

8<sup>th</sup> March 2023

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Dear Mr McCormack

I thought that the session yesterday afternoon was very productive. I very much liked the way in which you managed the meeting to facilitate a fruitful discussion.

Following the session yesterday I have spent some time today reviewing the documents on the WDC Examination website I refer specifically to **Matter 2 Written Statement**

***WDC NZC DPD Examination Matter 2: Overarching strategy in achieving net zero carbon developments. February 2023.***

***Question 2.1:***

***Are the aims and objectives of the DPD, as submitted, soundly based and do they form an appropriate response to the climate emergency declared in Warwick District?***

My response:

In truth the DPD as submitted is not an appropriate response to the climate emergency declared in Warwick District for the simple reason that the policy does not deliver **truly** net zero carbon buildings. This point was agreed by Ms. Goodyear who gave the example of the Cornwall Council Climate Emergency DPD that used a different methodology to get to truly net zero carbon.

However, we are where we are and I am in agreement that the DPD is an improvement on the 2021 building regulations and should be implanted as soon as possible to improve the energy efficiency of new buildings in the district.

I am pleased to read that Paragraphs 1.8 and 1.9 (copied below) do clarify that the Net Zero Carbon DPD relates to **regulated** energy (1.8) and excludes **un-regulated** energy (1.9)

1.8 The Aims and Objectives as set out in Section 4.1 of DPD are soundly based in this regard and are an appropriate response to the Council's Climate Change Action Programme, and national carbon targets. DPD 4.1 states the

aims are to minimise carbon emissions of new development and to ensure that all new developments should be net zero carbon in operation (clarified as relating to regulated energy).

*4.1 This DPD aims to minimise carbon emissions from new buildings within the District to support the achievement of national and local carbon reduction targets set out in section 1.1 and paragraph 2.5 above. From adoption (and earlier where possible) the DPD will aim to ensure all new developments (as set out on para 5.11) should be net zero carbon in operation. For the purposes of this DPD net zero carbon relates to regulated operational energy, which results from fixed building services and fittings (space heating, cooling, hot water, ventilation and lighting).*

1.9 It is acknowledged that the policies of the DPD do not deliver true net zero carbon development, as for the purposes of the DPD 'net zero carbon in operation' relates to regulated energy and excludes un-regulated energy. WDC considers however that the aims and objectives of the DPD remain an appropriate response to the climate emergency in reducing carbon emissions and delivering improved net zero carbon building standards.

These clarifications are welcomed. However, my recommendation remains that the title of the document is incorrect and misleading

Until I read through the additional documents on the Examination website I had not realized that the title of the document was formerly '**Climate Change and Sustainable Buildings DPD**' as set out in the previous LDS. It is a pity that this title was not retained.

My previous recommendations for a title were:

- Towards Net Zero Regulated Carbon, or
- Transition to Net Zero Regulated Carbon

As an absolute minimum change, I would be comfortable with and strongly recommend the following – basically just including the word '**regulated**' in the title.

- WDC Net Zero Regulated Carbon DPD

I would be happy to attend the session on Friday to state this if required.

Yours sincerely

George Martin