

Comment

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Ian Bacon (1335096)
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Consultation Point	Policy DM 4 Building Sustainable Homes and Businesses (View)
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Bookmark	Bacon, Ian

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. . 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. . Yes

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

How has the 63% uplift over current Part L standards been arrived at. This is strange figure and mirrors no other Local Plans that I am aware of.

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

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

Yes

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.

As a highly experience Part L of the Building Regulations (SAP) Assessor of many years standing I fail to understand or agree with the policy under the first bullet point of Section 1 under Policy DM4.

The uplift figure of 63% appears to be entirely arbitrary and in my experience will be very difficult and in many cases, impossible to deliver without the addition of renewable electricity generation equipment onto a dwelling.

I suspect that this a move to push all dwellings to install an Air Source Heat Pump (ASHP) for their heating, alongside a tight fabric specification (which is of course correct), however ASHPs are not suitable in all instances, particularly smaller dwellings, where the more logical approach is to minimise heating need through energy efficient fabric, supply heating by direct electric sources and offset with Solar Photovoltaics (PV - renewable electricity generation).

It becomes increasingly difficult to design out energy requirements from UK housing and this will seriously affect the financial viability of house building. In my opinion, the UK Government is rightly 'greening' the National Electricity grid and it will be this that picks up the slack once dwellings have gone as far as is reasonably practical.

By all means set an uplift figure, but lets have one similar to other LPAs and not one that seriously limits the flexibility of housing to meet the increasingly stringant Building Regulations.

The adoption of this policy, which appears ill thought out and to have not taken adequate technical advice, will see even more time wasted for all parties as they too and fro over its inapplicability.

Section 2 states a BREEAM requirement. I am also an experience BREEAM assessor and have undertaken a number of projects in West Berkshire. This is a continuation of the current policy and it is fair to say it hasn't been working, with many projects successfully appealing and downgrading to a Very Good requirement.

Again, this is a waste of the planning department and developers time and whilst all schemes are different, BREEAM has to be applied in a sensible manner and not as a blanket requirement.

Time, effort and resource would be saved if the 100m/sq limit (just for the BREEAM requirement) was raised to 1,000m/sq - at this point I would say you would see far less need to downgrade, for despite what is often claimed, real experience shows that larger projects are more suited to higher BREEAM ratings (but again, not always).

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

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|---|--------------------------|-----|
| The submission of the Local Plan Review for Independent Examination | <input type="checkbox"/> | No |
| The publication of the report of the Inspector appointed to carry out the examination | <input type="checkbox"/> | Yes |
| The adoption of the Local Plan Review | <input type="checkbox"/> | Yes |