

# Hydrock comments

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As a sustainability consultant within an M&E practice I find the lack of ambition in the carbon reduction targets for developments quite disappointing. The 35% on-site carbon reduction requirement has been the same for a number of years now, when this was first introduced it was a 40% improvement over Part L 2010, which was seen as progressive and pushing the boundaries of design. This is now common place and relatively easy to achieve, I have not worked on a project where achieving this has been that difficult.

The introduction of a 10-15% reduction in carbon through passive design and energy efficiency alone seems like a pointless addition. Most residential developments can meet that with good fabric without too much stress. This is easier to achieve in commercial developments where gains in equipment efficiency are bigger.

With the Mayor's ambition for London to be "a zero carbon city" I would have expected a push on this and an improvement in the 35% on site target. The carbon offset payment even if increased to £95/tonneCO<sub>2</sub>/30 years would still be far cheaper than providing the same carbon offset in on-site technologies.

With the Paris Accord signed we need to be at zero carbon new buildings by 2030 and zero carbon all buildings 2050, it would have been a more responsible design to see the Mayor pushing to achieve this. Developers are gaining a lot from the new London Plan, they should be held accountable in other areas.