MOUNT PLEASANT ASSOCIATION COMMUNITY RIGHT TO BUILD ORDER

Sustainability and Energy Statement

August 2016

CREATE Streets

Contents

1. Executive Summary

1.1. It is the design intent of the Mount Pleasant proposals to provide a low emission development to achieve or improve on the requirements of building regulations to accord with London Plan requirements the requirements of *London Plan 2016 P*olicy 5.2 target of zero carbon emissions. The development achieves the *London Plan 2015* Policy 5.2 target of 35% carbon dioxide emissions reduction from regulated energy over Part L 2013 emissions, and the remaining emissions are offset as outlined in *London Plan 2016* Policy 5.2E. The cost of offsetting is included in the developer contributions as outlined in the Viability Statement.

1.2. To achieve these targets, the methodology outlined in the National Policy, London Plan and Camden policy has been implemented and incorporated into the designs, and the proposals commit to achieving BREEAM 'Excellent for all non-domestic use.

2. Sustainability and the National Planning Policy Framework

2.1 The National Planning Policy Framework (NPPF) outlines three dimensions to sustainable development: economic, social and environmental. These dimensions give rise to the need for the planning system to perform a number of roles:

2.1.1 *"An economic role – contributing to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure;*

2.1.2 *A social role – supporting strong, vibrant and healthy communities, by providing the supply of housing required to meet the needs of present and future generations; and by creating a high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being; and*

2.1.3 *An environmental role – contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy."*

2.1.4 The MPA's proposals deal with all three of these forms of sustainability. How they do so is set out below

2.2 Economic Sustainability

2.2.1 The NPPF seeks to *"proactively drive and support sustainable economic development to deliver the homes and business units that the country needs by*

encouraging the effective use of previously developed land and by promoting mixed use development." (17)

2.2.2 The Viability Assessment, also submitted as part of the CRTBO is evidence of compliance with the economic role of sustainable development as outlined in the NPPF.

2.2.3 The delivery of 125 units of housing is evidence of compliance with the economic role of sustainable development as outlined in the NPPF

2.2.4 The provision of 1,200m² of commercial space, creating a mixed use development with business units is evidence of compliance with the economic role of sustainable development as outlined in the NPPF.

2.2.5 The provision of cycle parking is evidence of the provision of infrastructure to support this development, which demonstrates compliance with the economic role of sustainable development as outlined in the NPPF

2.3 Social Sustainability

2.3.1 The provision of 125 units of housing, and compliance with Camden's policies on affordable housing, as outlined in the Viability statement, is evidence of compliance with the social role of sustainable development as outlined in the NPPF.

2.3.2 The High quality built environment, as outlined in the Design Statement, Energy & Sustainability Statement and the Heritage Statement, ensures compliance with the social role of sustainable development as outlined in the NPPF.

2.4 Environmental Sustainability

2.4.1 As outlined in this Sustainability and Energy statement, the proposals take all necessary steps and considerations to ensure compliance with enhancing the natural environment, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy. This ensures compliance with the environmental role of sustainable development as outlined in the NPPF

2.4.2 The Ecology Statement Addendum also submitted as part of the CRTBO evidences the beneficial ecological impact of the proposals and compliance with the environmental role of sustainable development as outlined in the NPPF

2.4.3 The Heritage Statement Addendum also submitted as part of the CRTBO evidences the beneficial impact of the proposals on the historic environment of and of compliance with the environmental role of sustainable development as outlined in the NPPF

3. Context

3.1 This Sustainability Statement supports a Community Right to Build Order (CRTBO) submission generated by the Mount Pleasant Neighbourhood Forum for:

3.1.1 Redevelopment of brownfield site currently used as a car park

3.1.2 Provision of 125 1, 2 and 3 bedroom flats and 1,200m² of commercial space in a series of 5 linked buildings ranging from 4 storeys to 8 storeys (+ lower ground).

3.2 This document should be read alongside the other supporting documentation submitted as part of the CRTBO submission.

3.3 This Sustainability Statement has been prepared taking into account National, London, and Camden Guidance as outlined in section 2. It provides an overview of the sustainability merits of the proposed development and the initiatives incorporated into the design to reduce resource consumption and environmental impact.

3.4 The proposed development will take place on a brownfield site. The nature of the proposals (residential and commercial uses) are considered appropriate due to the site location and surroundings.

3.5 The site's location and proposal for residential accommodation is considered very sustainable due to its location within the Central Activities Zone and in close proximity to world-class shopping facilities, local schools and other local facilities and amenities. The site is located in Zone 1 and is well served by public transport. The PTAL for the site is 6b (excellent). It is very well served by existing bus routes. A total of nine bus routes have stops, which are accessible within PTAL walking distance (640m or 8 minute walk) of the site. The nine accessible bus routes surrounding the site provide a viable sustainable travel option to the majority of central London.

3.6 This statement demonstrates how the proposals complies with Camden, London Plan, and national policies.

3.7 Under guidance from a BREEAM Licenced Assessor we have carried out our own indicative BREEAM pre-assessment. This achieves an Indicative BREEAM Rating of Excellent and an Indicative Total Score of 70.54%. Nothing in the proposals precludes the ability of the proposals to achieve BREEAM Excellent. All minimum mandatory performance standards under Key Sustainability issues have been achieved to an Excellent Level. Section 14 outlines the BREEAM criteria that these proposals either currently do, or would be able to, meet.

4. Site Details

4.1 The proposals consist of:

4.1.1 125 1, 2 and 3 bedroom flats in a series of 5 linked buildings ranging from 4 storeys to 8 storeys (+ lower ground).

4.1.2 Approximately 1,200sqm of commercial space;

4.1.3 A newly created communal open space over 900sqm that will be enclosed by the proposed block on three sides;

4.1.4 Communal roof terraces private to the residents and accessible by lift;

4.1.5 Widening of the western end of Mount Pleasant to create a new 'pocket' park adjacent to Christopher Hatton Primary School and with traffic calming measures along the section of road fronting the development site

4.1.6 Parking, related to relevant accommodation, for disabled drivers to be located on Gough Street and Phoenix Place for residents and Mount Pleasant for visitors;

4.1.7 A minimum of 125 secure cycle parking spaces at lower ground floor level for use by residents.

4.2 Full details and further comment relating to the scale, design and massing of the proposed development is set out in the accompanying Design Statement also submitted as part of the CRTBO.

4.3 The site location is outlined in the map below:

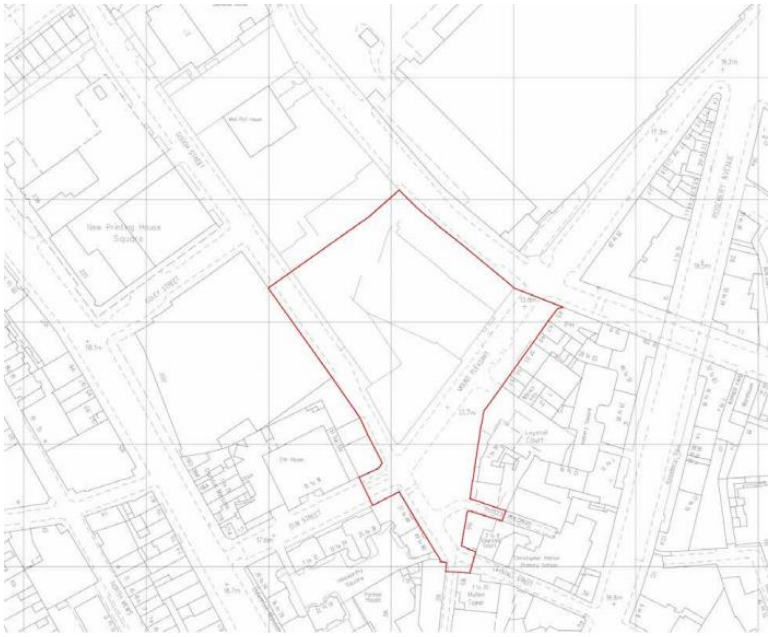


Fig i – site location

5. Planning Policy

5.1 This report has been produced in line with Camden's Core Strategy 13 and Chapter 2 of Camden's Planning Guidance 3.

5.2 Chapters 2-6 of Camden Planning Guidance 3 states that Sustainability developments involving 5 or more dwellings and/or 500sqm (gross internal) or more are required to submit an energy statement which demonstrates how carbon dioxide emissions will be reduced in line with the energy hierarchy.

5.3 This sustainability statement demonstrates how the MPA's proposals mitigate against the causes of climate change and adapts to the effects of climate change in line with policies contained in Camden's Core Strategy CS13 Tackling climate change through promoting higher environmental standards

5.4 This statement takes into consideration the 'GLA guidance on preparing energy assessments'[1] document – this gives a clear recommended layout and information required for energy statements.

5.5 This statement takes into account the joint Camden and Islington Mount Pleasant Supplementary Planning Document (February 2012), particularly sections 4.2.34-4.3.3 (Sustainability).

5.6 This statement evidences how the proposals adhere to Sustainable design principles as contained in Development Policies document DP22 Sustainable design and construction (p.104)

5.7 This statement outlines how the proposals adhere to London Plan 2016 policy 5.2 which states that major developments states that from 2016 new dwellings should be zero carbon,(5.2B) and where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere (5.2E). It also takes into consideration Policy 5.3 (Sustainable Design and Construction) and the London Plan Sustainable Design and Construction SPG (including all minimum standards for major development).

5.8 London Plan Policy 5.2 states that from 2016 new dwellings should be zero carbon, stating:

"The Mayor will work with boroughs and developers to ensure that major developments meet the following targets for carbon dioxide emissions reduction

[1] https://www.london.gov.uk/file/22340/download?token=En8l3jJy

in buildings. These targets are expressed as minimum improvements over the Target Emission Rate (TER) outlined in the national Building Regulations leading to zero carbon residential buildings from 2016 and zero carbon non-domestic buildings from 2019." (5.2B)

5.9 London Plan policy contains the provision is for cash in lieu payments:

The carbon dioxide reduction targets should be met on-site. Where it is clearly demonstrated that the specific targets cannot be fully achieved on-site, any shortfall may be provided off-site or through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere (5.2E)

5.10 The difference between meeting Part L of the building regulations, and meeting zero carbon rating is offset at £60 per tonne for a 30-year period. This equates to £1,000 per apartment unit. Every unit in the development is an apartment. There are 125 units. This equates to £125,000 for the CRTBO as a whole. This amount has been factored into the developer contributions as outlined in the viability statement. This means that the proposals are compliant with London Plan Policy 5.2.

6. Energy Use

6.1 This report demonstrates how the development proposals make the fullest contribution to minimising carbon dioxide emissions in accordance with Camden's energy hierarchy

6.2 The three steps of the energy hierarchy are outlined below

6.3 Camden's policies state that all developments are expected to reduce their carbon dioxide emissions by following the steps in the energy hierarchy to reduce energy consumption.

6.4 To promote energy efficiency and the increased awareness of residents on the amount of energy they use in the home. The possible application of energy monitoring devices shall be considered. Occupants could measure their energy usage and have the potential to lower the amount of energy consumption by everyone in the home and therefore has real long term ongoing CO_2 reductions for the development.

7. Energy Demands

7.1 In accordance with the London Plan the energy demands and carbon dioxide emissions for the residential units will be estimated in compliance with the current building regulations and in particular the requirement of Part L of the 2013 Building Regulations using Standard Assessment Procedure 2012.

7.2 Indicative SBEM modelling will be completed for the non-domestic elements of the scheme and has been assessed against the latest Building Regulations Part L 2013 targets.

7.3 The residential dwellings carbon dioxide emission estimates will be based on 'indicative building services specification and site layout'. The Mount Pleasant Neighbourhood Forum commits to reviewing the initial baseline load for the development as laid down in the London Renewable Toolkit and will demonstrates the potential energy and CO_2 savings from the initial proposed enhancements to the scheme including the following areas:

7.3.1 Part L1A 2013 Baseline Emissions

7.3.2 Non – Domestic Baseline

7.3.3 Combined Development Baseline

8. Combined Heat and Power System (CHP)

8.1 Under the London Plan 2011 policies 5.5 and 5.6 and Camden Sustainability Checklist, a CHP has been considered for the development.

8.2 These policies are as follows:

8.3 London Plan Policy 5.5 (d) requires developers to prioritise connection to existing or planned decentralised energy networks where possible.

8.4 London Plan Policy 5.6 states that:

8.4.1 Development proposals should evaluate the feasibility of a Combined Heat and Power system, and where a new CHP system is appropriate also examine opportunities to extend the system beyond the site boundary to adjacent sites.

8.4.2 Major development proposals should select energy systems in accordance with the following hierarchy:

- Connection to existing heating or cooling networks
- Site wide CHP network
- Communal heating and cooling

8.5 The development is proposed to be supplied with heating and hot water via a decentralized heating network. A Combined Heating and Power (CHP) plant will primarily power the energy centre with associated back up communal gas condensing boilers to provide all the heating and hot water. The suitability of a CHP is totally dependent on the heat density of the site. In this CRTBO there are 125 units proposed, which leads to a very small CHP. The SAP assessments that are committed to will ultimately determine what size of CHP is needed, but it is anticipated that the 35% reduction will be easily achieved or improved on.

8.6 All plants will be located in the allocated energy centre for the development with buried twin insulated pipes linking all buildings/uses.

8.7 The initial strategy, as required by GLA, is for a single CHP unit to be installed.

8.8 To allow the CHP to operate continuously the continuous operation of the CHP the system will be designed to work with large central thermal stores. This will allow the plant to be operated at its most efficient and effective, which will minimise running time and add to the substantial reductions in CO_2 for the development.

8.9 The CHP is proposed to be a 90kw Thermal CHP Plant.

9. London Heat Map

9.1 In line with the requirements of the London Plan mentioned above, the feasibility of connecting into an existing or planned local district heating network has been considered. The London Heat Map (www.londonheatmap.org.uk) shows that there is no existing heating network within practical reach of the development.

9.2 However due to current and future development planned in the area, and London's commitment to delivering 25% of London's energy supply by decentralised energy

(DE) by 2025, an additional boundary connection will be allowed for in the design and construction for future potential links with other heat networks. The proposals will leave space within the energy centre for a heat exchanger which could receive district heating at some point in the future should it become available.

9.3 At this stage it will therefore be considered that a heating network and plant will be located on site to serve all of the buildings/uses.

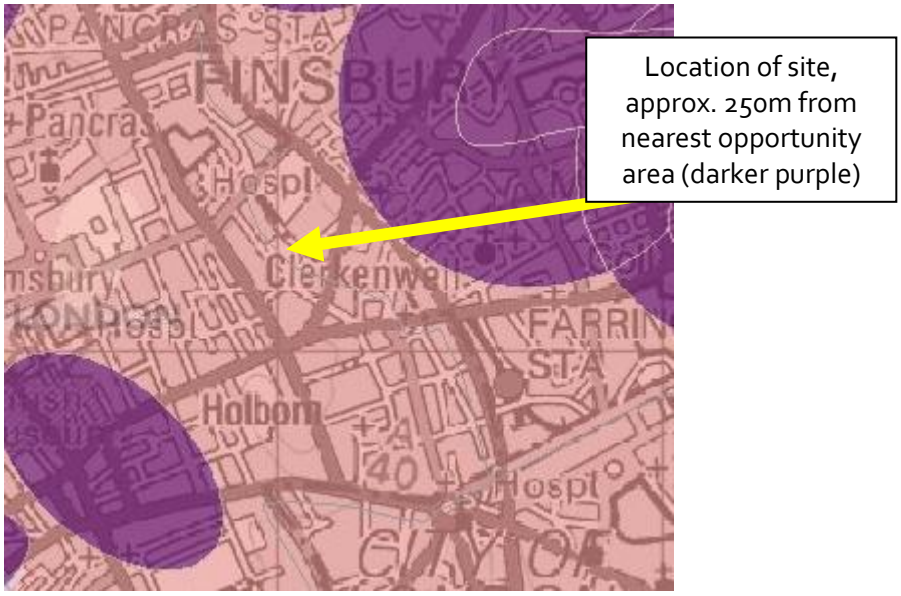


Fig ii – site distance to purple opportunity areas

10. District Heating Commercial Operation and Management

10.1 A district heating network has been proposed for the development to serve all domestic and non-domestic buildings on site.

10.2 Each dwelling or commercial space will have a Consumer Interface Unit (CIU), which will control heating and hot water within the home. Each CIU will have a heat meter and a meter for metering and billing by a third party company. The metering and bill system will be either wireless or linked by an M-bus cable network to allow for remote meter reading and billing.

10.3 This will ensure all plant is operating efficiently as possible to minimise waste and at optimum running hours to benefit from financial incentives (RHI or ROCs). To achieve this the plant will be sized to meet the appropriate loads and a thermal storage volume maximised to store any excess heat energy that can be used at a later time.

11. Overheating Analysis

11.1 This development will take the following measures to reduce demand for cooling:

11.1.1 Minimising internal heat generation through energy efficient design:

- Heat distribution infrastructure within buildings will be designed to minimise pipe lengths, particularly lateral pipework in corridors of apartment blocks.
- Pipe configurations will be adopted which minimise heat loss e.g. twin pipes.

11.1.2 Reducing amount of heat entering the building in summer:

- Use of carefully designed shading measures, including balconies, louvres, internal or external blinds, shutters, trees and vegetation.
- Use of thermal mass and high ceilings to manage the heat within the building: Increasing the amount of exposed thermal mass can help to absorb excess heat within the building.

11.1.3 Passive ventilation:

- The use of openable windows, shallow floorplates, dual aspect units, and designing in the 'stack effect.'

12. Energy Efficient Design and Energy Consumption

1.1. The proposed development aims to reduce greenhouse gas emissions and wastage of light, heat and water through a series of measures, as part of the energy design strategy:

1.2. Paragraph 2.3.40 of the London Plan Housing SPG (March 2016) states: "good single aspect one and two bedroom homes are possible where limited numbers of rooms are required, the frontage is generous, the plan is shallow, the orientation and or outlook is favourable, and care is taken to mitigate the potential for overheating without the need for mechanical cooling."

1.3. In response to this, it is clarified that in the MPA's proposals each of the flats have generous frontages with shallow floor plans.

1.4. All of the one and two bedroom flats are above ground floor level, negating the need for obscured glazing or fixed openings. On first floor and above, each of the units will achieve good levels of light and ventilation. This is explored further in the Daylight and Sunlight Statement also submitted as part of the CRTBO.

1.5. As outlined in the Daylight and Sunlight Statement also submitted as part of the CRTBO, following the BRE-recommended tests on light carried out on the site, it can be seen that much of the site is compatible with these advisory tests.

Elsewhere, the rooms that fail some of the tests are nevertheless compatible with the BRE guidance that states *"in a historic city centre, or in an area with modern high rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings."* [2] This is because, as outlined in the Heritage statement also submitted as part of the CRTBO, the designs are beneficial to the local character.

1.6. The only single aspect, north-facing units overlook the proposed landscaped courtyard which is traffic- free and a peaceful environment. This reduces the need for increased ventilation, obscured glazing or fixed openings.

1.7. Throughout the development, including in the single aspect, north-facing units, the ceiling heights will exceed the London Plan minimum of 2.5m. This will aid the achievement of a good level of light and ventilation.

1.8. Bedroom windows are recessed from the front of the building by a further 1.5m. This makes them more weather resistant and reduces the need for mitigation such as mechanical cooling systems.

1.9. These elements of the design will mitigate the potential for overheating without the need for mechanical cooling.

1.10. Ventilation strategy is driven by acoustic and air quality. The ventilation approach is for MEV (mechanical extract ventilation) over MVHR (mechanical ventilation and heat recovery) as there is less installation, façade penetrations and maintenance.

1.11. As outlined within this statement, the building makes 35% energy reduction compared to Part L of Building Regulations.

1.12. As outlined within this statement and in the Viability Assessment the shortfall will be addressed through a cash in lieu contribution to the relevant borough to be ring-fenced to secure delivery of carbon dioxide savings elsewhere, in accordance with London Plan 2016 Policy 5.2E.

1.13. Low energy lighting will be utilised extensively with motion sensors where possible to minimise energy wastage.

1.14. The project will include an external lighting scheme in order to improve the quality of the environment and public safety. These systems will be on timers, which will be seasonally adjusted, again in order to minimise energy wastage.

[2] *Site Layout Planning For Daylight and Sunlight: A guide to good practice* (2011).

1.15. The indicative U-Values, air permeability, and efficiencies of the exhausts and lighting for the project conform with Building Regulations L1A:

- Roof 0.20W/(m²K)
- Ext Walls 0.30W/(m²K)
- Party Walls 0.20W/(m²K)
- Floor 0.25W/(m²K)
- Glazing 2.00W/(m²K)
- Air Perm. 3.5m³/(hm²) at 50 Pa

1.16. The following elements will meet indicative requirements for energy and water to achieve 35% better than Part L of the Building Regulations 2013 and 105 litres/person/day water use:

- Improved U values over and above the requirements of AD Part L.
- Connection to decentralised communal CHP as lead boiler and high efficiency condensing boilers (91%) within communal energy centre.
- Low energy lighting to 100% of areas in the dwelling.
- High efficiency heating system with good zone, time and thermal controls.
- Low air permeability.

13. Waste

13.1 Space will be allocated for recycling within the units/ refuse stores and the development will be managed by a managing agent with responses to cover grounds and building maintenance, refuse collection and management.

13.2 The proposals commit to minimising demolition and construction waste being sent to landfill.

13.3 As outlined elsewhere, the proposals commit to achieving BREEAM excellent (for the non-domestic uses) which requires at least 90% by weight of construction and demolition waste to be diverted from landfill. This will be applied on a site-wide basis

14. Transport

14.1 The PTAL for the site is 6b (excellent).

14.2 The Site is very well served by existing bus routes. A total of nine bus routes have stops which are accessible within PTAL walking distance (640m or 8 minute walk)

of the Site. The nine accessible bus routes surrounding the Site provide a viable sustainable travel option to the majority of central London.

14.3 The Site is located between Kings Cross/St Pancras and Farringdon stations. Farringdon, Kings Cross and St Pancras are step-free stations. Farringdon Station is located 900m walking distance southeast from the centre of the site. This is the closest National Rail Station to the site.

14.4 The station is also served by three London Underground lines (Circle, Metropolitan and Hammersmith & City).

14.5 When CrossRail opens in 2018, Farringdon will also be served by CrossRail trains.

14.6 Kings Cross and St Pancras National Rail Stations are located approximately 1,300m walking distance northwest (16 minute walk) from the centre of the site. Kings Cross and St Pancras stations serve national and international train services and six London Underground lines (Victoria, Northern, Metropolitan, Circle, Hammersmith & City and Piccadilly). Other London Underground Stations at Angel, Chancery Lane, Holborn and Russell Square are also within a ten to fifteen minute walk from the site.

15. Cycling Links

15.1 The site is very well served by existing cycle links. The Transport for London (TfL) Cycle Guide describes many of the surrounding routes of the site as 'routes signed, or marked for use by cyclists on a mixture of quiet or busier roads' or as 'quieter roads that have been recommended by cyclists'.

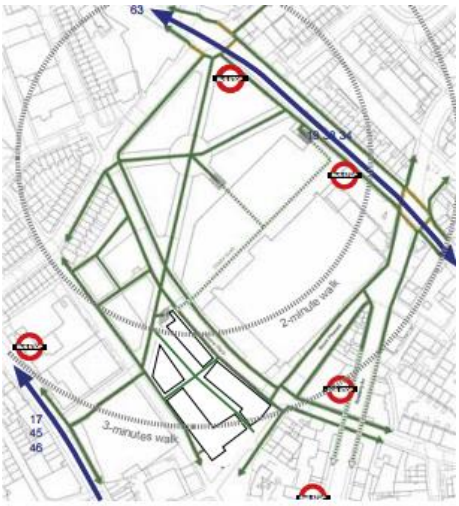
15.2 The cycle route which passes the eastern side of the site on Farringdon Road extends past Farringdon Station to Elephant and Castle in the south, where it connects with Cycle Superhighway 7 (Morden – The City). Farringdon station can be accessed by bicycle in approximately five minutes from the Site.

15.3 The site is also served well by the surrounding Cycle Hire Scheme, with docking stations located on Gray's Inn Road, Northington Street, Farringdon Road, Rosebery Avenue and Margery Street.

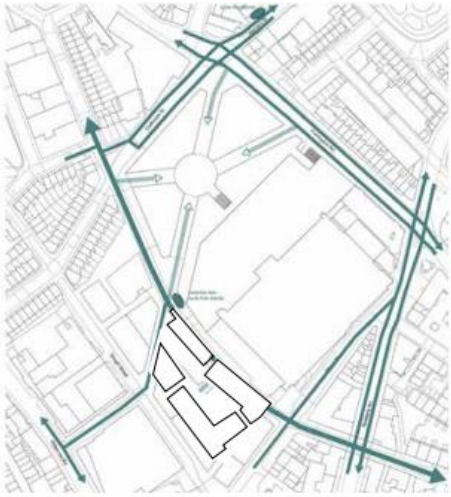
15.4 Car-Free Development: as set out above, the site has exceptional access to public transport and cycle facilities, together with the range of shops and services in the central London location. The site is recognised as a Low Parking Provision Area where Camden would expect car-free development. For this reason, the

development is proposed to be car-free with the exception of disabled parking, of which six spaces will be provided through on-street parking.

15.5 There will be 125 secure cycle parking spaces, which will be well-lit and covered by CCTV.



1. Walking and buses



2. Cycling

3. Vehicle Servicing

4 - Basement and car parking strategy

16. Water

16.1 Camden Guidance states that new residential development will be required to demonstrate that the development is capable of achieving a maximum internal water use of 105 litres per person/day, with an additional 5 litres person/day for external water use.

16.2 The development proposals will focus on minimising water consumption through a range of features, including installation of water conserving fittings.

16.3 Careful consideration has been given to treatment along the retaining wall adjacent to the flood plain. In addition to this, Sustainable Urban Drainage Systems (SUDS) approaches will be used, as outlined in the SUDS pro forma also submitted as part of the CRTBO. These include permeable surfaces in open spaces and Pedestrian routes where possible in order to mitigate surface water runoff.

16.4 As part of the SUDS approach of the proposals, and in line with London Plan Policy 5.13, the following drainage hierarchy is used with regards to surface water run-off

- Store rainwater for later use
- Use infiltration techniques, such as porous surfaces in non-clay areas
- Attenuate rainwater in ponds or open water features for gradual release
- Attenuate rainwater by storing in tanks or sealed water features for gradual release
- Discharge rainwater direct to a watercourse.
- Discharge rainwater to a surface water sewer/drain
- Discharge rainwater to the combined sewer.

16.5 The SUDS proforma, also included in this CRTBO submission, outlines the type of Sustainable Drainage System (SuDS) for the site, along with details of its extent and position, in accordance with Camden Guidance. The completed proforma outlines how the proposals adhere to relevant planning policy: NPPF paragraph 103, London Plan policy 5.13, Camden Development Policy 23, and CPG3. Full details are contained within the proforma, which was completed by calfordseaden.

16.6 The design will incorporate low use water usage design throughout appliances such as 2 litre /min taps, 9 litre /min shower, low use baths @ 95 litre capacity and 4/2.6 flush toilets. This equates to 105 litres of water per person per day.

17. Construction Materials

17.1 Where possible, the project will seek to utilise locally sourced materials and components. This will include materials requiring low embodied energy with minimal transportation.

17.2 The development will meet the GLA Sustainable Design and Construction SPG requirement for at least three of the main building elements throughout the site to be A+ - D rated in the green guide to specification.

17.3 Materials will be durable and reusable/ recyclable where possible. Material dimensions will be acknowledged when setting out the building to reduce wastage.

Timber will be from an FSC certified source. No ozone depleting substances will be used in construction.

17.4 It is intended that the main contractor will be a member of the "Considerate Constructors" scheme where they will minimise disruption to the existing neighbourhood during the demolition, site clearance and construction process. The contractor will be expected to minimise environmental impact through responsible on and off-site operations.

18. Ecology

18.1 As outlined in the Ecology Statement also submitted as part of the CRTBO submission, there is no evidence that the MPA proposals will have a negative impact on ecology and biodiversity.

18.2 The MPA's proposals can be considered to have a negligible impact, with the potential of a net benefit.

18.3 The MPA proposals will take the following precautionary measures:

18.3.1 The implementation of a Construction Environment Management Plan (CEMP) during the construction phase which would adequately mitigate for any effects to statutory or non-statutory sites within proximity to the Site as a result of the proposed Development.

18.3.2 Where building demolition / vegetation clearance is required it will be undertaken outside of the breeding bird season or, if this is not possible, an ecologist will be deployed to inspect such features prior to clearance works.

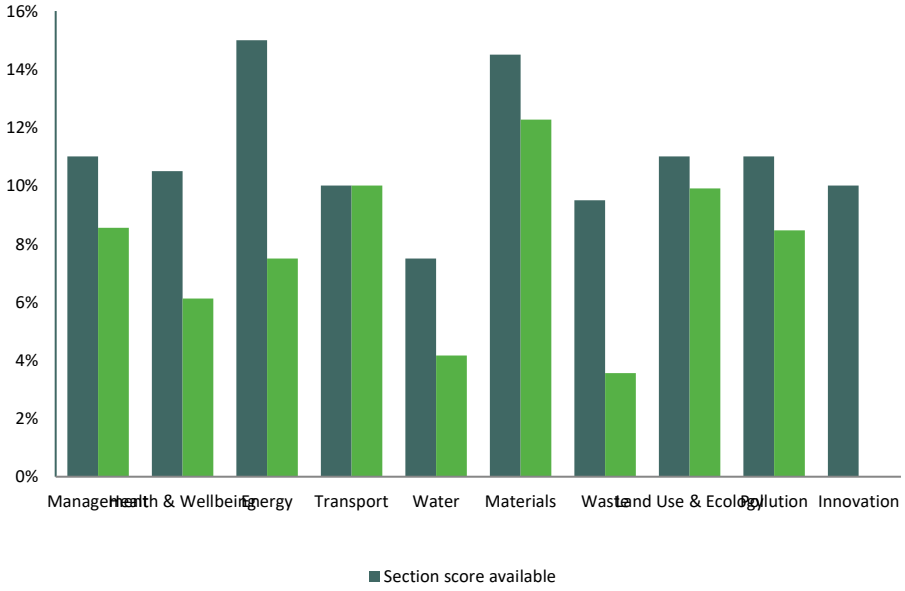
19. BREEAM

19.1 It is the intention of the design strategy, and the proposals, to achieve BREEAM Excellent for the non-residential units. Under guidance from a BREEAM accredited professional we have carried out our own indicative BREEAM pre-assessment. This achieves an Indicative BREEAM Rating of Excellent and an Indicative Total Score of 70.5%. Nothing in the proposals precludes the ability of the proposals to achieve BREEAM Excellent. Our proposals either currently do, or would be able to, meet BREEAM Excellent.

19.2 The tables below set out the overall indicative BREEAM Pre-Assessment findings and the building performance by environment Section

Building Name	Mount Pleasant – Typical Retail Building Assessment
Indicative BREEAM rating	Excellent
Indicative Total Score	70.5%
Min. Standards level achieved	Excellent Level

Table i – Findings of indicative BREEAM pre-assessment



Environmental Section	No. credits available	Indicative no. credits Achieved	% credits achieved	Section Weighting	Indicative Section Score
Management	18	14	77.8%	11.0%	8.6%
Health & Wellbeing	12	7	58.3%	10.5%	6.1%
Energy	18	9	50.0%	15.0%	7.5%
Transport	9	9	100.0%	10.0%	10.0%
Water	9	5	55.6%	7.5%	4.2%
Materials	13	11	84.6%	14.5%	12.3%
Waste	8	3	37.5%	9.5%	3.6%

Land Use & Ecology	10	9	90.0%	11.0%	9.9%
Pollution	13	10	76.9%	11.0%	8.5%

Tables ii & iii - Building Performance by Environment Section

19.3 The Full details of the BREEAM criteria that this development meets, and which make up the achievement of the 'Excellent' Level are outlined in the BREEAM UK New Construction 2014 Pre-Assessment Estimator which has also been submitted.

20. Conclusions

1.3. It is the design intent of the Mount Pleasant proposals to provide a low emission development to achieve or improve on the requirements of building regulations to accord with London Plan requirements the requirements of *London Plan 2016 P*olicy 5.2 target of zero carbon emissions. The development achieves the *London Plan 2015* Policy 5.2 target of 35% carbon dioxide emissions reduction from regulated energy over Part L 2013 emissions, and the remaining emissions are offset as outlined in *London Plan 2016* Policy 5.2E. The cost of offsetting is included in the developer contributions as outlined in the Viability Statement.

.

20.1 To achieve these targets, the methodology outlined in the National Policy, London Plan and Camden policy has been implemented and incorporated into the designs, and the proposals commit to achieving BREEAM 'Excellent for all non-domestic use.

20.2 Should there be any concerns regarding any aspect of the CRTBO the applicant would be willing to address them prior to a decision being made, and would accept necessary and reasonable conditions if appropriate.