
Matter 7 Hearing Statement

Warwick Zero Carbon Development Plan
Document Examination

Response on Behalf of Barratt David Wilson
Homes (Mercia)

Representor ID: 3

Questions: 7.1, 7.2, 7.3, 7.4, 7.5



Contents

1.	Introduction	1
1.1.	Introduction.....	1
2.	Matter 7: Embodied Carbon	1
2.1.	Question 7.1.....	1
2.2.	Question 7.2.....	2
2.3.	Question 7.3.....	2
2.4.	Question 7.4.....	2
2.5.	Question 7.5.....	3

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 7 (Questions 7.1, 7.2, 7.3, 7.4 and 7.5) 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 7: Embodied Carbon

2.1. Question 7.1

“Is the approach of Policy NZC3 – Embodied Carbon justified, effective and consistent with national policy?”

- 2.1.1. Neither the National Planning Policy Framework nor the Planning Practice Guidance require embodied carbon emissions to be measured. The proposed policy wording does not provide any detail in relation to: the application of the embodied carbon assessment; what baseline the assessment will be measured against; and how the outcome of the assessment would be enforced. This may cause issues for developers when producing the requested energy statement. Further clarification is considered to be necessary in relation to these elements in order to demonstrate that the proposal is not considered to be consistent with national policy, justified and effective.

2.2. Question 7.2

“Are the thresholds set out in Policy NZC3 for development with regard to whole-life carbon assessments appropriate and justified?”

2.2.1. Appendix 6 of the Revised Viability Study¹ does not provide justification for why a threshold of 50 dwellings for implementing a whole-life assessment of materials has been chosen for Warwick District. Scenarios involving smaller and larger developments have not been considered. It is also not clear how this requirement has been factored into the Revised Viability Study viability testing. It is accordingly considered that it has not been demonstrated that the chosen thresholds are appropriate and justified.

2.3. Question 7.3

“Does the approach of Policy NZC3 sit comfortably with the adopted Warwick Local Plan and its policies?”

2.3.1. 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).

2.4. Question 7.4

“Are the impositions on developers through Policy NZC3 reasonable and justified?”

2.4.1. Proposed Policy NCZ3 imposes: a need on developers to demonstrate how the embodied carbon of the proposed materials to be used has been considered and reduced; and a need for whole life assessment of materials used to be undertaken for developments of 50 dwellings or more.

2.4.2. BDWH recognises that understanding the embodied carbon of all proposed materials on a development is an important aspect of driving the use of more sustainable practices. Whilst in principle BDWH does not object to a Whole Life Carbon Assessment (WLCA) being required, the BDWH in-house technical experts consider that there are data collection issues impacting on the ability to undertake a proper WLCA. Principally, many manufacturers are still lacking the creation and verification of data for Environmental Product Declarations (EPDs).

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

- 2.4.3. Most EPDs are currently from France or Belgium, because both countries require EPDs for construction products. Whilst there are UK-based EPDs, these are often generic values which will not accurately reflect a completed property, so it is important that WDC allows some tolerance when assessing any submitted WLCA. There are also a few reasons why in the UK we do not have enough of what is needed to carry out WLCAs: a) EPDs are currently taking around 3 years to be created and verified (leading to potential disruption to the supply of homes if a WLCA cannot be provided due to lack of EPDs; b) Manufacturers often have not calculated a Life Cycle Assessment of their products or do not have any carbon data (impacting on the robustness of any submitted WLCA); and c) There is no mandatory requirement for construction products to generate EPDs (again impacting on the robustness of any submitted WLCA).
- 2.4.4. Given the extent of information required to provide a meaningful WLCA, careful consideration would be required around the timing of submission to the Council. We would suggest that if a WLCA is to be submitted, then it should be required as part of the planning conditions attached to a grant of detailed planning permission. This certainty on what is being built would avoid abortive resource and cost, for both applicants and the Local Planning Authority, because it would prove difficult for applicants to submit a robust WLCA based on outline application parameters. BDWH would strongly advise WDC to obtain further feedback from the development industry about the timing of submitting WLCAs, and include this within the evidence base justification, should it continue to pursue this approach.
- 2.4.5. Based on the narrative and points of clarification set out above it is not considered that the proposed Policy NCZ3 impositions placed on developers are currently reasonably justified.

2.5. Question 7.5

“Does Policy NZC3 have any unacceptable impact on development delivery, including housing?”

- 2.5.1. Proposed Policy NCZ3 places an additional burden on developers. If EPDs are not in place for the construction products then the required assessment process becomes more difficult / time-consuming. Coupled with the uncertainty over the inputs to and the management of the outputs from the assessment process these could collectively delay the viable delivery of new housing.

