Part B – Please use a separate sheet for each representation

Name or Organisation: Vistry Group					
3. To which part of the Local Plan does this representation relate?					
Paragraph	Policy ES1	Policies	Мар		
4. Do you consider the Local Plan is :					
4 (1) Logally compliant	Voc	Х		No	
4.(1) Legally compliant	Yes			No	
4.(2) Sound	Yes			No	X
4 (3) Complies with the					
Duty to co-operate	Yes	Х		No	

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy ES1: Sustainable Construction and Design

Sustainable Construction and design are integral to Vistry's operations. Building upon its fabric-first approach, Vistry currently aims to: make its entire build process as efficient as possible; reduce energy demand within its homes; decarbonise the heating of homes; facilitate the use of electric vehicles; and provide green infrastructure at the forefront of its developments.

Vistry are therefore supportive of a move to greater energy efficiency generally in the construction industry and national net-zero carbon targets. However, there needs to be nationally consistent set of standards and programme to ensure that targets set are achievable and technically implementable.

The Government has set out how targets to achieve net zero carbon can be delivered through the Future Homes Standard. There are obvious challenges to achieving this, and the best opportunity for success is to ensure a standardised approach nationally. Standards for energy efficiency is most appropriately set through the Building Regulations .

Policy ES1 should therefore be deleted.

In any case there is no justification for residual emissions offset through payment to a Stroud District carbon offset fund nor for residential development proposals to meet or exceed the standards set out by the Home Quality Mark, or equivalent. The Home Quality Mark has no status beyond that of best practice guide.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy ES1 should be deleted

(Continue on a separate sheet /expand box if necessary)

Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

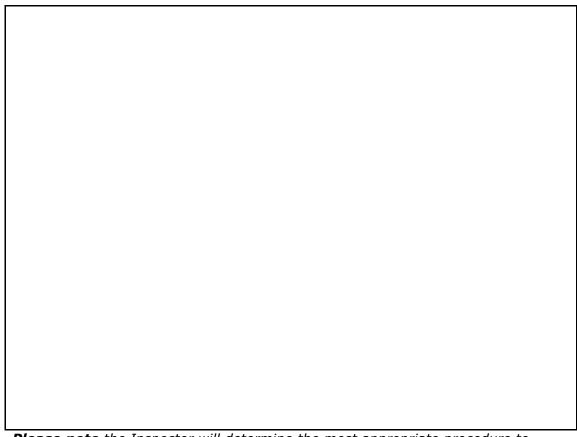
After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:



Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.





Date:21.07.21