

## **Draft Climate Change and Sustainable Construction SPD Consultation Response**

The SPD could greatly benefit from being more compact, with all references etc. consigned to an appendix and thus leaving Sections 3 and 4 as the primary sections for review. The document lacks an executive summary laying out the key objective of the SPD and the actions called for. Section 4 has a mix of clear objectives (e.g. numerical targets), and objectives with wording that is vague and aspirational and thus cannot be measured or enforced.

Overall the document should be restructured such that it is clear what is being asked for; how EHDC will apply those measures; and how EHDC will ensure compliance. The executive summary should also include a list of the accrued benefits if these measures were applied, i.e. assuming 300 new homes are built to the new standard this will result in a  $x\%$  reduction in CO<sub>2</sub> etc.

Whilst this SPD is full of good words, it lacks substance regarding Passive design. The policy should require certification from Passivhaus schemes. This ensures that the measures taken are effective and, without this, many properties will continue to fall below the planning standards as there is no regulation of the post occupancy performance.

In terms of Biodiversity, this should also be subject to post occupancy evaluation to confirm that a 10% net gain had been achieved at 5 years after occupation.

The ambition for this is not very high, given the duration of this plan, and as a scheme approved at the end could be built in 2029 the targets should be closer to Net Zero and full Passive design.

The SUDS section is limited. There should be stronger wording to promote Blue / Green drainage solutions rather than SUDS. There is a useful reference to CIRIA which produced a good manual, however house builds still like using simple underground tanks.