



Planning Policy Team
Warwick District Council
Riverside House
Milverton Hill
Leamington Spa
CV32 5HZ

9th September 2021

Submitted via Email

Dear Sir/Madam

**Response to Warwick District Council Net Zero Carbon Development Plan Document Consultation
Draft July 2021 on behalf of Cuvette Property Consulting Limited**

This representation statement is submitted by Oxalis Planning Limited on behalf of Cuvette Property Consulting Limited in response to the Council's current Net Zero Carbon Development Plan Document (DPD) consultation.

We agree with the overarching objectives of the DPD, as set out in the consultation document.

It is important that a strong and clear policy framework is established so that developers can understand the requirements that will be imposed upon them with regard to reducing carbon emissions during the construction and operation of new development schemes.

Notwithstanding, it is crucial to the continued economic growth of the District that these policies do not prohibit sustainable development from coming forward, through unrealistic expectations or requirements which impact on the viability of delivering new development schemes. The policies should include a level of flexibility which can help to ensure that development is not frustrated and which avoid constraining development ambitions and deterring potential investors in the region.

In this regard, we are pleased that 'Objective 2' seeks to ensure that 'practical and viable low carbon standards' can be applied to new buildings and that Policy NZC2(E) recognises the need for flexibility in applying the policies to certain contexts, understanding that they may not always be a viable option, and that this should not prohibit development being brought forward.

The overarching strategy appears to include the correct balance, through Policy NZC1, for reducing energy demand, incorporating low energy sources of energy and, where necessary, offsetting. Whilst we agree that offsetting should be provided within or as close to the development as possible, this should not prohibit offsetting which lies further away from the scheme, where it can be demonstrated that this is the best and most appropriate way to offset the carbon for the development.