This table has been prepared by Square Gain Ltd to inform the development of sustainable design & construction policies in the Swale Local Plan Review, January 2021

Definitions:

i. **Operational energy** is the energy required during the entire service life of a building such as lighting, heating, cooling, and ventilating systems. Becoming more energy efficient means using less operational energy. Operational energy use is calculated using the SAP (Standard Assessment Procedure), which results in a SAP Rating.

ii. **Operational carbon** is the emissions of carbon dioxide equivalent Greenhouse Gases, associated with the power-source that provides the energy required during the entire service life of a building, for example emissions from burning natural gas to heat the building, or electricity to power air-conditioning to cool the building. The Government publish 'carbon factors' for each energy source in the UK. Becoming more carbon efficient can be achieved either by becoming more energy efficient, or by using an energy source that has a lower carbon factor, or by installing on site renewable energy (or a combination of these)

iii. **On site renewable energy** is the energy that is collected from renewable sources such as wind and solar that are located on the building or site.

iv. **Carbon offsetting** is a mechanism by which an individual or organisation can purchase carbon credits, equivalent to their carbon emissions associated with a particular activity. In the case of a building, the carbon offset is calculated based on 30 years operational carbon emissions of the building. Offsetting is used to achieve the net-zero position, as per the Swale Borough Council commitment to achieve Net Zero Carbon emissions. If we imagine there is a cap on the total carbon emissions that are allowable from a building, and also a cap on the amount of carbon that can be offset, this will encourage operational carbon efficiencies (as outlined above).

v. **Embodied carbon** is the carbon dioxide (CO_{2e}) emissions associated with the manufacture and use of construction products.

vi. **Heat networks** (sometimes referred to as district heating) are a distribution system that takes heat from a centralised source and delivers it to a number of different buildings. Heat networks benefit from significant economies of scale and efficiencies.

vii. The **Standard Assessment Procedure** (SAP), is the methodology used by the Government to assess and compare the energy and environmental performance of dwellings. It is the basis for establishing compliance with Building Regulations, and for Energy Performance Certificates (EPCs). EPCs have two metrics, a fuel-cost-based energy efficiency rating (commonly called the 'EPC' rating, in £/kWh/m^2) and a rating relating to carbon dioxide (CO_2) emissions (the Environmental Impact (EI) rating, in CO_2/m^2). Ratings are banded A-G, with A being the highest performing.

viii. The **Simple Building Energy Model** (SBEM) is the calculation used to assess the carbon dioxide (CO_2) emissions associated with non-domestic buildings, and (similar to the SAP used for dwellings) is used to demonstrate that the building meets the CO_2 Target Emissions Rate, and to produce the buildings Energy Performance Certificate (EPC).

i-iv. above are closely interlinked.

	Applicability	On Plan publication	By 1st Jan 2025	By 1st Jan 2030	Mechanisms for measurement and monitoring *KEY:* • *BLACK: Requirement detail* • *GREY: Process* • *ORANGE: Note*	Justification and rationale
Operational energy[1]	All new developments	B rating	A rating	A rating	Using the buildings as built Standard Assessment Procedure (SAP) rating, which is a measure of the overall efficiency of the dwelling. The higher the rating the more energy efficient and the lower the fuel bills will be. There is already a Building Regulation requirement that developers submit for the 'as built' SAP rating already. This would simply give this some meaning (note - Full SAP, not the Rd SAP). The requirement for operational energy use intensity (as defined by the initial requirement for a B rating, and from 2025 an A rating) is so that we have a lesser amount of associated carbon to offset in order to achieve 'net' zero carbon.	As per SBC Planning Condition to transition to zero carbon, using the energy hierarchy i.e. to reduce usage (and emissions) as the first priority. An example that has gone further is The London Councils have a requirement for all London homes to be EPC B rated by 2030 – this is a much taller order as relates to retrofitting, whereas we are concerned with new build. Note: The Future Homes Standard (FHS), 2019 consultation on Part L and Part F of the Building Regulations for new dwellings, states that the government is *"exploring options, including whether to commence the amendment to the Planning and Energy Act 2008 which would restrict local planning authorities from setting higher energy efficiency standards for new homes. We will consider whether it is appropriate to do this with the introduction of the uplift to energy standards in Part L in 2020, depending on decisions on that uplift; or to wait until the Future Homes Standard is introduced''* consultation seeks views on two options to uplift the current Part L energy efficiency standards in 2020 for new homes, on the new Approved Document guidance to support the proposed changes to Part L and on changes to transitional arrangements in 2020. The consultation also considers the wider impacts of Part L for new homes, including changes to Part F (Ventilation), its associated Approved Document guidance, airtightness and improving as-built performance. The FHS may change the forthcoming update to the Building Regulations and the consultation proposes that local authorities will not be allowed to require improved operational energy efficiency than national regulation.

[1] Extract from The Future Homes Standard (FHS), 2019 consultation on Part L and Part F of the Building Regulations for new dwellings:

2.23. The Planning and Energy Act 2008 (as amended) allows local planning authorities to set and apply policies in their local plans which require compliance with energy efficiency standards for new homes that exceed the requirements of the Building Regulations. This has been very useful in delivering more energy efficient homes and reducing carbon dioxide emissions in local areas but has also led to there being inconsistent minimum energy standards being applied across the country.

2.24. In 2015, the then government set out in a Written Ministerial Statement its expectation that local planning authorities should not set energy efficiency standards for new homes higher than the energy requirements of Level 4 of the Code for Sustainable Homes (equivalent to a 19% improvement on the Part L 2013 standard). Section 43 of the Deregulation Act 2015 would introduce an amendment to the Planning and Energy Act that restricts local authorities from setting energy standards above Building Regulations levels for new homes, but this amendment has not yet been commenced.

2.25. We realise that this may have led to confusion and uncertainty for both local planning authorities and home builders. Many local planning authorities are unclear about what powers they have to set their own energy efficiency standards, although a number of local authorities continue to set their own energy performance standards which go beyond the Building Regulations minimum. While most of these adhere to the 19% level set in the 2015 Written Ministerial Statement, some go further.

2.26. This situation is not only confusing but the application of disparate energy efficiency standards across local authority boundary lines often means that homes need to be built to different technical specifications in different parts of England. This inconsistency creates inefficiencies in supply chains, labour and potentially quality of outcomes. It also means that decisions about the technical appropriateness, application and enforcement of energy standards need to be considered by planning officers, committees and Planning Inspectors rather than by a building inspector.

2.27. As we move to the higher energy standards required by Part L 2020 and the Future Homes Standard, there may be no need for local authorities to seek higher standards and the power in the Planning and Energy Act 2008 may become redundant.

2.28. The government is therefore exploring options, including whether to commence the amendment to the Planning and Energy Act 2008 which would restrict local planning authorities from setting higher energy efficiency standards for new homes. We will consider whether it is appropriate to do this with the introduction of the uplift to energy standards in Part L in 2020, depending on decisions on that uplift; or to wait until the Future Homes Standard is introduced.

A question is then asked:

When, if at all, should the government commence the amendment to the Planning and Energy Act 2008 to restrict local planning authorities from setting higher energy efficiency standards for dwellings?

a. In 2020 alongside the introduction of any option to uplift to the energy efficiency standards of Part L

b. In 2020 but only in the event of the introduction of a 31% uplift (option 2) to the energy efficiency standards of Part L

c. In 2025 alongside the introduction of the Future Homes Standard

d. The government should not commence the amendment to the Planning and Energy Act

					Developer to provide full SAP/SBEM assessment to Design Management Officer (DMO) Development Management Officers to check that the EPC on the SAP certificate achieves the required rating. An EPC is already required as part of standard Building Regulations for all development.	There may not be a requirement for operational energy efficiency greater than national regulation as long as Swale has a requirement for on site renewable energy at a sufficient % of total energy to warrant energy efficiency measures to be implemented. The published timetable for the introduction of the changes proposed by the FHS are that the Part L, Part F and overheating regulations will come into force in mid/late 2020.
Operational carbon	All new developments	50% reduction of operational carbon compared with 2013 Building Regulations	75% reduction of operational carbon compared with 2013 Building Regulations	Zero Carbon: 100% reduction based on 2013 Building Regulations	Using the buildings Dwelling Emission Rate over the target emission rate (as defined in the 2013 Building Regulations). Developer to provide full design SAP/SBEM assessment (including SAP/SBEM Calculation summary breakdown sheet) to the Planning Department (this checks the building design). Development Management Officer (DMO) to check on-site that all design requirements have been installed during construction (this checks the building post construction) An EPC is already required as part of standard Building Regulations for all development. The SAP Calculation summary breakdown sheet is already conducted as part of producing the EPC.	As per SBC Planning Condition to transition to zero carbon (already justified). To achieve 50% reduction, see SBC guidance – generally only a change in fuel type (from gas to electric, for example using an ASHP, plus one PV panel is needed. There are no fabric improvements. According to the UK Committee on Climate Change UK Housing: Fit for the future? Report 2019, "To improve fabric standards and install low-carbon heat via retrofit costs up to five times more than achieving the same standards when first constructing the home." https://www.theccc.org.uk/publication/uk-housing-fit-for-the-future/ page 65 The Future Homes Standard states that "*We anticipate that the installation of heat pumps, particularly air-to-water and air-to air heat pumps, will play a major role in delivering low carbon heat for homes built to the Future Homes Standard. Heat pumps come with the same low-carbon benefits as direct electric heating, but can deliver heat much more efficiently, which can help to overcome the affordability and grid-resource constraints associated with direct electric heating.* *However, the installation of heat pumps in the UK is at a level much lower than that necessary to meet the ambition of the Future Homes Standard. The CCC states that there is a need to establish heat pumps as a mass market solution for low carbon heating and there are opportunities to start this with new build properties. The Committee also recommends that 'new homes should not be connected to the gas grid from 2025'. 17 This has informed our thinking on how we should frame the Future Homes Standard."* The Sixth Carbon Budget Report by the Committee on Climate Change[2] (December 2020) analyses the costs required to achieve zero carbon and states that *"Total*

[2] the Sixth Carbon Budget The UK's path to net zero (page 120) https://www.theccc.org.uk/publication/sixth-carbon-budget/

					Building Control Officers are already on site (checking against Building Regulations) and can easily undertake a simple check-sheet against the Design SAP calculation summary breakdown sheet.	*investment costs are less than £10,000 per household on average in our Balanced Pathway. 63% of homes need spend no more than £1000 on retrofitting energy efficiency measures."* There are a number of examples of affordable zero carbon housing schemes (by commercial developers) e.g. https://www.constructionenquirer.com/2020/06/25/hill-group-to-deliver-affordable-zero-carbon-homes/ https://www.pbctoday.co.uk/news/modular-construction-news/carbon-zero-modular-homes/78980/ The low carbon homes at BedZED, which were first sold in 2002, continue to sell for an average of 5 – 10% more than homes of the same size in the same area. https://www.bioregional.com/projects-and-services/case-studies/bedzed-the-uks-first-large-scale-eco-village
On site renewable energy	All new developments	To meet at least 20% of the total regulated operational energy demand	To meet at least 50% of the total operational energy demand (regulated and unregulated energy)	To meet at least75% of total energy demand (regulated and unregulated energy)	Developer to provide full design SAP/ SBEM assessment (including SAP/ SBEM Calculation summary breakdown sheet) to the Planning Department (this checks the building design). Building Control Officer (DCO) to check on-site that all design requirements have been installed during construction (this checks the building post construction) An EPC is already required as part of standard Building Regulations for all development. The SAP Calculation summary breakdown sheet is already conducted as part of producing the EPC. Building Control Officers are already on site (checking against Building Regulations) and can easily undertake a simple check-	10% on site renewables requirement has been in effect in the London Borough of Merton since 2003 (the Merton Rule), since which time building regulations have required improved energy efficiency (resulting that 10% of the total energy required is a lower requirement than it would be today), and 20% is more appropriate. Renewable energy systems have decreased in price significantly over the last 10 years. Solar PV module prices have fallen by around 90% since the end of 2009, while wind turbine prices have fallen by 55-60% since 2010 (International Renewable Energy Agency, https://www.irena.org/costs/) 50% and 75% - ensuring that the SBC Planning Condition to transition to zero carbon, uses the energy hierarchy, and avoids an offset which would latterly see homeowners bear the brunt of increased energy cost, and mean that Swale misses their Net Zero Carbon 2030 target

					sheet against the Design SAP calculation summary breakdown sheet.	
Carbon offset	All new developments	None	Maximum of 50% of total carbon emissions	Maximum of 25% of total carbon emissions	Developer to provide full SAP/ SBEM assessment (including SAP/ SBEM Calculation summary breakdown sheet) to the Planning Department (this checks the building design). Planning Officers to check that the developer has purchased sufficient carbon credits to offset the Environmental Impact rating stated on the SAP certificate.	If zero carbon operational carbon is not viable, the stated maximum percentage of carbon emissions may be offset for a number of years and paid for by the developer. The offset period should be assumed as the lifetime of the development, currently recommended by the GLA as being 30 years. The price of the carbon offset may change over time, The GLA currently recommends a carbon price of £60/tonne. Note, the cost of the offset must be a higher cost than would be incurred by reducing the carbon on-site, to encourage the correct use of the energy hierarchy. The offset fund should then be ringfenced by SBC for use contributing to 'hard to treat' retrofit or councils' own buildings (thus saving tax payers money). Swale intends to establish its own Carbon Offset Fund, but there are established schemes that could be used as an alternative. See: https://www.london.gov.uk/sites/default/files/carbon_offsett_funds_guidance_2018.pdf and https://www.london.gov.uk/sites/default/files/london_carbon_offset_price_-_aecom_.pdf
District Heating[3]		Residential developments of over 500 dwellings or 10,000m2 total non domestic buildings, across all development phases	Residential developments of over 200 dwellings or 5,000m2 total non domestic buildings, across all development phases	Residential developments of over 100 dwellings or 3,000m2 total non domestic buildings	Outline design and detailed design drawings Developer to submit outline design drawings and detailed design drawings to the Planning Department for approval.	Heat networks usually connect hundreds and often thousands of homes and buildings. • Large networks are classified as 500 or more residential properties and /or more than 10,000m2 of non-domestic space. • Medium networks – between 100 and 500 residential properties and /or between 3,000-10,000m2 non-domestic space. • Small networks – less than 100 residential properties and /or less than 3,000m2 non-domestic space [4] The UK Governments Community Energy Saving Programme (a precursor to the Energy Company Obligation) claims energy savings from a typical community heating scheme are typically 25% compared to individual gas boilers. https://www.ofgem.gov.uk/ofgem-publications/58762/cesp-update-6final-300413pdf and also see the Government's Community Energy Strategy for examples of energy and cost savings

[3] https://www.gov.uk/guidance/heat-networks-overview

[4] https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/212565/summary_evidence_district_heating_networks_uk.pdf

						https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/275163/20140126Community_Energy_Strategy.pdf There are currently over 17,000 district heating networks operational in the UK and nearly 500,000 connections to them (https://energysavingtrust.org.uk/service/district-heating/) The FHS states that "*Heat networks (sometimes referred to as district heating) are a distribution system that takes heat from a centralised source and delivers it to a number of different buildings. These heat networks also form an important part of our plan in the future of low carbon heat, in particular in cities and high-density areas. Heat networks can decarbonise more easily compared to most other heat sources because new technologies can be added to the system with little disruption to individual householders. They provide a unique opportunity to exploit larger scale, renewable and recovered heat sources that can't be accessed at an individual building level. Heat networks also provide system benefits such as thermal storage and reducing the energy demand of the grid at peak times. It is estimated by the CCC that around 18% of UK heat will need to come from heat networks by 2050 if the UK is to meet its carbon targets cost-effectively. We expect that heat networks will have a strong role to play in delivering low carbon heat to new homes in future."* Section 3.56 of the FHS consultation goes on to state *"In order to encourage heat networks, we propose that weighting, which we refer to as 'technology factors', is applied into calculations for the target emission rate and target primary energy for new dwellings where the design incorporates heat networks. Applying these technology factors is intended to encourage heat networks; this is in recognition of the ability of heat networks to decarbonise over time……. " and that "We think heat pumps and heat networks should typically be used to deliver the low carbon heating requirement of the Future Homes Standard.''*
Embodied carbon	Residential developments with 10 units or more, and non-domestic developments over 1000m2	• Consider natural and renewable materials. • Reduce the use of high embodied carbon materials to a maximum of 1,200kg CO2e/m2	Reduce the use of high embodied carbon materials to a maximum of 600kg CO2e/m2	Reduce the use of high embodied carbon materials to a maximum of 250kg CO2/m2	Developer to provide completed Embodied Carbon Calculator using simple tool on SBC website. Planning Officer and Sustainability Officer to check the submitted Embodied Carbon Calculator return This is a new requirement and Swale Borough Council are developing a simple Embodied Carbon Calculator to enable	Top few priority materials embodied carbon can be calculated easily at very little cost. Swale Borough Council could even establish their own very simple embodied carbon tool for these materials, which would also fulfil the reporting requirement for developers

		• Measure the embodied carbon of high embodied carbon materials including the structure and envelope: • Concrete • Steel • Timber • Brickwork • Insulation			developers to complete this in just a few minutes.	
	Major Infrastructure projects	• Measure the embodied carbon of materials Demonstrate carbon savings through alternative materials and materials efficiency				Infrastructure projects can involve the use of large quantities of materials, which have high amounts of embodied energy. As such, major infrastructure projects are required to undertake an analysis of embodied energy to help identify opportunities for the use of lower embodied energy alternatives.
Water	Non domestic developments over 1000m2 GIA	12.5% improvement over baseline building water consumption as per the BREEAM Wat 01 calculator	12.5% improvement over baseline building water consumption as per the BREEAM Wat 01 calculator	12.5% improvement over baseline building water consumption as per the BREEAM Wat 01 calculator	BREEAM Wat 01 Calculator for non-domestic	Improved water efficiency over the baseline building have been used for two reasons: • Swale is located in a water stressed area (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf) • Non domestic buildings: BREEAM Excellent requires a 12.5% improvement over baseline building water consumption as per the BREEAM Wat 01 calculator, which assesses the efficiency of the domestic water-consuming components. https://www.breeam.com/NC2018/#08_water/wat01_nc_a.htm%3FTocPath%3D8.0%2520Water%7C_____1
	All new domestic buildings	Developments of 10 or more dwellings, should	All developments to achieve Water	All developments to achieve Water Efficiency, 01	HQM 01 Water efficient fittings, criteria 1 for domestic	Improved water efficiency over the baseline building have been used for two reasons: • Swale is located in a water stressed area (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/244333/water-stressed-classification-2013.pdf)

		achieve Water Efficiency, 01 Water efficient fittings, criteria 1: 11 credits to be scored	Efficiency, 01 Water efficient fittings, criteria 1: 11 credits to be scored	Water efficient fittings, criteria 1: 11 credits to be scored		• HQM 8.1 Water Efficiency, 01 Water efficient fittings, criteria 1: 11 credits to be scored: All water fitting categories in the Advanced fittings standard (equivalent to 100 litres/person/day), and modelled water consumption, calculated in accordance with Appendix A of Approved Document G (HM Government. 2015. Approved Document G - Sanitation, hot water safety and water efficiency. 2015), to be no more than 100 (l/p/d) https://www.homequalitymark.com/wp-content/uploads/2018/09/HQM-ONE-Technical-Manual-England.pdf
Waste	All developments required to carry out HQM or BREEAM Assessment	Demonstrated measures to minimise waste in the construction, use and life of buildings and promote layouts to facilitate waste storage, reuse, recycling and composting.	Demonstrated measures to minimise waste in the construction, use and life of buildings and promote layouts to facilitate waste storage, reuse, recycling and composting.	Demonstrated measures to minimise waste in the construction, use and life of buildings and promote layouts to facilitate waste storage, reuse, recycling and composting.		• Development should demonstrate measures to minimise the generation of waste in the construction, use and life of buildings and promote more sustainable approaches to waste management, including the reuse and recycling of construction waste and the promotion of layouts and designs that provide adequate, well-designed space to facilitate waste storage, reuse, recycling and composting. • Domestic buildings: - HQM credit 7.3 Recyclable Waste: Major developments to score at least 7 or the 10 available credits. Minor developments to score at least 5 credits across the following areas: ○ Home information ○ Consultation with the waste collection authority ○ Internal waste storage ○ Composting facilities and management • Domestic buildings: - HQM credit 10.4 Site Waste Management: Major development sites should score at least 8 credits, and Minor development sites should score at least 6 credits (from the 16 credits available), based on: ○ Product procurement policy ○ Construction resource efficiency ○ Diversion of construction waste from landfill ○ Diversion of excavation waste from landfill • Non-domestic buildings: - BREEAM credit Wst 01 Construction Waste Management: One Credit. Amount of waste generated per 100m² (gross internal floor area) not to exceed: ○ ≤ 13.3 m³ (actual, not bulk volume) ○ ≤ 11.1 tonnes • Non-domestic buildings: - BREEAM credit Wst 03 Operational Waste: One Credit. Provide a dedicated space for the segregation and storage of operational recyclable waste generated, and that the space meets the criteria set out in BREEAM.
BREEAM	Developments with less	Very Good Rating using the current	Very Good Rating using the current	Very Good Rating using the current		BREEAM 'Very Good' rating has been selected at this represents a score of at least 55%. BREEAM Very Good represents the majority of UK BREEAM certifications, with over 80% of assessments achieving this level (source: BRE Global:

	than 1000m2 gross internal floor area (GIA)	BREEAM at time of construction commencement	BREEAM at time of construction commencement	BREEAM at time of construction commencement		https://files.bregroup.com/breeam/briefingpapers/93409-BRE_BREEAM-Delivering-Sustainable-Buildings_A4-.pdf). This study also states that *"Numerous previous studies show that the majority of BREEAM standards have no additional cost over typical practice. Regarding viability, over a buildings' life-cycle, there are significant savings to be made through energy and water efficiencies."*
	Developments with 1000m2 GIA or greater	Excellent Rating using the current BREEAM at time of construction commencement	Excellent Rating using the current BREEAM at time of construction commencement	Excellent Rating using the current BREEAM at time of construction commencement		BREEAM 'Excellent' rating has been selected at this represents a score of at least 70%. BREEAM Excellent represents the top 10% of new non-domestic buildings in the UK (as at 2018, source: BRE), and as such is considered to be best practice. Regarding viability, over a buildings' life-cycle, there are significant savings to be made through energy and water efficiencies: • BREEAM Excellent ratings can be achieved whilst optimising capital costs (source: Currie & Brown 2018 https://files.bregroup.com/breeam/briefingpapers/93409-BRE_BREEAM-Delivering-Sustainable-Buildings_A4-.pdf). BREEAM 'Excellent' is being achieved with the related total construction capital cost uplift being less than **0.75% over baseline building's cost.** • Additional capital expenditure in the non-London Plan BREEAM 'Excellent' scenario shows short undiscounted and discounted **payback periods of 5 years or less** for all energy price scenarios. • Savings from the water efficiency measures selected to achieve the requirements for the first four BREEAM 'Wat 01 Water consumption' credits show undiscounted and discounted **payback periods of 3 years or less** • For a number of uses, including offices, the requirement to achieve 'Excellent' ratings is unlikely to significantly affect viability. However, some types of development, such as industrial uses, warehouses and schools might find it more difficult to meet these standards, where there are more additional requirements compared to the 'standard' building. In these cases, and where developments are less than 1,000m2 GIA, developments must demonstrate that the standard to be achieved is the highest possible for the development, and at a minimum meets the BREEAM 'Very Good' standard.
Home Quality Mark	Developments with <10 units	None	HQM 3 Star Rating	HQM 4 Star Rating	• HQM Pre-assessment • HQM Design stage assessment • HQM Post construction certificate	More than two-thirds of respondents in a recent Money Supermarket questionnaire, reported that if they were buying or renting a property in the future, it would be very important or quite important for the property to have sustainable features, such as high levels of insulation, triple glazing, solar panels etc. Asked if they would prefer to buy or rent a home that had a sustainability stamp of approval, more than half (54%) said that they would and 43% said they would always prefer to buy or rent such a home. Some, around 1 in 5, were even prepared to pay a higher price for a property with a sustainability stamp of approval – provided they could be reliably assured that this would result in seriously reduced environmental impacts and running costs (source:
	Developments with 10 units or more	HQM 4 Star Rating	HQM 4 Star Rating	HQM 4 Star Rating	• HQM Pre-assessment • HQM Design stage assessment	

					• HQM Post construction certificate	Money Supermarket, https://www.homequalitymark.com/research/market-research/). For larger developments HQM 4 Star Rating is deemed to be most appropriate, as there is alignment between the 4 Star Rating and BREEAM Excellent. Larger schemes offer significant economies of scale in both design and construction, and as above may attract a buyer's premium based on the quality of the homes. For smaller developments, where economies of scale are less significant, there is initially no minimum requirement of HQM (which of course does not preclude certification being sought), until 2025, providing adequate time for smaller developers to familiarise themselves with the requirements, and at which time HQM 3 Star Rating is required as a minimum, increasing to a 4 Star Rating as a minimum by January 2030.