Planning Committee

Title of Paper	**Ebbsfleet Sustainability Assessment and Guidance**
Presented by	Mark Pullin, Director of Planning & Place
Status	For decision
Recommendation	Planning Committee is asked to **Approve** the publication and use of the Ebbsfleet Sustainability Assessment and Guidance.

Purpose of Paper
This paper provides an update on the production of the Ebbsfleet Sustainability Assessment and Guidance. The paper outlines the consultation that has been carried out, the responses received and associated officer comments. The paper seeks approval of the document attached in Annex B.
Annex
Annex A – Summary of consultation responses and officer commentary Annex B – Ebbsfleet Sustainability Assessment and Guidance PDF document

1. Background

1.1. EDC initiated a project in January 2024 to review the options for assessing the sustainable performance of planning applications. This work was timed to coincide with the adoption of Dartford's new Local Plan, which includes new and updated policies around sustainable performance.

1.2. The aims of the project were to:

1.2.1. Provide greater detail on how EDC will assess local plan sustainability policies consistently and accurately for planning applications in Ebbsfleet.

1.2.2. Provide a system to enable more consistent comparison and benchmarking of sustainable performance of planning applications, and ensure adequate recognition for where applicants are investing in performance over and above the minimum regulations.

1.2.3. Demonstrate the alignment / contribution of planning applications towards delivering the ambitions of the Ebbsfleet Sustainability Framework(2021).

1.2.4. Provide basic guidance to facilitate discussion and improve sustainable performance in pre-application meetings.

1.3. Gbolade Design Studio were awarded the commission to review assessment approaches and to identify a preferred approach. Gbolade have carried out similar work at Harlow and Gilston Garden Community and Enfield Council.

1.4. An initial workshop was held with Ebbsfleet's Planning Committee in March 2024, and a follow up session in April. A revised final draft was issued to the Chair of the Planning Committee in July for agreement to consult.

2. Public Consultation

2.1. The public were consulted via the commonplace platform for a period of 6 weeks during August and September, that concluded on October 4th. The assessment tables and guidance PDF document were translated into dedicated commonplace webpages for each project type / subject area, and specific questions posed for each section. This allowed consultees to either respond on the project type they were interested in or specific subject areas.

2.2. The response rate was very low, although commensurate with previous design guidance documents that have been consulted upon by EDC. However the responses that were submitted were positive about the methodology, the chosen performance criteria, and the presentation format of the assessment tables. The responses did not highlight any concerns.

3. Stakeholder Engagement

3.1. EDC held workshops with key stakeholders, including developers, land owners and housebuilders currently active within Ebbsfleet, and a separate dedicated session for EDC's internal development team. Attendees included development managers from Redrow, Bellway, Vistry, Clarion, and a sustainability consultant on behalf of Henley Camland, who all provided valuable insight into the key issues and considerations from their respective business.

3.2. We also offered a site visit of a recently completed net-zero scheme in Croydon, to collectively review the construction methods and technologies required to achieve net-zero, but there was little interest in this offer from stakeholders, and so it did not go ahead.

3.3. Stakeholders identified the following key concerns (in no specific order);

Alignment with national planning Framework: Keen to ensure the expected performance did not exceed the levels of sustainable performance that are enabled by the NPPF and planning law.

Officer response: EDC is confident we do not breach planning law, and is fully aligned with the intent of the 2023 Written Ministerial Statement. The wording of local plan policy does not define an absolute performance level, and EDC's sustainable performance criteria have been developed from local modelling of sustainable performance within Ebbsfleet that provides a locally sourced evidence base to support these performance levels in alignment with the policies.

Additional workload / cost in demonstrating performance: Keen to ensure this is kept to a minimum, to avoid additional cost for both the applicant and the planning authority in assessing schemes.

Officer response: The new and amended sustainability policies within Dartford's Local Plan will inevitably require additional modelling and documentation for applicants to enable adequate assessment. EDC is seeking to minimise the cost associated in delivering this by adopting approaches generally consistent with the GLA and other local authorities who have already introduced assessments of whole life carbon accounting, green infrastructure accounting, and circular economy planning into their planning assessments, to ensure our approach is familiar and well understood by industry.

Timeframes: Keen to ensure that the introduction of the new assessment system does not impact on either the applicant or the planning authority, to avoid delays in delivery.

Officer response: In adopting approaches already familiar to industry, we have sought to minimise any delays for applicants, and have already enacted training in a range of sustainability areas to enable EDC to assess schemes quickly and effectively. The EDC Environmental Sustainability Manager will support assessments by planning and design officers, and we also plan to use sustainability consultancy were necessary to provide expertise when needed in support of officers, which will all be delivered within the statutory planning timeframes.

Consistency with other planning assessment approaches: EDC should ensure it is aligned with the ambitions of other planning authorities, and not exceed the requirements of other early-adopting planning authorities in this field, such as the GLA.

Officer response: We have conducted a further review of all performance criteria and are comfortable that where we use the same metric, our performance levels are generally aligned with those of the GLA, and the

RIBA 2030 Sustainable Outcomes. We have updated the whole life and embodied carbon for residential, to take account of the very latest information from industry and the newly launch Net Zero Carbon Building Standard (launched September 2024), and separated apartment performance from other house type performance to acknowledge the different challenges in the construction and performance of different housing types, and to respond to this issue which was flagged by Henley Camland's representative.

Feasibility: The performance levels stated for the medium and higher performance levels are ambitious at this time, particularly given the emerging nature of calculating whole life carbon emissions, and the levels of inconsistency and inaccuracy in current methodologies.

Officer response: Our performance criteria and metrics are benchmarked against current industry guidance and GLA criteria, and our own testing of recent planning applications in Ebbsfleet demonstrates the middle and upper performance level is already being achieved across a large number of criteria. We will continue to monitor performance of projects annually, to question feasibility, and alignment with broader industry performance, and ensure our guidance and assessment systems remain relevant and fit for purpose.

3.4. A detailed summary of all the feedback provided by both the public and stakeholder engagement is in Annex A. This table also outlines changes made to address the issues that were raised, and EDC's position where concerns are not supported.

4. Relationship with the new 'Net-Zero Carbon Building Standard'

4.1. In September 2024 a new standard was launched by a cross-industry partnership including the UK Green Building Council, RIBA, RICS, CIBSE, Institute of Structural Engineers, BRE, LETI and the Carbon Trust. The 'Net Zero Carbon Building Standard' is intended to fill the hole left by the withdrawal of the Code for Sustainable Homes in 2015, and establish a national standard for buildings that are modelled to be net-zero carbon.

EDC has been tracking the development of this tool, with the intention of ensuring we remain aligned with current industry best practice. At this stage we have reviewed and aligned key metrics and performance levels with the emerging standard, and to respond to feedback from the stakeholder session. We will continue to monitor the uptake / feedback from industry over the next 12 months, and if the new standard does become widely established, we could replace the energy section of the EDC assessment tool with an assessment of alignment with the new standard. However the new tool only assesses energy and carbon, and not the other 4 sustainability areas that the EDC assessment tool assesses. There is some overlap

between some of the EDC criteria for water and waste in reducing carbon emissions, but these criteria also support other key sustainability outcomes, and should continue to be assessed independently of the new standard.

5. Next Steps

5.1. Upon approval, the document will be published on the Design for Ebbsfleet website. A proposed update to the EDC Validation Requirements is included in a separate paper on this agenda.

5.2. Officers will advocate for the application of the guidance in all projects during pre-application meetings.

5.3. Schemes will be assessed by officers at the application stage using the additional documentation requested within the Validation Requirements document, to verify the level of performance 'ticked' on the Sustainability Assessment Summary Table.

5.4. The Sustainability Assessment Summary Table will be presented to Committee as part of the committee report, which will also include more detailed analysis where a scheme has only achieved a lower performance level. It will also be included in relevant reports for delegated decisions.

5.5. We propose to review the performance of this sustainability assessment tool and the associated guidance on a two yearly basis, to ensure it remains relevant and fit for purpose. This field is fast moving and rapidly changing, and it is anticipated that guidance and performance criteria may need to be updated regularly to remain relevant. This assessment will be informed by a review of the performance of projects coming through the planning system in Ebbsfleet, engaging with planning teams in adjacent authorities, and reviewing guidance, standards, metrics and post-completion performance data of projects from across industry. EDC will engage with stakeholders on any proposed changes to performance criteria, and present the final changes to Planning Committee for endorsement.

6. Recommendation

6.1. **For Decision:** It is recommended that the Ebbsfleet Planning Committee APPROVES the publication and use of the Ebbsfleet Sustainability Assessment and Guidance.

Annex A

Summary of public and stakeholder feedback and changes made.

	Concern raised	Comment	EDC Response
1	**Planning Policy** (Bellway & Vistry)	The document goes beyond the requirements of adopted policy of KCC, Dartford Borough Council and Gravesham Borough Council. EDC's ESDG should only accord with adopted policy which has been through viability testing and been through rigorous public examination.	The assessment tables and guidance have been developed to support assessment against local plan policies, including Dartford's recently adopted Local Plan (2024). We have undertaken analysis of sustainability policies within the local plans of Dartford and Gravesham and Kents Minerals and waste Plan, and identified any defined performance levels within the policies, and are thus confident that the assessment criteria and guidance do not go beyond the ambitions / performance levels set out in the policies.
2	**Building Regulations** (Bellway & Vistry)	Ministerial Statement from Baroness Penn, dated 13 Dec 2023, stipulated that the government does not expect plan makers to set local energy efficiency standards that go beyond current/planned building regulations. any policies by local authorities going beyond building regulations can add further costs to building new homes. The Dartford Borough Council's Local Plan proposed Policy M3: Sustainable Technology, Construction and Performance initially sought to achieve minimum reductions in regulated carbon emissions beyond	EDC's approach has been developed in alignment with the TCPAs' position, and in alignment with the position outlined by Estele Dehon KC (Cornerstone Barristers), which can be read in a guest article on the TCPA's website. Firstly, the Written Ministerial Statement (WMS 2023) purports to "how to create policies that go beyond current or planned Building Regulations which would in the Government's view meet the reasonable requirement included in section 1 of the 2008 Act." Secondly, the clarification establishes that the WMS does not "prevent local authorities from

		Building Regulations. This had to be modified at examination, as directed by the Inspector having regard to the WMS. The starting point for carbon targets from new developments in Ebbsfleet is therefore Policy M3 of the Dartford Local Plan, which requires developments to align carbon reductions with the latest Part L Building Regulations. A review of the draft Ebbsfleet Sustainability Assessment that EDC is consulting on appears to set expectations from developers that go beyond the requirements of adopted policy, and so overstep the remit of such guidance and expectations for planning applications. The starting point of EDC's ESDG should that it be clear on the appropriate sustainability measures as required by adopted policy, which has been through viability testing and been through rigorous public examination. This therefore needs revising to be brought in line with adopted Development Plan Policy.	exercising their power to prescribe policies which go beyond the Building Regulations under section 1 of the" Planning and Energy Act 2008 (the 2008 Act) and that, "in the context of decision making, the 2023 WMS is a material consideration and does not purport to be any more than that." The clarification stipulates that the use of SAP to calculate the 'Target Emissions Rate' is only one way in which a policy can be considered reasonable, and other metrics and methodologies (such as the proposed Energy Use Intensity metric) may pass examination if they are supported by an evidence base that justifies their viability. Policy M3 does not seek alignment with Part L, but actually sets current building regulations as an absolute minimum (M3-7), and that larger development should go beyond this ; *M3 -7 : Development must achieve, as a minimum, the reduction in regulated carbon emissions as set out in current Building Regulations, unless it can be demonstrated that such provision is not feasible. Large residential development of 100 dwellings or more should also demonstrate additional significant zero and/ or low carbon or sustainable technology features across the site.* Furthermore policy M3-6 states "*All residential development should incorporate passive design in order to optimise solar and daylight access and reduce the 3risk of overheating and the need for cooling"*

			The 'Heating Load' and 'Energy Use Intensity' metrics are identified by industry as the preferred methodology for measuring the passive design of a project, and as such have been incorporated by EDC to allow assessment against policy M3-6.
3	**Assessment tables** (Bellway & Vistry)	The arrangement of the assessment tables implicates that policy aligned proposals may only be ranked as orange which is the lowest category performance measure in the table. There is concern that this will cause difficulties in securing support for developments from a sustainability perspective, even when aligned with the adopted Development Plan policy requirements. Therefore, if the assessment tables are used in the manner currently proposed, Vistry Group consider it essential it is only for assessing planning gain above adopted policy requirements and should not be used negatively score a proposal that meets adopted policy. If a development aligns with policy, it should be ranked 'green' with different rankings recognised as distinct planning benefits where it is exceeded.	Policy analysis has identified that most sustainability policies within the local plan do not define a minimum or maximum performance level. These policies generally use wording such as 'optimise' or 'maximise', to provide flexibility for applicants to take account of project specific constraints and avoid setting an absolute target that fails to take account of the challenges and fast-moving nature of sustainable performance. The colours are used to denote three levels of performance; • The amber level denotes a minimum level of performance that may be policy compliant, dependent on the assessment of the severity of a project's specific constraints (e.g. site's layout, orientation, access, and characteristics such as building size, use etc) • The light green defines an intermediate level of performance, between the minimum and the fully compliant performance level. EDC have sought to identify and map industry recognised intermediate performance levels for this category, to ensure consistency with broader

			industry practice. It signals 'the next step on the ladder' in regards to performance. • The dark green denotes a level of performance that would deliver against the sustainability outcome defined in the policy, and cross-referenced against EDC' sustainability framework outcomes. EDC's own carbon modelling, and the work within the wider industry by leading organisations such has RIBA, RICS and LETI has identified performance levels in a range of key sustainability criteria which will deliver against the design outcome stated in the local plan policies. Not all criteria have three defined levels of performance, to reflect the industry understanding and practice. User testing has shown that there is a benefit to applicants in using colour coded tables to visually communicate performance, as it helps to highlight to planners and the planning committee where applicants have used high quality design to solve challenges and constraints and to contribute more significantly towards the policy outcomes of the local plan, and the Ebbsfleet Sustainability Framework.
4	**Additional time/ cost / workload** (Bellway and Vistry)	Vistry Group also note that there is a time / cost issue with the work required into complete the extensive assessment criteria forms. This will add additional time and cost to preparing	EDC recognise that there is a small number of additional documents required to demonstrate compliance against the new sustainability policies within Dartford's Local Plan.

		planning application submissions and add additional workload onto officers reviewing applications. It could be counter productive in securing viable, deliverable new homes in a timely manner that meet the necessary sustainability standards. It is requested that this be reviewed. Bellway is very concerned about the onerous work required in completing the ESDG assessment table and criteria forms. This will add additional time to preparing planning application submissions and add additional workload onto officers reviewing applications. This is therefore considered to be a hindrance to the delivery of much needed new homes in the Garden City.	To minimise the potential additional workload for applicants, EDC has sought to use identical documents and methodologies to those already used across the GLA area, and which will therefore be familiar to applicants already working in London and a number of local authorities on the London boundary. This ensures a consistent and recognised approach in industry that ensure the most cost effective way of demonstrating compliance with the new local plan policies, and in doing so also demonstrate delivery against the sustainability ambitions for Ebbsfleet Garden City.
5	**Energy Use intensity** (Bellway & Vistry & Twin Earth)	Vistry Group consider that Energy Use Intensity regarding unregulated carbon is a factor that is outside the control of Vistry Group and an assessment criteria that planning applications should not be assessed on; this is outside Vistry Group's control. Unregulated carbon will depend on the end use of each individual property by its occupants, and covers the energy usage of household appliances. Vistry Group is prioritising reducing heat loss to dwellings and using low carbon heating solutions such as electric heating and	**Why is EDC using the EUI metric?** The EUI is a metric that has become broadly supported and used across industry in recent years to measure energy efficiency and provide a simple metric that can be consistently applied and allow benchmarking of performance between projects. It is recognised that the EUI includes unregulated energy usage, however this has already been factored into the defined EUI performance levels derived from the work of LETI, RIBA etc. The GLA, RIBA, RICS, LETI, and the new Net Zero Carbon building standard all use the EUI metric, which is fast becoming the

		air source heat pumps. Additionally, there is not currently a common construction metric for measuring energy use intensity. This would require agreeing an assessment methodology ahead of preparing additional assessments for each scheme, based on use factors that are outside the control of Vistry Group. Vistry Group consider that Energy Use Intensity assessments should not be required of applicants for planning permission. Can we use the part L model to calculate the energy use intensity? In London when you calculate the energy use intensity you have to complete an additional piece of modelling to obtain that number. Can we use TM54 calculations for planning? It's a lot more challenging for residential buildings as you cant use the same software, other calculations are required. These things will have cost implications to provide the evidence to provide the submission. (TWIN EARTHS COMMENT)	standardised industry metric for assessing energy efficiency. Key advantages of the EUI metric: 1. **Simplicity and Clarity**: EUI is a straightforward metric that measures energy consumption per unit area, making it easier to understand and communicate[1]. Targeted emissions reductions can be more complex, involving various factors like energy sources and emissions factors. 2. **Benchmarking and Comparisons**: EUI allows for direct comparisons between buildings of different sizes and types, facilitating benchmarking and performance tracking[2]. This is less straightforward with emissions reductions, which can vary widely based on energy sources and other variables. 3. **Operational Focus**: EUI focuses on the operational efficiency of a building, encouraging improvements in energy management and usage patterns[3]. Emissions reductions often require changes in energy sources, which might not directly address operational inefficiencies. 4. **Regulatory Compliance**: EUI is increasingly being used across industry in guidance and standards, making it a familiar and accepted metric for compliance[3]. Emissions reductions targets can be more challenging to standardize and enforce due to their complexity.

			5. **Cost-Effectiveness**: By focusing on energy use, EUI can help identify cost-saving opportunities through energy efficiency measures[3]. Emissions reductions might require more significant investments in renewable energy or carbon offsetting. **How should the EUI be calculated ?** The GLA have established a defined methodology for calculating the EUI, which EDC intend to adopt to ensure consistency within the industry. EDC will continue to monitor the use of metrics by the GLA and across wider industry, and update our own approaches as necessary to ensure we remain aligned with best practice. The calculation for each dwelling is straightforward in that it assesses the amount of total energy needed to run a building over a year (per square metre) = Total Annual Energy Consumption (kWh) / Gross Floor Area (m²) = kWh/m²/year The total energy consumption will include: ● **Electricity**: From the grid, solar, or other sources. ● **Fuel consumption**: Gas, oil, coal, or biomass. ● **District heating or cooling**: If the building/dwelling is connected to a central system.

6	**Internal daylight assessment** (Bellway)	An internal daylight assessment for low scale residential development, including low rise flats and homes, is excessive and is not even a requirement for applications covered by the London Plan. This adds a further expense to preparing a planning application and a further document for officers to review. Bellway view that an internal daylight and sunlight assessment for housing schemes is an excessive requirement and requests that such requirement is removed.	EDC already require internal daylight assessment for key house typologies and believe this is critical to ensuring our homes receive adequate daylight to support the health and happiness of our residents.
7	**Overlap with STS and BFHL** (Bellway & Vistry)	It is considered that many of the proposed requirements overlap with those already stipulated by the Sustainable Travel Strategy and within the BFHL. Bellway therefore asks what will happen to the STS and BFHL assessments where there is a doubling up of assessments.	EDC has reviewed all current assessment criteria and can confirm there are no conflicts between the current assessment criteria and those being introduced in the sustainability assessment tables. Where a design performance area is being assessed within two different assessment tools, this is to allow an assessment of that design area's contribution towards two separate design outcomes.
8	**Assessment process & expertise** (Bellway, Vistry & Twin Earth)	Vistry : The Guidance requires the submission of technical reports and details, which will require a thorough review by EDC. It is therefore essential that EDC have sufficient technical expertise and resource to swiftly review and assess forthcoming submissions. Otherwise the processing of applications and ultimately housing delivery will be delayed. Vistry Group also question who will review the additional documents, and ask if this is an additional	EDC is committed to supporting applicants through the pre-app process and at application stage through providing supporting technical expertise across design and sustainability. Where necessary EDC will supplement existing internal resource with expert consultancy support, to ensure we are able to assess sustainability effectively and efficiently and advise on improved performance throughout the project planning and design process.

		cost to be paid by the developer. Twin and Earth : Often design review panels lack the day-to-day level expertise. It can be demoralising when we present complex thoroughly thought through levels only to be advised on the basics. Will your team have the expertise to review this data. Bellway has queries over who will review the additional documents, and ask if the additional review would be an extra cost to be paid by applicants. Additionally, Bellway has concerns that the additional documents create potential for external specialist consultants to extend the programme in which applications are determined, again increasing costs and delaying delivery.	EDC's Design Forum which is hosted by Frame includes dedicated sustainability experts from a range of leading sustainability consultancies and architectural practices, and we are also able to supplement this expertise with access to Frame's wider design panel membership.
9	**Feasibility of delivering some natural environment criteria within the project site** (Vistry)	Vistry Group note reference to drought resistance and food growing. Again these issues must be considered with flexibility in mind. There are set constraints and development parameters established by the AMP for Ashmere which mean that not all phases can include additional areas of landscaping whilst securing sufficient housing delivery.	Firstly, EDC have reviewed the natural environment criteria to take account of the scale of projects, and the ability to meet the criteria within a project site, or whether the criteria are better considered within a 5 minute walk of the project site area. Secondly, it is also recognised that some schemes already have outline planning permission in place, that include certain constraints that may prevent future schemes from delivering certain levels of performance. The one page 'Sustainability Assessment Summary Table' will be presented to planning committee as an annex to the

			Planning Officer's Committee Report, which will include the detailed analysis of feasibility of meeting the criteria.
10	**Impact delivery speed** (Bellway)	Bellway is concerned that providing additional documents to validate planning applications will slow down the approval and delivery of proposals. Bellway's experience on applications within EDC is that multiple revisions to schemes, requiring multiple updates to reports and documents are often necessary. If additional documents are required, each time there is a revision these documents will have to be updated, adding delay and expense. Therefore, Bellway question the rate at which homes can be delivered in the Garden City if the ESDG is implemented, particularly as EDC is visioned to be a housing delivering authority.	It is recognised that different sustainability documents can and should be developed at different points in the design process. It is understood that strategic design performance areas can be tested and agreed at earlier stages in the pre-app process, while more technical and detailed calculations around building performance etc is likely to only be able to be undertaken once key strategic decisions have been made. EDC recognise that the full set of documents is only likely to be available at the application stage.

11	**(Upfront carbon** (Twin Earth)	Embodied carbon needs more testing as its quickly evolving and as an industry we have limited accurate data. The accuracy of measuring embodied carbon is developing, so imposing a level at planning stage will not be achievable. Have you tested the upfront carbon? 850 is the maximum we have achieved. 500 is best case scenario which is not achievable in a tower block. The EDC dark green level is more than the GLA number and is deemed unachievable. The categories that you're not able to access data for are the areas that are most difficult to deliver.	We agree it is an emerging field and fast moving. We expect consultant teams to demonstrate best how they are achieving the targets stipulated with current industry guidance at the time. Leading consultants are becoming more familiar with EC calculations and this is no longer considered an unusual requirement. The performance criteria are aligned with RIBA, LETI, RICS and the GLA performance criteria. However the recently published Net Zero Carbon Building Standard, which is a cross-industry developed initiative, has published different performance criteria for apartments and houses for the first time, to recognise these differences in potential performance derived from the scale of the built form.

12	**Upfront Carbon for resi** (Twin Earth)	The benchmark for EC in residential development massively differs between typologies. It is much harder for a block of flats to achieve the same standards as houses, there is currently no consideration of typology within categories.	The Net Zero Carbon Building Standard (NZCBS) that was recently published shows targets at: - Flats 565 (2025) - 380 (2030) kgCO2e/m2 GIA (LETI - 500) - Houses 430 (2025) - 290 (2030) kgCO2e/m2 GIA (LETI - 500) - Year dates are for commencement on site The figures put forward by NZCBS evidence the targets requested by EDC are reasonable and in alignment with industry expectations EDC have therefore updated the residential criteria to recognise this, introducing separate whole life carbon and embodied carbon performance criteria for 1) apartments, and 2) houses.
13	**Overheating** (Twin Earth)	The overheating targets are beyond ambitious and not practical. The criteria is very complex to achieve and model, you will have to have people with high technical expertise to review the application especially for the grey areas	Overheating analysis should be used as both a design tool and a reporting tool. It is considered industry standard for the overheating risk to homes and buildings to be reduced through good design and carry out Part O and CIBSE TM59/TM52 dynamic thermal modelling. • CIBSE TM59 overheating analysis should be used iteratively to test and confirm whether window sizes, openings and

			shading in homes are having the desired effect on reducing overheating. Designs should be altered accordingly. • CIBSE TM59/TM52 overheating analysis for homes, corridors and non-domestic spaces should be reported as part of detailed planning submissions and reconfirmed pre-commencement. • Part O dynamic simulation analysis should be carried out in line with regulations and reported pre-planning. Developers are also directed to using the Good Homes Alliance Overheating Tool + Checklist at RIBA Stage 2 - https://goodhomes.org.uk/wp-content/uploads/2019/07/GHA-Overheating-in-New-Homes-Tool-and-Guidance.pdf The higher value Overheating targets stipulated in the EDC Sustainable Assessment Guide align with use of 2050 weather files to reflect the long term ambitions of EDC to deliver robust homes and buildings that reduce the need for frequent retrofitting into the future. Some of the recent schemes in Ebbsfleet have used the 2050 weather data sets, and we are therefore confident that these targets are practical and feasible.