



**West Berkshire Local Plan Review 2022-2039**  
**Proposed Submission Representation Form**

**Ref:**

*(For official use only)*

<b>Please complete online or return this form to:</b>	<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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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>*

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:	Miss	
First Name:*	Emma	
Last Name:*	Runesson	
Job title (where relevant):	Planning Manager	
Organisation (where relevant):	Ridgepoint Homes	
Address* <i>Please include postcode:</i>	Terriers House, 201 Amersham Road, High Wycombe, Bucks HP13 5AJ	
Email address:*		
Telephone number:	01494 781 950	

\*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):	Same as details above
---	-----------------------

**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Please refer to supporting covering letter.
Policy:	
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:*

We believe that the Plan accords with the requirements of the relevant legislation.
---

## 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	X	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<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	X	
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	X	

Please give reasons for your answer:

Please refer to supporting covering letter – we believe that certain policies are sufficiently justified.

## 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:

We believe that the Plan sufficiently addresses strategic planning issues relevant to the area.

#### 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.*

Please refer to supporting covering letter.

#### 5. Independent Examination

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

Yes

No

X

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

N/A

*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	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

*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>	22/02/2023
------------------	---	-------------	------------

**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**

# RIDGEPOINT HOMES

Planning Policy  
Development and Regulation  
Council Offices  
Market Street  
Newbury  
RG14 5LD

22<sup>nd</sup> February 2023

Dear Sir/Madam,

## **Re: West Berkshire Local Plan Review Proposed Submission (Regulation 19) Consultation**

We refer to the above Regulation 19 consultation and write to set out our comments upon certain of the draft policies and proposals. Accordingly, we have set out the policy headings below followed by our comments where applicable. The planning policies that we do not wish to comment on are not included.

Our comments are accompanied by the Proposed Submission Representation Form.

### **Representations**

#### **5 Our Environment & Surroundings**

##### ***Policy SP5 Responding to Climate Change***

Please refer to our comments on *Policy DM4 Building Sustainable Homes and Businesses* below.

##### ***Policy SP7 Design Quality***

Point c of paragraph 130 of the NPPF requires planning policies and decisions to ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities).

Accordingly, whilst we support the requirement to strengthen a sense of place through high quality locally distinctive design and place shaping, we do not consider it is appropriate to refer to the National Design Guidance (2021). We would suggest that local level design guidance is referenced and the now deleted design principles shown in the tracked changes version of the draft policy are re-inserted to ensure that design reflects local character, in accordance with the NPPF.

##### ***Policy SP8 Landscape Character***

Whilst we support the objective of conserving and enhancing the diversity and local distinctiveness of the landscape character of the District, we do not consider it necessary for an appropriate landscape assessment to accompany all proposals for development. This would add further cost to householder and



Registered Office: Ridgepoint Homes Ltd, Terriers House, 201 Amersham Road,  
High Wycombe, Buckinghamshire, HP13 5AJ  
Registered in England and Wales - 05907559  
Website: [www.ridgepointhomes.co.uk](http://www.ridgepointhomes.co.uk)



small-scale developments which could result in schemes being unviable. We therefore suggest that this requirement is amended to state “proposals for major development or in areas within or adjacent to protected landscape designations (i.e., the AONB) should be accompanied by an appropriate landscape assessment carried out in accordance with the current guidance from the Landscape Institute and IEMA Institute of Environmental Management & Assessment”.

## **Policy SP11 Biodiversity and Geodiversity**

We support the requirement to deliver Biodiversity Net Gain however we note that the required minimum gain will be imposed under the Environment Act 2021. This requirement is not yet in force, and it is expected to be required from November 2023. We therefore suggest that this policy is amended to state “development proposals will be required to demonstrate how they conserve and enhance biodiversity and/or geodiversity including their long-term future management and deliver Biodiversity Net Gain in accordance with the Environment Act 2021”. This would ensure that planning policy takes account of new and evolving requirements under the Act.

The sub-text of the policy in para 5.87 indicates that householder and minor applications would need to be supported by a Preliminary Ecological Appraisal. This would incur additional costs to planning applications for even small-scale developments which could result in such developments becoming unviable. We therefore suggest that para 5.87 is amended to require a Preliminary Ecological Appraisal to be dealt with via planning condition if the site is considered to be ecologically sensitive to avoid potentially abortive costs for small-scale applications in the event the proposals are considered unfavourably.

## **6 Delivering Housing**

### **Policy SP18 Housing Type and Mix**

We support the requirement for residential developments to contribute to the delivery of an appropriate mix of dwelling tenures, types, and sizes to meet the existing and future housing needs of all sectors of the community.

However, we disagree with the requirement for market dwellings on developments of 10 or more dwellings to reflect the mix set out in Table 3 of the draft Plan. We are of the view that the mix and size of market units should be determined by current market preferences as well as the location and size of the site, as set out in points a-d in the draft policy, rather than stipulating a specific blanket mix of dwellings to be applied to all sites. For example, an appropriate mix for an urban site in a town centre location would generally comprise smaller units whereas in a rural location the appropriate mix would generally comprise larger units.

We suggest that the requirement to reflect the market housing mix in Table 3 is deleted, with this mix applicable to affordable housing only, and points a-d in the draft policy remain as the considerations for determining the appropriate market housing mix.



We therefore suggest the policy wording is amended to state “*residential developments should provide a mix of unit sizes. The mix of affordable dwellings on all sites should reflect the requirements of Table 3 in the supporting text to this policy, or any more recent evidence published by the Council. The mix of market dwellings will have regard to [points a-d]*”.

In regard to accessible and adaptable dwellings, we disagree with the requirement for 10% of market units to be designed to M4(3) standards. This is an optional standard introduced by the Government, and we suggest that this should apply on a site-by-site basis to reflect the local need and demand for such market units. We therefore suggest that the requirement for M4(3) market units is deleted.

### **Policy SP19 Affordable Housing**

Whilst we acknowledge that affordable housing is a requirement, we do not support the amended wording for affordable housing to be “required” on sites as this does not offer sufficient flexibility to negotiate an alternative provisions or arrangements in exceptional circumstances, as noted in the following wording of the draft policy. We therefore suggest that the policy wording is reverted to “sought by negotiation” as shown in the tracked changes version of the draft Plan.

We do not support the requirement for affordable housing to be sought on sites of between 5 and 9 dwellings, as noted in point b in the draft policy, as this conflicts with paragraph 64 of the NPPF which states that the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas. In addition, the provision of affordable housing on such sites could become unviable for these smaller developments. We therefore suggest that point b is deleted.

We do not support the requirement for affordable homes to be built to net zero carbon standards. This should be reflective of the building regulations requirements, and we suggest that this requirement is deleted. Please refer to our comments in respect of Policy DM4.

Finally, whilst we support the requirement affordable homes to be appropriately integrated within developments, this can result in management issues for Registered Providers if affordable units are dispersed across the development. In our experience, it would typically be Registered Providers’ preference for affordable units to be delivered in clusters for ease of management. We therefore suggest that this requirement is amended to include a maximum cluster of 15 units houses and 21 units for apartments, taking account of the typical apartment block size.

## **10 Development Management Policies: Our Environment & Surroundings**

### **Policy DM4 Building Sustainable Homes and Businesses**

In regard to the minimum standards of construction for new development of one or more new dwellings set out under point A in part 1 of the draft policy, the first requirement notes that the Future Homes Standard has not yet been confirmed by central government and we understand it is currently envisaged that this will not be implemented until 2025. In the interim, the proposed requirement to achieve a 63%

reduction in carbon emissions compared to the baseline emission set by Building Regulations Part L 2021 is considered extremely onerous compared with the current Building Regulations which utilise 2013 as the baseline. This would result in developments having to reach very close to net zero carbon which is not a government target until 2050, beyond the new Plan period. In light of this, we do not consider it is appropriate to introduce new or enhanced requirements beyond Building Regulations at the time and achieving this would likely result in additional costs for developments.

We therefore suggest that the first requirement under point A in part 1 of the draft policy is amended as follows to reflect current Building Regulation requirements: *“achieve the carbon Target Emission Rate set by the Future Homes Standard once this is confirmed and implemented by central government; in the meantime, achieve a reduction in carbon emissions in line with current Building Regulations requirements at the time”*.

In regard to the second requirement under point A in part 1, the equal to or less than 15 kWh/m<sup>2</sup>/ year space heat demand target is unachievable. This would likely require different methods of construction to achieve this target which would ultimately result in additional costs that could impact development viability. We therefore suggest that this second point is deleted.

In respect of part 4 in relation to carbon offsetting, we suggest that the value per kg of Co<sub>2</sub> is established within the draft policy or supporting SPD's to provide certainty for developers in the costs of developments.

## 10 Development Management Policies: Our Environment & Surroundings

### ***Policy DM5 Environmental Nuisance and Pollution Control***

We acknowledge that developments should not lead to adverse effects on pollution of the environment however we do not support the requirement in points e and f of the draft policy with regard to tranquility, light spill and glare. These requirements may result in additional technical work for planning applications, in particular small-scale minor developments, which could add unnecessary additional costs and delays thus impacting the viability of development.

In addition, the requirement to preserve tranquillity of sites is reflective of the policy requirements in the AONB, as set out in draft Policy SP2. This is considered to be extremely onerous for development proposals outside of this protected landscape.

We therefore suggest that points e and f in this draft policy are deleted.

### ***Policy DM7 Water Resources and Waste Water***

With regard to the requirement in point b of the draft policy which references making efficient use of water through recycling measures, grey water recycling would likely to result in an average additional cost of £4,000 per plot for houses and £3,000 per plot for apartments as well as additional future maintenance and management costs. This could become unviable for certain developments whereas rainwater harvesting is easily achievable without any significant additional costs and typically forms part of SUDS



scheme. We therefore suggest that point b is amended to state “*measures such as rainwater harvesting and where feasible, grey water recycling*”.

### **Policy DM8 Air Quality**

Whilst we support the requirement for development to maintain, and where possible, improve air quality, we do not support point iii of this draft policy which requires an Air Quality Assessment for developments involving more than 100 parking spaces outside of an AQMA or 50 spaces within or close to an AQMA. Given the Council’s current and proposed parking standards, this requirement generally would apply to developments of a minimum of circa 30 units with 100 parking spaces or a minimum of circa 20 units with 50 parking spaces, subject to housing mix.

Government guidance states that air quality impacts may need to be considered for developments that would, inter alia, lead to changes in vehicle-related emissions in the immediate vicinity of the development or further afield. We do not agree that it could be reasonably said that developments of this size could result in significant changes in vehicle-related emissions as to justify the requirement for an air quality assessment based on parking provision only. We therefore suggest that point ii of this policy is deleted.

### **Policy DM15 Trees, Woodland and Hedgerows**

In regard to the requirements for the planting of new trees, woodland and hedgerows, we do not agree with point c which introduces a requirement to use native species wherever possible. We are of the view that species selection should be determined by the location, character and purpose of the proposed planting and in certain locations, different species may be considered more appropriate, as set out in points a, b, d and e. We therefore suggest that point c of the requirements for new planting is deleted.

## **10 Development Management Policies: Delivering Homes**

### **Policy DM30 Residential Space Standards**

We do not support the introduction of nationally described space standards for market housing. The size of market units should be determined by market preferences and the location of the site rather than stipulated unit sizes across the whole District. The requirement for market housing to be designed to these standards can also result in additional build costs due which may cause some developments to become unviable. We therefore suggest that Policy DM30 is amended to apply to affordable dwellings only.

### **Policy DM31 Residential Amenity**

In regard to the requirements for new residential developments, we do not support the requirement set in out in point iv which stipulates a garden size of at least a minimum of 10.5 metres in depth, where possible. We are of the view that garden sizes should be determined by the size of the associated property, the provision of open spaces on the development site and the provision and proximity of open spaces in the locality rather than a stipulated minimum depth. In addition, the varying design of house types may mean

that some dwellings are generally wider units and as a result benefit from wider gardens. Sufficient garden sizes may therefore be achievable with shorter garden depths so it would not be appropriate to apply minimum depths.

We therefore suggest that point iv is amended to state that “a garden size which is commensurate with the size of the property, taking into consideration the provision and proximity of on-site and nearby public open space”.

In regard to point v, we do not support the requirement for a minimum distance of 21m between habitable room windows for all separation distances. Where this relates to front-to-front relationships, whilst street widths vary depending on the role of the street, the width may typically be circa 9m therefore the 21m requirement could significantly impact site layouts and the character of street scenes. In addition, if this separation distance is applied to a back to side relationship, this could significantly impact site layouts and could result in the inefficient use land, contrary to paragraph 124 of the NPPF.

We therefore suggest that point v should be amended to state “a minimum back-to-back distance of 21 metres between directly facing windows, serving habitable rooms, subject to design and layout”.

## 12 Development Management Policies: Fostering Economic Growth and Supporting Local Communities

### **Policy DM40 Public Open Space**

We do not support the absolute requirement for the provision of public open space for developments of 10 dwellings or more. We are of the view that this should be assessed based on the site’s local context with regard to the availability, quality and proximity of existing nearby open spaces, including the considerations set out in points a-g in the draft policy. We therefore suggest that the draft policy is amended to state “proposals for residential development of 10 or more dwellings should provide high quality public open space, subject to the considerations set out in points a-g”.

We also suggest that the commentary on public open space in the sub-text of the policy includes an acknowledgement that blue infrastructure (ponds, lakes, rivers etc) is considered as part of the public open space assessment. Such infrastructure can offer a variety of recreational and leisure roles and can form a positive role in new developments.

### **Policy DM42 Transport Infrastructure**

We do not support the proposed wording for the provision of electric charging points as set in point i of the draft policy. As this does not stipulate a specific provision, it is ambiguous and may cause confusion and uncertainty for developers. The requirement for electric vehicle charging points is addressed by Building Regulations so we suggest that this policy is amended to refer to the latest Building Regulations to take account of current and future requirements. This would reflect the proposed wording of Policy DM44.

In addition, it may be not feasible to provide a high provision of charging points on certain sites as in some locations there may be insufficient capacity in the electricity network to support this. Greater flexibility should be incorporated into this policy to address possible constraints of specific sites in accordance with Building Regulations.

We therefore suggest that point i of this policy is amended to state “*provision of electric vehicle charging points and/or associated infrastructure to future proof provision in accordance with the latest building regulations requirements, where feasible*”.

### **Policy DM44 Parking**

We support the inclusion of the reference to Building Regulations with regard to the provision of electric vehicle charging points.

In regard to the parking standards, it is not physically possible to deliver 0.5 of space per unit in isolation and therefore the parking standards as drafted may cause confusion and ambiguity for developers.

We suggest that additional commentary is included to specifically confirm that the delivery of a 0.5 space can be achieved through shared spaces. Alternatively the parking provision could be delivered on aggregate across a whole development i.e. 1 dwelling provided with 3 spaces and 1 dwelling provided with 2 spaces to equate to 2.5 spaces per unit overall.

The commentary on Travel Plans is a duplicate of the wording of Policy DM45 so this should be deleted.

### **Policy DM45 Travel Planning**

Paragraph 113 of the NPPF requires all developments that will generate significant amounts of movement to provide a travel plan. The requirement to provide travel information pack for developments of 10 or more dwellings conflicts with this as it cannot be reasonably said that a development of this scale will generate significant amounts of movement.

In addition, the preparation of travel information packs for smaller development would result in additional costs and delays which could render the development unviable.

We therefore suggest that this section of the draft policy is deleted.

## **Appendix 5 Residential Parking Zones**

In reference to the Residential Parking Zone - Pangbourne, Theale and Eastern Settlements map, we suggest that Zone 1 in Theale is extended westwards to include the site at “Lakeside, The Green, Theale”. A Location Plan of the site is enclosed for reference.

The site benefits from an extant outline planning permission for up to 325 units (ref: 15/02842/OUTMAJ) as well as an extant detailed permission for 350 units (ref: 04/01219/FULMAJ). Both of these applications

# RIDGEPOINT HOMES

introduce a requirement to deliver a pedestrian and cycle route to Station Road. This would therefore reduce journey times to the station and enhance the sustainability of the site, justifying reduced parking standards.

## Summary

We trust the above comments are of assistance in preparing the Local Plan Review and we await confirmation of receipt and registration of our representations in due course.

Yours faithfully,



**Emma Runesson MRTPI**  
**Planning Manager**  
**T - 01494 781968**



*Registered Office:* Ridgepoint Homes Ltd, Terriers House, 201 Amersham Road,  
High Wycombe, Buckinghamshire, HP13 5AJ  
Registered in England and Wales - 05907559  
*Website:* [www.ridgepointhomes.co.uk](http://www.ridgepointhomes.co.uk)

