



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

7th June 2022

Submitted via Email

Dear Sir/Madam

**Response to Warwick District Council Net Zero Carbon Development Plan Document Consultation
Draft April 2022 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 provided a response to the Council's previous Net Zero Carbon DPD consultation in September 2021; this representation is in line with our previous consultation response.

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

As per our previous comments, 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.

In this context, we are pleased that the policies have been revised to 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.

It is appropriate that 'Objective 2' seeks to ensure that 'practical and viable low carbon standards' can be applied to new buildings acknowledging the importance of viability in sustainable development.

Whilst the policies require developers to meet the necessary requirements and apply the 'energy hierarchy', where this is not possible they enable development to come forward which can demonstrate how the energy hierarchy has been applied and why the specifics of any policy cannot be met. This policy approach will help

to ensure that the Council meets its carbon reduction targets, whilst still enabling sustainable development to proceed, where the sustainability credentials of a scheme have been explicitly demonstrated.

With regard to the energy hierarchy, we agree with its structure as it is clear that new development should be brought forward in as sustainable a way as possible, with offsetting only being considered once other options have been explored and discounted.

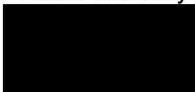
The overarching strategy appears to include the correct balance, through Policy NZC1, for reducing energy demand, incorporating low energy sources of energy and, where necessary, offsetting.

It is positive that the DPD is not prescriptive as to the standards and schemes used in preparing Energy Statements, as this enables the DPD to remain current throughout its lifetime, during which it is probable that new standards and methodologies for calculating efficiencies will be introduced.

Overall, we agree with the Council's approach to addressing the climate emergency. The policies generally incorporate flexibility and acknowledge the importance of viability in sustainable development.

I trust that the above representation is in order and will be considered as part of the consultation on the Net Zero Carbon Development Plan Document. However, should clarification or elaboration be required, please let me know.

Yours faithfully

A black rectangular redaction box covering the signature of Elanor Wright.

Elanor Wright