


**West Berkshire Local Plan Review 2022-2039**
**Proposed Submission Representation Form**
**Ref:**
*(For official use only)*

Please complete online or return this form to:	<b>Online:</b> <a href="http://consult.westberks.gov.uk/kse">http://consult.westberks.gov.uk/kse</a>
	<b>By email:</b> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
	<b>By post:</b> Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>4:30pm on Friday 3 March 2023</b>

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**PART A: Your Details**

*Please note the following:*

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:		Mr
First Name:*		Rob
Last Name:*		White
Job title (where relevant):		Director
Organisation (where relevant):	Bloor Homes Limited	White Peak Planning Ltd
Address* <i>Please include postcode:</i>		Didsbury Business Centre, 137 Barlow Moor Road, Didsbury, M20 2PW
Email address:*		[REDACTED]
Telephone number:		[REDACTED]

\*Mandatory field

**Part B – Your Representation**

***Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	White Peak Planning Ltd on behalf of Bloor Homes Limited
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	-
Policy:	See attached Table 1 (including Annexe 1).
Appendix:	-
Policies Map:	-
Other:	-

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes  No

*Please give reasons for your answer:*

N/A. Representations relate to plan soundness.

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	<b>Yes</b>	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		<b>No</b>
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		<b>No</b>
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		<b>No</b>

Please give reasons for your answer:

*The Strategy set out in the plan correctly focuses development towards Newbury, as the most sustainable location, and has carried forward the strategic housing allocation CS3 Sandleford Park from the Core Strategy, which accords with this approach. A number of policies are, however, inconsistent with NPPF requirements and may not result in deliverable development.*

*Further detail is set out alongside each separate policy representation in Table 1, attached.*

## 3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

### Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

*N/A Representations relate to plan soundness.*

#### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR 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.*

*Individual policy representations are set out in Table 1, attached.*

#### 5. Independent Examination

**If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)?**

Yes

Yes

No

*If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:*

*See Table 1.*

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

#### 6. Notification of Progress of the Local Plan Review

**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	Yes
The publication of the report of the Inspector appointed to carry out the examination	Yes
The adoption of the Local Plan Review	Yes

*Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.*

<b>Signature</b>		<b>Date</b>	<b>27.02.2023</b>
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**

**Table 1: West Berkshire Local Plan Review 2022-2039 Proposed Submission Draft (Reg 19) Representations on Behalf of Bloor Homes: Land at Sandlesford Park, Newbury.**

Plan Section	Draft Plan Legal	Draft Plan Sound	Duty to Co-operate achieved	Proposed Change	Request to Appear at EIP
Section 3.5 Strategic Objectives Housing SO 3		Y		<b>Support.</b>	No
SP 1 Spatial Strategy		N		<p><b>Object.</b> The policy is not consistent with national policy, justified or effective.</p> <p><b>Proposed change:</b></p> <p>“Within Newbury ... and Calcot, developments are expected to secure a net density of at least 35 dwellings per hectare... <b>unless it has been demonstrated that site constraints necessitate a lower density of development.</b></p> <p><b>Explanation:</b></p> <p>Paragraph 125 of the NPPF advocates the use of minimum density standards, where there is an existing or anticipated shortage of land for meeting identified housing needs. Paragraphs 127-136 provide guidance on the importance of good design to ensure that development is visually attractive, sympathetic to local character, and optimises the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space).</p> <p>Given that there is not a shortage of land to meet housing needs and much of West Berkshire District is valuable countryside, some flexibility should be introduced into the policy wording to ensure that sustainable development can be provided in sustainable locations which sits well within the landscape and reflects the constraints of each individual</p>	Yes. To explain and provide examples of how the plan cannot be effectively delivered without flexibility over density requirements.

				<p>development site. There needs to flexibility for density to be varied across a development site, particularly where it will be delivered in phases, to reflect site constraints.</p> <p>Blanket application of density requirements could also render the plan ineffective as it could prevent sustainable sites from being developed out due to protracted debate over application of the density policy.</p> <p>It is noted and supported that this caveat has been attached to the requirement for development on the edge of defined settlements to secure a net density of 30 dwellings per hectare.</p>	
SP3 Settlement Hierarchy		N	Y	<p><b>Support.</b> The focus on key urban areas, encompassing strategic sites allocated in Newbury, is supported.</p>	No
SP5 Responding to Climate Change		N		<p><b>Object.</b> Bloor Homes supports the Council’s objective to ensure development responds positively to the challenges of climate change but an amendment is required to Policy SP5 to ensure it is effective and, therefore, sound.</p> <p>Policy SP5 sets out the Council’s overarching policy with respect to climate change which directly supports the NPPF and specifically Paragraph 153, which states; <i>‘Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.</i></p> <p>Furthermore Paragraph 154(b) states; <i>‘New development should be planned for in ways that can help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government’s policy for national technical standards.’</i></p>	<p>Yes. To provide the Inspector with further explanation of the need for appropriate policy wording to ensure a deliverable approach towards the delivery of climate change resilient development in West Berkshire.</p>



			<p>In addition to a range of requirements which consider the climate resilience and adaptability of development, the Policy includes criteria c., d, and e., which relate to energy and carbon emissions.</p> <p>These are set out below:</p> <p><del>c. To achieve net zero operational carbon development by applying the energy hierarchy, achieving the highest viable levels of energy efficiency, generating and supplying renewable, low and zero carbon energy, and as a last resort carbon offsetting in accordance with Policy DM4;</del></p> <p><del>d. To achieve the highest viable levels of energy efficiency;</del></p> <p><del>e. To generate and supply renewable, low and zero carbon energy for its own use and/or local distribution networks in accordance with Policy DM4;</del></p> <p><b>Proposed amendment 1.</b>          Criterion c. should also be amended to reflect the reality that the energy solution for a site must be viable to be deliverable. This will assist in ensuring that the policy is effective as it will facilitate sustainable delivery of the development strategy for housing and other development set out in the plan.</p> <p>c. <b>Where viable and practical,</b> To achieve net zero operational carbon development by applying the energy hierarchy, <b>achieving the highest viable levels of</b> enhancing energy efficiency, generating and supplying renewable, low and zero carbon energy, and as a last resort carbon offsetting in accordance with Policy DM4;</p> <p><b>Proposed amendment 2.</b>          To ensure that SP5 provides an over-arching strategy policy approach to climate change and to provide consistency with the requirements of Policy DM4 (and Bloor Homes’ representations to DM4), criteria d. and e.</p>	
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			<p>of Policy SP5 should be removed. Criteria d and e are appropriately included in the more detailed climate change development management policy (DM4).</p> <p><del>d. To achieve the highest viable levels of energy efficiency;</del></p> <p><del>e. To generate and supply renewable, low and zero carbon energy for its own use and/or local distribution networks in accordance with Policy DM4;</del></p>	
SP12 Approach to Housing Delivery and Table 2.		Y	<p><b>Support.</b> The policy directs development to be located in accordance with Policies SP1 Spatial Strategy, SP3 Settlement hierarchy and DM1 Development in the Countryside. Table 2 in the reasoned justification includes the Sandleford Park site , setting out net units outstanding as 1580 homes.</p>	No
SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham		Y	<p><b>Support.</b> The policy specifies that the Sandleford Park Strategic Allocation is retained for “approximately 1500 dwellings”. This correctly directs development towards the most sustainable settlement in the district, in line with policies SP1 Spatial Strategy and SP3 Settlement Hierarchy. The estimated number of homes to be provided reflects detailed site assessment work undertaken by Bloor Homes on its site ‘Land at Sandleford Park’ and information in the public domain for the Sandleford Park West developer. Subject to the submission and grant of planning permission for Reserve Matters, the site is realistically deliverable within the plan period.</p>	No
SP16 Sandleford Park Strategic Site Allocation		N	<p><b>Object.</b> The policy is not justified or consistent with national policy.</p> <p>The Local Plan, in continuing to direct development to Sandleford Park, is consistent with the NPPF by proposing new development in locations that will achieve a sustainable pattern of development. Newbury, as the main settlement in the District is the most sustainable location and</p>	Yes. To explain the implications of the proposed amendments.

			<p>Sandleford Park is the most appropriate location for strategic housing delivery in Newbury (paragraph 6.49). Bloor Homes Ltd have secured outline planning permission (20/01238/OUTMAJ) for Land at Sandleford Park, the larger of the two Sandleford Park sites. Subject to submission and grant of planning permission for Reserve Matters, the site is realistically deliverable within the plan period.</p> <p>There are, however, a number of areas where the policy should be amended to ensure that the plan is sound.</p> <p><b>Proposed amendment 1.</b> Supporting <b>paragraph 6.55 should be deleted.</b></p> <p><del>6.55 Criteria for the delivery of the site are included in the policy above. As work on the LPR progresses, these will be further developed and refined to include any additional, specific, mitigation measures and infrastructure requirements identified by stakeholders engaging with the process.</del></p> <p>Now the plan is at an advanced stage of consultation, this caveat should be removed. The policy needs to be clear and sound, giving certainty to the developers.</p> <p><b>Proposed amendment 2.</b> Delete <u>A Minerals Resources Assessment will be provided for the site.</u></p> <p>The requirement for a Minerals Resource Assessment is not necessary. Detailed studies have shown that the winning of minerals would adversely impact on this sensitive site with ancient woodland and associated ground water regime. The requirement should be removed from the policy.</p>	
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			<p><b>Proposed amendment 3.</b> Sustainable Transport through routes connecting the A339, Monks Lane and Andover Road for pedestrians, cyclists and public transport <b>subject to agreement with bus operators.</b></p> <p>Additional wording is required to qualify the requirement for sustainable bus routes, as this is partly controlled by the bus operators. The extent to which Warren Road can be widened is limited, although the Manual for Streets does recognise that whilst streets on bus routes should not generally be less than 6.0 metres wide, this could be reduced on short sections with good inter-visibility between opposing flows. Therefore, the existing widening scheme can serve as a bus route subject to agreement with bus operators.</p> <p><b>Proposed amendment 4.</b></p> <p>Bloor Homes do have significant concerns with the requirement for the provision of: <i>“On-site renewable energy to assist in the delivery of a carbon neutral development;”</i></p> <p>In its current form, Bloor Homes believe that this aspect of draft Policy SP16 is unsound for the following reasons:</p> <ol style="list-style-type: none"> <li>1. The current Outline Planning Permission (OPP) does not require the development to be carbon neutral and therefore introducing such a requirement at this stage is unsound because at no point during the preparation or determination (including at the Public inquiry) was the requirement to be carbon neutral considered from a technical and commercial perspective.</li> <li>2. There are many different definitions of Carbon Neutral (some of which include embodied carbon) which are significant commercial and technical challenges which must be considered at the very outset of the design process. Sandleford is currently</li> </ol>	
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			<p>proceeding to Reserved Matters applications and therefore undertaking detailed design work.</p> <ol style="list-style-type: none"> <li>3. The request for 'on-site' renewable energy is also ambiguous and can refer to large scale renewable energy infrastructure, implementing this type of system would impact on land availability and could also lead to a reduction in housing delivery.</li> <li>4. The Outline Planning Permission for Sandford Park East is supported by a number of planning conditions which were agreed with the Secretary of State (SoS). These should therefore form the basis for the sustainability and energy strategy. No additional requirements should be introduced at this stage.</li> </ol> <p>To resolve the issues of soundness for Policy SP16, Bloor Homes consider that the most effective way to achieve this is to delete this requirement from Policy SP16 and replace it with the following text:</p> <p>"Development of the site will be expected to deliver:  <i>... On-site renewable energy to assist in the delivery of a carbon neutral development;</i>"</p> <p><b><i>'A sustainability and energy strategy in accordance with Condition 11 of the outline planning permission.'</i></b></p> <p>Infrastructure: The Policy refers to an Infrastructure Delivery Plan, but this is not appended to the consultation document. We reserve the right to make further representations in relation to this in due course.</p>	
SP16 Supporting paragraph 6.55			<p><b>Object.</b> The supporting wording is not justified or consistent with national policy guidance.</p>	

			<p>Supporting paragraph 6.55, which specifies that additional policy criteria will be added as the Local Plan Review progresses. Now the plan is at consultation stage, this caveat should be removed. The policy needs to be clear and sound, giving certainty to the developers.</p> <p>Remove paragraph 6.55</p>	
SP18 Housing Type and Mix		Y	<p><b>Support.</b> Reference to site specific viability (Criterion D) is welcomed. As a national-wide developer and promoter of Sandford Park, Bloor has a comprehensive understanding of the market and viability considerations. Consequently, it is well placed to proposed an appropriate mix and type of homes.</p>	No.
SP19 Affordable Housing		N	<p><b>Object.</b> The policy wording is not justified or consistent with national policy.</p> <p>Bloor Homes fully supports the Council’s objectives for delivering affordable homes given that we are currently experiencing a housing crisis for many thousands of people across the district and the UK who cannot afford to own or live in their own home.</p> <p>In relation to the requirement for affordable homes to be built to net zero carbon standards, the policy should align clearly with Policy DM4.</p> <p><b>Proposed amendment.</b>  <i>Affordable homes will be built <b>in accordance with the requirements of Policy DM4</b> to <del>net zero carbon standards</del> to help meet objectives on sustainability and climate change’.</i></p> <p><i>‘Affordable homes will be built to help meet objectives on sustainability and climate change’.</i></p>	Yes. To explain the adverse impact of the policy requirements on the delivery of affordable housing.

SP23 Transport		N		<p><b>Object.</b> The policy wording is not consistent with national policy or effective.</p> <p><b>Proposed amendment 1.</b> Mitigate any <del>adverse</del> <b>significant</b> impact on local transport networks and the strategic road network</p> <p>The amendment is proposed to be consistent with paragraph 110 (d) of the NPPF (2021). It is recognised that some adverse impacts on the road network are likely as a result of development: the NPPF is clear that it is significant impacts which require mitigation.</p> <p><b>Proposed amendment 2.</b> The policy refers to a document ‘Highway Design Guidance for Residential Developments’. To allow for updates to local design guidance, it is necessary to amend the wording. The wording should be amended to</p> <p><i>“Development Proposals should <b>refer to the guidance</b> set out in the Council’s Highway Design Guidance for Residential Developments <b>and or other relevant national guidance.</b>”</i></p>	Yes, to explain the extent of variation from national policy, which makes the policy unsound.
DM 19 Specialist accommodation i.e. The provision of new specialist forms of housing designed to meet the needs of those with identified support or care needs		N		<p><b>Object.</b> The wording is not justified or effective.</p> <p><b>Proposed amendment.</b> Specialist accommodation development will be sought as an integral part of the mix from the strategic housing allocations at Sandford Park and</p>	No.

			<p>North East Thatcham <b>subject to evidence of need and site specific viability.</b></p> <p>As currently worded this element of the policy is a little vague. The proposed amendment directs the decision maker and developer towards information required to appraisal the requirement for the provision of specialist accommodation.</p>	
<p>Policy DM4 Building Sustainable Homes &amp; Businesses</p>		<p>N</p>	<p><b>Object.</b> The policy as currently worded is not effective. A detailed note setting out Bloor Homes’ representations in respect of Policy DM4 is attached to this table as <b>Annexe 1. Policy DM4 Representations.</b></p> <p><b>Proposed amendments.</b> We would strongly recommend that the text is amended to include:</p> <p><b>POLICY DM4</b> <b>Building Sustainable Homes and Businesses</b> New development of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, including hotels (C1 use class), residential institutions (C2 use class) or Secure Residential Institutions (C2A use class) should achieve net zero operational carbon emissions (<del>regulated energy only</del>) by implementing the energy hierarchy. Proposals should demonstrate application of the energy hierarchy through submission of an Energy Statement or a detailed energy section within the Sustainability Statement in accordance with Policy SP5 and which identifies how the following minimum standards of construction are achieved to the greatest extent feasible and viable.</p> <p><b>1. Residential Development - minimum construction standard</b> A. New development of one or more new dwellings (C3 or C4 use class) will meet the following minimum standards of construction:</p>	<p>Yes, to provide the Inspector with further explanation of the need for appropriate policy wording to ensure a deliverable approach towards the delivery of climate change resilient development in West Berkshire.</p>



			<ul style="list-style-type: none"> <li>• <b><u>Prior to 2025 homes will meet the requirements of the Interim Future Homes Standard and deliver a 31% carbon reduction above Part L 2013.</u></b></li> <li>• <b><u>From 2025 homes will meet the requirements of the 2025 Future Homes Standard, maximising opportunities to reduce energy demand and carbon emissions through design,</u></b></li> </ul> <ul style="list-style-type: none"> <li>• Achieve the carbon Target Emission Rate set by the Future Homes Standard once this is confirmed by central government; in the meantime, achieve 63% reduction in carbon emissions is achieved by on-site measures, as compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2). These regulated carbon emission targets are to be achieved before the addition of on-site renewable electricity generation (which should subsequently be considered in section 3 of this policy); and</li> <li>• Equal to or less than 15kWh/m<sup>2</sup>/year space heat demand target, evidenced by the Building Regulations Part L-SAP Fabric Energy Efficiency metric.</li> </ul> <p>B. <b><u>Where feasible and viable</u></b>, new residential refurbishment developments of 10+ units will meet BREEAM Domestic Refurbishment Excellent as a minimum.</p> <p><b>2. New Non-Residential Development, hotels, residential institutions, secure residential institutions</b>  <b>- minimum construction standard</b>  <b><u>From 2025</u></b> new development of 100sqm or more of new non-residential floorspace, hotels (C1 use class), residential institutions (C2 use class) or secure residential institutions (C2A use class) will meet the following minimum standards of construction:</p> <ul style="list-style-type: none"> <li>• Appropriate to the building type, calculate a typical building baseline using a nationally recognised standard and demonstrate a percentage reduction in energy (regulated and unregulated) carbon emissions. These operational carbon emission targets are to be achieved before the</li> </ul>	
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			<p>addition of on-site renewable electricity generation (which should subsequently be considered in section 3 of this policy); and</p> <ul style="list-style-type: none"> <li>• BREEAM Excellent (BREEAM 2018 or future equivalent).</li> </ul> <p><b>3. Renewable Energy</b></p> <p>A. <b>From 2025</b> Subsequent to the achievement of the minimum construction standards under parts 1 and 2, new development of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, hotels (C1 use class), residential institutions (C2 use class) or Secure Residential Institutions (C2A use class) should include onsite renewable, zero and low carbon energy technologies to achieve net zero carbon operational energy (regulated and unregulated) on site.</p> <p>B. The Council will support proposals for renewable energy provided that the technology is:</p> <ol style="list-style-type: none"> <li>Suitable for the location;</li> <li>Not on the most versatile agricultural land (grades 1, 2 and 3a);</li> <li>Is accompanied by a landscape / visual impact assessment; and</li> <li>Would not cause harm to residential amenity by virtue of noise, vibration, overshadowing, flicker or other harmful emissions.</li> </ol> <p><b>4. Carbon Offsetting</b></p> <p><b>From 2025</b>, where a development proposal of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, including hotels (C1 use class), residential institutions (C2 use class) and or secure residential institutions (C2A use class) cannot demonstrate that it is net zero carbon in relation operational energy (regulated and unregulated), it will be required to address any residual carbon emissions for a period of 30 years through a cash in lieu contribution using a carbon offset cost of <b>£xxx</b> per tonne. Grid decarbonisation can be considered when calculating the offset cost.</p>	
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<p>Supporting Text to Policy DM4 Building Sustainable Homes &amp; Businesses</p>		<p>N</p>	<p><b>Renewable energy</b></p> <p>The use of deficiencies with the national grid as justification for greater renewable energy requirements on development sites is not appropriate and should be removed from the policy and supporting text. Furthermore we believe that alternative renewable energy options are prioritised ahead of CHP systems, with the Policy DM4 supporting text updated as shown below:</p> <p>Proposed Amendment 1.</p> <p><i>Examples of renewable energy technology include:</i></p> <ul style="list-style-type: none"> <li><i>(i) Micro-renewable technology, in particular solar water heating, ground and air source heat pumps, photovoltaic cells and biomass boilers.</i></li> <li><i>(ii) Large scale ground mounted solar PV systems; and</i></li> <li><i>(iii) Combined heat and power (CHP) with a modest plant being able to serve a large number of dwellings and commercial uses in a small geographical area;</i></li> </ul> <p><b>Carbon offsetting</b> – The evidence base does not include consideration of the unregulated energy as part of the carbon offsetting cost, it is assumed as a result that no allowance has been included in the viability assessment. Clarity is sought on whether unregulated energy has been properly considered to ensure the soundness of Policy DM4. Draft policy DM4 should also clearly state the carbon offset cost proposed and this should be included in the viability assessment.</p> <p>In addition the Council should clearly set out how the required carbon offset has been achieved, within a reasonable timeframe and suggest paragraph 10.32 is updated as below.</p> <p><i>'10.32 Funds raised through this policy will be ring-fenced and transparently administered by the Council to deliver a range of projects that achieve measurable carbon savings as locally as possible, at the</i></p>	<p>Yes, to explain the amendments needed.</p>
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				<p>same average cost per tonne. <b><i>Funds will be spent within 5 years of collection and returned to the developer.</i></b> The fund's performance will be reported in the Authority Monitoring report on: amount of funds spent; types of projects funded; amount of CO2 saved.'</p>	
Whole Plan Viability Assessment 2022		N		<p>Bloor Homes considers there to be a number of potentially significant omissions from the viability assessment that justifies Policy DM4 and, therefore, recommends that the Council reviews the assessment to ensure it is sound and meets the requirements of the NPPF and Planning Practice Guidance (PPG).</p>	<p>Yes, to explain the flaws in the assessment.</p>
Policy DM30 Residential Space Standards		N		<p><b>Object.</b> The policy wording is not effective.</p> <p><b>Proposed amendment.</b> The policy should be deleted.</p> <p>The policy should be deleted unless the Council have clear evidence that the requirements of the policy to deliver all new market and affordable dwellings, including from permitted development, change of use and conversion, to nationally described space standards, can realistically be delivered. Bloor Homes Ltd is concerned that the proposed approach may reduce the number of homes delivered and may not represent an efficient or sustainable use of land. Consequently, the policy is not deliverable or effective and renders the plan unsound.</p>	<p>Yes. To explain the implications of the policy as currently worded.</p>
Policy DM42 Transport Infrastructure		N		<p><b>Object.</b> The policy is inconsistent with the NPPF 2021, not justified or effective.</p> <p><b>Proposed amendment 1.</b> The word 'proportionate' before 'contribution' in the first paragraph of heading text should be retained. This should be included as it forms one of the tests as set out in paragraph 57 of the NPPF and Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010. The wording should remain as follows:</p>	<p>Yes, to explain the extent of variation from national policy, which makes the policy unsound.</p>

			<p><i>“Where required, new development will be expected to make a <b>proportionate</b> contribution to the provision or improvement of a range of transport infrastructure.”</i></p> <p><b>Proposed amendment 2.</b> To ensure that contributions to transport infrastructure provision meets the NPPF paragraph 57 tests, the following phrase should be added to criterion f.</p> <p><i>“f. New or improved passenger transport services, <b>where appropriate.</b>”</i></p> <p><b>Proposed amendment 3.</b> Development should not provide improvements to the operational capacity of the local road network unless they are necessary or the impact is severe. Unnecessarily building in capacity would encourage car use and be contradictory to other environmental policies.</p> <p><i>“g. Improvements to the safety and operational capacity of the local highway network, <b>where appropriate.</b>”</i></p>	
Policy DM44 Parking and Travel Plans 295		N	<p>Object. The policy is inconsistent with national policy and not effective.</p> <p><b>Proposed amendment 1.</b> For residential developments, the policy does not allow for site-specific circumstances to be taken into consideration contrary to Para 107 of NPPF. Para 57 states,</p> <p><i>“If setting local parking standards for residential and non-residential development policies should take into account: a) the accessibility of the development; b) the type, mix and use of development; c) the availability of and opportunities for public transport; d) local car ownership levels;</i></p>	Yes, to explain the purpose of parking standards and the extent of variation from national policy, which makes the policy unsound.

			<p><i>and e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles”.</i></p> <p>The zoning system for residential development set out in Policy DM44 is intended to address this to some extent but it does not sufficiently provide for the individual circumstances of a site to be taken into consideration. Additionally, the removal of the ‘exceptional circumstances’ line below the minimum standards table suggests no flexibility which is a concern when dealing with minimum standards.</p> <p>Wording should be inserted into the policy after the minimum standards table to allow for agreement on a case-by-case basis, as follows :</p> <p><b><i>A reduced residential parking standard may be accepted for sites in sustainable locations deemed suitable by the Council and based on evidence presented by the applicant.</i></b></p> <p><del>In general, I would question the use of minimum standards. Setting maximums would help to ensure that developments continue to come forward with levels of parking provision that remain commensurate with the vision to reduce car dependency and to promote alternative sustainable transport options. Nevertheless, NPPF does state that maximum parking standards for residential and non residential development should only be set where there is a clear and compelling justification that they are necessary for managing the local road network, or for optimising the density of development in city and town centres and other locations that are well served by public transport.</del></p> <p><b>Proposed amendment 2.</b></p> <p>The policy specifies that garages will not be counted as a parking spaces. There will, however, be circumstances where garages will be used for parking. To ensure the policy is justified and therefore sound, some flexibility should be introduced.</p>	
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			<p>The following amendment is proposed:</p> <p><del>Garages will not be counted as a car parking space for the purposes of meeting the required levels of parking set out in this policy.</del></p> <p><b>Garages will only be accepted as contributing towards parking provision for development if they have adequate functional space. Where garages are also used to provide cycle storage, additional space must be provided to accommodate this.</b></p> <p><b>Proposed amendment 3.</b>  <b>For Zone 2 residential developments, the policy does not specify whether half spaces are the minimum spaces</b> plus 1 unallocated space per X dwellings. This requires clarification in the policy wording.</p>	
Policy DM45 Travel Planning		N	<p><b>Object.</b> The policy is not justified.</p> <p>Monitoring is not compulsory once targets within travel plans have been met. The statement “<i>regular monitoring and reporting in line with the requirements of the council</i>” is, therefore, a concern without clarification as to what those requirements are.</p> <p>The policy should be amended to read as follows:</p> <p>Where developments are required to develop travel plan measures, it is expected that necessary targets will be ... and undertake regular monitoring and reporting <b>until the travel plan targets have been met</b> <del>in line with the requirements of the Council.</del></p>	<p>Yes, to explain policy wording which would ensure that travel plan monitoring is undertaken in a way which meets the NPPF paragraph 107 tests.</p>



## Annexe 1. Policy DM4 Response

Policy DM4 is clearly a very significant policy in terms of the Council's ambition to delivery net zero development as well as the commercial and technical implications for the delivery of much needed new housing and non-domestic buildings in the district.

Bloor Homes supports the Council's commitment to delivery of net zero housing however in its current form we do have significant concerns that the Policy is unsound and could lead to a reduction in the delivery of much needed private and affordable dwellings. Bloor Homes are very pleased to be able to share our thoughts with the Council to ensure the draft Local Plan can develop a sound and effective net zero policy.

Given the complexity of this issue it is inevitable that Policy DM4 contains a lot of detail however for the purposes of these representations we consider it helpful to summarise the main requirements of new buildings as part of draft Policy DM4:

- Minimum construction standards - Achieve the carbon Target Emission Rate set by the Future Homes Standard 2025 once this is confirmed by central government; in the interim (up to 2025), achieve a 63% reduction in carbon emissions through on-site measures, as compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2). These regulated carbon emission targets are to be achieved before the addition of on-site renewable electricity generation; and achieve a space heating demand of equal to or less than 15kWh/m<sup>2</sup>/year.
- Renewable energy - Subsequent to the achievement of the minimum construction standards include onsite renewable, zero and low carbon energy technologies to achieve net zero carbon operational energy (regulated and unregulated) on site.
- Carbon offsetting - Where a development proposal cannot demonstrate that it is net zero carbon in relation operational energy (regulated and unregulated), it will be required to address any residual carbon emissions by: a cash in lieu contribution.

It is noted that draft Policy DM4 is supported by an evidence base document which present the technical and financial information to justify the draft policy. Bloor Homes have carefully reviewed draft Policy DM4 and its supporting evidence base document and have a number of concerns and suggestions which, if addressed, would result in a sound and effective net zero policy. There are set out below:

**Minimum Construction Standards** – Bloor Homes supports the use of minimum construction standards and energy performance targets to enhance energy efficiency and minimise energy demand in new homes where this is feasible and deliverable.

The Government states in the executive summary of the 2019 FHS consultation<sup>1</sup> that the 2025 FHS provides Net Zero Ready homes which are future proofed and do not require retrofitting to operate Net Zero, 'We have said that from 2025, the Future Homes Standard will deliver homes that are zero-carbon ready. We intend to set the performance standard of the Future Homes Standard at a level which means that new homes will not be built with fossil fuel heating, such as a natural gas boiler. These homes will be future-proofed with low carbon heating and high levels of energy efficiency. No further energy efficiency retrofit work will be necessary to enable them to become zero-carbon as the electricity grid continues to decarbonise. Our work on a full technical specification for the Future Homes Standard has been accelerated and we will consult on this in 2023. We also intend to introduce the necessary legislation in 2024, ahead of implementation in 2025'.

With regards to the implementation and delivery of Policy DM4 it is assumed that the intention of the policy is its immediate implementation on adoption of the Local Plan. We believe that draft Policy DM4 is attempting to introduce an interim requirement above Building Regulations up until 2025 followed by implementation of the FHS 2025. This includes requiring homes to achieve a 63% carbon reduction above Part L 2021 (equivalent to the 2025 FHS), as well as a space heating demand target of 15kWh/m<sup>2</sup>.

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<sup>1</sup> <https://www.gov.uk/government/consultations/the-future-homes-standard-changes-to-part-l-and-part-f-of-the-building-regulations-for-new-dwellings>

The Government's 2019 FHS consultation response set out the rationale for implementing a staged approach to reducing emissions, largely in response to capacity and skills in the market to deliver the required changes, *'We must ensure that all parts of industry are ready to meet the Future Homes Standard from 2025, which will be challenging to deliver in practice, by supporting industry to take a first step towards the new standard'*. In particular the consultation response identifies potential issues in relation to requirements to scale up and upskill the delivery of heat pumps.

It is noted that Policy DM4 includes a requirement for homes to achieve a space heating demand equal to, or less than 15kWh/m<sup>2</sup>. Draft Policy SP5 and DM4 evidence base sets out the Council's ability to set policies which go beyond the Building Regulations through the Energy Act 2008 (Energy Act).

The space heating demand target within Policy DM4 is drawn from the Committee on Climate Change UK housing: fit for the future report<sup>2</sup> (2019) which states that new development should meet a space heating demand of between 15-20kWh/m<sup>2</sup> to contribute to meeting the Government's 2050 net zero target. It is the CCC's role to provide guidance to the Government who then sets out policy which in this instance has been the FHS 2025.

While it is correct the Energy Act currently makes an allowance for policies to go beyond the Building Regulations the 2019 FHS consultation, notes, *'as we move to ever higher levels of energy efficiency standards for new homes with the 2021 Part L uplift and Future Homes Standard, it is less likely that local authorities will need to set local energy efficiency standards in order to achieve our shared net zero goal.'*

The Government is planning on consulting on the 2025 FHS in 2023, as noted above it is the government's intention that the 2025 FHS delivers net zero ready homes through a consistent standard across England, and is the government's mechanism through which to meet the climate challenge set out by the CCC.

Introducing an interim requirement above current Building Regulations within the Local Plan and through draft Policy DM4 creates a very significant risk of introducing an undeliverable policy. Bloor Homes consider that such a Policy will have an adverse impact on the deliverability of new homes.

With respect to the cost of draft Policy DM4, the Whole Plan Viability Assessment 2022 tests a cost uplift of 5% for Policy DM4 which is significantly lower than the figure of 11% considered in the 2021 assessment and no evidence is presented to justify the use of this lower figure. The viability assessment also notes that consideration should be given to the longevity of the plan period, as well as avoiding setting higher costs in the short term. Bloor Homes considers this a reasonable statement to make however the Viability assessment then fails to consider the impact of bringing these requirements ahead of the 2025 FHS and the impact it may have on the deliverability of the policy and much needed private and affordable dwellings. Further concerns with respect to viability are raised below.

For the reasons set out above (including upskilling and availability of energy efficiency products and services, FHS consultation requirements, and viability) Bloor Homes believe that Policy DM4 should not introduce a mandatory interim requirement above Part L 2021 in advance of the FHS 2025 and amendments should be made to the policy to align with the Government's net zero strategy.

Further to the requirements for residential development set out above it is noted that a requirement is included for, *'New residential refurbishment developments of 10+ units will meet BREEAM Domestic Refurbishment Excellent as a minimum.'* There are a number of issues associated with placing specific requirements on refurbishment projects which are themselves unique and as above is not necessarily reflected in the viability assessment. We would recommend that this text is amended to include: **'Where feasible and viable New residential refurbishment developments of 10+ units will meet BREEAM Domestic Refurbishment Excellent as a minimum'**

**Unregulated energy** – Policy DM4 requires all operational energy, regulated and unregulated to be reduced, and then provided via low carbon renewable energy, or offset. While Bloor Homes supports the delivery of net zero homes it is considered this should be restricted to regulated energy only. As a housebuilder Bloor Homes only has the ability to influence the regulated energy demand of homes through design and specification of

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<sup>2</sup> <https://www.theccc.org.uk/wp-content/uploads/2019/02/UK-housing-Fit-for-the-future-CCC-2019.pdf>

materials and systems, and renewable energy technologies. The unregulated energy consumption, (often referred to as 'plug in load') of homes is ultimately the function of the residents use of the building, which cannot be influenced by the developer and therefore the requirement on the developer to offset emissions from residents unregulated energy use is not appropriate.

Post 2025 one of the greatest demands for unregulated energy in new homes will be to charge an electric vehicle. Bloor Homes considers it unreasonable to assume that they, as a housebuilder, should effectively meet the cost of mitigating carbon from a resident charging their electric vehicle.

Furthermore the Evidence Base notes the deficiencies in the current SAP modelling methodology around regulated energy, this also extends to unregulated energy. It is our experience that residents use of energy and therefore unregulated energy demand can vary dramatically, this has been brought into sharp focus with the current cost of living crisis. It is therefore likely that a prediction of unregulated energy will be highly inaccurate.

The points above are equally, if not more applicable to non-residential development. Large scale industrial and commercial development may have significant unregulated energy demands which are outside of the developers control to estimate and are likely covered by operators own Environmental Social Governance requirements.

**Risk of Delivery and Achieving Net Zero Homes** - The Policy DM4 Evidence Base includes details of the assessment of risks for a range of policy approaches. Of the four approaches considered two were initially discounted on the basis of not providing an adequate response to the effects of climate change. The two remaining options, Accelerating future stated national policy (Approach 3), and Acceleration + (Approach 4) were taken forward and ultimately Approach 4 was selected as the basis for Policy DM4. In reviewing the Evidence Base it is noted that the scoring of the risk of delivery for each options results in a risk of 76 for Approach 3 and 75 for Approach 4, out of a potential score of 200. Given how close the potential scores are a robust assessment would take forward both approaches for consideration further, including consideration of the viability implications of both options, this has not been done.

As noted following this assessment, Approach 4 has been taken forward, and as set out in the Evidence Base elements of this option considered have been modified, however, the resulting option has not been re-assessed to ensure its Risk score remains the same and in effect remains the preferred set of measures when compared to Approach 3. It is our view that given the alterations to this policy consideration be given again to the risk scoring of the Policy.

Prior to the adoption of Policy DM4 we believe further evidence needs to be gathered to consider the viability implications of both Approach 3 and 4 to provide a more robust consideration of which policy route is most applicable and ensure the assessment is sound and meets the requirements of the NPPF and Planning Practice Guidance (PPG).

**Renewable energy** – Bloor Homes supports the specification of low carbon and renewable energy technologies, however we would welcome clarity on the following points within draft Policy DM4:

- The evidence base sets out a rationale for generating energy onsite to support capacity issues with the wider national electricity network. Bloor Homes considers that it is not their responsibility to address deficiencies with the national grid network through measures on homes. As part of the development process, Bloor Homes will liaise with District Network Operators to ensure that all necessary legislative requirements for the supply of power to the site are met. We consider any requirements above this are not reasonable.
- The text supporting draft Policy DM4 identifies Combined Heat and Power (CHP) as a potential low carbon source. We would note that typically these operate as gas fired CHP systems currently and no longer represent a technically viable low carbon option given that the carbon content of gas is now significantly higher than that of grid supplied electricity. Alternative low carbon options for fuelling CHP systems at scale are largely untested. We would suggest that alternative renewable energy options are prioritised ahead of CHP systems.

**Carbon offsetting** – Bloor Homes broadly supports the addition of a mechanism to offset residual carbon emissions provided that the scope and cost of such a policy has been tested. We also support the recognition by the carbon offset policy of the decarbonisation of the electricity network and linking the offset payment to this. Notwithstanding this helpful inclusion we do have concerns that the policy does not clearly state the cost of carbon used by the policy and that this has not clearly been included within the viability assessment. While a potential cost is set out in the evidence base this has not followed through to the Policy. Furthermore, we are also concerned that the viability assessment does not currently include provision for unregulated energy offsetting and only includes an assessment of potential regulated residual emissions and cost. As noted in the evidence base unregulated carbon emissions can be 50% of a buildings energy use and it is therefore unclear whether this has been adequately considered as part of the assessment and clarity is sought to ensure policy soundness.

In addition to clearly setting out the costs the Policy needs to include reference to delivering the required carbon offset within a reasonable timeframe. It is noted in the supporting text an annual report will be prepared to demonstrate how the offsetting fund is spent, this should clearly show and confirm how the required carbon offset has been delivered. Furthermore the Council should set out its expectation on a timeframe for spending the funds collection, the evidence base notes that the National Planning Practice Guidance states, *'[S106] agreements should normally include clauses stating when and how the funds will be used by and allow for their return, after an agreed period of time, where they are not'* and, *'The Centre for Sustainable Energy notes that developers can ask for a refund of carbon offset payments that are unspent within 5 years.'* We would recommend the supporting text includes reference to the provision of a timeframe as above.

**Viability** – The viability of Policy DM4 is set out in the Whole Plan Viability Assessment 2022 which provides an uplift figure of 5% to meet the requirements of Policy DM4, with no evidence provided as to how this percentage has been calculated. The evidence base notes a report and discussions with Bioregional, however the report is not referenced, and information is not clearly presented within the evidence base. We would note that the 2021 Viability Assessment included a sensitivity analysis of a wider range of costs up to 11%.

As part of the lack of evidence as noted it is not clear whether the cost uplift includes an allowance for providing unregulated energy demand onsite, or whether this is included in the offsetting costs. The evidence base notes unregulated energy can be 50% of a buildings energy demand, this will likely only increase as homeowners switch to using electric vehicles. The evidence base also notes that the Building Regulations software for assessing unregulated energy demand is not accurate and could overestimate unregulated energy use and carbon emissions impacting on viability.

In addition to these points we believe greater consideration needs to be given to the potential impacts of inflation which will have increased the cost allowance significantly, even in the period since the preparation of the evidence base and viability assessment.

For the reasons as set out above, Bloor Homes considers there to be a number of potentially significant omissions from the viability assessment that justifies Policy DM4 and therefore recommends that the Council reviews the assessment to ensure it is sound and meets the requirements of the NPPF and Planning Practice Guidance (PPG).

**Summary** – In summary, Bloor Homes fully supports the Council's objectives to deliver net zero homes, however before the policy can be considered sound, additional work with respect to viability is recommended as well as amendments to draft Policy DM4. For clarity, Bloor Homes has summarised the amendments below and would be pleased to discuss these with the Council at the earliest opportunity:

**Minimum construction standards** – We believe that the requirements of Policy DM4 need to more closely follow the governments net zero strategy being put forward through the FHS. In this context we believe that bringing in requirements which go beyond the Building Regulations ahead of 2025 is premature, and has implications on the potential deliverability of the policy. In this context amendments are proposed to Policy DM4 to align with the interim FHS in the short term and 2025 FHS once implemented. For refurbishment of residential development consideration needs to be given to the feasibility and viability of delivering this requirement.

**Unregulated energy** – We believe the inclusion of unregulated energy and emissions is unreasonable and suggest the definition of operational net zero be amended to reference regulated energy only as shown below.

**Renewable energy** – We believe the use of deficiencies with the national grid as justification for greater renewable energy requirements on development sites is not appropriate and should be removed from the policy and supporting text. Furthermore we believe that alternative renewable energy options are prioritised ahead of CHP systems, with the Policy DM4 supporting text updated as shown below:

*Examples of renewable energy technology include:*

*(i) Micro-renewable technology, in particular solar water heating, ground and air source heat pumps, photovoltaic cells and biomass boilers.*

*(ii) Large scale ground mounted solar PV systems; and*

*(iii) Combined heat and power (CHP) with a modest plant being able to serve a large number of dwellings and commercial uses in a small geographical area;*

**Carbon offsetting** – The evidence base does not include consideration of the unregulated energy as part of the carbon offsetting cost, it is assumed as a result that no allowance has been included in the viability assessment. Clarity is sought on whether unregulated energy has been properly considered to ensure the soundness of Policy DM4. Draft policy DM4 should also clearly state the carbon offset cost proposed and this should be included in the viability assessment.

In addition the Council should clearly set out how the required carbon offset has been achieved, within a reasonable timeframe and suggest paragraph 10.32 is updated as below.

*'10.32 Funds raised through this policy will be ring-fenced and transparently administered by the Council to deliver a range of projects that achieve measurable carbon savings as locally as possible, at the same average cost per tonne. Funds will be spent within 5 years of collection and returned to the developer. The fund's performance will be reported in the Authority Monitoring report on: amount of funds spent; types of projects funded; amount of CO<sub>2</sub> saved.'*

**Viability** – The Whole Plan Viability Assessment 2022 provides no clear evidence as to the cost uplift used in the assessment of Policy DM4. It is recommended that the Council reviews the assessment to ensure it is sound and meets the requirements of the NPPF and Planning Practice Guidance (PPG).

Bloor Homes have presented a revised draft Policy DM4 below which we hope it is helpful to the council. We believe the draft Policy below will deliver net zero homes through a practical, viable and sound policy.

## Revised Policy DM4

### Building Sustainable Homes and Businesses

New development of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, including hotels (C1 use class), residential institutions (C2 use class) or Secure Residential Institutions (C2A use class) should achieve net zero operational carbon emissions (~~regulated energy only~~) by implementing the energy hierarchy.

Proposals should demonstrate application of the energy hierarchy through submission of an Energy Statement or a detailed energy section within the Sustainability Statement in accordance with Policy SP5 and which identifies how the following minimum standards of construction are achieved to the greatest extent feasible and viable.

#### 1. Residential Development - minimum construction standard

A. New development of one or more new dwellings (C3 or C4 use class) will meet the following minimum standards of construction:

- Prior to 2025 homes will meet the requirements of the Interim Future Homes Standard and deliver a 31% carbon reduction above Part L 2013.
- From 2025 homes will meet the requirements of the 2025 Future Homes Standard, maximising opportunities to reduce energy demand and carbon emissions through design,
- Achieve the carbon Target Emission Rate set by the Future Homes Standard once this is confirmed by central government; in the meantime, achieve 63% reduction in carbon emissions is achieved by on-site measures, as compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2). These regulated

carbon emission targets are to be achieved before the addition of on-site renewable electricity generation (which should subsequently be considered in section 3 of this policy); and

- Equal to or less than 15kWh/m<sup>2</sup>/year space heat demand target, evidenced by the Building Regulations Part L SAP Fabric Energy Efficiency metric.

B. **Where feasible and viable**, new residential refurbishment developments of 10+ units will meet BREEAM Domestic Refurbishment Excellent as a minimum.

## **2. New Non-Residential Development, hotels, residential institutions, secure residential institutions - minimum construction standard**

**From 2025** new development of 100sqm or more of new non-residential floorspace, hotels (C1 use class), residential institutions (C2 use class) or secure residential institutions (C2A use class) will meet the following minimum standards of construction:

- Appropriate to the building type, calculate a typical building baseline using a nationally recognised standard and demonstrate a percentage reduction in energy (regulated **and unregulated**) carbon emissions. These operational carbon emission targets are to be achieved before the addition of on-site renewable electricity generation (which should subsequently be considered in section 3 of this policy); and
- BREEAM Excellent (BREEAM 2018 or future equivalent).

## **3. Renewable Energy**

A. **From 2025** Subsequent to the achievement of the minimum construction standards under parts 1 and 2, new development of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, hotels (C1 use class), residential institutions (C2 use class) or Secure Residential Institutions (C2A use class) should include onsite renewable, zero and low carbon energy technologies to achieve net zero carbon operational energy (regulated **and unregulated**) on site.

B. The Council will support proposals for renewable energy provided that the technology is:

- i. Suitable for the location;
- ii. Not on the most versatile agricultural land (grades 1, 2 and 3a);
- iii. Is accompanied by a landscape / visual impact assessment; and
- iv. Would not cause harm to residential amenity by virtue of noise, vibration, overshadowing, flicker or other harmful emissions.

## **4. Carbon Offsetting**

**From 2025**, where a development proposal of one or more new dwellings (C3 or C4 use class) and/or 100sqm or more of new non-residential floorspace, including hotels (C1 use class), residential institutions (C2 use class) and or secure residential institutions (C2A use class) cannot demonstrate that it is net zero carbon in relation operational energy (regulated **and unregulated**), it will be required to address any residual carbon emissions for a period of 30 years through a cash in lieu contribution using a carbon offset cost of **£xxx** per tonne. Grid decarbonisation can be considered when calculating the offset cost.





**Our Ref: 2022.013**  
**Your Ref:**

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27<sup>th</sup> February 2023

Dear Sir or Madam,

**RE: West Berkshire Local Plan 2022-2039 Proposed Submission Draft Consultation**

I am pleased to provide you with representations to the West Berkshire Proposed Submission Draft Local Plan 2022-2039 Consultation on behalf of Bloor Homes Ltd.

These representations are made with reference to a site for which my client is the promoter and developer, known as 'Sandleford Park East'. The site falls within Proposed Local Plan Allocation SP16 Sandleford Park and is allocated in the adopted Core Strategy under Policy CS3. A site plan has been included in these representations for ease of identification (Location Plan Land at Sandleford Park).

In addition to its allocation, the site also has outline planning permission dating from May 2022. The permission is with all matters reserved except for access for up to 1,000 homes; 80 extra care housing units as part of the affordable housing provision, a new two-form entry primary school, expansion land for Park Housing Academy School, a local centre for commercial and community use, formation of new means of access onto Monks Lane, new open space including the laying out of a country park, drainage infrastructure, walking and cycling infrastructure and other associated infrastructure works (Planning Application Reference 20/01238/OUTMAJ).

Bloor Homes Limited are continuing to progress work on this site with a view to submission of a Reserved Matters planning application in due course.

**Representations**

I have set out representations on the attached West Berkshire Representation Form Sections A and B and accompanying Table 1, which sets out proposed changes and reasoned justification for each policy. Please do not hesitate to contact me if you require any clarification or additional information in respect of these representations.

Please note that I have provided these representations within the context provided by current national planning policy and guidance and the need to progress the Local Plan without delay.

Yours faithfully,




**Rob White**  
**Director**

**For and on behalf of White Peak Planning Ltd**



# Land at Sandleford Park Location Plan

## LEGEND

 Land at Sandleford Park (Sandleford Park East)

**PLAN NOT TO SCALE**

**BOUNDARY LINES ARE APPROXIMATE**



Client: Bloor Homes  
Project: 2022.013  
Scale: Not to Scale  
Rev: B