

## **Matter 4: Reducing energy demands: energy efficient buildings**

### **Issue**

Does Policy NZC2(A) provide the effective and reasonable approach to achieving energy efficient buildings that the DPD requires to ensure the best use of energy resources and to facilitate a faster transition to low carbon energy sources? Is the Policy approach justified and consistent with national policy?

### **Questions**

- 1. Are the requirements within Policy NZC2(A) justified and is the approach of the policy reasonable, justified and effective?**
  - 1.1 We do not support the introduction of policy NZC2(A) as it has not been justified sufficiently in regard to viability over the uplift to the Part L 2021 TFEE. Energy efficiency is vital for net zero development but overly onerous requirements that go beyond national policy is likely to lead to issues with delivery and/or reduce available funds for other important aspects of sustainable living such as green and blue infrastructure and active travel.
- 2. How do the requirements of Policy NZC2(A) – Making Buildings Energy Efficient sit against the adopted Warwick Local Plan and its relevant policies?**
  - 1.2 It is accepted that focusing on energy efficiency is the appropriate first step towards net zero carbon buildings and is universally accepted as the first stage of the energy hierarchy. Requiring developments to be energy efficient is supported in principle and delivers wide ranging benefits, including reduced running costs passed on to occupiers. The evidence base and justification provided for the policy detail is not however considered to be sufficiently robust. Similar policy from Milton Keynes Local Plan (adopted 2019) and the London Plan 2021 has been reviewed and used as justification for NZC2(A). The reviewed policies require 19% and 10% reduction over Part L 2013 respectfully, but the supporting evidence does not explain how they have related this to the new Part L 2021 methodology, which would be required to be considered a robust example of viability.
- 3. Is Policy NZC2(A) consistent with the adopted Warwick Local Plan and with national policy and is it soundly based?**
  - 1.3 It is important to undertake a comparison against the Building Regulations industry best practice, or other similar policies .Point 6.5 of the DPD states that the 10% improvement in dwelling fabric efficiency is set to reflect the approximate uplift to building fabric between Part L 2021 and the indicative Future Homes Standard 2025, however no evidence has been provided to support this figure.
  - 1.4 Part L 2021 contains a significant reduction in the Target Fabric Energy Efficiency (TFEE) compared to Part L 2013. Beta testing for Part L 2021 software has shown an approximately 15-25% reduction in the TFEE between 2013 and 2021 assessments for the same notional dwelling (see Appendix 1). The proposed NZC2(A) policy applied to Part L 2021 standards would increase the fabric efficiency standards by up to 35% over current Building Regulations. This is considered to

Barton Willmore, now Stantec on behalf of:  
IM Land, Persimmon and Taylor Wimpey

be excessive and exceeds a proportionate standard for local policy with likely detrimental effects on delivery and could redirect money from other important aspects of sustainable placemaking .

1.5 The fabric energy performance of a building can be heavily influenced by its build form, and it is considered that viability testing should be carried out to test whether this target is practicable and feasible for all building types and build forms.

**4. Does Policy NZC2(A) have sufficient flexibility built into its application to be effective?**

The policy allows for justification to be provided for development that cannot comply with the policy, which given that the viability testing is in question, is considered necessary. Building position and orientation plays an important role in the level of energy efficiency that can be achieved, as well as building materials and design. Some sites/locations will therefore be at a disadvantage to others so some inbuilt flexibility is considered essential. Different types of developments will also be more constrained and less able to meet such high standards, but may be able to contribute to a decarbonised built environment in other ways, e.g. through generating renewable energy, promoting sustainable transport etc.

**5. How will Policy NZC2(A) contribute to the aims and objectives of the DPD and facilitate a faster transition to the greater use of low carbon energy sources?**

The focus on energy efficiency as a first step in reducing emissions from buildings is supported as the more efficient a building, the less energy is required in its operation. It is considered to contribute to achieving the aims and objectives of the DPD. By reducing energy demand to start with, less energy is required to be generated from on-site renewables, potentially reducing the cost of installing equipment. There is also the potential for net zero ready development to take advantage of the increasingly decarbonised grid. The policy itself won't necessarily facilitate a faster transition to greater use of low carbon energy sources, however. The FHS, Building Regulations and national net zero commitment is driving both retrofit and the technology permissible in new buildings.

**6. What impact will the requirements of Policy NZC2(A) have on development delivery, including housing?**

Energy efficient buildings do reduce the running costs and through using passive design principles, comfortable summer and winter temperatures can be achieved. However, in the current market conditions, built costs are higher for the highest levels of energy efficiency. Overly onerous requirements that go beyond national policy is likely to lead to issues with delivery and/or reduce available funds for other important aspects of sustainable living such as green and blue infrastructure and active travel. Flexibility within the policy as written will ensure that a holistic approach to low carbon design, with limitations and other solutions judged on a case-by-case basis.