

Comment

Consultee	[REDACTED] (1277087)
Email Address	[REDACTED]
Company / Organisation	Abri Group LTD
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Abri Group LTD ([REDACTED] - 1277087)
Comment ID	PS44
Response Date	14/02/23 13:18
Consultation Point	Policy SP 18 Housing Type and Mix (View)
Status	Processed
Submission Type	Web
Version	0.2
Bookmark	Abri Group LTD

1. Do you consider the Local Plan Review is legally compliant?

Please see the guidance note for an explanation of what 'legally compliant' means

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

Positively Prepared: 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. . Yes

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . Yes

Effective: 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. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . Yes

Please give reasons for your answer

The amended text to this policy in relation to delivery of M4(3) wheelchair user dwellings is supported, however it is questionable whether this applies to major development only, and the wording on delivery against each tenure is ambiguous and should be amended for clarity.

The update to Table 3, now including recommended housing mix split by different affordable housing tenures is supported. This, together with the supporting text acknowledging that rigid application of the mix may not always be appropriate, is a useful tool in bringing forward mixed tenure development, and justified.

It appears that there is text missing from the end of paragraph 6.68 (clean version and 6.73 in the tracked change version).

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 Local Plan Review 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 amended text to this policy in relation to delivery of M4(3) wheelchair user dwellings is supported, however it is questionable whether this applies to major development only, and the wording on delivery against each tenure is ambiguous and should be amended for clarity.

All dwellings should be delivered as accessible and adaptable dwellings in accordance with Building Regulations M4(2). On developments of 10 or more dwellings around 10% of the new market housing and 10% of the affordable dwellings, up to a maximum of 5 units should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings unless evidence clearly demonstrates that this would be impracticable or make the scheme unviable.

The addition of the wording "*be impracticable or*" reflects the supporting text at paragraph 6.72 (clean version and 6.77 in the tracked change version), and is important given the practical, physical requirements of meeting M4(3) which may not be possible on all sites, or in the proposed housing mix.

It appears that there is text missing from the end of paragraph 6.68 (clean version and 6.73 in the tracked change version). This should be checked, and updated.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

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

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

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Abri Group LTD ([REDACTED] - 1277087)
Comment ID	PS45
Response Date	14/02/23 13:20
Consultation Point	Policy SP 19 Affordable Housing (View)
Status	Processed
Submission Type	Web
Version	0.3
Bookmark	Abri Group LTD

1. Do you consider the Local Plan Review is legally compliant?

Please see the guidance note for an explanation of what 'legally compliant' means

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Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . No

Effective: 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. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . Yes

Please give reasons for your answer

We note the inclusion of First Homes within this updated draft policy, and understand why this has been included. It is important to note that other local planning authorities, including Bath and North East Somerset Council and Guildford Borough Council, have identified the lack of affordability of First Homes within their communities and taken steps to prioritise other affordable housing tenures. In the case of B&NES Council due to the evidence demonstrating that First Homes is not affordable and would affect delivery of other affordable tenures, it has decided not to implement the national guidance and excluded the tenure from their policies and guidance. In the case of Guildford BC the emerging local plan policy H8 incorporates flexibility to deliver alternative affordable home ownership tenures where delivery of First Homes would “lead to an adverse planning outcome”.

The Updated Housing Needs Evidence (July 2022) demonstrates that First Homes will require additional discounts above the national figure of 30% to be affordable to people in housing need in West Berkshire, and these higher discounts will also prejudice the viability of delivering affordable rented housing. The introduction of First Homes as expected by the national guidance may reduce the opportunities for mixed tenure developments to meet local housing needs, contrary to national policy.

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We ask that the Council review whether the omission of the tenure, as supported by Bath and North East Somerset Council, or flexibility, such as that incorporated by Guildford Borough Council could be built into the policy to allow for different proportions of each tenure to be delivered in response to local need, affordability, and viability. A reduction in the level of First Homes required in the policy, or across individual sites, would protect the overall level of affordable housing being delivered. Flexibility within the policy would be justified by the evidence base.

5. Independent Examination

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6. Notification of Progress of the Local Plan Review

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The submission of the Local Plan Review for Independent Examination . Yes

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The adoption of the Local Plan Review . Yes

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Abri Group LTD ([REDACTED] - 1277087)
Comment ID	PS46
Response Date	14/02/23 13:23
Consultation Point	Policy DM 16 First Homes Exception Sites (View)
Status	Processed
Submission Type	Web
Version	0.2
Bookmark	Abri Group LTD

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is accommodated where practical to do so and is consistent with achieving sustainable development.

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence.

Effective: 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. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF.

Please give reasons for your answer

Point c of this draft policy (and text at paragraph 11.3) suggests that market homes should only be permitted where this will enable grant funding of First Homes, however grant funding is not available for the delivery of First Homes as this tenure is outside the Affordable Homes Programme. First Homes funding was available as part of the initial pilot scheme (First Homes Early Delivery Programme), but this has not been rolled out further.

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Point C of the policy, together with the text in paragraph 11.3, should be updated to remove reference to grant funding, to be effective.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? . No

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