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ENERGY STATEMENT

45 Epsom Road

45 Epsom Road, Guildford, Surrey GU1 3PF

CLIENT
Private Client

DOCUMENT REF
FA-EST-0107

REVISION
P01

DATE
22 January 2025

CARBON REDUCTION
100% vs Part L

GRID REF
TQ 00307 49700

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Document control

PROJECT	45 Epsom Road
REPORT	Energy Statement
SITE	45 Epsom Road, Guildford, Surrey GU1 3PF
CLIENT	Private Client
DOCUMENT REF	FA-EST-0107
REVISION	P01
DATE	22 January 2025
PLANNING STAGE	Full planning application
PREPARED BY	Fortress Associates

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Executive summary

This Energy Statement accompanies a full planning application for erection of 2no. three-bedroom all-electric houses with air source heat pumps and rooftop PV at 45 Epsom Road, Guildford, Surrey GU1 3PF. It sets out how the development minimises energy demand and carbon emissions through the energy hierarchy - be lean, be clean, be green - assessed against a Part L 2021 baseline with SAP 10.2 emission factors and the site-specific solar resource for these coordinates.

The baseline regulated emissions of a Part L 2021-compliant building of this size and use are 2,225 kgCO2 per year. The Be Lean fabric and services measures hold demand down, although the notional baseline includes a photovoltaic allowance, so the pre-renewables position stands 21.4% above it; the air source heat pump and 12 kWp solar photovoltaic array bring the total on-site reduction to 100% - 2,225 kgCO2 saved every year.

The applicable target is Part L 2021 compliance (national requirement): the development meets it on site. The predicted energy use intensity including unregulated energy is 50 kWh/m²/yr. Overheating is managed through the cooling hierarchy and Approved Document O.

The development accords with the National Planning Policy Framework and the energy and climate policies of Guildford. There is no energy reason to withhold planning permission.

Key energy information

Item	Value
Site address	45 Epsom Road, Guildford, Surrey GU1 3PF
OS grid reference	TO 00387 49700
Local planning authority	Guildford
Development	Erection of 2no. three-bedroom all-electric houses with air source heat pumps and rooftop PV
Gross internal area modelled	170 m2 (2 dwellings)
Baseline regulated emissions (Part L 2021)	2,225 kgCO2/yr
Be Lean reduction	-21.4%
Regulated emissions after all measures	0 kgCO2/yr
Total on-site carbon reduction	100%
Target applied	Part L 2021 compliance (national requirement)
Target position	Met on site
Heating system	Air source heat pump
Solar PV	12 kWp -> 12,305 kWh/yr (1025 kWh/kWp at this site)
Energy use intensity (incl. unregulated)	50 kWh/m2/yr (benchmark 35)

Site and development description

The application site is located at 45 Epsom Road, Guildford, Surrey GU1 3PF, National Grid Reference TO 00387 49700, within the administrative area of Guildford.

The proposal comprises: Erection of 2no. three-bedroom all-electric houses with air source heat pumps and rooftop PV. For the purposes of the energy assessment the development is modelled as 'Dwelling(s) - houses' of 2 storeys, assessed as new-build floorspace.

Development quantum

Parameter	Value	Note
New dwellings	2 units	
Residential floorspace	170 m2 GIA	
Total site area	620 m2	
Storeys	2	
Roof area for solar PV	72 m2	



Figure 1 - Site location plan (application site outlined red)

Legislation and planning policy context

National policy & Building Regulations Part L

The National Planning Policy Framework requires the planning system to support the transition to net zero by 2050, and new development to help reduce greenhouse gas emissions through location, orientation and design. The regulatory baseline is Part L of the Building Regulations (2021 edition); new dwellings must achieve a 31% reduction in carbon emissions against the previous standard, and new non-domestic buildings 27%, assessed on the Target Emission Rate (TER), Target Primary Energy Rate and - for dwellings - the Target Fabric Energy Efficiency rate, all calculated with SAP 10.2 carbon emission factors (grid electricity 0.136 kgCO₂e/kWh; mains gas 0.210 kgCO₂e/kWh).

This statement demonstrates how the development better the regulatory baseline through the energy hierarchy. The forthcoming Future Homes and Buildings Standards will apply through transitional arrangements once made; this application is assessed against Part L 2021 as the operative baseline, and the fossil-fuel-free servicing strategy already meets the direction of the new standards.

Local and regional energy policy

The development plan of Guildford includes climate change and sustainable design policies requiring new development to reduce carbon emissions through energy-efficient design and renewable energy, alongside the national Part L baseline. The local policy position researched for this site is set out in the planning policy chapter of this statement, and the carbon target adopted for the assessment is stated below. The methodology follows the energy hierarchy - reducing demand first, supplying energy efficiently, then applying renewable technologies - which is the approach local plan policies and government guidance expect an energy statement to take.

Carbon reduction target applied

The carbon reduction target applied in this assessment is: Part L 2021 compliance (national requirement). The development achieves a 100% reduction in regulated carbon dioxide emissions against the Part L 2021 baseline through on-site measures, so the target is met on site.

Local policy notes

The energy and sustainability requirements for new development are set out in the Guildford Borough Local Plan, comprising the Local Plan: Strategy and Sites (2019) and the Local Plan: Development Management Policies (2023). Key policies include Policy D2 (Climate change, sustainable design, construction and energy) from the 2019 plan, alongside Policies D14 (Sustainable and Low Impact Development), D15 (Climate Change Adaptation), D16 (Carbon Emissions from Buildings), and D17 (Renewable and Low Carbon Energy Generation and Storage) from the 2023 plan. Further guidance is provided in the Climate Change, Sustainable Design, Construction and Energy SPD (2024). Policy D16 supersedes previous targets, requiring new buildings to align carbon emission reductions with the 2021 Building Regulations (Part L). The corresponding chapters of this statement respond to each of these requirements.

Emission and primary energy factors applied in this assessment

Energy carrier	Carbon factor	Primary energy factor
Mains gas	0.210 kgCO ₂ e/kWh	1.130
Grid electricity	0.136 kgCO ₂ e/kWh	1.501
Heating oil	0.298 kgCO ₂ e/kWh	1.180
LPG	0.241 kgCO ₂ e/kWh	1.141
Wood pellets (biomass)	0.053 kgCO ₂ e/kWh	1.325
Heat network (gas-fired, incl. distribution losses) *	0.240 kgCO ₂ e/kWh	1.270
Heat network (heat-pump led) *	0.045 kgCO ₂ e/kWh	0.750

Grid electricity, mains gas, oil, LPG and biomass follow SAP 10.2 Table 12. Heat-network rows (*) are stated assessment assumptions for the named network type, applied only where a network connection forms part of the strategy.

Assessment methodology - the energy hierarchy

Method: the energy hierarchy (be lean - use less energy; be clean - supply energy efficiently; be green - maximise renewables), applied across the UK as good practice, quantified against a Part L 2021 notional baseline with SAP 10.2 emission factors and site-specific solar data (PVGIS SARAH3) accessed 22/01/2025.

Modelling approach & baseline

The energy model is a transparent benchmark assessment calibrated to the Part L 2021 notional building specifications for the 'Dwelling(s) - houses' use: the baseline represents the notional building of the same size, form and use - gas heating at 89.5% space / 87% hot water seasonal efficiency, INCLUDING the notional photovoltaic array the 2021 specification requires (Appendix R: 40% of the building footprint at 6.5 m² per kWp, 5.2 kWp here) - with regulated energy disaggregated by end use (space heating, hot water, lighting, pumps and fans).

Emissions are calculated with the SAP 10.2 carbon factors used by Part L 2021. Savings from each stage of the energy hierarchy are then applied cumulatively, in the order the hierarchy requires, so the contribution of each stage can be read directly from the results table. The site's heating climate is characterised by 1,804 heating degree days (base 15.5 °C, 2025 ERA5 reanalysis for these coordinates), consistent with the benchmark space-heating assumptions.

Detailed SAP/SBEM compliance modelling is completed at Building Regulations stage on the approved design; the specifications committed to in this statement are carried into that modelling.

Predicted energy demand

The baseline regulated energy demand of the development is 13,005 kWh/yr across 170 m² GIA: space heating 8,160 kWh/yr, hot water 3,570 kWh/yr, lighting 765 kWh/yr and pumps/fans 510 kWh/yr. On the notional Part L 2021 basis (gas heating with the 5.2 kWp notional PV array credited) this equates to 2,225 kgCO₂/yr of regulated emissions (13.1 kgCO₂/m²/yr). Unregulated energy (appliances and equipment) is additional to the Part L assessment and is reported in the energy use intensity section of this statement.

Grid carbon intensity & emission factors

Emission factors follow SAP 10.2: 0.136 kgCO₂e/kWh for grid electricity and 0.210 kgCO₂e/kWh for mains gas - electricity is now substantially cleaner than gas per delivered kWh, which is why the hierarchy favours electrification of heat. Live regional data corroborates this: the current grid carbon intensity for the South East England region is 229 gCO₂/kWh (high), with a generation mix of gas 54%, imports 22%, wind 21%, nuclear 1%, solar 1% (National Energy System Operator regional data at the date of this assessment). The grid will continue to decarbonise over the life of the development, so the all-electric measures secured in this statement deliver growing carbon savings year on year.

Regulated energy demand by end use

End use	Baseline (Part L notional)	After Be Lean	Saving
Space heating	8,160 kWh/yr	7,181 kWh/yr	12%
Hot water	3,570 kWh/yr	3,570 kWh/yr	0%
Lighting	765 kWh/yr	673 kWh/yr	12%
Pumps & fans	510 kWh/yr	469 kWh/yr	8%

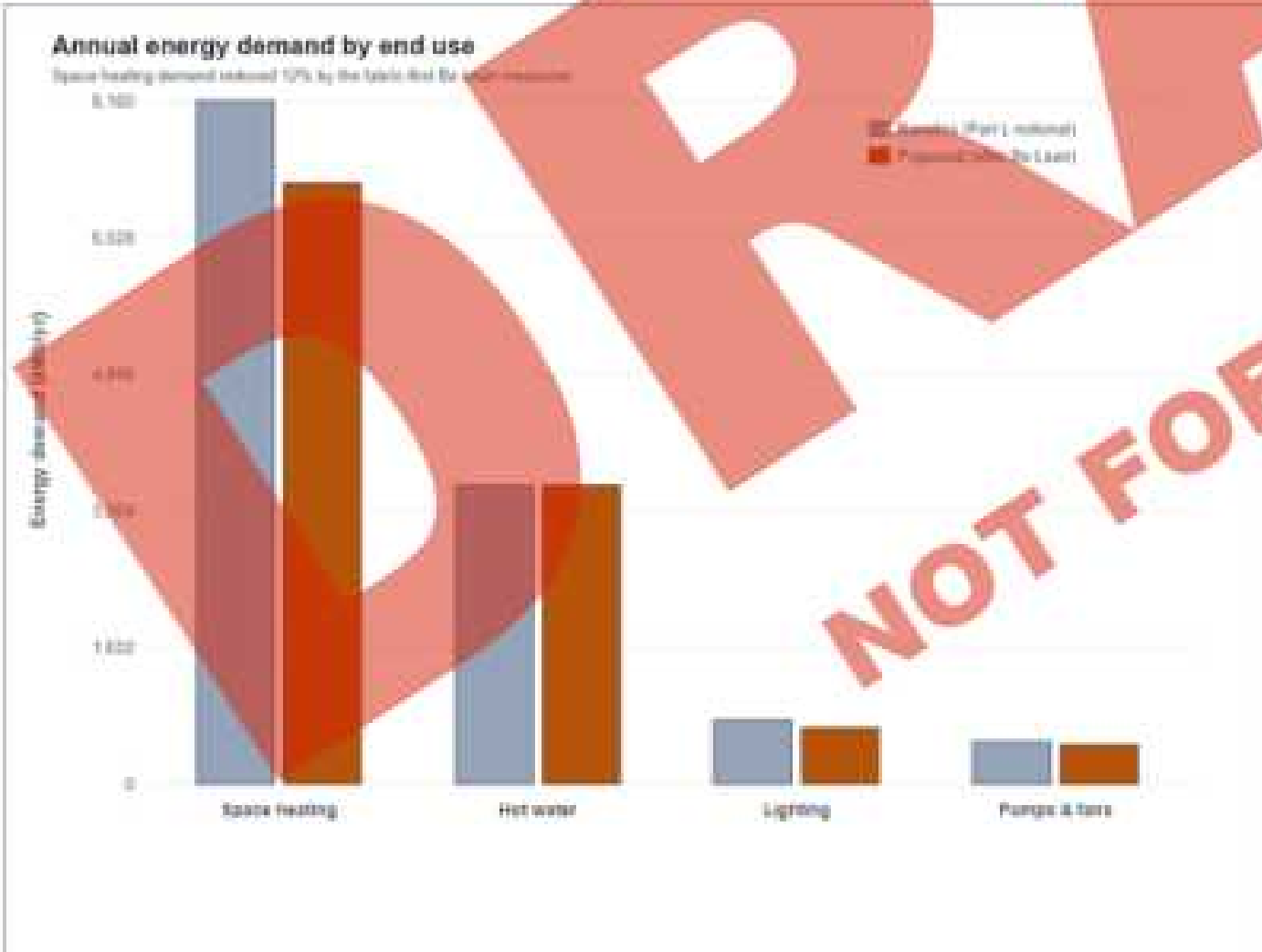


Figure 2 - Annual energy demand by end use - baseline vs proposed

Be Lean - use less energy

Fabric first - insulation & airtightness

The development adopts a fabric-first approach: enhanced fabric. The committed performance is - external walls U <= 0.15 W/m²K, roof U <= 0.1 W/m²K, floor U <= 0.1 W/m²K, windows U <= 1 W/m²K, doors U <= 1 W/m²K, with an air permeability of 3 m³/(h·m²) at 50 Pa. Genuinely better than the Part L 2021 notional specification: thicker wall/roof/floor build-ups, triple glazing and 40% lower air leakage, with accredited junction details (γ <= 0.05). Party junctions and openings are detailed to limit thermal bridging, with continuity of insulation checked at every junction. These measures reduce the space-heating demand of the development by 12% against the Part L 2021 notional fabric.

Glazing & solar control

Glazing is specified at U <= 1 W/m²K (triple glazed) - the value committed in the fabric table of this statement - with a g-value selected to balance winter solar gain against summer overheating. Openings are sized and orientated to provide good daylight without excessive gain; habitable rooms facing within 90° of south receive solar control through the glazing specification, reveal depth and shading provided by the design. This supports both the Be Lean energy savings and the overheating strategy in this statement.

Efficient services, lighting & controls

All fixed lighting is LED with an efficacy of at least 95 luminaire-lumens per circuit-watt, with occupancy and daylight controls in shared and non-domestic areas. Heating is controlled by time and temperature zone controls with weather or load compensation. Pumps and fans are specified with low specific fan powers and variable-speed drives. Hot and cold water pipework is insulated throughout, and metering is provided to each dwelling/tenancy so occupants can see and manage their use. Together with the fabric measures these deliver the Be Lean savings quantified below.

Ventilation & heat recovery

Ventilation is by continuous mechanical extract (Approved Document F system 3), matched to the airtight fabric committed in this statement, with purge ventilation through openable windows. This pairing satisfies AD F for dwellings with an air permeability below 5 m³/(h·m²).

Be Lean carbon savings

The Be Lean measures hold regulated emissions to 2,702 kgCO₂/yr against a baseline of 2,225 kgCO₂/yr. The Part L 2021 notional building includes a photovoltaic allowance, so the pre-renewables position stands 477 kgCO₂/yr above the baseline; that position is recovered in full at the Be Green stage. Space heating demand falls by 12%, lighting energy by 12% and auxiliary energy by 8% against the notional building.

Committed fabric performance (Enhanced fabric)

Element	U-value / performance
External walls	0.15 W/m2K
Roof	0.1 W/m2K
Ground floor	0.1 W/m2K
Windows	1 W/m2K
External doors	1 W/m2K
Air permeability at 50 Pa	3 m3/(h.m2)

Be Clean and Be Green - efficient supply and renewable energy

Be Clean - supply energy efficiently

Heat networks & communal heating

No district heat network is available in the vicinity of the site, and at the scale of this development on-site plant is the efficient servicing solution. The heating strategy therefore moves directly to the Be Green stage of the hierarchy.

CHP position

Gas-fired combined heat and power has been screened out. Under the SAP 10.2 emission factors that Part L 2021 applies, electricity from the grid (0.136 kgCO2e/kWh) is now cleaner than electricity displaced by gas CHP, so CHP increases rather than reduces carbon emissions; it also introduces NOx emissions that weigh against local air quality policy. This position reflects current GLA and industry guidance, which no longer supports gas CHP in new development.

Be Green - renewable & low-carbon energy

Low-carbon heating system

Space heating and hot water are provided by air source heat pump with a seasonal coefficient of performance of 3.5 for space heating and 2.8 for hot water. The plant is selected and located to meet the MCS 020 noise standard at the nearest neighbouring window, uses a low-GWP refrigerant, and serves heating circuits and hot water cylinders sized for low flow temperatures (<= 45 °C), which keeps the heat pump in its efficient operating range. The system removes all on-site combustion: the development's heating is zero-carbon at the point of use and decarbonises further with the grid.

Solar photovoltaics

A 12 kWp solar photovoltaic array is provided on 72 m² of roof area identified for PV. Using the site-specific solar resource from the European Commission's PVGIS service (SARAH3 satellite dataset for these exact coordinates: 1025 kWh/kWp/yr at the standard 35° south-facing reference), the

array generates 12,305 kWh/yr, saving 1.673 kgCO2/yr at SAP 10.2 factors. Panels are laid out within the roof plane, with the inverter located to minimise DC cable runs, and generation metering so output can be monitored. The month-by-month output profile for this site is shown in the figures.

Other renewable technologies screened

Every mainstream renewable and low-carbon technology has been screened for this site: air source heat pumps - adopted; ground source heat pumps - screened - ground area/cost; solar photovoltaics - adopted - 12 kWp; solar thermal - screened - PV preferred on the available roof; wind - screened - unviable urban wind resource; biomass - screened - air quality and fuel logistics; gas CHP - screened - higher carbon than heat pumps under SAP 10.2; heat networks - none within reach of the site. The adopted combination is the one that delivers the greatest regulated carbon saving available to this site within its physical and environmental constraints.

Be Green carbon savings

The Be Green measures reduce regulated emissions from 2,702 to 0 kgCO2/yr - a saving of 2,702 kgCO2/yr at this stage of the hierarchy, of which the PV array contributes 1,673 kgCO2/yr. The cumulative on-site reduction against the Part L 2021 baseline is 100%.

Renewable and low-carbon technology screening

Technology	Position for this site	Screening considerations
Air source heat pumps	Adopted	External plant space; noise limits at boundary (42 dB LAeq at 1 m from a neighbouring window under permitted development / MCS 020)
Ground source heat pumps	Screened - ground area/cost	Needs sufficient external ground for loops or boreholes; higher capital cost than air source for a comparable seasonal performance
Solar photovoltaics	Adopted - 12 kWp	Unshaded roof area; panels within the roof plane or flat-roof arrays set back from the edge
Solar thermal (hot water)	Screened - PV preferred on the available roof	Roof area competing with PV; PV plus a heat-pump cylinder generally outperforms it
Wind turbines	Screened - unviable urban wind resource	Urban/suburban wind speeds and turbulence make building-mounted turbines ineffective; unviable for most sites
Biomass boilers	Screened - air quality and fuel logistics	Fuel storage and delivery access; air quality impacts (PM emissions) generally rule it out in built-up areas and AQMAs
Gas CHP	Screened - higher carbon than heat pumps under SAP 10.2	No longer supported by the energy hierarchy; grid decarbonisation means gas CHP now increases carbon emissions versus heat pumps; also NOx implications
Heat network connection	None within reach of the site	Proximity of an existing or planned district network (screened against the London Heat Map for London sites)

Solar photovoltaic array

Item	Value
Array size	12 kWp on 72 m2 of roof
Site-specific yield (PVGIS SARAH3)	1026 kWh/kWp/yr at these coordinates
Annual generation	12,305 kWh/yr
Carbon saving (SAP 10.2)	1,673 kgCO2/yr

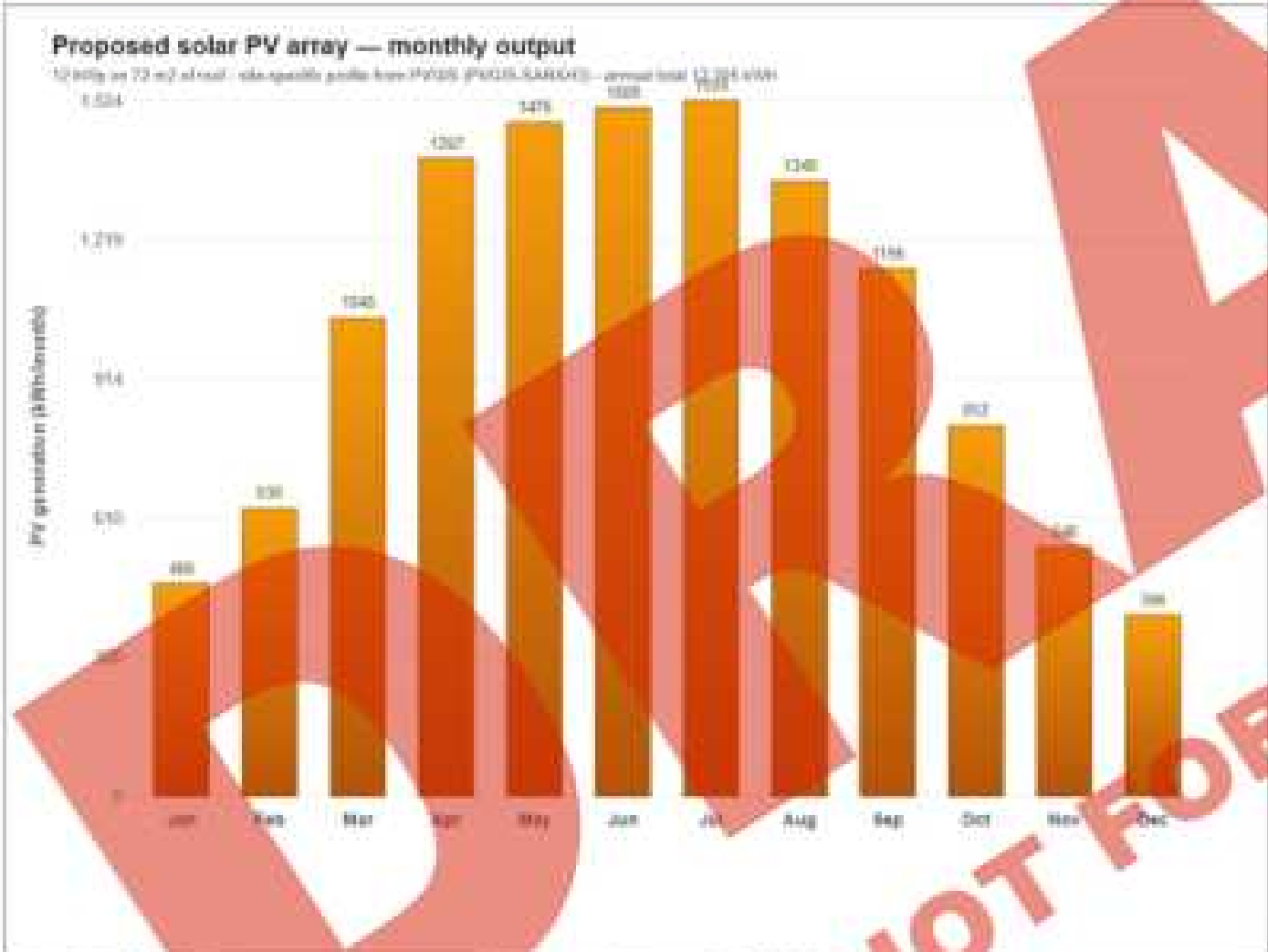


Figure 3 - Monthly output of the proposed PV array (site-specific PVGIS profile)

Results and compliance with the carbon target

Energy hierarchy results

Applying the energy hierarchy in full: the baseline (Part L 2021 notional building) emits 2,225 kgCO2/yr, Be Lean measures hold the pre-renewables position to 2,702 kgCO2/yr, 21.4% above the PV-credited notional baseline; no district heat supply applies at the Be Clean stage; and Be Green

measures bring the development to 0 kgCO2/yr. The total on-site reduction is 100% - 2,225 kgCO2 saved every year. The stage-by-stage results are tabulated and charted in this statement.

Performance against the target

The on-site reduction of 100% meets the applicable target (Part L 2021 compliance (national requirement)). The specifications that deliver this performance - the fabric standards, the air source heat pump and the 12 kWp PV array - are commitments of this statement and are carried through Building Regulations approval and construction.

Carbon shortfall & offset contribution

No carbon offset contribution is required: the target applicable to this development is met through the on-site measures secured in this statement.

Energy use intensity & unregulated energy

The predicted energy use intensity of the development, including unregulated energy (appliances and equipment assessed at 4,080 kWh/yr), is 50 kWh/m²GIA/yr. This sits above the aspirational 35 kWh/m²/yr design benchmark for this building type (GLA guidance / LETI); the benchmark assumes fully electrified heat and lean unregulated loads, and the gap is driven by the conservative unregulated allowance adopted here. The regulated compliance metrics are met as set out in this statement, and the monitoring commitments below track performance in use. Reporting EUI alongside the Part L carbon metric follows CIBSE TM54 practice.

Energy hierarchy results (regulated emissions, SAP 10.2)

Stage	Emissions	Saving at stage	Cumulative reduction
Baseline - Part L 2021 notional building	2,225 kgCO2/yr	-	-
After Be Lean (use less energy)	2,702 kgCO2/yr	-477 kgCO2/yr	-21.4%
After Be Clean (supply energy efficiently)	2,702 kgCO2/yr	-	-21.4%
After Be Green (renewable energy)	0 kgCO2/yr	2,702 kgCO2/yr	100%



Figure 4 - Regulated carbon emissions at each stage of the energy hierarchy

Assessment calculation summary

Parameter	Value
Gross internal area modelled	170 m ² (2 dwellings)
Baseline regulated emissions (Part L 2021 notional, incl. 5.2 kWp notional PV)	2,225 kgCO ₂ /yr (13.1 kgCO ₂ /m ² /yr)
Space heating demand (after Be Lean)	42 kWh/m ² /yr
Be Lean - demand reduction	477 kgCO ₂ /yr above the PV-credited notional baseline (space heating demand down 12%; recovered at the Be Green stage)
Be Green - air source heat pump	Heating fuel: 3,327 kWh/yr (Grid electricity)
Solar PV	12 kWp on 72 m ² → 12,305 kWh/yr at 1025 kWh/kWp (PVGIS, this site)
Total carbon reduction vs the Part L baseline	100% (2,225 kgCO ₂ /yr)
Target applied	Part L 2021 compliance (national requirement)

Parameter	Value
Target position	MET on site
Energy use intensity (incl. unregulated)	50 kWh/m ² /yr (design target benchmark 35)

Overheating and the cooling hierarchy

Approved Document O (2021) applies to the new residential accommodation; the cooling hierarchy is applied so comfort is delivered by design before any active cooling is considered.

Cooling hierarchy

The cooling hierarchy has been applied in sequence: (1) heat gains are minimised through the glazing specification, g-values and shading set out in the Be Lean section; (2) the proportion and orientation of glazing balances daylight against summer gain; (3) exposed thermal mass and ceiling heights moderate peak temperatures where the construction allows; (4) passive ventilation - openable windows arranged for cross-ventilation wherever the layouts allow - provides the cooling pathway; (5) mechanical ventilation supports air movement where passive means are constrained; and (6) active cooling is not required and is not provided.

Overheating compliance (Part O)

The dwellings comply with Approved Document O (2021): the design follows the simplified method where the location and cross-ventilation allow, with dynamic modelling (CIBSE TM59) applied to any unit that the simplified method cannot clear, limiting glazed areas by orientation and securing the free areas needed for purge ventilation. Compliance is demonstrated at Building Regulations stage on the approved layouts, with the measures in the cooling hierarchy above as the means of compliance; noise and security constraints on window opening are accounted for in the assessment.

Monitoring, conditions and conclusions

Energy monitoring

Energy performance is monitored in use: smart meters are provided to every dwelling, PV generation is metered separately. This gives occupants and the operator the information needed to keep performance in line with the predictions in this statement.

Recommended planning conditions

The following planning conditions secure the energy strategy and are offered for the council's use: (1) the development shall be carried out in accordance with the energy specifications set out in this Energy Statement - the committed fabric U-values and air permeability, the air source heat pump and the 12 kWp solar PV array - and those measures shall be installed before first occupation and retained thereafter; (2) evidence of the as-built energy performance (the as-built SAP output) shall be submitted to the local planning authority prior to first occupation.

Conclusion - policy compliance

The development applies the energy hierarchy in full and achieves a 100% reduction in regulated carbon emissions against the Part L 2021 baseline, meeting the applicable target on site. The development accords with the National Planning Policy Framework and the energy and climate policies of Guildford. There is no energy reason to withhold planning permission for this development.

Stage	Committed measure
Be Lean	Fabric: walls $U_{\text{c}}=0.15$; roof $U_{\text{c}}=0.1$; floor $U_{\text{c}}=0.1$; windows $U_{\text{c}}=1$ W/m ² K; air permeability 3 m ³ /h.m ²
Be Lean	100% LED lighting with controls; low specific fan powers; insulated pipework; ventilation to Approved Document F
Be Green	Air source heat pump (SCOP 3.5)
Be Green	12 kWp solar PV array with generation metering, installed before first occupation
Overheating	Cooling hierarchy applied; Approved Document O compliance demonstrated on the approved layouts
Monitoring	Smart metering to every dwelling; PV generation metering

Data sources and basis of assessment

Dataset / service	Publisher	Access
PVGIS solar resource & PV yield (SARAH3 satellite dataset)	European Commission Joint Research Centre	re.jrc.ec.europa.eu/pvg_tools
Regional grid carbon intensity & generation mix	National Energy System Operator / Carbon Intensity API	api.carbonintensity.org.uk
Historical temperature data for degree-day analysis (ERA5)	Copernicus / Open-Meteo	open-meteo.com
Postcode geocoding & local authority lookup	postcodes.io (ONS ODS open data)	api.postcodes.io
Address geocoding	OpenStreetMap Nominatim	nominatim.openstreetmap.org
Base mapping	OpenStreetMap contributors	openstreetmap.org

All datasets were accessed on 22 January 2025. Contains public sector information licensed under the Open Government Licence v2.0: solar resource data (c) European Commission JRC (PVGIS); base mapping (c) OpenStreetMap contributors.

Guidance applied

- HM Government (2021, as amended) Approved Document L – Conservation of fuel and power, Volumes 1 and 2 (2021 edition incorporating 2023 amendments)

- BRE (2022) The Government's Standard Assessment Procedure for Energy Rating of Dwellings, SAP 10.2; DLUHC National Calculation Methodology (SBEM) for non-domestic buildings
- HM Government (2021) Approved Document O – Overheating
- CIBSE (2017) TM53 Design methodology for the assessment of overheating risk in homes; CIBSE TM54 (2022) Evaluating operational energy use at the design stage
- LETI (2024) Climate Emergency Design Guide; RIBA (2021) 2030 Climate Challenge (v2)
- National Planning Policy Framework (current edition), chapter 14 – Meeting the challenge of climate change

Basis of assessment

- This is a professional energy statement prepared for planning purposes, applying the energy hierarchy methodology that national guidance and development plan policies expect, with the SAP 10.2 emission factors used by Part L 2021
- The energy model is a transparent benchmark assessment calibrated to the Part L 2021 national building specifications for the assessed use, with the solar contribution computed from the PVGIS SARAH3 satellite dataset for the site's exact coordinates. Detailed SAP/SBEM compliance modelling is completed at Building Regulations stage on the approved design, carrying the specifications committed in this statement.
- The fabric standards, servicing strategy and renewable energy provision stated in this report are commitments of the application and are written so the local planning authority can secure them by condition.
- The statement addresses energy and carbon; flood risk, ecology and other environmental matters are covered by the other application documents.

Closure

This Energy Statement demonstrates that the proposed development applies the energy hierarchy in full and achieves a 100% reduction in regulated carbon emissions against the Part L 2021 baseline, meeting the applicable target on site. The development accords with the National Planning Policy Framework and the development plan. There is no energy reason to withhold planning permission.

Prepared by
Fortress Associates
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