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Sustainable Design Statement

Proposal:

Retrospective application for replacement of pre-existing window with a double glazed timber external door

Site:

Flat 2, 49 Montagu Square London W1H 2LW

Applicant:

Mr David Unwin

Local Planning Authority:

City of Westminster

REPORT AUDIT

Date	Rev	Author	Comment
18/04/24	-	BG	ISSUED

1. Introduction

1.1. This statement has been prepared, as specifically requested by the Local Planning Authority (LPA) in an invalidity letter dated 2nd April 24, to accompany full planning and listed building consent applications for removal of a pre-existing window and the installation of a door.

1.2. The City of Westminster state that a Sustainable Design Statement should provide a proportionate level of information or commentary to demonstrate how the design has positively addressed the sustainable design principles set out in Policy 38D in the City Plan 2019-2040. It should set out how consideration has been given to the energy hierarchy and cross reference other relevant documents where provided and relevant. This should include design implications arising from related policy, in particular:

- Policy 34B (urban greening)
- Policy 36 (Energy)
- Policy 39 (Heritage)

1.3. The City of Westminster state in guidance on the preparation of Sustainable Design Assessments:

The level of detail within your statement will depend on the size and nature of proposals. It should summarise how you have addressed policy and issues relevant to the proposal, outlining proposed design measures to mitigate and adapt to climate change which may include the following:

- *choice of building materials, for example use of robust, local or sustainably sourced materials, avoiding materials with high embodied carbon content*
- *circular economy and recycling, for example reuse and refurbishment to prevent unnecessary demolition, reusing building fabric or recycling materials on site where possible and addressing waste management issues*
- *water efficiency, for example incorporation of water saving devices and conservation measures through rainwater harvesting and greywater recycling*
- *design to reduce energy demand, summary of approach including consideration given to energy efficient design (insulation, high thermal mass and so on) and the use passive ventilation to minimise need for mechanical plant (light wells, ventilation shafts, openable windows and solar shading)*
- *energy efficient services, technologies and renewable energy generation, for example use of energy efficient plant and light installations, use of fossil fuel-free technology to supply heating and power, including low and zero carbon technologies (air source heat pumps,*

photovoltaic cells, solar thermals, heat pumps) where possible

- *adaptable and future proof design, ensure buildings are adaptable and durable and resilient and allow for connection to future services*
- *urban greening and biodiversity, demonstrate proposals have been designed to protect existing trees and habitats, maximise urban greening (for example green roofs, trees and planters) and deliver biodiversity net gain, where feasible*

1.4. This statement describes the site's context and proposal and evaluates the scheme against relevant sustainability design policies to demonstrate how the scheme is justified and compliant.

2. Site Overview

2.1. The site is an enclosed courtyard at upper ground floor level at the rear of the building. Details of the site have been set out in the Heritage Statement which was submitted as part of the applications, however the images below show the essence of the application, which is retrospective in nature, the door having been installed in 2023:

3. Sustainable Design Policies

The National Planning Policy Framework – July 2021

3.1. Section 16 of the NPPF entitled *Conserving and enhancing the historic environment* describes the approach that Councils and Applicants should have towards proposals and their impact affecting Heritage Assets.

3.2. The NPPF states in section 16

In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

NPPF 2021 page 56 par 194

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

NPPF 2021 page 57 par 201

The London Plan

3.3. The London Plan was adopted in March 2021 and is the Spatial Development Strategy for Greater London from 2019-2041. The London Plan is underpinned by 'Good Growth,' defined as 'growth that is socially and economically inclusive and environmentally sustainable.'

3.4. Policy GG2 (Making the Best Use of Land) states that planning and development must proactively explore the potential to intensify the use of land to support additional workspaces, promote higher-density development and apply a design-led approach and prioritising sites which are well-connected by existing or planned public transport.

3.5. Policy GG5 (Growing a Good Economy) advises that those involved in planning and development must promote the strength and potential of the wider city region, ensure sufficient employment and industrial space is provided in the right locations to support economic development and regeneration and maximise existing/future public transport, walking and cycling networks.

3.6. Policy E1 (Offices) states that improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported, including refurbishment. The CAZ and other nationally-significant office locations should be developed and promoted.

3.7. Policy D3 (Optimising Site Capacity Through the Design-Led Approach) states that development must make the best use of land by following a design-led approach that optimises the capacity of sites. The design-led approach requires considering design options to determine the most appropriate form of development that responds to a site's context and capacity for growth and existing and planned supporting infrastructure capacity. The policy outlines that development should achieve a safe, secure and inclusive environment (5), be of high quality and consider the practicality of use, flexibility, safety and building lifespan through appropriate construction methods (12).

3.8. The policy highlights that developments should seek to "enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape." The policy further states that development proposals should also "respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character."

3.9. Policy D5 (Inclusive Design) requires development proposals to achieve the highest standards of accessible and inclusive design. Policy D5 states that development proposals should:

- be convenient and welcoming with no disabling barriers, providing independent access

without additional undue effort, separation or special treatment (3)

- be able to be entered, used and exited safely, easily and with dignity for all (4)
- be designed to incorporate safe and dignified emergency evacuation for all building users (5)

Westminster's City Plan 2019-2040 (adopted April 2021)

3.10. Policies in the City Plan relevant to assessments made within sustainability statements include:

Policy 34 (Urban Greening)

3.11. Policy 34 (Urban Greening) states that the Council aims to achieve this through ensuring that developments, where possible, contribute to the greening of Westminster by incorporating trees, green walls, green roofs, rain gardens and other green features and spaces into the scheme's design.

Policy 36 (Energy)

3.12. Policy 36 (Energy) stipulates that "the council will promote zero carbon development and expects all development to reduce on-site energy demand and maximise the use of low carbon energy sources to minimise the effects of climate change".

Policy 38D (Sustainable Design)

3.13. Policy 38D (Sustainable Design) states that "development will enable the extended lifetime of buildings and spaces and respond to the likely risks and consequences of climate change by incorporating principles of sustainable design including:

i. use of high-quality, durable materials and detail;
ii. providing flexible, high-quality floorspace;
iii. optimising resource and water efficiency;
iv. enabling the incorporation of, or connection to, future services or facilities; and
v. minimising the need for plant and machinery.

Policy 39 (Heritage)

3.14. Policy 39 (Heritage) states that "development must optimise the positive role of the historic environment in Westminster's townscape, economy and sustainability, including maintaining the unique character of heritage assets and delivering high-quality new buildings and spaces which enhance their settings".

The Environmental SPD (ESPD)

3.15. Environmental SPD covers seven environmental topics:

- Air Quality
- Local Environmental Impacts
- Green Infrastructure
- Flood Risk
- Energy
- Waste Management
- Retrofitting and Sustainable Design

3.16. Be Lean: Use Less Energy:

The Energy Hierarchy illustrates the sustainable energy approach expected from development within the ESPD's topic of Energy. Using efficient systems to minimise energy demand from heating and cooling should be considered.

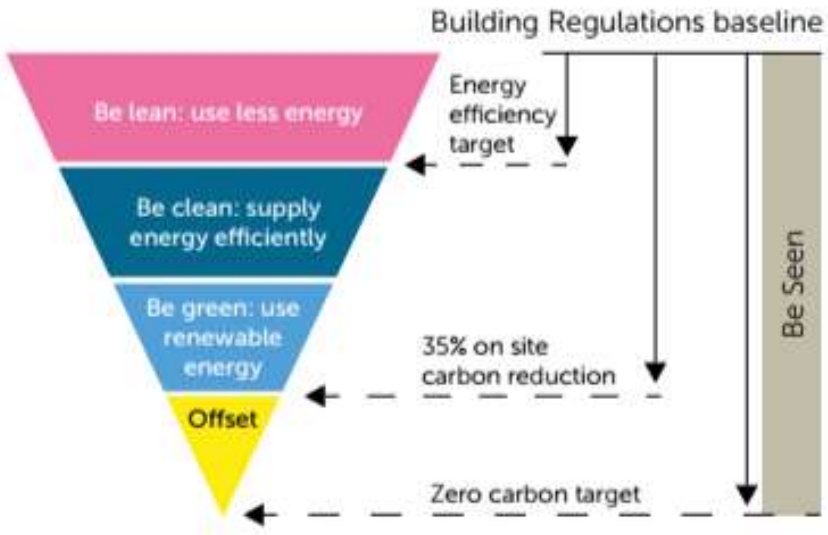


Figure 1 – Energy Hierarchy (ESPD)

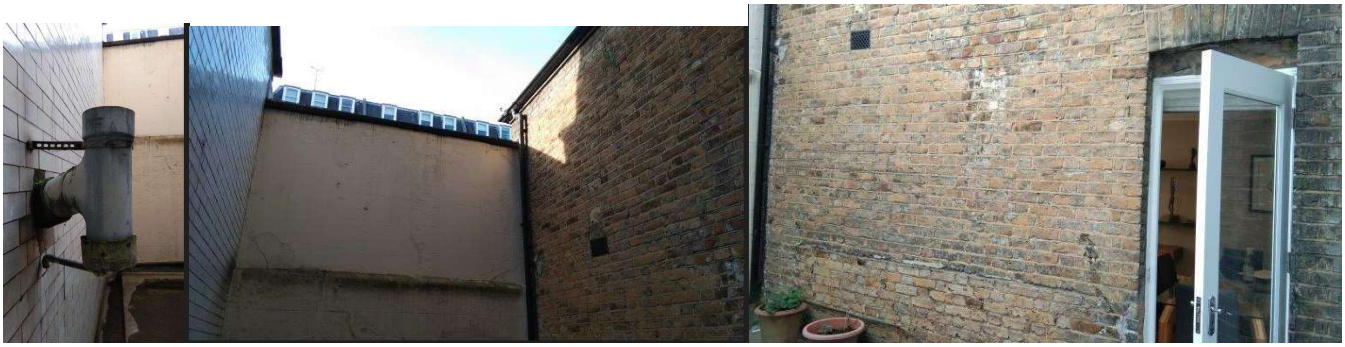
4. The Proposal

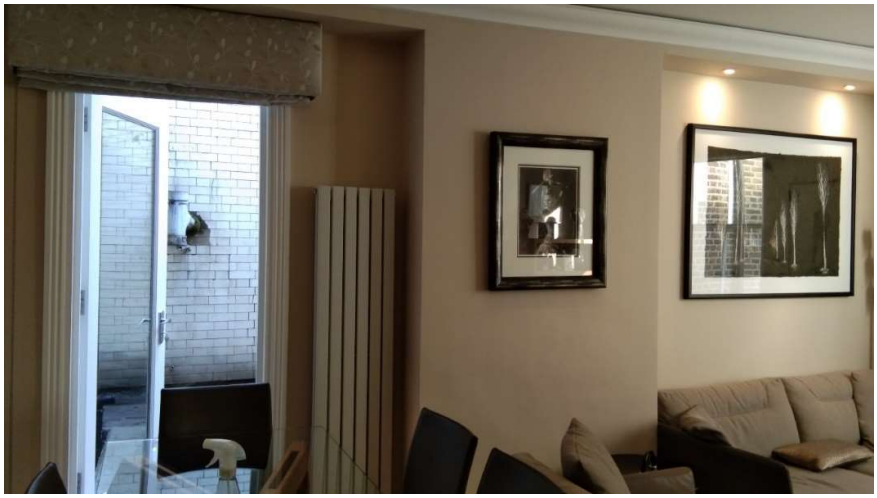
4.1. USE: The property is a private residential flat, (use Class C3) at upper ground floor level and is at the rear of the building.

4.2. DETAILS: The applicant removed the pre-existing single glazed window in 2023 and removed some brickwork below. A timber door with a double-glazed panel was inserted, complete with efficient draught seals.

4.3. The replacement door was considered essential in order to carry out regular cleaning and other maintenance of the otherwise in accessible flat roof, (see photos below)

4.4. SCALE: Only one door opening is involved. The width matches the pre-existing window, ie. 740mm and the height is 2100mm





5. Management to Achieve Sustainability Objectives, including Health and Wellbeing

5.1. The design and detailing of the door have been selected in order to minimise the use of non-renewable and other resources and for low maintenance. The door is of timber construction to accord with Heritage guidance.

5.2. The sustainability issues concerning the construction are 'de minimis'. Waste from the construction work is of a small scale and has been responsibly disposed of.

5.3. Health and Wellbeing issues are improved as a result of the proposal: especially in terms of interior comfort but also in ease of access to the roof area.

6. Air Quality

6.1. The proposal is air quality neutral.

6.2. The selection of construction products has been made to reduce harmful emissions.: product types will meet emission limits.

7. Optimising Resources: Thermal Comfort and Energy efficient Services

7.1. The installation improves operational energy performance.

7.2. No BREEAM pre-assessment is necessary to accompany the application, which does not create additional non-domestic gross internal floorspace.

8. Transport

8.1. Not relevant to the proposal.

9. Optimising Resources: Water Efficiency

9.1. Not relevant to the proposal.

10. Materials and Circular Economy

10.1. The materials used for the project are as follows:

- 14mm double glazing
- Timber from renewable sources for all carpentry and joinery and will be 'legally harvested and traded timber'. Materials and detailing reflects the need to limit long and short term degradation due to environmental factors including maintenance and cleaning

10.2. A circular economy is one where materials are retained in use at their highest value for as long as possible and are then reused or recycled, leaving a minimum of residual waste. The proposal to install the door conforms to the principles of the Circular Economy model. In addition, materials that have been removed have been recycled appropriately.

10.3. Selection of materials led to the decision to use high quality, durable materials wherever possible. The materials selected are low-carbon, ie. low VOC emitting (Volatile Organic Compound) materials, with particular consideration of sealants, adhesives, paints and cleaners.

11. Waste

11.1. Prior to the demolition work an audit of existing materials and building elements and an assessment was made for potential re-use. Consideration was given to recovery of material for high-grade or value applications on or off-site. There was no hazardous waste.

12. Land Use and Ecology including Greening, Biodiversity and Climate Resilience

12.1. There is no evidence of contamination at the site. There is no use of refrigerants.

12.2. There is no loss of ecological or habitat resulting from the proposals however in addition, there is no opportunity for any contribution to urban greening or natural habitat.

12.3. In terms of climate resilience, the design decisions, including location, materials and details, as described above make an effective contribution to climate resilience when compared with the existing arrangements.

13. CONCLUSION

13.1. The project is removal of a window and some brickwork below and the installation of thermally efficient door with a high standard of draught sealing.

13.2. The new door was necessary in order to allow maintenance of access to an otherwise inaccessible flat roof area.

13.3. The sustainability impacts of the scheme are positive in nature and, in particular, in terms of the materials and detailing. The scheme fulfils relevant sustainability policies at a local and national level and has been designed to reduce environmental impact and greenhouse gas emissions. The design leads to minimisation of the carbon footprint.

Statement authored by Brian Gatenby RIBA MRTPI