LONDON BOROUGH OF RICHMOND UPON THAMES

climate INTEGRATED SOLUTIONS

**London Borough of Richmond upon Thames**
**Supplementary Planning Document**

# DRAFT Sustainable Construction Checklist

# Guidance Document

**Draft for Public Consultation 11 December 2025 to 22 January 2026**

**Contents**

## 1 Introduction

This Sustainable Construction Checklist (SCC) Supplementary Planning Document (SPD) forms part of the assessment process for specific types of development in the London Borough of Richmond upon Thames (LBRuT). It applies to major and minor developments, residential and non-residential schemes, as well as new builds, changes of use, conversions, and extensions - where these fall within the scope of the relevant planning policy requirements.

The aim of the SCC SPD is to engage and inform developers, applicants and other stakeholders on sustainability issues relevant to their development proposals. This will help ensure that all building works contribute meaningfully to local sustainability objectives and support the creation of a townscape that both adapts to and mitigates the impacts of climate change. Overall, the measures promoted through the SCC, which are drawn from relevant planning policy, regulations, guidance and other best practice, aim to reduce environmental impact, improve the cost-efficiency of buildings, and enhance quality of life for everyone in the borough.

The SCC SPD consists of two components: the Checklist itself (an Excel spreadsheet, available to download from the Council's website); and an accompanying guidance document (this document). Submission of the SCC spreadsheet is **mandatory** for the following types of development:

- All new **residential** development providing **one or more new dwellings**, including conversions, changes of use and extensions that create one or more new dwellings.
- All new **non-residential** development including changes of use, conversions, and extensions that provide **100sqm Gross Internal Area (GIA) or more non-residential floorspace**.

The SCC SPD should be read alongside the Richmond upon Thames Local Plan (2025), which sets out borough-specific policies on sustainability and climate resilience. Developers should also refer to the London Plan (2021) and associated guidance - including the Greater London Authority's (GLA) Energy Assessment Guidance (2022) - which provides detailed advice for preparing energy assessments, particularly for major planning applications. While the principles set out in the London Plan and associated guidance should be followed, local approaches may vary, and the Local Plan adopts more ambitious standards that go beyond those in the London Plan.

Other types of development requiring planning permission that fall outside the categories listed above (e.g. householder retrofits, conversions of or extensions to existing residential properties that do not create additional dwellings, or non-residential development less than 100sqm GIA) are strongly encouraged to follow the principles set out in this Checklist as far as reasonably practicable.

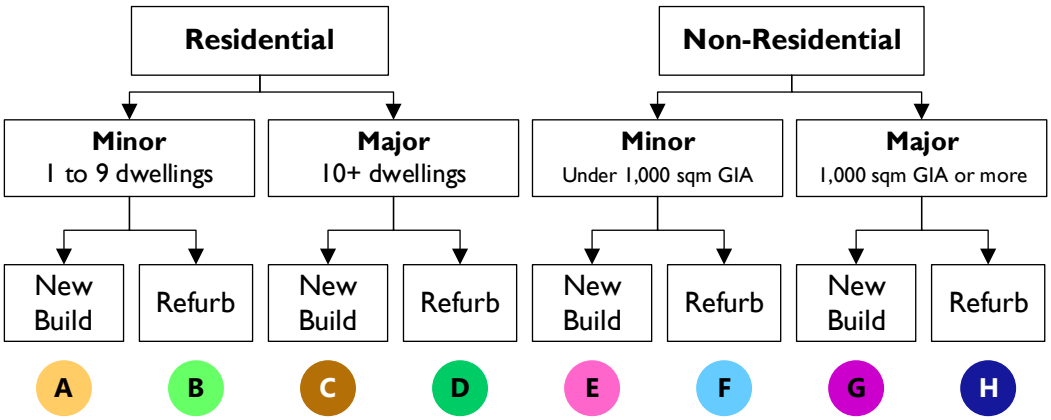
The Checklist does not replace the requirement to comply with relevant provisions of the Building Regulations, nor should it be interpreted as formal evidence of compliance with planning policy. While it provides a high-level indication of alignment with certain planning policies, it is not intended to serve as a comprehensive policy assessment. Applicants and developers are encouraged to consider relevant planning policy requirements early in the design process to help integrate sustainability measures effectively and avoid the need for costly, late-stage design alterations.

Applicants should also be aware of any new national planning policy or guidance issued since the latest version of this SCC SPD, which may be updated periodically as required.

## 2 Checklist Overview

The SCC Excel spreadsheet includes separate Checklists (worksheet tabs) tailored to different development types. These include major and minor developments, residential (domestic) and non-residential (non-domestic), as well as new build and refurbishment. **Note**: for the purposes of the Checklist, 'refurbishment' refers to change of use, conversions, and extensions to existing units creating additional dwellings/non-residential floorspace. The Checklists

have been developed to support appropriate consideration of the different development types and their associated planning policy requirements. The chart below shows which checklist(s) (labelled A to H) need to be completed depending on the type of development:




Where only one development type is applicable to the proposal, applicants should complete the 'Introduction' tab and the corresponding worksheet tab (A to H) in the SCC spreadsheet.

Where a development proposal comprises a mix of uses (e.g. residential and non-residential) or includes different types of development, applicants will be required to complete each of the relevant Checklists and ensure responses are specific to each component development where practicable. For example, if a non-residential major development includes both new build and refurbishment through change of use, the appropriate checklists for each (G and H in this case) should be completed. In some cases, a mix of major and minor Checklists may need to be completed. For example, this may apply where a small ground floor retail unit is proposed within a major residential-led mixed-use scheme. **Note:** in such cases this would not change the application as a whole being considered a major development for planning purposes.

## 3 Purpose and Scope of the Checklist

The Checklist is designed to assess how developments are proposing to reduce carbon emissions and improve energy efficiency, in line with Local Plan policy requirements. It also considers compliance with environmental performance standards, including BREEAM (Building Research Establishment Environmental Assessment Method), water consumption, alongside other sustainability factors. In addition, the Checklist addresses policies and optional targets, guidelines, and broader themes relevant to sustainable construction, such as flooding and drainage, sustainable transport, pollution, and resource efficiency (as set out at Section 8). More points are awarded for measures that demonstrate good sustainability practice and align with the borough's priorities for climate resilience and sustainable development.

The Checklist provides a structured overview of sustainability-related requirements drawn from national, regional, and local planning policies. It does not replace the need to submit other planning documents that may be required for a valid application, which are set out in the Local Validation Checklist. The Checklist includes a dedicated column for applicants to signpost detailed supporting information for specific measures (e.g., within the Energy Statement or Transport Assessment), helping ensure a transparent and robust assessment by linking SCC inputs with supporting evidence.

Each section of the checklist should be completed as accurately and thoroughly as possible, based on the developer's or applicant's knowledge and the information available at the time of submission. If a planning application is substantially amended after the initial submission, a revised checklist may be requested to reflect the updated proposals.

## 4 Scoring Process

The overall score for the Checklist will reflect the positive contribution that the development has made towards incorporating sustainability measures. A rating (A to F) is provided alongside the overall score (%) to indicate the overall performance of the proposed development, as set out at Table 1.

| Rating | Percentage Range |
|---|---|
| A | 75–100% |
| B | 65–74% |
| C | 55–64% |
| D | 45–54% |
| E | 30–44% |
| F | Below 30% |

*Table 1: Sustainable Construction Checklist rating scale*

The Checklist will be considered as a whole, with its rating and score forming part of the material weight in the planning application. While designed to apply to a wide range of development types, not all measures will be relevant. The total available score automatically adjusts when 'N/A' is selected for measures that are not applicable or technically achievable. **Note:** This option should only be used after confirming whether the measure is required by policy or could feasibly be implemented. A clear justification must be provided unless the reason is obvious due to policy exemptions or the nature of the proposal (e.g., an additional storey where certain biodiversity measures, such as ponds, cannot be incorporated). If a development scores poorly in a particular section or overall, applicants should provide justification in the comment areas of the Checklist, or signpost to other submitted documents.

## 5 Sustainability Accreditation

Building Research Establishment Environmental Assessment Method (BREEAM) is a sustainability assessment and certification scheme for the built environment that provides a widely recognised and well understood framework for the promotion of sustainable design. It allows for the assessment and rating of the environmental life cycle impacts arising from different types of developments, including energy, pollution, water, materials, health and wellbeing, and waste. Compliance with BREEAM helps mitigate the life cycle impacts of new and existing buildings on the environment and allows developers/applicants to demonstrate to the Council that development is genuinely sustainable. BREEAM 'credits' are awarded for meeting specific sustainability measures in these categories, and the total credits determine the overall rating (e.g., Pass, Good, Very Good, Excellent, Outstanding).

Applicants must submit a **BREEAM Pre-Assessment** for the relevant scheme to demonstrate compliance with sustainable construction standards and the BREEAM rating required under Local Plan Policy 6. This should identify the targeted rating and credits in line with BREEAM methodology, include a narrative on the design approach, and indicate the likely score and rating to be achieved. It should also align with other supporting documents (e.g., Energy Statement). **Note:** While a 'BREEAM Pre-Assessment Estimator' may form part of the submission, an estimator alone will not be accepted, as it does not represent a formal certified BREEAM assessment or rating.

Several BREEAM credits require early action before submitting a planning application, particularly at the Project Brief and Concept Design stages. Applicants should engage a BREEAM Assessor or Accredited Professional as early as possible to ensure compliance and avoid relying on more costly alternative credits later.

Where feasible, developments may pursue accreditation with, or follow the principles of, other established performance standards that achieve equivalent or higher outcomes than the relevant BREEAM scheme. Examples include the Passivhaus Standard, EnerPHit or the Association for Environment Conscious Building (AECB) Building Standard. In such cases, applicants are encouraged to seek pre-application advice.

### 5.1 Accredited Assessors and Certification

BREEAM (Pre)Assessments and Certifications will only be accepted if carried out by a licensed BREEAM Accredited Assessor. Assessors must be licensed by the Building Research Establishment (BRE), which delivers BREEAM training

and certification. BRE's "GreenBookLive" provides a directory of licensed and accredited BREEAM and energy assessors for all schemes, and the BREEAM website also includes an assessor directory.

Where planning permission is granted requiring BREEAM compliance, the Council will require both a Design Stage and Post-Construction assessment by an accredited assessor. To confirm that the required rating has been achieved, planning conditions may require submission of the relevant BREEAM certification and reports for written approval, either prior to commencement/occupation or within a specified period after first occupation.

If a development does not meet the required BREEAM rating, or compliance with policy requirements is not feasible due to technical or financial constraints, the Council may appoint an independent consultant to provide an impartial assessment, at the applicant's expense. Applicants must submit robust justification for non-compliance, including detailed evidence where specific credits are considered unachievable. If the overall BREEAM rating is insufficient, a breakdown of each non-targeted credit must be provided, with reasons for exclusion and its percentage score value. This ensures transparency and supports the Council's sustainability objectives.

### 5.2 Minimum BREEAM ratings and information requirements

In accordance with Local Plan (2025) Policy 6, proposals for the following types of development will be required to achieve a BREEAM 'Outstanding' rating (or equivalent) under the appropriate BREEAM scheme for the development types:

- residential development arising from conversions or change of use (*BREEAM Domestic Refurbishment*)
- non-residential development providing of 500sqm (GIA) or more floorspace, including new build (*BREEAM Non-Domestic New Construction*), and refurbishment of existing non-residential buildings and conversions (*BREEAM Non-Domestic Refurbishment and Fit Out*)
- proposals for new build residential development of 1 or more new dwellings must achieve a four-star rating (as a minimum) under *BREEAM UK New Construction: Residential* (formerly Home Quality Mark (HQM)).

*Table 2: BREEAM process by development stage and information requirements*

| Development Stage | BREEAM Process | Renewable energy and carbon emission reductions |
|---|---|---|
| **Planning Application stage** | **Pre-Assessment:** Early-stage review by an accredited assessor to outline likely BREEAM rating, key credits, and strategy before detailed design begins. | Initial design SAP* / SBEM** calculation, technical details of proposed system(s), $CO_2$ savings calculation following approved method to inform the proposed Energy Strategy and set out an Energy Statement, in line with GLA Energy Assessment Guidance. |
| **Pre-commencement** | **Design Stage Assessment**: Once the design is finalised, the assessor reviews it against BREEAM criteria and issues an interim Design Stage Certificate. | Final design SAP* / SBEM** calculation, technical details of proposed system(s), $CO_2$ savings calculation following approved method, in accordance with the previously proposed Energy Strategy.<br>*Details secured via condition prior to/within X months of commencement.* |
| **Post-construction** | **Post-Construction Assessment**: Once construction is complete, the assessor verifies that the design was implemented as intended and to document actual performance, then issuing a final BREEAM certificate and rating. | As-built SAP* / SBEM** calculation, technical details of system(s) installed, $CO_2$ savings calculation following approved method.<br>*Details secured via condition prior to/within X months of occupation.* |

A **Post-Occupancy Evaluation Stage** is also available, which reviews management practices and operational performance of the building against the predicted rating. Note that Local Plan Policy 6(A.6) states that new non-residential buildings over 500sqm must achieve 'verification stage' certification at the Post-Occupancy Stage, unless it can be demonstrated that this is not feasible.

*SAP is the Standard Assessment Procedure for Part L1 compliance with the Building Regulations (2021), which concerns domestic buildings. ***NOTE:*** *The Home Energy Model (HEM) will replace the SAP for the energy rating of dwellings. At the time of publication of this SCC SPD, HEM is still under development and the Government intends to implement the first version alongside the Future Homes Standard in the near future. The SCC SPD will be updated as appropriate to reflect this transition.*
** SBEM is the Simplified Building Energy Method for Part L2 compliance with the Building Regulations (2021) which concerns non-domestic buildings.

### 5.3 Supporting Evidence

An **Energy Statement** (sometimes called a Sustainability and Energy Statement or Energy Strategy Report) outlines the proposed **Energy Strategy** for a development and assesses expected energy demand, along with other policy requirements. It demonstrates how energy use and carbon emissions will be reduced in line with the London Plan (2021) Energy Hierarchy and should also reflect Local Plan (2025) requirements and the GLA's Energy Assessment Guidance (2022), including metrics such as Energy Use Intensity (EUI) and space heating demand. Further guidance on preparing an Energy Statement is provided at Appendix 2.

Additional information may be required depending on the site's context. This could include technical assessments, specialist reports, or mitigation strategies prepared by qualified professionals. Not all sites, particularly smaller developments, will need every type of evidence. Applicants should refer to the Local Validation Checklist, the adopted Local Plan and the London Plan to confirm required documents. Supporting evidence will be reviewed in line with standard planning application procedures, which may involve consultation with internal departments and/or external experts. The Council offers a pre-application advice service.

## 6 Financial benefits of sustainable design and construction

Financial benefits are also an important consideration when choosing to build more sustainably:

- Energy efficiency can reduce initial build costs by easing compliance with evolving Building Regulations (Part L). Adopting a best practice approach helps those involved in construction stay ahead of tightening standards and allow designers to meet them more cost-effectively.
- Lower energy demand means reduced fuel bills for residents and occupiers. With fuel prices volatile, this offers protection against future fluctuations and stabilises household costs.
- Reducing water consumption lowers water and energy bills. Awareness, supported by metering, can help occupiers cut consumption further.
- Retrofitting energy efficiency into existing buildings can be expensive and technically challenging. Incorporating measures into new developments creates a building stock with significantly reduced need for future refurbishment and retrofit, extending its useful life.
- Retrofitting existing buildings can also cut $CO_2$ emissions, improve climate resilience, and lower utility bills.
- Research suggests that improvements in indoor air quality resulting from sustainable building techniques and the use of better materials can improve health, wellbeing, and productivity[1].
- Stimulating the market for sustainable construction products supports local supply chains, drives higher product standards, and helps reduce costs for developers.

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Kukadia, V. and Upton, S. (2019) *Ensuring Good Indoor Air Quality in Buildings* [Online]. *BRE Trust.* Available at: https://bregroup.com/documents/d/bre-group/Ensuring-Good-IAQ-in-Buildings-Trust-report_compressed-2 (Accessed 18.11.2025).

## 7 Sustainable Retrofit and Heritage Considerations

In Richmond upon Thames, where the historic environment is a defining feature of the borough's identity, sensitive retrofitting is essential to balance climate resilience with heritage preservation. Proposals affecting designated or non-designated heritage assets must include a Heritage Statement (as set out in the Local Validation Checklist) assessing the asset's significance and should consider appropriate climate mitigation and adaptation measures. This should evaluate energy efficiency improvements based on current performance and, for listed buildings, consider both internal and external impacts.

Historic buildings are often inherently sustainable, built from durable, locally sourced materials with high embodied energy. Retrofitting and reuse offer a logical, climate-conscious approach, and modern technology can enhance these features without compromising historic character, ensuring buildings remain comfortable, healthy, and affordable. In line with the Local Plan's presumption in favour of refurbishment, applicants should prioritise sensitive retrofit and reuse, recognising embodied carbon savings and long-term benefits. Where climate objectives and heritage conservation conflict, the public benefit of mitigation must be clearly justified and weighed against any harm.

Applicants are encouraged to adopt energy-saving strategies that avoid damage to structure, heritage value, or setting. Simple, low-cost measures, such as reinstating shutters or draught-proofing with sympathetic secondary glazing, should be maximised wherever possible. Further technical guidance is available from Historic England, including advice on energy efficiency, retrofit, and compliance with Building Regulations:

- Historic England - Energy Efficiency and Retrofit in Historic Buildings - technical advice and guidance on climate change mitigation and adaptation for resilience, including energy efficiency, retrofit, and Net Zero.
- Adapting Historic Buildings for Energy and Carbon Efficiency: Advice Note 18 (2024)

***Note:*** *As of December 2025, the Council is preparing a Domestic Retrofit SPD to provide clear and practical guidance for householders, applicants, architects, and contractors seeking to improve the energy efficiency and environmental performance of existing homes, including those in Conservation Areas or listed buildings.*

## 8 Guidance for completing the Checklist

This section of the guidance document provides detailed guidance to support applicants and developers in completing the Sustainable Construction Checklist spreadsheet. The table below is structured to mirror the themes within the SCC spreadsheet and is designed to help users understand the purpose of each tab and how the information required relates to planning policy. Where applicable, links to external resources and further guidance are provided to assist with technical requirements or policy interpretation.

Applicants should use this guidance to ensure that all relevant parts of the checklist are completed accurately and comprehensively. This will help demonstrate compliance with planning policy, demonstrate the delivery of high-quality, sustainable development, and facilitate a smoother planning application process. Completing the checklist accurately is also essential to ensure that the score generated by the Checklist provides a fair reflection of the development's anticipated sustainability performance and will assist the Council with ongoing monitoring.

**Please note that the completed Checklist must be submitted in its original Excel format.**

Submissions in other formats, such as PDF, will only be accepted where all the Checklist content is clearly legible. If the SCC is attached to another document (e.g. Energy Statement), this must be clearly indicated at the point of submission.

If you have additional questions on the Sustainable Construction Checklist, you can contact the Planning Policy Team by emailing LocalPlan@richmond.gov.uk.

## Introduction

⭐ Use the 'Introduction' tab to identify and select the type(s) of development that apply to the proposed scheme. This will determine which tab(s) in the spreadsheet you should complete. There are 8 options for each combination of:

- **Residential / Non-residential:** Residential developments consist of self-contained homes. All other developments are considered non-residential. Note that residential institutions that do not contain self-contained dwellings (such as purpose-built student accommodation or nursing homes) fall into non-residential for this purpose, which aligns with the definitions used in Part L of the Building Regulations.
- **Major / Minor:** Major residential development is defined as 10 or more dwellings, and Major non-residential development as 1,000sqm of gross internal area (GIA) or more floorspace. Developments below these thresholds are classified as Minor development.
- **New Build / Refurbishment:** New builds are where all or most of the building fabric is constructed from scratch, even if reclaimed materials are used (including extensions of 100sqm (GIA) or more or new dwelling that consist of extension.). For the SCC SPD, 'refurbishment' includes changes of use, conversions, and extensions (that result in an additional dwelling or non-residential floorspace) where most of the existing building fabric is retained or upgraded.

## Results Summary

- The Results Summary tab requires no input, as it is automatically populated when completing the relevant tabs.

## 1. Application Details

- Input all known details. If the development name or site address is not yet known, please indicate the working title or provisional address.

## 2. Carbon Reduction

| | | | | |
|---|---|---|---|---|
| Policy | **Local Plan (2025)** | Policy 3, Policy 4 | **London Plan (2021)** | Policy SI 2 |
| Resources | GLA Energy Assessment Guidance (2022) \| GLA 'Be Seen' energy monitoring guidance (2021) \| Richmond Climate and Nature Strategy (2025 to 2030) \| LETI Climate Emergency Design Guide and Operational Modelling Guide | | | |

***Energy Assessment***

⭐ Use the Checklist to indicate whether an Energy Strategy has been submitted.

- Local Plan Policy 4 requires the provision of an **Energy Strategy** demonstrating how emissions savings have been maximised on site at each stage of the Energy Hierarchy. It must be informed by an energy assessment, which includes SAP or SBEM calculations, technical details of proposed systems, and $CO_2$ savings using the approved methodologies, demonstrating that climate change mitigation measures are appropriate for the development and ensure energy remains integral to the scheme's design and evolution.
- These findings are presented in an **Energy Statement** (sometimes called a Sustainability and Energy Statement, or simply an Energy Strategy Report) to support planning applications and ensure compliance with planning policy. Energy Statement guidance can be found at Appendix 2 of this document. The GLA has produced Energy Assessment Guidance (2022) to assist applicants with addressing the London Plan's Energy Hierarchy. While it is aimed primarily at major development, it is still a useful resource for smaller scales of development and can be adapted as appropriate (while also taking into account Local Plan policies and standards).

***Applying the Energy Hierarchy to Achieve Net-Zero and Reduce Carbon Dioxide Emissions***

- ⭐ Use the Checklist to indicate the on-site $CO_2$ emissions reduction level, as well as the highest technically achievable reduction. Higher reductions will score more favourably. Scores will be adjusted down if greater reductions are technically achievable but not proposed, or if no evidence is provided of project-specific technical constraints preventing a greater reduction. Examples may include restrictions on specifications due to heritage and conservation factors, building typology, or hot water use being assumed by the approved methodology to be high enough to overshadow any efficiency gains elsewhere.
  ***Note:*** *where more than one Checklist tab is required to be completed, the reported percentage reductions in carbon emissions should reflect only the part of the development relevant to the specific Checklist being completed. This ensures that the sustainability performance is accurately recorded for each component of the scheme. A site-wide percentage reduction may be recorded in the comment section of the checklist and/or provided within the Energy Statement and other submission documents.*
- ⭐ Use the Checklist to report the percentage of $CO_2$ emissions saved through each stage of the Energy Hierarchy, as well as compliance with Fabric Efficiency Targets and disclosure of the anticipated Energy Use Intensity and Space Heating Demand.
- To achieve the borough's target of net-zero carbon by 2043 at the latest (in accordance with the Richmond Climate and Nature Strategy), the Local Plan (2025) requires all development to reduce greenhouse gas emissions and achieve net zero-carbon in accordance with the London Plan's (2021) Energy Hierarchy, which provides a clear framework for minimising operational energy use and associated emissions:
  a) Be Lean: use less energy and manage demand during operation.
  b) Be Clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly.
  c) Be Green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
  d) Be Seen: monitor, verify and report on energy performance
- The Local Plan (2025) goes beyond the requirements of the London Plan and existing and emerging national standards, as they are not considered ambitious enough to deliver the carbon savings required to achieve our carbon reduction targets. Local Plan Policy 4 requires development to achieve net-zero with a minimum 60% on-site reduction in $CO_2$ emissions beyond Building Regulations Part L (2021), with the exception of minor residential change of use and conversions resulting in the creation of 1 or more dwellings which is required to achieve net-zero with a minimum 35% on-site reduction in $CO_2$ emissions (see Table 16.1 in the Local Plan).
- The anticipated Energy Use Intensity (EUI) and space heating demand should disclosed. While SAP and SBEM remain the principal measures of energy performance under the London Plan (2021), applicants for major developments must now also report Energy Use Intensity (EUI) and space heating demand using the GLA's Carbon Emissions Reporting Spreadsheet. These metrics help demonstrate energy efficiency and improve understanding of actual energy demand. The Local Plan (2025) Policy 6(D.8) extends the requirement to disclose the anticipated EUI and space heating demand to new-build residential development of 1 or more dwellings and non-residential development of 100sqm or more (including changes of use, conversions and refurbishments).

***Carbon Offsetting***

- ⭐ Use the Checklist to record any remaining carbon emissions (tonnes/year) and the estimated carbon offset cost, after all viable on-site measures have been applied.
- Carbon offsetting does not reduce emissions at the source and cash-in-lieu contributions to meet net zero carbon should be a last resort and only used in instances where it has been clearly demonstrated with robust and credible evidence that no further savings can be achieved on-site. In accordance with Local Plan Policy 4(E), this carbon shortfall must be offset for the assumed life of a development (e.g. 30 years) at £300 per tonne to be considered net-zero carbon. The price for offsetting carbon will be regularly reviewed and any changes to Richmond's suggested carbon offset price will be updated in future guidance.

| 3. Sustainability Accreditation | | | | |
|---|---|---|---|---|
| Policy | **Local Plan (2025)** | Policy 6 | **London Plan (2021)** | Policy SI 2 |
| Resources | BREEAM \| BREEAM UK New Construction: Residential (formerly Home Quality Mark) \| GreenBookLive | | | |

- ⭐ Use the checklist to indicate the BREEAM rating expected under the relevant BREEAM scheme. Higher ratings will score more favourably. Scores will be reduced if higher ratings are technically achievable but not proposed, or if no evidence is provided of constraints preventing a higher rating. Examples may include shell-and-core energy calculations rendering ENE01 credits unachievable, or site location limiting multiple credits (in which case the credits and their % weighting should be listed to confirm the rating threshold cannot be met).
- Local Plan Policy 6 requires BREEAM '**Outstanding**' standard or equivalent for most development types (excluding new-build residential - see below). If a developer can provide evidence from an accredited BREEAM assessor that achieving 'Outstanding' is not technically feasible, then 'Excellent' will be considered acceptable.
- For new-build residential development a minimum **four-star rating** must be achieved under the BREEAM UK New Construction: Residential (UKNCR) scheme, formerly known as the Home Quality Mark (HQM).
- A BREEAM pre-assessment prepared by a qualified Assessor should be submitted as evidence of a valid strategy for achieving the required standards.
- Planning applications must demonstrate compliance with the standard applicable at the time of submission. These rating systems provide an authoritative rating for converted or renovated homes, covering houses, flats and apartments. Dwellings created through extensions, refurbishments or conversions are subject to BREEAM Domestic Refurbishment accreditation. It is only available for conversions or extensions where a significant level of change is proposed; please contact a licensed assessor to check whether the proposed development falls into this category.
- **Note:** Failure by previous teams to address early-stage credits is not a valid reason for not meeting BREEAM ratings required by policy. It is the responsibility of applicants/developers to ensure that any predecessor has taken appropriate action to ensure policy compliance before handover.

| 4. Water Usage | | | | |
|---|---|---|---|---|
| Policy | **Local Plan (2025)** | Policy 6 | **London Plan (2021)** | Policy SI 5 |
| Resources | Water Efficiency Calculator for New Dwellings (Water Research Centre Ltd) – this calculator follows the same calculation methodology as required for Part G of the Building Regulations (note that depending on which version is used, the BREEAM assessment may use a different methodology to calculate l/p/d value). Waterwise has a range of resources available to help reduce water consumption. | | | |

- ⭐ **Residential development:** use the Checklist to indicate whether the development will exceed the higher national technical standard for water consumption of 105 litres per person per day (excluding an allowance of 5 litres for external water consumption).
- ⭐ **Non-residential development:** use the Checklist to indicate whether the development will maximise Wat 01 (Water Consumption) BREEAM credits.
- **Note:** When completing the Checklist, the use of water-efficient A or B rated appliances may be entered as 'N/A' where occupants are to provide their own appliances. Rainwater harvesting may be entered as 'N/A' where it is sufficiently demonstrated that there is no suitable external or basement space for storage tanks.
- Water supplies are vital for the borough's sustainability and residents' welfare. London already consumes more water than is available in dry years, making a secure supply an urgent priority. Limited resources and high demand have led the Environment Agency to classify the Thames Water region as 'seriously' water stressed, meaning more water is taken from the environment than it can sustain long term. Climate change and population growth will further increase drought risk and environmental impacts. Therefore, development must be designed to be water efficient and to reduce water consumption.

- Local Plan Policy 6(A.4) and London Plan (2021) Policy SI 5 require all domestic units to achieve a mainswater consumption rate of no more than 105 per head per day for internal use (excluding an allowance of up to 5 litres for external water consumption). In most cases, this will be secured by a condition requiring a Building Regulations Part G calculator demonstrating compliance and appropriate evidence for the inputs.
- Local Plan Policy 6(A.4) and London Plan Policy SI 5 state that non-domestic development is expected to meet BREEAM 'Wat 01' water-efficiency credits.

## 5. Need for Cooling

| Policy | **Local Plan (2025)** | Policy 4 | **London Plan (2021)** | Policy SI 4 |
|---|---|---|---|---|
| Resources | GLA Energy Planning Guidance webpage including Energy Assessment Guidance (2022) \| CIBSE Knowledge Portal | | | |

- ⭐ Use the Checklist indicate which steps in the Cooling Hierarchy have been implemented or enter 'N/A' if they cannot reasonably be applied, using the 'further information' explain what action has been taken and why certain measures are considered unachievable. Note that the intention is that targets can be met without resorting to options low down on the hierarchy, so if measures are not needed for this reason, please select the "*Not implemented as all targets are met higher up the hierarchy*" drop down option and points will continue to be awarded.
- The London Plan (2021) Policy SI 4 and supporting documents set out a Cooling Hierarchy which should be followed as below:
  1) minimise internal heat generation through energy efficient design
  2) reduce the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls
  3) manage the heat within the building through exposed internal thermal mass and high ceilings
  4) provide passive ventilation
  5) provide mechanical ventilation
  6) provide active cooling systems
- For **Major applications,** dynamic simulation thermal modelling is expected under TM59 (domestic) and/or TM52 (non-domestic). These methodologies do not include, as standard, assessments for expected future summer temperatures, so CIBSE TM49 guidance and Design Summer Year (DSY) datasets should also be used to ensure that new development designed for future climate conditions. Testing under DSY1 (normal conditions) should Pass all criteria in most cases. DSY2 and DSY3 (covering two different types of heatwave) should also be tested, and any risks identified should be minimised through the building design (e.g. extra openable windows or additional shading). Where this isn't possible, the design should be future-proofed for potential adaptation should these conditions become more common.
- For **Minor applications**, overheating targets within Part L and Part O of the Building Regulations will apply in most cases.

## 6. Heat Generation

| Policy | **Local Plan (2025)** | Policy 5 | **London Plan (2021)** | Policy SI 3 |
|---|---|---|---|---|
| Resources | GLA Energy Planning Guidance webpage – including Energy Assessment Guidance (2022) \| London Heat Map - developers should consult this tool to identify potential opportunities for network connections. | | | |

- ⭐ Use the Checklist to indicate which communal and/or individual heating systems are proposed within the development. Higher scores will be awarded for systems powered by renewable energy, as these help reduce carbon emissions, lower energy costs for occupants and improve the borough's energy resilience.
- ⭐ Use the Checklist to confirm if the feasibility of connecting to existing or planned heat networks has been assessed before proposing individual heating system(s).

- The London Plan (2021) Policy SI 3 sets out a heating hierarchy (primarily aimed at major development, but the principles can also be applied to minor development). The hierarchy prioritises low-carbon and renewable heat sources, and this section of the checklist is consistent with its principles. In most cases, this means connecting to a heat network if available, or, if not, using a heat pump. Options lower down the hierarchy, which rely less sustainable technologies, should only be considered in limited circumstances. Note that under Local Plan Policy 4, gas boilers in new dwellings or non-residential development are not permitted.
- New development will be expected to connect to any existing decentralised energy network (DEN). Where no network currently exists, developments should make provision for future connection, taking account of the potential for a network to come forward. Local Plan Policy 5(C) sets out additional requirements for major residential development (10 or more dwellings) and non-residential development of 500 sqm or more.

## 7. Pollution

| Policy | **Local Plan (2025)** | Policy 19, Policy 53 | **London Plan (2021)** | Policy SI 1, Policy D13, Policy D14 |
|---|---|---|---|---|
| Resources | • The Mayor's London Environment Strategy (2018) \| GLA Air Quality Positive London Plan Guidance (2023) \| GLA Air Quality Neutral London Plan Guidance (2023) \| GLA Practice Note - Control of Dust and Emissions (2024) \| Air Quality SPD (2020) \| Development Control for Noise Generating and Noise Sensitive Development SPD (2018)<br>• The Council's air pollution webpage contains resources on air quality and pollution, including the latest Air Quality Action Plan (2025 – 2030).<br>• The Considerate Constructors Scheme promotes competent management, efficiency, awareness of local environmental issues and neighbourliness during the construction process. | | | |

***Pollution and managing the impacts of development***

⭐ Use the Checklist to indicate whether measures will be taken protect the occupiers of the new development from existing sources of pollution, as well as measures to control and reduce dust and emissions during demolition and/or construction, signposting to relevant submission for evidence.

- Developments should mitigate air, light, noise, vibration, and dust impacts to acceptable levels, including during construction. Simple measures such as reducing waste, monitoring air quality, protecting soil, trees, and waterside zones, and applying pollution prevention techniques can deliver significant environmental benefits.

***Air Quality***

⭐ Use the Checklist to indicate whether an Air Quality Assessment (AQA) has been submitted demonstrating that the development will achieve at least "Air Quality Neutral" (major development). All development is required to achieve Air Quality Neutral, but the submission of an AQA may not be required for minor development, depending on the development and location.

- Local Plan Policy 53 and London Plan (2021) Policy SI 1 cover air quality. In accordance with the London Plan, Local Plan Policy 53(E) requires major developments and large-scale development subject to an Environmental Impact Assessment (EIA) to achieve "Air Quality Positive". See GLA Air Quality Positive guidance.
- Local Plan Policy 53(F) requires that all other development not covered by the above is at least "Air Quality Neutral". The GLA's Air Quality Neutral guidance document sets out further guidance, including a simplified approach for minor development.
- Note that in accordance with Local Plan Policy 53(H), the Council will require financial contributions towards off-site air quality measures where a proposed development is not air quality neutral, or mitigation measures do not reduce the impact upon poor air quality. Specific guidance for air quality in new developments is set out in the Council's Air Quality SPD (2020).

***Noise and Vibration***

⭐ Use the Checklist to indicate whether the development has taken measures to reduce noise and enhance the soundscape of the site or avoid adverse noise impacts.

- Local Plan Policy 53(J) requires encourages developers to have due regard to the Council's Development Control for Noise Generating and Noise Sensitive Development SPD (2018).

***Light Pollution***

- Use the Checklist to indicate whether the development has taken measures to reduce light pollution impacts.
- Local Plan Policies 19(B) and Policy 53(K) require control of light pollution.

## 8. Transport

| | | | | |
|---|---|---|---|---|
| Policy | **Local Plan (2025)** | Policy 1, Policy 47, Policy 48 | **London Plan (2021)** | See Chapter 10 (Transport) |
| Resources | TfL WebCAT Planning Tool \| TfL London Cycle Design Standards (2014) \| Local Implementation Plan's for Transport which bring together transport proposals to implement the Mayor's Transport Strategy (2018) at the local level \| Richmond Active Travel Strategy (2020) \| Transport SPD | | | |

***Assessing the transport impact of developments***

- Use the Checklist to confirm whether the transport impact of the proposed development has been assessed and evidence provided in accordance with Policy 47, Table 23.1 of the Local Plan, which sets out the required level of detail and type of evidence required for different uses and scales of development.

***Active travel***

- Use the Checklist to indicate whether the development will create, improve or support existing connections to local and wider transport networks, supporting sustainable travel and the Local Plan's 'Living Locally' approach.
- Local Plan Policy 47(C) requires all development to promote high-quality walking and cycling environment (both on-site and nearby) to support active travel for short journeys to local centres, services, and employment, and ensure safe, convenient access to public transport services. The level of provision for active travel should reflect the scale of the development.

***Public transport accessibility***

- **Major** development should use the Checklist to indicate the Public Transport Accessibility Level (PTAL) of the site. Higher PTALs will receive more points.
- In accordance with Local Plan Policy 47(B), major developments and/or developments that will generate a large volume of trips should be focused in areas with higher PTAL to maximise the use of sustainable transport modes. The PTAL of the site can be established by using Transport for London's WebCAT Planning Tool. In assessing development proposals, the Council will use the PTAL as a starting point but also consider other factors (e.g. highway capacity, proximity of cycle and walking routes, planned future improvements).

***Electric Vehicle Charging***

- Use the Checklist to indicate, where relevant, if the development will provide for 100% active provision for electric vehicle charging point(s).
- In accordance with Local Plan Policy 48, developments are expected to provide off-street vehicular parking, including electric vehicle charging points, in accordance with the standards set out in Policies T6.1 – T6.5 and Tables 10.3 to 10.6 of the London Plan (2021). In Richmond, the ambition is to ensure direct access to charging facilities for all vehicles. Consequently, Richmond encourages developments to provide 100% active electric vehicle parking. This does not mean that every parking space in communal parking areas needs to be equipped with a charging point, as one fast or rapid charging point may cater for many vehicles. Applicants will need to demonstrate that their development can operate effectively in the future expectation of all vehicles being electrically powered.

***Cycle Parking***

⭐ Use the Checklist to indicate whether cycle parking is proposed in accordance with London Plan (2021) requirements. In accordance with Local Plan Policy 48, developments are expected to provide off-street cycle parking in accordance with the minimum standards set out in Policy T5 and Table 10.2 of the London Plan.

| **9. Biodiversity** | | | | |
|---|---|---|---|---|
| Policy | **Local Plan (2025)** | Policy 38, Policy 39, Policy 42 | **London Plan (2021)** | Policy G5, Policy G6, Policy G7 |
| Resources | • Biodiversity SPD (to be published 2026) \| Richmond Biodiversity Action Plan (BAP) \| Local Nature Recovery Strategy (LNRS) for London (forthcoming) \| Biodiversity Net Gain – LBRuT guidance \| Government BNG Guidance for Developers \| GLA Urban Greening Factor London Plan Guidance (2023) \| Habitats & Heritage \| Greenspace Information for Greater London<br>• Trees & Development SPD (to be published 2026) \| Tree Policy (2023) \| LBRuT Protected Trees webpage \| London Urban Forest Resource Hub | | | |

***Biodiversity***

⭐ Use the Checklist to indicate the level of Biodiversity Net Gain (BNG) proposed, and which features or habitats (from a non-exhaustive list) will be incorporated into the development. Select all that apply and mark 'N/A' where site constraints prevent their inclusion (e.g. no external space for ponds, or heritage constraints).

- Local Plan Policy 39 requires development proposals resulting in one or more dwellings, and non-residential proposals that increase footprint or floorspace to deliver a measurable minimum 10% net gain for biodiversity. Where feasible, applicants are strongly encouraged to exceed this, which can be reflected in Checklist scoring. Biodiversity features should be designed to link with the wider green infrastructure network and be adaptable to climate change.

***Urban Greening***

⭐ **Major development**: Use the Checklist to indicate compliance with Policy 38(B), which requires major residential developments to achieve a minimum UGF score of 0.4, while major commercial developments should achieve a minimum score of 0.3.

- The London Plan (2021) Policy G5 requires major development proposals to contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating appropriate measures. Local Plan Policy 38 is consistent with the London Plan approach and also requires all other (non-major) developments to include urban greening elements. To assist relevant parties (including developers) in designing and specifying urban greening as part of development applications and masterplans and in calculating the UGF, the GLA have prepared Urban Greening Factor (UGF) guidance (2023), and an UGF calculator, as well as a Design Guide for Urban Greening for Biodiversity Net Gain (2021).

***Green Roofs***

⭐ Use the Checklist to confirm compliance with Policy 38 by specifying the type of green roof proposed and, where applicable, whether it will be a biodiverse green roof (the Council's preferred option). Select 'N/A' if the roof plate area is below the threshold or a green roof is not feasible, supported by evidenced justification.

- Policy 39(E) requires biodiverse green roofs to be incorporated into developments with roof plate areas of 100sqm or more, where technically feasible. The forthcoming Biodiversity SPD sets out further guidance regarding green roofs.

***Trees***

⭐ Use the Checklist to indicate whether the development resists the loss of trees, and/or whether any new trees are proposed on site.

- Local Plan Policy 42 requires the protection of existing trees and provision of new trees in accordance with London Plan Policy G7, as well as other vegetation of landscape significance that complement existing, or create new, high quality green elements, which deliver air quality, climate change, amenity and biodiversity benefits.

| 10. Resource Efficiency | | | | | |
|---|---|---|---|---|---|
| Policy | **Local Plan (2025)** | Policy 7 | **London Plan (2021)** | Policy SI 7, Policy SI 8 | **West London Waste Plan (2015)** |
| Resources | GLA Circular Economy Statements London Plan Guidance (2022) (including template) \| GLA Whole Life-Cycle Carbon Assessments London Plan Guidance (2022) (including template) \| Environment Agency – Contaminated Land statutory guidance and technical guidance \| Refuse and Storage Recycling Requirements SPD (2022) \| Richmond upon Thames Reduction and Recycling Plan | | | | |

***Circular Economy***

⭐ Use the Checklist to indicate whether a Circular Economy approach has been adopted within the proposed development.

- London Plan (2021) Policy SI 7 defines a circular economy as *'…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.'* It is a move away from the current linear economic model, where materials are mined, manufactured, used and thrown away. To demonstrate how circular economy principles will be embedded within a development, a full Circular Economy Statement and Whole Life-Cycle Carbon Assessment (WLCCA) are required for applications of 10 or more dwellings or 500sqm (GIA) or more non-residential development, but all other non-major developments should adopt a Circular Economy approach.
- The Circular Economy Statement should follow the guidance and principles set out by the GLA (see Circular Economy Statement London Plan Guidance (2022).
- WLCCAs are an established method of considering the carbon implications of every material choice across the extraction, manufacturing, construction, occupation, demolition and disposal stages. The WLCCA should be proportionate to the scale of development and demonstrate that whole life-cycle carbon savings have been maximised, in line with the GLA's Whole Life-Cycle Carbon Assessments London Plan Guidance (2022) and other latest industry guidance. Where relevant the WLCCA can be used to compare different material or design options to reach the optimal outcome.

***Site Waste***

⭐ Use the Checklist to indicate whether the development aims to meet the London Plan (2021) target for diverting construction and demolition waste from landfill to reuse, recycling, or recovery (95%, as set out in Policy SI 7). For major developments, indicate whether a Site Waste Management Plan has been prepared.

- Local Plan Policy 7(A.4) requires that all major developments, and where appropriate developments that are likely to generate large amounts of waste, to produce Site Waste Management Plans (SWMP). Note that in most cases minimum standards for SWMPs will be provided by BREEAM assessors.

| 11. Flooding and Drainage | | | | |
|---|---|---|---|---|
| Policy | **Local Plan (2025)** | Policy 8 | **London Plan (2021)** | Policy SI 12, Policy SI 13 |
| Resources | • Environment Agency – Flood risk assessments see also Flood Map for planning service and LBRuT Strategic Flood Risk Assessment.<br>• National standards for sustainable drainage systems (SuDS) - sets out minimum standards for designing SuDS to manage surface water sustainably in new development. See also the Council's Sustainable Drainage Systems webpage for further local guidance, including the Delivering SuDS in Richmond Planning Guidance Document (2016). The GLA website also hosts a range of SuDS resources including sector-specific SuDS guidance, and Transport for London have produced a SuDS in London guide (2016). | | | |

***Flood Risk***

⭐ Use the Checklist to indicate whether the development is in a low to medium risk Flood Zone (1 or 2), and whether the submission is supported by a Flood Risk Assessment (where required, as set out in the Local Plan and Local Validation Checklist).

- Please refer to Local Plan Policy 8 (Flood Risk and Sustainable Drainage) for detailed policy requirements relating to flood risk.
- The Environment Agency's Flood Map for planning service allows you to obtain flood risk information for planning applications. LBRuT has also adopted a Strategic Flood Risk Assessment (SFRA), which identifies areas in the borough at risk from flooding from the River Thames, its tributaries and other sources.

***Sustainable Drainage***

⭐ Use the Checklist demonstrate that the drainage hierarchy (including Sustainable Drainage Systems (SuDS)) has been followed. Enter 'N/A' if any measures cannot reasonably be applied, using the 'further information' explain what action has been taken and why certain measures are considered unachievable. Note that the intention is that targets can be met without resorting to options low down on the hierarchy, so if measures are not needed for this reason, please select the "*Not implemented as all targets are met higher up the hierarchy*" drop down option and points will continue to be awarded.

⭐ Use the Checklist to indicate whether the development will achieve a reduction in surface water to greenfield run-off rates.

- Local Plan Policy 7 requires the use SuDS in all development proposals to manage surface water runoff as close to its source as possible (ideally all on site), using the most sustainable solutions to reduce runoff volumes and rates. Applicants must demonstrate that development proposals comply with the following:
  1) A reduction in surface water discharge to greenfield run-off rates wherever feasible.
  2) Where greenfield run-off rates are not feasible, this will need to be demonstrated by the applicant, and in such instances, the minimum requirement is to achieve at least a runoff rate of 2 l/s or below. Where this is not possible and justification is provided, applicants should detail how at least 50% attenuation of the site's surface water runoff at peak times based on the levels existing prior to the development.

## 12. Be Seen

| Policy | **Local Plan (2025)** | Policy 4 | **London Plan (2021)** | Policy SI 2 |
|---|---|---|---|---|
| Resources | GLA Be Seen Energy Monitoring Guidance (2021) – including access to 'be seen' reporting webforms and reporting spreadsheet. | | | |

***'Be Seen' energy monitoring***

⭐ **Minor** development: use the Checklist to indicate whether arrangements will be put in place to monitor post-completion, in-use energy performance.

⭐ **Major** development: use the Checklist to indicate whether detailed metering installation plans have been/will be confirmed to enable reporting of as-built and in-use energy performance, and also indicate whether relevant data has been submitted / will be submitted via the GLA 'Be Seen' planning stage webform.

- Local Plan Policy 4(D) requires new build residential development of 1 or more dwellings and non-residential development of 100sqm or more (including changes of use, conversions and refurbishments) are required to disclose the anticipated Energy Use Intensity (EUI) and space heating demand at design and pre-occupation stage, and over at least the first five operational years.
- Major developments must monitor and report operational energy performance for at least five years via the GLA's *Be Seen* portal, following the GLA Be Seen Energy Monitoring Guidance (2021). At planning stage, this typically involves agreeing to standard conditions and/or Section 106 obligations. Applicants should plan metering infrastructure early to support future reporting and avoid costly retrofits. Developments using renewable energy are encouraged to use services that actively monitor performance and report outages or reductions in output.
- For major applications, applicants must provide accurate, verified estimates for each performance indicator at all reporting stages (planning, as-built, in-use) via the GLA Be Seen webforms. A GLA spreadsheet is available to capture data offline before submission.

## Appendix 1. Summary of Local Plan standards

The table below is taken from Local Plan (2025) Table 16.3: summary of climate change development requirements

| Development Type | Local Plan Standards |
|---|---|
| **Major residential development of 10 or more dwellings (including new build, change of use, conversions, and major refurbishments).** | • Submit Sustainable Construction Checklist<br>• Net-zero with minimum 60% on-site reduction; with a maximum of 40% to be offset at a rate of £300/t<br>• Meet London Plan Energy Hierarchy<br>• Provide Energy Strategy in line with GLA Energy Assessment Guidance 2022<br>• No gas boilers after 2024 Meet Part O, overheating mitigation requirements, and F, ventilation requirements, of Building Regulations<br>• Target of on-site renewable of 40% of building footprint<br>• Disclose the anticipated Energy Use Intensity<br>• Connect to existing Decentralised Energy Network (DEN) or one in the vicinity of the site<br>• Provide assessment of on-site DEN including microgeneration such as solar technologies<br>• Achieve four-star rating under BREEAM UK New Construction: Residential (formerly BRE Home Quality Mark)<br>• BREEAM Domestic Refurbishment 'Outstanding' (Domestic refurb only)<br>• Part G of National water standards - 110 l/p/d<br>• Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan |
| **Minor new-build residential development of 1 or more dwellings.** | • Submit Sustainable Construction Checklist<br>• Net-zero with minimum 60% on-site reduction; with a maximum of 40% to be offset at a rate of £300/t<br>• Meet London Plan Energy Hierarchy<br>• Provide Energy Strategy in line with GLA Energy Assessment Guidance 2022<br>• No gas boilers after 2024<br>• Meet Part O, overheating mitigation requirements, and F, ventilation requirements, of Building Regulations.<br>• Target of on-site renewable of 40% of building footprint<br>• Disclose the anticipated Energy Use Intensity<br>• Connect to existing Decentralised Energy Network (DEN).<br>• Achieve four-star rating under BREEAM UK New Construction: Residential (formerly BRE Home Quality Mark)<br>• Part G of National water standards - 110 l/p/d<br>• Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan |
| **Minor residential change of use and conversions resulting in the creation of 1 or more dwellings.** | • Submit Sustainable Construction Checklist<br>• Net-zero with minimum 35% on-site reduction; with a maximum of 65% to be offset at a rate of £300/t<br>• Meet London Plan Energy Hierarchy<br>• Provide Energy Strategy in line with GLA Energy Assessment Guidance 2022<br>• Connect to existing Decentralised Energy Network (DEN).<br>• BREEAM Domestic Refurbishment 'Outstanding' (Domestic refurb only)<br>• Part G of National water standards - 110 l/p/d<br>• Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan |
| **Non-residential development of 100sqm Gross Internal Area (GIA) or more (including new build, change of use and refurbishments).** | • Submit Sustainable Construction Checklist<br>• Net-zero with minimum 60% on-site reduction; with a maximum of 40% to be offset at a rate of £300/t<br>• Meet London Plan Energy Hierarchy<br>• Provide Energy Strategy in line with GLA Energy Assessment Guidance 2022<br>• No gas boilers after 2024<br>• Meet Part O, overheating mitigation requirements, and F, ventilation requirements, of Building Regulations<br>• Target of on-site renewable of 40% of building footprint<br>• Disclose the anticipated Energy Use Intensity<br>• Meet fabric efficiency targets as set out in Table 16.2 of the Local Plan<br>**Proposals above 500sqm (GIA) must also:**<br>• Connect to existing Decentralised Energy Network (DEN) or one in the vicinity of the site<br>• Provide assessment of on-site DEN including microgeneration such as solar technologies<br>• BREEAM Non-domestic New Construction 'Outstanding', where applicable<br>• BREEAM Non-domestic Refurbishment and Fit-out 'Outstanding', where applicable |

## Appendix 2. Energy Statement Guidelines for Developers

### When is an Energy Statement required?

Policy 4 of the Local Plan (2025) requires all development creating one or more dwellings and all non-residential development of 100sqm or more to submit an **Energy Statement** alongside the planning application. The statement must set out the proposed **Energy Strategy**, showing how on-site emissions savings have been maximised at each stage of the London Plan Energy Hierarchy, and should be proportionate to the scale and type of development.

### What should an Energy Statement include?

The following information should be included in an Energy Statement:

1. Baseline energy consumption, covering both regulated and unregulated[2] energy use.
    - The $CO_2$ emissions baseline should be based on the Target Emission Rate (TER) from the final building specification modelled to Part L 2021 using approved software. In the case of a change of use, the baseline should reflect the emissions of the existing building. $CO_2$ savings at each stage of the energy hierarchy (Be Lean, Be Clean, Be Green) must be calculated from this baseline. Calculations should be included with the planning application.
    - Regulated energy consumption (e.g. space heating, hot water, lighting, ventilation) should be calculated using the Government's Standard Assessment Procedure (SAP) for residential developments, or the Simplified Building Energy Model (SBEM) for non-residential developments.
    - For major residential developments, a sampling approach may be used at planning stage, with block summaries and a representative sample of unit-level SAP outputs provided. The selection methodology must be clearly explained (e.g. how samples of each relevant dwelling type, orientation and position have been selected), and the SAP results extrapolated to represent the full site.
    - Unregulated energy consumption (e.g. cooking and all other electrical appliances, and other small power (e.g. cooking and all other electrical appliances, and other small power) should be calculated using the BREDEM-12 tool for residential developments (available from BRE). For non-residential developments, non-regulated energy should be estimated using CIBSE Guide F benchmarks, or the most up-to-date version of this guidance if available.

2. Baseline carbon dioxide ($CO_2$) emissions calculated using current Part L methodology, applying any updated conversion factors published by the GLA (currently none). For new-build developments, the baseline should be based on the Part L Target Emission Rate (TER) and the building's floor area.
    - Report carbon savings beyond Part L 2021 as a % improvement of DER/BER over TER.
    - Submit 'As Designed' SAP or BRUKL outputs from approved software as evidence.
    - Both regulated and unregulated emissions should be reported, but only regulated emissions should be included in the baseline figure and to determine and carbon offsetting requirements.
    - The baseline should include emissions from gas and electricity consumption.
    - Emissions associated with water and space heating should be calculated using the plant assumed as the baseline in the relevant Part L section, unless an electric-only baseline can be robustly justified.

[2] Regulated energy consumption includes those forms of energy use covered in Building Regulations. This includes all fixed consumption inherent in the building, e.g. fixed lighting, space heating, water heating. Non-regulated energy consumptions are those Energy uses not covered by Building Regulations. This includes energy consumed by 'plug-in' appliances (e.g. lamps, TVs) and cooking.

3. Reductions in energy consumption and carbon dioxide emissions resulting from fabric efficiency measures. These measures should be prioritised before considering renewable energy installations, to minimise the development's energy demand and maximise overall energy efficiency.
    - Provide details of the energy efficiency measures incorporated into the development.
    - Where available, include specific technical information, such as building material U-values, thermal performance, and ratings of electrical appliances.

4. Reductions in energy consumption and carbon dioxide emissions resulting from supplying energy efficiently.
    - Follow the Heating Hierarchy, which priorities connecting to an existing or planned District Heat Network where available. Where this is not possible, provide heat via high-efficiency heat pumps or other low-carbon solutions.
    - In accordance with Policy 5 of the Local Plan (2025), residential development of 10 or more dwellings and non-residential development of 500sqm or more must provide a robust and credible feasibility assessment that explores: connecting to existing or planned heat networks, where available; the provision of an on-site decentralised energy network (DEN; and how the development will be future-proofed for a future potential connection.

5. Estimation of $CO_2$ reduction through use of renewable energy technologies[3]. This should demonstrate compliance with the minimum % reduction from the efficient energy baseline required by Policy 4 of the Local Plan (2025).
    - The required % emissions reduction should be calculated as a reduction from the efficient baseline emissions level calculated in step 4 (or calculated from the baseline in step 3, if step 4 is not applicable).
    - For each technology considered suitable for the site, provide a $CO_2$ reduction estimate. This should include as a minimum: proposed system size; estimated annual energy generation; estimated $CO_2$ savings; site-specific design requirements; maintenance requirements; and estimated lifecycle.
    - Where a technology has been ruled out, clear technical justification.
    - Show the location of any renewable or low-carbon energy technologies on design plans (e.g., proposed location of solar panels on roofs, or plant room for communal heating systems).
    - Example formats for summary tables containing the necessary energy and $CO_2$ offset data are provided below, which may be used to summarise the information contained in an Energy Statement.

6. Estimation of the total remaining carbon emissions over 30 years which have not been eliminated on site, and associated carbon offsetting.
    - Calculate the total residual CO2 emissions over a 30-year period that cannot be eliminated on-site.
    - Estimate the expected offset payment to the Council's Carbon Offset Fund, in accordance with Policy 4 of the Local Plan (225), using the current borough price of £300 per tonne (as set upon adoption of the Local Plan 2025). Offset payments will only be accepted as a last resort, once it has been demonstrated that all feasible on-site and near-site carbon reduction measures have been fully considered and implemented where possible.
    - Provision should be made to update this calculation based on As-Built emissions data.

7. A concluding section should summarise the contribution of each set of measures, technology or combination of technologies towards meeting the relevant carbon reduction target. It should provide recommendations on the most suitable approach for the site, based on technical feasibility, cost-effectiveness, and alignment with policy requirements.

Where it has not been possible to meet policy requirements, a clear and robust explanation must be provided, outlining the reasons and any constraints that prevented compliance.

[3] These are technologies that provide energy derived from a source that is continually replenished, such as wind, wave, solar, hydroelectric and energy from plant material but not fossil fuels or nuclear energy. Although not strictly renewable, geothermal energy and energy from heat gradients is also included.

**Note on presentation**

An Energy Statement should present technical data in a clear and accessible format. Use well-structured tables to present data for ease of reading and comparison, and include site plans where relevant, for example to indicate suitable roof areas for solar technologies or the location of plant room. Additionally, provide references for all data sources to ensure transparency and credibility.

**Example Summary Tables**

***Summary of Baseline Energy Demand***

This table may be amended or duplicated to show energy demand before and after the application of energy efficiency measures or renewable energy technologies.

| | Total Energy Demand (kWh/yr) | Associated Total $CO_2$ ($kgCO_2/yr$) |
|---|---|---|
| Hot water | | |
| Space Heating | | |
| Fixed Electrical | | |
| Appliances / Unregulated | | |
| … (any other energy consumption) | | |
| **Total** | | |

***Summary of $CO_2$ Emissions Reductions***

Where relevant, separate versions of this table should be presented for residential/non-residential, new-build/refurbishment, and site-wide.

| | Total $CO_2$ emissions (tonnes $CO_2$/year) | Stage improvement over Part L target (%) | Cumulative improvement over Part L target (%) |
|---|---|---|---|
| Baseline Part L 2021 of the Building Regulations compliant development | | | |
| Improved Be Lean emissions (after application of energy efficiency measures) | | | |
| Improved Be Clean emissions (after incorporation of efficient energy supply) | | | |
| Improved Be Green emissions (after incorporation of renewable energy technology) | | | |
| Carbon shortfall to offset (tonnes $CO_2$/year) | | | |
| Estimated carbon offset payment (£300 x tonnes over 30 years) | | | |

## Abbreviations

| | |
|---|---|
| **ASHP** | Air Source Heat Pump |
| **BER** | Building Emission Rate |
| **BRE** | Building Research Establishment |
| **BREEAM** | Building Research Establishment Environmental Assessment Method |
| **CIBSE** | Chartered Institute of Building Services Engineers |
| **CHP** | Combined Heat and Power |
| **DER** | Dwelling Emission Rate |
| **DHN** | District Heat Networks |
| **GLA** | Greater London Authority |
| **HEM** | Home Energy Model |
| **HQM** | Home Quality Mark |
| **LBRuT** | London Borough of Richmond upon Thames |
| **SAP** | Standard Assessment Procedure |
| **SBEM** | Simplified Building Energy Method |
| **SuDS** | Sustainable Drainage Systems |
| **SPD** | Supplementary Planning Document |
| **SPG** | Supplementary Planning Guidance |
| **TER** | Target Emission Rate |