


**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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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:*		GEOFF
Last Name:*		ARMSTRONG
Job title (where relevant):		DIRECTOR
Organisation (where relevant):	MANOR OAK HOMES	ARMSTRONG RIGG PLANNING
Address* <i>Please include postcode:</i>	C/O AGENT	██████████ ████████████████████ ██████████ ██████████
Email address:*	C/O AGENT	████████████████████
Telephone number:	C/O AGENT	██████████

\*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):	GEOFF ARMSTRONG, DIRECTOR, ARMSTRONG RIGG PLANNING ON BEHALF OF MANOR OAK HOMES
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	11.4 – 11.10
Policy:	Policy DM17
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:*

## 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>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		
<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>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:

See covering letter

## 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:

#### 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.

See 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

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

To participate in the debate on this topic.

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.

Signature		Date	03/03/2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

Ref: GA/DJ/00620/L0004

3<sup>rd</sup> March 2023

Sent by email to [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk)

Planning Policy Team  
Development and Regulation  
West Berkshire Council  
Council Offices  
Market Street  
NEWBURY  
RG14 5LD

Dear Sir / Madam

**Representations to West Berkshire Local Plan Review Proposed Submission Consultation  
Policy DM17 – Rural Exceptions Housing  
On behalf of Manor Oak Homes**

We are writing on behalf of Manor Oak Homes to make representations to the West Berkshire Local Plan Review Proposed Submission (Regulation 19) Consultation. Our client's representations are set out in this letter and on the enclosed comments form.

**Representations**

Our client's representations concern **Policy DM17 – Rural Exceptions Housing**. Our client is currently working with East Ilsley Parish Council to bring forward an exception site to meet local need in the village identified through a Housing Needs Survey (HNS). In addition to identifying a need for affordable dwellings, the East Ilsley HNS also identifies a significant need for smaller 2-3 bedroom market dwellings. In fact, the need for market housing for local people in the village is demonstrably greater than the need for affordable housing and many responses to the HNS expressed support for modest sized dwellings for private sale to meet a real shortage in the village.

The shortage of smaller dwellings for private sale in East Ilsley is backed up by census data (2011 Census - Table LC4405EW) which shows that 51% of all owned dwellings (i.e. excluding affordable and private rental) in the village have 4 or more bedrooms. This compares to a figure for West Berkshire as a whole of 37% dwellings with 4 or more bedrooms. The shortage of smaller dwellings for private sale has a significant impact locally on the demographic balance of the village and the ability for people who grew up in the village to remain living there in adulthood. The Council's Housing Background Paper (January 2023) identifies a need for 85-90% of all new market dwellings to have fewer than 4 bedrooms and yet the Local Plan Review includes no way for market dwellings to be delivered in villages like East Ilsley to meet the clear need for a more balanced housing stock.



The only way for market housing to currently be delivered is as small scale development within the settlement boundary (which is far more likely to deliver larger dwellings that are not needed) or on rural exception sites, but only if it is required to make the scheme viable. There is no policy allowance in the local plan for the delivery of homes for private sale to meet an identified local need.

At paragraph 62, the NPPF states that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. This would include people living in an area who wish to stay in the area but who do not qualify for affordable housing and are unable to meet their housing needs due to a shortage of suitable homes for private sale. In the context of East Ilsley, the Local Plan Review currently fails to meet an identified need for smaller market dwellings for local people and it is therefore not consistent with national policy and cannot be considered sound.

In order to make the Local Plan Review sound, we consider that **Policy DM17** should be amended to allow for the delivery of market housing to meet a specific local need identified through a Housing Needs Survey. We are not advocating for a relaxation of normal development controls to allow any form of market housing outside of settlement boundaries, but rather for the delivery of dwellings for private sale when there is specific evidence of a local need, where the dwellings are secured for local people and where schemes would also meet the identified need for affordable housing.

We have experience of similar policies elsewhere in the country that allow for the delivery of market housing as part of the mix on exception sites (without a requirement to demonstrate viability requirements) and consider that the following proposed changes would ensure that Policy DM17 can be considered sound.

### ***Policy DM17***

#### ***Rural Exception Housing***

*Small scale rural exception housing schemes will be supported adjacent to rural settlements to meet a local housing need. Such schemes will be expected to be in response to a need identified through a local needs survey for a parish or group of parishes. The affordable housing within the scheme will be required to remain affordable in perpetuity.*

*It is expected that rural exception housing schemes will **focus on the delivery of ~~deliver 100%~~ affordable housing.** In some cases, a proportion of market housing may be acceptable where this **either** enables the closing of a funding gap for the delivery of the affordable housing within the scheme **or it would meet a specific identified need for market housing.** The market homes should be integrated with the affordable homes to form a single scheme.*

*Where market housing is being used to financially support a rural exception housing scheme, the following detailed evidence is required:*

- a. A financial appraisal demonstrating the viability of the scheme and the financial relationship between open market and affordable housing;*
- b. The measures being taken to ensure the use of the affordable housing is to meet local needs in perpetuity; and*
- c. The relationship of open market housing to meeting local need, in terms of location, design, visual character, and type of accommodation.*

**Where market housing is proposed to meet an identified unmet need on a rural exception housing scheme, the following detailed evidence is required:**

- d. The need for new homes for private sale must be identified through a local needs survey;**

- e. The dwellings must be secured for local people living or working in the parish or people with close relatives in the parish. This will be achieved by requiring each dwelling to be marketed to people with a local connection only for a period of 6 months at a maximum price set by taking the average of two independent valuations; and
- f. The proposed development must demonstrate that any need for affordable housing identified in the local needs survey is also met.

We trust these representations will be given due consideration in the examination of the Local Plan Review and we look forward to participating further in due course. In the meantime, if you have any questions please don't hesitate to contact me.

Yours sincerely



Geoff Armstrong / [Redacted]  
**Director**  
**Armstrong Rigg Planning**

