

# Energy Efficiency Policies FAQs

July 2023

## Central Lincolnshire LOCAL PLAN



Please note: this FAQ List may be updated to take account of additional questions being received. Each version will be published with a month version reference on the Central Lincolnshire Website.

### Q: How can I meet the requirements of the climate change policies?

A: This depends on what you are proposing to do in your application. Different uses and forms of development will need to consider different climate change policies and the amount of information required will also vary. The question below should help you understand what information you need to submit and more information on what is required from these submissions is provided in the [Energy Efficiency Design Guide and Energy Statement Guidance and template](#), available on the [Central Lincolnshire website](#) under the climate change heading.

### Q: What do I need to submit with my application?

A: To assist with understanding what should be submitted and when, please see below. If you are still unsure, please contact the development management team.

**Key:** ✓ = Needed, ✗ = Not Needed, ? = May be Needed / Encouraged

Type of application	Energy Statement (Policies S6, S7, S8, S11, S20)	Energy Efficiency Checklists (S6, S7, S8)	Details of efforts to reduce embodied carbon (S11)	Notes
<b>Householder</b>				
Householder extension	?	✗	✗	Whilst householder extensions will not usually require an energy statement it is recommended that applications consider opportunities to deliver energy efficient measures and so an Energy Statement is recommended.

Development of an annexe either under a householder application or a full application	✓	?	X	As an annexe is the creation of new residential accommodation, applications should be accompanied by an Energy Statement to demonstrate the steps taken to make it efficient. Whilst not a standalone dwelling, applications should seek to achieve the standards in policies S7 where possible. It should also set out how the requirements of Policy S6 have been met or where they have not been possible to achieve and why.
<b>Residential</b>				
Major residential development (development of 10 or more dwellings or a site area of 0.5ha or larger)	✓	✓	✓	Major residential developments are required to include an Energy Statement accompanied by a completed checklist. The Energy Statement should also include details of the consideration of using materials with a lower embodied carbon.
Minor residential development (i.e. not major development)	✓	✓	?	Minor residential developments are required to include Energy Statement accompanied by a completed checklist. Whilst not a requirement, efforts to reduce embodied carbon are welcomed wherever possible.
Change of use to residential including substantial building work	✓	✓	?	Where new dwellings are being created through a change of use and there is substantial building work taking place, the application should include an Energy Statement and a completed checklist. Any areas of difficulty with achieving the standards in the policy should be clearly set out. If the proposal involves the delivery of 10 or more dwellings the Energy Statement should also include details of the consideration of using materials with a lower embodied carbon.
Change of use to residential where building work is limited	✓	?	X	Where new dwellings are being created through a change of use and there is limited building work taking place, the application should include an Energy Statement which demonstrates the steps being taken to ensure that the new dwellings are efficient and detailing any areas of difficulty in achieving the standards. This may include a completed energy efficiency checklist unless it can be justified that it is not needed for the specific context, i.e. so little building work is proposed to take place it would not be useful or reasonable.
<b>Non-residential</b>				
Major development (development of 1,000m <sup>2</sup> floorspace or more, or a site of 1 hectare or more)	✓	✓	✓	Major developments are required to be submitted with an energy statement accompanied by a completed checklist. The Energy Statement should also include details of the consideration of using materials with a lower embodied carbon.

Minor development (not major development)	✓	✓	?	Minor developments are required to be submitted with an Energy Statement accompanied by a completed checklist. Whilst not a requirement, efforts to reduce embodied carbon are welcomed wherever possible.
Change of use to a non-residential use including substantial building work	✓	?	?	Where substantial building work is required as part of a change of use application, it should include an Energy Statement and may require a completed checklist dependent on the nature of the scheme. Any areas of difficulty with achieving the standards in the policy should be clearly set out. If the proposal involves the delivery of 1,000m <sup>2</sup> or more floorspace the Energy Statement should also include details of the consideration of using materials with a lower embodied carbon.
Change of use to a non-residential use where building work is very limited	?	X	X	Where a change of use to a non-residential use is proposed and there is very limited building work taking place, whilst there will be no requirement to meet the standards in Policies S6 and S8, it is recommended that this is investigated and detailed in an Energy Statement.
Extension to a non-residential building	?	?	?	The requirement to incorporate an Energy Statement is entirely dependent on the scale of extension and the building work required. As a rule it is recommended that all applications are accompanied by an Energy Statement taking opportunities to improve energy efficiency and deliver renewables wherever possible. However, they will only be required where the extension is of a substantial scale – c. 500m <sup>2</sup> or more additional floorspace. If the proposal involves the delivery of 1,000m <sup>2</sup> or more floorspace it is beneficial if the Energy Statement also includes details of the consideration of using materials with a lower embodied carbon.

**Q: What is expected from an Energy Statement?**

A: Guidance and a template for Energy Statements has been published on the [Central Lincolnshire website](#). Following this will help ensure your submission is properly and clearly evidenced.

**Q: Where can I find an energy consultant to complete an Energy Statement?**

A: There are a number of potential sources for consultants who can complete an Energy Statement. Many of these specialist consultants will also be able to inform and assess various parts of your proposal, details of many of these can be found at:

- Passivhaus Trust - <https://www.passivhaustrust.org.uk/members/map/>
- BREEAM Assessors - <https://tools.breeam.com/projects/explore/companies.jsp>

- Chartered Institute of Building Services Engineers (CIBSE) - <https://www.cibse.org/directories/directory-of-practices>
- UK Green Building Council - <https://ukgbc.org/members/>
- Energy Institute - <https://www.energyinst.org/industry/energy-efficiency-register>
- Elmhurst Energy assessor register - <https://www.elmhurstenergy.co.uk/find-an-assessor/>

If you are a company and want to develop your own energy assessors there are also numerous training options available throughout the UK including Elmhurst Energy, Quodox, Energy Trust, and more.

For the simplest of Energy Statements, such as for small scale schemes, this can be completed by the same person that completed SAP calculations or an EPC certificate. However, these assessors will be unlikely to be able to inform on options for maximising and enhancing efficiency of a building throughout the design process.

**Q: How will adherence to the policies be inspected or regulated?**

A: Conditions will be applied to permissions requiring demonstration of post-construction testing and monitoring. The way these conditions work in practice may vary depending on the scale or context of a proposal. Failure to meet the standards proposed may result in further action or penalty.

**Q: The standards are too challenging to meet or are causing viability issues.**

A: The standards in the plan are already being achieved in many developments across the country including in Lincolnshire. The cost of implementing the policies have been rigorously tested in the Local Plan Examination. It is recognised that there may be challenges in completing the design and gathering the information in the first instance, but this should be come easier once first completed. There is a lot of information and training available to help adjust to delivering against these policies and the importance of doing so is set out in the Local Plan climate change evidence. This includes, but is not limited to:

- [Passivhaus Trust](#)
- [Elmhurst Energy](#)
- [Quodox](#)
- [City and Guilds](#)
- [Energy Trust](#)

**Q: My SAP calculations are not allowing my scheme to meet the standards in Policy S7/S8, what do I do?**

A: SAP is currently unfit to calculate unregulated energy, as it is not a key component of Part L 2021 standards. PHPP is therefore the preferred modelling tool to demonstrate compliance with Policy S7/S8, since PHPP is proven to predict unregulated energy loads more accurately. SAP overestimates unregulated energy due to outdated equations, whereas unregulated energy in PHPP is far more realistic. Subsequently, the use of PHPP over SAP makes policy compliance for EUI simpler and easier. The Energy Statement Guidance and Template Document provides an assumed unregulated energy calculation to be included in assessments to allow a more accurate prediction of unregulated energy use depending on the size of dwelling/s being built. The nearest dwelling size should be used in calculations.

Gross Internal Floor Area (m <sup>2</sup> )	Calculated Occupancy (SAP)	Unregulated Energy kWh / m <sup>2</sup> / year
50	1.69	24.4
61	2.01	21.9
84	2.53	19.3
110	2.81	16.3

*Please note, if these figures are being used in the place of the SAP figures, a commitment to including energy efficient appliances will be needed where these are to be provided as part of the first sale.*

**Q: How should the unregulated energy use be calculated where the end user is not known for a commercial unit?**

*A: The exact expected unregulated energy use does not need to be known, provided the specific standards for efficient buildings in the Design Guide are achieved and on-site renewables are included to meet a reasonable expectation of energy usage for the type and use class of the building, with adequate evidence to demonstrate this within the Energy Statement.*