



Sustainability Statement

Big Yellow Self Storage, Alpha House, 24-27 Regis
Road, Kentish Town.

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Report produced by –

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1 Blewburton Limited

Blewburton Limited (BBL) was established in April 2016 and are the follow-on company to The Blewburton Partnership (BBP) which was established in 2008 to provide energy and sustainability consultancy to clients in both the private and public sectors. Staffing has since increased and all employees have been involved in the project management, assessment and consulting on projects involving renewable and sustainable energy for over twenty years, both with BBL, BBP and in former employment.

BBL is well placed to analyse and assess the potential for low and zero carbon energy technologies to contribute towards the energy mix and the offset of carbon emissions associated with new developments. We can help to determine the most cost effective and technically appropriate means of meeting the sustainable energy requirements relating to planning conditions and policies in whichever format the Local Planning Authority requires as part of their general policy.

BBL are also licensed Elmhurst SAP, BREEAM, HQM & Code for Sustainable Homes assessors.

2 Introduction

2.1 Background

Blewburton Limited has been commissioned by Big Yellow Self Storage Company Limited ('Big Yellow') to prepare a Sustainability Statement to demonstrate compliance with current London Borough of Camden and the London Plan policies to accompany a full planning application for the redevelopment of Alpha House, 24-27 Regis Road, Kentish Town.

2.2 The site

Big Yellow proposes to redevelop the site and construct a self-storage facility (Use Class B8) and flexible office space (Use Class E(g)(i)), together with vehicle and cycle parking and landscaping.

The proposal is for a 5-storey building with an internal floor area of 9,563m². Full details of the proposals can be found with the Design and Access Statement prepared by Mountford Pigott.

The site is situated in a largely industrial/commercial area in Kentish Town, with student residential properties opposite in close proximity and a railway track near to the rear boundary.

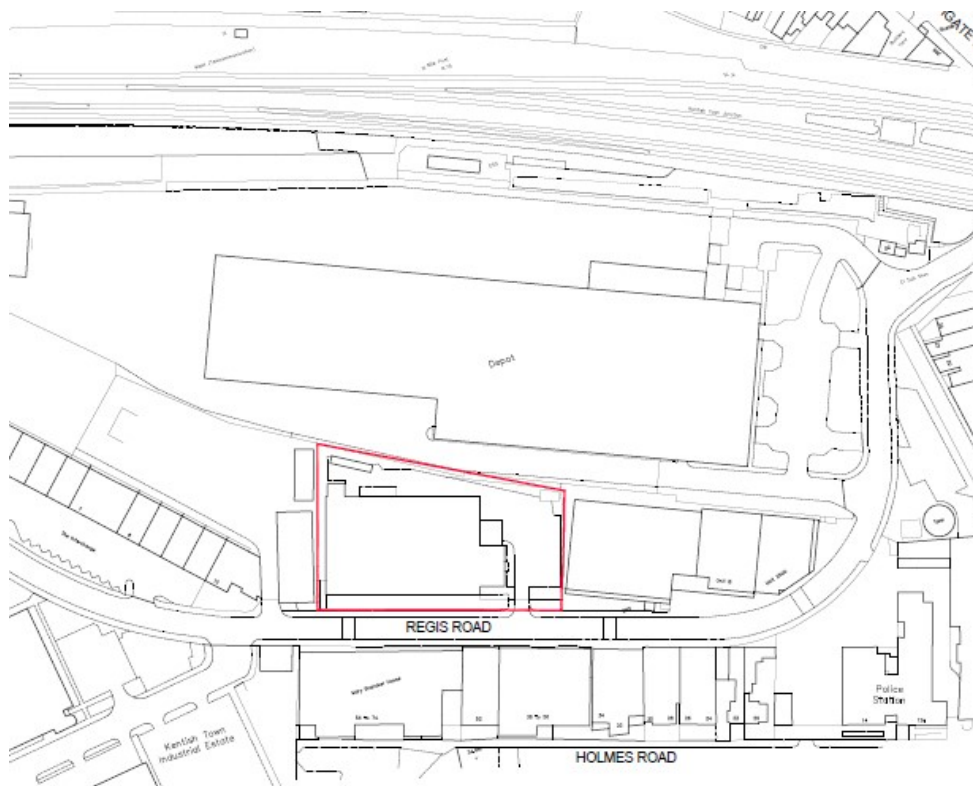


Figure 1 – Existing site plan

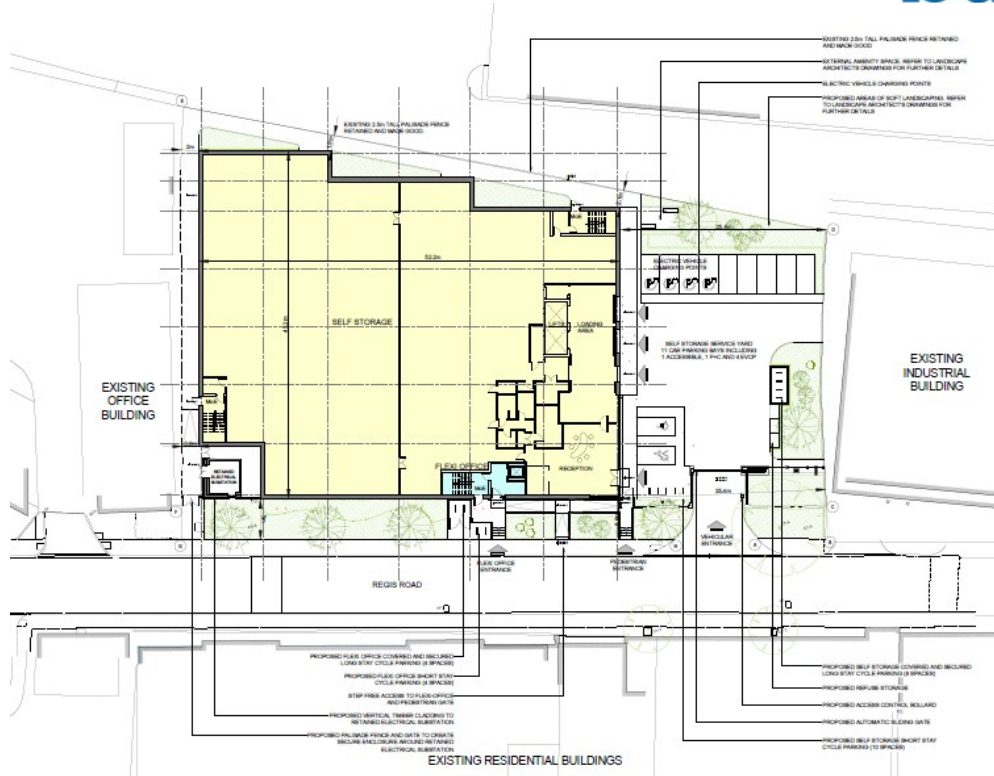


Figure 2 – Proposed site plan

3 Policy

The Statement, and targets within it, comply with National and Local policy requirements, in particular the London Plan (2021) and Camden's Local Plan (2017).

3.1 Regional Policy

The London Plan (Mar 2021)

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 deals with things of strategic importance to Greater London taking into account the principal purpose of the Greater London Authority which are:

- promoting economic development and wealth creation
- promoting social development
- promoting the improvement of the environment

In developing the spatial development strategy regard has been given to:

- the principle that there should be equality of opportunity for all people
- reducing health inequality and promoting Londoners' health
- achieving sustainable development in the United Kingdom
- climate change and the consequences of climate change

The key policies relevant to the proposed development have been documented in the Sustainability Outline below.

3.2 Local Policy

Camden Local Plan (2017)

The Camden Local Plan includes policies relating to sustainability in the following areas:

- Policy CC1 Climate change mitigation
- Policy CC2 Adapting to climate change
- Policy CC3 Water and flooding
- Policy CC4 Air quality
- Policy CC5 Waste
- Policy A3 Biodiversity
- Policy T1 Prioritising walking, cycling and public transport
- Policy T2 Parking and car-free development

This report aims to determine how the development can meet the local planning authority's sustainability requirements, and outline the sustainability benefits of the development. This study will enable the design team to influence the development moving forward to enhance sustainability.

4 BREEAM

A BREEAM pre-assessment has been carried out and the development will be targeting a BREEAM Excellent rating as required by Camden Local Plan Policy CC2. It is proposed that the whole development will be assessed as fully fitted under BREEAM Industrial New Construction 2018, which is the current version of BREEAM.

BREEAM is an environmental performance standard against which buildings can be assessed and compared. The building is assessed against a range of criteria falling into the following categories:

- Management
- Health & Wellbeing
- Energy
- Transport
- Water
- Materials
- Waste
- Land Use & Energy
- Pollution
- Innovation

Each criterion within these sections has requirements which when met allows credits to be awarded.

All BREEAM certified buildings are going above and beyond Building Regulations, therefore even a Pass rating is an achievement and improves the sustainability of a building.

The BREEAM ratings broadly represent performance equivalent to:

- Outstanding: less than 1% of new non-domestic buildings in the UK (innovator)
- Excellent: Top 10% of new non-domestic buildings in the UK (best practice)
- Very Good: Top 25% of new non-domestic buildings in the UK (advanced good practice)
- Good: Top 50% of new non-domestic buildings in the UK (intermediate good practice)
- Pass: Top 75% of new non-domestic buildings in the UK (standard good practice)

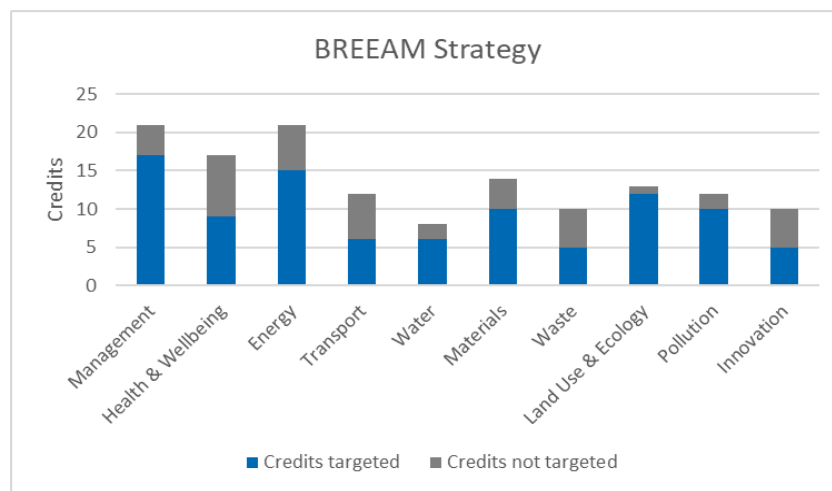


Figure 3 – BREEAM Score Summary

Full details of the proposed BREEAM strategy can be found in the BREEAM pre-assessment.

5 Energy

Policy SI 2 of the London Plan and CC1 of the Camden Local Plan require new developments to be designed and constructed to maximise energy efficiency and the use of low carbon energy. As a major development a 35% on site reduction in emissions should be achieved, 15% of this should be through energy efficiency measures. In addition, a carbon offset payment will be required to meet zero carbon.

5.1 Regulated emissions

An energy strategy has been produced by Silcock Dawson. The development will adopt a fabric first approach, improving on all Part L2A limiting factors.

A 35% reduction in emissions will be achieved at the Be Lean stage through energy efficiency improvements. With the inclusion of individual air source heat pumps and solar PV arrays a further 114% reduction will be achieved. Overall, the building will be zero carbon, saving 150%.

Further details of the proposed building fabric and services can be found in the energy strategy.

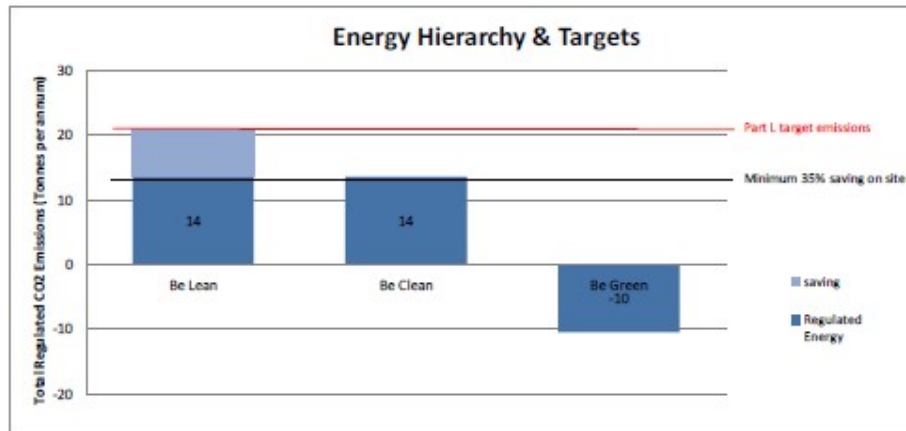


Figure 4 – Emissions

5.2 Unregulated energy use

Occupiers will be given Building User Guides which will include an overview of the building and its environmental strategy. This will also include details of how their heating and hot water systems are operated. The Building User Guide is mandatory for achieving a BREEAM rating of Very Good or above.

The building will have sub meters, as required by BREEAM Ene02, to allow occupiers to monitor their energy use, helping them to make reductions.

5.3 Construction energy use

The team are committed to monitoring energy use on site and associated with the transport of materials to site and waste from site during construction. Monitoring will meet the requirements of BREEAM Man03. Targets will be set and consumption will be monitored and recorded against these targets.

6 Flood risk and surface water

6.1 Flood risk assessment

Campbell Reith have assessed the flood risk for the site and have found the site is within Flood Zone 1. There is a low risk of flooding from fluvial, tidal, groundwater, sewer, surface water and artificial sources.

The site is neither at risk, nor does it increase flood risk on or off the site.

A drainage strategy and maintenance statement has been prepared to mitigate against surface water flooding.

6.2 Sustainable urban drainage systems

Campbell Reith have provided a drainage strategy and maintenance statement for the development. A number of potential options have been considered, in line with the drainage hierarchy, including:

- Underground attenuation tanks
- Permeable paving
- Rain gardens
- Filter drains
- Proprietary treatment systems
- Hydrobrake flow control

Attenuation will be provided in the form of a cellular below ground storage tank beneath the service yard. A flow control device will be fitted to limit discharge to 2l/s.

Permeable paving and filter drains will be used to treat the service yard runoff which has a pollution hazard level of medium. All flow will finally be treated using a hydrodynamic vortex separator.

The proposed surface water management solutions will comply with the BREEAM Po03 criteria and Camden Local Plan Policies CC2 and CC3.

7 Materials

7.1 Environmental impact of materials

The selected materials will be responsibly sourced where possible, durable and fit for purpose. Suppliers will be asked to present their Environmental Product Declarations and responsible sourcing certificates. All timber and timber-based products will be legal and sustainable. Certificates such as FSC or PEFC for timber-based products and BES6001 or ISO14001 for all other materials will be requested from suppliers. All insulation materials selected for this development will have a Global Warming Potential of below 5 in order to minimise the impact on climate change.

As far as possible, all materials will be sourced from local suppliers to reduce transportation and its associated carbon emissions and to support the local economy.

7.2 Circular economy

A circular economy statement has been produced by Silcock Dawson as required by London Plan Policy SI 7.

The report summarises the proposed approach and actions taken, proposed measures, monitoring and reporting. Design decisions have been made to encourage longevity, durability, flexibility and adaptability. End of life has also been considered to ensure the development can be repurposed.

7.3 Durability

The selection of materials will include an assessment of their durability in line with their proposed level of use and exposure, with a particular focus on materials that are well adapted to handling climatic variations, long lasting, robust and low maintenance. This is covered in the circular economy statement. This will meet the BREEAM requirements for Mat05 and Camden Local Plan Policy D1 d.

7.4 Toxic materials

Materials with low levels of VOC's (volatile organic compounds), formaldehyde and carcinogens will be selected where possible. This will improve the internal environment for occupants as internal air pollution is increasingly recognised as having negative impacts on health.

8 Waste

8.1 Construction Waste

A detailed Site Waste Management Plan (SWMP) will be developed by the contractor prior to work starting on site. This SWMP will set targets and procedures for the sorting, reusing and recycling of construction waste into defined waste groups, either on site or through a licensed contractor. This plan will then be updated and monitored throughout the construction process, with any lessons fed back to all relevant parties at the end of the process.

The plan will follow the 'waste hierarchy', which ranks the different ways in which waste can be treated so that it limits the amount of resources used and waste generated. The aim is to maximise the (re)use of existing resources and materials and minimise waste generated during the demolition and construction process through the implementation the following waste hierarchy:

- Reduce;
- Reuse (prioritise on-site reuse of demolition materials, followed by off-site reuse);
- Recycle (prioritise on-site recycling, then off-site recycling);
- Resource recovery (for energy generation processes – fuels, heat and power); and
- Disposal.

8.2 Operational waste

With regards to waste generation from the completed scheme, facilities for waste and recyclables storage consistent with the Local Authority waste collection schemes will be provided for staff on site. Customers are told there are no waste facilities at the store and they are encouraged to take their waste away with them.

The external bin store will be located in the service yard and bins will be labelled and locked inside a secure store, meeting the requirements of BREEAM Wst03 and Camden Local Plan Policy CC5 d.

9 Flexibility and adaptation

The proposed design offers flexible accommodation in a wide range of unit sizes for both storage and offices.

A number of mezzanine level demountable floors have been proposed, allowing for taller spaces should they be needed.

Given the large open nature of the space it has the potential to be adapted in the future to a wide range of other uses.

Where practical the team will ensure the construction methods and materials used allow for reuse of materials at the end of the building's life.

This is covered in the circular economy statement.

The development will meet the BREEAM Wst06 requirements for designing for disassembly and adaptability, and Camden Local Plan Policy D1d.

10 Biodiversity

A preliminary ecological appraisal has been completed by RPS, this is based on a desk study, Phase 1 habitat survey and an ecological scoping survey. The report makes a number of recommendations, including:

- Nesting birds – vegetation and building demolition/work should be undertaken outside the bird nesting season
- Biodiversity net gain assessment
- Urban greening factor assessment
- Native planting
- Night scented flowering plants
- Hibernacula's
- Bird boxes
- Bat boxes
- Escape routes for hedgehogs

The report found there were not protected or notable plant species, no suitable habitat for amphibians or reptiles and no suitable locations for roosting or commuting bats.

The site itself is of low ecological value and there are no nearby designated sites that would be impacted by the work.

Camden's Local Plan Policy A3 and BREEAM requirements LE02-05 will be met.

11 Overheating

The developments risk of overheating has been assessed using dynamic thermal modelling. The following features have been incorporated to reduce the risk of overheating to the flexible office units:

- Shallow floor depths
- Windows sized to optimise daylight and solar gain
- External shading to reduce solar gain
- Manual night time ventilation will be encouraged
- Increased thermal mass through the use of high density fibreboard panels

The energy strategy includes the TM52 results which shows under design summer year 1 all flexi offices are compliant.

The development will be compliant with the first part of BREEAM Hea04, Camden Local Plan Policy CC2 and the London Plan Policy SI 4.

12 Transport

A transport statement and draft travel plan have been produced by Rappor. It has been determined that the development will have a negligible transport impact and is compliant with current planning policies. A travel plan coordinator will be appointed. Further details can be found within the transport reports.

12.1 Public transport

The site is located within 350m of a railway station, underground station and bus stops. There is also an overground station 1.1km from the site. The site has a PTAL score of 4, which is considered to have a greater than average level of public transport accessibility.

12.2 Local amenities

There are a range of local amenities within 675m of the site. These include retail, ATMs, a medical centre, a pharmacy and a post office. More details can be found within the draft residential travel plan.

12.3 Walking

The travel plan shows that the benefits of walking will be promoted to staff. This will include provision of information regarding local walking routes in welcome packs and on notice boards. The routes will be checked to ensure they are properly maintained. This will be compliant with Camden Local Plan Policy T1.

12.4 Cycle storage

The travel plan shows that the benefits of cycling will be promoted to staff. This will include provision of information regarding local cycle routes in welcome packs and on notice boards. The routes will be checked to ensure they are properly maintained.

Participation in national and local cycling events and cycle training will be explored.

Storage for 8 cycles will be provided in the service yard, and a further 4 by the entrance to the flexi office. These spaces will be covered and secure. There will be an additional 4 short stay spaces by the flexi office entrance. This will be compliant with Camden Local Plan Policy T1.

12.5 Car parking

Car parking on site will be for customers only, as there is an operational need for customer parking this complies with Camden Local Plan policy T2 b. No BYSS employees or flex-office tenants will be permitted to use on-site car parking.

The service yard will have 11 parking spaces, including, 1 parent and child space, 1 accessible space and 4 electric vehicle charging points.

13 Water Efficiency

13.1 Water use

Water is a key resource and has a fundamental part to play in contributing to the economy, ecosystems and overall health of the local population. Climate change has the potential to place further stress on this supply, causing longer periods of drought and reducing river flow which could impact the quality of local rivers.

The actual specifications of the water using products are yet to be established, however, a 40% improvement on baseline will be achieved in line with BREEAM Wat01. Water efficiency measures will be incorporated to comply with Camden Local Plan Policy CC3.

Rainwater or greywater harvesting have not been proposed for the development. Landscaping and planting will be drought resistant removing the need for irrigation.

13.2 Water meters

An accessible water meter will be installed on the mains water supply. The provision of water meters is recognised as an important tool in reducing water usage. In addition, water leak detection and flow control devices will be installed in line with BREEAM Wat03 criteria.

13.3 Construction water use

The team are committed to monitoring water use on site during construction. Targets will be set and consumption will be monitored and recorded against these targets.

14 Comfort

14.1 Daylight

A daylight assessment has not been carried out at this time. All flexi offices have been designed to have windows allowing natural light and views out.

14.2 Ventilation and Humidity

Ventilation will be in accordance with Part F of Building Regulations.

14.3 Smart technologies

The site has access to high-speed broadband which will be available to the Big Yellow offices and flexi-offices.

15 Pollution

15.1 Light Pollution

An external lighting impact report will be carried out, assessing light spillage into the surrounding properties. The lighting design will be amended, based on the findings of this report. The lighting design will be compliant with the relevant BREEAM criteria.

15.2 Noise Pollution

An assessment of the noise impact has been assessed by Sharps Acoustics. This demonstrates compliance with Camden's Local Plan policies A1 and A4.

The report shows there will be no adverse effects and therefore no noise mitigation measures are required. Section 5 of the report shows the proposal will comply with BREEAM Hea05 and Pol05 criteria.

15.3 Air Pollution

An air quality assessment and air quality neutral assessment have been produced by RPS to demonstrate compliance with London Plan Policy SI 1 and Camden Local Plan Policy CC4.

The main concern during demolition and construction will be dust, the report includes mitigation measures.

During operation air pollution concerns are related to the traffic to and from site. The proposed development will generate fewer vehicle movements than the existing site, therefore the effects are considered not significant. The proposed development includes electric heating only, therefore there will be no impact on local air quality from the building itself, this will be compliant with BREEAM Pol02.

16 Construction site management

The construction process can have a detrimental effect on the local environment and community if poorly managed, and, in an effort to mitigate against this, the main contractor will be required to develop a Construction Management Plan. It will be required to include details on how negative impacts associated with, noise, dust, odour, vibration and any other forms of pollution or nuisance will be removed, reduced or mitigated against.

They will also be required to set targets and monitor energy and water use arising from site-based activities as a key step in reducing wastage of these key resources. They will also be required to adopt best practice policies in respect of air and water pollution.

In addition, the team will consider the benefits that may be offered to this site by the main contractor signing up to the Considerate Constructors Scheme (CCS).

All timber and timber-based products used on the project as part of the construction process (shuttering, temporary fencing etc. – not fundamental elements of the final buildings which is covered in Section 5 - Materials) will be from suppliers that can demonstrate that the timber is from legally harvested and traded sources

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