Holborn Links Project 1 – Vernon House, Sicilian House, and 21 Southampton Row, London

Property Sustainability Services

Sustainability Statement

July 2022

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Quality Assurance – Approval Status

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)

Issue	Date	Prepared by	Checked by	Approved by
P01	15/07/2022	Shaun Carpenter	Ankit Singh	Jason O'Loughlin

Comments

First issue for planning

Issue	Date	Prepared by	Checked by	Approved by
P02	18/07/2022	Shaun Carpenter	Anastasia Stella	Ankit Singh

Comments

Updated report according to HGH comments (Received 15/07/2022)

Disclaimer

This report has been prepared by Waterman Building Services Limited, with all reasonable skill, care and diligence within the terms of the Contract with the client, incorporation of our General Terms and Condition of Business and taking account of the resources devoted to us by agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

This report is confidential to the client and we accept no responsibility of whatsoever nature to third parties to whom this report, or any part thereof, is made known. Any such party relies on the report at its own risk.

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This report demonstrates the Applicant's commitment to delivering a sensitive and sustainable restoration of a tired and inefficient mix of Grade II listed office and retail buildings to support the implementation of the London Borough of Camden's Local Plan. The proposals will enhance, activate, and enliven the existing Grade II listed buildings that will deliver high quality commercial floorspace that will attract businesses and create new employment opportunities, whilst securing the Site's viable long term sustainable future. In order to adapt to the future projected climate, efforts have been made to optimise the thermal efficiency against resulting embodied carbon whilst ensuring maximum flexibility of use through structural specifications and internal floor layouts.

To ensure the successful delivery of a 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 subsequent operational phase of the Development.

The desktop policy review has identified the following sustainability priority themes for the Development in order to comply with Camden Local Policy.

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

The Proposed building will provide significant improvements in thermal performance, water and energy consumption, whilst minimising construction and demolition waste through the reuse of existing materials, including significant efforts to preserve and minimise disruption to historical elements of the building during construction. In addition to the above, it is proposed that the development will achieve a BREEAM Rating of 'Excellent'.

2. Introduction

2.1 Background

This report has been prepared by Waterman Building Services to accompany an application for full planning permission for Holborn Links Project 1, located in the London Borough of Camden ("the Site"), hereafter referred to as 'the Proposed Development'.

This Sustainability Statement prepared by Waterman Building Services Limited describes the approach the design team has taken to integrate and consider sustainability during the design process. The purpose of this report is to assess the extent of which the Development accords with the principles of sustainable development and the relevant planning policy requirements.

The project team for the Development is comprised as follows:

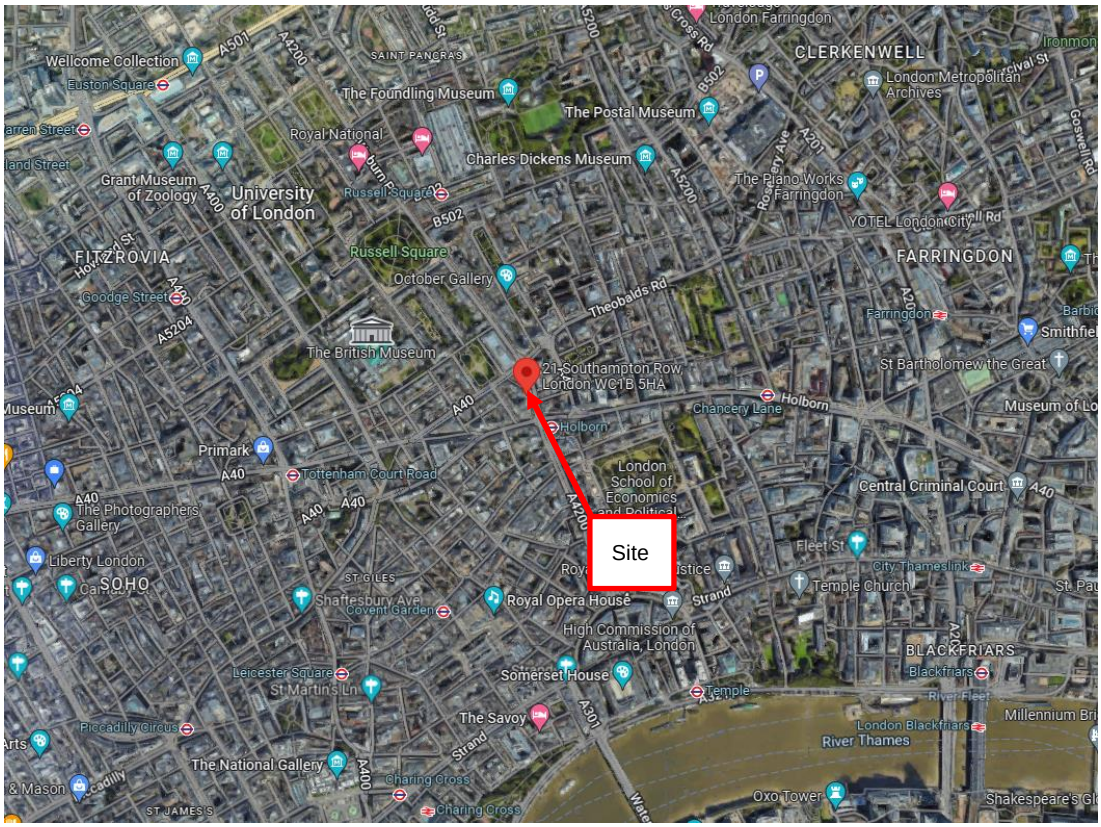
Table 1: Project team

Project team	Representative
Development Manager	Alchemy Asset Management
Project Manager	Gleeds
Planning Consultant	HGH Consulting
Architect	Hale Brown Architects
Cost Consultant	Gleeds
Structural Engineer	Heyne Tillett Steel
Energy Consultant	Waterman Group
Ecologist	Waterman Group
Transport Consultant	Waterman Group
Air Quality Consultant	Waterman Group
Noise Consultant	Waterman Group
Townscape and Heritage Consultant	Iceni

2.2 Site Context

The site is located at the north end of Southampton Row on the junction with Bloomsbury Way/ Vernon Place. The site comprising 21 Southampton Row, Vernon & Sicilian House is approximately 0.146 hectares. This includes a rear servicing yard that currently provides access to the buildings. Sicilian Avenue in front of the buildings is approximately 0.046 hectares. All the buildings are Grade II listed and are located within the Bloomsbury Conversation Area. To the north of the site is Bloomsbury Square Gardens, London's oldest square laid out in 1665. The northern corner of the site is visible from the gardens.

Figure 1: Location of the Site, Circled



2.3 Proposed Development

The development looks to provide upgraded office spaces through internal alternation works, a small extension to Vernon House at the existing 5th floor, together with new plant equipment, cycle parking spaces and other associated works. At ground floor, the development looks to provide an improved office entrance experience from the street to the office demises of Vernon - Sicilian House & 21 Southampton Row, as well as reposition the existing retail units to current market requirements, while retaining the existing frontages.

The application description set out within the planning application submission is:

'Full planning and listed building consent for internal refurbishments and external alterations'

Key objective proposals include:

- Retain and restore the historic street frontages of the buildings to Sicilian Avenue.
- Review and update the currently vacant retail provision, while focusing on retaining the historic retail frontage.
- Improve the entrance experience from Sicilian Avenue to the office demises of 21 Southampton Row, Vernon & Sicilian House
- Improve the signage and street presence of these office entrances.
- Reposition the existing dated office provision to be attractive to current market trends and tenants.
- Update the servicing strategy for the buildings to meet modern requirements and sustainability targets.

As part of the sustainability drive of the Development, BREEAM 2014 ‘Excellent’ will be pursued. A BREEAM Pre-Assessment tracker has been developed and will be submitted as part of the planning application to fully demonstrate how this will be achieved. This tracker will be updated throughout the design and construction phase in order to ensure that the high aspirations are maintained throughout all stages of the project.

Figure 2: Proposed Computer Generated Image, Sicilian Avenue – Southampton Row Retail Corner

3. 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. This provides a detailed understanding of the guiding sustainability policy framework relevant to the Site and the Development proposals. A desk-based review of relevant national, regional and local planning policy has therefore been undertaken.

3.1 National Planning Policy Framework (NPPF)

The National Planning Policy Framework (NPPF) was last 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.

3.2 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

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

The framework within the SPG (2014) outlines both '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.

3.4 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

3.5 Energy Efficiency and Adaptation (2021)

This guidance 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

4. 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

4.1 Design and Amenity (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**

*"*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**

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	

4.1.1 Design

In line with the overall high sustainability aims of the proposed development, the development will meet BREEAM 'Excellent' rating (Ref. 4). 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
- 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 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
- Permeable 'hard' surfacing within landscape
- Incorporation of Bat, Bird and Bee habitats
- No car parking spaces
- Significant increase in cycle provision, including shower and changing facilities

The development looks to provide upgraded office spaces through internal alternation works, a small extension to Vernon House at the existing 5th floor, together with new plant equipment, cycle parking spaces and other associated works. At ground floor, the development looks to provide an improved office entrance experience from the street to the office demises of Vernon - Sicilian House & 21 Southampton Row, as well as reposition the existing retail units to current market requirements, while retailing the existing frontages.

4.1.2 Location

All the buildings are Grade II listed and are located within the Bloomsbury Conversation Area. To the north of the site is Bloomsbury Square Gardens, London's oldest square, laid out in 1665. The northern corner of the site is visible from the gardens.

Built between 1906-1910, Sicilian Avenue and Vernon & Sicilian Houses were designed as a pedestrianised shopping street of individual small retail units at ground and basement with flats above. However, in subsequent years, the flats were converted into office spaces with the removal of all the chimney stacks and fireplaces.

Whilst the retail units were originally designed as individual units between 12-14 foot wide, many have been combined over the years, with openings through the separation walls to create units in line with current market demands.

Most noticeably today, the remaining structural partitions have meant it has been challenging to retain or attract new tenants to these units. Only two retail tenants remain across the northern and southern sides of Sicilian Square, although one of whom have recently given their notice to vacant.

4.2 Energy (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 Mitigating Climate Change**

"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**

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 Assessment produced by Waterman Building Services (Ref. 5) for the Proposed Development 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.

4.2.1 Be Lean

"Be Lean" measures refer to passive design and energy efficient solutions. The Proposed Development 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 baseline and proposed U-values can be found in Table 4.

Table 4: Model Construction Data

Element		Existing Spec.	Proposed Spec.
Floor U-Value (W/m^{2}K)		0.25 (GLA Guide Notional Figure)	1.20 (as per original spec)
Roof U-Value (W/m^{2}K)		0.18 (GLA Guide Notional Figure)	0.18
Exposed Walls U-Value (W/m^{2}K)		0.55 (GLA Guide Notional Figure)	2.10 (as per original spec)
Windows	U-Value (W/m^{2}K)	1.8 (GLA Guide Notional Figure)	5.75 (retained) 1.80 (new)
	G-Value	0.40 (GLA Guide Notional Figure)	0.70 (retained) 0.40 (new)
Air Permeability (m^3/hm^2 @50Pa)		25	25

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 passive and active design measures that have been implemented:

- 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 upgrading glazing with improved g-values to reduce solar gains. Secondary glazing will be introduced to the building frontage on floors 1-6 and glazing to the rear of the ground floor areas will be replaced and improved.
- A conservative low thermal mass was used within the simulation model as a worst-case scenario
- Mechanical Ventilation will be provided with heat recovery.
- 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 approximately 24% lower than that of the notional building.

4.2.2 Be Clean

Any existing or proposed district heating schemes in the vicinity of the Development should be considered for connection.

If there are no district heating schemes in the vicinity, a viability study into the use of Combined Heat and Power (CHP) should be undertaken.

The London Heat Map indicates that the closest existing district heating network is located approximately 1,200m^2 from the Site. The space heating strategy comprises an Air Source Heat Pump system, therefore, no allowance for connectivity to future district heating networks has been made.

Planning applicants are encouraged to use the SAP 10 carbon emission factors, which demonstrate that generating on-site electricity through systems, such as gas-engine CHP, will not achieve the carbon savings provided in the past. Therefore, the use of CHP has not been considered for this development.

4.2.3 Be Green

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

- Ground Source Cooling
- Air Source Heat Pump
- Biomass Boilers
- Wind Turbines
- Photovoltaic Panels.

Of the above, Air Source Heat Pumps and Photovoltaic (PV) Panels have been found to be viable options due to the significant reduction in running costs and carbon emissions. All other options have been discounted against inclusion within the design due to visual impact, unsuitability of site, and air quality impact. Approximately 80m^2 of the roof space can be accommodated for PV use. This equates to an installed capacity of ~16kWp and a yearly electrical generation of approximately 10,400kWh.

When accounting for all energy efficiency measures, it is estimated that the refurbished office will reduce CO_2 emissions by approximately 31%, when compared against the pre-refurbished office.

4.3 Water (CC3)

"We will require development to incorporate water efficiency measures." **– Policy CC3 Water and Flooding**

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 (Ref. 4), 3 credits out of a possible 5 have been targeted for Wat01: Water Consumption. This corresponds to a 40% improvement over the baseline.

A water meter will be supplied on the mains water supply to each of the buildings. This will ensure that water consumption can be monitored and managed and therefore encourage reductions. A water leak detection system which is capable of detecting a major water leak on the mains water supply within the building will be specified.

4.4 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**

"Ensure that development does not increase flood risk and reduces the risk of flooding where possible." **– Policy CC3 Water and Flooding**

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	

The London Flood Map[1] confirms that the Site is located in Flood Zone 1, denoting a low risk of flooding from rivers and the sea.

[1] Flood risk information for this location - Flood map for planning - GOV.UK (flood-map-for-planning.service.gov.uk)

4.5 Nature Conservation and Biodiversity (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**

"The Council will protect and enhance sites of nature conservation and biodiversity… and seek to secure additional, trees and vegetation" – **Policy A3 Biodiversity**

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	

The Ecology Assessment (Ref. 6) assesses the various ecological aspects of the scheme in accordance with BREEAM criteria. It concludes that the existing ecological features should be protected from substantial damage during the building works.

It is recommended that a Suitably Qualified Ecologist (SQE) is appointed to provide ecology advice on methods of enhancement of Site ecology at the appropriate RIBA Stage based on a site survey. These methods should be implemented where possible at RIBA Stages 2 and 4 of the development. The SQE will also confirm compliance with all relevant UK and EU legislation, including production of a Landscape and Habitat Management Plan that covers at least the first 5 years after project completion.

4.6 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**

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

Objectives, requirements and targets
• Incorporate best practice in resource management and climate change adaptation and mitigation • Materials should be high quality and complement the local character

The principles of circular economy will also be considered, and employed as thoroughly as possible throughout the design, including:

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:

- Cement replacement within concrete elements where relevant and practical
- A minimum of 90% recycled content of steel reinforcing bars
- A minimum of 60% 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
- Salvaging demolition materials for re-use
- Sourcing locally and sustainably, where possible
- Implementing protective measures where required, such as kickplates on doors with high pedestrian use

It should be noted that the material impact has been significantly mitigated through the retention of the majority of the existing building, in particular structural items containing concrete and steel. Concrete and Steel are often perceived to have some of the highest carbon intensities.

4.7 Waste (CC5)

"The Council will seek to make Camden a low waste borough" – **Policy CC5 Waste**

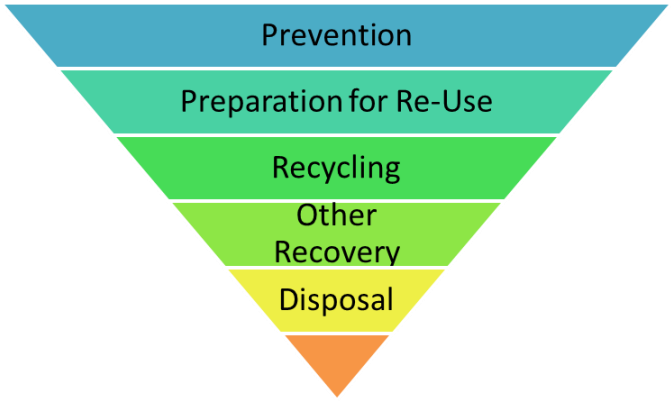
Table 9: Waste

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 the waste produced in the borough and increase recycling and reuse of materials to meet the 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



4.7.1 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.

The boundary of the basement level is not expected to change, therefore significant volumes of excavation, and associated waste, will be avoided.

4.7.2 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-refurbishment audit will be undertaken to maximise the recovery of materials from refurbishment 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.

It should be noted that asbestos has been identified on-site and has subsequently been disposed off in a safe and responsible manner by a suitably qualified asbestos contractor.

4.7.3 Recycling

Where it has been identified that reuse is not possible, the material may still be recycled into a secondary material. Examples may include window frames that have been damaged, 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.

4.7.4 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.

4.8 Sustainable Transport and Accessibility (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**

"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**

Table 10: 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.	

Summary provided below from WebCAT planning tool - Transport for London (tfl.gov.uk):

Public Transport Accessibility Levels (PTALs) provide a guide to the relative accessibility of a site. PTAL scores range from 1 to 6b, where 6b is the highest score and 1 is the lowest. The Transport for London PTAL calculator indicates a PTAL of 6b, the highest possible score across the entirety of the Site.

The nearest tube station to the site is Holborn, located approximately 250 metres away, served by the Central Line and the Piccadilly Line. Tottenham Court Road tube station is located approximately 720m from the Site and Chancery Lane tube station is approximately 815m from the Site.

Within a 10 minute walk from the Site, 25 different bus routes can be accessed, providing transport links across London.

In addition to the transport links currently serving the proposed development, a new end of journey facility will be erected, comprising bike storage, showers, and changing facilities to incentivise sustainable travel.

Note that a Transport Statement has not been produced in support of the application, on the basis that the proposals are for the refurbishment of an existing commercial building where no change of use and no material increase in floorspace will arise.

4.9 Pollution and Nuisance (A1, A4, CC4)

"The Council will seek to protect the quality of life of occupiers and neighbours." – **Policy A1 Managing the Impact of Development**

"The Council will seek to ensure that noise and vibration is controlled and managed." – **Policy A4 Noise and Vibration**

"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**

Table 11: 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.	

4.9.1 Air Quality

An Air Quality Assessment has been undertaken by Waterman (Ref. 7) to consider the potential air quality impacts resulting from the demolition, construction and operation of the Proposed Development upon existing sensitive receptors as well as the suitability of the Application Site for the introduction of new sensitive receptors.

The main likely effects on local air quality during construction relate to the generation of dust and particulates. A range of measures to minimise or prevent dust and particulates would be implemented throughout the construction works. Therefore, it is considered that likely residual effects due to dust emissions would not be significant.

It is anticipated the effect of construction vehicles on air quality would not be significant in the context of existing local road traffic emissions.

The Development is car-free and would not result in a change in Annual Average Daily Traffic (AADT) of more than 100 light duty vehicle flows or 25 heavy duty vehicle flows within or adjacent to an AQMA. The change in vehicle trips would therefore be below the Environmental Protection UK and Institute of Air Quality Management (EPUK/IAQM) guidance criteria for Developments within an AQMA. In addition, the Development would not include a centralised combustion plant, and therefore would not give rise to any significant adverse air quality impacts.

Based on the low trip generation and absence of a centralised combustion plant, according to the EPUK/ IAQM guidance, the Development is not expected to give rise to air quality impacts. As such the likely effect of the operational Development on local air quality would not be significant.

A review of the local monitoring data, and Defra background maps, indicate future concentrations for future users of the Development would not be significant.

4.9.2 Contaminated Land

A contaminated land assessment is not required for this development due to the refurbishment works.

4.9.3 Noise

A Noise and Vibration Assessment has been undertaken by Waterman (Ref. 8) to quantify the existing ambient and background noise levels at the site to establish any necessary design constraints on noise emissions.

Baseline noise levels were established at and in the vicinity of the Site via noise survey data gathered during noise surveys conducted by Waterman IE in July 2016; these noise data have been validated via comparison with national noise mapping in the area.

To minimise the potential noise impacts of the proposed development, noise limits for any new items of fixed external building services plant have been set at the nearest potentially sensitive receptors based on the modal background noise levels established during the noise survey. The limits were set at 5 dB below the prevailing background noise level; this threshold has been based on the guidance provided in BS 4142:2014+A1:2019 and is therefore in line with the noise assessment guidelines within Chapter 6 of the London Borough of Camden's Supplementary Planning Guidance Document – Amenity.

Overall, it is considered that with suitable noise mitigation measures in place to control the noise emissions of the proposed fixed mechanical plant items, the noise impacts of the development proposals would be negligible. A full assessment of the potential noise impacts of the proposed building services plant should be carried out by a suitably qualified acoustician once selections have been finalised.

4.9.4 Light Pollution

External lighting will be designed in line with BREEAM 2014 Pol 04 criteria to ensure that upward lighting is minimised, reducing unnecessary light pollution, energy consumption, and nuisance to neighbouring properties.

4.10 Heritage (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**

Table 12: 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 has been produced by Iceni Heritage (Ref. 9) and sets out the relevant legislative and policy framework within which to understand the proposed redevelopment of the Site, as well as:

- Provides a proportionate and robust analysis of the Site and surrounding area's historic development
- Describes the site and identify relevant designated heritage assets
- Appraises the heritage significance of the Site and identifies its contribution to the Bloomsbury Conservation Area
- Provides a detailed assessment of impact for the proposals on the Site and its setting, and on the character and appearance of the Conservation Area.

The assessment has considered the historic development of the Site and the surrounding area to demonstrate and inform an assessment of significance of the asset. Site visits have been undertaken, to identify the special interest of the listed buildings and an assessment of the proposals has been made.

The proposals have built upon heritage specific guidance to ensure the significance of the heritage assets is preserved.

As a result of the proposals, it is considered that the special interest of the buildings will be preserved, with a number of works resulting in an enhancement. The intrinsic architectural and historic values associated within the building being maintained. Furthermore, the buildings will continue to positively contribute to the character and appearance of the Bloomsbury Conservation Area.

Overall, therefore, the proposals are considered to be in alignment with the London Borough of Camden's policies on listed buildings and in alignment with the requirements of the NPPF Chapter 16

5. Conclusion

This report demonstrates the Applicant's commitment to delivering a sensitive and sustainable restoration of a tired and inefficient mix of Grade II listed office and retail buildings to support the implementation of the London Borough of Camden's Local Plan. The proposals will enhance, activate, and enliven the existing Grade II listed buildings that will deliver high quality commercial floorspace that will attract businesses and create new employment opportunities, whilst securing the Site's viable long term sustainable future. In order to adapt to the future projected climate, efforts have been made to optimise the thermal efficiency against resulting embodied carbon whilst ensuring maximum flexibility of use through structural specifications and internal floor layouts.

To ensure the successful delivery of a 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 subsequent operational phase of the Development.

The 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
- Fully electrified building in preparation for the decarbonisation of the national grid
- Heat Pumps with high efficiencies for heating and cooling will be used to minimise energy consumption
- Approximately 80m^2 of the roof space can be accommodated for PV use. This equates to an installed capacity of ~16kWp and a yearly electrical generation of approximately 10,400kWh.
- Significant retention of the existing buildings minimises embodied carbon of the development including reduction in waste.
- 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.
- Low flood risk from rivers and seas
- Appointment of a Suitably Qualified Ecologist to ensure compliance with UK and EU legislation and enhance biodiversity on site.
- 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.
- Confirmed to be a car-free development, with provision of a new end of journey facility comprising bike storage, showers, and changing facilities
- Significant effort to preserve and minimise disruption to historical elements of the building during construction

In addition to the above, it is proposed that the development will achieve a BREEAM Rating of 'Excellent'.

6. 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 Hale Brown (2022) Design and Access Statement

Ref. 4 Waterman (2022) BREEAM Office Non-Domestic Refurbishment 2014 Pre-Assessment

Ref. 5 Waterman (2021) Energy Statement

Ref. 6 Waterman (2022) BREEAM 2014 Refurbishment and Fit-Out: Ecology Assessment

Ref. 7 Waterman (2022) Air Quality Assessment

Ref. 8 Waterman (2022) Noise and Vibration Assessment

Ref. 9 Iceni Heritage (2022) Heritage Statement

UK and Ireland Office Locations