BREEAM, Home Quality Mark and CEEQUAL Practitioner Guidance for Planning Professionals

Version 1.0
A suite of certification schemes recognised and valued by multiple stakeholders, both Nationally and Globally, which offer planning practitioners greater assurance of the delivery of higher quality, more sustainable development – better places for people and planet

- The schemes align to the ambitions of numerous planning drivers including para 130. of the NPPF (2019); to ensure quality is not materially diminished between permission and completion, as well as policies relating to climate resilience, public health, natural environment, transport, social value and more. This creates process efficiencies and maximises value.

- Certificates can be issued through a range of stages depending on the scheme. Only those building projects that have a ‘final’ certificate are able to provide the assurance that aspirations have been delivered on site.

- To achieve any rating, performance and delivery must be better than the regulatory baseline. A certified project, even to a ‘Good’ and/or 1 Star level, will be a better quality and more sustainable project than one meeting regulatory minimums.

- Approximately 70% of certified non-domestic buildings in the UK achieve a ‘Very Good’ rating with ‘Good’ and ‘Excellent’ being the next most common. The Outstanding/5 Star ratings represent the highest levels of performance and may not be suitable blanket standards. Local context should dictate aspiration.

- All projects are assessed by trained and licensed assessors/verifiers.

- Local policies utilising BREEAM assessment frameworks should be within an adopted, statutory planning document to increase visibility, credibility and the likelihood of certification.

- The schemes influence across the built environment life cycle including in operation which can be used to monitor policy impact and bridge gaps in performance.

- The scope and timings of different certification stages should be considered when writing conditions, obligations and/or other contractual tools. Final certificates are rarely issued prior to occupation.
What do you think of when you think of certification? A graduate holding up an embossed roll? A stamped jar of coffee? A car MOT? Or perhaps the padlock on a secure web browser? In all these cases, you would be right. Certification schemes are used by stakeholders in different markets as a way of providing assurance, driving standards and giving greater confidence in outcomes. They are typically applied to supply chain and/or management processes, actual operational performance and/or resulting process outcomes, or to the competencies of an individual and/or group. Those that certify, and who support certification, are sending a message to others that quality, credibility and execution matter to them.

The BRE’s Environment Assessment Method (BREEAM), the Home Quality Mark (HQM) and Civil Engineering Environmental Quality Assessment and Award (CEEQUAL) are a family of certification schemes operating across the entire built environment sector. They drive performance and standards, and support the delivery of added benefit for people, industry and society more widely.

A credible certification package consists of:

- **A standard and/or assessment framework** – a suite of performance indicators/criteria that the applicant must be able to demonstrate that they are meeting
- **An assessor/auditor** - a person or body independent from the applicant who will review the applicants submission against the assessment criteria
- **A knowledge base and training** - to support the stakeholders in the meeting the required standards, and with application submission and assessment.
- **An evaluation and update process** – to ascertain impact and ensure that the outcomes of the scheme are continuously driving best practice
- **A stakeholder strategy** – stakeholder engagement is key to ensuring sound governance, maximizing impact and overall client satisfaction.
- **Accreditation bodies** – organisations overseeing the development of the standard, the assessment process and providing overall quality assurance
The building sector’s environmental debates may have evolved from the oil crisis of the 1970s to today’s focus on low carbon construction and climate resilience, wellbeing, data and fourth industry transformation. However back in the 1980s ‘low energy’ buildings and the gap in credible measurements and standards was an emerging topic. It was during this time that the BRE was approached by a Canadian developer consortium operating in London who wanted a robust differentiator that could showcase the performance of their buildings. By the end of the decade BRE, in partnership with architects ECD and developers Stanhope Plc, launched the first BREEAM scheme for office buildings.

Today BREEAM is a family of schemes which drive standards across the entire built environment sector life cycle, and empowers those who deliver it.

The BREEAM Family includes:
- **BREEAM Communities**: for the master-planning of new communities
- **CEEQUAL**: for newbuild infrastructure and public realm projects
- **BREEAM New Construction**: for newbuild multi-residential and non-domestic buildings
- **Home Quality Mark**: for new homes
- **BREEAM Domestic Refurbishment**: for home refurbishments
- **BREEAM Refurbishment and Fit Out**: for multi-residential and non-domestic building fit-outs and refurbishments
- **BREEAM In-Use**: for existing buildings
Over the past 28 years, the BREEAM Family have supported and driven progress and innovation; providing confidence to stakeholders along the way. **To date, over 530,000 certificates have been issued and approximately 3,000 assessors licensed.** As the longest standing schemes, they have influenced the development of many other standards and assessment methodologies (within BRE and beyond) and have driven regulatory advancements at both national and international levels.

They are used to create value and capacity by a range of stakeholders including; end clients, building users, consumers, supply chains, financiers, developers, project teams and researchers. As well as local, national and international governments, and NGO’s.

**Now operational in over 80 countries they are the world’s leading sustainability certification schemes for the built environment.**

Further information specific to each scheme can be found in the associated resource packs aligned with this guidance.
Introducing the BREEAM Family cont.

Driving performance across non-domestic use types; education, commercial, retail, healthcare, multi residential, leisure, defence and security etc.

Maximising efficiencies and opportunities during refurbishment and operation; reducing the performance gap and optimising the existing stock.

Supporting better, higher quality homes for industry and consumers.

Engaging people with their built environment and empowering communities to thrive.

Improving public realm and infrastructure by reducing negative impacts and disruption whilst recognising good practice.
Sustainable Development and Planning Legislation

From the early 1970s the paradigm of sustainable development emerged as the catch-all for a wide range of governmental and non-governmental initiatives looking to balance different, and often competing needs with the environmental, social and economic limitations we face.

Unfortunately, the damage caused by single minded, short sighted unsustainable approaches are still seen today. From the large-scale financial crises caused by irresponsible banking, to changes in the world’s climate due to our fossil fuel-based economies. In fact, it can easily be said that climate change is now the biggest challenge facing our society today.

It was thought that to avoid the worst impacts of climate change, society needed to secure climate stabilisation at less than a 2°C global temperature increase above pre-industrial levels. This is the foundation of the UN Paris Agreement on climate change. However, the latest IPCC report (2018) indicates that 1.5°C is a more realistic target to avoid the worst extremes.

There are few now who dispute that sustainable development is a good and necessary policy focus. However after decades of debate on the issue, policy makers and action stakeholders are still seeking more tangible ways to deliver on the agenda.

Those within the Planning sector, Local Planning Authorities (LPAs) and other statutory bodies, are no exception.

LPAs have a responsibility to secure progress against the UK’s emissions reduction targets outlined within the 2008 Climate Change Act. They are bound by the legal duty set out in S.19 of the 2004 Planning and Compulsory Purchase Act, as amended by the 2008 Planning Act, to ensure that, taken as whole, plan policy contributes to the mitigation of, and adaptation to, climate change.

Other legislative drivers include the Planning and Energy Act (2008) (which supports building level energy efficiency and ‘Merton Rule’ style policies), the Flood and Water Management Act (2010) (charging flood authorities with ensuring preliminary flood risk assessments are acted upon) and the environmental requirements outlined in the 2017 UK EIA Regulations.

The BREEAM Family can assist the planning profession in meeting these obligations; reducing carbon and delivering more sustainable development outcomes.
The National Planning Policy Framework (NPPF)

The NPPF (2019) outlined a legal interpretation of the development plan framework as the need for local authorities to determine their areas’ strategic priorities within a ‘Strategic Plan’ and by proposing that more detailed Local Plans may be developed at discretion. Paragraph 20. details the minimum strategic priorities and includes action on climate change and the protection and enhancement of the natural environment.

There is also rhetoric throughout which galvanises LPAs to radically reduce carbon emissions (para 148. for e.g.), support public health and ensure that high quality, well designed places are brought forward.

Paragraph 130. makes explicitly clear that development of poor design, which fails to capitalize on opportunities for improving character, quality and take account of local design standards, should be refused.

It goes on to direct planning authorities to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).

Paragraph 131. also charges planners with placing great weight on designs which promote high levels of sustainability (as appropriate to local context).

Whilst para 129. specifically promotes the use of assessment frameworks and design review tools.

BREEAM, HQM and CEEQUAL encompass, and go beyond minimum strategic priorities addressing issues relating to health, materials, waste, water etc., whilst the certification process provides greater assurance that the agreed level of quality and sustainability is delivered at completion.
In 2015 the Housing Standards Review (HSR) reported, and Government announced, a number of interventions which included the winding down of the Code for Sustainable Homes alongside changes to planning powers which would prevent LPAs from setting energy efficiency standards beyond the regulatory minimum.

The Merton rule and non-domestic buildings were exempt from the proposals.

In that same year Eric Pickles, in a Written Ministerial Statement (WMS 2015), advised planners not to set requirements for higher standards in new homes with the exception of those relating to energy performance equivalent to a 19% emission reduction improvement on the TER of Part L (2013) building regulations (equivalent to the Code level 4 minimum carbon improvement requirement) ‘until commencement of amendments to the Planning and Energy Act 2008’.

The amendments to the Planning and Energy Act 2008 were to be through the 2015 Deregulation Act which industry expected to be enacted at the same time that the Zero Carbon Homes 2016 policy saw an increase in the emission reduction requirements intended to be set out in a revision to Part L.

After the 2015 General Election, the Government paused the Zero Carbon policy in order to give the housing market some ‘breathing space’ and, to date, the relevant section of the Deregulation Act has not been enacted.

More detailed writings are available via the UKGBC ‘Policy Playbook’, The Merton Rule - An APSE Energy Publication and the TCPA’s/RTPI’s ‘Rising to the Climate Crisis’

Central policy narratives since, such as the BEIS Clean Growth Strategy, have clearly signalled a desire to address built environment emissions and quality, and a resurgence of activity has begun which is expected to accelerate and includes the revision of the Part L building regulations.

In addition, the recent reissue of the PPG on Climate Change (15th March, 2019) makes clear that LPA’s "can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes"

As such, there is ‘space’ for LPA’s to drive sustainability standards across all new building development and utilise assessment frameworks, such as BREEAM and the HQM, to do so.
Reforms are underway in Scotland to ensure that the planning system realises its full potential as part of 2018/19 business development plan, and that it plays its key role in delivering Scotland’s economic strategy.

The aim is to strengthen the system’s contribution to inclusive growth, housing and infrastructure delivery and empowering communities. As well as incorporating Scottish Planning Policy (SPP) into the National Planning Framework (NPF)

The Planning (Scotland) Bill is central to achieving this, and the role of, and need for Local Development Plans and Strategic Development Plans is under review. The Local Government and Communities Committee have produced a stakeholder guide (Nov 2018) to the amendments that have been considered. Following parliamentary scrutiny of the Bill, secondary legislation and guidance will be introduced to support amendments.

The final policy landscape is to be decided however certification will continue to be a valuable planning tool, helping Scotland to ensure that its ambitions can, and will be delivered.
A common question asked is which rating to set and deliver to? This is a challenging question to answer. All ratings are better than the regulatory minimum and the final rating achievable will depend on the socio-economic context and localised, project specific conditions. To a certain extent, this can include project location i.e. rural vs urban, the existing infrastructure and/or the density of the built form. However assessment criteria allow for variances in contexts and the flexibility of the credit score card offers considerable scope for project teams to deliver ‘better’.

Planners however must understand the local ambition and need (in the context of both National and local need), determined by the local evidence base, including assessments of viability, before setting a rating.

The schemes address a range of strategic policy issues. As such, surveys carried out to support the evidence base for such policies, including for those relating to climate resilience (flood risk, heat stresses etc.) and for the protection and enhancement of the natural environment, as well as air quality and wider public health issues such as active travel, water resource management, waste etc., could be extended to the certification/rating evidence base.

Furthermore, LPAs should work collaboratively to stipulate levels that complement ambitions set out across neighboring boroughs.

This optimizes the costs of investigative works, pools skills and resources, and ensures developers encounter consistency amongst districts and other delivery agencies.

To help provide a ball-park for ratings however, the graph overleaf shows how the ratings are set in comparison to industry practice.

The most common ratings are those comparative to an Excellent/4 star, Very Good/3 star and Good/2 star – nearly 70% of 2014 New Construction certificates have been rated ‘Very Good’.

The levels of performance between each rating are not equally incremental i.e. it is more challenging to go from a Very Good to Excellent, than a Good to a Very Good. Furthermore, the Outstanding/5 Star ratings are immensely challenging. A small proportion of projects achieve them and, in the absence of a developer volunteering it, careful consideration should be given if/when setting ambitions for this top level of performance. In most cases, they will not be appropriate for blanket policy.
Scheme ratings broadly represent performance equivalent to:
- Pass/1 Star: Top 75% of projects (standard good practice)
- Good/2 Star: Top 50% of projects (intermediate good practice)
- Very Good/3 Star: Top 25% of projects (advanced good practice)
- Excellent/4 Star: Top 10% of projects (best practice)
- Outstanding/5 Star: Less than the top 1% of projects (innovator)
It may be appropriate to set different rating levels by development type and/or local priority. For example, in the case of the HQM, LPAs could use the different scoring elements (i.e. stars and performance indicators) to support priority areas and with different levels for non-residential/public realm/refurbishment.

It is not uncommon for LPAs to set different ratings based on floor area and/or unit number although development size should have less of an influence over the potential rating which can be achieved than say viability/development need and local priority.

Ambiguous and/or complicated policies should be avoided and a flexible approach can enable higher standards to be met in the instance where project viability is stronger whilst ensuring a minimum standard is met across the board.

<table>
<thead>
<tr>
<th>Development Type</th>
<th>Scale</th>
<th>2020-2028</th>
<th>2029-2035</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Homes</td>
<td>10-200 dwellings</td>
<td>HQM 3 stars</td>
<td>HQM 4 stars</td>
</tr>
<tr>
<td></td>
<td>&gt;200 dwellings</td>
<td>HQM 4 stars OR HQM 3 star +level 4 on the Footprint Quality Indicator</td>
<td></td>
</tr>
<tr>
<td>New and Refurbished Non-Residential</td>
<td>1,000-5,000m²</td>
<td>BREEAM Very Good</td>
<td>BREEAM Excellent</td>
</tr>
<tr>
<td></td>
<td>&gt;5,000m²</td>
<td>BREEAM NC/RFO Excellent</td>
<td></td>
</tr>
<tr>
<td>New Communities</td>
<td>&gt;200 dwellings</td>
<td>BREEAM Communities Excellent</td>
<td></td>
</tr>
<tr>
<td>Residential Refurbishment</td>
<td>&gt;10 dwellings</td>
<td>BREEAM Domestic Refurbishment Excellent</td>
<td></td>
</tr>
<tr>
<td>Public realm</td>
<td>Major works</td>
<td>CEEQUAL Very Good</td>
<td>CEEQUAL Excellent</td>
</tr>
</tbody>
</table>
It may also be appropriate to set different rating levels according to the assessment type. The BREEAM UK New Construction and Refurbishment and Fit-out schemes cover ‘Fully fitted’, ‘Shell and core’ and ‘Shell only’ assessments types. The assessment type is determined by the scope of the project, as follows:

- **Shell only**: where the developer’s scope of works covers new-build works to the fabric, substructure and superstructure of the building, including:
  - External walls, windows, doors (external), roof, core internal walls, structural floors
  - Hard and soft landscaping areas

- **Shell and core**: The scope covered by shell only in addition to core building services.

- **Fully fitted**: The scope of shell and core, plus the internals are fully fitted out.

Further scheme specific detail can be found in the associated scheme resource packs twinned with this guidance.
When considering an existing policy and whether or not to increase a rating, planners should note that BRE cyclically reviews and updates schemes.

As such, the Excellent rating within BREEAM: New Construction 2018 can be more challenging than the Excellent rating within BREEAM: New Construction 2014 and so forth.

This ensures that the schemes are continuously driving standards and performance, and are aligned to National/Global commitments such as the Paris 2020, the SDGs and the carbon budgets etc.

Typically, when a new scheme is launched, the industry goes through a period of adjustment. This then settles as BREEAM professionals and the market familiarize with the requirements and integrate performance criteria into their business as usual. For example, challenges could occur when a policy requirement for a Very Good rating increases to an Excellent at a similar time to a new scheme launch which may cause the local expectation to increase two fold.

Details of the update cycles and consultations are available on the BREEAM, CEEQUAL and HQM website and BREEAM professionals are regularly consulted during scheme updates. However if unsure please contact BRE directly when forming your evidence base/submitting plans to enquiry.
Continually driving standards over time by raising the performance bar within the criteria and associated ratings.
As such, whilst it is common practice to support Strategic/Local Plan policies with Supplementary Planning Documents and other policy tools, any policy relating to sustainable buildings and certification must be subject to examination and inspection to increase visibility, early integration and validity.

Planning Authorities must ensure that their requirements for BREEAM, HQM and CEEQUAL are clearly outlined within the statutory Strategic/Local Plan.

To date, the most significant barriers to effective scheme integration and therefore attainment of the upper ratings is timing, continuity and commitment.

The sustainability potential of a project can be most effectively realized, and return the most value when considered early on in the thinking and if it is 'owned' by the project team.

Furthermore, where a condition to build to BREEAM/HQM/CEEQUAL is not supported by an adopted Strategic/Local plan (or put forward as a viable option by the applicant), it may be successfully challenged.

Similar requirements imposed with reference to adopted policies have been upheld by the planning inspectorate and, conversely, removed when not.
Typically, the BREEAM Family are found within the carbon and climate resilience sections of a local plan as a means of demonstrating compliance with associated climate change policies or to drive and determine good water management practices. This is a strong and appropriate policy alignment.

However the schemes are holistic, addressing a wider range of issues drawing upon the latest thinking from the respective sectors. LPAs could better showcase, and leverage certification by determining compliance with a range of other relatable policies.

For example, a Strategic Plan must contain policies which address climate change adaptation and resilience, and the ‘conservation… of the natural, built and historic environment’ (p9, para 20 NPPF, 2019).

While a more detailed Local Plan, in addition to the strategic policies, may also contain objectives which align to healthy and safe communities and sustainable transport.

The schemes align with all of these agendas and include criteria which supports car independency, access to amenities, air quality and healthy buildings/public realm more generally.

To bring this to life, the Strategic Ecology Framework which underpins the natural environment criteria across all schemes, has recently been updated following a two year consultation with industry. The latest in ecological best practice therefore, is now available to LPAs to be channeled into development through the vehicle of certification.

LPAs and developers can use certification as a ‘fast track’ means of demonstrating compliance against a broad suite of policies; such as the natural environment and health, in addition to those related to climate mitigation and resilience.
“The planning system is charged with delivering positive social–economic and environmental outcomes, maintaining high levels of design quality and generally having to do more with less. However one of the greatest challenges that we all now must face is that of climate change. The scientific evidence is overwhelming with the latest IPCC report making clear that we have now entered a period marked by unprecedented climatic instability. This impacts across the key issues of today from fuel poverty, public health and social justice, to those of economic prosperity. As an industry, we must act decisively.

Happily, this is now easier than it ever was with mitigation and adaptation solutions dramatically reducing in cost. For example, the cost of onshore wind has fallen by 23% since 2010 whilst the cost of solar photovoltaic electricity has fallen by 73%. However, our studies suggest that local plans are not dealing with carbon emission reduction effectively, nor are they consistently delivering the actions necessary to secure the social and economic resilience of communities. Why is this the case?

There are complex reasons for this ranging from perceived contradictions in national policy, to the priority given to housing allocations and the cases of Inspectorates finding plans not meeting climate change policy requirements sound. Underlying all of this however is a crisis in resources in the local planning service.

What the BRE are offering in the form of their certification schemes; BREEAM, HQM and CEEQUAL are nationally recognised, industry respected toolkits accessible to all planning practitioners to use in driving better development outcomes. Outcomes which respond not only to the climate crisis but also a broader suite of sustainability issues, and which offer an additional layer of assurance in the form of a third party assessed certification process.

We urge planners to take up these schemes in policy as and where appropriate. It will only be those places that can demonstrate resilience which will secure the investment and type of development the nation so desperately needs.”
All development types and locations have the ability to integrate sustainability into their design, construction and management to some degree. BREEAM, HQM and CEEQUAL have the flexibility to deal with localised challenges whilst maintaining a consistent national approach to better practices. However there may be occasions when the policy ratings will need to be examined with the project team in order to achieve the right outcome overall. LPA’s and developers should work together in these instances. Early stage discussions are a crucial element of success.

Qualified BREEAM professionals can assist and are involved at different stages of the scheme application and assessment process as outlined to the right. However these roles can vary by scheme and, in the case of CEEQUAL, it is the ‘Verifier’ who acts in the third party capacity.

The typical roles of qualified BREEAM professionals:

**The Licensed Assessor (or Verifier):** has individual, scheme specific training and experience. They are able to competently undertake assessments of projects/assets, determine ratings and apply for certification based on the scheme license they hold. They ensure the validity of the rating and realise the value of certification for the client/project and future asset owners and users. The Assessor (or Verifier) is involved throughout the different stages of assessment process – the earlier the better.

**The Advisory Professional (AP):** an individual with a high level of general knowledge of scheme specific principles, requirements and processes. They have the skills and experience needed to inform, guide and facilitate project teams through the certification process. The AP can support stakeholders in obtaining maximum value and cost-effective performance throughout the project life, whilst managing risks and keeping performance on course to achieve the targeted rating.

**The Associate:** An individual with a general understanding of the principles and processes of the scheme(s). Associates are generally a member of the project team and/or relevant stakeholder group and can apply their generalist knowledge before, during or after the assessment process.

Licensed assessor and/or advisory professionals can be found at [www.greenbooklive.com](http://www.greenbooklive.com) which is searchable by area and scheme.
The assessment process for new construction and refurbishment schemes involves several stages which correlate to the planning process as follows:

**Pre-Assessment Estimator**
- Shows what rating the project has potential to achieve, typically based on the planning submission and developer commitments. Not part of formal certification.
- Planners should look for an output of the tool supported by a BREEAM professional.

**Registration**
- Once registered with BRE, the project is secured to the latest version of the applicable scheme. If a scheme updates before certification has been achieved, the project has a designated amount of time to certify. Projects can move up scheme version but not down.

**Interim/Design Stage Certification**
- A third party assessed and verified element of the formal certification process based mostly on design stage evidence; specifications, contracts, etc. It is an optional, but recommended stage of the certification process.

**Final/Post Construction Certification**
- The final stage of the process which is the most robust. It is third party assessed and verified, and based on constructed, as built evidence.

The Certification Process, Actors and Timescales cont.
BREEAM in Use

The BREEAM in Use scheme also involves pre-estimator and registration stages however the assessment and certification is divided across 3 areas of scrutiny which can be assessed together or independently:

- Part 1 Asset Performance – measuring the performance of the assets built form, construction, fixtures, fittings and installed services
- Part 2 Building Management - the operations and management of the asset
- Part 3 Occupant Management - the management of building users and services within the building (currently for offices only)

Newly constructed buildings can undertake BREEAM in Use assessments after two years of operation.

UK New Construction - Occupation Stage Assessment

To help bridge the gap between project design and actual performance in operation, the BREEAM UK NC scheme has recently introduced the Occupation Stage Assessment (OSA). This is an optional third stage of assessment and confirms the process of monitoring, reviewing and reporting on the performance of the building once occupied.

It is carried out a minimum of 12 months after occupation and typically before a period of two years has lapsed from the date of ‘full’ occupation (defined as occupation of approximately 80% of the occupiable space in the building).

This stage focuses on best practice project commissioning, handover and post-occupation support and will help planners, policy makers, design teams, building owners and other stakeholders understand the actual performance of the building, and create opportunities to optimise attributes in line with the design expectations.

The OSA is only applicable to fully fitted and shell and core assessments, and can be used by planners in combination with BREEAM in Use to better assure quality and respond to paragraph 130. of the NPPF (2019).

CEEQUAL

Due to the uniqueness of projects typically assessed under the CEEQUAL scheme, the assessment process is more fluid and flexible. However evidence is collated throughout the delivery process, typically by a project team member, which is ‘Verified’ and then ‘Ratified’ at a given stage depending on the scope of the assessment.
LPAs should consider the typical certification timings when writing policy and conditions. Interim building certificates are often achieved once projects are into the construction stages with **final certification typically occurring 3-6 months post completion.**

BREEAM Communities certificates are issued during the design phases whilst CEEQUAL assessments can be project and scope specific.

Conditions that require final certificates to be submitted to the LPA before occupation may be altered or removed if challenged.
Arguably the greatest value to be gained from using BREEAM schemes is via the final certification process. This reviews the specification which has actually been built and can be used by planning authorities to ensure performance delivery and also as a part of their annual monitoring and reporting as a simple ‘number of certificates issued’ KPI to demonstrate policy impact.

To navigate ambiguity in the commitments and/or aspirations that may (or not) be submitted within the planning application, conditions and obligations can be used to secure certification.

Where it is practicable to do so, conditions should be discussed with the applicant before permission is granted to ensure that unreasonable burdens are not being imposed.

When determining the required rating, consider the scope of works associated with the project. Some assessment types may have certain characteristics making a high rating challenging to achieve, or considerably more expensive than others.

For example, a small retail space, assessed as a shell & core project and located on the ground floor of a residential development, might find it difficult to achieve a high rating, as some decisions are made centrally for the wider development and are unlikely to be influenced by a relatively small retail project. In this case, characteristics like the building orientation or the use of low and zero carbon technologies might be beyond the remit of the retail assessment.

A flexible approach to setting rating benchmarks can support in ensuring the most sustainable outcome is achieved within the remit and scope of the developers works.

Furthermore, all conditions requiring discharge prior to construction must be agreed by the developer in writing. Conditions that unnecessarily affect an applicant’s ability to bring a development into use, allow a development to be occupied or otherwise impact on the proper implementation of the planning permission, should not be used.
The [or insert project ref] shall achieve a Final BREEAM/HQM Level [state level] in accordance with the requirements of the relevant BREEAM/HQM scheme.

The project’s Final Certificate must be issued to the local planning authority within a maximum of 6 months post completion.

In addition, robust evidence of the building(s) potential to achieve the stipulated Final Level must be submitted to the local planning authority before commencement of work on site (for instance by submitting a pre-assessment estimator completed by a licensed and fully contracted BREEAM/HQM assessor or the Interim stage certificate), as well as evidence that the development is registered with the certification body.

This examples relates to building projects. For CEEQUAL Awards, please contact enquiries@ceequal.com for condition wording advice, or breeam@bregroup.com in relation to BREEAM Communities.

Requesting certification prior to construction works will require written consent from the developer. However this offers an intervention point at which the accountability for certified performance can be integrated and not forgotten later in the delivery process.
Essex is planning for 180,000 new homes. The Essex Design Guide (EDG) was recently updated by Essex County Council, the Essex Planning Officers Association and 30 different organisations including BRE. The HQM is embedded to recognise quality across several aspects, two of which are highlighted below.

EDG health and wellbeing requirements aligned with HQM criteria for daylight, air quality, green spaces and other health issues.
“Moving the quality agenda forward in Essex is very important to ensuring we can create great places and quality new developments. It has been invaluable to work with BRE on this journey and in shaping the Essex Design Guide. BRE have brought good insight and knowledge, and through HQM we see this as being really important to helping to drive up quality standards. HQM also provides local people with the ability to differentiate the quality of the new homes built.”

Graham Thomas, Chairman of the Essex Planning Officers Association and Head of Planning, Essex County Council
Development is expected to contribute to addressing climate change through low/zero carbon design which improves the energy efficiency of both new and existing buildings and/or provides low or zero carbon energy.

Development proposals will be granted planning permission where:

1. They achieve the following reductions in CO₂ emissions in line with the energy hierarchy:
   a) For new non-residential (including multi residential) – a reduction in CO₂ emissions of [insert]; or
   b) For new build residential - a reduction in CO₂ emissions of [insert] of the Dwelling Emission Rate (DER) compared to the Target Emission Rate of Part L of the Building Regulations (2013);
   AND

2. Achieve final certification against the Building Research Establishment’s Environmental Assessment Method (BREEAM), Home Quality Mark (HQM) and/or CEEQUAL (or equivalents) as indicated in table xx below:

Projects will be expected to aspire beyond these ratings where possible to do so as determined by the submission of a pre-assessment estimator output at the initial planning submission stage. For building projects, both interim/design stage and final stage certificates will be expected to be submitted at appropriate stages as agreed between the authority and the applicant but with the final certification no later than 6 months post completion.

Furthermore, due to the holistic nature of the BREEAM schemes, compliance with relatable policies within this plan may also be considered as met. These are also outlined within table xx.
### Table xx – Sustainability and quality performance requirements, and equivalence policies

<table>
<thead>
<tr>
<th>Development Type</th>
<th>Scale</th>
<th>2020-2028</th>
<th>2029-2035</th>
<th>Equivalence policies</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Homes</td>
<td>10-200 dwellings</td>
<td>HQM 2 Stars</td>
<td>HQM 3 Stars</td>
<td>SD 3 – Water management</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td>SD 8 – Flood Risk ST 2 – Sustainable Transport</td>
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<tr>
<td></td>
<td>&gt;200 dwellings</td>
<td>HQM 3 stars OR HQM 2 star and level 4 on the Footprint Quality Indicator</td>
<td></td>
<td></td>
</tr>
<tr>
<td>New and Refurbished Non-Residential</td>
<td>1,000-5,000m²</td>
<td>BREEAM Good</td>
<td>BREEAM Very Good</td>
<td></td>
</tr>
<tr>
<td></td>
<td>&gt;5,000m²</td>
<td>BREEAM NC/RFO Very Good</td>
<td></td>
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</tr>
<tr>
<td>New Communities</td>
<td>&gt;200 dwellings</td>
<td>BREEAM Communities Very Good</td>
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<tr>
<td>Residential Refurbishment</td>
<td>&gt;10 dwellings</td>
<td>BREEAM Domestic Refurbishment Excellent</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Public realm</td>
<td>Major works</td>
<td>CEEQUAL Very Good</td>
<td>CEEQUAL Excellent</td>
<td></td>
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</tbody>
</table>
## Appendix 2 – Local policy references

This list represents a sampled snap shot of the current policy landscape. It is intended as a guide for those seeking further information. Each Local Authority policy is hyperlinked. The intention is to regularly update and build on this insight. We welcome contributions to the data set and look forward to working with you to develop this piece further.

<table>
<thead>
<tr>
<th>Planning Authority</th>
<th>Current or Emerging</th>
<th>Adoption Stage</th>
<th>Certification policy overview</th>
</tr>
</thead>
<tbody>
<tr>
<td>Basildon</td>
<td>Emerging</td>
<td>Draft</td>
<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>Birmingham</td>
<td>Current</td>
<td>Adopted 2017</td>
<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>Camden</td>
<td>Current</td>
<td>Adopted 2017</td>
<td>BREEAM: New Construction, BREEAM: Domestic Refurbishment, HQM</td>
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<tr>
<td>Canterbury</td>
<td>Current</td>
<td>Adopted 2017</td>
<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>Central Bedfordshire</td>
<td>Emerging</td>
<td>Submitted Apr 2018</td>
<td>BREEAM: New Construction, HQM</td>
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<tr>
<td>Chelmsford</td>
<td>Emerging</td>
<td>Submitted Jun 2018</td>
<td>BREEAM: New Construction</td>
</tr>
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<td>Cheshire East</td>
<td>Current</td>
<td>Adopted 2017</td>
<td>BREEAM: New Construction and CEEQUAL</td>
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<tr>
<td>Colchester</td>
<td>Emerging</td>
<td>Submitted Oct 2017</td>
<td>BREEAM: New Construction, HQM</td>
</tr>
<tr>
<td>Croydon</td>
<td>Current</td>
<td>Adopted 2018</td>
<td>BREEAM: New Construction, BREEAM: Domestic Refurbishment, BREEAM: Communities</td>
</tr>
<tr>
<td>Derby</td>
<td>Current</td>
<td>Adopted 2017</td>
<td>BREEAM: New Construction, BREEAM: Communities</td>
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<tr>
<td>East Herts</td>
<td>Current</td>
<td>Adopted 2018</td>
<td>BREEAM: HQM</td>
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<tr>
<td>Eastleigh</td>
<td>Emerging</td>
<td>Submitted Nov 2018</td>
<td>BREEAM: New Construction and BREEAM: Communities</td>
</tr>
<tr>
<td>Greenwich</td>
<td>Current</td>
<td>Adopted (updated) 2016</td>
<td>BREEAM: New Construction, BREEAM: Domestic Refurbishment, CEEQUAL</td>
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<tr>
<td>Harrogate</td>
<td>Emerging</td>
<td>Submitted Aug 2018</td>
<td>BREEAM: New Construction, HQM</td>
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<tr>
<td>Planning Authority</td>
<td>Current or Emerging</td>
<td>Adoption Stage</td>
<td>Certification policy overview</td>
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<td>------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Havant</td>
<td>Emerging</td>
<td>Draft</td>
<td>BREEAM: New Construction, BREEAM: Communities, HQM</td>
</tr>
<tr>
<td>Luton</td>
<td>Current</td>
<td>Adopted 2017</td>
<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>Maldon</td>
<td>Current</td>
<td>Adopted 2017</td>
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</tr>
<tr>
<td>New Forest</td>
<td>Emerging</td>
<td>Submitted Nov 2018</td>
<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>North Devon and Torridge</td>
<td>Current</td>
<td>Adopted 2018</td>
<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>Oxford</td>
<td>Emerging</td>
<td>Draft</td>
<td>BREEAM: New Construction, HQM</td>
</tr>
<tr>
<td>Plymouth and South West Devon Joint Local Plan</td>
<td>Emerging</td>
<td>Submitted Jul 2017</td>
<td>BREEAM: New Construction (Plymouth only)</td>
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<tr>
<td>Poole</td>
<td>Current</td>
<td>Adopted 2018</td>
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</tr>
<tr>
<td>Reading</td>
<td>Emerging</td>
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<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>Richmond</td>
<td>Current</td>
<td>Adopted 2018</td>
<td>BREEAM: New Construction, BREEAM: Domestic Refurbishment</td>
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<td>Sedgemoor</td>
<td>Emerging</td>
<td>Submitted Aug 2018</td>
<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>South Cambridgeshire</td>
<td>Current</td>
<td>Adopted 2018</td>
<td>BREEAM: New Construction, BREEAM: Refurbishment Fit Out, BREEAM: Communities</td>
</tr>
<tr>
<td>Stockton</td>
<td>Emerging</td>
<td>Submitted Dec 2017</td>
<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>Sutton</td>
<td>Current</td>
<td>Adopted 2018</td>
<td>BREEAM: New Construction</td>
</tr>
<tr>
<td>Tower Hamlets</td>
<td>Emerging</td>
<td>Submitted Feb 2018</td>
<td>BREEAM: New Construction, BREEAM: Refurbishment Fit Out, HQM</td>
</tr>
</tbody>
</table>
Appendix 3 – NPPF (2019) alignment

The schemes align to the ambitions of a numerous policy drivers within the National Planning Policy Framework (NPPF) (2019). The below table highlights the most relevant sections.

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>20.</td>
<td>Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development; b) infrastructure for transport, telecommunications, security, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat); c) community facilities (such as health, education and cultural infrastructure); and d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.</td>
<td>BREEAM schemes are holistic and drive performance across a range of sustainability aspects including climate resilience and energy performance, materials and their embodied impacts. They drive better water use management, public health and well being, sustainable transport options, good waste management practices and natural environment and ecological protection and enhancements. BREEAM also supports the delivery of higher quality outcomes more generally across the built environment sector through the advocation of better management and assurance procedures.</td>
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<tr>
<td>129.</td>
<td>Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development. These include workshops to engage the local community, design advice and review arrangements, and assessment frameworks such as Building for Life. These are of most benefit if used as early as possible in the evolution of schemes, and are particularly important for significant projects such as large scale housing and mixed use developments. In assessing applications, local planning authorities should have regard to the outcome from these processes…</td>
<td>BREEAM is the longest standing sustainability assessment framework. It offers a range of systems and design tools which project teams and policy makers can use to improve and determine design and construction quality. These draw upon a range of industry best practices and credible, robust methodologies developed by BRE and which are therefore unique to BREEAM.</td>
</tr>
<tr>
<td>130.</td>
<td>Local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme (for example through changes to approved details such as the materials used).</td>
<td>The final certification stages of most BREEAM schemes is based upon ‘as built’ evidence. As such, BREEAM helps ensure that the quality of approved development is not reduced at completion as it validates as-built performance. Additionally, the introduction of a post-occupancy stage assessment in the 2018 BREEAM UK New Construction scheme aims to take this a step further by confirming that the building performs as expected.</td>
</tr>
</tbody>
</table>
### Appendix 3 – NPPF (2019) alignment cont.

<table>
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</thead>
<tbody>
<tr>
<td>131.</td>
<td>In determining applications, great weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings.</td>
<td>The fundamental principles of BREEAM are based upon raising standards of design and helping developers and other stakeholders show case their good credentials. All of the schemes assessment criteria are flexible. Technology and design aesthetic agnostic; focusing on process and outcomes rather than solutions. As such, they have been applied across all local contexts; rural, urban, sensitive and everything in-between.</td>
</tr>
<tr>
<td>148.</td>
<td>The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change.</td>
<td>BREEAM was first developed in the wake of the 1970s energy crisis. As such, it has a strong legacy of tackling climate change head on. The criteria has evolved over time and today not only addresses carbon reduction and energy performance, but also embodied impacts, flood risk, water scarcity, over heating and climate adaptation and resilience more broadly</td>
</tr>
</tbody>
</table>
This resource is the output of a number of BREEAM engagement initiatives and has been produced through a combination of workshops, meetings, written consultation and individual feedback. It has been led and developed by Charlene Clear, Jonathan Gilbert and Charlotte Hardy of the BRE Group. We are grateful to all those who have contributed including those from the BREEAM assessor and developer networks, and specifically to the individuals and organisations below…

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Amy Harvey, Bristol City Council.
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Katie McFloyd, Tunbridge Wells Borough Council.
Daniel Slade, RTPI.
Graham Thomas, Essex County Council.
James Wrixon, AECOM.

With many thanks.