritising Walking, Cycling, and Public Transport
- Policy T2 – Parking and Car-free Development

2.5 Camden Planning Guidance – Energy Efficiency and Adaptation (2021)

This guidance (Ref. 2) provides information on key energy and resource issues within the borough and supports Local Plan Policies CC1 and CC2, covering topics such as:

- The Energy Hierarchy
- Making Buildings More Energy Efficient
- Decentralised Energy
- Renewable Energy Technologies
- Energy Statements
- Energy Reduction
- Energy Efficiency in Existing Buildings
- Reuse and Optimising Resource Efficiency
- Sustainable Design and Construction Principles
- Sustainable Assessment Tools

3. Sustainability Review of the Development

The desktop policy review has identified the following sustainability priority themes for the Development:

- Design and Amenity;
- Energy;
- Sustainable Drainage and Flood Risk;
- Biodiversity;
- Materials;
- Waste;
- Sustainable Transport and Accessibility;
- Pollution and Nuisance; and
- Heritage

3.1 Design and Amenity (Policies E2, A1, A5, D1, CC2)

*"*The Council will seek to protect the quality of life of occupiers and neighbours.*"* **– Policy A1 Managing the Impact of Development** (Camden Local Plan (2017)).

*"*The Council will resist development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.*"* **– Policy D1 Design** (Camden Local Plan (2017)).

Table 2: Design and Amenity

Relevant applicable policies	
Camden Local Plan (2017)	• Policy E2 Employment Premises and Sites • Policy A1 Managing the Impact of Development • Policy D1 Design • Policy CC2 Adapting to Climate Change
London Plan (2021)	• Policy D4 Delivering Good Design • Policy E1 Offices • Policy E3 Affordable Workspace
Objectives, requirements and targets	
• Ensure the existing building is not suitable for its existing business use, and that the possibility of retaining, reusing, or redeveloping the site has been fully explored • Ensure the protection of amenities for the community, occupiers, and neighbours • Ensure safe basement design with minimal impact to neighbouring buildings, local amenities, and heritage assets • Be sustainable in design and construction • Pursuing building certification standards such as BREEAM or Home Quality Mark	

In line with the extant permission and overall high sustainability aims of the proposed development, the development will meet BREEAM 'Excellent' rating. The Sustainability measures considered and incorporated into the design that contribute to the BREEAM credits include:

- High-performance, engineered façade optimising levels of insulation and shading
- Windows carefully designed to balance daylight, heat loss, heat gain, and provide occupant-controlled perimeter ventilation
- Very low energy lighting with daylight sensor control, occupancy sensing controls, and time switches
- Low carbon materials
- Recycled, sustainably and locally sourced materials will be used where possible
- All timber and timber-based products are to be FSC or PEFC certified, with a full chain of custody
- A resource management plan will be developed to minimise construction waste related to on-site construction and dedicated off-site manufacture / fabrication.
- Salvaging demolition materials for re-use
- Sustainable Drainage System with significant on-site water storage
- Proposed creation of green roof systems to all feasible roof spaces
- Incorporation of Bat, Bird and Bee habitats to be investigated
- No car parking spaces, other than those for disabled access
- High provision of cycle parking spaces
- Resource Management Plan

A Daylight and Sunlight Impact Assessment has been undertaken by GIA (Ref. 4) as part of the EIL submitted as part of this application, to assess the changes in sunlight experienced by nearby developments, as a result of the proposed scheme.

Adjoining residential receptors with the potential to be affected by the proposed amendments and the July 2022 amended proposed development have been technically assessed.

Analysis has been undertaken to demonstrate the levels of daylight and sunlight at residential receptors with the December 2020 consented scheme in situ, compared against the August 2022 amended proposed development as a whole.

The magnitude of impact and resultant likely effect in relation to the daylight and sunlight amenity, overshadowing and solar glare for the surrounding residential properties and amenity areas would vary throughout the demolition and construction stage, depending on the level of obstruction caused. The impact would almost certainly be less than that of the completed proposed development, given that the extent of permanent massing would increase throughout the demolition and construction stage, until the buildings are completed.

The August 2022 amended proposed development includes a 6m extension of the building massing on the PFS parcel to the west, which is a relevant consideration for adjoining residential receptors in terms of changes in daylight and sunlight and have therefore been technically re-assessed.

Owing to the location of the proposed extension in relation to existing sensitive amenity areas, there would be no change in overshadowing.

Finally, a change to the façade appearance has been technically assessed regarding solar glare effects.

The proposed amendments, and the amended proposed development as a whole, would not materially alter the conclusions of the daylight, sunlight, overshadowing and solar glare assessment as presented in

the 2017 ES (as amended).

3.2 Energy (Policies CC1, CC2)

"The Council will require all development to minimise the effects of climate change and encourage all developments to meet the highest feasible environmental standards" – **Policy CC1 Climate Change Mitigation** (Camden Local Plan (2017)).

"All development should adopt appropriate climate change adaptation measures such as measures to reduce the impact of urban and dwelling overheating." **– Policy CC2 Adapting to Climate Change** (Camden Local Plan (2017)).

Table 3: Energy

Relevant applicable policies	
Camden Local Plan (2017)	• Policy CC1 Mitigating Climate Change • Policy CC2 Adapting to Climate Change
London Plan (2021)	• Policy SI2 Minimising Greenhouse Gas Emissions • Policy SI3 Energy Infrastructure • Policy SI4 Managing Heat Risk
Objectives, requirements and targets	
• Promote Zero Carbon design • Application of the cooling hierarchy to reduce overheating risk • Achieve a minimum on-site reduction of at least 35% beyond Building Regulations Part L • Generate at least 15% of energy needs from renewable energy	

The Energy Statement Addendum produced by Waterman Building Services (Ref. 5) has taken a three-step approach to reducing the building's carbon dioxide emissions in line with the energy hierarchy detailed in the London Plan:

- **Be Lean** - Reduce the building's energy requirements by incorporating passive and active design measures and using energy efficient mechanical and electrical engineering systems.
- **Be Clean** - Reduce the building's carbon dioxide emissions by supplying energy more efficiently including through the supply of heat and electricity delivered by combined heat and power (CHP).
- **Be Green** - Reduce the building's carbon dioxide emissions through the use of renewable technologies.

3.2.1 Be Lean

"Be Lean" measures refer to passive design and energy efficient solutions. The Proposed Development for the Juniper Building is seeking to maximise the potential of the measures by the strategy outlined in the following sections. In order to reduce the energy demand of the development, a mixture of a fabric first approach (to maximise passive savings) and active measures will be implemented.

The minimum U-values required to comply with Building Regulations can be found in Table 4. It is recommended that these exceeded, to maximise the thermal performance of the building envelope.

Table 4: Model Fabric Performance Data

Element	Target U-values (Area weighted) W/m²K
Wall / Cladding	1.00
Wall / Non-Cladding • External walls between heated and unheated spaces	0.15
Floor • Exposed floor • Ground floor • Slab between heated and unheated space	0.10
Roof • Main Roof • Ceiling of heated space below terraces, balconies	0.12 0.15
Glazing • Glazing and glazed doors, including frames	1.00 g-value (see below)
Party Wall	Fully Filled and Sealed
Air Permeability	< 3.0 $m^3/m^2/hr$ @ 50 Pa

Office glass g-value/ LT value: a passive flu wall combined system g value (g_{eff}) with blinds in use of 0.09 and 0.42 with blinds up and respective LT values of 0.68 blinds up and 0.10 blinds down.

Retail glass g-value 0.40, LT value 0.70

As per Policy SI4 of the London Plan (2021), major developments should demonstrate how they will reduce the potential for overheating and reliance on air conditioning systems. This has been demonstrated through the implementation of passive and active design measures:

- Heat generation will be minimised through the specification of energy efficient ventilation systems, insulation on pipework and low energy lighting.
- The amount of heat entering the building will be reduced by:
  - Energy efficient facades with appropriate proportions of glazing
  - A glazing shading coefficient carefully selected to minimise solar gain in the summer, but also to maximise solar gain in winter.
- Ventilation will be provided by heat recovery air handling units.
- Comfort cooling will be provided in the office spaces where required. Note that the results of the Energy Strategy demonstrate that the cooling demand is lower than that of the notional benchmark.

The results of the Be Lean modelling demonstrate that a carbon reduction of ~16% against Building Regulations Part L has been achieved across the PFS Parcel Site

3.2.2 Be Clean

During the determination of the December 2020 extant consent LB Camden confirmed that the District Heating Network would not be proceeding to the boundary of the Camden Goods Yard project. All s016

obligations to connect into the DHN were removed.

3.2.3 Be Green

The viability of several low and zero carbon technologies have been appraised against technical, physical, and financial feasibility:

- Wind Turbines
- Ground Source Cooling
- Air Source Heat Pumps (ASHP)
- Biomass Boilers
- Solar Photovoltaic Panels.

Of the above, ASHP and Photovoltaic Panels have been considered feasible for the scheme and result in an overall improvement of ~56% over the baseline emissions using SAP10 carbon emission factors.

3.3 Water (Policy CC3)

"We will require development to incorporate water efficiency measures." **– Policy CC3 Water and Flooding** (Camden Local Plan (2017)).

Table 5: Water

Relevant applicable policies	
Camden Local Plan (2017)	• Policy CC3 Water and Flooding
London Plan (2021)	• Policy SI5 Water Infrastructure
Objectives, requirements and targets	
• Incorporate water efficiency measures	

Within the BREEAM 2014 New Construction Pre-Assessment, 3 credits out of a possible 5 have been targeted for Wat01: Water Consumption, and 1 credit out of a possible 1 have been targeted for Wat04: Water Efficient Equipment. This corresponds to a 40% improvement over the baseline.

To achieve this, several water efficiency measures have been proposed, including:

- All non-residential sanitary facilities shall use low-water fittings in accordance with BREEAM guidance
- Individual water meters supplied on the mains water supply to each individual commercial premises. This will ensure that water consumption can be monitored and managed and therefore encourage reductions.
- An automatic water leak detection system, capable of detecting a major water leak on the mains water supply within the building, will be incorporated.

3.4 Sustainable Drainage Systems and Flood Risk (CC2, CC3)

"All development should adopt appropriate climate change adaptation measures such as not increasing, and wherever possible reducing, surface water run-off through increasing permeable surfaces and use of Sustainable Drainage Systems." **– Policy CC2 Adapting to Climate Change** (Camden Local Plan (2017)).

"Ensure that development does not increase flood risk and reduces the risk of flooding where possible." **– Policy CC3 Water and Flooding** (Camden Local Plan (2017)).

Table 6: Sustainable Drainage Systems and Flood Risk

Relevant applicable policies	
Camden Local Plan (2017)	• Policy CC2 Adapting to Climate Change • Policy CC3 Water and Flooding
London Plan (2021)	• Policy SI12 Flood Risk Management • Policy SI13 Sustainable Drainage
Objectives, requirements and targets	
• Maintaining and, where possible, reducing surface water run off • Avoid harm to the water environment and improve water quality • Achieve greenfield runoff rates through the drainage hierarchy, utilising SuDS	

No significant alterations have occurred regarding the flood risk and drainage strategy for the development, which largely remain per the consented scheme proposals.

Nevertheless, various SUDS measures are proposed to reduce the risk of flooding, including living roofs to most buildings on the wider site.

3.5 Nature Conservation and Biodiversity (Policies A2, A3)

"To secure new and enhanced open space and ensure that development does not put unacceptable pressure on the Borough's network of open spaces, the Council will seek developer contributions for open space enhancements." – **Policy A2 Open Space** (Camden Local Plan (2017)).

"The Council will protect and enhance sites of nature conservation and biodiversity… and seek to secure additional, trees and vegetation" – **Policy A3 Biodiversity** (Camden Local Plan (2017)).

Table 7: Nature Conservation and Biodiversity

Relevant applicable policies	
Camden Local Plan (2017)	• Policy A2 Open Space • Policy A3 Biodiversity
London Plan (2021)	• Policy G1 Green Infrastructure • Policy G5 Urban Greening • Policy G6 Biodiversity and Access to Nature • Policy G7 Trees and Woodlands • Policy G9 Geodiversity
Objectives, requirements and targets	
• Apply a standard of 0.74 sqm of open space per occupant for commercial buildings. • Protect and enhance biodiversity leading to a net gain to achieve an Urban Greening Factor (UGF) of 0.3 • Require the demolition and construction phases, 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 • Incorporate additional trees where possible • Minimise the loss of trees and vegetation of significant amenity, historic, cultural or ecological value	

A Biodiversity Net Gain (BNG) calculation has previously been undertaken for the scheme. The design of the PFS has not changed since the extant planning permission, therefore the previous BNG calculation is considered to still be applicable for this application.

Significant gains have been maintained for this Minor Material Amendment application due to the site context as a former petrol filling station and hence contains no natural habitat. The proposals continue to include a green roof, as well as proposals for additional new trees within the new ground floor yard terrace to the rear of the building for office users.

3.6 Materials (D1)

"The Council will require that development… is sustainable in design and construction and… comprises details and materials that are of high quality and complement the local character" – **Policy D1 Design** (Camden Local Plan (2017)).

Table 8: Materials

Relevant applicable policies	
Camden Local Plan (2017)	• Policy D1 Design
London Plan (2021)	• Policy D9 Tall Buildings • Policy SI7 Reducing Waste and Supporting the Circular Economy • Policy SI 2 Minimising greenhouse gas emissions
Objectives, requirements and targets	
• 20% recycled content by value • Incorporate best practice in resource management and climate change adaptation and mitigation • Materials should be high quality and complement the local character	

A Whole Life Carbon Assessment (WLCA) (Ref. 6) and Circular Economy Statement (Ref. 7) have been produced by Ramboll and Energist, respectively.

The WLCA concludes that the embodied carbon of the scheme is estimated to be 1,007 $kgCO_2e/m^2$. This is comprised of Structural elements (~34% of the total), Architectural Elements (~38% of the total) and other elements such as MEP, FFE, and External Works (~28% of the total). Further opportunities have been identified to reduce the embodied carbon of the scheme, which should be discussed within the design team to evaluate the viability of implementing each option at the next design stage.

The Circular Economy Statement proposes several principles to be considered and employed as thoroughly as possible throughout the design. These principles advise on efficient design by minimising the construction materials, and ensuring waste is minimised throughout the lifespan of the building:

1) Building in Layers
2) Designing Out Waste
3) Designing for Longevity
4) Designing for Adaptability or Flexibility
5) Designing for Disassembly
6) Using Systems, Elements, or Materials that can be Reused and Recycled

The Design Team is committed to the following material specifications, and intend to include these within

the contractor requirements:

- 25% cement replacement within concrete elements where relevant and practical
- A minimum of 20% recycled content should be specified across the Proposed Development. For the more carbon-intensive materials, higher portions of recycled content have been specified:
  - 100% recycled content of steel reinforcing bars
  - 100% recycled content for other structural steel sections
- All timber and timber-based products are to be FSC or PEFC certified, with a full chain of custody
- Prioritising low embodied carbon materials
- Materials with Environmental Product Declarations (EPDs) to be specified where possible
- Procure materials from suppliers that offer take back schemes where possible
- For the steel sections, bolted connections and clamped fittings should be preferred to welded joints to facilitate the re-use of the steel section after their end of life (EoL)
- Sourcing locally and sustainably, where possible
- Implementing protective measures where required, e.g., kickplates on doors with high pedestrian use

3.7 Waste (Policy CC5)

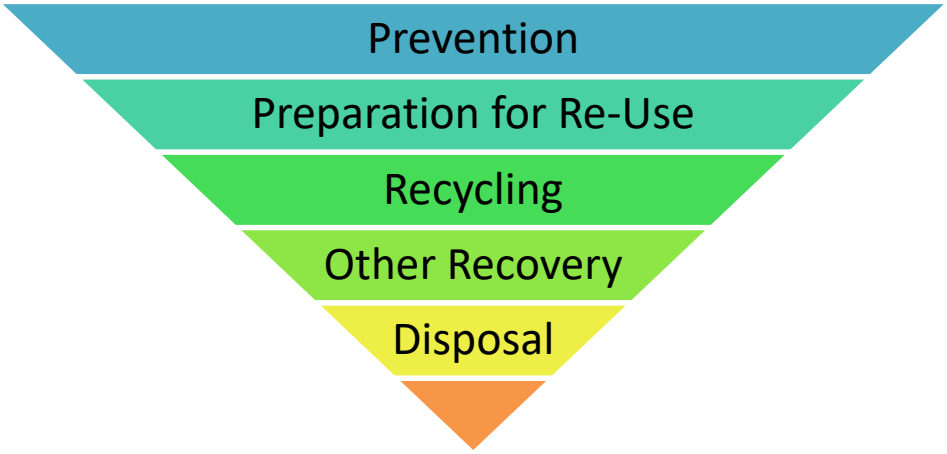
"The Council will seek to make Camden a low waste borough" – **Policy CC5 Waste** (Camden Local Plan (2017)).

Table 9: Waste

Relevant applicable policies	
Camden Local Plan (2017)	• Policy CC5 Waste
London Plan (2021)	• Policy SI7 Reducing Waste and Supporting the Circular Economy • Policy SI8 Waste Capacity and Net Waste Self Sufficiency
Objectives, requirements and targets	
• Reduce waste produced in the borough and increase recycling/reuse of materials to meet London Plan targets. • Ensure developments include facilities for the storage and collection of waste and recycling. • Meet or exceed the municipal waste recycling target of 65% by 2030 • Meet or exceed the targets for each of the following waste and material streams: – Construction and demolition – 95% reuse/recycling/recovery – Excavation – 95% beneficial use	

The Waste Hierarchy (Figure 3) should be employed to manage waste at every stage from Excavation, Demolition, Construction, Operation, and End of Life. The Waste Hierarchy guides contractors in how to manage waste at its highest value, to minimise the impact on natural resources by prioritising the prevention of waste, before reusing and recycling any that does arise. What cannot be reused or recycled will require investigation into other forms of recovery such as energy from waste, resorting to disposal once all other options have been exhausted.

Figure 3: Waste Hierarchy



3.7.1 Prevention

The prevention of waste can be achieved by sourcing pre-fabricated materials such as concrete floor planks or wall panels to eliminate construction waste on-site.

Prevention can also be achieved by minimising the quantity of materials used. For example, the adoption of an open floor plan will minimise waste associated with plasterboard, and paint. This may have additional benefits of improving air circulation within the building for internal air quality.

3.7.2 Preparation for Re-Use

When designing for disassembly through a modular construction method, preparation for re-use is more straightforward, as elements may only need unscrewing from each other and cleaned. Through disassembly, manufacturers may also offer “take-back schemes” where the materials will either be re-used or sent to specialist recycling centres.

In other situations, such as concrete, preparation may include crushing the material to be reused as aggregate. A pre-demolition audit will be undertaken to maximise the recovery of materials from demolition for subsequent high grade / value applications.

The principal contractor will develop a Resource Management Plan (RMP) covering non-hazardous waste related to on-site construction and dedicated off-site manufacture or fabrication generated by building’s design and construction. A commitment to achieving a reduction in construction waste per 100 sqm (GIA) will be made.

Communal refuse and recyclable stores will be easily accessible to all users, and sized to cater the segregation and storage of operational recyclable waste volumes by the assessed building, its occupants and activities. Where organic waste is to be stored, a water outlet is provided within the facility for cleaning and hygiene purpose.

The Camden Goods Yard site (including the PFS Site) has been allocated by LBC as a site suitable for redevelopment for commercial space. Many of the existing structures are not suitable for re-use,

however, where practicable materials shall be reclaimed and re-used on-site.

3.7.3 Recycling

Where reuse is demonstrated to not be possible, the material may be recycled into a secondary material. Examples include damaged window frames, or structural steel sections that have been bent.

During the operation of the building, recycling points for waste should be provided throughout the site to encourage the building occupants to recycle as much as possible. Clear instructions of materials that can and cannot be recycled should be made clear.

3.7.4 Other Recovery and Disposal

Once opportunities for reuse and recycling have been exhausted, other forms of recovery should be investigated, such as energy from the combustion of waste, or composting of biodegradable material.

Finally, only when no other viable methods of waste handling are available, may the waste be considered for landfill.

3.7.5 Estimated Waste Quantities

As part of the commitments to the Circular Economy Guidance[1], the scheme must commit to the following targets:

- Meet or exceed the municipal waste recycling target of 65% by 2030
- Meet or exceed the targets for each of the following waste and material streams:
  - Construction and demolition – 95% reuse/recycling/recovery
  - Excavation – 95% beneficial use

Within the Circular Economy Statement produced by Energist (Ref. 7), the quantities of construction and demolition waste, excavation waste, and municipal waste that arises throughout various life stages of the building have been estimated. These quantities are summarised in Table 10.

Table 10 Estimated quantities of waste to arise throughout the lifespan of the building

Waste Stream*	Policy Requirement**	Project Target**	Explanation
Demolition	95%	95%	A demolition audit will be conducted, confirming 95% of waste can be diverted from landfill. Demolition waste will be monitored and recorded in-line with the demolition audit, and target will form part of contractor obligations.
Excavation	95%	95%	Estimated excavation calculations have been carried out and show approximately 3,210 tonnes of excavation waste will be generated. (1824m³ total excavation, assumed 1760kg/m³ density = 3210tons. 0.24t/m2). Zero material will be removed from site as 100% will be re-used or recycled on site.
Construction	95%	95%	A Predicted Waste Management Plan has been provided

[1] Greater London Authority (2022) Circular Economy Guidance. Available at: london.gov.uk

			identifying likely waste streams and end destination. Targets will be highlighted to all subcontractors and all end destinations will be requested to ensure this is met. Local community recycling programmes will be identified for certain waste streams e.g. for timber. The Berkeley waste data tool shall be completed monthly with all details of waste leaving site.
Municipal	65%	65%	Commercial – 25.09m³ total operational waste = 6.7 tonnes/ week = 352.26 tonnes in total (50% of which should be retained for the storage of separated waste for recycling).

3.8 Sustainable Transport and Accessibility (Policies T1, T2)

"The Council will promote sustainable transport by prioritising walking, cycling and public transport in the borough" – **Policy T1 Prioritising Walking, Cycling, and Public Transport** (Camden Local Plan (2017)).

"The Council will limit the availability of parking and require all new developments in the borough to be car-free" – **Policy T2 Parking and Car-free Development** (Camden Local Plan (2017)).

Table 11: Sustainable Transport and Accessibility

Relevant applicable policies	
Camden Local Plan (2017)	• Policy T1 Prioritising Walking, Cycling, and Public Transport • Policy T2 Parking and Car-free Development
London Plan (2021)	• Policy T1 Strategic Approach to Transport • Policy T2 Healthy Streets • Policy T4 Assessing and Mitigating Transport Impacts • Policy T5 Cycling • Policy T6 Car Parking
Objectives, requirements and targets	
• Provide adequate access for all modes, including walking, cycling and public transport. • Ensure the public realm is permeable – easy and safe to walk through – and is adequately lit • Reduce travel needs and encourage high-density, high-trip generating development around transport modes. • Must be car-free and use legal agreements to ensure that future occupants are aware they are not entitled to on-street parking permits.	

A Transport Statement has been produced by Ardent Consulting Engineers (Ref. 8) to ensure that the proposals for the PFS site are suitable and in accordance with local, regional and national policy.

The newly proposed Ultra Rapid EV Charging Station has been designed with due regard to the best practice principles reflected in Manual for Streets, with suitable swept path analysis undertaken to demonstrate that the EV charging area would operate satisfactorily.

Cycle parking for the Juniper Building has been designed to exceed the London Plan's minimum standards and has been designed in accordance with Chapter 8 of 'London Cycling Design Standards'. A total of 216no. spaces have been proposed (160no. long stay and 56no. short stay).

A loading bay, accessible via the service yard, is provided to the rear of the building, which will be utilised by the Morrisons convenience store and the office use. The other uses, which are predicted to generate minimal servicing demand, will utilise the existing delivery opportunities on Chalk Farm Road.

The Transport Statement Addendum has outlined that the proposed amendments to the consented Juniper Building scheme will generate significantly less movements than the December 2020 consented PFS site. As a result, it is suggested that the proposals would provide a betterment to the operation on the surrounding highway network to that originally consented, and therefore would actually present an improvement. Hence, no mitigating improvements beyond those identified for the original full application scheme are required.

3.9 Pollution and Nuisance (Policies A1, A4, CC4)

"The Council will seek to protect the quality of life of occupiers and neighbours." – **Policy A1 Managing the Impact of Development** (Camden Local Plan (2017)).

"The Council will seek to ensure that noise and vibration is controlled and managed." – **Policy A4 Noise and Vibration** (Camden Local Plan (2017)).

"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." – **Policy CC4 Air Quality** (Camden Local Plan (2017)).

Table 12: Pollution and Nuisance

Relevant applicable policies	
Camden Local Plan (2017)	• Policy A1 Managing the Impact of Development • Policy A4 Noise and Vibration • Policy CC4 Air Quality
London Plan (2021)	• Policy D8 Public Realm • Policy D13 Agent of Change • Policy D14 Noise • Policy SI1 Improving Air Quality
Objectives, requirements and targets	
• Mitigate the impacts where it is demonstrated that the development could cause harm to air quality. • Development that involves significant demolition, construction or earthworks will also be required to assess the risk of dust and emissions impacts. • Propose remediation to deal with any identified land contamination • Minimise the noise impact from deliveries and from the demolition and construction phases of development. • Ensure that artificial lighting causes minimal disturbance to occupiers and wildlife.	

3.9.1 Air Quality

An Air Quality Technical Note Addendum has been prepared by Ardent Consulting Engineers (Ref. 9) to assess the air quality impacts of the proposed amendments and of the July 2022 amended proposed development. It has considered changes to relevant legislation, policy and guidance, changes to baseline conditions and changes to cumulative schemes, on which the July 2020 AQA Addendum (ACE, 2020) was based and whether the proposed amendments and the amended proposed development as a whole would materially alter the conclusions of the July 2020 AQA Addendum and 2017 EIA/ES (as amended).

When considering the policy changes, the outcomes of the July 2020 AQA Addendum assessment would show no significant changes for the following:

- Potential construction dust impacts
- Potential impacts associated with development-generated construction traffic
- Potential impacts associated with development-generated completed development traffic at off-site receptors
- Potential impacts associated with development-generated completed development traffic

The PFS parcel (as amended by the July 2022 proposed development) in isolation is considered to be better than ‘air quality neutral’ in terms of transport emissions in the context of both the ‘current’ and the ‘consultation draft’ guidance; i.e. no material change to the outcome of the 2020 AQA Addendum is predicted.

Furthermore, the whole application site (as amended by the July 2022 proposed development) has been determined to be substantially better than ‘air quality neutral’ in terms of transport emissions in the context of both the ‘current’ and the consultation draft guidance, i.e. there is no material change to the outcome of the 2020 AQA Addendum in the context of the whole site.

The outcome of the July 2020 AQA Addendum assessment of 'air quality neutral’ in terms of building emissions would not materially change; i.e. both the PFS parcel and the application site are better than air quality neutral’ in terms of building emissions.

Overall, it is considered that the proposed changed to the development, changes to legislation, policy, guidance and tools, updated list of cumulative schemes and changes to baseline conditions would not materially affect the outcomes of the 2020 AQA Addendum.

3.9.2 Contaminated Land

The broad principles of the consented Juniper Building remain the same and therefore the details approved in 2019 as part of the discharge of requirements of Conditions 61 (Contaminated land: HR1 Scheme of Assessment ref 2019/3105/P) and 62A (Contaminated land: HR2 Site Investigation and Remediation Scheme ref 2019/6377/P), in accordance with planning permission reference 2017/3847/P, are still applicable and satisfy any requirements for this application.

3.9.3 Noise

A Noise and Vibration Addendum has been undertaken by Ardent Consulting Engineers (Ref. 10) to demonstrate the suitability of the proposed amendments to the PFS site which involve the removal of the existing petrol filling station.

The Noise and Vibration Addendum concludes that there would be a substantial reduction in vehicle movements at the PFS parcel as a result of the removal of the petrol filling station and a slight overall reduction in vehicle movements on the surrounding road network. Therefore, noise levels associated with the July 2022 amended proposed development would be correspondingly lower. There would be no changes to the MS parcel traffic flows associated with the July 2022 amended proposed development.

The move from petrol and diesel vehicles to electric vehicles at the PFS parcel would furthermore reduce the number of impulsive noise events, associated with door slams for example, and locally reduce the level of noise from manoeuvring vehicles.

It is considered that the proposed amendments would lead to a slight reduction in noise associated with the July 2022 amended proposed development when compared to the December 2020 consented scheme. Therefore the July 2022 amended proposed development would not have a greater noise impact

and as such the conclusions of the 2017 ES (as amended) remain valid.

3.9.4 Light Pollution

External lighting will be designed in line with BREEAM 2014 Pol 04 criteria ensuring upward lighting is minimised to reduce unnecessary light pollution, energy consumption, and nuisance to nearby properties.

3.10 Heritage (Policy D2)

"The Council will preserve and, where appropriate, enhance Camden's rich and diverse heritage assets and their settings, including conservation areas, listed buildings, archaeological remains, scheduled ancient monuments, historic parks and gardens and locally listed heritage assets." – **Policy D2 Heritage** (Camden Local Plan (2017)).

Table 13: Heritage

Relevant applicable policies	
Camden Local Plan (2017)	• Policy D2 Heritage
London Plan (2021)	• Policy HC1 Heritage Conservation and Growth
Objectives, requirements and targets	
• Minimise harm and loss of significance of heritage assets	

A Heritage Statement Addendum has been prepared by Turley Heritage (Ref. 11) to assess the built heritage effects of the July 2022 s73 application for amendments to the consented proposals for the petrol filling station (PFS) parcel. Consideration has been given to the proposed amendments and the amended proposed development as a whole. It has been confirmed that there have been no changes to the built heritage baseline defined in the built heritage assessments within the 2017 ES (as amended).

The July 2022 amended proposed development would not amplify or otherwise alter the previously established levels of heritage harm from development of the MS parcel, which remains less than substantial for the purposes of the NPPF and 'calibrated' as comparatively modest in all instances.

The identified less than substantial harm must be weighed in the balance against the public benefits, which include heritage benefits, as required by paragraph 202 of the NPPF and must be accorded great weight and importance (paragraph 199 of the NPPF).

In this instance, the overarching public benefits are directly linked to the redevelopment of this important but underutilised site and the creation of a high-quality new neighbourhood and delivery of additional high-quality office floorspace in this town centre location. These substantive public benefits, and the overall planning balance, are identified in the Planning Statement prepared by Quod.

4. Conclusion

This Sustainability Statement Addendum demonstrates the Applicant's commitment to delivering a sustainable development to support the implementation of the London Borough of Camden's Local Plan and seeks to provide an update to the previous Sustainability Statement Addendum. To ensure the successful delivery of sustainable development, the key initiatives and commitments highlighted in this document would need to be implemented, monitored and reviewed during the detailed design, construction stages and subsequently during the operational phase of the Proposed Development. The Proposed Development includes a range of sustainable design and construction features including:

- Implementation of a 'fabric first' approach, in line with the Energy Hierarchy, to minimise the operational energy demand of the Development
- Implementation of lean design principles to minimise embodied carbon of the development including the incorporation of low carbon and recycled materials and materials with lower wastage rate.
- The provision of water efficient/low flow sanitaryware fittings and fixtures throughout the Development to reduce potable water consumption and foul flow.
- Allowance for sufficient waste storage areas to accommodate dedicated recyclable waste storage area with easy access and servicing.
- Development of a Resource Management Plan (RMP) by the Principal Contractor to cover non-hazardous waste related to on-site construction.
- Specification of materials with a low environmental impact and/or a responsible sourcing certification. As a minimum all timber products will be FSC or PEFC certified with full chain of custody.
- Both the PFS parcel and the application site are better than air quality neutral' in terms of building emissions and will be unaffected by changes in legislation or guidance.
- In addition to the above, the development will achieve a BREEAM Rating of 'Excellent'.

The broad principles of the consented Juniper Building remain the same and therefore the details approved in 2019 are still applicable to this Minor Material Amendment Application. However, due to improvements in the scheme, a greater emphasis has been placed on Whole Life Carbon, i.e., both operational and embodied carbon.

The Proposed Scheme presents a 56% reduction in operational carbon emissions when compared against Part L, compared with 40% to the previously approved 2020 application. This was achieved through more efficient heating and cooling systems, as well as high specification ventilation systems which will reduce fan energy by 40% over previous specified proposals.

Significant consideration has also been given to the embodied carbon and the waste that arises from the scheme's construction, use, and demolition, as well as the demolition of the existing building. The overall embodied carbon emissions have been calculated to be 1,007 $kgCO_2e/m^2$ GIA (including carbon sequestration). Further opportunities have been identified to reduce the embodied carbon of the scheme, which should be discussed within the design team to evaluate the viability of implementing each option.

The scheme is committed to minimising waste sent to landfill as much as possible. In particular:

- Meet or exceed the municipal waste recycling target of 65% by 2030, and
- Meet or exceed the targets for each of the following waste and material streams:
  - Construction and demolition – 95% reuse/recycling/recovery
  - Excavation – 95% beneficial use

5. References

Ref. 1 Camden Local Plan 2016-2031 (2017) Available at: Camden Local Plan (camden.gov.uk)

Ref. 2 Camden Planning Guidance (2021) Energy Efficiency and Adaptation Available at: Energy Efficiency and Adaptation (camden.gov.uk)

Ref. 3 Makeower Architects and Murdoch Wickham (2022) Design and Access Statement Addendum

Ref. 4 GIA (2022) Daylight and Sunlight Impact Assessment – *Found as Appendix within EIL report.*

Ref. 5 Waterman Group (2022) Energy Statement Addendum

Ref. 6 Ramboll (2022) Whole Life Carbon Assessment

Ref. 7 Energist (2022) Circular Economy Statement

Ref. 8 Ardent Consulting Engineers (2022) Transport Statement Addendum

Ref. 9 Ardent Consulting Engineers (2022) Air Quality Technical Note

Ref. 10 Ardent Consulting Engineers (2022) Noise and Vibration Addendum

Ref. 11 Turley Heritage (2022) Heritage Statement Addendum

UK and Ireland Office Locations