

With regard to Policy NZC2(A), this policy should only apply where it is relevant for it to do so. As it is currently worded, the policy requires certification to a nationally recognised standard (for energy performance) to be submitted with all full applications, alongside Reserved Matters, Section 73 and Section 96a (Non-Material Amendment) applications.

However, some applications, specifically the Reserved Matters, Section 73 and 96a applications, may not relate to the building or sustainability of a scheme. If it is irrelevant to the consideration of an application, then the submission of the certification should not be required. In order to provide this flexibility, “*Where relevant*” should be inserted at the start of paragraph 4 of the Policy, to read:

*“Where relevant, certification to a nationally recognised standard to demonstrate the predicted energy performance across the entire development should be provided as part of any reserved matters application, full application Section 73 application or Section 96a (non material amendment) application, to evidence the passive and energy efficient design for building performance.”*

It is positive that Policy NZC2(A) is not prescriptive as to which standard is used (when assessing the potential energy performance of a building), provided that it is widely recognised, as this enables the policy to remain current throughout the lifetime of the DPD, during which it is probable that new standards and methodologies for calculating efficiencies will be introduced.

Overall, we agree with the Council’s approach to addressing the climate emergency. The policies generally incorporate flexibility, but we believe that Policy NZC2(A) should include clarification on the need to include information regarding energy performance, only where relevant to do so.

I trust that the above representation is in order and will be considered as part of the consultation on the Net Zero Carbon Development Plan Document. However, should clarification or elaboration be required, please let me know.

Yours faithfully

A black rectangular redaction box covering the signature of Elanor Wright.

Elanor Wright