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Date: **18.11.2022**

Rugby Borough Council,
Town Hall
Evreux Way
Rugby CV21 2RR

Dear Sir / Madam,

RE: Climate Change and Sustainable Construction Supplementary Planning Document Consultation

Thank you for your letter inviting Hinckley & Bosworth Borough Council (HBBC) to comment on the above document. HBBC supports the Climate Change and Sustainable Construction SPD. However, we would also like to provide comments which we hope that you find useful.

Introduction

The second and seventh bullet point in the Introduction section under paragraph 1.2 addresses mitigation of climate change, however these are not relevant for the content of SPD as the SPD does not offer any guidance on mitigating carbon emissions or air pollution produced by vehicles, nor does it explain how it will use adaptation to make adjustments in ecological, social or economic systems.

Paragraph 1.5 explains the weight of the SPD in determining planning applications, however, the explanation is complicated and could be simplified,

The reference of the Air Quality SPD doesn't seem to be relevant in paragraph 1.8 as it is already mentioned that other adopted SPDs need to be used in conjunction with the Climate Change SPD and local plan policies.

Paragraph 1.9, the use of 'need to' instead of 'should' in reference to the applicant using this SPD is a better choice of words given the SPD's weight in determining planning applications. The second sentence needs to be proofread as it contains an extra 'to' after only and the sentence's end is missing.

Energy Efficiency

The energy hierarchy, based on the National Design Guide 2019, seems like a logical approach for developments to achieve carbon reduction targets. It would be beneficial to briefly introduce each section of the Energy Hierarchy before the document gets into each tier. Additionally, Figure 1: The Energy Hierarchy, could be cleaned up a bit as the text isn't centred in the triangle and the white within the text is distracting and needs to be turned into the same colour as the background. This is important for screen-reader's capability to read the diagram and for accessibility reasons.

BREEAM and Non-Residential Building Design

This section is very useful in explaining what requirements need to be met. However, the likely exceptions have only been identified for buildings in conservation areas, whereas we think it would be beneficial to set out the other exceptions where BREEAM is not required such as buildings that do not require heating etc. This would help to provide further clarity as to the application of the BREEAM standard

Additionally, this section explain that the council will require an equivalent standard where the BREEAM certification process hasn't been used. It would be useful if the acceptable alternatives can be listed, such as the LEED (Leadership in Energy and Environmental Design) and others.

Green Infrastructure, Landscaping and Biodiversity

The title of this section should be reconsidered as biodiversity is not discussed in as much detail as Green Infrastructure and landscaping. Biodiversity is only briefly mentioned in paragraph 6.10, which doesn't justify its use in the title of the section.

The presentation of the document

The document's presentation needs a review. In multiple sections the font style and size does not match and looks like it was cut off. The use of diagrams is supported, however there is a large difference in the quality and the consistency of the diagrams (for example some sections in Energy Efficiency have diagrams and others do not which makes the approach to using diagrams inconsistent). Additionally, we recommend that the document's accessibility is reviewed to make sure that screen-readers can read the document.

To sum up, HBBC supports the adoption of the Climate Change and Sustainable Construction SPD and hope that the comments made will be considered in improving the SPD's content and presentation.

Kind regards,

Yoanna Gardner

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Hinckley and Bosworth Borough Council