

**Schedule of Additional Modifications to the Published Submission Version of the
Warwick Net Zero Carbon DPD (August 2022)**

Warwick District Council

May 2023

The following format has been used to denote the modifications:

Underlined bold text = new text proposed for policy compared to the submission version

~~Strikethrough text~~ = text proposed for removal compared to the submission version

Underlined text = new text proposed for justification text compared to the submission version.

Such modifications have been set out in the third column of the following table with reasons for the changes set out in the final column.

Schedule of Proposed Additional Modifications

This document comprises a schedule of proposed additional (minor) modifications to the Proposed Submission Net Zero Carbon DPD. Minor changes to the DPD involve rectifying typographical errors and providing factual clarifications to existing wording in the DPD.

These have been brought to the attention of the Council through representations made at the Regulation 19 stage. Additional changes identified through the examination have also been identified and are presented in this schedule also.

Additional Modifications

Modification Number	Submission Plan Reference	Proposed Additional Modification	Reason for Modification
Additional Modifications identified following the Regulation 19 Consultation			
AM01	Page 9 Para 2.6	Given the significant proportion of emissions nationally that stem from buildings, it is a key part of the Government's strategy to improve building standards. As a result, the Government has published its intentions to introduce new Building Regulations during 2022, updating Part L for new homes and non-domestic buildings as a first step towards a Future Homes Standard. The new Building Regulations will require standards that are expected to reduce emissions from new buildings in comparison with current <u>previous 2013</u> standards by 31%.	For factual clarification. The Government introduced Part L 2021 on 15th June 2022 just after the Regulation 19 consultation.
AM02	Page 10 Para 2.7	The Government expects the proposals for a Future Homes Standard to "ensure that an average home will produce at least 75% lower CO2 emissions than one built to current <u>(2013)</u> energy efficiency requirements. In the short term this represents a considerable improvement in the energy efficiency standards for new homes. Homes built under the Future Homes Standard will be 'zero carbon ready', which means that in the longer term, no further retrofit work for energy efficiency will be necessary to enable them to become zero-carbon homes as the electricity grid continues to decarbonise."	For factual clarification. The Government introduced Part L 2021 on 15th June 2022 just after the Regulation 19 consultation. The reference to a 75% reduction in this quote is in relation to previous 2013 building regulations.
AM03	Page 16 Para 4.1.1	This DPD aims to focus on minimising carbon emissions from <u>existing</u> and new buildings within the District to support the achievement of national and local carbon reduction targets.	For factual clarification. The DPD also relates to existing buildings through Policy NZC4.
AM04	Page 20 Figure 1	Stage 2: Zero and Low Carbon Energy Sources and Technologies <u>NZC2(B)</u> NC2(B)	To correct the reference from NC2(B) to NZC2(B)

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AM05	Page 20 Figure 1	Amend final text box to state 'Operational Net Zero (<u>Regulated Energy</u>)'	For factual clarification that the DPD relates to regulated operational energy and associated carbon emissions.
AM06	Page 35 Para 10.2	For existing buildings an average heating energy demand of 40kWh/m² <u>40kWh/m/yr</u> should be used as a target for proposals involving alterations, extensions and changes of use. Detailed guidance for existing buildings is provided by LETI's Climate Emergency Retrofit Guide ⁸ . 8 https://www.leti.london/retrofit	To correct that the units for heating energy demand should be expressed as kWh/m/yr.
AM07	Page 42 Glossary	Add definition of Unregulated Carbon Emissions. <u>Unregulated Carbon Emissions: Unregulated carbon emissions result from the building energy consumption from process and systems that are not 'controlled' by Building Regulations. For example, this could include energy consumption from sources such as IT equipment, lifts, external lighting, cooking, audio-visual equipment and other appliances.</u>	To assist with clarification that the DPD relates to regulated operational energy and associated carbon emissions.
AM08	Page 40 Glossary	Add definition of Operational Energy. <u>Operational energy: Operational energy comprises regulated and unregulated energy consumption. The regulated energy is building energy consumption resulting from the specification of controlled, fixed building services and fittings, including space heating and cooling, hot water, and ventilation while the unregulated energy is the energy consumption that is not controlled by Building Regulations, including but not limited to, energy consumption from IT equipment, lifts, and appliances.</u>	To assist with clarification that the DPD relates to regulated operational energy and associated carbon emissions.
Additional Modifications identified during the Examination			
AM09	Page 23 Policy NZC2(A)	New development of one or more new dwellings (C3 or C4 use) are expected to demonstrate a 10% improvement on the Part L 2021 Target for Fabric Energy Efficiency (set by SAP10.2).	For factual clarification and to allow for future updates to SAP.
AM10	Page 23 Para 6.3	To demonstrate compliance with policy NZC2(A), calculations should be performed using the latest version of the SAP 10.2 methodology. (current version 20.08.2021). Government has confirmed that this	For factual clarification and to allow for future updates to SAP.

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		calculation will become the statutory methodology by June 2022 along with the interim uplift to Part L.	
AM11	Page 26 NZC2(B)	New development of one or more new dwellings (C3 or C4 use class) and/or 1,000sqm or more of new non-residential floorspace, hotels (C1 use class), or residential institutions (C2 use class) should demonstrate through an energy statement that additional renewable, zero and low carbon energy technologies have been provided on-site* to achieve the carbon reductions required by Policy NZC1 and achieve on-site net zero operational carbon wherever possible.	For clarification.
AM12	Page 30 Para 8.6	This average cost of carbon savings delivered by the fund will consider the cost of fund administration, project identification and setup, and insurance against failure/reversal of delivered projects. <u>A range of projects are being considered</u> Projects are yet to be formalised by Warwick District Council but that will deliver carbon-saving interventions that would otherwise not be deliverable with other available funds. Projects could include but are not limited to: renewable energy generation; energy retrofitting in existing buildings; large scale tree planting. Projects will be delivered within Warwick District wherever possible but could include neighbouring authorities elsewhere in Warwickshire and Coventry and cross-border initiatives where there is a benefit to doing so (e.g. deliverability; economies of scale; social benefits). The same localism principles will be required in any alternative offsetting solution proposed by developers, whereby the Council will seek that the offsetting solution is delivered within Warwick District and/or delivers benefits to the district and must contribute to securing a net zero carbon future for Warwick District.	For clarification.
AM13	Page 11 Para 2.11	Remove identified text from paragraph 2.11. In declaring a climate emergency, WDC has committed to “facilitating decarbonisation by local businesses, other organisations and residents so that total carbon emissions within Warwick District are as close to zero as possible by 2030.” The Council is therefore committed to introducing standards which enable net-zero carbon buildings as soon as possible. Recognising the Government’s position that “local planning authorities will retain powers to set local energy efficiency standards for new homes”, Warwick District Council is committed to bringing forward policies ahead of the Government’s stated timetable for the Future	Not relevant as adopted Local Plan policies are being enhanced and supported by the DPD policies and not superseded or replaced.

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		Homes Standard, whilst ensuring the approach we take broadly aligns with the approach set out in the Government's outline proposals. This DPD provides the building standards policies to achieve this and (except where policies within the existing Local Plan are replaced by the DPD) , these policies supplement those within the adopted Warwick District Local Plan, 2011 – 2029 (See Section 11). The policies will be incorporated and built on in the preparation of the emerging South Warwickshire Local Plan.	
AM14	Page 18 Policy NZC1(iii)	Remove identified text from sub para iii of the policy. iii. Compliance with the energy efficiency and renewable energy provisions set by policies (policy) NZC2(A) & (B) and by presenting the carbon savings achieved across each step of the energy hierarchy (demand reduction, efficient supply, renewable and other low carbon technology).	The text identified for removal is a typographical error.
AM15	Page 21 Para 5.9	Furthermore, to ensure the energy performance gap is minimised we recommend the use of a recognised quality assurance process that ensures the 'as built' performance (energy use, carbon emissions, indoor air quality, and overheating risk) matches the calculated design performance of buildings. Examples of these include BEPIT (Building Energy Performance Improvement Toolkit), the Passivhaus accreditation process and the Assured Performance Process (<u>National Energy Foundation NEF / Good Homes Alliance GHA</u>).	For clarification.
AM16	Page 37 Para 12.2	Remove identified text from the paragraph. The 2008 Sustainable Buildings SPD is also superseded.	For clarification. Unnecessary text.
AM17	Page 48	Remove '4.30' from the last entry on the page. 4.30 Details of the Council's CEAP are available here	For clarification. Unnecessary and unrelated reference.