



1 Example Street London SW1A 1AA

SUSTAINABLE DESIGN STATEMENT

On behalf of Example Developments Ltd

Wren

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Executive Summary

- 1.1 This Sustainable Design Statement is submitted by Wren on behalf of Example Developments Ltd in support of a full planning application for the change of use and conversion of the vacant upper floors of 1 Example Street, London SW1A 1AA, to ten flats within Class C3, with the ground-floor Class E unit retained.
- 1.2 The governing fact is that this is a conversion. Every square metre of accommodation is created within an existing mid-nineteenth-century building, with solid masonry walls, a slated roof behind a parapet and a fixed pattern of openings in a conservation area. That constrains what can be done to the fabric and it determines which regulatory requirements apply. It also delivers the single largest carbon saving in the scheme, which is the embodied carbon not spent: the retention of the existing structure and envelope avoids an estimated 1,240 tonnes of carbon dioxide equivalent against demolition and rebuild.
- 1.3 On energy, the scheme follows the be lean, be clean, be green hierarchy. Fabric improvements are made where the conservation area permits them and are described honestly where they do not. All gas is removed and heating and hot water are provided by individual air source heat pumps. Photovoltaic panels of 14 kilowatts peak are installed on the flat roof of the rear structure, out of sight from the street. The scheme achieves a 38 per cent reduction in regulated carbon emissions against a Part L notional building.
- 1.4 On adaptation, an overheating assessment has been carried out to CIBSE TM59 and its findings drive the design of the openings and the ventilation. Part O of the Building Regulations does not apply to this development, and Section 6 explains why rather than assuming it does.
- 1.5 On water, the flats are formed by a material change of use within regulation 5(b) of the Building Regulations 2010, not regulation 5(g), which means the exclusion in regulation 36(4) does not bite and the optional requirement of 110 litres per person per day in regulation 36(2)(b) is available. It takes effect only if the Council imposes a condition specifying it, and the Applicant asks the Council to do so.
- 1.6 On drainage, peak surface water discharge is reduced by 75 per cent, and the strategy is set out in the accompanying Flood Risk Assessment.

- 1.7 On biodiversity, the biodiversity gain condition does not apply to this development, by virtue of regulation 7A of the Biodiversity Gain Requirements (Exemptions) Regulations 2024, inserted with effect from 6 August 2026. Section 8 sets out the two conditions of that exemption and why each is met. The scheme provides a biodiverse roof, bird and bat boxes and planting regardless, in response to N2 rather than in discharge of a condition that does not apply.

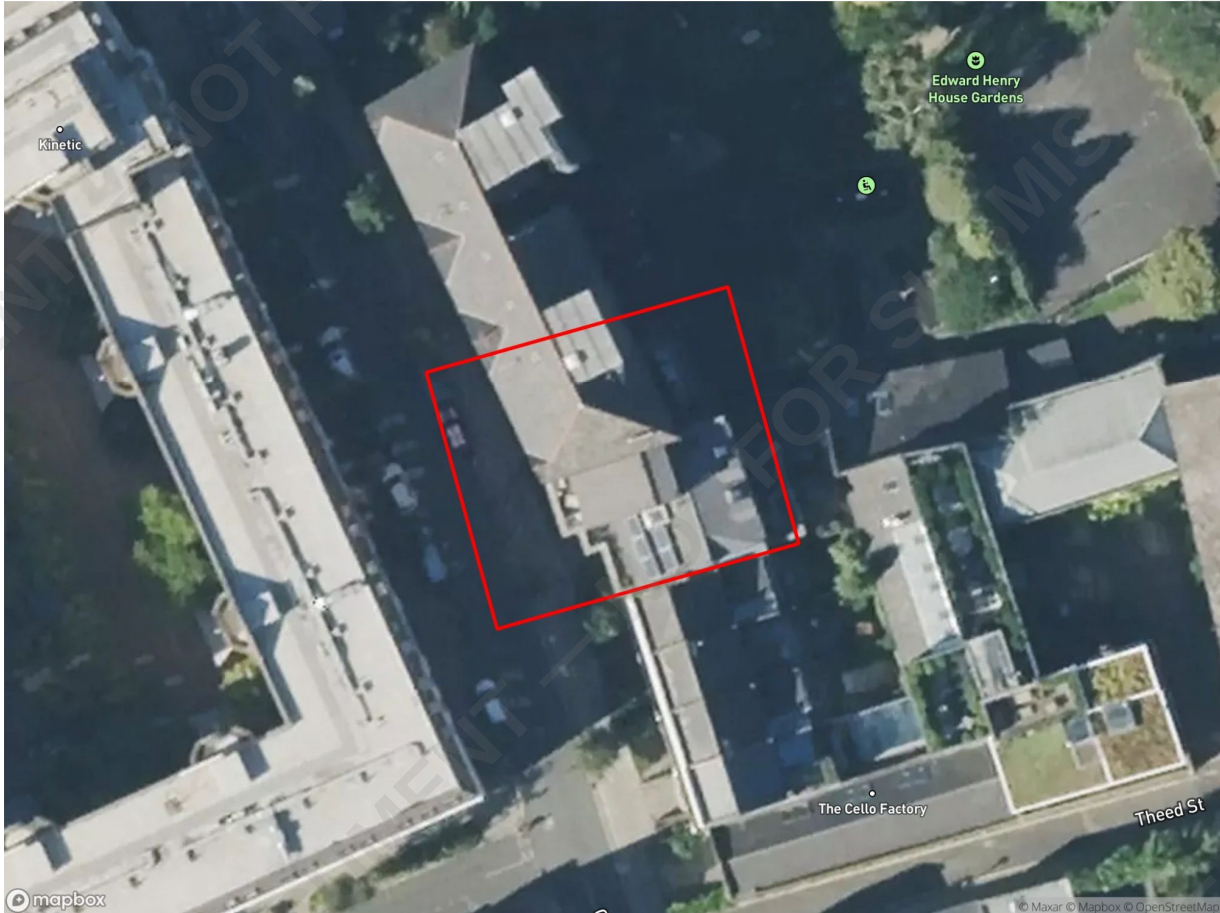


Figure 1.2 Aerial Context

Source: Mapbox / Maxar

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Introduction

2.1 Purpose

- 2.1.1 This Statement sets out the sustainability, energy, water, materials and biodiversity strategy for the proposed development, identifies what is committed at this stage and what is properly reserved to a condition or to Building Regulations approval, and states the regulatory basis for each conclusion.
- 2.1.2 This is a specimen document. The address, the applicant, the council, the planning references, the local plan policy numbers and every quantity in it are illustrative and do not relate to any real site, application or development plan. The statutory provisions and the National Planning Policy Framework policies cited are real and current. The figures are produced by the same mapping pipeline that generates imagery for a live Wren document, and are drawn over a genuine Ordnance Survey base at an indicative inner-London location; that location is not the address given on the cover.

2.2 The scheme and the floorspace that engages the requirement

- 2.2.1 Change of use and conversion of the first, second and third floors from Class E to ten flats within Class C3, with the ground-floor Class E unit of 368 square metres retained. The residential floorspace created is 704 square metres of gross internal area. No floorspace is created and none is lost; the building's total floorspace is unchanged at 1,072 square metres.
- 2.2.2 The distinction matters throughout this Statement. A great deal of sustainability policy and a great deal of the Building Regulations operate differently on new build and on a material change of use, and a statement which applies the new-build standards to a conversion will over-promise on some points and miss real obligations on others.

2.3 The regulatory characterisation of the works

- 2.3.1 Regulation 5 of the Building Regulations 2010 defines a material change of use. Regulation 5(b) applies where, after the change, the building contains a flat where previously it did not. That is this case: the building contained no dwelling before and will contain ten. Regulation 5(g), which applies where a building already containing at least one dwelling comes to contain a greater or lesser number, does not apply.
- 2.3.2 Regulation 6(1) and 6(2) then determine which requirements of Schedule 1 apply on a material change of use of part of a building. The requirements engaged here are set out at Section 6 and each is addressed in the section that follows it.

2.4 Policy framework

2.4.1 The decision-making policies of the National Planning Policy Framework (August 2026) engaged are CC2 on the mitigation of climate change, CC3 on adaptation, L3 on achieving appropriate densities, N2 on improving the natural environment, and F8 on sustainable drainage. The development plan policies engaged are CL1 on sustainable design and energy and CL4 on flood risk and drainage of the Example Borough Local Plan (2024). Those policy numbers are illustrative.

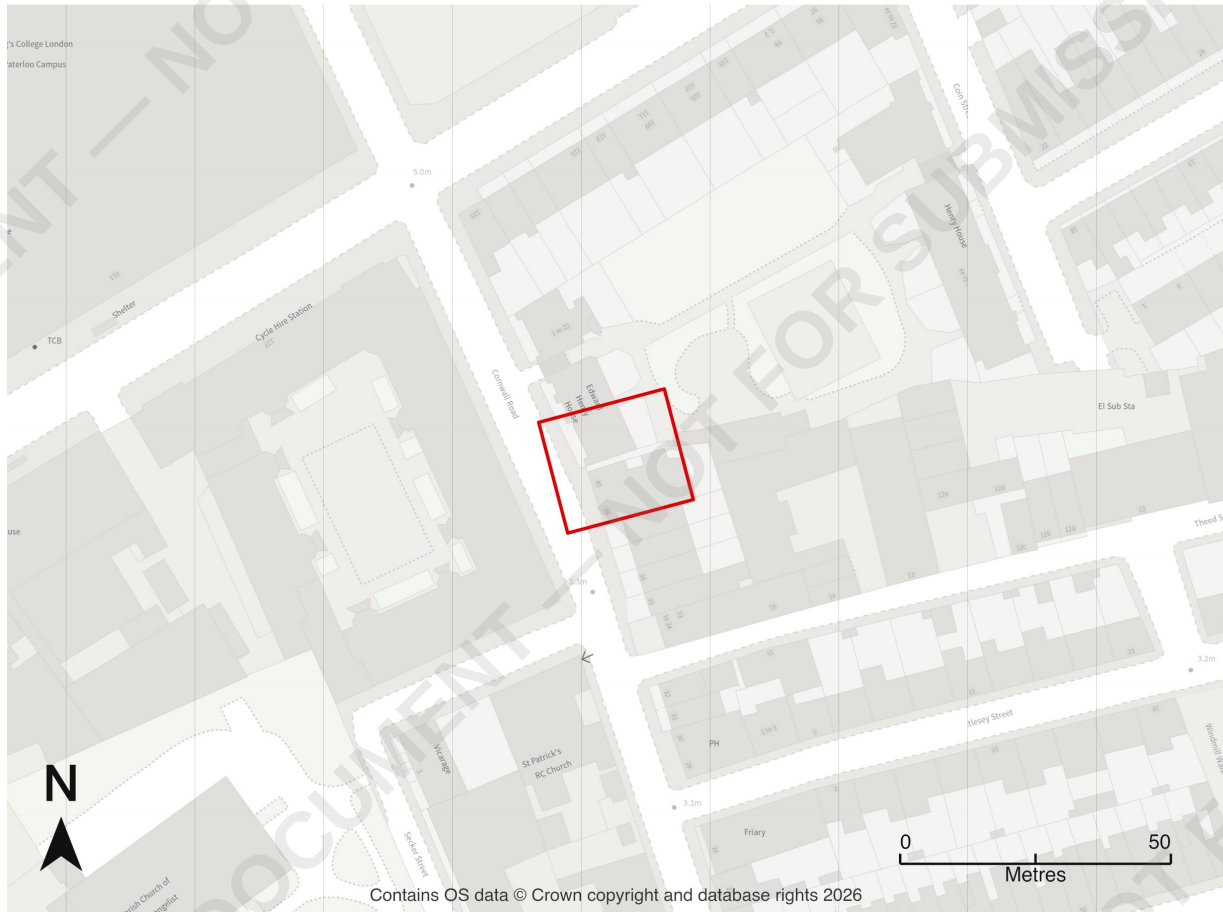


Figure 1.1 Site Location Plan

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The Carbon Already Spent

3.1 Why this section comes first

- 3.1.1 Most sustainability statements begin with operational energy. On a conversion, that puts the second-largest number first.

3.2 Embodied carbon retained

- 3.2.1 The proposal retains the existing substructure, superstructure, external walls, roof structure and floor structure in their entirety. A whole-life carbon assessment prepared in accordance with the RICS professional statement, and appended to this Statement, estimates the embodied carbon of the retained fabric at 1,310 tonnes of carbon dioxide equivalent across modules A1 to A5.
- 3.2.2 Against a notional scheme involving demolition of the existing building and construction of an equivalent new residential building on the same footprint, the retention avoids an estimated 1,240 tonnes of carbon dioxide equivalent, net of the embodied carbon of the new works.

3.3 What that figure means and what it does not

- 3.3.1 It is not an operational saving and it does not recur. It is a one-off avoided cost, and the reason it is presented first is that it is roughly forty times the annual regulated operational emissions of the completed building, so a strategy which achieved a marginally better operational performance by demolishing and rebuilding would take four decades to repay what it spent on the first day.
- 3.3.2 CC2 requires proposals to support the transition to a low carbon future. The retention of an existing building is the largest single contribution this proposal makes to that objective, and it is a contribution the design cannot subsequently lose.

3.4 Materials and the circular economy

- 3.4.1 The new works are specified to the following principles. Existing joinery, ironmongery and flooring capable of reuse are retained and refurbished in situ. The 1980s aluminium windows removed from the front elevation are segregated for recycling. New timber for the replacement windows is from certified sustainable sources. Insulation is specified in materials with a global warming potential of less than five and free of ozone-depleting substances. A pre-demolition audit and a site waste management plan are offered to be secured by condition, with a target of diverting 95 per cent of non-hazardous construction waste from landfill.

4

Energy: The Hierarchy

4.1 The hierarchy applied

- 4.1.1 The scheme follows the be lean, be clean, be green hierarchy: reduce demand, supply energy efficiently, then use renewable energy. Each step is taken in turn, and where the conservation area constrains what can be done, that is stated rather than absorbed into a favourable figure.

4.2 Be lean: fabric first

Table 4.1: Fabric performance

Element	Existing	Proposed	Notes
External walls	Solid brick, 0.35 m, U-value 1.7 W/m ² K	Internal wall insulation, U-value 0.35 W/m ² K	Applied to all external walls; hygrothermal assessment appended
Roof	Uninsulated, U-value 2.3 W/m ² K	Insulation at rafter and ceiling level, U-value 0.15 W/m ² K	No external alteration
Windows, front elevation	Aluminium, single glazed, U-value 5.6 W/m ² K	Timber sash, putty glazed, single, with secondary glazing, U-value 1.8 W/m ² K	See below
Windows, rear elevation	Aluminium, single glazed	Timber, slim double glazed units, U-value 1.4 W/m ² K	Not visible from the public realm
Air permeability	Not measured	5.0 m ³ /h.m ² at 50 Pa	Target for a conversion of solid masonry

4.3 Where the fabric strategy is constrained, and how

- 4.3.1 The front elevation windows are the point at which conservation and energy pull against one another, and the scheme resolves it in favour of conservation. The Council's conservation officer requires putty-glazed single glazing to the front elevation, because a slim double-glazed unit cannot be putty glazed and the resulting bead alters the sightline of a sash window. The scheme accepts that. The energy consequence is a U-value of 1.8 rather than 1.4 watts per square metre kelvin for eighteen of the thirty-one windows, and that consequence is carried in the modelling at Section 5 rather than assumed away.

4.3.2 Secondary glazing in a slim aluminium frame set back within the reveal is proposed to those eighteen windows, which recovers most of the difference without any external change.

4.3.3 Internal wall insulation on a solid masonry wall of this age carries a risk of interstitial condensation. A hygrothermal assessment to BS EN 15026 has been carried out and is appended; it supports the specified build-up, which uses a vapour-open wood fibre system rather than a foil-faced board, and it identifies the detailing at the joist ends which the Building Regulations submission must resolve. That risk is real and is recorded rather than left to be discovered on site.

4.4 Be clean: heat and efficient supply

4.4.1 The existing gas installation serving the upper floors is removed in its entirety and no gas is connected to any dwelling. There is no district heating network within reach of the Site; the Council's heat map shows the nearest network 1.4 kilometres away with no committed extension, and the Applicant offers a condition requiring the incoming services to be arranged so that a future connection can be made without opening up the completed dwellings.

4.5 Be green: low-carbon heat and renewables

4.5.1 Heating and hot water are provided to each dwelling by an individual air source heat pump with a seasonal coefficient of performance of 3.2, with the external units located on the flat roof of the rear ground-floor structure, screened, and acoustically assessed against the Council's standard at the nearest residential window.

4.5.2 A photovoltaic array of 14 kilowatts peak is installed on the same flat roof, generating an estimated 12,100 kilowatt hours a year. The array is not visible from Example Street or from any public vantage point in the conservation area, which is why it is on the rear structure and not on the main roof slope.

4.6 The result

Table 4.2: Regulated carbon emissions

Stage	Emissions (kg CO ₂ e/yr)	Reduction against baseline
Part L notional building	4,880	—
After be lean (fabric)	3,690	24%
After be clean and be green (heat pumps and PV)	3,026	38%

4.6.1 The scheme achieves a 38 per cent reduction in regulated carbon emissions against the Part L notional building.

4.7 What the figure does not claim

- 4.7.1 It is a regulated emissions figure and it excludes unregulated energy use. It is a modelled figure, produced under the Standard Assessment Procedure, and the as-built performance will depend on the workmanship of the insulation and airtightness works. The Applicant offers a condition requiring as-built SAP calculations and airtightness test results to be submitted before first occupation, which is the only way the figure is made good.

5

Which Building Regulations Requirements Apply

5.1 Why this is set out expressly

- 5.1.1 Regulation 6 of the Building Regulations 2010 applies a specified list of requirements on a material change of use, and the list is not the same as for new build. Two consequences follow that a statement written for a new-build scheme would get wrong: one requirement that is often assumed to apply does not, and several that are easily overlooked do.

5.2 The requirements engaged

Table 5.1: Schedule 1 requirements applying to this material change of use

Requirement	Applies Basis	
L1 – conservation of fuel and power	Yes	Regulation 6(1)(a): applies in all cases
G2 – water efficiency	Yes	Regulation 6(1)(h): material change of use within regulation 5(b)
E1 to E3 – resistance to the passage of sound	Yes	Regulation 6(1)(f): material change of use within regulation 5(b)
C1(2) – resistance to contaminants	Yes	Regulation 6(1)(d): material change of use within regulation 5(b)
Q1 – security	Yes	Regulation 6(1)(j): material change of use within regulation 5(b)
F1 – ventilation	Yes	Regulation 6(1)(a): applies in all cases
B1 to B5 – fire safety	Yes	Regulation 6(1)(a): applies in all cases
B4(1) – external fire spread, walls	Yes	Regulation 6(1)(c): the building exceeds eleven metres in height
O1 – overheating	No	Not listed in regulation 6

5.3 The point on B4(1)

- 5.3.1 Regulation 6(1)(c) applies requirement B4(1) where the building exceeds eleven metres in height. This building has a parapet at 14.2 metres above ground level. Because this is a material change of use of part only of a building, regulation 6(2)(c) provides that in a case to which regulation 6(1)(c) applies, the whole building must comply with B4(1) – not merely the part changing use. The Building Regulations submission will need to address the ground floor as well as the upper floors, and the Applicant records it here because it is a cost and a programme item that a conversion appraisal frequently misses.

5.4 The point on O1

- 5.4.1 Requirement O1 of Schedule 1, which addresses overheating in new residential buildings, is not among the requirements regulation 6 applies on a material change of use. Part O does not apply to this development.
- 5.4.2 That is stated because a great many sustainability statements assert compliance with Part O on conversion schemes, and an assertion of compliance with a requirement that does not apply tells the decision-maker nothing about whether the flats will overheat. Overheating is dealt with at Section 7 as a planning matter under CC3, on evidence, rather than by reference to a regulation that is not engaged.

6

Adaptation and Overheating

6.1 The policy requirement

- 6.1.1 CC3 requires proposals to be planned for in ways that avoid increased vulnerability to the range of impacts arising from climate change, and to be designed to take account of those impacts. Overheating in urban residential accommodation is the impact most directly engaged by this proposal.

6.2 The assessment carried out

- 6.2.1 A dynamic thermal model has been prepared in accordance with CIBSE TM59, Design methodology for the assessment of overheating risk in homes, using the CIBSE Design Summer Year weather file for the London region for the 2050s high-emissions scenario at the 50th percentile. All ten dwellings were modelled. The assessment is appended.

6.3 Findings

- 6.3.1 Against the two TM59 criteria — the number of occupied hours during which the operative temperature exceeds the comfort threshold in living rooms, kitchens and bedrooms, and the number of hours during which bedroom temperature exceeds 26 degrees Celsius at night — eight of the ten dwellings passed both criteria on the initial design. Two, both on the third floor beneath the roof, failed the night-time bedroom criterion.

6.4 What was changed as a result

- 6.4.1 The two third-floor dwellings were redesigned. Roof insulation was increased from the specified 0.15 to 0.11 watts per square metre kelvin; the rear-elevation windows to those bedrooms were changed to a configuration permitting secure night-time purge ventilation with a restrictor and an integral insect screen; and the internal layout was revised so that each of those bedrooms has openable windows on two orientations, allowing cross-ventilation.
- 6.4.2 On remodelling, both dwellings pass both criteria. That sequence is set out because a TM59 assessment which reports only a pass tells the reader nothing about whether it drove the design.

6.5 Solar control

- 6.5.1 No external shading is proposed to the front elevation, external shutters or brise-soleil being unacceptable in this conservation area. Solar control is achieved by glazing specification, by the depth of the existing window reveals, which is 340 millimetres in the original masonry openings and provides meaningful self-shading at high summer sun angles, and by the purge ventilation strategy above.

6.6 Mechanical cooling

- 6.6.1 No mechanical cooling is proposed to any dwelling, and none is required for either TM59 criterion to be met. That is stated positively because a scheme which meets its overheating criteria by installing comfort cooling has moved the problem into the operational energy figure.

6.7 Other adaptation measures

- 6.7.1 Flood resistance and resilience at ground floor level, and the flood emergency plan, are addressed in the accompanying Flood Risk Assessment. Water efficiency, addressed at Section 8, contributes to resilience to water scarcity. The biodiverse roof provides an evaporative cooling benefit at roof level and attenuates rainfall at source.

7

Water, Drainage and Biodiversity

7.1 Water efficiency: the regulatory position

7.1.1 Regulation 36 of the Building Regulations 2010 requires that the potential consumption of wholesome water by persons occupying a new dwelling must not exceed either 125 litres per person per day, or the optional requirement of 110 litres per person per day in a case to which regulation 36(3) applies. Regulation 36(3) applies where the planning permission under which the building work is carried out specifies the optional requirement and makes it a condition that the requirement must be complied with.

7.1.2 Regulation 36(4) provides that, in that Part, "new dwelling" does not include a dwelling formed by a material change of use of a building within the meaning of regulation 5(g).

7.1.3 That exclusion does not apply here. The dwellings are formed by a material change of use within regulation 5(b) — the building will contain a flat where previously it did not — and not within regulation 5(g), which concerns a building already containing at least one dwelling. Regulation 36 therefore applies to these dwellings, and regulation 6(1)(h) independently applies requirement G2 on a material change of use within regulation 5(b).

7.2 What the Applicant offers, and what the Council must do

7.2.1 The Applicant commits to the optional requirement of 110 litres per person per day and has specified the sanitaryware and fittings accordingly, as set out in the water calculation appended to this Statement.

7.2.2 That commitment has no legal effect unless the Council imposes a condition. Regulation 36(3) requires the planning permission both to specify the optional requirement and to make it a condition that the requirement must be complied with. The Applicant therefore invites the Council to impose a condition in those terms, and asks that it be drafted to specify the optional requirement expressly rather than by cross-reference, because a condition which requires compliance with "the optional requirement" without specifying it does not satisfy regulation 36(3)(a).

7.3 Drainage

- 7.3.1 The sustainable drainage strategy is set out in the accompanying Flood Risk Assessment and is summarised here because F8 is a sustainability requirement as well as a flood requirement. The discharge hierarchy in the National Standards has been applied: infiltration is not viable, there being made ground over London Clay and a groundwater source protection zone; there is no surface water body within a kilometre and no separate surface water sewer; and discharge is therefore to the combined sewer at a restricted rate. A biodiverse roof of 120 square metres, the removal of 36 square metres of impermeable yard surfacing, 22 square metres of planting and a 9 cubic metre attenuation tank with a vortex flow control reduce the peak discharge rate for the 1 per cent annual probability event including a 40 per cent climate change allowance from 14.6 to 3.6 litres per second, a reduction of 75 per cent.

7.4 Biodiversity: whether the gain condition applies

- 7.4.1 Schedule 7A to the Town and Country Planning Act 1990 provides for a biodiversity gain condition to be deemed to be granted with every planning permission, subject to the exceptions in regulations made under it.
- 7.4.2 Regulation 7A of the Biodiversity Gain Requirements (Exemptions) Regulations 2024, inserted by regulation 3(a) of the Biodiversity Gain (Town and Country Planning) (Amendments and Transitional Provisions) (England) Regulations 2026 with effect from 6 August 2026, provides that the biodiversity gain planning condition does not apply in relation to planning permission for development which meets a first and a second condition. The first condition, at regulation 7A(2), is that the development does not impact an onsite priority habitat. The second, at regulation 7A(3), is that the development is carried out on a site which has an area no larger than 0.2 hectares.
- 7.4.3 Both are met. The first: the Site is wholly hard-surfaced, comprising a building of 420 square metres in footprint and a yard of 84 square metres finished in concrete and asphalt. The ecological appraisal appended to this Statement records no priority habitat on the Site and no habitat of any description other than a single self-seeded buddleia at the base of the rear boundary wall. The development impacts no onsite priority habitat. The second: the Site has an area of 0.05 hectares, which is no larger than 0.2 hectares.
- 7.4.4 Regulation 7A(4) provides that the exemption does not apply where the application for planning permission was made before 6 August 2026. This application is made after that date, and the exemption is available.
- 7.4.5 Regulation 7A(5), which disapplies the exemption in relation to a section 73 planning permission where the original permission was applied for or granted before 6 August 2026, is not engaged: this is an application for planning permission, not an application under section 73.

7.5 Biodiversity: what is provided anyway

- 7.5.1 No biodiversity gain plan is therefore required and no statutory gain is required to be delivered. The following are nonetheless provided.
- 7.5.2 A biodiverse substrate roof of 120 square metres over the rear ground-floor structure, with a substrate depth varying between 80 and 150 millimetres and a wildflower seed mix appropriate to the region.
- 7.5.3 Removal of 36 square metres of impermeable yard surfacing, replaced by permeable paving and 22 square metres of planting, including climbing and shrub planting to the northern and eastern boundary walls.
- 7.5.4 Four integrated swift bricks and two bat boxes on the rear elevation, at heights and orientations specified by the ecologist.
- 7.5.5 Retention of the mature London plane in the rear yard, with any works to it dealt with under a separate notice under section 211 of the Town and Country Planning Act 1990.
- 7.5.6 These are offered because N2 requires development proposals to improve the natural environment where opportunities arise, and a statutory exemption from the biodiversity gain condition is not an exemption from N2. A wholly hard-surfaced site is an opportunity, and the exemption is the reason the measures are voluntary rather than the reason there are none.

7.6 Conclusion

- 7.6.1 The scheme's largest carbon contribution is the retention of an existing building, avoiding an estimated 1,240 tonnes of carbon dioxide equivalent. It achieves a 38 per cent reduction in regulated operational emissions against the Part L notional building through a fabric-first approach constrained, in one respect and expressly, by the requirements of the conservation area; through the removal of all gas; and through air source heat pumps and a 14 kilowatt peak photovoltaic array. Overheating has been assessed to CIBSE TM59 and the assessment changed the design of two dwellings. Water consumption is committed to 110 litres per person per day, subject to the condition regulation 36(3) requires. Peak surface water discharge is reduced by 75 per cent. The biodiversity gain condition does not apply, and biodiversity enhancement is provided in response to N2 in any event.
- 7.6.2 The proposal accords with CC2, CC3 and N2 and with Policies CL1 and CL4 of the development plan.

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