

Net Zero Carbon Development Plan Document

Consultation Response from Housing (WDC)

Many thanks for providing the opportunity to respond to this consultation document and I would like to submit the following comments.

At paragraph 1.3.1 the document sets out the following:

This DPD aims to focus on minimising carbon emissions from new buildings within the District to support the achievement of national and local carbon reduction targets. In achieving this aim, the DPD will ensure that new development does not add to the District's carbon deficit and will therefore ensure that the significant cost of retrofitting buildings to achieve net zero carbon does not increase.

For clarification, can I please clarify my understanding that this DPD is solely related to the delivery of new homes and will not relate to existing properties? The reference to retrofitting in this section is I feel a little ambiguous.

At paragraph 4.1.1 the document sets out the following:

This DPD aims to minimise carbon emissions from new buildings within the District to support the achievement of national and local carbon reduction targets set out in section 1.1 and paragraph 2.5 above. From adoption (and earlier where possible) 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).

For clarity, can I clarify that the DPD is looking to minimise carbon use 'in operation' rather than look to reduce 'embedded' carbon through the construction process? This is how I read this section.

Section 9 Embodied Carbon:

This section appears to bring in restrictions on embodied carbon for 'New Major Developments' for developments of over 50 homes. This seems to be the first time this concept is mentioned in the DPD and I feel that the method of calculating this will require clarification.

Section 10 Existing Buildings

After previously stating that this DPD is about reducing carbon in new buildings this section suddenly sets out plans for pre existing buildings which are not mentioned in any of the aims or objectives of the Plan. I feel that this is confusing and requires clarification.

General Points:

Could it please be clarified how this DPD would be implemented for applications already in the planning system?

Reference is made to the desire to ensure that there is no 'performance gap' between proposals for reducing carbon usage in new buildings against the reality once the property is complete and being lived in. I would welcome clarification in the document about how this might be tested and whether this will impose costs to developers?

End

