



Warwick District Council NZC DPD Examination Matter 8: Existing buildings

Warwick District Council
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Prepared by: Amy Powell
Checked by: Paul Slater and Marina
Goodyear
Authorised by: Andrew Cornfoot

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1 Question 8.1

Does the approach of Policy NZC4 and its requirements have a sound basis, that is reasonable, justified and effective?

- 1.1 Similarly to the policy on embodied carbon, tackling the emissions from existing buildings was a matter raised through the Regulation 18 consultation, and subsequently evidenced and drafted into the DPD. This demonstrates a response to the local communities' desire to see existing buildings' carbon emissions addressed by local planning policy.
- 1.2 The Warwick DC Zero Carbon DPD Energy and Sustainability Policy Review (SUB5, page 19) outlines that tackling carbon emissions from existing building is of paramount and urgent importance based on the overall contribution they make to Warwick's total carbon emissions. Existing buildings represent 42.2% of the District's carbon emissions.
- 1.3 It is also recognised that it will not often be possible to retrofit existing building to the same level of fabric efficiency as new buildings and a different policy approach was therefore considered to be required in relation to existing buildings compared to new buildings.
- 1.4 It is important to note that existing buildings represent a substantial historic 'investment' in terms of embodied carbon and resources; demolishing and replacing them with new buildings would cause new embodied carbon emissions in producing new construction material, transporting materials to site and assembling them. Efficient reuse of existing buildings also contributes to the efficient use of land, reducing the competition for land against other climate-positive uses such as afforestation or renewable energy generation. Therefore, from a climate perspective (as well as a cultural perspective) it is strongly desirable to instead keep existing buildings in use for longer, while also necessary to improve their operational energy performance to be fit for the net zero carbon future. This necessity is demonstrated as per Anthesis analysis of carbon reduction trajectories towards Warwick and UK carbon commitments [SD7].
- 1.5 Evidence within the Warwick DC Zero Carbon DPD Energy and Sustainability Policy Review (SUB5, page 19) illustrates precedents where other local authorities have implemented policies to support development proposals that result in significant carbon reduction in existing buildings through energy efficiency and low or zero carbon energy generation. Policy NZC4 endorses this approach attributing significant weight to such benefits.
- 1.6 It is reasonable that all developments involving existing buildings demonstrate a consideration toward sustainable construction principles in accordance with Warwick Local Plan Policy CC1 and also consider alternatives to fossil fuel boilers.



- 1.7 With the significant contribution (42.2%) that existing buildings make to the District's overall carbon emissions, it is reasonable, justified and effective to have a policy which seeks to reduce carbon emissions through planning applications involving existing buildings.

2 Question 8.2

Is Policy NZC4 consistent with national policy?

- 2.1 NZC4 provides positive weight to the development of existing buildings where there would be improvements to energy efficiency, a reduction in carbon emissions, or where it improves the general suitability and longevity of existing buildings. The re-use of existing land and buildings is supported in national policy, whilst there is also the expectation that planning policies and decisions will ensure that developments will function well over time and be adaptable to climate change (NPPF Paragraphs 119, 120 and 154). The approach also aligns with NPPF paragraph 124 which confirms planning policies should support efficient use of land, taking into account the availability of land and the desirability of maintaining an area's prevailing character or of promoting regeneration and change.
- 2.2 Policy NZC4 continues to support the aspirations of the Council in tackling and reducing carbon emissions as per WDC's Climate Emergency Action Plan (CEAP) and supports the NPPF's aim to deliver "*radical reductions in greenhouse gas emissions ... in line with the objectives and provisions of the Climate Change Act 2008*" (paragraph 152 and footnote 53). Furthermore, the inclusion of NZC4 also accords with the Council's legal duty to mitigate for climate change as per the Planning and Compulsory Purchase Act 2004 Section 19.
- 2.3 NZC4 also references historic buildings, including listed or locally listed buildings and provides support for retrofitting measures which improve a building's energy efficiency and performance providing that the special characteristics of the heritage assets are conserved in a manner appropriate to their significance. This echoes Section 16 of the NPPF which recognises the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.
- 2.4 Whilst NZC4 provides positive weight to retrofitting in historic buildings, it does not alter the statutory duty under the Planning (Listed Buildings and Conservation Area) Act 1990, or the provision of national planning policies for the historic environment through Chapter 16 of the NPPF.
- 2.5 It is therefore considered that NZC4 is consistent with national planning policy.

3 Question 8.3

Are the impositions on developers set out through Policy NZC4 reasonable and justified?

- 3.1 There is no threshold for NZC4 and such the policy applies to all developments involving existing buildings and requiring planning permission. The same threshold applies to Warwick Local Plan policy CC1, and such the introduction of NZC4 imposes minimal additional information from applicants – i.e. it only asks applicants to assess alternatives to fossil fuel boilers, in addition to those measures in CC1.
- 3.2 As noted above in paragraphs 1.2 - 1.4, there is an urgent need to reduce carbon emissions from existing buildings. It is therefore reasonable and justified to include a policy which applies to all developments involving existing buildings, taking into consideration the crucial role they will need to play in lowering carbon emissions towards locally committed and nationally legislated carbon goals.
- 3.3 To assist developers the DPD at paragraph 10.2 refers to a recommended target of 40kWh/m²/year for average heating energy demand and the detailed guidance provided by the LETI¹ Climate Emergency Retrofit Guide. The Council will also consider supplementary guidance on retrofitting existing buildings to support the implementation of the policy.

¹ *Low Energy Transformation Initiative (formerly London Energy Transformation Initiative).*

4 Question 8.4

Does Policy NZC4 and its requirements have an impact on the delivery of development, including housing?

- 4.1 Policy NZC4 does not have any unacceptable impact on development delivery. The policy requires the consideration of alternatives to fossil fuel boilers. The policy does not set mandatory carbon reduction targets for existing buildings. The policy makes reference to existing detailed guidance on retrofitting existing buildings and a recommended heating energy demand target. The policy provides a positive approach to reducing carbon emissions in existing buildings by explicitly supporting those which offer considerable improvements.