

Dear Verity

I have been through the programme, and confirm Yate Town Council will wish to participate as scheduled on items

PSP4/5
PSP31
PSP2/17
PSP27

We will no longer need to appear on the following, and make the following comments instead of oral evidence to affirm and clarify our representations.

- PSP6 - Yate Town Council has submitted objections to the revision SM11 but no longer needs to appear to further present those representations
- PSP47 - Yate Town Council no longer needs to appear as SM60 addresses this concern adequately.
- PSP3 - Yate Town Council no longer needs to appear as SM9 revisions to paragraph 3.33 address our concerns adequately
- PSP16 - Whilst Yate Town council remains concerned, we have expressed our concerns, and do not need to be present to give oral evidence on this item. Either the inspector accepts that disability parking is not as flexible as other parking or the inspector does not. We believe the only way to pay attention to the needs of accessible parking is the provision of a specific table, independent of the figures for other parking. Figures for other parking rightly depend on the location and the availability of public transport. Accessible parking for those with mobility needs is not dependent in that way. However oral evidence will not add to the point. We therefore no longer wish to appear on this item, but ask the Inspector to consider our concerns.
- PSP42 Custom Build dwellings. Yate Town Council maintains our objection to the requirement for affordable housing within cooperative schemes. We have not objected to the requirement for provision of affordable housing on other self or custom build schemes, our concern is in relation to co-operative housing, which is based on a concept of mutual ownership between all those involved, and is used to provide affordable housing for those involved. The additional provision of affordable housing for people who have not formed part of the co-operative effectively precludes the adoption of a co-operative model. We suggest instead of providing affordable housing for a third party to rim, or off site funding, the objectives of affordable housing could be met by insisting that within a co-operative scheme a proportion of the properties, equivalent to the AH number must be available at a cost equivalent to an affordable housing property. This enables the properties to remain within the scheme, but deliver affordable housing. A revision to the text to reflect this alternative means

of providing affordable properties will mean cooperative schemes can be developed. We do not consider we need to be present at the inquiry to make this point.

- PSP39 HMOs, residential conversions and subdivisions. Yate Town Council considers SGC response inadequate and asked the Inspector to consider the written objections. It does not oral evidence will add to its representation of its concerns. SGC says PSP 8 addresses the problems Yate Town Council has raised. This does not deal with the regulation of conversions which may be covered by the GPDO. We need these sorts of amenity standards to be applied explicitly to conversions that are permitted development. The parking standards PSP 16 and Chapter 4 of the residential parking standards SPD Dec 2013 para 4.3 provide only limited protection to local amenity as e.g. it allows for on street parking, unless there is already evidence of parking problems. In many cases there is not a problem until subdivision occurs – we think for example of Abbotswood where several flats were all converted to HMOs. We are concerned that in parts of Yate the conversion of small terraced housing or flats into HMOs with 6 people is not regulated under GPDO yet is causing significant problems, of parking in particular. There is in particular a cumulative problem. We therefore argue that PSP 39 should be extended to regulate conversions where adequate off street parking cannot be provided. The current policy does not do that. The figure of 0.5 spaces per bedroom is inadequate where three bed houses are being converted into 5 or 6 unit HMOs, often generating 5 vehicles, but this would only require 3 parking spaces. We ask the Examination to consider this problem, and recommend that PSP39 be tightened to regulate all HMO development in Yate.

Chris Willmore

Cllr, Yate Town Council