

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is :

|   |     |  |    |  |
|---|-----|--|----|--|
| 4.(1) Legally compliant                       | Yes | <input checked="checked" type="checkbox" value="X"/> | No | <input type="checkbox"/>                             |
| 4.(2) Sound                                   | Yes | <input type="checkbox"/>                             | No | <input checked="checked" type="checkbox" value="X"/> |
| 4 (3) Complies with the<br>Duty to co-operate | Yes | <input checked="checked" type="checkbox" value="X"/> | No | <input type="checkbox"/>                             |

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.

These representations have been prepared by Black Box Planning on behalf of Taylor Wimpey (TW) in respect of the land interests at site G2: Land at Whaddon. TW have majority control over land (130 ha) at Whaddon, with neighbouring promoters L&Q controlling land to the north (previously Hallam Land) 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.

**Delivery Policy ES1: Sustainable Construction and Design**

Policy ES1 relates to sustainable construction and design, the objectives of which are fully supported by TW. As a leading housebuilder in the UK, TW support the district council's objective net zero carbon in response to climate change.

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 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. The policy risks becoming out of date quickly with the emergence of new building regulations. Part L 2013 will be replaced by a revised Part L document. The revised document proposes to increase the need to reduce carbon output from dwellings and the current proposal suggests a 31% reduction above Part L 2013. The changes proposed to Part L under consultation also recommend a 'fabric efficiency' led approach to carbon reduction. The policy should be amended to align with Government proposals currently being implemented through building regulations.

At the Regulation 18 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. We understand work regarding the carbon offset fund has not progressed at this stage. It remains our assumption therefore that the Council will publish information in due course and undertake separate consultation on how such contributions are calculated and TW reserve the right to comment further on the policy pending such information/consultation.

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.

The policy should be amended to align with emerging building regulations with 31% reduction above Part L 2013.

**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)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in 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:

TW control a majority proportion of the strategic site 'G2' Land at Whaddon. On behalf of TW, Black Box Planning request attendance at the hearing sessions to assist the Inspector with any queries or discussions regarding the site at Whaddon and to partake in general discussions regarding policy ES1.

**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.

9. Signature:

Date: