

NETZEROHARINGEY



London Borough of Haringey

Explanatory Note: Energy Statement and Sustainability Assessment Information Requirements for Minor Developments

November 2025

Version 1

Why is this required?

Energy efficiency and sustainability are essential for creating buildings that are affordable, healthy, and future-ready. Minor developments are often once-in-a-generation opportunities to deliver homes and spaces that will serve occupants for decades. Ensuring high standards at the planning stage helps secure long-term benefits for occupants and the wider community.

This requirement supports the delivery of:

- Lower energy bills through efficient heating, cooling, and lighting systems
- Improved comfort and health for building users
- Resilience to rising energy costs and future climate impacts
- Reduced carbon emissions, contributing to Haringey's climate action goals
- Long-term sustainability, ensuring buildings are fit for the future

By embedding these principles early in the design process, developments can meet policy expectations while delivering meaningful outcomes for residents and the environment.

Which applications does this apply to?

This guidance applies to minor planning applications that:

- Create 1 to 9 new residential dwellings, or
- Create under 1,000 m² of new non-residential floorspace

This includes **new buildings** and **extensions** that result in new floorspace.

Energy Statements

Planning policy requirements

Under Haringey Local Plan Policy SP4, all developments are required to be zero carbon, meaning a 100% reduction in regulated carbon emissions compared to the Part L 2021 Building Regulations baseline.

Applicants must demonstrate this carbon reduction is achieved by following the **Energy Hierarchy**:

Be Lean: Maximise energy efficiency through a fabric-first approach and passive design measures. This includes high levels of insulation, effective ventilation, efficient glazing, and low-energy lighting.

Be Clean: Use low-carbon heat sources to meet space heating and hot water demand.

Be Green: Maximise on-site renewable energy generation, such as solar PV or heat pumps.

To comply with Policy SP4:

Residential developments	Non-residential developments
should aim to exceed the minimum 10% reduction in emissions under Be Lean.	should aim to exceed the minimum 15% reduction under Be Lean.
All new developments must achieve at least a 20% reduction in emissions from on-site renewable energy generation under Be Green.	

What information should be submitted?

Applicants must submit the following documents to support their Energy Statement:

1. Energy Strategy

The strategy must be prepared in line with **Part L 2021** and the **GLA Energy Assessment Guidance (2022)**. It should clearly report carbon savings using the following format:

Carbon Emissions Summary Table

Residential / Non-residential			
	Total regulated emissions (tonnes CO ₂ / year)	CO ₂ savings (tonnes CO ₂ / year)	Percentage savings (%)
Part L 2021 baseline			
Be Lean			%
Be Clean			%
Be Green			%
Cumulative savings			%
Carbon shortfall to offset (tCO ₂)			
Carbon offset contribution	£95 x 30 years x XXXX tCO ₂ /year = £		

2. SAP/BRUKL Output Sheets

These should be provided for both **Be Lean** and **Be Green** scenarios.

- Note: For **refurbishment projects**, the **Baseline scenario** must be modelled to represent the existing notional building. (See Appendix 3, GLA Energy Assessment Guidance 2022)

3. GLA Carbon Emissions Reporting Spreadsheet

A fully completed version of the **GLA spreadsheet** must be submitted in Excel format.

What should be modelled?

Applicants must provide a summary of input parameters used for energy modelling under the **Be Lean** and **Be Green** scenarios, compared against the **Part L 2021 Baseline**. This demonstrates how the proposed development improves energy performance and reduces carbon emissions in line with the Energy Hierarchy.

The table below provides an illustrative example of typical modelling inputs. These are **not prescriptive values** and should be tailored to the specific proposal by a qualified professional.

	Baseline	Be Lean	Be Green
U-values (efficiency of building elements)			
Floor u-value	Part L 2021 notional building specifications (W/m ² K)	0.10 W/m ² K	0.10 W/m ² K
External wall u-value		0.13 W/m ² K	0.13 W/m ² K
Roof u-value		0.10 W/m ² K	0.10 W/m ² K
Door u-value		1.30 W/m ² K	1.30 W/m ² K
Window u-value		1.30 W/m ² K	1.30 W/m ² K
G-value		0.40	0.40
Air permeability rate		3 m ³ /hm ² @ 50Pa	3 m ³ /hm ² @ 50Pa

Thermal bridging	Accredited Construction Details	Accredited Construction Details/ Bespoke Psi values	Accredited Construction Details / Bespoke Psi values
Ventilation			
Ventilation strategy	Natural ventilation with intermittent extract fans	Type (e.g. mechanical ventilation with heat recovery): Area(s) covered: Efficiency (%): Specific Fan Power (W/l/s):	Type (e.g. mechanical ventilation with heat recovery): Area(s) covered: Efficiency (%): Specific Fan Power (W/l/s):
Can the windows be used for ventilation?	Yes	Yes/No/Other	Yes/No/Other
Heating / cooling systems			
Heating system	Residential: Gas boiler and the notional efficiency figures (~89.5%) Commercial: Proposed heating system with notional efficiency figures. For example, when proposing heat pumps, notional efficiency of 286% for hot water and 264% for space heating.	Residential: Gas boiler and the notional efficiency figures (~89.5%). Commercial: Proposed heating system with notional efficiency figures. For example, when proposing heat pumps, notional efficiencies are 286% for hot water and 264% for space heating.	Residential: * Proposed heating system with actual proposed efficiency figure Commercial: * Proposed heating system with actual proposed efficiency figure.
Wastewater heat recovery (WWHR)	Yes	Yes	Yes (efficiency %)
Lighting			
Low energy lighting	100%	100%	100%
Photovoltaic (PV) system			
PV	Yes Part L 2021 notional building specifications (W/m ² K)	No PV **	Yes Proposed specifications of PV

* Direct electric heating systems are strongly discouraged under GLA guidance due to high energy bills and lack of on-site carbon savings.

** The GLA Carbon Emissions Spreadsheet applies notional PV savings to Be Lean outcomes to calculate final reductions.

Be Lean: Overheating Risk

What information should be submitted?

Minor applications must demonstrate how the Cooling Hierarchy, as set out in London Plan Policy S14 (Managing Heat Risk), has been followed to reduce internal overheating and limit reliance on active cooling systems.

Applicants should prioritise passive design measures and provide a clear explanation of how each stage of the Cooling Hierarchy has been considered in the proposal.

Applicants should prioritise all passive measures following the Cooling Hierarchy, incorporating passive measures into the design before considering further measures.

Cooling Hierarchy	Guidance:
1. reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure	<ul style="list-style-type: none"> • Avoid excessive glazing to limit solar gain • Use external shading (e.g. shutters, brise soleil) on elevations with direct sunlight • Internal blinds are less effective and not considered in Part O compliance, but may form part of a wider strategy • Consider building orientation, insulation, fenestration, and use of lighter-coloured, high-albedo materials and green infrastructure
2. minimise internal heat generation through energy efficient design	<ul style="list-style-type: none"> • Use energy-efficient appliances and lighting • Optimise layout to reduce heat-producing zones
3. manage the heat within the building through exposed internal thermal mass and high ceilings	<ul style="list-style-type: none"> • Incorporate exposed thermal mass (e.g. concrete floors or walls) • Use high ceilings to improve air circulation
4. provide passive ventilation	<ul style="list-style-type: none"> • Maximise openable window area for purge ventilation when outside temperatures are lower • Show openable windows on proposed elevations • Design layouts to encourage cross ventilation (e.g. dual or triple aspect units)
5. provide mechanical ventilation	<ul style="list-style-type: none"> • Mechanical Ventilation Heat Recovery (MVHR) system, if proposed, should have summer by-pass function • Ceiling fans
6. provide active cooling systems	<ul style="list-style-type: none"> • Strongly discouraged due to energy requirements and the impact on the urban heat island • If proposed, applicants must justify its use by demonstrating that all passive measures have been exhausted and active cooling is the only viable solution

Additional overheating considerations

Minor applications are **not required** to submit a **dynamic thermal overheating assessment** as part of the planning application.

Applicants are encouraged to complete and submit the [Good Homes Alliance \(GHA\) Early Stage Overheating Risk Tool](#). This tool provides a preliminary assessment of potential overheating risks based on design features and site context.

- If the tool identifies **medium or high risk**, applicants should consider design changes to reduce risk factors and strengthen passive mitigation measures.
- This early-stage assessment helps ensure that overheating risks are addressed proactively, avoiding costly redesigns later in the process.

As part of building control sign off for residential projects, compliance with [Part O \(Overheating\) of the Building Regulations](#) should be factored into the development's proposed design. Applicants are **strongly encouraged** to undertake this assessment before submitting the planning application to incorporate mitigation measures at an early design stage.

Details of the proposed low-carbon technologies under Be Green

Applicants must provide a summary table detailing the low-carbon technologies proposed under the **Be Green** scenario. These technologies should be modelled to demonstrate on-site carbon reductions in line with **Policy SP4**.

Note: The examples below are for illustration only and are not prescriptive. All specifications must be provided by a qualified professional.

Proposed renewable technologies	Type	Specification
Main space heating system*	e.g. air source heat pump	Please use this space to specify: <ul style="list-style-type: none"> • Individual or communal system • Energy source • Heating Seasonal Coefficient of Performance (SCOP) • Cooling Seasonal Energy Efficiency Rating (SEER), if applicable (only where Cooling Hierarchy has been followed)
Main domestic hot water system*	e.g. air source heat pump	<ul style="list-style-type: none"> • As above • Confirm whether the system meets 100% of domestic hot water demand
Solar photovoltaic (PV)**	Peak output (kWp)	
	Roof area covered (m ²)	
	Orientation and angle of PV panels	
	Renewable electricity produced per year (kWh/year)	
	Equivalent carbon reduction (tCO ₂ /year)	
	Battery storage capacity	
*These details should be based on manufacturer data sheets and specifications recommended by a qualified professional.		
** PV system sizing and performance must be assessed and specified by a qualified professional.		

Financial Contribution: Carbon Offset Requirement

Where developments do **not achieve 100% on-site carbon reduction**, the remaining emissions must be offset through a financial contribution.

Calculation Formula:

$$\text{Total Offset Contribution} = \text{£}95 \times [\text{tCO}_2/\text{year}] \times 30 \text{ years}$$

This contribution is secured through:

- A **Unilateral Undertaking (UU)** for most minor applications, or
- A **Section 106 legal agreement**, where appropriate

A template for the Unilateral Undertaking can be downloaded on our website.

Sustainability Statement

Planning Policy Requirements

Policy DM21 of the Development Management Document requires developments to demonstrate sustainable design, layout, and construction techniques. The Sustainability section in the report should set out the proposed measures to improve the sustainability of the scheme including:

Key Themes and Examples:

1. **Transport**
 - Provision of cycle storage and electric vehicle charging points
 - Promotion of sustainable travel modes through site layout and access
2. **Health and Wellbeing**
 - Good daylighting and ventilation for good indoor air quality
 - Access to outdoor amenity space or communal green areas
 - Use of non-toxic, low-Volatile Organic Compounds (VOC) materials
3. **Materials and Waste**
 - Use of recycled or locally sourced materials
 - Construction waste minimisation and recycling plans
 - Specification of materials with low embodied carbon
4. **Water Consumption**
 - Installation of low-flow fixtures and fittings
 - Use of rainwater harvesting or greywater recycling systems
5. **Flood Risk and Drainage**
 - Incorporation of Sustainable Drainage Systems (SuDS), such as permeable paving or green roofs
 - Site layout designed to manage surface water runoff
6. **Biodiversity and Urban Greening**
 - Tree planting, hedgerows, and native planting schemes
 - Living roofs and walls (excluding sedum-only systems)
 - Urban food growing areas or pollinator-friendly landscaping
7. **Climate Resilience**
 - Passive design measures to reduce overheating
 - Use of robust materials and systems to withstand extreme weather events
 - Incorporating cool areas for occupants
8. **Landscape Design**
 - Integration of green infrastructure into the site layout
 - Use of drought-resistant planting and habitat creation

Urban Greening and Biodiversity Net Gain

All development proposals must incorporate urban greening as a fundamental part of their design, in line with London Plan Policy G5. In addition, London Plan Policy G6 and Local Plan Policy DM21 require developments to manage biodiversity impacts and aim to deliver a biodiversity net gain.

Applicants should include high-quality, durable greening measures that contribute to London's biodiversity and help mitigate the urban heat island effect. These may include:

- Tree planting and native shrubs
- Hedgerows and pollinator-friendly planting
- Living roofs and walls (excluding sedum-only systems)
- Urban food growing areas

Note: Sedum-based living roof systems are discouraged as they are not native to the UK. Extensive green roofs should include a growing medium of **120–150mm depth** to support biodiversity.

Biodiversity Net Gain Calculation

Applicants must submit a biodiversity net gain calculation using the **Statutory Biodiversity Metric Calculation Tool**.

- Download the statutory biodiversity metric calculation tool.
- It is recommended to review the accompanying [user guidance](#) before completing the tool.

Sustainability - Non-Domestic BREEAM Requirement

Under Policy SP4, all new non-residential developments must achieve a minimum BREEAM rating of 'Very Good', with an aspiration to reach 'Excellent' where feasible.

Applicant must submit a **BREEAM Pre-Assessment** that includes:

- A breakdown of credits targeted, achieved, and not achieved
- Identification of credits available under Shell and Core assessments
- Justification for any credits not pursued or only partially met

This enables the planning authority to assess the sustainability performance of the proposal and identify areas for improvement. An alternative certification scheme can be considered to deliver the sustainability benefits.

Circular Economy

Under London Plan Policy SI7, developments must demonstrate how they promote a circular economy and aim to be net zero waste. Haringey Policy SP6 further requires proposals to minimise waste creation, increase recycling rates, and treat waste as a resource.

Applicants should outline measures such as:

- Designing for disassembly and reuse
- Specifying recycled or recyclable materials
- Reducing construction and demolition waste

Replacement Dwellings

Where a proposal involves demolition of an existing building, applicants must provide a robust justification. Improved energy efficiency alone does not justify the embodied carbon impact of demolition.

Applicants must demonstrate that full or partial retention of the existing structure has been thoroughly explored. This assessment should go beyond façade retention and consider options such as:

- Retaining structural elements (e.g. walls, floors, roof)
- Upgrading existing fabric to meet modern standards
- Reusing materials on-site

References:

[GLA Energy Assessment Guidance 2022](#)

[Haringey Local Plan: Strategic Policies](#)

[Good Homes Alliance \(GHA\) Early Stage Overheating Risk Tool](#)

[Biodiversity Net Gain](#)