

# Barnet Local Plan EIP – Note on BREEAM and Building Regulations

## Reason for producing this note

On Day 9 (Wednesday 2<sup>nd</sup> November) at the hearing sessions, during consideration of Matter 8 – Design, Tall Buildings and Heritage, Inspector Philpott raised an issue with regards to CDH02 (Sustainable and Inclusive Design). This Note, including any resultant proposed modifications, should cover the following matters:

- Clarify justification for requirements of CDH02 (b) and (c), i.e. is reference to BREEAM necessary given updates to Building Regulations.
- Reference to BREEAM could be considered in this Note or the one on Building Regulations required for Matter 5

## Background

The Council refers to Notes EXAM 62 on Policy CDH02 Sustainable and Inclusive Design together with EXAM 70 on Policy ECC01 – Mitigating Climate Change.

The Council supports the use of Building Research Establishment Environmental Assessment Method (BREEAM), which is used to measure the environmental performance of non-residential buildings. BREEAM is the world's longest established method of assessing, rating and certifying the sustainability of buildings produced by Building Research Establishment (BRE). Implementing BREEAM on construction projects can vastly increase their sustainability compared to those that simply follow regulations. Projects that follow BREEAM specifications covered any additional costs by lower running costs during the building's life. Providing people in the UK with homes which are built in a highly sustainable manner may allow huge benefits that outweigh the costs for both of the residents and the wider population. (see e.g. Agha, A., Shibani, A., Hassan, D. H., & Salmon, A. (2020). *Building Research Establishment Environmental Assessment Methodology on the UK Residential Projects*. International Journal of Construction Engineering and Management, 9(6), 183-189. More generally, see also Briefing Paper '[The value of BREEAM](#)' by Eleni Soutli and David Leonard.<sup>1</sup>

Following submission of the Barnet Local Plan in November 2021 the Council in June 2022 produced a table of proposed modifications (EXAM 4). This document was produced after consideration of the Reg 19 soundness representations received, together with subsequent discussions with parties on the drafting of Statements of Common Ground. EXAM 4 includes proposed modifications to policies and supporting text pertaining to high quality design.

During the examination hearing session where Matter 8 was discussed, proposed modifications were considered, together with aspects of wording of policy and supporting text in the submission Plan. In light of that discussion, the Inspector has requested further clarification, explanation and justification of the matters detailed in this note. In the light of

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<sup>1</sup> <https://tools.breeam.com/filelibrary/Briefing%20Papers/BREEAM-Briefing-Paper----The-Value-of-BREEAM--November-2016----123864.pdf>

the foregoing, the Council now proposes a series of additional further modifications as set out below.

The following format has been used in this Note to denote further proposed modifications to the submission version of plan as revised by the proposed modifications listed in EXAM 4.

~~Strikethrough text~~ to indicate text proposed for removal.

Underlined text to indicate additional text.

## Considerations

EXAM 70 acknowledges that changes to the Building Regulations ie Part L 2021 – Conservation of Fuel and Power have come into effect since the Local Plan policies were drafted.

BREEAM ratings cover a broad range of sustainability criteria in a flexible points-based system. There is no direct relationship between achieving a BREEAM rating and meeting the GLA energy efficiency targets. However both aim to secure energy efficiency improvements and carbon reductions over those required by the Building Regulations Part L

The Council considers that it has 2 main options for assessing carbon reduction compliance going forward:

- First is to keep following the existing method of requiring a percentage reduction compared to a Part L notional building.
- Second is to use a more accurate measure which is a combination of metrics that consider energy efficiency (in terms of space heating demand), total energy use (Energy Use Intensity) and Renewable Energy (PV generation).

There is a potential move away from the comparison to Building Regulations Part L as a metric. This potential move away provides an extra reason to retain the BREEAM requirement. The Council considers that carbon reduction measures alone do not provide a full picture of overall environmental benefit. Therefore by utilising BREEAM the Council encourages a more holistic view of development proposals which accords with the Council and national objectives in terms of sustainability.

The GLA energy requirements inevitably focus more on residential matters, so having a range of measures to use as a lever for non-dwellings is considered beneficial.

The Council consider that although a BREEAM-based policy is not required to align with London Plan policy, and the Mayor has left it up to individual boroughs to determine if this is something appropriate to include as part of their Local Plans, the Council has chosen to do so to ensure that Commercial Buildings in the Borough are built to incorporate a high level of sustainability overall for the benefit of businesses and the environment. The Council notes that London boroughs with recently adopted local plans (LB Brent – Policy BSUI1, LB Lambeth – Policy EB4 and LB Southwark – Policy P69) have set standards for BREEAM.

## **Conclusion**

The Council considers that the BREEAM requirements remain relevant to the Plan and to ensuring that all new buildings in the Borough incorporate up to date sustainability across a broad range of criteria. No modifications are required.