

## **Response to WDC's DPD consultation from Kenilworth All Together Greener\***

---

### **Warwick District Council NET ZERO CARBON DEVELOPMENT PLAN DOCUMENT Consultation Draft - July 2021**

We are delighted that the council is looking to put in place as soon as possible its own planning policy for new buildings to be net zero carbon in construction and in operation.

However, we question whether the Government's Standard Assessment Procedure will be updated in time and in an appropriate manner to fix its current blind spot in regard to the significant performance gap between design and construction. This is absolutely crucial. If this is not addressed then how will developers demonstrate compliance with the WDC's in use standard?

We are also very concerned at the prominence given to offsetting. Offsetting is a very poor substitute for reducing carbon emissions at source and should only be a very last resort.

It is widely recognised that planting trees only removes atmospheric carbon in significant quantities in the longer term. It cannot be used to achieve nearer term targets such as WDC's and as the global climate crisis requires. Renewable energy generation both on and off site are vastly preferable. We also question the proposed use of the carbon price in the EU Emissions Trading Scheme as a suitable metric. This has a track record of being too low to provide the desired leverage.

Finally, we want to see the document use clear, unequivocal, legally enforceable language (e.g. 'require', 'must', etc. rather than 'expect', 'should',). We want it to succeed.

---

\* **Kenilworth All Together Greener** (KATG) is a local community group which holds monthly meetings aimed at providing information, ideas and inspiration about how to live more sustainably. KATG is not affiliated to any political party and its meetings are open to anyone who lives locally. 90-plus Kenilworth residents have attended our meetings, some more often than others. They include adults of all ages, many retired professionals, some serving councillors, and an even gender balance