
Matter 4 Hearing Statement

Warwick Zero Carbon Development Plan
Document Examination

Response on Behalf of Barratt David Wilson
Homes (Mercia)

Representor ID: 3

Questions: 4.1, 4.2, 4.3, 4.4 and 4.5



Contents

1.	Introduction	1
1.1.	Introduction.....	1
2.	Matter 4: Reducing Energy Demands: energy efficient buildings	1
2.1.	Question 4.1.....	1
2.2.	Question 4.2.....	2
2.3.	Question 4.3.....	3
2.4.	Question 4.4.....	3
2.5.	Question 4.5.....	3
2.6.	Question 4.6.....	4

1. Introduction

1.1. Introduction

- 1.1.1. Savills has been instructed by Barratt David Wilson Homes (Mercia), referred to hereafter as “BDWH”, to submit a Hearing Statement in response to Matter 4 (Questions 4.1, 4.2, 4.3, 4.4 and 4.5) of the Warwick Zero Carbon Development Plan Document Examination. BDWH has a number of land interests in Warwick District. Through this DPD Examination BDWH is questioning the speed at which Warwick District Council (WDC) is seeking to bring in its new policies and the robustness of the evidence underpinning these policies.
- 1.1.2. BDWH is part of the national Barratt Developments Plc, which has been involved in housebuilding for over 60 years. Barratt Developments is supportive of the decarbonisation agenda and has already put a number of initiatives in place, including following its own Zero Carbon Home Roadmap, through which it aims for all of its house types to be zero carbon (regulated only) by 2030.

2. Matter 4: Reducing Energy Demands: energy efficient buildings

2.1. Question 4.1

“Are the requirements within Policy NZC2(A) justified and is the approach of the policy reasonable, justified and effective?”

- 2.1.1. The justification for the Draft Policy position appears to be based on the assertion that a 10% improvement against Part L 2021 is the difference between the Part L 2021 position and the proposed Future Homes standard in relation to U-values and air tightness.
- 2.1.2. The evidence base set out within the Revised Viability Study in relation to the proposed 10% improvement makes reference to 2017 data collected from studies focusing on London and the reduction requirements set out within the Milton Keynes Local Plan (adopted in 2019). The information includes reduction percentages for these two areas which are measured against the Part L 2013 position, but these percentages are not translated into the equivalent improvement when measured against the Part L 2021 position. It is therefore not clear from the evidence base how the two examples used provide relevant viable, deliverable justification that the proposed Draft Policy target is locally achievable for Warwick District.

2.1.3. In relation to the proposed requirement for all major residential developments to implement a recognised quality regime that ensures that as-built performance (energy use, carbon emissions, indoor air quality and overheating risk) matches calculated design performance BDWH has trialled as-built assessments across a small proportion of its sites nationally and would like to make WDC aware of some important issues that should still be taken into consideration through the DPD process:

- a) There are registered inconsistencies between the currently available as-built testing methodologies which could undermine the robustness of any assessment submitted. Testing methodologies need to undergo more rigorous testing and application before they are rolled out at scale.
- b) There are a limited number of companies offering as-built testing and many, if not all, are still principally in the Research and Development stage. It is unlikely that, upon Local Plan adoption, the current sector will be able to cope with the demand of development assessment, with a potential consequential delay to housing delivery arising.
- c) Key elements of the current as-built assessment methodology can only be undertaken in Winter. This would effectively preclude large sections of a development from being tested and undermine the robustness of any submitted assessment.

2.1.4. Based on these issues that BDWH has experienced first-hand, it is requested that WDC reconsiders the requirement for immediate implementation of as-built assessments in the DPD and instead considers rolling out this requirement at a later date, through the emerging South Warwickshire Local Plan, once the Government undertakes further national-scale research projects into their implementation. It is not considered that the WDC evidence base has adequately demonstrated that the current as-built assessment sector will be able to meet and deliver the resultant assessment demand arising from future planning applications.

2.2. Question 4.2

“How do the requirements of Policy NZC2(A) – Making Buildings Energy Efficient sit against the adopted Warwick Local Plan and its relevant policies?”

2.2.1. The Draft DPD does not specifically explain the intended interface between this proposed policy and the requirements of adopted Warwick District Local Plan Policy CC1(a).

2.3. Question 4.3

“Is Policy NZC2(A) consistent with the adopted Warwick Local Plan and with national policy and is it soundly based?”

2.3.1. In addition to the wider concerns with the Revised Viability Study identified in response to Matter 3, it is noted that the Regulation 19 consultation document¹ acknowledges that the proposed policy approach is based on the achievement of notional values set out within a standard that is neither in force (and therefore is not yet currently a national requirement) nor informed by national estimated cost data. It is therefore not considered to be clear as to how this demonstrates a robust and certain position which the development industry is able to viably deliver upon the adoption of the DPD.

2.4. Question 4.4

“Does Policy NZC2(A) have sufficient flexibility built into its application to be effective?”

2.4.1. The inclusion of an ability within this policy to not comply with the target, subject to demonstrating carbon reductions to the greatest extent feasible through energy efficiency measures, is considered to be helpful. However this should not be seen to be a substitute for having a policy requirement which development industry is able to viably deliver upon the adoption of the DPD. The soundness of the policy should still be demonstrated to avoid a potentially unnecessarily onerous need for developers to have to submit further information within energy statements to justify non-compliance.

2.5. Question 4.5

“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?”

2.5.1. The emerging DPD is due to be adopted in mid-2023, circa 2 years ahead of the proposed introduction of the Future Homes Standard on a national basis. As set out in response to Question 4.1, and within the Statement submitted in relation to Matter 2, the housebuilding industry, and the supporting supply chain, is following the Future Homes target routemap and is not yet fully set up for the early introduction of the Future Homes Standard. WDC should facilitate a transitional period to enable house building to continue at a rate

¹ Draft Policy NZC2(A) and para 6.5 of the Warwick District Council Net Zero Carbon Development Plan Consultation Document April 2022.

which enables housing need to still be met and a greater use of low carbon technologies to happen in line with the wider national approach. This may otherwise lead to a reduction in the ability to viably deliver housing upon the adoption of the DPD.

2.6. Question 4.6

“What impact will the requirements of Policy NZC2(A) have on development delivery, including housing?”

- 2.6.1. As set out in the response to Matter 2 the majority of national housebuilders, in line with industry expectations and standards, will generally only be set up to deliver to current Building Regulation Part L standards. This may result in some national housebuilders needing to adopt a more costly bespoke approach to sites that they deliver in Warwick District in advance of the introduction of higher standards at a national level. The labour force, supply chain and technology for enabling the implementation of the policy provisions is also not currently readily available.
- 2.6.2. This could act as a barrier to, and / or increase the timescales for, delivering viable residential development in Warwick District and thus adversely affect the supply and affordability of new homes (both market & affordable housing).

Hearing Statement

Warwick Zero Carbon DPD Examination



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