

Warwick District Green Party

Response to the WDC DPD Consultation (April 2022)

We welcome the move towards improving local building standards through a development plan document (DPD). This aligns with WDC's ambitions for net zero carbon emissions, WDC's Citizen's Inquiry recommendations for stronger planning controls, and the national Committee on Climate Change recommendation for net zero housing. The following paragraphs summarise areas where we believe the document may be improved.

- The definition of 'net zero' has recently come under scrutiny (ref. 1). For housing, a precise, technical definition is imperative in order to avoid misleading descriptions of housing and confusion between developers and customers. A precise definition also allows for accurate energy demand specifications, estimates of in-operation costs, and quantitative accounting of carbon emissions. We suggest that the DPD acknowledges these points in the justification for the plan. We strongly recommend that the DPD refers to and uses the various net zero definitions contained in the new (April 2022) guidance (ref. 2) on delivering net zero carbon buildings produced by the Chartered Institution of Building Services Engineers (CIBSE) and The London Energy Transformation Initiative (LETI).
- The key definitions in the DPD is Paragraph 4.1 "*.....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).* In this regard, please note the points above. It is also desirable to explain that this [regulated operational energy] definition does not cover the 'unregulated' energy used in appliances (e.g. cooking stoves, kettles, microwaves, refrigeration, freezing, washing, IT, TV etc) which amounts to ~50% of all household carbon emissions (Part L 2013) (ref. 3). It is essential that the terms 'net zero carbon', 'regulated' and 'operational energy' are defined in precise terms at the outset to the document.
- No fossil-fuel derived energy sources (including natural gas) should be used in any new developments as these directly increase carbon emissions making WDC's CCAP Ambition 2 target more difficult to achieve. However, this commitment in the DPD is implicit not explicit. For example Paragraph 7.3 "*.....the Council is expecting that energy sources avoid fossil fuels.....*". We suggest that the wording around this commitment is tightened to ensure compliance.
- We welcome the quantified definition of a target for average heating energy demand for existing buildings in retrofitting (Paragraph 10.2 40 kWh/m²/yr – note typo in DPD). It is surprising that similar definitions are not used for new net zero developments. There are many published definitions that could be used. For example, the South Cambridgeshire Local Plan (ref. 4) will lay down a maximum heating energy demand for all new buildings of 15-20 kWh/m²/yr and a maximum energy use intensity (i.e. total energy used) value of 35 kWh/m²/yr. These are straightforward definitions easily understood by developers and householders in terms of energy use, house size and estimated costs per year. [For example, for a typical small house (total floor area 100 m²), the current costs of a maximum annual energy demand would be 35 x 100 kWh = 3500

kWh which translates (April 2022 -ref. 5) to £1144 per year ((3500 kWh x 0.28p/kWh) + 0.45p/day)]. We strongly suggest that average annual energy demands or energy use intensities are defined for all the policy elements in terms of kWh/m²/yr.

- We accept that as a last resort developers pay towards carbon offsetting. However, carbon offsetting through carbon sequestration and tree planting has become increasingly contentious, locally and nationally, as problems of land availability and long term tree maintenance arise: it has become an easy solution to claim and a challenging and unproven solution to deliver. We argue that nature-based offsetting should be 'downplayed' to emphasise the importance of achieving net zero carbon buildings i.e. the offsetting will be achieved within the same sector (i.e. building and development) through retrofitting and new renewable energy generation. We require that the second bullet point in Policy NZC2(C) and specific specifications for tree planting in Paragraph 8.1 are deleted, and the text rewritten to emphasize offsetting within the buildings sector.

References

1. <https://theconversation.com/climate-scientists-concept-of-net-zero-is-a-dangerous-trap-157368>
2. <https://www.leti.london/netzero>
3. <https://www.gov.uk/government/publications/conservation-of-fuel-and-power-approved-document-l>
4. South Cambridgeshire Local Plan
5. <https://www.britishgas.co.uk/energy-price-news.html>