

Monday 13<sup>th</sup> September 2021

By email only to: [planningpolicy@warwickdc.gov.uk](mailto:planningpolicy@warwickdc.gov.uk)

Dear Sir / Madam,

**RE: Net Zero Carbon Development Plan Document – Consultation Draft**

This letter provides Gladman Developments Ltd (Gladman) response to the current consultation held on Warwick District Council's (WDC) 'Net Zero Carbon Development Planning Document (DPD) – Consultation Draft'. Gladman welcome the opportunity to comment on this document and request to be kept updated of progress moving forwards and any further consultations on the DPD.

Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and has considerable experience in contributing to the Development Plan preparation process and supporting documents, having made representations on numerous Local Plan consultations and participating at Local Plan Examinations across England. It is on the basis of that experience that our comments are made in these representations.

Gladman welcome the preparation of the Net Zero Carbon DPD as it provides additional clarity beyond the policy wording currently contained within WDC's adopted and emerging local development plan documents. It demonstrates a very proactive approach being undertaken by WDC, following declaring a climate emergency in June 2019, and how the Council will try and achieve its goals of becoming a net-zero carbon organisation by 2025 and aiming for the district of Warwick to be as close to net zero carbon as possible by 2030. Therefore, WDC is committed to bringing forward policies ahead of the Government's stated timetable for the Future Homes Standard, whilst ensuring the approach that they take broadly aligns with the approach set out in the Government's outline proposals. At a national level, the UK Government has current targets to reduce emissions by at least 68% against 1990 levels by 2030, by at least 78% by 2035 and to meet its challenging target of hitting net zero emissions by 2050.

Following review of the DPD Consultation Draft, Gladman have identified that there are currently elements of the document which require further refinement, and these are discussed in more detail in the text below. Additionally, in light of the recent publication of the revised National Planning Policy Framework in July 2021, Section 3.1 of the DPD requires a minor update.



### Policy NZC1: Achieving Net Zero Carbon Development

Part 1 of Policy NZC1 is quite vague on *“taking account of up-to-date technology”*. Gladman would suggest that part 1 of the policy is reworded to be more specific and should refer to the *“latest technology”*. Gladman also suggest that the explanatory / supporting text should be reflected within the draft polices themselves for consistency within the DPD.

### Policy NZC2(A): Making buildings energy efficient

Gladman acknowledge WDC’s ambition to require operation of 75% over and above the 2013 Building Regulations standards. This is to align with the introduction of the Future Homes Standard which is currently due to be implemented in 2025. Gladman contend that this policy should be re-worded to state: *“energy efficiency should be made in accordance with the latest building regulations until such time the Future Homes Standard is implemented”*. As currently drafted, there is no flexibility in place for when the 2013 Building Regulations standards are updated and therefore the policy could potentially refer to Building Regulations which could shortly become out-of-date.

### Policy NZC2(B): Zero or Low Carbon Energy Sources

Draft Policy NZC2(B) requires more clarification to identify whether an Energy Statement will be required for all types of application proposals (full, outline or hybrid planning applications). The requirement for an Energy Statement would need to be included on WDC’s planning application validation checklist dependent on which type of applications it was applicable to.

There is no indication in either the draft policy or within the supporting text of what size development the submission of an Energy Statement will be mandatory for i.e. for new housing development – planning applications for 1+ residential dwellings or for new commercial / industrial development what the square metres threshold would be.

Gladman are supportive of Energy Statement’s being included on an updated planning application validation checklist as this will provide WDC with a clear indication of what methods the applicant is looking to install to meet the net zero requirement on their site.

### Policy NZC2(C): Zero-Carbon-Ready Technology

Gladman are unsure how paragraph 7.5 of the supporting text would work in practice. If a developer builds a house and it falls short of net zero carbon specification upon occupation, does this mean that the developer would therefore have to revisit the property and rectify the issue? It would be difficult to expect this to be scrutinised as severely as the supporting text sets out. Gladman stress that it would be more sensible to ensure that any new development is to be zero-carbon ready prior to occupation rather than post occupation.

### Policy NZC2(D): Carbon Offsetting

Gladman maintain that Policy NZC2(D) should refer to planning applications for detailed planning permission only. As currently drafted, all submitted outline planning applications (with all matters reserved except for access) would be subject to either:

a) a cash in lieu contribution to WDC's carbon offsetting fund; or

b) a contribution to a verified local off-site offsetting scheme as each proposal would be unable to demonstrate whether it would net be zero carbon ready at the point of the application's determination.

The requirement of providing the anticipated annual operations carbon emissions from a commercial / industrial type development in the 30 years following the completion of the development would be a significantly difficult task for an applicant to accurately predict. This may result in a lot more viability assessments being submitted by applicants in support of applications if their anticipated cash in lieu contributions are proportionately high.

#### Policy NZC2(E): Viability

Gladman note that Policy DM2 of the adopted Warwick Local Plan 2011-2029 will be superseded by a new policy included within the emerging South Warwickshire Local Plan once it is adopted by the councils. Therefore, there would be no flexibility within the DPD to update this reference.

#### **Conclusion**

Gladman welcome the opportunity to comment on WDC's Draft Net Carbon Zero DPD – Consultation Draft and we request to be kept up to date on the progress of this document moving forwards and any future consultation(s) on the draft DPD. Whilst the Council progress forward with the DPD, it will be important that the provision of additional guidance on this topic is forthcoming and that it aligns with the Government's aspirations and emerging national planning policy and Planning Practice Guidance.

Gladman also note that there is currently a 'live' public consultation in South Warwickshire (6<sup>th</sup> September – 24<sup>th</sup> October 2021) in relation to the potential merger of Warwick and Stratford-on-Avon District Councils to become a new combined district council. The findings from the consultation will be considered at a meeting of the councils on 13<sup>th</sup> December 2021. This may have implications on the progress of the Net Zero Carbon DPD.

Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.

Yours faithfully,



Robert Wilding  
Senior Planner



Gladman Developments Ltd