



# Warwick District Council Net Zero Carbon DPD Main Modifications Consultation Report

Warwick District

Prepared for: Warwick District Council

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# 1 Introduction

- 1.1 This Consultation Statement compiles all public responses to Warwick District Council's (WDC) Main Modifications Consultation on the Warwick District Net Zero Carbon Development Plan Document (NZC DPD).
- 1.2 The consultation ran from Monday 5<sup>th</sup> June 2023 to Monday 17<sup>th</sup> July 2023 – totalling a period of six (6) weeks.
- 1.3 The consultation documents along with all the relevant information about the consultation process was made available online and can be viewed using the following weblink: [https://www.warwickdc.gov.uk/info/20799/development\\_plan\\_documents/1713/net\\_zero\\_carbon\\_development\\_plan\\_document/2](https://www.warwickdc.gov.uk/info/20799/development_plan_documents/1713/net_zero_carbon_development_plan_document/2)
- 1.4 The following consultation documents were made available on the Council's website:
  - Final Schedule of Proposed Main Modifications to the Submission Net Zero Carbon DPD (EXAM18)
  - SA/HRA Addendum updates for proposed main modifications (EXAM 20)
- 1.5 Although not part of the consultation, the following documents were also published for reference purposes only:
  - Final Schedule of Additional Modifications (Minor Changes) to the Submission Net Zero Carbon DPD (EXAM 19)
  - Track Change version of the Net Zero Carbon DPD showing all proposed (Main and Additional Modifications (EXAM 21)
- 1.6 Printed copies of the consultation documents were also made available at the “deposit points” identified in the Council's Statement of Community Involvement (SCI).
- 1.7 All the consultees on the Council's planning policy consultation database who responded to previous consultations on the NZC DPD, and those wanting all Warwick Planning Policy updates were sent a notification via email and by post.
- 1.8 The consultation was also advertised in the Leamington Observer and on the Council's social media channels. Public notices were displayed in libraries and other deposit points as mentioned in the Warwick SCI.
- 1.9 Consultation comments could be made using the online consultation portal (Opus consult), via email to the planning policy team or in writing to the planning policy team at Warwick District Council's offices.

- 1.10 The consultation was carried out in accordance with the Council's Adopted SCI which was updated in 2020.
- 1.11 The consultation sought views only on the Main Modifications to the DPD recommended by the Planning Inspector. The proposed Main Modifications are numbered PMM01 – PMM20, representing 20 separate modifications.
- 1.12 The scope of the consultation was to scrutinise the Main Modifications, ensuring that they comply with legal requirements and can be considered to be sound.
- 1.13 Supplementary to the Main Modifications are the Additional Modifications, identified by the Council to make the plan clearer and easier to understand, or to correct any factual errors. These were not subject to consultation.
- 1.14 All responses to the Main Modifications consultation are included in the table below and it is noted where they are a specific comment on the Main Modifications using the references PMM01 – PMM20.

## 2 Representations summary

2.1 The Main Modifications consultation received responses from 14 separate respondents.

2.2 These respondents (in alphabetical order) comprise:

1. Dr Guy Barker
2. The Coal Authority
3. Anna Corser
4. Historic England
5. Kenilworth Town Council
6. Mr George Martin
7. Natural England
8. Mr Gary Stocker
9. Mr William Tansey
10. Savills, on behalf of Barratt David Wilson Homes (Mercia)
11. Stantec UK Limited, on behalf of IM Land
12. Warwick District Council
13. Warwick Town Council
14. Warwickshire County Council

2.3 The full wording of each representation along with a brief response is included within Section 3 below.

### 3 Consultation Representations

3.1 This section considers the representations submitted in response to the Main Modifications consultation. Where comments were submitted in relation to a specific Main Modification this is identified in the table under the column entitled ‘Main Modification Ref’. Where this was not provided or could not be ascertained this has been marked ‘N/A’. The table includes the representations submitted in full and alongside a brief response has been provided on behalf of the Council.

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
85807	Mr William Tansey	PMM11	This would have the effect of lowering the standards required of new buildings to meet a lower bar which is easily more practically applied to older buildings requiring retrofit. It would not encourage the fast development of low cost building strategies by developers. The 2 should be dealt with as separate issues and legal challenges to new legislation for new buildings should be easy to defend with separate, practical standards for retrofit worthy buildings.	PMM11 relates to a minor alteration of Objective 2 to include reference to existing buildings and clarify that the DPD also includes standards that can be applied to existing buildings in Policy NZC4. PMM11 does not lower the standards required of new buildings and through Policy NZC4 a separate policy approach is applied to existing buildings as suggested by this representation. The Council does not consider the comment raises any issues of soundness or legal compliance.
85808	Mr William Tansey	PMM09	It seems sensible to require that future homes will not need retrofiting soon after they are built. I appreciate that it will not be possible to build a completely carbon neutral building in any development project of scale at he moment [ <i>sic</i> ], but the industry has a long way to go in that respect so this standard (lesser than the shorter version it replaces) should be held as a minimum requirement without the potential for negotiation that the proposed amendment suggests.	Comment noted. The Council does not consider the comment raises any issues of soundness or legal compliance.
85809	Mr William Tansey	PMM10	The use of the term 'regulated carbon' suggests a preference for carbon offsetting. This practice is essentially a greenwash and allows trading the carbon footprint generated and just shifts the problem elsewhere rather than aiming to minimize carbon production.	PMM10 is a factual clarification that the DPD relates to regulated operational energy and associated carbon emissions. It does not suggest a preference for carbon offsetting. The Council does not

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
				consider the comment raises any issues of soundness or legal compliance.
85810	Mr William Tansey	PMM16	If the are 2 policies [sic] and the newer does not replace the old, will there be room for dispute if application of the later standard is questioned in favour of the older (preumable lower [sic]) standard?	PMM16 clarifies that the NZC DPD policies expand those in the adopted Local Plan. Both the adopted Local Plan and NZC DPD policies will need to be considered and applied to development proposals on adoption of the NZC DPD. The Council does not consider the comment raises any issues of soundness or legal compliance.
85811	Mr William Tansey	PMM08	If the intent is to remove paragraph 1.3 from the DPD entirely then I object. It is necessary to include stringent and clear challenges to future developers in order to ensure compliance, or where necessary to hold them to account for failure. In order to make retrofitting technologies economically attractive their price has to be low and sustainable. This is most likely to be achieved by generating a surplus of such technologies destined for the new-build market (whose developers will instinctively seek to down development costs). It may be unpalatable, rather than illegal. Re-word it perhaps?	PMM08 relates to the removal of the objective from this section of the DPD, as the objective was duplicated at 4.1.1, and its duplication is not required in this location. The Council does not consider the comment raises any issues of soundness or legal compliance.
85812	Mr William Tansey	PMM12	Again, this puts a presumption in favour of carbon trading rather than carbon neutrality. The previous wording was probably better.	PMM12 is a factual clarification that the DPD relates to regulated operational energy and associated carbon emissions. The Council does not consider the comment raises any issues of soundness or legal compliance.
85813	Mr William Tansey	PMM14	removed vagueness and room for easy challenge.	Comment noted.
85814	Mr William Tansey	PMM19	Should include funding of retrofit technologies of older buildings and not just traditional carbon offset projects like tree planting.	Comment noted. PMM19 does not specify the type of offsetting projects to be funded. PMM04 identifies that nature-based solutions are the Council's preferred carbon offsetting mechanism in the first instance but

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				also that other offsetting mechanisms may also be developed in the future. The Council does not consider the comment raises any issues of soundness or legal compliance.
85815	Mr William Tansey	PMM20	Should be included in the DPD to carry weight of enforcement.	Comment noted.
85816	Mr William Tansey	PMM07	support the sensitive retrofitting of renewables in listed buildings....an important piece of legal clarity.	Comment noted.
85817	Mr George Martin	N/A	<p><b>Foreword</b></p> <p>I have been a resident of Warwick District for 40 years and am currently Chair of the UK's Building Performance Network. My relevant working experience is as follows:</p> <p>Previous:</p> <ul style="list-style-type: none"> <li>• Director of Environment – Tarmac Construction</li> <li>• Director of Business Affairs at the UK's Leading Sustainable Development Charity, Forum for the Future.</li> <li>• Director of Sustainability - Building Research Establishment (BRE)</li> <li>• Director of Sustainable Development - Willmott Dixon</li> <li>• Professor of Low Impact and Sustainable Buildings – Coventry University</li> <li>• Member of the Overseeing Panel of The Warwick People's Inquiry on Climate Change</li> </ul> <p>Current:</p> <ul style="list-style-type: none"> <li>• Chair, Sustainable Development Foundation</li> <li>• Executive Chair – Building Performance Network.</li> <li>• Board Member Good Homes Alliance.</li> </ul> <p>When at BRE I was a member of the team that developed the Code for Sustainable Homes and the Zero Carbon Target for new homes from 2016.</p>	Comment noted.



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			<p>I was formerly a member of the Government’s Zero Carbon Task Force established to advise on how England could achieve the ambition for new school buildings to be zero carbon by 2016.</p> <p>I am a member of the Kenilworth All-together Greener Group (KATG) and helped develop the response that KATG made as part of the contribution to the Kenilworth Neighbourhood Plan.</p> <p>Currently as Chair of the Building Performance Network I was the project manager for the new Building Performance Evaluation, British Standard (BS 40101) published in January 2022. This BS is for all new and retrofitted buildings.</p>	
85818	Mr George Martin	N/A	<p>Introduction</p> <p>On the basis that we are where we are with this DPD, most of the changes proposed by the Examiner are appropriate. There are some that I highlight that should still be made to further improve the document. What I really do not understand is why the title has not been amended. All through the document where net zero carbon has been mentioned this has been changed to Net Zero REGULATED carbon. So why not change the title. This is the minimum change to the title that I believe should (MUST!) be made. Nationally agreed definitions will hopefully be agreed later this year.</p> <p>My suggestions for a new title were:</p> <ul style="list-style-type: none"> <li>• Net zero regulated carbon DPD</li> <li>• Towards net zero regulated carbon DPD</li> <li>• WDC Climate Emergency DPD</li> </ul> <p>The latter matches what Cornwall Council have done which has been titled – ‘Cornwall Council Climate Emergency DPD’.</p>	The comment is not a specific response to any of the Main Modifications. The title of the DPD was discussed at the Examination hearings. The Council consider the title of the DPD adequately describes the subject matter of the DPD and does not consider the comment raises any issues of soundness or legal compliance.
85819	Mr George Martin	N/A	My review of the document:	The comment is not a specific response to any of the Main Modifications. The title of the DPD

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			<p>Title – no change has been proposed. If I had just one recommendation to make it is to change the title. My minimum proposal is to make the title:</p> <p style="text-align: center;">Net Zero Regulated Carbon DPD.</p>	was discussed at the Examination hearings. The Council consider the title of the DPD adequately describes the subject matter of the DPD and does not consider the comment raises any issues of soundness or legal compliance.
85820	Mr George Martin	PMM08	Deleting 1.3 Objective of DPD. I agree	Support noted.
85821	Mr George Martin	N/A	2. National context. I agree with the additions.	Support noted. The comment relates to Additional Modifications.
85822	Mr George Martin	PMM16	3. The Planning Context. Main Modification PMM16. I agree	Support noted.
85823	Mr George Martin	PMM17	Main Modification PMM 17 I agree	Support noted.
85824	Mr George Martin	PMM18	Main Modification PMM18 I agree	Support noted.
85825	Mr George Martin	PMM09	<p>4. Aims and objectives Main Modification PMM09. I do not agree with this. The statement quote “By bringing forward standards equivalent to the Future Homes Standard (two years in advance of its national introduction) ..... “ The fact is that the Future Homes Standard has not yet been approved. The hope – well the possibility is that the Future Homes Standards will in fact be better than this DPD. The talk is that SAP 10.2 is being significantly revised and will be termed SAP 11. At that point it will be closer to PHPP which is the Passivhaus methodology.</p> <p>Main Modification PMM09 states quote:</p> <p style="text-align: center;">...By bringing forward performance standards equivalent to the Future Homes Standard (two years in advance of its national introduction) new homes should not need future retrofit.....”</p> <p>This will only be the case if fossil fuels i.e. gas, is banned otherwise expensive retrofit will be required.</p>	<p>The comment is noted. PMM09 provides factual clarification that the DPD relates to regulated operational energy and does not include unregulated energy and associated emissions. The DPD will ensure that the contribution to the District’s carbon deficit is minimised.</p> <p>It is correct that the final Future Homes Standard has not yet been approved. The DPD does not require the Future Homes Standard.</p> <p>For new dwellings Policy NZC1 sets a minimum 63% reduction of carbon emissions based on Building Regulations Part L 2021. This % reduction aligns with the Government’s Future Homes</p>

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			<p>There is a possibility that the electricity grid will not be able to support all new homes to be on heat pumps and gas may have to be installed. Developers will of course jump at this opportunity.</p> <p>I seriously do not think we should be looking at the creation of woodland for offsetting. Additional renewable energy and retrofit of other buildings fine....but NOT woodland.</p> <p>One point about additional renewable energy and retrofit of other buildings of site .....this will not help the occupants of the new homes in terms of cost of living.</p> <p>Also – if this really is net zero carbon, why is this offsetting necessary?</p>	<p>Standard set to come into force in 2025, at the time of drafting the DPD.</p> <p>It is set out at paragraph 7.3 of the DPD that the Council is expecting that energy sources avoid fossil fuels in their entirety.</p> <p>Additional comments relating to the electricity grid, offsetting are noted. In accordance with the energy hierarchy, Policy NZC1 is clear that offsetting will only be considered an acceptable solution to net zero carbon requirements if it can be demonstrated that carbon reductions achieved via on-site measures (and near-site renewables) are demonstrably unfeasible or unviable. PMM04 identifies that Warwick District Council intend to utilise nature-based solutions through the WESTP as its preferred carbon offsetting mechanism in the first instance. Other offsetting mechanisms may also be developed in the future.</p> <p>The Council does not consider the comments raises any issues of soundness or legal compliance.</p>
85826	Mr George Martin	PMM10	<p>Main Modification PMM10. Good that the clause now states net zero REGULATED carbon.</p> <p>If good enough to add the word REGULATED into clause 4.2.1 why not include in the overall title?</p>	Support for PMM10 noted.
85827	Mr George Martin	PMM11	<p>Main Modification PMM 11. I agree with the addition of the words “and existing”</p>	Support noted

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85828	Mr George Martin	N/A	However, there must be a definition of what a “robust carbon offsetting policy” is, as part of clause 4.2.4 as Developers will run rings around this.	The comment is not a specific response to any of the Main Modifications.
85829	Mr George Martin	N/A	5. Overarching Strategy – Achieving Net Zero Carbon Development.  Main Modification policy NZC1. Just a typo change.	Comment noted. The comment relates to Additional Modifications.
85830	Mr George Martin	PMM12	Main Modification PMM12. I agree with this change.	Support noted.
85831	Mr George Martin	PMM13	Main Modification PMM13. I agree with the changes. Basically making it clear that this is for REGULATED energy.	Support noted.
85832	Mr George Martin	PMM01	Main Modification PPM01. This is a new clause to add – 5.12. This probably needs to go unchanged – I do not personally support ..“financial contributions towards a carbon offsetting policy’	Comment noted. The Council does not consider the comment raises any issues of soundness or legal compliance.
85833	Mr George Martin	N/A	Index [6]: It should be noted that the comment made quote “FHS being a 63.8% reduction on Part L 2021” may not be correct as the FHS has not been finalised. In addition the DPD uses SAP 10.2. The FHS will probably use SAP 11 which will be far closes to PHPP the Passivhaus way of assessment.	The comment is not a specific response to any of the Main Modifications. The comment relates to footnote 6. The Council does not consider the comment raises any issues of soundness or legal compliance.
85834	Mr George Martin	N/A	6. Reducing Energy Demands: Energy Efficient Buildings. Main Modification Policy NZC2(A). I approve of the change. Interesting that the change is to remove mention of SAP 10.2 and instead having it read as Quote: “using the latest version of SAP” and not specifically SAP 10.2. The sensible change should be made throughout the document.	Support noted. The comment relates to Additional Modifications.
85835	Mr George Martin	PMM02	Main Modification PMM02. I approve of this addition.	Support noted.
85836	Mr George Martin	PMM14	7. Energy sources	Support noted.

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			Main Modification Policy NZC2(B): Zero or Low Carbon Energy Sources and Zero Carbon Ready Technology. PMM14. I approve this. This is again about adding in the word REGULATED in front of operational carbon.	
85837	Mr George Martin	N/A	Also removed are the words “where possible” which is good.	Support noted. The comment relates to Additional Modifications.
85838	Mr George Martin	N/A	One change I would like to see – but unlikely is clause 7.4. This gives the Developer the option to offset under NZC2(C) where renewable energy is not possible on site and where there are grid constraints. Developers are going to run rings around this.  Offsetting should only be allowed for flats and non-residential buildings but NOT for low rise housing.	The comment is not a specific response to any of the Main Modifications. The Council does not consider the comment raises any issues of soundness or legal compliance.
85839	Mr George Martin	PMM03	Main Modification PMM03. I approve of this addition.	Support noted.
85840	Mr George Martin	N/A	8. Carbon Offsetting.  Policy NZC2(C) – I approve of the changes.	Support noted.
85841	Mr George Martin	PMM04	Main Modification PMM04. I approve of this change.	Support noted.
85842	Mr George Martin	PMM19	Main Modification PMM 19. I approve of this addition	Support noted.
85843	Mr George Martin	PMM05	Main Modification PMM 05. I approve of this addition	Support noted.
85844	Mr George Martin	N/A	9. Embodied Carbon Policy NZC3: Embodied Carbon – I cannot see any changes proposed here.	Comment noted. No changes are proposed to the wording of Policy NZC3
85845	Mr George Martin	PMM20	Main Modification PMM20. I approve the change and additions.	Support noted.
85846	Mr George Martin	PMM06	Main Modification PMM 06. I approve of this addition.	Support noted.

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
85847	Mr George Martin	PMM07	10. Existing Buildings Policy NZC4: Existing Buildings I approve the change.	Support noted.
85848	Mr George Martin	N/A	An important point. There is a statement in the policy quote: <i>"In addition, all developments should consider alternatives to conventional fossil fuel boilers"</i>  The DPD MUST ban fossil fuel boilers if it is to get anywhere near to net zero regulated carbon [sic]. Having a fossil fuel boiler means that future retrofit will be required. This goes against one of the objectives.	The comment is not a specific response to any of the Main Modifications.  Policy NZC4 is consistent with the Objectives of the DPD at Section 4 as modified, notably Objective 2.  The Council does not consider the comment raises any issues of soundness or legal compliance.
85849	Mr George Martin	PMM07	Main Modification PMM 07. This 10.3 clause needs to be stronger. It should say that fossil fuel boilers are not allowed.	Comment noted. PMM07 clarifies how the DPD policy NZC4 relates to existing Local Plan policy. The Council does not consider the comment raises any issues of soundness or legal compliance.
85850	Mr George Martin	N/A	11. Viability. No changes proposed.	Comment noted. No changes are proposed to the wording of Section 11 Viability.
85851	Mr George Martin	PMM15	12. Warwick District Plan 2011 – 2019 Policies superseded or amended by this DPD Main Modification PMM 15. I approve the addition of the one word and deletion of one word.	Support noted.
85852	Mr George Martin	N/A	Glossary  I approve of the addition of a definition of both Operational Energy [sic] and Unregulated Energy.  There is still no definition for the 'Performance Gap'. I would recommend that reference to BS 40101 the Building Performance evaluation British Standard.	The comment is not a specific response to any of the Main Modifications.  The comments relate to Additional Modifications.  The Council does not consider the comment raises any issues of soundness or legal compliance.

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			<p>The definition for Net Zero Carbon makes no sense in the context of this DPD. It states quote:</p> <p><i>“Net zero refers to achieving a balance between the amount of greenhouse gas emissions produced and the amount removed from the atmosphere.”</i></p> <p>Will this make any sense to a developer, occupiers, Councillors? I do not think so.</p>	
85853	Mr George Martin	N/A	Appendix1 Policy Context. No changes proposed.	Comment noted. No changes are proposed to the wording of Appendix 1 .
85854	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM04; PMM05; PMM09; PMM12; PMM13; PMM14; PMM16; PMM17; PMM18; PMM19	<p>Savills has prepared the following submission on behalf of Barratt David Wilson Homes (Mercia), referred to hereafter as “BDWH”, in response to the emerging Warwick Zero Carbon DPD Main Modifications Consultation.</p> <p>Background</p> <p>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.</p> <p>Barratt Developments has an extensive commitment to sustainable housebuilding and has been nationally recognised for its commitment in this area by: the FTSE 100 Responsibility Index; the next Generation Sustainability Benchmark Report; and the Carbon Disclosure Project, which recently awarded it an ‘A’ rating, demonstrating that it is one of the leading companies worldwide for the action that it is taking.</p> <p>BDWH considers that each of the following Proposed Main Modifications (PMMs) do not go far enough to address the</p>	Objection noted. See Council response below to each comment on the respective PMMs.

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			challenges involved in the implementation of, or provide sufficient justification for, introducing both the Future Homes Standard two years early and other enhanced planning policy requirements: PMM04; PMM05; PMM09; PMM12, PMM13; PMM14; PMM16; PMM17; PMM18; PMM19; and PMM20. This submission sets out the rationale for this by commenting on each of these PMMs in turn.	
85855	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM04	<p>BDWH notes that the proposed modification to paragraph 8.7 states that: "...<i>Warwick District Council intend to utilise nature based solutions through the WESTP as its preferred carbon offsetting mechanism in the first instance...</i>"</p> <p>BDWH raised concerns through the Examination process that a carbon offsetting fund had not been set up and that there is: no explanation as to how this approach would meet the requirements for planning obligations; and no clarity on how or when the fund would be set up. The Warwick District Council (WDC) response to Matter 6 of the Inspector's Matters Issues and Questions, confirmed that the Warwickshire Ecosystem Trading Protocol (WESTP) is yet to be consulted upon and proposed that consultation would commence in April 2023.</p> <p>BDWH is not aware of, and has not been made aware of as a participant in the Zero Carbon DPD examination process, any consultation having as yet taken place on the WESTP. BDWH is also unaware of consultation having taken place as yet on a refreshed Warwickshire, Coventry and Solihull Green Infrastructure Strategy (WCSGIS), which is understood to be including the WESTP as an appendix.</p> <p>Whilst PMM04 includes a short summary of what WESTP is proposed to cover, BDWH considers that in order to make the provisions set out in the proposed Carbon Offsetting Policy NZC2(C) sound, the PMMs should be making reference to an actual mechanism that is either already in place or at least a mechanism for which details are clearly available for how it is intended to operate.</p>	<p>Objection noted.</p> <p>PMM04 outlines and provides clarification on measures that Warwickshire County Council has taken and put in place in creating a carbon market for Warwickshire and which will be the preferred carbon offsetting mechanism on adoption of the DPD.</p> <p>Warwickshire County Council advise that the WCS Green Infrastructure Strategy and the WESTP is expected to be consulted upon in August/September 2023.</p> <p>The Comment makes reference to the forthcoming Supplementary Planning Document (SPD) and the Council can confirm consultation on this SPD is due to commence in September 2023.</p> <p>As the comment identifies it also includes a number of comments about the approach to offsetting which were raised during the examination process which may be summarised as:</p>



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			<p>BDWH also wishes to highlight that PMM04 does not provide a clear link between the proposed use of WESTP and the impact of the cost of offsetting measures on the viability of development proposals (either on allocations or windfall sites) which are being brought forward against the policies of existing adopted Warwick District Local Plan. In addition PMM04 does not provide any further clarity on how the proposed carbon offsetting price of £254 / tonne would work in practice and how this would impact on the viability or deliverability of new development. There is therefore still a need for further evidence base justification to be made available in relation to this approach.</p> <p>As it currently stands there is still no certainty on: how the carbon offsetting approach in proposed Policy NZC2(C) will work; what schemes will be funded; whether the approach will be viable; when the fund will be operational; and what measures might be in place in the intervening period. It is noted that WDC is producing a Supplementary Planning Document which may include further information in relation to this matter, but a draft of this document is also not currently available.</p> <p>This general lack of clarity and certainty will cause an issue with the effectiveness and implementation of the proposed Policy provisions and will disrupt the delivery of new development through the planning application process. BDWH considers that until such further information is available for review and consultation Policy NZC2(C) remains insufficiently justified. PMM04 does not go far enough to address this position and this should be resolved before the DPD is adopted.</p>	<p>When a carbon offsetting fund would be set up;                      How the approach would meet the requirements for planning obligations;                      What schemes will be funded;                      The impact of offsetting on development viability;</p> <p>The Council considers that these comments were considered during the examination hearings and do not raise any issues of soundness or legal compliance.</p>
85856	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM05	BDWH notes that this PMM introduces new wording at paragraph 8.10 which explains that the proposed carbon offsetting approach links to existing Warwick District Local Plan policies DM1 and DM2 with regard to financial contributions and assessment of the viability of development. BDWH considers that the identification of specific existing	<p>Comment in relation to PMM05 and paragraph 8.10 noted.</p> <p>In relation to comments on the wider issues of viability, the Council considers that these comments were</p>

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			<p>adopted policies is helpful, as is the clarification given that the proposed offsetting funds that would be secured through this process will be ring-fenced. However this PMM is considered to insufficiently address the wider issue of viability in the context of Local Plan-making.</p> <p>As set out within representations submitted to previous consultation stages for this DPD, factors which should be addressed in relation to viability include: the submitted Viability Study not taking into consideration the viability of sites greater than 300 units, which quite often have their own challenges regarding additional strategic infrastructure costs; the rationale for the figures used in relation to build cost inflation, which Savills considers is not evidence based and should be substantially higher; and the fact that the submitted Viability Study proposes that viability conflicts arising from bringing in the proposed NZC DPD policies could be resolved through a reduction in affordable housing, without consideration being given to the potential disbenefits from reducing affordable housing and the economic and social implications that might arise as a result.</p> <p>To ensure the DPD is suitably justified, PMM05 and the approach taken through the other PMMs, should give clear regard to the viability implications of the proposed DPD Policies in order to demonstrate that the proposed DPD Policies are sound.</p>	<p>considered during the examination hearings and do not raise any issues of soundness or legal compliance.</p>
85857	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM09	<p>BDWH notes that the PMMs to paragraph 4.1.2 state that “By bringing forward performance standards equivalent to the Future Homes Standard (two years in advance of its national introduction) the new homes should not need future retrofit, and by collecting carbon offset payments the DPD will raise funds to deliver other vital but currently underfunded actions...”. BDWH supports the transition to a low / zero carbon future and is following its own Zero Carbon Home Roadmap. BDWH, in common with the development industry as a whole is also gearing up for the national implementation of the Future Homes Standard in 2025.</p>	<p>Comment noted.</p> <p>PMM09 is proposed for factual clarification that the DPD relates to regulated operational energy and does not include unregulated energy and associated emissions. The DPD will ensure that the contribution to the District’s carbon deficit is minimised.</p>

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			<p>BDWH nevertheless wishes to highlight that this PMM does not address the concerns expressed by the development industry through the DPD consultation process on the implications of the intention to accelerate the implementation of the Future Homes Standard to new development in Warwick District by two years. These concerns arise from the significant increase in complexity which will result from the introduction of this policy approach. This complexity will not only affect developers, but will also affect consultants, architects, designers, suppliers and trades, who all rely on a set of clear and consistent standards to which they can refer and be confident in.</p> <p>In this regard it should be noted that the 'Ready for Zero' Report<sup>1</sup> identifies: how the industry still needs upskilling (in the form of design, installation, set-up and commissioning) which needs to be planned, progressively rolled out and monitored; that suitable technological Design Standards need to be developed and published; there is still a need for training and information for consumers; and that the industry needs rapid and significant supply chain development. In order to achieve this the 'Ready for Zero' Report emphasises that the careful design of transitional arrangements is key.</p> <p>BDWH wishes to reiterate that it takes time to get the measures in place and for the necessary technology to be tested and be made available at a reasonable cost to enable the Future Homes Standard approach to be applied on a large scale / national basis. There is therefore a risk that rushing this process could lead to: a reduction in housing delivery (including in relation to affordable housing); harm to economic growth; and a reduction in the number of jobs created. A significant slowdown in the delivery of new homes at a time when housing delivery is greatly needed would not be a positive outcome. The PMM does not address these fundamental concerns.</p>	<p>BDWH support for the transition to a low / zero carbon future and also gearing up for the national implementation of the Future Homes Standard in 2025 is noted.</p> <p>The Council note BDWH concerns relating to the implementation of the Future Homes Standard in Warwick District ahead of national implementation.</p> <p>The Council considers that these comments were considered during the examination hearings and do not raise any issues of soundness or legal compliance.</p>

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			1 Future Homes Hub Task Group Report (28 February 2023). Ready for Zero: Evidence to inform the 2025 Future Homes Standard.	
85858	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM12	BDWH notes that the PMMs to paragraphs 5.2 and 5.6 to clarify that the provisions relate to regulated operational energy and regulated energy respectively and welcomes this change. This change is necessary to improve the effectiveness of the proposed approach. However in relation to the change to paragraph 5.6 (part 3: carbon offsetting) it is not considered that the PMM goes far enough to make the approach to implementing carbon offsetting sound, as explained further in the BDWH response to PMM04.	Support for PMM12 noted in relation to clarification that the provisions relate to regulated operational energy.
85859	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM13	BDWH notes that the PMMs to paragraphs 5.2 and 5.6 to clarify that the provisions relate to regulated operational energy and regulated energy respectively and welcomes this change. This change is necessary to improve the effectiveness of the proposed approach. However in relation to the change to paragraph 5.6 (part 3: carbon offsetting) it is not considered that the PMM goes far enough to make the approach to implementing carbon offsetting sound, as explained further in the BDWH response to PMM04.	Support for PMM13 noted in relation to clarification that the provisions relate to regulated operational energy.  See Council response to Savills on behalf of Barratt David Wilson Homes (Mercia) in relation to PMM04
85860	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM14	In common with the response given to PMM12 & PMM13 BDWH notes that the proposed modifications to proposed Policy NZC2(B) clarify that the provisions relate to regulated operational carbon and welcomes this change. This change is necessary to improve the effectiveness of the proposed approach. However it is not considered that the PMM goes far enough to sufficiently explain what details need to be included within the Energy Statement which is a requirement of this particular proposed Policy.  As explained further in response to PMM18, BDWH and other parties have raised concerns through the DPD consultation process about the uncertainty that arises from leaving too much detail to SPDs. Draft Policies NZC1 and NZC2(B) are clear in specifying which development proposals the proposed energy statement should be submitted to support and that the proposed Energy Statement should demonstrate the	Support for PMM13 noted in relation to clarification that the provisions relate to regulated operational energy. BDWH concerns relating to what details need to be included in an Energy Statement are noted.  The Council is in the process of drafting SPD on this matter, the scope of which has already been presented as part of the Examination Hearings (EXAM 16).  The Council expect the draft SPD will be subject to consultation commencing in September 2023 and

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			<p>application of the energy hierarchy through showing how the requirements set out in Draft Policies NZC2 (A), (B) &amp; (C) are met, where appropriate.</p> <p>BDWH nevertheless remains concerned that this proposed DPD policy would not be effective without further clarity on what the required Energy Statements need to include, which in turn would currently impact on the ability to implement the proposed DPD Policies, as drafted, upon adoption. This will be a particular issue in the intervening period between when the DPD is adopted and when a subsequent SPD is adopted. This includes providing more clarity on how the content of Energy Statements should reflect each type of planning application. The level of detail (e.g. final number, type, mix, design and layout of dwellings) that can be provided at the outline stage is very different to that which can be provided at reserved matters stage.</p> <p>It is also currently unclear whether the level of detail included within an SPD might have an impact on scheme viability and deliverability, notably in the context of WDC's proposal to implement the Future Home Standards ahead of the national 2025 implementation date. PMM14, in deferring all detail to a future SPD, does not go far enough to address this position and this should be resolved through the inclusion of, and consultation on, more details within the supporting text for the proposed policies before the DPD is adopted.</p>	<p>will welcome the input and comments of BDWH on the draft SPD.</p> <p>The Council further expect that the final SPD will be available alongside adoption of the DPD.</p> <p>The Council does not consider the comment raises any issues of soundness or legal compliance.</p>
85861	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM16 PMM17	<p>BDWH notes that the PMMs to paragraphs 3.3.4 and 3.3.5 clarify which policies within the adopted Warwick District Local Plan are expanded upon by the proposed Zero Carbon DPD policies. The identification of specific cross-references to adopted policies is welcomed, as is the clarification that no existing policies are being replaced.</p> <p>As a general point BDWH supports the transition to a low / zero carbon future, but considers that neither these PMMs, nor any of the other PMMs being subject to consultation, include sufficient justification to bridge between the existing Warwick</p>	<p>Support for the clarification provided by PMM16 and PMM17 noted.</p> <p>BDWH general comments regarding the justification for the Net Zero DPD policies are noted. The Council considers that these comments were considered during the examination hearings and do not raise any issues of soundness or legal compliance.</p>

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			<p>District Local Plan policies and the proposed Zero Carbon DPD policies. This is particularly the case for where new standards are being brought in and for the proposal to bring the implementation of the Future Homes Standard forward through the proposed new DPD policies. As set out within earlier representations this justification is not considered to be clearly expressed within the DPD evidence base. BDWH proposes that in order to demonstrate the soundness of the proposed new policies these PMMs should be expanded to explain such justification.</p>	
85862	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM18	<p>BDWH notes that the PMMs to paragraph 3.36 states “To assist the implementation of the DPD policies, the Council will also provide supplementary planning guidance alongside the DPD, including on the content of Energy Statements”. BDWH also notes, as set out earlier in these representations, that WDC is currently in the process of producing a Supplementary Planning Document (SPD) which may include further information in relation to this matter, but a draft of this document is also not currently available.</p> <p>BDWH and other parties have raised concerns through the DPD consultation process about the uncertainty that arises from leaving too much detail to SPDs. Draft Policy NZC1 is clear in specifying which development proposals the proposed Energy Statement should be submitted to support and that the proposed Energy Statement should demonstrate the application of the energy hierarchy through showing how the requirements set out in Draft Policies NZC2 (A), (B) &amp; (C) are met, where appropriate.</p> <p>BDWH remains concerned that this proposed DPD policies would not be effective without further clarity on what the required Energy Statements need to include, which in turn would currently impact on the ability to implement the proposed DPD Policies, as drafted, upon adoption. This will be a particular issue in the intervening period between when the DPD is adopted and when a subsequent SPD is adopted. This includes the need to provide more clarity on how the content of</p>	<p>BDWH concerns relating to what details need to be included in an Energy Statement are noted.</p> <p>The Council is in the process of drafting SPD on this matter, the scope of which has already been presented as part of the Examination Hearings (EXAM 16).</p> <p>The Council expect the draft SPD will be subject to consultation commencing in September 2023 and will welcome the input and comments of BDWH on the draft SPD.</p> <p>The Council further expect that the final SPD will be available alongside adoption of the DPD.</p> <p>The Council does not consider the comment raises any issues of soundness or legal compliance.</p>

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			<p>Energy Statements should reflect each type of planning application. The level of detail (e.g. final number, type, mix, design and layout of dwellings) that can be provided at the outline stage is very different to that which can be provided at reserved matters stage.</p> <p>It is also currently unclear whether the level of detail included within an SPD might have an impact on scheme viability and deliverability. PMM18, in deferring all detail to a future SPD, does not go far enough to address this position and this should be resolved through the inclusion of, and consultation on, more details within the supporting text for the proposed policies before the DPD is adopted.</p>	
85863	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM19	<p>BDWH notes that the PMM to paragraph 8.9 states that “The Carbon Offset fund will be separate to the Community Infrastructure Levy (CIL) and other funds and will be used to deliver carbon-saving interventions that would otherwise not be deliverable with other available funds”. BDWH acknowledges that the inclusion of reference to a specific funds does provide clarity on what the intended mechanism is. However, as set out in 5 response to PMM04 there are unanswered questions in relation to: how this intended mechanism will work; what schemes will be funded; whether the approach will be viable; when the fund will be operational; and what measures might be in place in the intervening period until the fund is operational.</p> <p>As with PMM04 this general lack of clarity and certainty will cause an issue with the effectiveness and implementation of the proposed Policy provisions and will disrupt the delivery of new development through the planning application process. BDWH considers that until such further information is available for review and consultation Policy NZC2(C) remains insufficiently justified. PMM04 and PMM19 do not go far enough to address this position and this should be resolved before the DPD is adopted.</p>	<p>The acknowledgement that PMM19 adds clarity is noted.</p> <p>Please also see Council response to Savills on behalf of Barratt David Wilson Homes (Mercia) in relation to PMM04.</p> <p>The Council does not consider the comment raises any issues of soundness or legal compliance.</p>

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
85864	Savills on behalf of Barratt David Wilson Homes (Mercia)	PMM20	<p>BDWH notes that the PMM to paragraph 9.4 states that “Additional guidance in terms of the type and scope of embodied carbon assessments will be included in Supplementary Planning Guidance to support the DPD”. BDWH also notes, as set out earlier in these representations, that WDC is producing a Supplementary Planning Document (SPD) which may include further information in relation to this matter, but a draft of this document is also not currently available.</p> <p>BDWH and other parties have raised concerns through the DPD consultation process about the uncertainty that arises from leaving too much detail to SPDs. Proposed Policy NZC3 is requiring the submission of a specific statement with planning application proposals to explain the approach to embodied carbon. The ‘Ready for Zero’ Report proposes that as the energy performance of a home increases so does its embodied carbon and accordingly highlights that the interdependencies between operational and system wide embodied carbon need to be better understood. BDWH therefore remains concerned that this proposed Policy would not be effective without further clarity on what the required reporting needs to include, which would currently impact on the ability to implement the Policy, as drafted, upon adoption. This will be a particular issue with the intervening period between when the DPD is adopted and when a subsequent SPD is adopted. It is also currently unclear whether the level of detail included within an SPD might have an impact on scheme viability and deliverability. PMM20, in deferring all detail to a future SPD, does not go far enough to address this position and this should be resolved through the inclusion of, and consultation on, more details within the supporting text for the Policy before the DPD is adopted.</p> <p>I trust that you find the representations set out in this letter in order. Please do not hesitate to contact me should you have any questions regarding these representations.</p>	<p>BDWH concerns relating to the required embodied carbon reporting are noted.</p> <p>The Council is in the process of drafting SPD on this matter, the scope of which has already been presented as part of the Examination Hearings (EXAM 16).</p> <p>The Council expect the draft SPD will be subject to consultation commencing in September 2023 and will welcome the input and comments of BDWH on the draft SPD.</p> <p>The Council further expect that the final SPD will be available alongside adoption of the DPD.</p> <p>The Council does not consider the comment raises any issues of soundness or legal compliance.</p>



Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			<sup>2</sup> Future Homes Hub Task Group Report (28 February 2023). Ready for Zero: Evidence to inform the 2025 Future Homes Standard.	
85865	Mr Gary Stocker	N/A	<p>I am giving some ideas towards Warwick District Council's net zero goals, as advertised in the Leamington Observer (<a href="https://leamingtonobserver.co.uk/news/green-minded-warwick-district-residents-invited-to-have-say-on-net-zero-strategy/?fbclid=IwAR0ilqExEjkekuB7fNUIJ-G88kL8SOT4bLiWgGNZ65GHL91xk62UGeWz8GI">https://leamingtonobserver.co.uk/news/green-minded-warwick-district-residents-invited-to-have-say-on-net-zero-strategy/?fbclid=IwAR0ilqExEjkekuB7fNUIJ-G88kL8SOT4bLiWgGNZ65GHL91xk62UGeWz8GI</a>).</p> <p>Firstly, any new builds were possible and practical, as a condition of planning permission, should have all of the energy saving gizmos built in. I believe that at the moment new builds only have to meet a minimum standard. Increasing that standard to everything possible would be good. Similarly any council buildings, where practical and cost effective, should be retrofitted with them.</p> <p>Although I am in favour of solar farms being built (at the end of the day they are easy enough to deconstruct and have the land go back to its original use), I do think that it is better to have solar panels put on roofs, rather than taking up agricultural land.</p> <p>A lot of companies have a green manifesto as part of their ethos. So long as it is genuine, have the council only use them if contracting out different jobs to outside companies.</p> <p>Buses have been a lot more reliable just recently. With the two pounds cap on most fares (which I think is a good idea) there are a lot of incentives to use it. What does people off is when a service is cancelled altogether, being late is bad enough, that is even worse though.</p> <p>What creates a lot of pollution from idling engines are roadworks. I know that this cannot be helped most of the time. What is frustrating though is when some work is carried out and the hole filled in. Then shortly afterwards another</p>	<p>Comment noted. The comment is not a specific response to any of the Main Modifications.</p> <p>The Council does not consider the comment raises any issues of soundness or legal compliance.</p>

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			<p>organisation comes along and digs up the same bit of road! Having some kind of coordination body would help to reduce this.</p> <p>No mow May I think is a good idea. Although there is room for improvement (we all have to start somewhere). I think that you should continue, learning from past experience. Leaving grasslands to grow more absorbs more carbon dioxide, whereas highly maintained grassland can actually create more carbon dioxide.</p> <p>Vegetation is good at absorbing carbon dioxide and other pollutants. Warwick District Council has been good at planting vegetation. Some plants are better than others at absorbing carbon dioxide than others. Maybe having planters (if there is room) with plants like that in at pollution black spots. I used to live in Wellesbourne back in the 1970's. The National Vegetable Research Station (now part of the University of Warwick) was just outside it. They used to have annual open days. One year when I did not go, someone whom I knew went and they mentioned some experimental plants (they resembled cress) which could take in large amounts of carbon dioxide and correspondingly give out large amounts of oxygen. The trouble is that is all that I know about it and everyone who did work there is either retired and or dead. With the plants though, obviously, especially if they are non-native, make sure that they are non-invasive and cannot escape into the wider environment!</p> <p>There are roads and pavements that generate electricity just from being driven on/walked on. One being Pavegen (<a href="https://www.pavegen.com/">https://www.pavegen.com/</a>).</p> <p>So how about getting a Pavegen pavement into an area where there is a lot of foot fall, whether it is council property, in public areas or private shops?</p>	

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			<p>I do not know how much influence that you have with local schools, but teaching children about it will make your job easier in future years. Although be careful how you do it. You do not want to be accused of indoctrination.</p> <p>People cycling more CAN be better for carbon emissions. However if you get a queue of traffic behind them though, that is not so good. So a good compromise are cycle lanes/shared cycle footpaths. I am in favour of those. I certainly have no objection as a pedestrian sharing foot/cycle paths with responsible cyclists (which all of the ones that I have encountered are). If you see one coming you just move over a bit so that they can get past. The only problem is that although the majority of cyclists will use them, you do get a minority who think that they are above that and still use the public highway. I realise that they are entitled to use it, but when the local authority has put a cycle path in, paid for out of public funds, then the least that they can do is to use it. So encouraging cyclists to use them will certainly help with carbon.</p> <p>A lot of cafes which I go to just seem to chuck their used teabags/coffee grounds/tealeaves in the normal rubbish. Putting them into food caddies/green bins would obviously be better. Is there a way to encourage them to do this?</p> <p>One of the consequences of carbon in the atmosphere is rising temperatures. Built up areas can be notorious "hot spots". Lighter colours are obviously better for reflecting heat away. I did repaint our flat garage roof which some silver coloured, reflective roof paint. It certainly shines (and by implication) reflects away a lot of sunlight. So having buildings, infrastructure, etc, made out of lighter coloured materials could help to reflect away sunshine. I know that is treating the symptoms, rather than the cause, but it could still help.</p> <p>Finally emphasise how this is going to save money (where it does) and how it is going to benefit the wider community, to get locals on side.</p>	

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response																					
			I am very passionate about sensible green issues, so please free to contact me if you wish.																						
85866	STANTEC UK LIMITED on behalf of IM Land	N/A	We wish to thank Planning Inspector Andrew McCormack, Programme Officer Ian Kemp, and the Council Officers for the open consultation and positive engagement in the preparation of the draft Warwick District Net Zero Carbon DPD.	Comment noted																					
85867	STANTEC UK LIMITED on behalf of IM Land	PMM09, PMM10, PMM12, PMM13, PMM14	We are pleased to confirm IM Land's support for the changes made as per the Schedule of Proposed Main Modifications, particularly modifications PMM09, PMM10 and PMM12-14 which clarify the scope of the Net Zero target to regulated operational emissions.	Support noted																					
85868	STANTEC UK LIMITED on behalf of IM Land	PMM10, PMM12, PMM13, PMM14	<p>We consider that it would be beneficial to the clarity and effectiveness of the DPD to consolidate the terminology used within it. Due to the iterative preparation and evolution of the DPD, multiple terms are in use to describe the regulated Net Zero aspiration. An example list is provided in the table below. Variations in terminology relating to the same scope and target could be replaced by one consistent phrase which would correspond better to the terminology given in the glossary.</p> <table border="1"> <thead> <tr> <th>Item</th> <th>Location</th> <th>Terminology used</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Page 16 Para 4.2.1 Objective 1</td> <td>net zero regulated carbon</td> </tr> <tr> <td>2</td> <td>Page 19 Para 5.2</td> <td>net zero carbon in operation in relation to regulated operational energy</td> </tr> <tr> <td>3</td> <td>Page 19 Para 5.6</td> <td>total operational carbon emissions (regulated energy) to net zero</td> </tr> <tr> <td>4</td> <td>Page 26 Policy NZA2(B)</td> <td>on-site net zero regulated operational carbon</td> </tr> <tr> <td>5</td> <td>Page 20 Figure 1</td> <td>Operational Net Zero (Regulated Energy)</td> </tr> <tr> <td>6</td> <td>Page 18 Policy NZA1</td> <td>net zero operational regulated carbon emissions</td> </tr> </tbody> </table>	Item	Location	Terminology used	1	Page 16 Para 4.2.1 Objective 1	net zero regulated carbon	2	Page 19 Para 5.2	net zero carbon in operation in relation to regulated operational energy	3	Page 19 Para 5.6	total operational carbon emissions (regulated energy) to net zero	4	Page 26 Policy NZA2(B)	on-site net zero regulated operational carbon	5	Page 20 Figure 1	Operational Net Zero (Regulated Energy)	6	Page 18 Policy NZA1	net zero operational regulated carbon emissions	<p>Comment noted. Although the wording differs slightly in each section, the modifications provide factual clarification that the DPD relates to regulated operational energy and associated carbon emissions.</p> <p>The Council does not consider the comment raises any issues of soundness or legal compliance.</p>
Item	Location	Terminology used																							
1	Page 16 Para 4.2.1 Objective 1	net zero regulated carbon																							
2	Page 19 Para 5.2	net zero carbon in operation in relation to regulated operational energy																							
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5	Page 20 Figure 1	Operational Net Zero (Regulated Energy)																							
6	Page 18 Policy NZA1	net zero operational regulated carbon emissions																							

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			We look forward to engaging with the Council again in the future	
85869	Warwick District Council	PMM1 to PMM20	At its 5 <sup>th</sup> July Cabinet meeting the Cabinet approved recommendations in a report titled 'Net Zero Carbon Development Plan Document (DPD) Update'. Recommendation 2 was as follows: That Cabinet endorses the Main Modifications as set out in the current Main Modifications consultation and confirm that they do not wish to make any representations to that consultation.	Comment noted.
85870	Warwickshire County Council (Infrastructure Planning Lead – Strategic Growth and Infrastructure)	N/A	Just a very quick email to make you aware that I have received no comments from colleagues across the County Council in respect of the main modifications.	Comment noted.
85871	Kenilworth Town Council	N/A	Kenilworth Town Council have reviewed the Major Modifications made by the inspector. We have no objection to the modifications and appreciate the clarification that they provide to the policies.	Support noted.
85872	Kenilworth Town Council	PMM10	Overall the inspectors' changes are to be welcomed as they make clear the DPD will deliver net zero regulated carbon (clause 4.2.1) - not all carbon. However, this is not reflected in the title which should be changed to reflect the new definition.	Support for PMM10 noted.  The title of the DPD was discussed at the Examination hearings. The Council consider the title of the DPD adequately describes the subject matter of the DPD and does not consider the comment raises any issues of soundness or legal compliance.
85873	The Coal Authority	N/A	Thank you for your notification received on the 5 <sup>th</sup> June 2023 in respect of the above consultation.  The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty	Comment noted.

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			<p>to respond to planning applications and development plans in order to protect the public and the environment in mining areas.</p> <p>Our records do not indicate the presence of any coal features at surface or shallow depth within the Warwick District area. On this basis we have no specific comments to make on the Main Modifications proposed.</p>	
85874	Historic England	N/A	Thank you for consulting Historic England on the above document. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the development plan document (DPD).	Comment noted.
85875	Historic England	N/A	Historic England commented on the Warwick District Council Net Zero Carbon DPD Consultation Draft and also on the SA/SEA/HRA Screening and Scoping Report for the DPD in 2021. We have no comments to make on the proposed Main Modifications to the Published Submission Version of the DPD. However, in light of our previous comments, we are pleased to see that the proposed Main Modifications document encompasses references to the historic environment and that the scope of the DPD has been widened from just focusing on new buildings, to referencing the retention and re-use of existing buildings.	Support noted
85876	Historic England	N/A	We are particularly pleased to see the inclusion of Policy NCZ4: Existing Buildings in the DPD and the clause covering the sensitive retrofitting of energy efficiency measures and the appropriate use of micro-renewables in historic buildings.	Support noted.
85877	Historic England	N/A	We also welcome Policy NCZ3: Embodied Carbon and the requirement for the whole[1]life assessment of materials for new development above certain thresholds	Support noted.
85878	Historic England	N/A	Historic England recognises the urgent need for positive action in relation to the global climate crisis and is committed to the achievement of net zero carbon emissions.	Comment noted.
85879	Historic England	N/A	This opinion is based on the information provided by you in the documents dated May 2023 and, for the avoidance of doubt, does not affect our obligation to advise you on, and potentially object to, any specific proposal which may subsequently arise	Comment noted.

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
			from this or later versions of the documents which are the subject to consultation, and which may have adverse effects on the environment.	
85880	Dr Guy Barker	N/A	The net zero plan refers to the new housing but yet again the potential for using a district heating system which would power the new estates has not been considered. Introduction of such schemes have been demonstrated to be capable of driving significant change and helping the heating to become more efficient and to be cost effective. Can this not be included. I would suggest Gussing in Austria as an example to be followed	The comment is not a specific response to any of the Main Modifications.  The use of district heating as a technology to help comply with the NZC policies is considered in the forthcoming SPD guidance.
85881	Anna Corser	N/A	I have been through all this and want to support it.	Support noted.
85882	Katherine Geddes (Warwick Town Council)	N/A	Warwick Town Council considered the Main Modifications on the Warwick District Net Zero Carbon DPD at its Planning Committee meeting on 15th June 2023 and has the following comments to register on it:	Comment noted.
85883	Katherine Geddes (Warwick Town Council)	N/A	The modifications proposed provide reasonable and useful textual and factual clarifications.	Comment noted.
85884	Katherine Geddes (Warwick Town Council)	N/A	Noted with interest that the Net Zero Carbon DPD will supersede the Sustainable Buildings SPD (2008) – supplementary guidance will also be available	Comment noted. A Draft of the Supplementary Guidance to support the NZC DPD is expected to be consulted on in September 2023.
85885	Katherine Geddes (Warwick Town Council)	PMM19	Also noted and supported the new Carbon Offset Fund – separate to CIL and Section 106 funding, will be used to deliver carbon-saving interventions which would not be otherwise deliverable.	Support noted.
85886	Katherine Geddes (Warwick	PMM14	Only one proposed change to policy wording – PMM14 and Policy NZC2(b)	Comment noted.

Rep ID	Respondent Name	Main Modification Ref	Representation	Council response
	Town Council)			
85887	Katherine Geddes (Warwick Town Council)	PMM15	Local Plan Policy CC3 expanded but BREEAM standard of Very Good to still be included for major non-residential schemes – this is supported.	Support noted.
85888	Natural England	N/A	Natural England does not have any specific comments on the Main Modifications proposed for the Warwick District Net Zero Carbon Development Plan Document.	Comment noted.



## 4 Conclusion

- 4.1 This Statement describes how the Council has undertaken the Main Modifications consultation and includes the comments received to that consultation.
- 4.2 At its Cabinet meeting on 5th July 2023 the Council endorsed the Main Modifications as set out in the Main Modifications consultation.
- 4.3 Having considered the comments made in response to the Main Modifications consultation, the Council does not consider that the comments raise any issues of soundness or legal compliance. The Council accordingly looks forward to receipt of the Inspector's report.
- 4.4 Should the Inspector seek any further response from the Council with regard the comments to the Main Modification consultation, the Council will respond at its earliest opportunity.