



# Warwick District Council Net Zero Carbon DPD Schedule of Proposed Minor Changes

Warwick District

Prepared for: Warwick District Council

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# 1 Schedule of Proposed Additional Changes

- 1.1 This document comprises a schedule of proposed minor changes to the Net Zero Carbon DPD. Minor changes to the Plan involve rectifying typographical errors and providing factual clarifications to existing wording in the Plan. These have been brought to the attention of the Council through representations made at the Regulation 19 stage.

Reference	Page number	Policy/ Paragraph	Change required	Reason for change
PMC1	07	1.3.1	<p>This DPD aims to focus on minimising carbon emissions from <b>existing</b> and new buildings within the District to support the achievement of national and local carbon reduction targets.</p> <p><del>In achieving this aim, the DPD will ensure that new development does not add to the District's carbon deficit and will therefore ensure that the significant cost of retrofitting buildings to achieve net zero carbon does not increase.</del></p> <p><u>To work towards this aim, the DPD is designed to ensure that new development's contribution to the District's carbon deficit is minimised and that new homes do not add to the significant number of existing buildings in the District that will need costly and disruptive retrofit as part of the local and national transition to achieve net zero carbon. By bringing forward performance standards equivalent to the Future Homes Standard (two years in advance of its national introduction) the new homes should not need future retrofit, and by collecting carbon offset payments the DPD will raise funds to deliver other vital but currently underfunded actions necessary for the national and local transition to net zero – such as additional renewable energy, retrofit of other existing buildings, or creation of woodland.</u></p>	For factual clarification. The DPD relates to regulated operational energy and does not include unregulated energy and associated emissions. The DPD will ensure that the contribution to the District's carbon deficit is minimised.
PMC2	09	2.6	<p>Given the significant proportion of emissions nationally that stem from buildings, it is a key part of the Government's strategy to improve building standards. As a result, the Government has published <del>its intentions to introduce</del> new Building Regulations during 2022, updating Part L for new homes and non-domestic buildings as a first step towards a Future Homes Standard. The new Building Regulations <b>will</b> require standards that are expected to reduce emissions from new buildings in comparison with <del>current</del> <b>previous 2013</b> standards by 31%.</p>	For factual clarification. The Government introduced Part L 2021 on 15 <sup>th</sup> June 2022 just after the Regulation 19 consultation.

PMC3	010	2.7	The Government expects the proposals for a Future Homes Standard to “ensure that an average home will produce at least 75% lower CO <sup>2</sup> emissions than one built to current <b>(2013)</b> energy efficiency requirements. In the short term this represents a considerable improvement in the energy efficiency standards for new homes. Homes built under the Future Homes Standard will be ‘zero carbon ready’, which means that in the longer term, no further retrofit work for energy efficiency will be necessary to enable them to become zero-carbon homes as the electricity grid continues to decarbonise.”	For factual clarification. The Government introduced Part L 2021 on 15 <sup>th</sup> June 2022 just after the Regulation 19 consultation. The reference to a 75% reduction in this quote is in relation to previous 2013 building regulations.
PMC4	016	4.1.1	This DPD aims to focus on minimising carbon emissions from <b>existing</b> and new buildings within the District to support the achievement of national and local carbon reduction targets.	For factual clarification. The DPD also relates to existing buildings through Policy NZC4.
PMC5	016	4.1.2	<del>In achieving this aim, the DPD will ensure that new development does not add to the District’s carbon deficit and will therefore ensure that the significant cost of retrofitting buildings to achieve net zero carbon does not increase.</del>  <u>To work towards this aim, the DPD is designed to ensure that new development’s contribution to the District’s carbon deficit is minimised and that new homes do not add to the significant number of existing buildings in the District that will need costly and disruptive retrofit as part of the local and national transition to achieve net zero carbon. By bringing forward performance standards equivalent to the Future Homes Standard (two years in advance of its national introduction) the new homes should not need future retrofit, and by collecting carbon offset payments the DPD will raise funds to deliver other vital but currently underfunded actions necessary for the national and local transition to net zero – such as additional renewable energy, retrofit of other existing buildings, or creation of woodland.</u>	For factual clarification. The DPD relates to regulated operational energy and does not include unregulated energy and associated emissions. The DPD will ensure that the contribution to the District’s carbon deficit is minimised.

PMC6	016	4.2.1	Objective 1: To provide a clear policy framework to enable developers to understand the requirements for planning proposals to ensure new buildings are planned and constructed to have net zero <b>regulated</b> carbon in operation.	For factual clarification that the DPD relates to regulated operational energy and associated carbon emissions.
PMC7	016	4.2.2	Objective 2: To ensure practical and viable low carbon building standards that can be applied to new <b>and existing</b> buildings.	For clarification that the DPD also includes standards that can be applied to existing buildings in Policy NZC4
PMC8	019	5.2	This strategy has been designed to deliver the objectives set out in section 4 above. The focus is on providing a practical and viable approach to deliver new development which is net zero carbon in operation <b>in relation to regulated operational energy – in other words the net zero carbon emissions will occur following completion of the development.</b>	For factual clarification that the DPD relates to regulated operational energy and associated carbon emissions.
PMC9	019	5.6	3: Carbon Offsetting. Developments that result in residual operational carbon emissions having incorporated stage 1 and stage 2, will be subject to carbon offsetting requirements to bring the total operational carbon emissions ( <b>regulated energy</b> ) to net zero.	For factual clarification that the DPD relates to regulated operational energy and associated carbon emissions.
PMC10	020	Figure 1	Stage 2: Zero and Low Carbon Energy Sources and Technologies <b>NZC2(B)</b>	To correct the reference from NC2(B) to NZC2(B)
PMC11	020	Figure 1	Amend final text box to state 'Operation Net Zero ( <b>Regulated Energy</b> )'	For factual clarification that the DPD relates to regulated operational energy and associated carbon emissions.
PMC12	026	Policy NZC2(B)	New development of one or more new dwellings (C3 or C4 use class) and/or 1,000sqm or more of new non-residential floorspace, hotels (C1 use class), or residential institutions (C2 use class) should demonstrate through an energy statement that additional renewable, zero and low carbon energy technologies have been provided on-site* to achieve the carbon reductions required by Policy NZC1 and achieve on-site net zero <b>regulated</b> operational carbon wherever possible.	For factual clarification that the DPD relates to regulated operational energy and associated carbon emissions.

PMC13	035	10.2	For existing buildings an average heating energy demand of 40kWh/m <sup>2</sup> /yr should be used as a target for proposals involving alterations, extensions and changes of use. Detailed guidance for existing buildings is provided by LETI's Climate Emergency Retrofit Guide <sup>8</sup>	To correct that the units for heating energy demand should be expressed as kWh/m <sup>2</sup> /yr
PMC14	037	12.1	12.1 The following Local Plan policies will be superseded or amended by this DPD:  • <b>Expands Policy CC3:</b> Building Standards and other Sustainability Requirements <del>is superseded</del>	To correct that Policy CC3 is expanded and the requirements of Policy CC3 in relation to BREEAM standards are not superseded.
PMC15	040	Glossary	Add definition of Unregulated Carbon Emissions  <b><u>Unregulated Carbon Emissions: Unregulated carbon emissions result from the building energy consumption from process and systems that are not 'controlled' by Building Regulations. For example, this could include energy consumption from sources such as IT equipment, lifts, external lighting, cooking, audio-visual equipment and other appliances.</u></b>	To assist with clarification that the DPD relates to regulated operational energy and associated carbon emissions.
PMC16	042	Glossary	Add definition of Operational Energy  <b><u>Operational energy: Operational energy comprises regulated and unregulated energy consumption. The regulated energy is building energy consumption resulting from the specification of controlled, fixed building services and fittings, including space heating and cooling, hot water, and ventilation while the unregulated energy is the energy consumption that is not controlled by Building Regulations, including, but not limited to, energy consumption from IT equipment, lifts, and appliances.</u></b>	To assist with clarification that the DPD relates to regulated operational energy and associated carbon emissions.