

Sustainable Construction Monitoring 2017 - 2022

Planning

17 July 2023

Local Plan Authority Monitoring Report

Sustainable Construction

2017 - 2022

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1. Introduction

This Monitoring Report is one of several publications which assess the effectiveness of planning policies in the borough. Such reports will be published in a phased approach on the Council’s website.

This report monitors levels attained for relevant residential and commercial development using the Sustainable Construction Checklist ¹(SCC).

The Sustainable Construction Checklist forms a mandatory part of the planning application for the following classes of development:

- All residential development providing one or more new dwellings, including conversions and extensions that create one or more new dwellings.
- All new non-residential development providing 100 square metres (sqm) or more floorspace, including conversions and extensions (over 100 sqm)

Other classes of development, which require planning permission but do not fit into the above categories, specifically including conversions or extensions of residential or non-residential development, are encouraged to comply with the Checklist as far as possible.

2. Data sources

The data used in this report comes from the Council’s decisions analysis monitoring system and data includes planning applications with a decision date between 2017 and 2022. A total of 400 Sustainable Construction Checklist documents were analysed from approved residential and commercial planning permissions. From the 434 planning permissions analysed that would be expected to submit a Sustainable Construction Checklist as part of the application, a total of 400 or 92% did so. Although it is a mandatory requirement to submit a Sustainable Construction Checklist for all relevant applications a comprehensive energy assessment may be accepted in its place which shows compliance with the checklist requirements. The Council’s monitoring has demonstrated that occasionally a planning application may have been granted permission with a condition that a Sustainable Construction Checklist must be submitted prior to any construction taking place.

Table 1: Number of planning permissions incorporating a Sustainable Construction Checklist 2017 - 2022

	2017	2018	2019	2020	2021	2022	Total
Checklist expected	72	97	71	80	52	62	434
Checklist submitted	68	93	62	73	46	58	400
Percentage with checklist	94%	96%	87%	91%	88%	94%	92%

3. Carbon Dioxide emissions reduction

New non-residential buildings, including extensions, over 100sqm and below 1,000sqm floorspace, including change of use or conversion to non-residential, and between non-residential use classes, should achieve a 35% reduction in CO₂ emissions over Building Regulations (2013)². Minor residential developments of up to 10 dwellings should also achieve a 35% reduction in CO₂ emissions. Change of use through prior approval, or where the proposal only relates to minor internal re-modelling work are not required to achieve the 35% reduction. If it is not technically feasible to achieve the target, and it cannot be achieved using on-site measures, then applicants will need to demonstrate and justify this as part of a planning application. A cash in lieu contribution to the Council’s Carbon Offset fund will be sought in cases where it is not technically feasible.

¹ https://www.richmond.gov.uk/sustainable_construction_checklist

² Part L 2021 of national building regulations took effect on 15 June 2022. However, the accompanying Part L software was not available and functional at that time. As of 1 January 2023, all planning applications submitted on or after this date will be required to follow the Greater London Authority’s Energy Assessment Guidance (2022) and spreadsheet. In the context of the London Borough of Richmond upon Thames, the requirements are that a 35% reduction in CO₂ emissions must be achieved over Building Regulations (2021), with all major developments required to be ‘zero carbon’.

4. Major Residential CO₂ emissions

From a total of 18 major residential permissions of 10 or more units analysed, 16 achieved the 35% reduction in regulated CO₂ emissions. Of the 2 permissions that did not meet the reduction target, 1 was new build and 1 was a conversion. The conversion at Richmond Royal Hospital (18/3950/FUL) was constrained by Listed Building and Building of Townscape Merit status and agreed to a carbon offset payment of £30,600. The new build at Queens Road Estate, Richmond (19/2404/FUL) achieved 32% and agreed to a carbon offset payment of £16,080.

Table 2: Percentage of major residential developments achieving a 35% reduction in regulated CO₂ emissions

	2017	2018	2019	2020	2021	2022	Total
35% reduction	100%	100%	50%	100%	67%	100%	89%
< 35% reduction	0%	0%	50%	0%	33%	0%	11%

Table 3: Number of major residential developments achieving a 35% reduction in regulated CO₂ emissions

	2017	2018	2019	2020	2021	2022	Total
35% reduction	4	2	1	3	2	4	16
< 35% reduction	0	0	1	0	1	0	2
Total	4	2	2	3	3	4	18

5. Minor Residential CO₂ emissions

From a total of 279 non-major residential developments analysed, 94% or 263 permissions, achieved the 35% reduction in regulated CO₂ emissions. Of the 6% (16 sites) that did not meet the reduction target, 11 were change of use or conversions, and 5 were extensions or mixed developments which are more likely to encounter constraints on the existing buildings. None of the 16 sites that failed to meet the 35% reduction in regulated CO₂ emissions were for new build developments; it is acknowledged that sites with existing buildings face more constraints in relation to CO₂ emissions reductions.

Table 4: Percentage of minor residential developments achieving a 35% reduction in regulated CO₂ emissions

	2017	2018	2019	2020	2021	2022	Total
35% reduction	95%	95%	95%	97%	91%	91%	94%
< 35% reduction	5%	5%	5%	3%	9%	9%	6%

Table 5: Number of minor residential developments achieving a 35% reduction in regulated CO₂ emissions

	2017	2018	2019	2020	2021	2022	Total
35% reduction	41	54	39	58	32	39	263
< 35% reduction	2	3	2	2	3	4	16
Total	43	57	41	60	35	43	279

6. Major non Residential CO₂ emissions

From a total of 10 major non-residential permissions analysed, 8 achieved the 35% reduction, and of the 2 that did not meet the target, the National Physical Laboratory (16/2409/FUL) was constrained by the design of advanced laboratories and agreed to a carbon offset payment, and Twickenham Stadium (16/2611/FUL) achieved 23% with a carbon offset payment.

Table 6: Percentage of major non-residential developments achieving a 35% reduction in regulated CO₂ emissions

	2017	2018	2019	2020	2021	2022	Total
35% reduction	33%	100%	100%	100%	100%	100%	80%
< 35% reduction	67%	0%	0%	0%	0%	0%	20%

Table 7: Number of major non-residential developments achieving a 35% reduction in regulated CO₂ emissions

	2017	2018	2019	2020	2021	2022	Total
35% reduction	1	2	2	1	1	1	8
< 35% reduction	2	0	0	0	0	0	2
Total	3	2	2	1	1	1	10

7. Minor non Residential CO₂ emissions

A total of 5 minor non-residential permissions did not meet the 35% reduction target. Kew Gardens (18/1696/FUL), Richmond Gate Hotel (18/2282/FUL), The Newhouse Centre, Hampton (17/0824/FUL) Gainsborough House, Richmond (19/2438/FUL) and Pembroke Lodge, Richmond Park (17/0263/FUL).

Table 8: Percentage of minor non-residential developments achieving 35% CO₂ reduction.

	2017	2018	2019	2020	2021	2022	Total
35% reduction	50%	80%	78%	100%	100%	100%	80%
< 35% reduction	50%	20%	22%	0%	0%	0%	20%

Table 9: Number of minor non-residential developments achieving 35% CO₂ reduction.

	2017	2018	2019	2020	2021	2022	Total
35% reduction	2	4	7	1	1	5	20
< 35% reduction	2	1	2	0	0	0	5
Total	4	5	9	1	1	5	25

8. Average reduction in CO₂ emissions

Table 10: Average % reduction in on-site carbon emissions in approved major developments

	2017	2018	2019	2020	2021	2022	Total
Average % reduction	33.9	31.6	34.5	36.0	38.0	39.5	35.5

Table 11: Average % reduction in on-site carbon emissions in approved minor developments

	2017	2018	2019	2020	2021	2022	Total
Average % reduction	37.2	36.7	37.5	36.7	35.6	36.8	36.8

9. Sustainable Construction Checklist Ratings

The checklist calculates an overall rating depending on the measures and levels incorporated into the development, and the type of development. Ratings may apply to either non-residential / residential refurbishment, or residential new build. Some developments will contain elements of both in one scheme with a different rating for each, for example a part new build, part conversion residential development may be rated higher on the new build element than the conversion element due to constraints on the existing buildings. Out of a total of 206 non-residential and domestic refurbishment checklists 83% were rated A+ to C, and 17% were rated as failing the requirements. Of the 198 residential new build checklists, 97% were rated A+ to C and 3% as failing. This reflects the constraints on change of use or refurbishment developments with existing buildings, some of which may be listed buildings or buildings of townscape merit. Whilst the Checklist endeavours to be applicable to as many development types as possible, it is recognised that not all the measures included will be appropriate for all types of development. This will be considered when reviewing the responses and the final score achieved.

Table 12: Ratings of Non-Residential and domestic refurbishment 2017 – 2022

	2017	2018	2019	2020	2021	2022	Total	%
A+	0	0	0	0	1	1	2	1%
A	1	1	1	1	0	0	4	2%
B	9	14	9	7	8	9	56	27%
C	17	25	22	19	13	13	109	53%
Fail	4	7	7	8	2	7	35	17%
Total	31	47	39	35	24	30	206	100%

Table 13: Ratings of Residential new build 2017 – 2022

	2017	2018	2019	2020	2021	2022	Total	%
A+	2	4	1	4	2	0	13	7%
A	4	8	8	1	4	8	33	17%
B	18	23	11	21	12	17	102	52%
C	14	10	8	5	5	2	44	22%
Fail	0	3	1	1	0	1	6	3%
Total	38	48	29	32	23	28	198	100%

Non-Residential and domestic refurbishment

Score	Rating	Significance
80 or more	A+	Project strives to achieve highest standard in energy efficient sustainable development
71-79	A	Makes a major contribution towards achieving sustainable development in Richmond
51-70	B	Helps to significantly improve the Borough's stock of sustainable developments
36-50	C	Minimal effort to increase sustainability beyond general compliance
35 or less	FAIL	Does not comply with SPD Policy

Residential new build

Score	Rating	Significance
81 or more	A++	Project strives to achieve highest standard in energy efficient sustainable development
64-80	A+	Project strives to achieve highest standard in energy efficient sustainable development
55-63	A	Makes a major contribution towards achieving sustainable development in Richmond
35-54	B	Helps to significantly improve the Borough's stock of sustainable developments
20-34	C	Minimal effort to increase sustainability beyond general compliance
19 or less	FAIL	Does not comply with SPD Policy

10. Sustainable Construction Checklist Measures

The Checklist covers a range of issues, from energy consumption to site accessibility. Not all of the measures will be appropriate for all types of development, but where they are stated as complying, they are enforced by planning condition. The following sections detail the scoring of the 400 checklists analysed against the various measures.

Energy use and pollution

11. Cooling

Of the 400 checklists analysed, 58% provided or improved insulation or incorporated living roofs and walls. 14% incorporated energy efficient heat demand and 12% reduced heat entering the building through shading. Less common elements included passive ventilation (8%) and exposed thermal mass (5%). Only 8 of the 400 checklists analysed included mechanical ventilation, and 4 incorporated Active cooling systems.

Table 14: Number of checklists incorporating cooling measures in schemes, by type of measure 2017 - 2022

	2017	2018	2019	2020	2021	2022	Total
Providing/improving insulation/living roofs and walls	35	57	36	31	20	22	201
Energy efficient design heat demand <= 15 kWh/sqm	3	10	9	16	8	4	50
Reduce heat entering a building through shading	16	10	3	6	1	6	42
Passive ventilation	4	2	9	5	4	3	27
Exposed thermal mass and high ceilings	4	5	1	3	1	2	16
Mechanical ventilation with heat recovery	3	1	1	2	0	1	8
Active cooling systems, i.e. ACU	2	0	1	1	0	0	4
Total	67	85	60	64	34	38	348

Table 15: Percentage of checklists incorporating cooling measures in schemes, by type of measure 2017 - 2022

	2017	2018	2019	2020	2021	2022	Total
Providing/improving insulation/living roofs and walls	52%	67%	60%	48%	59%	58%	58%
Energy efficient design heat demand <= 15 kWh/sqm	4%	12%	15%	25%	24%	11%	14%
Reduce heat entering a building through shading	24%	12%	5%	9%	3%	16%	12%
Passive ventilation	6%	2%	15%	8%	12%	8%	8%
Exposed thermal mass and high ceilings	6%	6%	2%	5%	3%	5%	5%
Mechanical ventilation with heat recovery	4%	1%	2%	3%	0%	3%	2%
Active cooling systems, i.e. ACU	3%	0%	2%	2%	0%	0%	1%

Sustainable Construction Checklist scoring for Heat Generation measures

Energy efficient design incorporating specific heat demand to less than or equal to 15 kWh/sqm	6
Exposed thermal mass and high ceilings	4
Reduce heat entering a building through shading	3
Passive ventilation	3
Reduce heat entering a building through providing/improving insulation and living roofs and walls	2
Mechanical ventilation with heat recovery	1
Active cooling systems, i.e., Air Conditioning Unit	0

Energy use and pollution

12. Heat Generation

Of the 400 checklists analysed, 224 incorporated individual heating and cooling, although this did not receive a score on the checklist. 10% connected to existing gas or electricity networks and 7% incorporated communal gas or electricity. Only 1 development of the 400 analysed appears to include a site wide combined heat and power (CHP) network from renewable energy, although it is thought that this may have been entered incorrectly.

Table 16: Numbers of Sustainable Construction Checklists incorporating heating measures in schemes, by type of measure.

	2017	2018	2019	2020	2021	2022	Total
Individual heating and cooling	32	64	42	44	21	21	224
Connection to existing networks gas or electricity	7	9	5	5	4	1	31
Communal gas or electricity	4	4	4	4	1	3	20
Communal renewable energy	2	2	0	4	4	4	16
Site wide CHP network - gas	3	2	3	1	0	1	10
Individual Heating/cooling powered by renewable energy	1	0	2	0	0	0	3
Connection to existing networks renewable energy	0	1	1	4	0	0	6
Site wide CHP network - renewable energy	0	0	0	0	0	0	0
Total	49	82	57	62	30	30	310

Table 17: Percentage of Sustainable Construction Checklists incorporating heating measures in schemes, by type of measure.

	2017	2018	2019	2020	2021	2022	Total
Individual heating and cooling	65%	78%	74%	71%	70%	70%	72%
Connection to existing networks gas or electricity	14%	11%	9%	8%	13%	3%	10%
Communal gas or electricity	8%	5%	7%	6%	3%	10%	6%
Communal renewable energy	4%	2%	0%	6%	13%	13%	5%
Site wide CHP network - gas	6%	2%	5%	2%	0%	3%	3%
Individual Heating/cooling powered by renewable energy	2%	0%	4%	0%	0%	0%	1%
Connection to existing networks renewable energy	0%	1%	2%	6%	0%	0%	2%
Site wide CHP network - renewable energy	0%	0%	0%	0%	0%	0%	0%

Sustainable Construction Checklist scoring for Heat Generation measures

Connection to existing heating or cooling networks powered by renewable energy	6
Connection to existing heating or cooling networks powered by gas or electricity	5
Site wide CHP network powered by renewable energy	4
Site wide CHP network powered by gas	3
Communal heating and cooling powered by renewable energy	2
Communal heating and cooling powered by gas or electricity	1
Individual heating and cooling	0

Pollution: Air, Noise and Light

13. Noise reduction

Local Plan Policy LP 10 (C) encourages good acoustic design to ensure occupiers of new and existing noise sensitive buildings are protected.

Table 18: Number of new developments that incorporate measures to reduce noise

	2017	2018	2019	2020	2021	2022	Total
SCC	68	93	62	73	46	58	400
Noise Reduction	32	51	28	30	21	18	180
Noise Reduction %	47%	55%	45%	41%	46%	31%	45%

14. Light Pollution

Local Plan Policy LP 10 (D) seeks to ensure that artificial lighting in new developments does not lead to unacceptable impacts.

Table 19: Number of new developments that have taken measures to reduce light pollution

	2017	2018	2019	2020	2021	2022	Total
SCC	68	93	62	73	46	58	400
Light Pollution Reduction	48	62	47	47	26	25	255
Light Pollution Reduction %	71%	67%	76%	64%	57%	43%	64%

Biodiversity

Local Plan Policy LP 15 encourages incorporating and creating new habitats or biodiversity features, including trees, into development sites and into the design of buildings themselves where appropriate; major developments are required to deliver net gain for biodiversity, through incorporation of ecological enhancements, wherever possible. The tables below detail the number and percentage of features and/or habitats incorporated in developments to improve on-site biodiversity.

15. Ecological enhancements

Table 20: Number of Sustainable Construction Checklists that incorporate ecological enhancements

	2017	2018	2019	2020	2021	2022	Total
Garden space	40	56	36	36	31	41	240
Additional planting to peripheral areas	31	38	30	29	15	24	167
Additional native/wildlife friendly planting peripheral areas	22	35	35	24	21	25	162
Green/brown roof	20	29	10	18	13	24	114
A living wall	3	13	3	6	3	9	37
Pond, reedbed or extensive native planting	4	5	8	2	4	3	26
Total	120	176	122	115	87	126	746

Table 21: Annual percentage of Sustainable Construction Checklists that incorporate ecological enhancements

	2017	2018	2019	2020	2021	2022	Total
Garden space	33%	32%	30%	31%	36%	33%	32%
Additional planting to peripheral areas	26%	22%	25%	25%	17%	19%	22%
Additional native/wildlife friendly planting peripheral areas	18%	20%	29%	21%	24%	20%	22%
Green/brown roof	17%	16%	8%	16%	15%	19%	15%
A living wall	3%	7%	2%	5%	3%	7%	5%
Pond, reedbed or extensive native planting	3%	3%	7%	2%	5%	2%	3%

16. Green roofs by type

Table 22: Percentage of Sustainable Construction Checklists that incorporate Extensive Green/Brown roofs

	2017	2018	2019	2020	2021	2022	Total
SCC	68	93	62	73	46	58	400
Extensive	13	21	4	10	9	19	76
Extensive %	19%	23%	6%	14%	20%	33%	19%

Table 23: Percentage of Sustainable Construction Checklists that incorporate Intensive Green/Brown roofs

	2017	2018	2019	2020	2021	2022	Total
SCC	68	93	62	73	46	58	400
Intensive	7	9	6	8	5	5	40
Intensive %	10%	10%	10%	11%	11%	9%	10%

17. Gain and loss of trees

Table 24: Number of Sustainable Construction Checklists that involve a gain or loss in the number of trees

	2017	2018	2019	2020	2021	2022	Total
SCC	68	93	62	73	46	58	400
SCC with Gain	7	18	16	7	5	10	63
SCC with Loss	9	10	13	7	6	12	57

Flooding and Drainage

18. Sustainable drainage measures

Policy LP 21 requires the use of Sustainable Drainage Systems (SuDS) in all development proposals. Applicants will have to demonstrate that their proposal complies 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 50% attenuation of the surface water runoff at peak times based on the levels existing prior to the development.

From April 2019, applicants are also required to complete a London Sustainable Drainage Proforma for all planning applications.

The checklists show that the use of infiltration techniques using porous surfacing materials is the most common SuDS measure at 30%, followed by the storage of rainwater for later use at 25%. The least common measures are the discharge of rainwater directly to a watercourse and the storage in ponds/open water features, which reflects the urban constraints of most sites.

Table 25: Number of Sustainable Construction Checklists that incorporate measures to mitigate the risks of flooding

	2017	2018	2019	2020	2021	2022	Total
Use of infiltration techniques	31	46	31	37	22	26	193
Store rainwater for later use	29	38	34	25	14	20	160
Discharge rainwater to surface water drain	24	29	16	23	14	16	122
Discharge rainwater to combined sewer	21	24	9	19	11	9	93
Store rainwater in tanks for gradual release	8	6	11	7	5	8	45
Discharge rainwater directly to watercourse	1	2	5	3	2	0	13
Attenuate rainwater in ponds/open water features	4	2	2	1	2	2	13
Total	118	147	108	115	70	81	639

Table 26: Percentage of Sustainable Construction Checklists that incorporate measures to mitigate the risks of flooding

	2017	2018	2019	2020	2021	2022	Total
Use of infiltration techniques	26%	31%	29%	32%	31%	32%	30%
Store rainwater for later use	25%	26%	31%	22%	20%	25%	25%
Discharge rainwater to surface water drain	20%	20%	15%	20%	20%	20%	19%
Discharge rainwater to combined sewer	18%	16%	8%	17%	16%	11%	15%
Store rainwater in tanks for gradual release	7%	4%	10%	6%	7%	10%	7%
Discharge rainwater directly to watercourse	1%	1%	5%	3%	3%	0%	2%
Attenuate rainwater in ponds/open water features	3%	1%	2%	1%	3%	2%	2%

Sustainable Construction Checklist scoring for sustainable drainage measures

Store rainwater for later use	5
Use of infiltration techniques such as porous surfacing materials to allow drainage on-site	3
Attenuate rainwater in ponds or open water features	4
Store rainwater in tanks for gradual release to a watercourse	3
Discharge rainwater directly to watercourse	2
Discharge rainwater to surface water drain	1
Discharge rainwater to combined sewer	0

19. BREEAM (Building Research Establishment Environmental Assessment Method)

New non-residential buildings over 100sqm floorspace, including change of use or conversion and extensions, should achieve the BREEAM 'Excellent' standard.

If the developer/applicant does not comply with the required BREEAM ratings, or where a development is unable to comply with the requirements set out in planning policy due to technical and financial feasibility, an independent external consultant will be instructed by the Council for an impartial view on the BREEAM assessment. The independent assessor is payable by the applicant prior to the assessment being carried out. The onus will be on developers to pay for any cost of independent assessment and provide robust evidence for not meeting the target.

Non-residential permissions

From a total of 34 non-residential permissions of over 100sqm floorspace with BREEAM pre-assessments, 56% achieved the BREEAM 'Excellent' rating with 19 planning permissions. A further 38% achieved the 'Very Good' standard of which 6 permissions were extensions, and 7 were new build.

Table 27: BREEAM ratings of non-residential permissions 2017 – 2022

	2017	2018	2019	2020	2021	2022	Total	%
Outstanding	0	0	0	0	0	0	0	0%
Excellent	3	5	4	2	1	4	19	56%
Very Good	2	5	5	1	0	0	13	38%
Good	1	0	0	0	0	0	1	3%
Pass	0	0	1	0	0	0	1	3%
Grand Total	6	10	10	3	1	4	34	100%

Residential permissions

Policy LP22 covering Sustainable Design and Construction states that proposals for change of use to residential will be required to meet BREEAM Domestic Refurbishment 'Excellent' standard where feasible. From a total of 120 residential permissions analysed, 75% achieved the Excellent standard.

Table 28: BREEAM ratings of change of use to residential permissions 2017 – 2022

	2017	2018	2019	2020	2021	2022	Total	%
Outstanding	0	0	0	0	0	0	0	0%
Excellent	16	16	16	13	15	14	90	75%
Very Good	3	4	2	7	1	4	21	18%
Good	1	3	1	1	1	2	9	8%
Total	20	23	19	21	17	20	120	100%