

72184

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Graham Ball [12986]**Summary:**

The district's ultimate aim is to achieve net zero. The document is clear that for operational building emissions, a net zero target is the principal that developers should achieve, which is great. However, the document does not require developers to achieve net zero for the emissions of constructing developments, but the document also states that up to 50% of lifetime building emissions can come from the construction phase. Therefore, the policy will fail to deliver net zero.

There is no valid excuse for the policy to be so weak. Net zero for new buildings could be achieved far quicker, easier and cheaper by banning all new housing developments in the district. That would be a short term solution. In the long run, the biggest source of emissions is population growth.

Full text:

The district's ultimate aim is to achieve net zero. The document is clear that for operational building emissions, a net zero target is the principal that developers should achieve, which is great. However, the document does not require developers to achieve net zero for the emissions of constructing developments, but the document also states that up to 50% of lifetime building emissions can come from the construction phase. Therefore, the policy will fail to deliver net zero.

There is no valid excuse for the policy to be so weak. Net zero for new buildings could be achieved far quicker, easier and cheaper by banning all new housing developments in the district. That would be a short term solution. In the long run, the biggest source of emissions is population growth.

Legally Not specified**compliant:****Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8nr>

72188

Object

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Steven Barnett [15608]**Summary:**

Stop the carbon fraud.

Full text:

Stop the carbon fraud.

Legally Not specified**compliant:****Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8ns>

72204

Comment

Policy NZC1: Achieving Net Zero Carbon Development**Respondent:** Barratt David Wilson Homes Mercia [15663]**Agent:** Savills (Mr Michael Burrow) [6607]**Summary:**

Please see attached.

Full text:

Please see attached.

Legally Not specified**compliant:****Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8n5>

72165

Object

1.2 About Warwick District**Respondent:** BLAST (Bringing Leamington Allotment Societies Together) (Ms Juliet Carter) [4840]**Summary:**

There is an unacceptable amount of building on Green Belt when Brownfield land is available.

The council does not seem to be capable or interested in stopping developers from committing Wildlife Crimes in their building projects.

There is no information given about other practical lifestyle and policy measures that could be taken by WDC staff to reduce carbon emissions.

Full text:

1.2.5 Building on Green Belt exacerbates carbon problems by removing vegetation which absorbs carbon. Mature trees (and less mature, which will now never reach maturity) are cut down for building developments regularly. In Kenilworth just after the A46 roundabout there is a stretch of about 50 meters of mature trees that have recently been obliterated for a new development on Green fields. This was done in nesting season, which is a Wildlife Crime which has no negative impact on those who commit it. These carbon costs, and removal of the means to decrease carbon (vegetation) are not being reflected in your assessment (1.2.7). Further 1.2.7 does not give any information about the remaining 60% of carbon that is not related to buildings. How are we to address these problems if there is not clarity about what the problems are? 1.3.1 states what this DPD is concerning, which is a very small element of the issue stated in the target of net zero.

Legally compliant: No

Sound: No

Appear exam: Written Representation

Attachments: None

72166

Object

4.2 Objectives, 4.2 Objectives**Respondent:** BLAST (Bringing Leamington Allotment Societies Together) (Ms Juliet Carter) [4840]**Summary:**

What consultations have been done with environmental bodies to create these aims and objectives? What training of staff has been done to educate them on the seriousness of this issue? There is much professional guidance and skill needed to move to a zero carbon world which are not currently being used.

The wording of the objectives is weak and allows a loophole for developers to avoid making the necessary net zero changes.

Funds raised to run a carbon offsetting program will inevitably be spent on salaries and administration and incur more carbon costs in installations.

Full text:

What consultations have been done with environmental bodies to create these aims and objectives? What training of staff has been done to educate them on the seriousness of this issue? There is much professional guidance and skill needed to move to a zero carbon world which are not currently being used.

4.2.3 The word 'consideration' (of low carbon energy sources) is not obliging developers to include them. It should read "To oblige the installation of low carbon energy sources as part of development proposals."

We all know that the developers' priority is profit, and so they will not include low carbon energy sources unless they are MADE to. This is a weak loophole that developers will take advantage of. It will result in failure for new buildings to make any significant progress toward net zero. Necessary retrofitting is inevitable.

4.2.4 The last resort objective will inevitably result in significant administration, salary and carbon costs which could be avoided if 4.2.3 was implemented in a meaningful way.

Legally compliant: No

Sound: No

Appear exam: Appearance at the examination

Oral exam why: I am not convinced that the Council is making the most sensible decisions, or that they are acting on advice from environmental bodies.

Attachments: None

72167

Object

Policy NZC1: Achieving Net Zero Carbon Development**Respondent:** BLAST (Bringing Leamington Allotment Societies Together) (Ms Juliet Carter) [4840]**Summary:**

5.6 1, 2 & 3 Again we are seeing the use of the word "considering" rather than obliging developers to comply with the regulations that are being set in order to get to net zero.

What consultation has been done with environmentally sustainable conscious bodies to advise practical measures to inform council staff and developers? Other carbon issues to consider in developments are vegetation destruction, particularly mature trees which absorb carbon, biodiversity loss (often avoidably), cycle routes should be completed before the houses are constructed.

Full text:

5.6 1, 2 & 3 Again we are seeing the use of the word "considering" rather than obliging developers to comply with the regulations that are being set in order to get to net zero.

What consultation has been done with environmentally sustainable conscious bodies to advise practical measures to inform council staff and developers? There are other carbon issues to consider when developments are under way such as vegetation destruction, particularly mature trees which absorb carbon, the biodiversity loss (often avoidably), the cycle routes which should be completed before the houses are constructed rather than later, such as the situation with the estate on Europa Way where residents cannot even walk safely into town, but must drive.

Legally No**compliant:****Sound:** No**Appear exam:** Appearance at the examination

Oral exam why: There are large omissions in the plan which should be introduced. The statements of intent are weak and developers will only make a minimal attempt to reach carbon neutral with this plan as it is.

Attachments: None

72168

Comment

6 Reducing Energy Demands: Energy Efficient Buildings**Respondent:** BLAST (Bringing Leamington Allotment Societies Together) (Ms Juliet Carter) [4840]**Summary:**

The regulations to lower carbon emissions should be extended to retrofitting, not just new buildings.

Full text:

The regulations to lower carbon emissions should be extended to retrofitting, not just new buildings.

Legally Not specified**compliant:****Sound:** Not specified**Appear exam:** Not specified**Attachments:** None

72169

Comment

7 Energy sources**Respondent:** BLAST (Bringing Leamington Allotment Societies Together) (Ms Juliet Carter) [4840]**Summary:**

What independent environmental sustainability bodies are monitoring the efficacy of proposals? I am concerned that the council does not have a realistic approach or the skills necessary to assess and implement the changes necessary. We are all stakeholders and transparency is crucial.

Full text:

What independent environmental sustainability bodies are monitoring the efficacy of proposals? I am concerned that the council does not have a realistic approach or the skills necessary to assess and implement the changes necessary. We are all stakeholders and transparency is crucial.

Legally Not specified**compliant:****Sound:** Not specified**Appear exam:** Not specified**Attachments:** None

72171

Comment

9 Embodied Carbon**Respondent:** BLAST (Bringing Leamington Allotment Societies Together) (Ms Juliet Carter) [4840]**Summary:**

Ideally there would be natural resources available such as hemp farms for hempcrete in Warwickshire itself. Would the council support such projects?

Full text:

Ideally there would be natural resources available such as hemp farms for hempcrete in Warwickshire itself. Would the council support such projects?

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72170

Object

8 Carbon Offsetting**Respondent:** BLAST (Bringing Leamington Allotment Societies Together) (Ms Juliet Carter) [4840]**Summary:**

8.1 The offsetting of vegetation planting is not viable if the vegetation does not survive. Profit based organisations fail to maintain and support vegetation as it is cheaper to re-plant, as is the protocol for the massively high carbon / high cost HS2 project. Measures to invalidate the offsetting if it does not survive the climate changes happening now and over the next 3 decades are needed. Droughts, fierce storm damage and flooding are caused by the high carbon infrastructure / built environment in the first place.

8.6 Re-wilding is the most efficient carbon reduction system and climate change reducer.

Full text:

8.1 The offsetting of vegetation planting is not viable if the vegetation does not survive. It is the nature of profit based organisations to fail to maintain and support vegetation as it is cheaper to re-plant, as is the protocol for the massively high carbon / high cost HS2 project. There need to be measures to invalidate the offsetting if it does not survive the climate changes happening now and over the next 3 decades. Droughts, additionally fierce storm damage and flooding are caused by the high carbon infrastructure / built environment in the first place.

8.6 There is an opportunity to introduce re-wilding as the most efficient carbon reduction system and climate change reducer.

Legally compliant: No

Sound: No

Appear exam: Appearance at the examination

Oral exam why: There seems to be little enforcement of the proposed low carbon goals. I am not seeing how the council will achieve net zero unless it involves at all stages the environmental sustainability bodies that have the skills to address the issue.

Attachments: None

72212

Support

4 Aims and Objectives**Respondent:** Cuvette Property Consulting Limited [15625]**Agent:** Oxalis Planning (Elanor Wright) [15624]**Summary:**

Please see attached.

Full text:

Please see attached.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8nd>

72213

Comment

4 Aims and Objectives**Respondent:** Gladman Developments (Rob Wilding, Senior Planner) [15632]**Summary:**

Gladman are supportive of the general principle of improving energy efficiency, however we still feel there are a few policy working tweaks as well as additional information required to ensure that the draft DPD is sound. Whilst the Council progress forward with the draft DPD, it will be important that the provision of additional guidance on this topic is forthcoming and that it aligns with the Government's aspirations, national planning policy and Planning Practice Guidance.

Full text:

Please see attached.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8nw>

72210

Object

Policy NZC1: Achieving Net Zero Carbon Development**Respondent:** Home Builders Federation Ltd (Ms Sue Green, Planning Manager) [7773]**Summary:**

For the Warwick Net Zero Carbon DPD to be found sound under the four tests of soundness as defined by the 2021 NPPF (para 35), the DPD must be positively prepared, justified, effective and consistent with national policy. The HBF consider that Policies NZC1, NZC2(A – C) and NZC3 are unsound.

Full text:

Please see attached.

Legally compliant: Not specified**Sound:** No**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8nb>

72215

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** IM Land [14494]**Agent:** Barton Willmore (Holly Martin, Senior Planner) [15671]**Summary:**

Please see attached.

Full text:

Please see attached.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8ng>

72208

Object

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** IM Land and IM Properties [15667]**Agent:** Turley (Vicky Madden, Senior Planner) [15419]**Summary:**

IM have reviewed the Net Zero DPD and have presented a number of concerns which without amendment, the draft DPD can only be considered unsound.

These concerns are:

- Unsound viability evidence base which does not meet the requirements of Paragraph 31 of the NPPF.
- Further detail is needed with respect to the offsetting fund proposed to ensure that any funds received by the council will be spent on effective and deliverable carbon offset projects; and
- The need to introduce transitional arrangements given that Policy NZC1 is introducing the full FHS two years before the Governments proposed timetable.

Full text:

Please see attached.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8n9>

72205

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Individual (George Martin) [15215]**Summary:**

Please see attached.

Full text:

Please see attached.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8n6>

72207

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Intelligent Alternatives Limited (James Jamieson, Planning and Development Manager) [15666]**Summary:**

■ Please see attached.

Full text:

■ Please see attached.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8n8>

72196

Support

4 Aims and Objectives**Respondent:** Mr Rodney King [4939]**Summary:**

■ We strongly support what is set out in the Net Zero DPD proposal.

Full text:

■ We strongly support what is set out in the Net Zero DPD proposal.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8n3>

72206

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Emma Longworth [15664]**Summary:**

■ WCC's policy to promote and support the transition to electric/hybrid vehicles in the County concentrates on the provision of public-access infrastructure. However, the Electric Vehicle Charging Infrastructure Strategy (ECVIS) also commits WCC, in coordination with other authorities and organisations, to "raise awareness of ... the options for and benefits of EV ownership." I would argue that this means that WCC and its partners will take reasonable action to ensure that individual policies work together to remove barriers to the use of EVs. This means that fresh approaches must be taken so that private provision of charging points is not hindered by the policies of local government. This change in attitude will be necessary, for example, so that people living in terraced housing in streets where parking is at a premium can do their bit to clean up the atmosphere in their towns.

Full text:

■ Please see attached.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8n7>

72217

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Persimmon Homes [15533]**Agent:** Barton Willmore (Holly Martin, Senior Planner) [15671]**Summary:**

Please see attached.

Full text:

Please see attached.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8nx>

72192

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Mr Andrew Pike [15600]**Summary:**

There are various references in the draft Plan to compliance with it being subject to that being 'feasible' in the light of the type of development and its design, and also to where it must be 'viable' for a design to comply. Surely, these 'loopholes' would give an opportunity for developers to get around full compliance? I suggest that developers should create designs that comply with the Plan, and if they do not their designs should be rejected, rather than them creating designs which do not comply, and then seeking to take advantage of the loose wording about feasibility or viability in the Plan.

While the draft Plan seems mainly about buildings, traffic issues are also of major concern in urban areas such as Warwick and Leamington. I believe that there should be much wider use of traffic 'calming' measures (eg. speed bumps, chicanes etc) on urban roads (such as exist on Clemens Street in Leamington) in order to reduce speeds, and therefore carbon emissions, as well as improving safety generally. It also seems a nonsense that cars and diesel powered buses are still allowed to pass down the Parade in Leamington, through the heart of a pedestrian shopping area. I appreciate that, if the Parade was pedestrianised, traffic would still have to use other roads around the edges of the town, but that would at least avoid the concentrated pedestrian area around the Parade.

Full text:

There are various references in the draft Plan to compliance with it being subject to that being 'feasible' in the light of the type of development and its design, and also to where it must be 'viable' for a design to comply. Surely, these 'loopholes' would give an opportunity for developers to get around full compliance? I suggest that developers should create designs that comply with the Plan, and if they do not their designs should be rejected, rather than them creating designs which do not comply, and then seeking to take advantage of the loose wording about feasibility or viability in the Plan.

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Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8nt>

72177

Comment

1 The Local Context

Respondent: Mr Colin Quinney [15655]

Summary:

Set specific and more ambitious emission standards

Specify BREEAM where appropriate (and another standard or standards where not) and and by category at maximum energy credits.

WDC to be explicit in leading by example

Full text:

1.1.2 Set specific and ambitious maximum carbon emission standards. Can we adopt specific carbon emission targets in kwhr/m2/yr (not just percentages) as is widely recommended? And make the energy efficiency first principle first and more strongly - the cheapest energy is the energy we do not use.

Where in the document do we specify BREEAM for all developments, domestic and non-domestic now that CC3 is being superseded? Or does BREEAM apply only to non-residential buildings - in which case what standard for residential is being specified?

Each BREEAM standard needs to be specifically set by category and date and at maximum energy credits NOT very good to eliminate any non carbon emission/energy loopholes being exploited.

1.1.3 WDC as building and landowner should already be leading more strongly by example, by applying the proposed DPD standards - or better - in all projects since the CEAP was adopted, not waiting for formal DPD adoption; for example in Kenilworth Leisure, Spencer Yard and any others from WDC or partners in the pipeline.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72179

Comment

1.1 Warwick District Council's Climate Change Commitments

Respondent: Mr Colin Quinney [15655]

Summary:

More specific and ambitious energy targets

Clarify and maximise use of BREEAM standards where applicable and other measure(s) where not eg perhaps housing

WDC to lead by example

Full text:

1.1.2 Set specific and ambitious maximum carbon emission standards. Can we adopt specific carbon emission targets in kwhr/m2/yr (not just percentages) as is widely recommended? And make the energy efficiency first principle first and more strongly - the cheapest energy is the energy we do not use.

Where in the document do we specify BREEAM for all developments, domestic and non-domestic now that CC3 is being superseded? Or does BREEAM apply only to non-residential buildings - in which case what standard for residential is being specified?

Each BREEAM standard needs to be specifically set by category and date and at maximum energy credits NOT very good to eliminate any non carbon emission/energy loopholes being exploited.

1.1.3 WDC as building and landowner should already be leading more strongly by example, by applying the proposed DPD standards - or better - in all projects since the CEAP was adopted, not waiting for formal DPD adoption; for example in Kenilworth Leisure, Spencer Yard and any others from WDC or partners in the pipeline.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72178

Comment

1.2 About Warwick District**Respondent:** Mr Colin Quinney [15655]**Summary:**

The role of the District in generating inward and outward flows of commuter traffic (principally to/from Coventry and Birmingham) should be highlighted. To minimise carbon emissions from current and future traffic flows the DPD should explicitly favour new development with minimum dwelling densities (NPPF paras 124/5) especially along public transport routes; and co-located as far as practical with planned employment locations (both within and outside the District), to encourage shorter journeys and greater use of active transport

Full text:

The role of the District in generating inward and outward flows of commuter traffic (principally to/from Coventry and Birmingham) should be highlighted. To minimise carbon emissions from current and future traffic flows the DPD should explicitly favour new development with minimum dwelling densities (NPPF paras 124/5) especially along public transport routes; and co-located as far as practical with planned employment locations (both within and outside the District), to encourage shorter journeys and greater use of active transport

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72181

Comment

2 National Context**Respondent:** Mr Colin Quinney [15655]**Summary:**

Support the objective to bring forward Future Homes Standard policies in Warwick District. However could this be more ambitious? Have we considered the policies developed by Bath, Central Lincolnshire, Greater Cambridge for example?

Full text:

Support the objective to bring forward Future Homes Standard policies in Warwick District. However could this be more ambitious? Have we considered the policies developed by Bath, Central Lincolnshire, Greater Cambridge for example?

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72182

Comment

3.1 National Planning Policy Framework (NPPF), July 2021, 3.1 National Planning Policy Framework (NPPF), July 2021**Respondent:** Mr Colin Quinney [15655]**Summary:**

Add reference to paras 124/5 (more efficient dwelling densities) and section 12 paras 126 to 136 (the importance of good design) to put the emphasis on sustainability in a fuller balanced planning context.

Full text:

Add reference to paras 124/5 (more efficient dwelling densities) and section 12 paras 126 to 136 (the importance of good design) to put the emphasis on sustainability in a fuller balanced planning context.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72180

Comment

1.2 About Warwick District

Respondent: Mr Colin Quinney [15655]

Summary:

Incorporate references to minimum dwelling densities and co-location.

Risk of being far from net zero objective if most new homes not and retrofitting is limited.

Include retrofitting standards and planned inspections by zero-engineers. Ambition as well as flexibility required here.
Discourage demolition to minimise net additions of embedded carbon.

Full text:

The role of the District in generating inward and outward flows of commuter traffic (principally to/from Coventry and Birmingham) should be highlighted. To minimise carbon emissions from current and future traffic flows the DPD should explicitly favour new development with minimum dwelling densities (NPPF paras 124/5) especially along public transport routes; and co-located as far as practical with planned employment locations (both within and outside the District), to encourage shorter journeys and greater use of active transport

How can this DPD ensure that new development does not add to the District's deficit if the many thousands of new homes envisaged will NOT be net zero and there will be significant retrofitting?

1.3.1 The objective should also cover standards not just for new buildings but for all retrofitting, refurbishment, conversion and extension projects on existing buildings; and planned sample inspections by trained zero-engineers to ensure objective emissions are being sustained.

It is recognised that these standards may need to be more practical and flexible for existing buildings but should be as explicit and ambitious as possible. They also need to reflect an associated objective to encourage refurbishment of old stock rather than demolition/newbuild in order to minimise net additions to embedded carbon. See comments under section 9 & 10 below

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72185

Comment

3.2 Planning Practice Guidance updated in 2019, 3.2 Planning Practice Guidance updated in 2019

Respondent: Mr Colin Quinney [15655]

Summary:

See last comment. Will new guidance on density and design (Plan, DPD or SPD) be required to incorporate new carbon emission standards?

Full text:

See last comment. Will new guidance on density and design (Plan, DPD or SPD) be required to incorporate new carbon emission standards?

Legally compliant: Not specified



Sound: Not specified

Appear exam: Not specified

Attachments: None

72186

Support

3.3 Warwick District Local Plan 2011-2029, adopted September 2017, 3.3 Warwick District Local Plan 2011-2029, adopted September 2017**Respondent:** Mr Colin Quinney [15655]**Summary:** Useful background**Full text:** Useful background

Legally compliant: Not specified



Sound: Not specified

Appear exam: Not specified

Attachments: None

72187

Support

3.4 Neighbourhood Development Plans (NDPs), 3.4 Neighbourhood Development Plans (NDPs)**Respondent:** Mr Colin Quinney [15655]**Summary:** Useful background**Full text:** Useful background

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72189

Comment

4 Aims and Objectives

Respondent: Mr Colin Quinney [15655]

Summary:

Clarify policy on unregulated emissions

Extend policy to existing building conversions and developments

Toughen 'as early as possible' and commit all developments/refurbishments of WDC land/property from 2022 to net zero.

Clarify if gas is ruled out in 7.3. If not apply specific conditions to enable future low cost retrofitting

Full text:

What does the policy aim to deliver in terms of unregulated energy emissions - is that also net zero? This needs to be made clear.

Not just newbuilds - see detailed Comment under 1.3.

Expand 'earlier where possible' to include a firm commitment to apply this net zero policy to all current and future developments/refurbishments of WDC property and land.

Is gas explicitly ruled out as implied by 7.3? If not, some hard conditions need to be stated and applied to avoid significant additional costs for future owners when fitting air source heat pumps:

- No combi boilers
- No microbore pipes
- Need to allow internal space for a hot water cylinder and heat store.
- The cylinder should be equipped with an immerser linked to the PV panels.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72190

Comment

4.1 Aim, 4.1 Aim

Respondent: Mr Colin Quinney [15655]

Summary:

Covered in previous Comment

Full text:

Covered in previous Comment

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72191

Comment

4.2 Objectives, 4.2 Objectives**Respondent:** Mr Colin Quinney [15655]**Summary:**

4.2.1 needs to be reworded as zero carbon on new builds will not be achieved or sustained - see comments under 1.3 and 4.1 above.

Full text:

4.2.1 needs to be reworded as zero carbon on new builds will not be achieved or sustained - see comments under 1.3 and 4.1 above.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72193

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Mr Colin Quinney [15655]**Summary:**

Not just a strategy for newbuilds.

Set higher standards than anticipated 2025 national ones.

SAP and SBEM out of date and poor methodologies for calculating emissions eg performance gap not measured - see Jan 22 WDC policy review

We must have robust and specific tools here eg PHPP and with scope for LPA to update and toughen as methodologies improve.

Specify achieved energy standards test of all newbuilds at 9 years within 10 year guarantee period.

Why lim it standards to buildings over 1000sqm? What standards apply to smaller buildings?

Full text:

Not just newbuild - see earlier comments

5.4 Can we legally set higher standards than the anticipated 2025 national one ? If so we should as national policy has often lagged behind the urgency required by the emergency.

5.7/5.8.5.9 SAP and SBEM may be out of date and relatively poor methodologies for calculating emissions - the draft DPD itself seems to imply the performance gap is not measured (5.9); and a Jan 22 WDC policy review states Unfortunately, the calculation methods used in Building Regulations Part L (SAP and SBEM) are very poor predictors of the actual energy use of a building. SAP and SBEM are compliance tools, not really tools to predict energy and carbon performance (even though they purport to be). This is not only due to out-of-date carbon factors used for different energy sources, but the entire methodology.

Whatever robust tools we do select as accurate here should be specific eg PHPP which others have adopted, not left open for developers' decision with the phrase 'such as'.

The LPA must also be permitted to update the list of acceptable tools within this DPD as technology and experience indicate

Finally, should we require further testing of achieved energy standards at 9 years (before new House quality guarantee expires) to ensure any performance slippages over the short-term life of the buildings are rectified for the long-term.

5.11 Why are standards limited to new buildings of over 1000sqm. What standards will smaller buildings be expected to meet?

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72194

Comment

6 Reducing Energy Demands: Energy Efficient Buildings

Respondent: Mr Colin Quinney [15655]

Summary:

DPD should require solar panels as default on all developments to reflect the latest technology which enables successful installation even on oblique roofs. The clear WDC objective should be to encourage installation on all roofs.

WDC should apply higher standards than the anticipated 2025 National future Homes Standard if legal? Can this be done where the trade-off costs v carbon emission reduction is reasonable (whole life cost analysis)?

The DPD should explicitly allow the LPA to vary such standards as technology and experience evolve

All plans (new and retro) to include reskilling/upskilling of existing workers in clean/green and apprenticeship funds.

Full text:

DPD should require solar panels as default on all developments to reflect the latest technology which enables successful installation even on oblique roofs. The clear WDC objective should be to encourage installation on all roofs.

WDC should apply higher standards than the anticipated 2025 National future Homes Standard if legal? Can this be done where the trade-off costs v carbon emission reduction is reasonable (whole life cost analysis)?

The DPD should explicitly allow the LPA to vary such standards as technology and experience evolve

All plans (new and retro) to include reskilling/upskilling of existing workers in clean/green and apprenticeship funds.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72195

Comment

7 Energy sources

Respondent: Mr Colin Quinney [15655]

Summary:

The potential 'feasibility' or 'viability' loophole should be removed or at least drastically redrafted to reflect NPPF policy and guidelines (para 2 of draft policy). These clearly indicate that lack of profitability on a scheme will primarily require adjustment to land purchase value not to the delivery of key Plan policies - of which this DPD will be a top priority for the foreseeable future. And that any issues of viability must be raised at or before a planning application is submitted.

Is gas ruled out by 7.3? Can it be made less ambiguous (see fuller comment in 4.1)

Full text:

The potential 'feasibility' or 'viability' loophole should be removed or at least drastically redrafted to reflect NPPF policy and guidelines (para 2 of draft policy). These clearly indicate that lack of profitability on a scheme will primarily require adjustment to land purchase value not to the delivery of key Plan policies - of which this DPD will be a top priority for the foreseeable future. And that any issues of viability must be raised at or before a planning application is submitted.

Is gas ruled out by 7.3? Can it be made less ambiguous (see fuller comment in 4.1)

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72197

Comment

8 Carbon Offsetting**Respondent:** Mr Colin Quinney [15655]**Summary:**

Option to upgrade completed building efficiency may be possible and preferable to a carbon offset payment; this should be made clear in the policy.

If it is necessary to include offsetting (which we do not favour) it must pass a stringent technical alternative test and NOT be permitted simply as an easier or cheaper option.

If a 9-year performance reassessment is required as suggested elsewhere, the same option - upgrade to original standard or costly carbon offset - should also be in the policy.

Will WDC set an example by committing not to seek carbon offset solutions to efficiency challenges?

Full text:

Option to upgrade completed building efficiency may be possible and preferable to a carbon offset payment; this should be made clear in the policy.

If it is necessary to include offsetting (which we do not favour) it must pass a stringent technical alternative test and NOT be permitted simply as an easier or cheaper option.

If a 9-year performance reassessment is required as suggested elsewhere, the same option - upgrade to original standard or costly carbon offset - should also be in the policy.

Will WDC set an example by committing not to seek carbon offset solutions to efficiency challenges?

Legally Not specified

compliant:

Sound: Not specified

Appear exam: Not specified

Attachments: None

72198

Comment

9 Embodied Carbon**Respondent:** Mr Colin Quinney [15655]**Summary:**

Why is whole life calculation limited to larger developments and buildings?

9.3 Be specific on tests used - not 'such as' while leaving it to LPA to bring in improved standards and methods

Explicit preference for refurbishment and repurposing of buildings to minimise adding to embodied carbon to be clear requirement.

Consider sliding scale carbon offset charge for all demolitions linked to how far new design achieves zero carbon.

Full text:

Why is a whole-life calculation required only for 50+ dwellings and 5000sqm+ other buildings and not for all developments.

9.3 Be more specific on which test or tests should be applied - not 'such as'; but leave it open to the LPA to change the list of acceptable tests as technology and experience require (Same comment as on 5.9 above).

WDC preference for refurbishment and repurposing of buildings to minimise adding to embodied carbon should be made explicit and apply to most developments of all sizes.

Could a carbon offset charge be made on the additional embodied carbon required for every demolition/newbuild project on a sliding scale related to how closely the new building(s) are designed to achieving zero carbon?

Legally Not specified

compliant:

Sound: Not specified

Appear exam: Not specified

Attachments: None

72199

Comment

10 Existing Buildings**Respondent:** Mr Colin Quinney [15655]**Summary:**

Support this outline policy but more specific guidance/policy adjustments are needed for example to enable -

- use of non-traditional materials in conservation areas eg windows
- installation of double glazing on all pre-1914 buildings, both in and outside Conservation areas, with minimal visual harm.
- installation of solar panels/heat pumps on these buildings - but only to supplement the benefits of modern double glazing which should be a policy priority.

Explicit priority to be given to schemes which alleviate energy poverty in all tenures - can this be incentivised in some ways?

Full text:

Support this outline policy but more specific guidance/policy adjustments are needed for example to enable -

- use of non-traditional materials in conservation areas eg windows
- installation of double glazing on all pre-1914 buildings, both in and outside Conservation areas, with minimal visual harm.
- installation of solar panels/heat pumps on these buildings - but only to supplement the benefits of modern double glazing which should be a policy priority.

Explicit priority to be given to schemes which alleviate energy poverty in all tenures - can this be incentivised in some ways?

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72201

Support

12 Warwick District Local Plan 2011-2029 - Policies superseded or amended by this DPD**Respondent:** Mr Colin Quinney [15655]**Summary:**

Needs to toughen and supersede former policies

Full text:

Needs to toughen and supersede former policies

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72202

Support

Glossary**Respondent:** Mr Colin Quinney [15655]**Summary:**

No comments

Full text:

No comments

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72200

Comment

11 Viability**Respondent:** Mr Colin Quinney [15655]**Summary:**

Remove feasibility or viability loophole from policy altogether. If not, then drastically redraft to reflect NPPF policy and guidelines eg remove para 11.2

Full text:

The potential 'feasibility' or 'viability' loophole should be removed or at least drastically redrafted to reflect NPPF policy and guidelines (para 2 of draft policy). These clearly indicate that lack of profitability on a scheme will primarily require adjustment to land purchase value not to the delivery of key Plan policies - of which this DPD will be a top priority for the foreseeable future. And that any issues of viability must be raised at or before a planning application is submitted. Same comment as in 7 above.

This policy needs at least redrafting - 11.2 perhaps removing - to minimise attempts to use it as a loophole to overcome NPPF guidance and the top local priority given to tackling the climate emergency.

Legally compliant: Not specified

Sound: Not specified

Appeal exam: Not specified

Attachments: None

72183

Object

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Mr Steve Russell [15483]**Summary:**

I do not agree with this policy and feel it will just add unnecessary cost to people that are already struggling.

Full text:

I do not agree with this policy and feel it will just add unnecessary cost to people that are already struggling.

Legally compliant: Not specified

Sound: Not specified

Appeal exam: Not specified

Attachments: Consultation Response - <https://warwickdc.oc2.uk/a/s8mq>

72216

Comment

4 Aims and Objectives**Respondent:** Taylor Wimpey [14433]**Agent:** RPS Group (Mr Jacob Bonehill, Associate Director - Planning) [15583]**Summary:**

Taylor Wimpey is supportive in principle of the Council's ambition to achieve net zero carbon emissions from new development, however they maintain their concerns with the approach proposed in the DPD.

Full text:

Please see attached.

Legally compliant: Not specified

Sound: Not specified

Appeal exam: Not specified

Attachments: Consultation Response - <https://warwickdc.oc2.uk/a/s8nh>

72218

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Taylor Wimpey [271]**Agent:** Barton Willmore (Holly Martin, Senior Planner) [15671]**Summary:**

Please see attached.

Full text:

Please see attached.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8nj>

72203

Comment

4 Aims and Objectives**Respondent:** The Coal Authority (Christopher Telford, Principal Development Manager) [15467]**Summary:**

We have no specific comments to make.

Full text:

Having reviewed your document, I confirm that we have no specific comments to make on it.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** Consultation Response - <https://warwickdc.oc2.uk/a/s8n4>

72176

Support

Policy NZC4: Existing Buildings**Respondent:** The Theatres Trust (Mr Tom Clarke MRTPI, National Planning Adviser) [218]**Summary:**

As set out in our representation at the previous stage, Theatres Trust is supportive of this document coming forward with its additional policy and guidance provided to applicants. We particularly welcome this policy, as from our perspective it is important for there to be guidance for existing buildings including heritage assets which will include the district's theatres.

Full text:

As set out in our representation at the previous stage, Theatres Trust is supportive of this document coming forward with its additional policy and guidance provided to applicants. We particularly welcome this policy, as from our perspective it is important for there to be guidance for existing buildings including heritage assets which will include the district's theatres.

Legally compliant: Not specified**Sound:** Not specified**Appear exam:** Not specified**Attachments:** None

72172

Comment

Policy NZC1: Achieving Net Zero Carbon Development**Respondent:** Mr Keith Thompson [15656]**Summary:**

I can see no direct justification for the particular targets set out in the policy (minimum 63% and 30% reductions). Both seem unambitious. It would be good to include a phrase like "carbon neutral or negative buildings will be prioritised but the minimum..."

Full text:

I can see no direct justification for the particular targets set out in the policy (minimum 63% and 30% reductions). Both seem unambitious. It would be good to include a phrase like "carbon neutral or negative buildings will be prioritised but the minimum..."

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72173

Comment

Policy NZC2(A): Making buildings energy efficient**Respondent:** Mr Keith Thompson [15656]**Summary:**

The target of 10% is very unambitious and should be raised to 25%. It would also be good to include a phrase like "measures which achieve neutral or negative carbon emissions will be prioritised but the minimum..."

Full text:

The target of 10% is very unambitious and should be raised to 25%. It would also be good to include a phrase like "measures which achieve neutral or negative carbon emissions will be prioritised but the minimum..."

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72174

Support

Policy NZC3: Embodied Carbon**Respondent:** Mr Keith Thompson [15656]**Summary:**

The whole life assessment is critical to tackling the climate crisis

Full text:

The whole life assessment is critical to tackling the climate crisis

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72175

Comment

Policy NZC4: Existing Buildings**Respondent:** Mr Keith Thompson [15656]**Summary:**

The policy is right in principle but rather too weak. It should not just encourage alternative to fossil-fuel boilers but recognise all forms of reduction of carbon dependency.

Full text:

The policy is right in principle but rather too weak. It should not just encourage alternative to fossil-fuel boilers but recognise all forms of reduction of carbon dependency.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: None

72214

Comment

4 Aims and Objectives**Respondent:** Warwick district council (Graham Tomlinson, Housing Strategy and Enabling Officer) [15670]**Summary:**

Please see attached.

Full text:

Please see attached.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: Consultation Response - <https://warwickdc.oc2.uk/a/s8nf>

72211

Comment

5 Overarching strategy – Achieving Net Zero Carbon Development**Respondent:** Warwick District Green Party (Cllr John Dearing, Councillor) [15669]**Summary:**

Please see attached.

Full text:

Please see attached.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: Consultation Response - <https://warwickdc.oc2.uk/a/s8nc>

72219

Comment

4 Aims and Objectives

Respondent: Warwickshire Climate Alliance (David Mond) [15673]

Summary:

We are glad the council is looking to adopt a document intended to 'ensure all new developments (as set out on para 5.11) should be net zero carbon in operation.' (4.1.1)

However, we believe the approach it has taken does not meet the best standards of building performance, and that it will not achieve the aim of ensuring new buildings are net zero carbon in operation.

Full text:

Please see attached.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: Consultation Response - <https://warwickdc.oc2.uk/a/s8nk>

72209

Support

4 Aims and Objectives

Respondent: Warwickshire County Council (Tony Lyons, Principal Planning Officer) [212]

Summary:

WCC fully supports the proposed Plan and all efforts to meet the council's target of net zero carbon by 2030 and the government target of meeting net zero carbon nationally by 2050.

WCC Ecology, Historic Environment & Landscape have provided feedback stating that it fully supports the WDC Net Zero Carbon DPD and has no further comments to make. WCC is in support of its enactment in the preparation of the Warwickshire ecosystem service market trading protocol.

Full text:

Please see attached.

Legally compliant: Not specified

Sound: Not specified

Appear exam: Not specified

Attachments: Consultation Response - <https://warwickdc.oc2.uk/a/s8nv>