

# Hearing Statement – Matter 29 Climate Change (policy DP11).

## Tasley Garden Village.

On behalf of Bloor Homes Ltd and Taylor Wimpey UK Ltd.

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# TASLEY GARDEN VILLAGE

An architectural rendering of the Tasley Garden Village. The scene depicts a row of multi-story residential buildings with red-tiled roofs and light-colored facades. The buildings are interspersed with large, mature green trees. In the foreground, a paved walkway and a road are visible. A person is walking on the left, and a person is riding a bicycle in the middle ground. The overall atmosphere is bright and sunny, with a clear sky and long shadows cast across the ground.



## Document Management.

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# 1. Introduction.

- 1.1. Pegasus Group is instructed by Bloor Homes Ltd ('Bloor') and Taylor Wimpey UK Ltd ('Taylor Wimpey') to prepare Statements in respect of their land interests at Tasley Garden Village, Bridgnorth. Tasley Garden Village is identified as an allocation with the draft Shropshire Local Plan as a comprehensive mixed use sustainable urban extension (BRDO30), identified under Policy S3 – Bridgnorth Place Plan Area.
- 1.2. This Statement deals with Matter 29 Climate Change (policy DP11) which addresses the following issue:

***Issue – Whether the Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to climate change.***

## 2. Matter 29 Questions – Policy DP11 – Minimising Carbon Emissions.

2.1. The following provides a response to some of those questions identified in the Stage 2 Matters, Issues and Questions document (ID40). These are dealt with in the order that they appear within ID40.

### **1. Is the policy justified, effective and consistent with national planning policy?**

2.2. No. Part 2 of the policy and the specific requirement for non-residential development of 1,000m<sup>2</sup> of floorspace or over 1ha is not considered to be effective. This is because the current wording is unclear as to which developments will actually be required to achieve this in the case of larger developments that may be delivered in a phased manner.

### **2. Would implementing this policy affect the viability of sites – is it too onerous on developers?**

2.3. Our original representations (A0609) raised concerns in respect of how the specific requirement for non-residential development of 1,000m<sup>2</sup> or more to achieve BREEAM Excellent rating (or equivalent standard) had been tested through the Viability Study (EV115). These concerns remain given that the Viability Study has not been updated and noting that paragraph 8.23 of the Viability Study confirms that an increase to construction costs to allow for achieving BREEAM Excellent of 2% within the assessment. However, the same paragraph confirms that this increase can be as high as 5.5% with paragraph 11.8 of the Viability Study confirming that:

*'It is clear that the delivery of the employment uses is limited. We would urge caution in relation to setting policy requirements for employment uses that would impact on viability.'*

2.4. Notwithstanding this, the viability study is now over 4 years old and as such a Viability Note (GC49) has been prepared. However, this note does not mention or provide any information in respect of employment uses. As set out in the Viability Note, build costs have increased significantly since the Viability Study was prepared. Whilst this has been considered in respect of residential development and values, the Viability Note does not consider the impact on viability of non-residential development.

2.5. Build cost data will no doubt have significantly increased. However the Viability Study does not explain how the construction costs used in Appendix 18 have been arrived at other than the use of BCIS data, for example which categories in BCIS have been used. As such, it is not possible to provide a direct comparison with current BCIS build cost data.

2.6. Taking into account the fact that the BREEAM Excellent will add to this additional untested build cost, it is considered that this requirement has not been justified.



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