Passivhaus Trust Consultation Response

Draft London Plan, Chapter 5: Creating a greener, resilient and healthy (GHR) city

05 October 2026

Introduction

This summary document sets out the PHT responses to the **Draft London Plan 2026, Chapter 5: Creating a greener, resilient and healthy (GHR) city**

Supporting documents available online at: https://www.london.gov.uk/programmes-strategies/planning/london-plan/next-london-plan/draft-london-plan-consultation/draft-london-plan-consultation-resources

The deadline for responses is 5pm on **Thursday 15 October 2026.**

PHT Position

For an overview of the Passivhaus Trust position: https://bit.ly/PHTDraftLondonPlan

GHR1: Energy Efficiency

Consultation Question 4

☐ Yes

☐ No

Q16 - Passivhaus Trust (PHT) Response

The Passivhaus Trust welcomes the direction of travel set out in the Draft London Plan and, in particular, the recognition that London needs building performance standards that go beyond the minimum requirements of the national Building Regulations in order to meet its climate targets, as set out in paragraph 5.19.

The Trust strongly supports the proposed approach to building performance and welcomes the introduction of absolute space heating demand (SHD) and energy use intensity (EUI) targets. Absolute performance targets provide a clear and consistent basis for setting expectations for building performance. They also provide greater clarity for design teams and clients, are more readily comparable with measured in-use performance and provide a more robust basis for future-proofing than approaches based solely on comparison with a notional building.

The use of absolute targets is consistent with the direction of travel established by organisations and initiatives including LETI, RIBA, the Passivhaus Trust and the UK Net Zero Carbon Buildings Standard (UKNZCBS), and is supported by organisations including BRE, CIBSE, RICS and UKGBC.

Space heating demand targets

The proposed space heating demand targets represent a strong level of building performance and align closely with targets promoted by Passivhaus, LETI and the UKNZCBS, particularly where the more ambitious 15 kWh/m^2/year target is achieved.

The Trust particularly welcomes the recognition that space heating demand is influenced by the form, fabric and ventilation strategy of a building. This provides a more meaningful measure of building performance than an approach based solely on compliance with a notional building.

However, achieving these levels of performance in practice requires attention to the design and construction processes that underpin them. The Passivhaus Standard, for example, combines energy performance targets with requirements and processes relating to airtightness, thermal bridging, ventilation, quality assurance and verification. These measures are important because performance targets need to be supported by a delivery process capable of achieving them reliably in practice.

The Draft London Plan acknowledges the relationship between building form, fabric and ventilation and SHD, but the Trust considers that additional requirements or guidance on design quality assurance, verification and delivery would strengthen the policy and improve confidence that the proposed targets will be achieved in practice.

For example, third-party verification and certification, together with defined project gateways, could provide a robust mechanism for demonstrating that the design intent is being maintained through detailed design and construction. This would be particularly valuable where the more ambitious SHD target is being pursued.

For higher-risk buildings, this approach could also be aligned with the Building Safety Regulator (BSR) gateway process, using the established principle of defined regulatory gateways at key stages of design and construction. While the BSR gateways address building safety rather than energy performance, the same staged approach could be used to provide assurance that energy-performance requirements are incorporated into the design, verified during construction and demonstrated at completion. The Trust suggests a policy incentive could be applied where an independent quality assured process is applied to demonstrate early confidence in achieving energy targets. For example, in Scotland it is proposed that Passivhaus Certification is 'deemed to satisfy' elements of the building regulations in recognition of the independent verification and quality assurance process. In Vancouver Canada the use of a verified route, such as Passivhaus, allows for increased more floor area allowance for development. https://vancouver.ca/green-vancouver/zero-emissions-buildings-tools.aspx

Energy Use Intensity

The Trust strongly welcomes the introduction of an EUI target incorporating both regulated and unregulated energy use. This is an important development because it provides a more complete measure of a building's operational energy performance.

A clear definition of 'unregulated energy' should, however, be provided as part of the policy or supporting guidance. Industry understanding and modelling of unregulated energy is less mature and consistent than for regulated energy. Without a sufficiently clear definition, there is a risk of inconsistent modelling assumptions and therefore inconsistent assessment of compliance.

The Trust also notes that some of the proposed EUI targets are more demanding than the limits currently proposed within the UKNZCBS, both in the near term and in some cases over the longer term. For example, the proposed 40 kWh/m^2/year baseline EUI target for residential buildings is more demanding than the UKNZCBS apartment limit of 50 kWh/m^2/year proposed for 2027 and remains more demanding than the 40 kWh/m^2/year limit proposed for 2050.

The Trust supports ambitious EUI targets but recommends that the proposed figures are reviewed against the wider trajectory being established for the UK Net Zero Carbon Buildings Standard, to ensure that the London Plan targets are both ambitious and appropriately aligned with the emerging national framework. At current levels in the market there is a risk that the construction sector may not be able to deliver these targets for all buildings in a quality assured manner.

The Passivhaus standard may be a suitable alternative target to guarantee performance, because of the independent verification process, and it may offer some robust flexibility around achieving the EUI numbers. We therefore suggest Passivhaus Classic could be included within the London Plan as " deemed to satisfy" as an alternative compliance pathway.

It is also important to recognise that operational energy use is influenced by occupancy and patterns of use. The assumptions regarding occupancy therefore need to be clearly defined and consistently applied when modelling compliance. Otherwise, differences in assumed occupancy could materially affect predicted EUI and make comparisons between projects less meaningful.

Clearer modelling and compliance guidance

The success of the proposed targets will depend significantly on how they are modelled and demonstrated and verified. The Trust therefore recommends that the GLA provides clear and consistent guidance on the methodology for demonstrating compliance.

This should establish, in particular:

- the permitted modelling methodologies and tools;
- the weather files to be used;
- the treatment of occupancy and operational assumptions;
- the floor area definition to be used when calculating EUI and SHD;
- the treatment and definition of unregulated energy;
- how modelling should account for future climate conditions where relevant; and
- how the energy model should interface with overheating and climate-resilience assessments required elsewhere in the London Plan.

Consistency in these areas is essential if absolute performance targets are to provide meaningful and comparable outcomes across projects.

The Trust also recommends that Passivhaus Planning Package (PHPP) should be explicitly recognised as an acceptable modelling methodology for compliance. Where a project is being designed using PHPP, requiring the same building to be modelled again in another software package risks unnecessary duplication, additional cost and discrepancies between models.

This approach would be consistent with the direction of travel in the proposed Scottish Passivhaus Equivalent Consultation process, which considers PHPP as an alternative modelling methodology. It is also consistent with the London Plan's existing carbon reporting pro-forma, which includes PHPP as an acceptable route for deriving EUI estimates.

More broadly, the policy should make clear that project-specific energy modelling is fundamental to demonstrating actual building performance. Compliance reporting should not rely solely on standardised compliance models or reports such as BRUKL, which are designed primarily to demonstrate regulatory compliance rather than to provide a sufficiently detailed prediction of actual operational energy use. Further modelling should be undertaken for example with TM54 assessment or PHPP, which allow the entry of up-to-date data on accurate unregulated energy values (avoiding reliance on out-of-date benchmarking).

Design quality, verification and delivery

The proposed SHD targets should be considered alongside the design and construction measures needed to achieve them.

A target of 15 kWh/m^2/year, in particular, cannot be treated simply as an outcome of specification selection. Building form, thermal envelope, airtightness, thermal bridging, ventilation efficiency, glazing, solar gains and construction quality all contribute to the final outcome.

The Trust therefore recommends that the GLA strengthens the policy by setting out clear expectations for quality assurance and verification, rather than relying solely on the calculated performance at design stage.

A structured verification process would help to ensure that the performance predicted by the energy model is carried through into construction and commissioning. Passivhaus certification provides one established example of such an approach, combining performance criteria with detailed design processes, quality assurance and independent verification. The Trust suggests a policy incentive could be applied where an independent quality assured process is applied to demonstrate early confidence in achieving energy targets. For example, in Scotland it is proposed that Passivhaus Certification is ‘deemed to satisfy’ elements of the building regulations in

recognition of the independent verification and quality assurance process. In Vancouver Canada the use of a verified route, such as Passivhaus, allows for increased more floor area allowance for development. https://vancouver.ca/green-vancouver/zero-emissions-buildings-tools.aspx

Monitoring and disclosure of in-use performance

The Passivhaus Trust strongly supports and welcomes the requirement for developments to monitor and report annual in-use energy demand for at least five years following completion.

This is an important step towards closing the gap between predicted and actual building performance and creating a stronger evidence base for future policy and design.

The policy should, however, provide greater clarity on how this requirement will operate in practice, including:

- who is responsible for collecting and reporting the data;
- when monitoring should commence;
- the metering arrangements and data quality requirements;
- the methodology for calculating EUI and SHD;
- how occupancy and changes in building use should be accounted for; and
- who will receive and manage the data.

The Trust also recommends that appropriately anonymised in-use performance data should be made publicly available. This would create a valuable evidence base for future projects and allow the industry to understand how different design approaches perform in operation.

As well as EUI and SHD, the Trust recommends consideration of reporting peak electrical demand at appropriately short measurement intervals. Such data would provide valuable information for infrastructure planning and could help inform future electricity network and utility connection requirements.

Baseline and aspirational targets

The policy would benefit from making the distinction between the baseline and aspirational targets completely explicit.

The GLA should clearly state that the baseline target represents the required policy standard for all applicable projects, while the aspirational target represents an enhanced level of performance that is encouraged but is not an additional compliance requirement.

This distinction would avoid uncertainty for applicants and planning authorities while retaining a clear mechanism for encouraging higher levels of performance.

The Trust also suggests that the GLA consider whether planning or other incentives could be used to encourage delivery of the aspirational target. Such incentives could provide a practical mechanism for encouraging developers to move beyond the minimum policy requirement where higher performance can be demonstrated.

Winter and summer performance

Finally, low-energy building policy should address winter and summer performance together.

Reducing space heating demand is important, but buildings must also provide comfortable and resilient conditions during periods of high summer temperatures and future heatwaves. The policy should therefore ensure that the pursuit of low heating demand does not inadvertently create overheating or excessive cooling requirements.

Certified Passivhaus developments should be expected to demonstrate how solar gains, shading, ventilation, cooling demand and future climate resilience have been considered as part of the overall design strategy.

A genuinely high-performing building should therefore be one that delivers low energy use while maintaining acceptable internal conditions throughout the year and under future climate conditions.

Summary

Overall, the Passivhaus Trust strongly supports the direction of the Draft London Plan and, in particular, its move towards absolute space heating demand and EUI targets and the monitoring of actual in-use energy performance.

The key opportunity now is to ensure that the policy is supported by sufficiently clear definitions, modelling methodologies, verification processes, quality assurance requirements and in-use monitoring arrangements. These measures would give developers and project teams greater certainty, improve consistency of implementation and increase confidence that the ambitious performance targets proposed by the London Plan will translate into measurable improvements in actual building performance. An effective way to achieve this would be for the London Plan to adopt a similar approach to what the Scottish Government is proposing and accept Passivhaus certified projects as 'deemed to satisfy' the energy efficiency requirements of the London Plan.

GHR2: Low-cost low-carbon heat

Consultation Question 5

☐ Yes

☐ No

Q16 - Passivhaus Trust (PHT) Response

The Passivhaus Trust welcomes the requirement for major developments to undertake a Low Carbon Heat Appraisal to identify the lowest-cost, lowest-carbon heating solution for each proposal. We particularly welcome the move away from an assumption that developments should connect to a heat network and towards an evidence-based assessment of the most appropriate solution for the individual site.

The requirement to consider upfront, whole-life and end-user costs is also welcome. The Trust considers this an important improvement because the lowest upfront-cost solution, the lowest whole-life-cost solution and the lowest-carbon solution will not necessarily be the same. For example, direct electric panel heating may have a lower upfront capital cost than a heat pump, but this does not make it the lowest-carbon or necessarily the lowest-cost solution over the lifetime of the building.

The Trust would expect high-performance buildings, including certified Passivhaus developments, to frequently demonstrate a very low-carbon and cost-effective heating solution, because their exceptionally low heat demand reduces the need for large heating systems and can make individual low-carbon systems particularly appropriate.

The Low Carbon Heat Appraisal tool

Without having seen the proposed Low Carbon Heat Appraisal tool, the Trust is not yet able to comment on its methodology or assumptions in detail. We welcome, however, the stated intention to provide "more flexibility and an objective approach to identifying the best solution."

The Trust strongly recommends that the GLA makes the appraisal tool available to industry at an early stage and tests its assumptions and outputs with a representative range of industry stakeholders before the policy is adopted.

This testing should include highly energy-efficient buildings such as Passivhaus, where heat demand can be substantially lower than that assumed by more conventional building models. The tool should be capable of recognising how improved fabric efficiency changes the economics and carbon performance of different heat supply options.

Define what constitutes low-carbon heat

The policy should provide greater clarity on what constitutes an acceptable heating source under GHR2.

In particular, the GLA should clarify:

- whether gas-fired heat is ever considered an acceptable outcome of a Low Carbon Heat Appraisal;
- what carbon factors should be applied to different heat sources;
- how existing gas-fired heat networks are treated;
- what decarbonisation trajectory is expected for heat networks that currently use gas; and

- whether a defined date or performance threshold will apply by which gas-fired heat networks must transition to low-carbon heat sources.

This is particularly important because the current policy requires the appraisal to identify the optimum solution, while the wider policy framework anticipates the continued development and decarbonisation of heat networks. The GLA should ensure that a connection to an existing network cannot be treated as a low-carbon outcome without consideration of its actual and future heat source. The Mayor's supporting material already recognises that existing heat networks using gas will need to develop and implement decarbonisation strategies.

The appraisal must take place before planning permission

The Low Carbon Heat Appraisal should be completed before planning permission is granted and should not routinely be deferred to a planning condition.

The heating strategy is a fundamental part of the building's design. It affects plant-room requirements, risers, distribution systems, penetrations through the building envelope, electrical infrastructure, spatial coordination and M&E procurement.

Changing the heating strategy after planning permission has been granted can therefore require substantial redesign, potentially at a point when detailed design is advanced or construction costs have already been fixed. This creates avoidable cost and programme risk and could make it significantly harder to deliver the optimum low-carbon solution identified by the appraisal.

The heating strategy should therefore be established early enough to inform the building design, rather than being treated as a subsequent compliance exercise.

Heat-network readiness and the cost of future connection

The Trust has particular concerns about paragraph D of GHR2, which states that development proposals generating waste heat should incorporate design and specifications to optimise the opportunity for heat capture, storage and distribution infrastructure to enable cost-effective and timely heat supply to an existing or future heat network.

The principle of enabling genuine opportunities for waste-heat utilisation is supported. However, the **c**ost and proportionality of requirements for future heat-network connection need to be explicitly addressed.

Requiring a development to install or incorporate infrastructure for connection to a heat network that may not ultimately be delivered could impose significant costs on developers and, ultimately, occupants. Those costs may be incurred without any certainty that the infrastructure will ever be used.

Where future connection is required, the policy should therefore establish clear limits, including:

- a defined maximum scope of works or cost;
- a clear timeframe within which a future connection is expected;
- a clear end date after which further heat-network-readiness requirements would lapse; and
- an appropriate mechanism for recovering or avoiding costs where the anticipated network connection does not proceed.

The policy should avoid creating an open-ended obligation to fund infrastructure for a future network with uncertain delivery.

Passivhaus and heat-network connection

The Trust considers that the particularly low heat demand of certified Passivhaus buildings warrants a specific policy approach.

For a building with very low space-heating demand, the case for connection to a communal or district heat network should be tested carefully against alternative low-carbon solutions. Heat-network distribution losses, standing charges, metering and billing arrangements, connection costs and system-management costs can become proportionally more significant as the building's useful heat demand falls.

The Low Carbon Heat Appraisal should therefore explicitly account for the very low heat demand of high-performance buildings and should assess the total cost and carbon consequences of connection rather than treating connection itself as the preferred outcome.

The Trust considers that, in many cases, an efficient individual low-carbon heating system may be more appropriate for a certified Passivhaus building than connection to a heat network. This could include appropriately sized heat pumps and, where technically appropriate, systems such as exhaust-air heat pumps.

The principle should be that heat networks are used where they provide a demonstrable cost and carbon benefit, rather than where connection is pursued irrespective of the building's actual heat demand.

Avoiding conflict between GHR1 and GHR2

There is also a potential interaction between GHR1 Energy Efficiency and GHR2 Low-cost low-carbon heat that should be addressed explicitly.

GHR1 establishes absolute building energy performance targets, including EUI. GHR2 may, in some circumstances, lead a development towards a communal or district heat network. Depending on the system boundary and methodology used to calculate EUI, energy losses associated with heat distribution could affect the reported energy performance of a development.

This creates a potential risk that a heating solution required or strongly encouraged under GHR2 could make it more difficult for a project to meet the absolute EUI targets established under GHR1.

The GLA should therefore ensure that the GHR2 appraisal methodology and GHR1 EUI methodology are fully aligned, with clear treatment of heat-generation and distribution losses. Developers should not be placed in a position where compliance with one policy creates a direct or unintended barrier to compliance with another.

The Low Carbon Heat Appraisal tool provides an opportunity to address this interaction explicitly before the policy is finalised.

Heat networks should be targeted where they provide the greatest benefit

The Trust supports the development of efficient, genuinely low-carbon heat networks where they provide a clear system-level benefit. However, the case for a heat network is not identical for every building.

The very low heat demand achievable through Passivhaus and other high-performance fabric approaches changes the balance between centralised and individual heating systems.

Heat networks can provide particular value where there is sufficient heat demand or anchor load to support efficient infrastructure and where low-carbon or waste heat sources are available.

The Trust therefore recommends that heat networks are prioritised where they can demonstrate a strong strategic, carbon and economic case, including in buildings with substantial and consistent heat demand, rather than treating connection as the default for buildings whose heat demand has already been minimised through excellent fabric efficiency.

This would also avoid creating a perverse incentive whereby improving a building's fabric efficiency and reducing its heating demand makes the resulting project less economically attractive because it is nevertheless required to fund connection to a large communal or district heating infrastructure.

Passivhaus certification should provide a clear route to exemption

The Trust recommends that the London Plan provides clear policy recognition for certified Passivhaus developments within the Low Carbon Heat Appraisal and heat-network connection framework.

The Trust's position is that where a development achieves full Passivhaus certification, this should provide a clear and preferably automatic route to exemption from heat-network connection or future heat-network-readiness requirements, subject to the requirements of applicable national heat-network zoning legislation.

This recommendation is consistent with the emerging national approach, which provides for exemptions where a building already has a low-carbon heating solution or where connection is less appropriate than another low-carbon solution.

Passivhaus certification provides independently verified evidence of exceptionally low energy demand and a rigorous approach to building performance. Where that performance has been achieved, requiring a project to connect to a heat network should therefore require a clear evidence-based justification.

The Trust recommends that the GLA establishes a simple and predictable exemption route, rather than requiring every certified Passivhaus project to undertake a lengthy or uncertain case-by-case process where the building's exceptionally low heat demand is already independently demonstrated.

Protecting Passivhaus projects from unintended policy conflicts

A number of Passivhaus Trust members have raised concerns that uncertainty around heat-network connection requirements is becoming a potential barrier to Passivhaus projects in London.

The Trust has also received sector feedback indicating that some planning applicants have encountered situations where connection to a heat network has been pursued despite concerns about the network's carbon performance relative to alternative on-site low-carbon heating solutions.

The Trust considers that these experiences reinforce the need for clear, objective and transparent decision-making based on actual carbon and cost performance.

Projects should not be required to connect to a heat network unless the evidence demonstrates that doing so provides a genuine benefit, taking account of the building's heat demand, the network's heat source, distribution losses, capital and operating costs, end-user costs and the network's future decarbonisation pathway.

Recommendation

The Passivhaus Trust strongly recommends that the GLA provides absolute clarity within the London Plan that certified Passivhaus developments will have a defined route to exemption from heat-network connection and future heat-network-readiness requirements

Ideally, full Passivhaus certification should provide an automatic exemption, subject to the requirements of national heat-network zoning legislation. At a minimum, certification should create a presumption in favour of exemption, with any decision to require connection supported by clear evidence from the Low Carbon Heat Appraisal.

Any exemption should be secured through a planning condition or obligation requiring full Passivhaus certification, rather than through a less precise commitment to designing or constructing a building to "Passivhaus principles". This would provide the GLA, planning authorities, developers and occupants with a clear and independently verifiable basis for the exemption.

The Trust believes this approach would better align GHR1 and GHR2, reduce uncertainty for developers, avoid unnecessary infrastructure costs, and ensure that London achieves both very low building energy demand and genuinely low-carbon heat, rather than treating connection to a heat network as an objective in itself.

GHR3: Whole life-cycle carbon

Consultation Question 6

☐ Yes

☐ No

Q16 - Passivhaus Trust (PHT) Response

Although embodied carbon of building materials is not addressed directly within the Passivhaus standard, it is something that is increasingly considered by Passivhaus Designers. For example, PHribbon is an adaptation of PHPP (Passivhaus Planning Package) that looks at Whole Life Carbon.

As the London Plan rightly points out, "*As the electricity grid decarbonises and operational emissions reduce, embodied carbon has become a larger proportion of the carbon emissions associated with the built environment.*"

The Passivhaus Trust, therefore, welcomes and applauds the London Plan's calls for developments to calculate and reduce upfront embodied and whole life carbon emissions.

GHR4: Heat risk

Consultation Question 7

☐ Yes

☐ No

Q16 - Passivhaus Trust (PHT) Response

The Passivhaus Trust strongly supports the solutions set out in this section, which closely align with Passivhaus summer comfort strategies. In particular, we support the statements that applicants for major development should demonstrate how the design maximises passive design measures and minimises the energy associated with cooling, and that lower-energy and lower-cost mechanical measures should be considered after passive measures have been prioritised, with active cooling considered where need has been demonstrated.

In many cases , the use of active cooling is likely to form part of a wider overheating mitigation strategy, particularly where a building also meets or exceeds the space heat demand and EUI targets set out in GHR1. Where active cooling is required, it should be highly efficient, low-carbon and justified through a robust overheating risk assessment, with passive measures explored and investigated first.

In energy-efficient homes such as Passivhaus buildings, cooling loads are minimised, making it possible to provide cooling discreetly, for example through a small, efficient unit. TM59 provides a useful framework for overheating risk assessments.

The Trust welcomes the Heat Risk Plan published by the GLA as a methodology of approaching overheating https://www.london.gov.uk/programmes-strategies/environment-and-climate-change/climate-change/climate-adaptation/heat-risk/heat-ready-london . The Passivhaus Standard includes detailed guidance covering design strategies to reduce risk, limitations, and constraints that may have an impact, key indicators of the likelihood of risk, and a series of stress tests to demonstrate robustness. Summer comfort stress testing is an integral part of PHPP. We recommend that the GLA should require all projects to take a similar level of stress testing of the design from early stages through to detailed design to limit overheating risk at first principles stagesSome fixed assumptions used for compliance assessments may be less appropriate for assessing future climate resilience. For example, assumptions about window-opening behaviour driven solely by internal air temperature may not reflect occupant behaviour during heatwaves, when windows may need to remain closed if external temperatures exceed internal temperatures. Modelling should therefore consider realistic occupant behaviour under future weather conditions.

Projects should demonstrate compliance with the relevant legislative requirements, using the appropriate assessment methodology, including dynamic modelling and TM59 for larger projects where applicable. They should then be tested against a wider range of weather scenarios, including DSY2, DSY3 and 2080s weather files. Modelling should use the default TM59 profiles and assumptions, or reasonable alternative assumptions agreed with the client. Results should be presented in an accessible form, clearly setting out the overheating risk under the different climatic scenarios. Clients should confirm that they understand the expected performance and behaviour of the design and are satisfied with the identified risk profile.

We recognise that this approach goes beyond the scope of a conventional compliance assessment. However, considering future weather scenarios is important to support the delivery of resilient, energy-efficient buildings across Greater London that remain suitable for occupants over coming decades, and comply with incoming and evolving requirements on Awaabs Law and other evolving consumer protection legislation

Finally, the proposed reduction in minimum floor-to-ceiling height from 2.5m to 2.4m, referenced in Draft London Plan Policy 3.108, may have implications for the space required to accommodate larger or better-insulated ductwork associated with cooling provision through MVHR or other systems. The GLA may wish to explore this interaction in greater depth, and the Passivhaus Trust would be happy to assist with this work.

GHR10: Air quality

Consultation Question 13

☐ Yes

☐ No

Q16 - Passivhaus Trust (PHT) Response

In response to Point E3 above, 'incorporating measures that appropriately reduce exposure to poor external or external air quality', Passivhaus homes and buildings have consistently good indoor air quality, thanks to the use of mechanical ventilation with heat recovery (MVHR). Pollutants from external air are filtered (G7 filters in particular are designed to catch particulates) before

entering a Passivhaus home or building. Passivhaus buildings can therefore reduce pollution exposure in buildings where external air pollution is high.

As an example, the Passivhaus certified Mulberry Academy secondary school has been designed in a busy and compact urban location in the Docklands area of London. The school is situated moments away from Tower Bridge, the Tower of London, St Katharine Docks and the City. Passivhaus was chosen for the project to counter the problems of air pollution, thanks to the excellent indoor air quality it offers. The improved airtightness, and use of MVHR to draw in fresh air from 5 storeys above ground was essential for this. https://www.passivhaustrust.org.uk/news/detail/?nId=1298