

Comments by Warwickshire Climate Alliance on Warwick District Council's Net Zero Carbon Development Plan Document

New Homes We are glad the council is looking to adopt a document intended to 'ensure all new developments (as set out on para 5.11) should be net zero carbon in operation.' (4.1.1)

However, we believe the approach it has taken does not meet the best standards of building performance, and that it will not achieve the aim of ensuring new buildings are net zero carbon in operation.

We agree with the main points raised in the response by George Martin, Chair of the UK's Building Performance Network. We believe Mr Martin's response reflects the issues raised by expert organisations working towards net zero carbon, such as RIBA and the other organisations cosignatory to their criticism of the government's Future Homes Standard. Mr. Martin's points also accurately reflect the character of the Greater Cambridge Local Plan, which is considered to be a benchmark for future development.

We can see no reason why what is possible in Cambridgeshire, and other counties, should not be possible in Warwickshire. There is certainly no such reason given in this DPD. This is the **key question** we have about this document.

More particularly:

- The DPD restricts itself to a speedier introduction of the standards specified in the Future Homes Standard. However, these standards are not sufficient to ensure future homes will genuinely be net zero. This is the view of the Royal Institute of British Architects, and 20 other organisations concerned with low carbon architecture, including the Energy Saving Trust, LETI, and the Passivhaus Trust.¹
- Following the government's response to the Future Homes Standard consultation, the document concerns only regulated energy. This approach is criticised by the organisations just mentioned, as well as by Mr Martin, and the Greater Cambridge Local Plan proposes strategies to remedy it.
- The methods chosen for ensuring net zero energy use (SAP, SBEM) are widely considered inadequate for this task, and do not take into account the energy performance gap, i.e. the gap between design and actual use. Alternative standards are suggested in the Greater Cambridge Local Plan, and by Mr Martin in his response. These include BREEAM, PHPP, and BS 40101. We are not qualified to comment on the technical suitability of these proposals, but they are clearly considered best practice among experts in the field.
- The DPD lacks specific requirements in terms of space heating expressed in kWh/m²/yr, as recommended by the Committee on Climate Change and included in the Greater Cambridge Local Plan. The Greater Cambridge Local Plan proposes a target of space heating demand of 15-20kWh/m² per annum, as

¹ <https://www.architectsjournal.co.uk/news/government-future-buildings-standard>

- recommended by the Committee on Climate Change. This is not far from the Passivhaus standard of 15kWh/m². The UK average is 133kWh/m².
- The failure to specify the use of BREEAM standards, and in particular, the BREEAM “outstanding” standard which requires reduction of energy use and carbon emissions.

We approve of the council’s Policy NZC2 which requires developers to demonstrate provision of ‘additional renewable, zero and low carbon energy technologies’. We expect that, in the majority of cases, it will be feasible and viable to introduce solar panels, at a small cost to developers. However, the council should more explicitly rule out the use of fossil fuels in new buildings than it currently does (7.3). The proposed Greater Cambridge Local Plan sets out the policy that new buildings not be connected to the gas network.

Regarding embodied carbon, we note the absence of any clear standard determining what is considered desirable. This should be remedied by considering best practice in other local authorities.

We note the narrow focus of this document. Other similar documents, such as the SPD adopted by Stratford, which are less ambitious as regards the emphasis on carbon emissions, have a broader focus, taking into account other environmental issues such as biodiversity as well as the need to adapt to the impacts of climate change that are now inevitable. These topics and more are also considered in the Greater Cambridge Local Plan. Why is Warwick District taking such a narrow approach?

Land Use Even on a narrow focus on carbon emissions, we note the absence of any focus on land use change, which is one of the major sources of carbon emissions. This refers to, e.g., the cutting down of forests or the draining of peat bogs. The major issue locally is the need to protect trees, and other carbon rich landscapes. We know of at least one proposed development in Warwickshire (in Mappleborough Green), where it is planned to cut down a healthy mature wood to build houses. This involves release of the carbon stored in the trees, and the removal of their future carbon sequestration potential. A development that does this cannot be considered ‘net zero’, even if the houses are built to Passivhaus standards with little embodied carbon. In an age of climate emergency it is unbelievable that such developments should apparently be set to go ahead. Yet there is nothing in the local authority policies to clearly rule out such developments. Warwick District should look to remedy this.

Legal action Developers can sue councils if planning permission is refused, and councils often buckle in the face of the risk of unpayable legal fees. We would like to know how WDC would respond to such a challenge, were it to arise.

WCA believes that such cases should be made more public. At the moment, decisions on planning applications are made behind closed doors. Many people would be outraged if they learned that developers are putting our future at risk by trying to evade regulations

and provide housing that does not meet the challenges of the climate emergency. What measures will the council take to mobilise public support for the higher standards it wishes to enforce? How will it ensure that the public is properly informed?

Retrofitting and Energy Efficiency The DPD does not mention retrofitting existing housing. Energy saving by retrofitting can be done in a range of ways, and in particular by householders themselves. Informed householders, reliably guided, would be able to insulate their homes and reduce their emissions very quickly, often at their own expense, and to their own long-term benefit both in terms of cost-saving and of empowerment. By taking action to help themselves, householders will develop their own awareness of the issues, and be better able to support the council across the whole gamut of its emissions-reduction measures. We therefore urge WDC to complement its new-build carbon reduction policies by encouraging and facilitating retrofitting of existing housing. In particular, the local consultancy Act on Energy should be supported and enabled to provide the kind of guidance that would enable rapid retrofitting by home-owners.

We quote a recent comment by the Executive Director of the International Energy Agency, Fatih Birol: “Energy efficiency is a critical solution to so many of the world’s most urgent challenges – it can simultaneously make our energy supplies more affordable, more secure and more sustainable. But inexplicably, government and business leaders are failing to sufficiently act on this. The oil shocks of the 1970s set in motion major advances in efficiency, and it is utterly essential that efficiency is at the heart of the response to today’s global energy crisis. The leaders meeting at the IEA Global Conference on Energy Efficiency need to make this the moment when the world hits the accelerator on efficiency – or we may fail to respond to the current energy crisis properly and pay the price for years to come.”