

Local Plan Review
The Planning Strategy Team
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Our Ref: 08-20 TE
Your Ref:

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By email only:
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RE: CONSULTATION - LOCAL PLAN REVIEW – DRAFT – January 2020

INTRODUCTION

These representations are submitted on behalf of Persimmon Homes Severn Valley (PHSV).

PHSV are committed to providing the homes that people need within the Stroud District Council administrative area as well as within the wider area. Considering the number of homes we provide within the region, we are well placed to provide constructive feedback on the practical implications of the proposed policies and their likely impact on the ability for the construction industry to balance high quality residential developments with a need to build greater volumes at a greater speed.

PHSV would be pleased to engage positively with the Council to discuss the practical implications of such policies within and outside of the formal emerging planning policy consultation process.

Before we turn to considering various proposed policies in detail, it is important to set out the overall context that these comments should be read within.

OVERARCHING CONTEXT

At the heart of the NPPF and indeed the national agenda, is the requirement for local planning authorities to significantly boost the supply of housing, both market and affordable housing. To this end, the government have set a target of delivering a minimum of 300,000 homes per year.

The delivery of new housing contributes to the social and economic roles of sustainable development and it delivers major benefits in line with national and local policy.

The government have created a standardised method for calculating housing need. This data shows that between 2016 and 2026, Stroud District Council have a need for 638 homes per year; this is a 40%

increase on the numbers proposed in the adopted Local Plan. Factored from 2020 to 2040 to cover the emerging Plan's lifespan, the standard method equates to a need for 12,760 homes across the period. The need for 638 homes per annum should be considered against the government's publication of the Housing Delivery Test which demonstrates that in 2015, 2016 and 2017, Stroud District Council delivered 430, 356 and 501 homes respectively. Considering the standard method provides a minimum need figure which needs to then be adjusted to form a housing requirement figure based on other issues such as affordability and employment trends, it is clear to see the scale of the challenge which the Council faces.

The problems of unmet housing need and delivery problems does not just beset market housing or general housing need. There is a particular problem in the Stroud District Council administrative area with the delivery of affordable housing.

The Local Plan Review, under Core Policy CP9, states there is an overall unadjusted need for affordable housing of 425 dwellings per annum. Over the past 3 years, there has been an average of 118 gross affordable housing completions per annum. The net figure when taking account of Right to Buy losses amongst other variables likely means that this figure is even lower on average per annum. Over the past 3 years, of the 1,421 net dwellings completed in the Council area, only 354 gross affordable homes were delivered; this is equal to a yield of 25% affordable housing.

If the affordable housing need of 425 dwellings per annum were to be met across the plan period, affordable housing would need to make up 66% of all housing delivered in the period. Understandably this would not be viable and therefore a lower affordable housing target is set at 30%. Whilst it is understandable that a lower affordable housing target needs to be set, it is important to understand the implications of emerging development management policies in the context that the Local Plan is failing at the outset to meet the full needs of household's requiring assistance with their housing choices.

The Council stipulates that affordable housing provision is a priority issue over the Plan period and this should be reflected in its choices on those policies which are likely to impact on the delivery of housing, especially where these policies are aspirational and desirable rather than supported by robust evidence of need. Housing delivery, both market and affordable, should be maximised as far as is practicable across the Plan period.

In cases where development management policies render a scheme unviable, it is almost always the case that this results in the affordable housing element of a scheme being reduced in order to ensure the scheme is deliverable.

If the Council acknowledge there is an unadjusted need for affordable housing of 425 dwellings per annum, with the average annual provision of 118 affordable dwellings, the Council should be ensuring that aspirational and desirable policies on housing standards, over and above national requirements, are robustly evidenced and considered in terms of their priority as they risk having a serious impact on the number of homes delivered across the Plan period as well as the affordability of those homes which are delivered.

PHSV GENERAL COMMENTS ON THE LOCAL PLAN REVIEW

Compliance with the NPPF

As stated in paragraph 1.9 “*local plans must be consistent with the principals and policies contained within the NPPF*”. Furthermore, the Local Plan Review (page 15) states a priority issue of the plan is for “*prioritising the use of brownfield, under used and infill land through the use of settlement boundaries*”. Whilst paragraph 17 of the NPPF supports the use of brownfield sites in that objectively assessed needs should make as much use as possible of previously- developed or ‘brownfield’ land, it does not give priority or preference to the use of brownfield sites ahead of that of green field. Instead, wording on page 15 could be amended as follows:

“~~prioritising~~ maximising the use of brownfield, under used and infill land through the use of settlement boundaries”

Viability

Under the previous NPPF/ PPG, viability assessment was a material part of planning decision making, predominantly assessed at the development management stage and determining the level of planning obligations including affordable housing. Under the most recent NPPF/ PPG, viability is assessed earlier in the process at the plan-making stage. The NPPG (10-001-20190509) in relation to viability and plan making states that:

“policy requirements should be informed by evidence of infrastructure and affordable housing need, and a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106”

Whilst the Local Plan Review is accompanied by a series of documents that forms its evidence base, it appears that a viability assessment has not been included in the available documents. A viability assessment is essential as it ensures that the proposed policies are realistic and will not undermine the deliverability of the plan. As this representation will refer to further on, it is imperative that site allocations and Local Plan policies are viable so that it does not hinder the ability to provide for the sharp increase in housing numbers and the significant demand for affordable housing in the plan period.

PHSV COMMENTS ON SPECIFIC LOCAL PLAN POLICIES

Core Policy CP3

Policy CP3 of the Local Plan Review sets out a hierarchy for growth and development across the district. This hierarchy is based upon the settlements size and service provision. PHSV support the approach that the primary growth and development should occur in the Tier 1 main settlements, of which includes land controlled by PHSV to the West of Draycott, Cam, which we are jointly promoting with Robert Hitchins Ltd.

Whilst PHSV support that growth should be targeted in those locations served by the best services and facilities, the hierarchy fails to reflect the significant constraints imposed on settlements within Stroud. This is touched upon in the policy wording for Tier 3a settlements in that *“some of these settlements outside the AONB may have scope to help meet the needs of more constrained Tier 1 or Tier 2 settlements”*. Therefore, PHSV do not agree that the proposals for new development should be located in accordance with the District’s settlement hierarchy. Instead we consider the hierarchy should be used to classify settlements, but it should be clear that other factors should determine the exact level of development appropriate at each specific settlement within the hierarchy.

The Local Plan Review plans for at least 12,800 dwellings, a 40% increase on the current Local Plan target. Within this there is a significant reliance on two new settlements at Sharpness and Wisloe to provide approximately 30% of this growth. There are often unforeseen circumstances in terms of the delivery of sites, and in light of Government Policy to significantly boost housing supply, it is important to plan a mechanism to meet any housing shortfall. Sedgemoor Local Plan, adopted in February 2019, includes the following policy mechanism under the heading ‘Managing Housing Delivery’:

“Development proposals will be expected to support the delivery of the required infrastructure in accordance with the Council’s Infrastructure Delivery Strategy (IDS). This will include flood defence, transport, community and cultural facilities, health care, education, and green infrastructure.

The Council will manage housing delivery positively and proactively through its housing trajectory, ensuring that a minimum of five years deliverable land supply for housing is maintained. The release of additional unallocated greenfield land for housing (i.e in addition to sites that can come forward under criteria based policies T2a, T3a, T4 and D9) will only be approved where through monitoring it is demonstrated that there is a shortfall in the five year supply of deliverable land supply for housing. In such circumstances, the release of sites of an appropriate scale will be considered at Bridgwater, Burnham-on-Sea and Highbridge, and Tier 1 and 2 settlements, given that they have the potential to accommodate strategic levels of growth. Sites should normally be identified in the SHLAA as having 'future potential' and satisfy the requirements of other relevant policies in the Local Plan and Neighbourhood Plan (where applicable)."

It is considered that a similarly drafted positive mechanism would be appropriate here as it will ensure housing delivery is maximised across the Plan period. This would be especially beneficial in light of the housing crisis faced in Stroud summarised at the start of this representation.

PHSV COMMENTS ON SPECIFIC DRAFT SITE ALLOCATIONS

Mini-vision for Cam and Draft Site Allocation PS24

PHSV control land within the draft site allocation PS24 and are jointly promoting the site with Robert Hitchins. We are therefore in support of the inclusion of the site allocation in the Stroud Local Plan Review.

Cam is recognised in the Local Plan for its significant contribution to the District, identified as a Tier 1 settlement, the second largest population after Stroud and offering a 'very significant employment role'. This is reflected in the Stroud Local Plan Review in that:

"Cam and Dursely have the best access to key services and facilities of anywhere in the district".

Draft Site Allocation (PS24) includes a capacity of up to 700 dwellings. This corresponds to the capacities identified in the SALA under sites CAM013 and CAM025, in which densities of 25-30dph are suggested for the area.

At this initial stage of site assessment through the SALA process, it is unlikely that the capacities and suggested densities have been informed by detailed technical reports on the site. Furthermore, in regards to densities paragraph 123 of the NPPF states it is *"especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the*

potential of each site” (our emphasis). This is reflected in Stroud Local Plan Review Delivery Policy HC1, paragraph 1 where housing development will be permitted where “*the density proposed is at as high a level as is acceptable, in terms of townscape, street scene and amenity*”. This however is not consistent throughout the plan, as per the low densities proposed for allocation PS24, West of Draycott, Cam.

The Local Plan Review plans for a “*minimum*” of 12,800 dwellings in the plan period. It is important to note that this figure is seen as a “*minimum*” target, and the plan should accord with the NPPF to “*optimise*” the densities within its site allocations.

The housing target is also reliant on the two new settlements at Sharpness and Wisloe (approximately 30% of the total housing target for Stroud). There has yet to be any viability work made available regarding either new settlement to prove its deliverability in the plan period and there is the potential for unforeseen circumstances in the delivery of other site allocations. In addition to this the Local Plan Review identifies there is an unadjusted need for 425 affordable housing units per annum, so the provision for housing should be maximised.

PHSV therefore suggest that allocation PS24 is amended to provide a minimum of 850 dwellings subject to detailed masterplanning on the site. This reflects the NPPF’s desire to optimise densities, the deliverability of alternative site allocations in the local plan review and the significant need for affordable housing in the district. The capacity will be subject to the outcome of technical reports analysing the opportunities and constraints of site, a process which we are currently in the process of undertaking in order to inform a detailed masterplan. An initial masterplan of the site is included at **Appendix 1**.

Draft Site Allocation PS24 states that a “*development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated manner*”. Due to the masterplanning and design of the site being dependent on the outcome of extensive technical reports, PHSV suggest that this is deleted and instead incorporated into the Design and Access Statement (DAS) to accompany an application.

The policies map of Draft Allocation PS24 includes the requirement for Strategic Landscaping including green infrastructure and is visualised on the north and west boundary. Whilst PHSV acknowledge this will most likely be provided, the extent of this green infrastructure will need to be determined following the outcome of the technical reports. Although it is noted to be indicative for the purpose of the policies plan, any visualisation may prejudice the site in terms of the future masterplan and how it is perceived. PHSV therefore suggest that the visual element of the Strategic landscaping on the north and west boundary of the concept plan is removed. The concept plan includes the requirement for “GI”, Green

Infrastructure so removing the illustrative strategic landscaping would not remove the importance of the inclusion of strategic landscaping currently put forward as part of this policy.

In addition to the strategic landscaping the draft site allocation is proposed to provide 'community uses'. The wording of 'community uses' is vague and a definition of the term is not provided. PHSV have held regular discussions with the District and Parish Council and besides the need for a new primary school, there has been no discussions regarding the requirement for additional community uses at draft allocation PS24. PHSV therefore suggest that the requirement for community uses is deleted from the site allocation.

Following the above comments, PHSV suggest the policy wording of PS24 is to be revised to:

"Land west of Draycott, as identified on the policies map, is allocated for a strategic mixed use development, including ~~up to 700~~ a minimum of 850 dwellings, primary school, strategic landscaping and green infrastructure and associated ~~community and~~ open space uses. Detailed policy criteria will be developed to highlight specific mitigation measures and infrastructure requirements and how development will prioritise walking, cycling and public transport over the use of the private car. Applications will need to be accompanied by a Design and Access Statement which ~~A development brief incorporating an indicative masterplan, to be approved by the District Council,~~ will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner with the wider allocation".

Mini-vision for Kingswood and Draft Site Allocation PS38

PHSV control the draft site allocation to the South of Wickwar Road, Kingswood, and are therefore supportive of its inclusion for residential development in the Draft Local Plan Review. It is noted the wording of the draft allocation begins:

"subject to the satisfactory resolution of existing school capacity issues at Kingswood, land south of Wickwar Road, as identified on the policies map, is allocated for a development comprising 50 dwellings and associated community and open space uses and strategic landscaping".

Firstly, the wording regarding the school capacity issues is not acceptable. The existing school capacity is out of PHSV's control and applicants should not be responsible for resolving pre-existing issues. Every new application should mitigate its own impacts and shouldn't be predicated on fixing existing issues which may make the scheme undeliverable and furthermore the Local Plan not sound. This fails to accord with the NPPF, in particular paragraph 16(b) which states that *"plans should be prepared positively, in a*

way that is aspirational but deliverable". The school capacity issue should therefore be deleted from the policy wording and replaced with wording stating that the development will be expected to mitigate any impacts it generates.

In addition, draft site allocation PS38 is proposed to provide 'community uses'. As referred to in regards to the draft allocation at Cam, the wording of 'community uses' is vague with no definition of the requirement provided. Similarly, PHSV are in regular contact with the District and Parish council and there has been no discussions regarding the requirement for additional community uses. PHSV therefore suggest this requirement is deleted from the draft site allocation.

Kingswood is a Tier 3a settlement that lies predominantly outside of restrictive designations. The 2018 update of the Stroud Settlement Role and Function Study identifies the settlement as offering very good accessibility to Wotton-Under-Edge and to key services and facilities. Kingswood is also a significant importer of workers, most notably with the Renishaw facility and Katherine Lady Berkeley School. Due to the significant constraints of Wotton-Under-Edge, there is a strong case for further growth at Kingswood than is currently reflected in the draft site allocation.

As referred to in the Cam mini-vision section of this representation and in light of the NPPF's desire to optimise densities, PHSV suggest the wording of the draft allocation to be revised to provide a minimum of 50 dwellings with the eventual capacity to be determined through detailed design and masterplanning work following the outcome of detailed technical reports.

As referred to in the above comments on the draft site allocation at Cam (PS24), the policy wording of PS38, South of Wickwar Road, Kingswood requires a development brief to be approved by the District Council. PHSV deem this to be excessive for a site of this size of predominantly residential land use and instead should be incorporated into the Design and Access Statement (DAS) which will accompany an application.

PHSV therefore suggest the policy wording of PS38 to be revised to:

~~"Subject to the satisfactory resolution of existing school capacity issues at Kingswood, Land south of Wickwar Road, as identified on the policies map, is allocated for a development comprising a minimum of 50 dwellings and associated community and open space uses and strategic landscaping. Detailed policy criteria will be developed where necessary to highlight specific mitigation measures and infrastructure requirements. A development brief incorporating an indicative masterplan, to be approved by the District Council, will detail the way in which the land uses and infrastructure will be developed in an integrated and co-ordinated manner."~~

Mini-vision for Berkeley

Page 115 of the Local Plan Review shows the mini-vision for the settlement of Berkeley. PHSV application S.14/0619/FUL to the east of Berkeley was approved at appeal in November 2016 and is currently under construction. It is noted that the site lies outside of the proposed Settlement Development Limits (SDL). As this application has been formally approved, PHSV suggests the site should be reflected in the SDL of Berkeley and have attached, see **Appendix 2**, the site location plan detailing the boundary of our site for inclusion in the SDL.

Policy CP8- New Housing Development

PHSV support the wording of Core Policy CP8 in that *“new housing development must be well designed to address local housing needs, incorporating a range of different types, tenure and sizes of housing, to create mixed communities”*. One of the priority issues listed on page 16 is *“providing the right size of accommodation to meet local needs (particularly for smaller, cheaper market and affordable homes) and to help with social cohesion”*. PHSV as a house builder tends to cater for predominantly first time buyers or downsizers, with the majority of our houses two and three bedroom, smaller and more affordable housing.

The policy wording states that residential development proposals will:

“4. Use sustainable construction techniques and provide renewable or low carbon energy sources in association with the proposed development and

5. Enable provision of infrastructure in ways consistent with cutting greenhouse gas emissions and adapting to climate change and its consequences.”

As referred to earlier in this representation, it is important that aspirational policies are subject to a viability assessment at the plan making stage to ensure schemes are deliverable when all policies and standards are imposed. Without a full assessment of the viability of all policies on schemes, undoubtedly the ability to maximise the delivery of housing and in particular affordable housing will be seriously hampered.

Policy CP9- Affordable Housing-

Stroud has an unadjusted need for 425 affordable dwellings per annum. PHSV support the inclusion of a district wide affordable housing policy which will assist in meeting this significant affordable housing need. However as discussed earlier in this representation it is crucial that this requirement has

undergone a viability assessment, tested in combination with all other local plan policies and standards to ensure it does not compromise the deliverability of potential sites.

It is important that flexibility is added into the policy wording and reflect that if a scheme is deemed not deliverable on a 30% affordable housing threshold, a reduced provision will be acceptable if supported by a robust viability assessment at development management stage. PHSV suggest the following wording to be added to Core Policy CP9:

*“The Council will negotiate the tenure, size and type of affordable units on a site by site basis having regard to housing needs, site specifics and other factors. **If it is demonstrated the site would not be deliverable with a 30% affordable housing provision, a reduced provision will be acceptable providing it is supported by a robust viability assessment.**”*

The quantity of affordable housing provision can be increased by increasing the capacity of site allocations in the local plan review. Residential allocations are most likely to be able to provide a policy compliant level of affordable housing and generally contribute a large percentage of a Plans affordable housing delivery. PHSV are in control of land within allocation PS24- West of Draycott, Cam, and PS38- South of Wickwar Road, Kingswood. As stated above, the NPPF supports the optimising of densities and the capacity of both sites should be increased to reflect this, which in turn will increase the provision of affordable housing units and significantly contribute to the annual need of 425 units.

Policy HC1- Detailed criteria for new housing developments

Policy HC1 provides detailed criteria for new housing developments in the district. Paragraph 4 of this policy states development “*would not cause the loss of, or damage to, any open space which is important to the character of the settlement*”. The vagueness of this policy gives rise to subjective decisions which reduces developer confidence. Instead, PHSV suggest the wording of paragraph 4 to be revised for preciseness to reflect the designations in local planning policy and allow for development in exceptional circumstances:

“4. it would not cause the loss of, or damage to, any **designated** open space **which is important to the character of the settlement**, unless it can be demonstrated the benefits of doing so outweigh the harm to its loss” .

Policy HC3- Self-build and custom build housing provision

PHSV support the inclusion of self-build and custom build dwellings as an additional contribution to the housing requirement within settlement development limits and single plot affordable self-build and custom build dwellings adjacent to settlement development limits as proposed in Policy HC3.

PHSV are not supportive of a policy requirement for the inclusion of a minimum 2% of the dwellings on strategic allocations to comprise self or custom build dwellings. The effect of this would be to change one type of housing delivery to another without increasing the total supply. As concerns have alluded to previously in this representation, there has been no viability evidence shown to demonstrate that this policy is viable when applied in combination with all the proposed policies in the Draft Local Plan Review.

Instead, if the council wishes to bring forward the provision of self and custom build dwellings it should do so on specific sites for such development. NPPG (57-025-201760728) states that an authority could increase self-build and custom housebuilding provision by using their own land, engaging with landowners who own sites that are suitable for housing and encourage them to consider self-build and custom housebuilding and working with custom build developers to maximise opportunities for self-build and custom housebuilding. All three of these methods would increase the provision of housing as opposed to transferring from one type of delivery to another.

The 2019 Draft Gloucestershire Housing Needs Assessment shows there is a total of 166 applicants on the self-build register for Stroud. The NPPG (57-011-20160401) states that this should not be the only source of evidence and should be supported by secondary information such as building plot search websites. 160 of these applicants had registered prior to the October 2017 register fee, with the only eligibility criteria being the need to satisfy locational conditions, with only 6 new applicants since the fee. The introduction of a £75 fee appears to be one reason for the decrease in self-build register applications in Gloucestershire as a whole, but this may not necessarily be the only reason. If all new strategic sites (8,700 dwellings) are to require 2% self/custom build plots, then approximately 174 self-build/ custom build plots would be provided. This is greater than the current demand, however the register should not be used as the sole evidence base for the demand, as prior to the introduction of a register fee, applications to join the self-build register were free and relatively simple. It is therefore possible that self-build plots could be allocated when there is no longer demand. To reduce the possibility of over-providing for self-build/ custom build housing on existing site allocations that are imperative to meet the housing target, specific self/custom build allocations should be provided on site specific allocations, and the policy wording requiring 2% of strategic allocations to consist of self-build/ custom build dwellings should be deleted.

Policy ES1- Sustainable construction and design

PHSV applaud the Council for seeking to address climate change through setting energy requirements for new development. Persimmon Homes as a group wide company also recognise the importance of reducing energy costs for our customers as well as reducing the impact of our schemes on the environment. To this end Persimmon Homes build the majority of our homes through timber framed construction at our own facility which designs and builds large elements of our homes off site before delivering them to site. The “fabric first” approach to designing our homes to be as energy efficient as feasible through build techniques ensures that our homes perform to a higher energy standard than current building regulations prior to consideration of retrospective additions such as photovoltaics.

We do however have concerns with a number of the Council’s proposed policies in relation to sustainability in terms of their practical delivery as well as their feasibility and viability impact on the ability of the housing sector to deliver the scale of homes identified as being needed across the Plan period.

It is important to note at this point, which is relevant to a number of the proposed policies in this section of the emerging Plan, that a recent amendment to the Planning Practice Guidance (PPG) sets out the following:

Different rules apply to residential and non-residential premises. In their development plan policies, local planning authorities:

- *Can set energy performance standards for new housing or the adaptation of buildings to provide dwellings, that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes.*
- *Are not restricted or limited in setting energy performance standards above the building regulations for non-housing developments.*

The Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. Such policies must not be inconsistent with relevant national policies for England. Section 43 of the Deregulation Act 2015 would amend this provision, but is not yet in force.

The Written Ministerial Statement on Plan Making dated 25 March 2015 clarified the use of plan policies and conditions on energy performance standards for new housing

*developments. The statement sets out the government's expectation that **such policies should not be used to set conditions on planning permissions with requirements above the equivalent of the energy requirement of Level 4 of the Code for Sustainable Homes** (this is approximately 20% above current Building Regulations across the build mix).*

Provisions in the Planning and Energy Act 2008 also allow development plan policies to impose reasonable requirements for a proportion of energy used in development in their area to be energy from renewable sources and/or to be low carbon energy from sources in the locality of the development. (Our emphasis) (Paragraph: 012 Reference ID: 6-012-20190315)

Energy efficiency requirements for new homes are set by Part L (Conservation of Fuel and Power) and Part 6 of the Building Regulations. In 2019 it was announced that the Government will be launching a Future Homes Standard from 2025 for new build homes to be future-proofed with low carbon heating and world-leading requirements for new homes. The Government are currently consulting on a proposed uplift in Part L Standards which will see changes come into effect later this year (2020), and be a partial step towards the Future Homes Standard.

Delivery Policy ES1 contains requirements above that of Level 4 of the Code for Sustainable Homes and those proposed requirements as part of the Building Regulation Part L 2020. The Future Homes Standard consultation proposed to remove the ability of Local Authorities to set higher efficiency standards than that of building regulations and states:

"We appreciate both uplift options increase the costs for home builders and so we propose to remove the ability of local planning authorities to set higher energy efficiency standards than those in the Building Regulations. This has led to disparate energy efficiency standards across the country and can create inefficiencies in supply chains, labour and potentially quality of outcomes. Removing this ability will create certainty and consistency"

We support the intentions of **Delivery Policy ES1** which seeks to set out the overall vision and strategy for sustainability in new developments however it is too prescriptive and some of the stipulations imposed do not align with national policy and the uplift in Part L Standards that is to come into effect later this year (2020). Therefore by the time the Local Plan Review is adopted, Delivery Policy ES1 would not accord with national policy and building regulations and therefore would be found not sound. We therefore advise that the policy text should be amended to comply with the forthcoming changes to the uplift in Building Regulation Part L. It is noted in the policy wording that *"these standards are required unless it*

can be clearly demonstrated that they are not viable for the development in question". As alluded to frequently in this representation, it is important that a viability assessment of the proposed policies and standards is undertaken at the plan-making stage to accord with the revised NPPG guidance (10-001-20190509).

PHSV welcome the inclusion of further sustainability standards as set out in Delivery Policy paragraphs 2-9. However, it is imperative that these standards, in particularly all the proposed HQM standards, are undertaken as part of a viability assessment involving all of the proposed policies and standards to determine the impacts to a development and to ensure it would not affect the deliverability of sites coming forward as part of the Local Plan.

In addition, paragraph 8 of Delivery Policy ES1 states *"Enable electric vehicle charging- New development with off road parking should provide electric vehicle points (HQM or equivalent) in accordance with Local Plan Standards"*. The wording of this policy is vague and gives rise to misinterpretation as to whether it regards the specific development or individual dwellings. Instead, as seen in Policy G2 of the Gloucester Pre-Submission Plan, the wording should be revised to:

"Enable electric vehicle charging- ~~New development with off road parking should provide electric vehicle points (HQM or equivalent) in accordance with Local Plan Standards~~ An electric vehicle charging point/ socket will be provided at every new residential property which has a garage or dedicated residential car parking space within its curtilage"

A viability assessment should consider not only the direct costs of this provision, but the full costs associated with any required upgrades to the electricity network in that area.

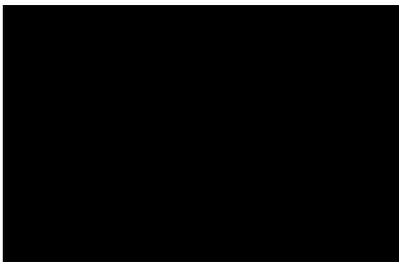
Policy DES3- Heat Supply

PHSV also support the inclusion of Policy DES3 to provide heat from more sustainable sources. The current policy wording indicates this should be provided where viable, and it is important that this is included as part of a viability assessment at the plan-making stage. In addition, the feasibility of such heating systems should also be a consideration as to whether it is provided on site, with the potential for limitations such as environmental constraints to restrict the capability of providing sustainable heating systems on site. PHSV suggest the policy wording should be revised to:

*"Development proposals should include a communal low-temperature heating system where viable **and feasible**".*

These comments are intended to be constructive and PHSV would be pleased to enter into further discussions on these comments as well as the practical implications of draft policies. I would appreciate being kept informed of any future consultations.

Yours sincerely,



Persimmon Homes Severn Valley



Appendix 1: Initial Masterplan-West of Draycott, Cam

Appendix 2: Berkeley Application S.14/0619/FUL Site Boundary