
Matter 5 Hearing Statement

Warwick Zero Carbon Development Plan
Document Examination

Response on Behalf of Barratt David Wilson
Homes (Mercia)

Representor ID: 3

Questions: 5.1, 5.2, 5.3 5.4 and 5.5



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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 5 (Questions 5.1, 5.2, 5.3 5.4 and 5.5) 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 5: Energy Sources

2.1. Question 5.1

“Is the approach of Policy NZC2(B) – Zero or Low Carbon Energy Sources and Zero Carbon Ready Technology reasonable, justified and effective?”

- 2.1.1. The presumption of proposed Policy NZC1 is that an overall 63% reduction in carbon emissions will be achieved compared to Part L 2021. As set out in the Statement submitted in response to Matter 2, this is not considered to be the most reasonable starting point.
- 2.1.2. Sufficient regard still needs to be given to the requirement for: suitable technologies to be established, tested and made more affordable; increased decarbonisation of the electricity grid to take place; the necessary supply chains to be established; and the construction approach and labour force to be ready to implement the necessary measures. BDWH also has concerns over whether the Revised Viability Study¹

¹ Net-Zero Carbon Development Plan Document: Revised Viability Study. April 2022. Prepared by BNP Paribas Real Estate.

provides a suitable basis for justifying the imposition of the requirements set out in the DPD. Further commentary in relation to this is set out in response to Matter 3.

- 2.1.3. BDWH recognises that the NPPF identifies that the planning system should support the transition to a low carbon future, including supporting the delivery of renewable and low carbon infrastructure² and that Local Plans should identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. BDWH endorses the benefits that low carbon and renewable energy supplies can bring, but considers that the potential quantum and deliverability of such technologies that might be required under proposed Policy NZC2(B) in order to meet the standards set out under proposed Policy NCZ1 has not been sufficiently appraised through the evidence base produced to support the emerging DPD to enable it to be viably delivered upon the adoption of the DPD.

2.2. Question 5.2

“Does Policy NZC2(B) accord with national policy and does it relate properly to the adopted Warwick Local Plan and its relevant policies?”

- 2.2.1. As set out in the response to Question 5.1, BDWH recognises that the approach being sought through proposed Policy NCZ2(B) takes forward objectives for the delivery of decentralised, renewable or low carbon energy supply systems. The Draft DPD does not specifically explain the interface between this proposed policy and the requirements of adopted Warwick District Local Plan Policy CC1(a).

2.3. Question 5.3

“Does Policy NZC2(B) have sufficient flexibility within its application to be effective and have a sound basis?”

- 2.3.1. The inclusion of an ability within this policy to not comply with the target, subject to demonstrating through a submitted energy statement that additional renewable / zero carbon / low carbon energy technologies have been provided to the greatest extent feasible and viable, and / or incorporated ‘zero carbon ready’ technologies’, 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 wider framework for this proposed policy set by proposed Policy NZC1 should (as set out

² National Planning Policy Framework (2021) paragraph 152.

in the Statement submitted in response to Matter 2) 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.

2.4. Question 5.4

“Does Policy NZC2(B) and the DPD provide sufficient clarification or guidance as to the types of technology or energy sources that would be most appropriate in certain locations and proposals? If not, should this be provided and how would this be most appropriately addressed?”

- 2.4.1. It is noted that neither the Regulation 19 consultation document³ nor the justification included within Appendix 6 of the Revised Visibility Study⁴ demonstrate and explain, with reference to appropriate examples, what technologies might be feasibly and viably deliverable on-site in a local Warwick District context.
- 2.4.2. The reference given in Appendix 6 of the Revised Visibility Study to the fact that the adopted 2020-2036 Oxford Local Plan includes a carbon emissions reduction policy is not considered to provide a direct comparable to justify either the approach taken within Draft NZC Policy 2(B) or the overall identified quantum of carbon emissions reduction sought for application to sites in Warwick District through the DPD.
- 2.4.3. The policy does not need to be overly prescriptive in this regard. However the inclusion of suitable testing of what is expected in certain locations and for certain proposals within the evidence base would assist with providing more clarification. This could then be referenced within the proposed policy wording or within the text supporting the policy.

2.5. Question 5.5

“What impact will Policy NZC2(B) have on development delivery, including housing?”

- 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 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

³ The Warwick District Council Net Zero Carbon Development Plan Consultation Document April 2022.

⁴ Net-Zero Carbon Development Plan Document: Revised Viability Study. April 2022. Prepared by BNP Paribas Real Estate.

facilitate a transitional period to enable house building to continue at a rate 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.

- 2.5.2. 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.
- 2.5.3. 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).

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