

From: [REDACTED]
Sent: 13 September 2021 20:30
To: Planning Policy
Subject: DPD - Consultation - Comments

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Dear Sir/Madam

The Good Homes Alliance represent 80 organisations from the built environment sector including 22 Local Authorities and 7 Housing Associations, we are striving to help achieve true net zero ambitions within the sector.

We welcome your DPD and it has much to be commended, we do however wish to comment on some aspects that we think are embodied in our comments below:

- SAP does not demonstrate energy efficiency in operation
- The Future Homes Standard does not set out performance metrics for performance in use
- Nationally recognised standards for performance in use are mainly associated with the Passivhaus system, NEF's Assured Performance Process.
- The most up to date SAP does not deal with the 'performance gap'.
- The term Net Zero Carbon should be defined as either "in use" or "whole life net zero" to include in use and the whole carbon in materials cycle

Best regards

Julian Brooks



Julian Brooks | Programmes Director

