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Closing the performance gap in buildings

A Client Guide to London Plan Compliance on Referable Buildings

Practical steps to satisfy SI 2, SI 3, SI 7, WLC and Be Seen on GLA referable buildings

London Plan Sustainability - How to Comply

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This guide shows the policies you must address to secure consent in London, what each policy means in plain English and the steps and documents to submit at planning.

What this guide covers:

_ **Energy Strategy (SI 2)** — Net zero carbon in operation using Be Lean, Be Clean, Be Green method with a minimum 35% on site reduction from Building Regulations for new buildings.

_ **Whole Life Carbon** - Measure and reduce embodied carbon at pre-app, planning and post construction stages using the GLA reporting template.

_ **Circular Economy (SI 7)** - Conserve materials, design for adaptability and disassembly and plan for reuse before recycling.

_ **Heat Networks (SI 3)** - Connection to a heat network if one is available. If not, design must be future proofed for connection.

_ **Be Seen** - Commitment at planning, As-Built and years 1-5 for In-Use energy performance reporting.

What you will need at planning

_ Energy Assessment + GLA Carbon Spreadsheet

_ Whole Life Carbon Assessment + GLA template

_ Circular Economy Statement with targets

_ Heat network connection or future proofing strategy

_ Be Seen planning stage estimates and commitments

Referable Schemes

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A referable scheme is a planning application of Potential Strategic Importance (PSI) that must be referred to the Mayor of London under the Town and Country Planning (Mayor of London) Order 2008. In practice, that means the local planning authority sends the application to the Greater London Authority (GLA) for Stage 1 consultation and again at Stage 2 for the Mayor's final decision after the borough resolution. Stage 1 has a six week window for comments and Stage 2 has a 14 day decision period.

Applications are referable to the GLA if they meet one or more of these thresholds:

_ **Large scale housing:** 150 or more homes

_ **Large scale floorspace**: new buildings with total floorspace exceeding 100,000m^2 in the City of London, 20,000m^2 in Central London and 15,000m^2 outside Central London

_ **Tall buildings:** over 25m high and adjacent to the River Thames, over 150m high in the City of London, over 30m high outside the City of London

_ **Substantial height increases:** alterations that add more than 15m and take the building above the relevant height threshold under the 'Tall builidings' criteria

_ Development on Green Belt or Metropolitan Open Land with a building over 1,000m^2 or a material change of use

_ Non conforming schemes of 2,500m^2 (plus) in specified use classes

_ Non residential proposals with 200 (plus) parking spaces

More information can be found at https://www.legislation.gov.uk/uksi/2008/580/contents

Be Lean, Be Clean, Be Green, Be Seen

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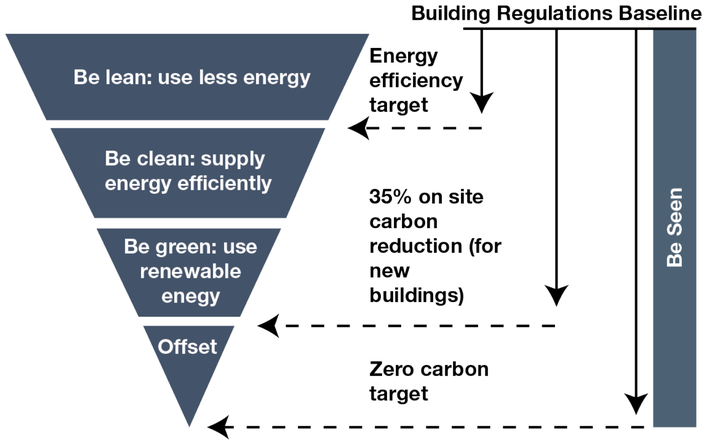
Using Building Regulations compliance software, major new developments in London must be Net Zero Carbon in operation. Developments must demonstrate at least 35% on-site carbon reduction beyond Building Regulations and follow the energy hierarchy.

Be Lean — First stage is ensuring a 'fabric first' approach is initiated for new build designs and that energy from active systems such as lighting and ventilation is reduced as much as possible. For residential buildings, there is a 10% target from Part L, for commercial buildings, the target is 15%.

Be Clean - An analysis of the London Heat Map must be conducted to establish whether there are any local heat networks the building could connect to. If so, the Design Team must contact the heat network operator to discuss a possible connection. If there are no heat networks in the vicinity, a provision of plant room space must be given over to a possible future connection to a network.

Be Green - On site Low Zero Carbon Technologies must be investigated in order to ensure that the development can achieve a 35% overall reduction from the Part L Building Regulations. This is normally achieved via a combination of maximised PV array(s) and/or heat pump technology to provide heat.

Be Seen - Using CIBSE TM54 modelling, an estimation of the energy consumption of the building including end uses must be presented for planning. This is normally updated at As-Built stage with In-Use performance tracked and uploaded to the GLA website in years 1-5 of the buildings life.



What to submit for the Energy Strategy

_ GLA compliant Energy Strategy document following supplementary planning guidance (SPG) 'Energy Assessment Guidance'.

_ GLA spreadsheet detailing the modelling steps and savings for achieving the reduction targets and the offset payment amount.

Carbon Offsetting

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Under London Plan Policy SI 2, major developments must be Net Zero Carbon in operation by maximising on-site reductions first. Where a residual regulated carbon shortfall remains, the developer pays a cash-in-lieu contribution into the local borough's carbon offset fund via Section 106 Agreement. Boroughs then spend these ring-fenced funds on local carbon-saving projects

How payment is calculated

Most boroughs use the GLA's benchmark price of £95 per tonne of CO_2, applied over 30 years to the modelled residual emissions from the energy modelling, giving £2,850 per tCO_2 as a typical contribution basis. For example, Kensington and Chelsea states £2,850/tCO_2 (£95 × 30 years) in its published guidance. Some boroughs are trialling local pricing mechanisms that depart from the default.

_ Example of a local approach: From 01 July 2025, Hammersmith and Fulham encourages use of a Local Carbon Pricing Mechanism with a sliding scale to incentivise more on-site savings, rather than relying solely on the £95/t default.

Scale and transparency

GLA monitoring indicates that since 2016 London's offsetting policy has catalysed ~£333m across London, with ~£146m collected and £44.5m spent by Local Planning Authorities in the 2023 reporting cycle, funding 350+ projects such as energy efficiency retrofits and renewables.

Recent, examples of agreed offset payments (Section 106)

_ **6–10 Bruton Street, Westminster (2025):** S106 included a £131,010 Carbon Offset Fund contribution, 'Be Seen' monitoring and related obligations. (Strategic Planning Committee, 27 May 2025)

_ **92 Dean Street (West End House) S73, Westminster (2025):** S106 variation confirmed a £134,725 carbon offset contribution alongside other obligations. (Strategic Planning Committee minutes, 27 May 2025)

Whole Life Cycle Carbon

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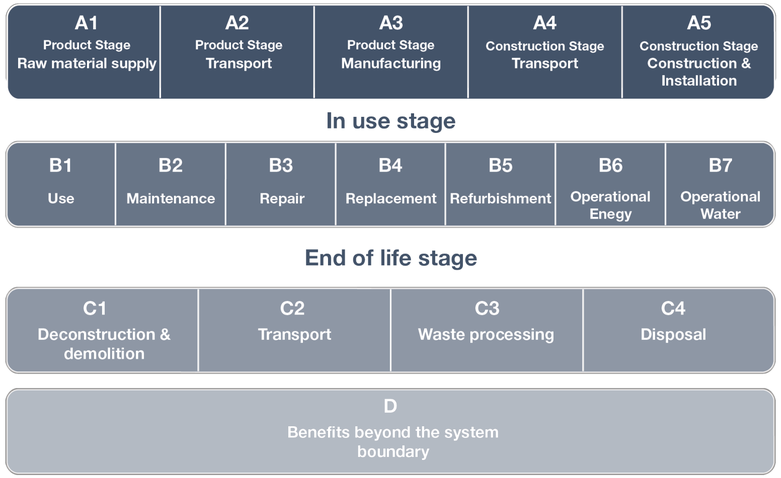
Whole Life Cycle Carbon looks beyond operational energy to the total carbon impact of a building across its life — materials, construction, use, maintenance, replacement and end of life, including demolition and disposal. This is required for referable schemes and increasingly requested by boroughs for major applications. The GLA's adopted WLC Assessments guidance sets out what to include and provides the official assessment template.

What the WLC assessment covers

Scope: Embodied and operational emissions over the whole life of the asset, from product and construction stages through use, to end of life and potential benefits from reuse or recycling.



Methodology and benchmarks

_ **Current position:** The GLA's adopted WLC guidance and template are underpinned by the first edition of the RICS WLC methodology. The second edition of the RICS methodology took effect on 01 July 2024; applicants may additionally provide assessments aligned to that second edition.

_ **Benchmarks:** The GLA guidance includes WLC benchmarks to help teams gauge performance

Submission stages and evidence

_ **Pre-application:** Set out the approach, key material choices and likely carbon hotspots to steer design.

_ **Planning submission:** Provide the WLC assessment and template, assumptions, quantities and carbon factors and show the optioneering that led to the preferred design.

_ **Post-construction:** LPAs normally secure a post-construction WLC with As-Built data to verify performance against design intent.

Circular Economy

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Major referable schemes in London must submit a Circular Economy (CE) Statement showing how materials are kept at their highest value, how waste is prevented and how the building can be adapted, disassembled and its parts reused. Use the GLA written report + CE template spreadsheet at pre-app, planning and post-construction. Boroughs may also apply this to smaller schemes.

A Circular Economy Statement is required on referable schemes and must be submitted with the GLA written report and spreadsheet at pre-app, planning and post-construction. Use it to show how materials are kept at highest value and how the building can be adapted, disassembled and its parts reused.

Prioritise retention of existing structure, design in layers, and design out waste so components can be replaced and reused. Referable developments should promote circular outcomes and aim to be Net Zero Waste, with London Plan outcomes of 95% reuse/recycling/recovery for construction and demolition waste and 95% beneficial use of excavation arisings.

Include a pre-redevelopment or pre-demolition audit and a Bill of Materials so you can quantify reuse, recycling and targets by building layer. Submit a post-construction closeout to report actual quantities and outcomes.

Design for Adaptability

Design for Deconstruction

Material Selection

Resource Efficiency

What to submit for Circular Economy

_ **Circular Economy Statement**: written report plus the GLA CE spreadsheet at the planning stage

_ **Pre-redevelopment / pre-demolition audit:** identify what is retained, reused on or off site and recycled

_ **Bill of Materials:** quantities, targets and routes by building layer

_ **Targets**: circular outcomes with net zero-waste aim, 95% C&D reuse/recycling/recovery, 95% beneficial use of excavation

_ **Post-construction report:** submit to the GLA within three months of practical completion

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