

Black Box Planning on behalf of Taylor Wimpey

Hearing Statement

Matter 10: Environment

1. This Hearing Statement has been prepared on behalf of Taylor Wimpey and should be read alongside the Representations submitted in response to the pre-submission (Reg19) version of the Stroud Local Plan (SLP) in May 2021. It seeks to respond to specific questions set out in the Inspector's Matters, Issues and Questions raised in respect of Matter 10, where relevant to concerns held by Taylor Wimpey.
2. These representations are submitted with regard to TW's control over land (130 ha) at Whaddon, with neighbouring promoters L&Q controlling land to the north and Newland Homes controlling a small proportion of the site fronting Grange Road. All parties have been working jointly in respect of the emerging strategic allocation at Whaddon to ensure a comprehensive approach is taken to the masterplanning and deliverability of the site and associated infrastructure.

10a. Sustainable Future

1 c. Are all the policy requirements set out in Core Policy DCP1 justified for a strategic policy and are they achievable? How will a decision-maker determine whether the requirements have been met, for instance how will they know that green infrastructure has been maximised?

3. From the outset, the policy appears at odds with the spatial strategy, in particular strategic allocation PS36 Sharpness New Settlement. The Policy states that all new development ***must be located where the form and mix of development itself or proximity to essential services and facilities minimises the need to travel.*** Similarly, it is not readily apparent how PS37 Wisloe Green could satisfy the second criteria of the policy in discouraging car travel. In this regard, the policy does not appear coherent with other parts of the plan, particularly PS36 which sits most uncomfortably with this policy objective.
4. The policy wording should be revisited to remove the unclear phrasing such as '*to achieve highest viable energy efficiency*'. This suggests that all planning applications could be subjected to viability assessments in order to demonstrate highest standards of energy efficiency. Such an exercise would unnecessarily delay decision making and housing delivery when the objective to promote energy efficiency performance is

adequately catered for by building regulations and other development management policies in the plan in this regard.

Sustainable Construction and Design – Delivery Policy ES1

4. Policy ES1 requires development proposals to meet a number of requirements, including the achievement of a net-zero carbon standard.

a. Is this policy consistent with national policy and relevant Building Regulations and is it justified and necessary? In the event that Building Regulations are altered or updated, how would the policy deal with this?

5. As a leading housebuilder in the UK, TW fully support the spirit and purpose of the policy to promote sustainable construction and design as a key component in working towards the objective of net zero carbon in response to climate change. However, the policy objectives duplicate building regulations, and furthermore risk becoming out of date quickly and not sustaining the plan period with the emergence of new building regulations/standards. In the shorter term, it is out of step with the Department for Levelling Up, Housing and Communities (DLUHC) stepped approach towards Future Homes Standard. DLUHC introduced an interim target of 31% reduction in Co2 emissions over Part L2013. The stepped approach assists adjustments across the development industry including supply chains and skills.

b. Are the requirements set out in the policy achievable and viable?

6. The policy seeks an overall minimum 35% reduction in emissions over Part L2013 Building Regulations and, a minimum 10% reduction in emissions over Part L 2013 Building Regulations in homes through fabric energy efficiency improvement, and residual emissions offset through a carbon footprint calculator. TW are adopting a fabric first approach to improve the environmental performance of their homes, including reducing carbon. New TW homes incorporate photovoltaic solar panels and air source heat pumps to offset carbon. The policy should be amended to align with Government proposals currently being implemented through transitioning building regulations.
7. At the Regulation 18 and Regulation 19 consultation stage, our representations requested clarification on the methodology and viability evidence in relation to the Stroud District carbon offset fund as referred to in Policy ES1. It remains our assumption therefore that the Council will publish information for separate consultation to assist the proper examination of policy ES1. It is noted that the carbon offset fund is not detailed in the Viability Assessment (EB111). Furthermore, it is not appropriate to defer this matter to individual site viability assessments during the

planning application stage. It is fundamental that the policy implications are fully evidenced in viability before policies are adopted. It would be unsatisfactory for Policy ES1 to become a viability issue during development management decisions therefore causing significant delays to housing delivery.

c. Should the policy incorporate transitional arrangements? If so, why and what should these be?

8. The policy should mirror those of building regulations as this is what the development industry, national supply chains and skills education are working to. There is little to be gained by seeking to accelerate beyond the national programme as to do so risk jeopardising housing delivery, especially when the policy requirements have not been robustly tested.

Heat supply – Delivery Policy DES3

8. Is this policy supported by the evidence base and is it viable and deliverable?

9. TW have objected to this policy in our earlier representations. The policy should not require provision of infrastructure on development schemes to connect to ‘planned’ heat networks, including connections ‘currently unviable’ when potentially there is no prospect of the plant ever being utilised. The policy presents grave viability and uncertainty for development proposals. In practice, the policy will cause significant delays to the determination of planning applications and housing delivery by resulting in viability submissions for every development proposal.
10. The approaches and technologies towards better energy efficiency in house buildings is rapidly evolving as we seek to optimise opportunities for meeting climate change objectives. A policy seeking to prioritise heat networks may prove undesirable in the longer-term and the responsibility to come forward with the most energy efficient proposals should be with developers.

Valuing our historic environment and assets – Delivery Policy ES10

e. Criterion 4 of the policy refers to the protection and enhancement of key views and vistas. Is the policy clear on how these terms will be defined? Is it intended to refer to those which are relevant to the heritage asset’s setting or all views?

11. The policy is too vague and open to much interpretation. For example, what is a key view and what is not a key view? The policy should be amended to place emphasis on masterplans and development scheme layouts to demonstrate how consideration of the historic environment has informed proposals.

f. Is criterion 5 consistent with national policy, for example in its approach to the level of any harm or loss and the differences between designated and non-designated heritage assets?

12. Criterion 5 of the policy is too broad and does not reflect the detailed approach in NPPF regarding levels of harm to heritage assets and weighing such harm as part of a balanced judgement.