

APPENDIX 2

Consultation on the West Berkshire Local Plan Review 2022-2039 Proposed Submission under Regulation 19

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- M Main issues arising from the Proposed Submission LPR consultation - Introduction Context Vision and Objectives
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- O Main issues arising from the Proposed Submission LPR consultation – Site allocations
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1. Introduction

In January 2023 the Council published the Proposed Submission version of the LPR for public consultation from 20th January 2023 to 4:30pm on 3rd March 2023.

2. Bodies and Persons Consulted

All of the bodies and persons included on the Planning Policy consultation database were notified by email or letter and invited to comment. The notification letter/email, Statement of Representations, comments form and accompanying guidance note are attached in Annex L. The Proposed Submission LPR and all supporting documents were published on the Council's website and were also available to view at the Council's offices in Market Street, Newbury.

3. Keeping People Informed

A range of channels were used to communicate key information about the Regulation 19 Proposed Submission consultation. These included: press releases, Council central communications, planning communications, social media and email distribution to parish and town councils.

| W/C | Resident Bulletin | LPR Bulletin | Social Media | Press Release |
|------------------|-------------------|--------------|--------------|---------------|
| 16 January 2023 | | ✓ | ✓ | ✓ |
| 23 January 2023 | ✓ | | ✓ | |
| 30 January 2023 | ✓ | | ✓ | |
| 6 February 2023 | ✓ | | ✓ | |
| 13 February 2023 | ✓ | | ✓ | |
| 20 February 2023 | ✓ | | ✓ | |
| 27 February 2023 | | ✓ | ✓ | |

On the commencement of the consultation a press release was issued and distributed to local media outlets including Newbury Weekly News, BBC Berkshire, Penny Post and Get Reading. Prior to the commencement of the consultation a number of previous press releases had also been issued.

An LPR bulletin, distributed via email to approximately 2,300 people, was established for those that wanted to learn more. The bulletins provided updates on key milestones, contained factual updates on the LPR, included links to find further information and during consultation contained information on how to submit a representation.

The consultation was advertised for five-weeks in the West Berkshire residents e-bulletin. The bulletin has approximately 22,028 subscribers and a typical open rate of approximately 59%.

Tweets were also issued by the Planning Services Twitter account and the West Berkshire Council Twitter account throughout the Regulation 19 consultation.

4. Proposed submission consultation

a) Number of responses

In total, 1710 individual representations were received from 690 consultees on the West Berkshire Local Plan Review 2022-2039 Proposed Submission. Of those, 18 responses were submitted late, following the close of the consultation.

Once the representations were received, they were logged and processed and, at the end of the consultation period, made available to view on the Council's Local Plan Consultation Portal <https://consult.westberks.gov.uk/kse>

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| Policy RSA4 Land off Greenham Road, South East Newbury | 2 |
| Policy RSA5 Land at Lower Way, Thatcham | 5 |
| Sites Allocated for Residential Development: Eastern Area | |
| Policy RSA6 Stoneham's Farm, Long Lane, Tilehurst | 3 |
| Policy RSA7 72 Purley Rise, Purley on Thames | 2 |
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| Policy RSA9 Land between A340 and The Green, Theale | 9 |
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| Policy RSA11 Former Theale Sewage Treatment Works, Theale | 33 |
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| Policy RSA16 Land North of Southend Road, Bradfield Southend | 3 |
| Policy RSA17 Land at Chieveley Glebe, Chieveley | 13 |
| Policy RSA18 Pirbright Institute Site, Compton | 5 |
| Policy RSA19 Land west of Spring Meadows, Great Shefford | 9 |
| Policy RSA20 Land off Charlotte Close, Hermitage | 4 |
| Policy RSA21 Land to the south east of the Old Farmhouse, Hermitage | 6 |
| Policy RSA22 Land adjacent Station Road, Hermitage | 6 |
| Policy RSA23 Land adjoining The Haven, Kintbury | 6 |

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| Policy DM11 Non-designated Heritage Assets | 5 |
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| Policy DM18 Self and custom build housing | 4 |
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| Policy DM22 Residential use of space above non-residential units | 1 |
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| Policy DM24 Conversion of existing redundant or disused buildings in the countryside to residential use | 8 |
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| Policy DM26 Extension of residential curtilages in the countryside | 0 |
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b) Summary of the Main Issues

A summary of the main issues raised under each of the consultation points is set out below. A more detailed summary of the main issues raised in the representations are included within Annexes M to Q. Copies of the full submissions can be viewed on the Council's Local Plan Consultation Portal at:

<https://consult.westberks.gov.uk/kse/event/35924/section/>

1. Introduction and Background

Support was expressed for the level of detail and amount of work included and the clarity and accessibility of the documentation, particularly the supporting information.

There were a number of objections:

Duty to Cooperate:

- There were relatively few issues raised about the duty to co-operate process, although several developers and promoters of sites as well as the Home Builders Federation referred to the outstanding unmet need from Reading not being catered for by allocations in the LPR.
- Reading Borough Council supports the WBC approach and considers it has met the duty to co-operate requirements.
- Several other local authorities have said they cannot assist WBC to meet its identified office and industrial needs.
- The approach to dealing with Gypsy and Traveller needs is accepted by several councils.
- One council has concerns about the shortfall in provision for employment, gypsy and traveller pitch provisions, and how restrictions relating to the AWE are applied to the borough

The timing of consultation and decision-making process:

- It is illogical and reckless to progress the Plan until changes to national policy are finalised. Artificial deadlines mean the Plan is being rushed through.
- Decision-making is undemocratic by failing to secure full Council sign off before Submission
- There is no record of consultation on the Housing & Economic Land Availability Assessment (HELAA) January 2023 and it was not available to Councillors when the decision to launch the Regulation 19 consultation was made
- The Air Quality Assessment, Employment Background Paper, Flood Sequential Test Report and Housing Background Paper were not finalised or published until after final decisions were taken on the strategy and proposed allocations.
- The Plan is unlikely to be adopted by 2024 so to ensure the plan period is consistent with national policy an extra year should be added to the plan period

HELAA and Site Selection:

- Numerous points from the HELAA are poorly summarised or not included in the site assessments.
- A Site Selection Background Paper was not published as part of the Regulation 19 consultation.

- Some evidence base for the HELAA is now dated.
- It is puzzling that Siege Cross was resisted by WBC in an earlier appeal and now is being promoted for a significantly larger scheme.

SA/SEA

- There is an inadequate assessment of reasonable alternatives
- The assessments made of the impacts and benefits of the allocation of North East Thatcham against the sustainability objectives are seriously flawed.

Other Evidence Base:

- The West Berkshire Strategic Transport Model and the Air Quality Assessment have not been updated. Traffic desk based assessments are not appropriate and surveys should be carried out.
- The evidence relating to a Green Infrastructure (GI) framework is missing
- There are claims that parish councils were not adequately consulted on the Settlement Boundary Review
- There are inadequacies in the Thatcham Growth Study

The Consultation

- It was hard to access the representation form and the consultation was not advertised widely.
- The process of making representations was not straightforward
- There has not been a programme of public exhibitions
- There was insufficient consultation with town and parish councils
- The Council meeting on evening of 2 March, to decide whether to abandon the consultation/draft strategy, will have impacted decisions on pursuing representations, leading to a flawed consultation process.

Presentation

- The plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria.
- Maps throughout the document have no scale; some have no north arrow. The size of the text makes Crown copyright illegible.
- Some policies are very long, and no paragraph numbers makes it difficult to precisely refer to them.
- The policies could be more logically grouped
- Policies Map - Too many layers displayed simultaneously and it is impossible to read the detail. There is no postcode search facility and Newbury is very crowded and needs a separate map.
- Glossary – several suggestions for additions to Glossary.

2. Context

- Amendments proposed to para 2.1

3. Shaping West Berkshire: Vision & Objectives

Vision

There was broad support for the vision.

Issues raised included:

- A lack of reference to the West Berkshire Strategic Vision 2050 prepared to comply with NPPF para.22. Other Council Vision documents make commenting complex.
- The Plan doesn't place enough emphasis on the creation of high quality habitats relating to net gain requirements.
- The Council's strategic policies of the Local Plan (i.e. Policy SP12, the strategic site allocations and shortfall of industrial land) do not currently deliver the Plan's vision and objectives

Strategic Objectives

There was broad support for the strategic objectives.

Issues raised included:

- The lack of a strategic objective to address biodiversity decline
- Economy - suggestion to rename as employment and economic development. There should also be a policy in objective regarding creation of 'green jobs'
- Heritage – the heading refers to 'heritage' whereas the text refers to the built, historic and natural environments

4. Development Strategy: Our place based approach

Background to the Development Strategy

- Policies should be reviewed in the context of the Vision required by NPPF para 22
- The justification for merging the Eastern and Kennet Valley Spatial Areas is no longer valid due to the DEPZ
- The LHN should be tested at the examination
- HELAA site information not consistently updated

The Spatial Areas

- Some support for the approach but continued concern from Holybrook Parish Council about the Eastern Spatial Area
- Some minor amendments proposed
- A comment about the deliverability of both NDPs and the sites carried forward from the HSADPD

SP1 Spatial Strategy

There was significant support expressed for the Spatial Strategy.

The main issues raised related to:

- Whether the SA/SEA had evaluated reasonable alternatives. Queries related to the over-reliance on strategic sites, evaluation of reasonable alternatives around Thatcham and whether there was enough recognition of the opportunities for growth of rural villages.
- The North Wessex Downs AONB: Failure to make allocations at Pangbourne yet allocations at less sustainable settlements were not consistent with Policies SP1 and SP3. Liberal Democrat Group feel there should be more focus on viable rural communities.
- Newbury and Thatcham Area: Though Newbury is the focus for housing development, the Plan fails to identify sufficient allocations at Newbury.
- Eastern Area: Argument that an appropriate amount of development should be allowed for at sustainable locations in the Eastern Area. The role of Reading is underplayed. Issue of Burghfield Common as a rural service centre conflicting with restricted approach to development in the Detailed Emergency Planning Zone (DEPZ). Potential for development at Stratfield Mortimer has been overlooked.
- Densities: Some objection to the densities suggested in the centres of the rural service centres and in the parish of Holybrook.
- Evidence base: Questions regarding whether evidence base is sufficiently up to date.
- Role of NDPs: Some scepticism as to whether allocations would be forthcoming.

SP2 North Wessex Downs AONB

- There was general support for the policy from parish councils, North Wessex AONB and Historic England.
- Some representations, particularly from site promoters argued that more housing should be allocated in the AONB, to spread the impact of additional housing and to help meet affordable need.
- Some questioned whether proposed allocations accorded with the settlement hierarchy with some rural service centres receiving no additional allocations
- Some argued whether a greater allowance for new development should be made in the east of the AONB close to the Eastern Area.
- An objection was made to some duplication with the NPPF and a conflict with national policy over the definition of 'major development'.

SP3 Settlement Hierarchy

There was broad support for the settlement hierarchy, although some objections to the classification of individual settlements, notably Theale, Upper Bucklebury, Brimpton, Aldermaston Wharf and Englefield, from respondents seeking to either limit growth or to allocate additional development sites.

A number of consultees have criticised

- The more restrictive approach to development in the smaller villages arguing that there are a wider number of settlements that can take growth.

- The lack of allocations at some rural service centres, at Burghfield Common due to its location within the DEPZ and at Pangbourne and Stratfield Mortimer, in apparent conflict with their designation within the settlement hierarchy.

SP4 AWE

There was some support for the policy, including from the Atomic Weapons Establishment (AWE) but some concern from developers and site promoters that the DEPZ should not be taken as an absolute constraint and that development proposals should be determined on an individual basis, with consideration of whether development can be accommodated within the off-site emergency plan.

There were also representations from the promoters of the currently allocated housing site HSA16, now no longer proposed for allocation and for the employment site at Easter Park – both within the DEPZ.

5. Development Strategy: Our environment & surroundings

SP5 Climate Change

There was significant support for the principles of the policy setting ambitious expectations for achieving net zero carbon.

A number of objections were raised, including:

- From the Home Builders Federation and a number of developers/site promoters making the case that new development should be considered against Building Regulations and implementation of the Future Home Standard.
- That the policy should support/promote sustainable transport, encourage modal shift and sustainable movement of freight.
- Questioning why 'blue' has been removed as the policy refers to green and blue infrastructure, and suggestions from the EA that should be a bullet point about protecting and conserving the water environment.
- Concerns over clarity of what is required and viability of development
- Potential conflict with minimum parking standards set out in DM44.

SP6 Flood Risk

- Preservation of floodplains, with potential to designate as Conservation Areas.
- A 1 in 100 year runoff rate could lead to more flooding. A 1 in 50 year runoff rate would be more appropriate.
- In the application of the Sequential Test, criterion d should be revised to make clear that development will be safe for its lifetime.
- Paragraph 6 should be reworded for clarity so that it reads *'If the sequential test shows that it isn't possible for an alternative site to be used and therefore development has to be located in a flood risk area, it should be demonstrated that:..'*
- Paragraph 8 should be reworded for clarity so that it reads *'In addition to the sequential test, the exception test must be applied in certain situations according to national policy. This includes highly vulnerable development in flood zone 2, essential infrastructure in flood zone 3a or 3b, and more vulnerable development in flood zone 3a. The exception test should demonstrate how flood risk would be managed on site so that the development is safe taking into account the vulnerability of its users, and that it will not*

increase flood risk elsewhere. The exception test will also need to show that the sustainability benefits of the development to the community outweigh the flood risk.'

- Criterion p should be reworded to recognise that it is not always appropriate /possible to provide Natural Flood Management measures.
- Paragraph 5.17 should be reworded to read *'The sequential approach should be taken when determining the layout of a development site, meaning the most vulnerable development should be sited in the areas of lowest flood risk within the site.'*
- Policy needs an additional paragraph to make clear that it is the responsibility of the developer to make proper provision for drainage to ground, water courses or surface water sewer.
- Impact of flooding on surrounding areas and houses not considered.
- Surface Water Management Strategy not included on the validation checklist.
- No reference to methodology for determining cumulative impacts from all sources of flooding.
- FRA not required for sites below 1ha.
- Support for strict application of Sequential Test.
- Failure to demonstrate allocations comply with Sequential Test.
- Kennet Centre suitable for allocation so should not need to have a Sequential Test submitted at the planning application stage.
- Policy should be revised to afford weight to developments which improve flood risk on site or on adjacent sites.

SP7 Design Quality

There was general support for the policy with several suggestions for strengthening it.

The Environment Agency raised the potential conflict of paragraph 5.31 with the SP7 requirement for buffers alongside the Kennet and Avon Canal.

SP8 Landscape Character

There was general support for the policy.

There was some concern from developers/site promoters that the requirement for landscape assessments for all development may be unduly burdensome and impact viability.

SP9 Historic Environment

There was some general support for the policy with some suggested wording changes, in particular from Historic England.

Objections included:

- The inclusion, from Historic England, of 'enabling development' in the policy. As an exception to policy, it should be removed.
- Concern from Historic England over the number of Conservation Area Appraisals in place which has the potential to undermine implementation of DM9 and a recommendation that the programme for implementation be moved from DM9 to SP9 as it is a strategic issue.

- Concern from site promoters that points f) and g) could be interpreted as affording the same level of protection to designated and non-designated heritage assets, which is not in conformity with NPPF paragraph 203.
- The harm to setting is not a test in the NPPF. The significance of a heritage asset includes its setting.

SP10 Green Infrastructure

There was general support for the policy with some suggested wording amendments for clarification.

Main issues included:

- A lack of recognition of the need to link into identified green links or corridors within adjoining areas.
- A suggestion that the title is changed to - Blue Green infrastructure.
- Concern from Sport England of the lack of reference to formal sport facilities and playing fields. There should be a policy referring to the Playing Pitch Strategy and the need to enhance and provide playing fields
- A separate policy on Public Rights of Way was suggested
- Opportunities have been missed due to the lack of a GI strategy, categorisation and mapping by typology.
- Further clarity was suggested on how Natural England's Green Infrastructure Framework has informed the policy.
- There was support for the retention of the football ground in Newbury for community sport use and as a key green infrastructure asset.

SP11 Biodiversity and geodiversity

There was a good level of support for the policy with some suggested wording changes for clarification.

Main issues identified included:

- The inclusion, from the Environment Agency, of a standalone policy specifically about the water environment is required; important given the nationally and internationally protected sites that includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats within the Kennet floodplain
- The policy does not indicate the size of the ancient woodland buffer zone
- The policy should be amended to reflect the relevant, national requirement for Biodiversity Net Gain (BNG) in force at the time an application is considered.
- The supporting text indicates that householder and minor applications would need to be supported by a Preliminary Ecological Appraisal which could render them unviable. 10% minimum net gain is impractical for every single planning application
- Support for the policy to go further and adopt a 20% minimum net gain policy by BBOWT and, within the AONB, by the North Wessex Downs AONB.
- To comply with national policy, the policy should allow for off-site net gain
- It does not comply with NPPF para 174 by not fully protecting biodiversity, NPPF 179 by not having a policy to promote the identification of Local Wildlife Sites and NPPF 180 as does not make clear that proposals adversely affecting biodiversity and loss if not prevented on-site or by other mitigation will be refused.

6. Development Strategy: Delivering housing

SP12 Approach to Housing Delivery

Housing Requirement

Neighbouring Authorities are supportive of the Council's approach of meeting local housing need in full. Bracknell Forest Borough Council also requests that the LPR sets out how it will address meeting Reading's unmet needs.

A number of organisations and individuals argue that the target should be revised and could be reduced due to anticipated revised national guidance.

Some site promoters and developers are supportive of the approach and others advocate a higher housing requirement for a number of reasons:

- to ensure that economic growth ambitions can be met
- to better address affordable housing needs
- the Government's objective of significantly boosting supply
- identified and potential future unmet need from Reading
- insufficient buffer to allow flexibility
- the likely timeframe for adoption which may require additional supply

Use of a Range and Reading's Unmet Need:

There are some criticisms of the use of a range, arguing that this is contrary to the NPPF and that there is a lack of clarity as to the requirement against which delivery is measured.

Some site promoters make the case for a higher buffer.

There is a suggestion to clarify that the buffer could contribute to Reading's unmet housing need if required.

Housing Supply

Buffer

Site promoters and the Home Builders Federation (HBF) argue for a more substantial buffer in the overall supply to provide greater certainty of delivery.

Windfall allowance

Newbury Town Council, the Liberal Democrat Group and a number of individuals argue that the windfall allowance is too low and that there are known brownfield sites that should be included in the supply to reduce greenfield allocations.

The majority of site promoters and HBF argue that windfall allowance is too high and more small and medium sites should be allocated.

Site Allocations

Site promoters question the deliverability of existing allocations and commitments.

Suggestion that a non-implementation rate or additional buffer should be applied.

Also concern over the reliance on strategic sites where delivery may be slower than anticipated.

Delivery and Five Year Supply

Concern from site promoters and the HBF that the five year housing land supply (5YHLS) will be marginal upon adoption indicating the need to allocate more small and medium sites.

SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham

- A concern from the Environment Agency that all site allocation policies need revising to take account of environmental constraints and requirements / opportunities to ensure sites are delivered sustainably.
- Several sites within the settlement boundary of Newbury have not been allocated and should be, eg. Kennet Centre, LRIE, Gateway Plaza, and Former Magistrates Court. Some of these are at risk of flooding and/or within the River Lambourn Nutrient Neutrality Zone and the site specific policies should consider these. Failure to consider such sites has resulted in more greenfield sites than necessary being allocated.
- Support for removal of Kennet Centre as an allocation.
- Concern that allocation RSA2 (Land at Bath Road, Speen) will not deliver.
- Several sites in Newbury under construction and should therefore be allocated.
- The infrastructure associated with the proposed strategic site allocation at North East Thatcham would only benefit the new houses, and not the wider town as currently stated.
- No justification for reduction in dwellings at North East Thatcham.
- SA/SEA has not considered reasonable alternatives
- Reasonable alternative in Thatcham not considered, eg. Colthrop Village, Thatcham
- Over reliance on strategic sites for meeting housing need.
- Need for further allocations to ensure housing needs met, that medium-sized sites come forward, and contribute to housing delivery in short term.
- Several well located sites have not been selected for allocation – Land at Stoney Lane, land east of Waller Drive
- HELAA has not taken into account the benefits that the development at Sandford Park would bring.
- The name of site NEW8 in the HELAA is incorrect – it should be Sandford Park south.
- Potential for fifth access and capacity at Sandford Park to be increased through the allocation of adjoining land:
 - Land south of Gorse Covert
 - Sandford Park South
- Additional sites in Newbury and Thatcham suggested for allocation:
 - East of Hill Road, Speen
 - West of Hill Road, Speen
 - Land south of Newbury Racecourse, Newbury
 - Land adjacent New Road, Newbury
 - Land south of Pinchington Lane, Greenham
 - Land at Lower Way Farm, Thatcham
 - Former Newbury Leisure Park, Thatcham
 - Land at Enborne Street, Newbury
 - Land to north of Newbury
 - Land at Donnington Valley Golf Course
 - Land south of Turnpike Road
 - Land at Henwick Park
 - Newbury and Crookham Golf Club

SP14 Sites allocated for residential development in Eastern Area

- No significant cross-boundary implications. Support for policy from Reading Borough Council.
- Plan does not protect neighbourhoods
- Mortimer incorrectly identified as a Service Village at para 6.36 – it is a Rural Service Centre.
- A concern from the Environment Agency that all site allocation policies need revising to take account of environmental constraints and requirements / opportunities to ensure sites are delivered sustainably.
- Support by AWE for non-allocation of Grazeley and no additional sites being brought forward in Neighbourhood Plans in the Eastern Area
- AWE object to the allocation of Pondhouse Farm. Site within the DEPZ and allocation is contrary to policy SP4.
- The requirement in the IDP for additional GP space should be expressed as a net area, not gross area. Change to a net area results in change to costs.
- The SA/SEA for Pincents Lane, Tilehurst (TIL13) includes incorrect information for the site, eg. most of Pincents Lane single lane, Pincents Lane is an ancient sunken lane, there are 4 footpaths not 2 across the site
- Concern that the Council will rescind the gaps between settlements
- The Air Quality Study and the West Berkshire Strategic Transport Model omit allocations RSA10 (Whitehart Meadow, Theale) and RSA11 (Former Sewage treatment Works, Theale). Sites are unsustainable and should not be allocated.
- Additional housing provision should be made in Burghfield, for example SUL1 should be allocated. No reason for moratorium on housing that falls within the DEPZ in Burghfield.
- The Housing Site Allocations DPD allocation at The Hollies should be retained in the Local Plan Review.
- Additional sites should be allocated for reasons that include there being no small site allocations, incorrect assessments in site selection process, insufficient land to meet needs:
 - Land at Hall Place Farm, Tilehurst
 - Spring Lane, Mortimer
 - Monkton Copse, Mortimer
 - Land at West End Road, Mortimer
 - Kiln Lane, Mortimer
 - Land west of Brimpton Road, Brimpton

SP15 Sites allocated for residential development in North Wessex Downs AONB

- A concern from the Environment Agency that all site allocation policies need revising to take account of environmental constraints and requirements / opportunities to ensure sites are delivered sustainably.
- The strategy of limiting growth in the AONB has not been applied in Hermitage.
- The cumulative impact of development in Hermitage has not been considered.
- The requirement in the IDP for additional GP space should be expressed as a net area, not gross area. Change to a net area results in change to costs.
- Site allocations inconsistent with the spatial strategy – no allocations in Pangbourne yet less sustainable settlements have allocations. Land north of Sheffield Place, Pangbourne suitable for allocation.
- Policy should be reworded to identify that the level of development at each site is an approximate capacity and not a cap.
- Scale of development in the AONB should be limited. Several allocations should be removed due to constraints.

- Contingency required in the event that allocations in neighbourhood plans do not deliver, for example a time limit
- Little point in listing the NDPs in the policy which are not including allocations
- Additional sites should be allocated for reasons that include no new allocations in Lambourn, significant affordable housing need in the AONB, to assist in meeting housing need, sites needed in the early part of the plan period, to assist in meeting need for elderly persons accommodation:
 - Land west of Little Heath Road, Tilehurst
 - Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A')
 - Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B')
 - Englefield – ENG1, ENG2 and ENG3
 - Smitham Bridge Road, Hungerford
 - Marsh Lane, Hungerford
 - Bowden Fields, Pangbourne
 - Land at Berecourt Road, Pangbourne
 - Land between Folly Road, Rockfel Road and Stork Drive, Lambourn (LAM1)
 - Windsor House Paddocks, Lambourn
 - Lambourn Business Park
 - Land west of Wantage Road, Lambourn
 - Cock Lane, Bradfield Southend
 - Land rear of Ash Grove, Bradfield Southend
 - Chieveley
 - Land south of recreation ground, Boxford
 - Upper Basildon

SP16 Sandlesford site allocation

A representation on behalf of the developer of Sandlesford Park East - subject to submission and grant of planning permission for Reserved Matters, the site is realistically deliverable within the plan period. Some suggested wording amendments submitted – significant concern with provision of on-site renewable energy to assist delivery of carbon neutral development.

Other issues raised:

- It should be demonstrated that the strategic flow of traffic is prioritised and not compromised with the new access onto the A339 (Hampshire CC).
- The allocation has not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of the site (Environment Agency).
- Concern over the use of Warren Road as an access.
- The LPR should reference the increased amount of developer contributions required for the extension to Falkland Surgery.
- Doubts as to the deliverability within the plan period.
- Request that buffers between development and ancient woodland be changed to at least 15 metres.
- It should be clearer that the housing mix should respond appropriately to the SHMA (or other relevant housing needs assessment) requirements relevant at the time an application is considered.
- The boundary line of the allocation should tie in with planning applications.

- It has not fully taken account of all the reasonable alternatives i.e. an option to increase the size of the Sandford Park Strategic Allocation by allocating additional land to the south.

SP17 North East Thatcham site allocation

There were a very large number of objections to this site, particularly from local residents, covering a range of issues but largely around the environmental impact of the proposal and the impact on local infrastructure.

Bucklebury Parish Council and Thatcham Town Council in particular made extensive comments on the policy and raised particular concerns.

- SA/SEA – not all reasonable alternatives have been considered, and there is a lack of justification for the reduction in the number of dwellings.
- Brownfield and other sites, particularly in Newbury, should have been considered first not North East Thatcham
- Housing numbers - the policy lacks clarity on the final number to be accommodated on site
- Deliverability of 1500 dwellings within the plan period is questioned by a number of consultees.
- Status of Thatcham Strategic Growth Study (TSGS) – it is unclear how the principles are to be applied to the 1,500 development and what weight can be attached to the TSGS
- Provision for secondary school, health provision and other infrastructure. It is apparent that the level of infrastructure has been reduced, and therefore the extent of the sustainability advantages of the site have been watered down.
- Landscape impact – the impact on Bucklebury Common and the wider AONB and question links to AONB given the sensitivity of the landscape
- Further more detailed work needs to be done on the potential landscape and visual impact of the proposed development before the planning application stage
- Community park - the value of three small, isolated areas is questioned.
- Further work is needed on the heritage impact (Historic England)
- Impact on biodiversity.
- Settlement boundary – question whether the settlement boundary should be shown as the site boundary before further masterplanning work is carried out.
- Traffic impact both in terms of volume and the rural character of roads in the parishes of Bucklebury, Cold Ash and Midgham but also the exacerbation of congestion issues relating to level crossing in Thatcham
- Concern from Network Rail that without an alternative to the Thatcham level crossing, the policy would not accord with DM42 g which requires new developments to improve safety and operational capacity of the local road network.
- The aquifers and the groundwater should be protected and the existing and proposed flood defence schemes on the site should be considered in a flood risk assessment (Environment Agency)
- No reference is made to West Berkshire Strategic Vision which was commissioned to meet requirements of NPPF paragraph 22. Nothing in LPR looks beyond end of the plan period.

SP18 Housing type and mix

There was some support for the policy with some suggested amendments.

The main issues raised included:

- A need to place further emphasis on delivering family accommodation in areas adjoining Reading due to much of the delivery in Reading being at high density in the town centre.
- A recommendation that the Council amends its policy to ensure no unnecessary repetition of building regulations.
- Concern that the requirement regarding M4(3) is not supported by the Council's evidence. It is an optional standard and should only apply on a site-by-site basis to reflect local need and demand. There is a need for clarity on whether it applies to major development only.
- Objection to the mix in Table 3 and a suggestion that it should apply only to affordable housing.
- Concern that material considerations affecting the specialist older person's accommodation have not been fully considered. NPPF para 63 requires the LPA to consider the size, type and tenure of housing needed for older people. Further allocations should be made for specialist older persons housing, or flexible provision should be made in DM1.
- The LPR should either allocate or ensure that development is obliged to deliver an element of self and custom-build housing to ensure needs are met.

SP19 Affordable Housing

There was some support for the policy, particularly from Reading Borough Council with a recommendation to consider seeking affordable housing contributions from all sizes of site.

The main issues raised in the objections to the policy included:

- Concern that the rate applied to PDL sites is at the upper end of what is viable. The requirements for 10% BNG and net zero carbon emissions will place more pressure on the viability of development.
- The intention to provide 20% affordable housing should apply only to sites of 5 to 9 dwellings in designated rural areas.
- The requirement for affordable homes to be built to net zero carbon standards should be reflective of the building regulations requirements. The policy should align clearly with Policy DM4.
- Lack of affordability of First Homes – a suggestion that the Council should review whether omission of tenure or flexibility could protect the overall delivery of affordable housing, which would be justified by the evidence base.
- Neither the policy nor supporting text recognise the really urgent need for the delivery of more affordable housing. No affordable targets or requirements are set in the context of the settlement hierarchy (required to ensure consistency with NPPF 11 a&b, 61-63).
- The information in viability assessments can often be commercially sensitive and therefore the amendment to state that they must be publicly available should be deleted or amended.
- The required review mechanism to enable the Council to reassess viability over the lifetime of the development is not reasonable and would be difficult to monitor/enforce.
- Where there is reference in the policy to extra care housing, this should be amended to also include sheltered housing and retirement living. It should be clarified that specialist housing schemes for older people should be exempt from providing First Homes and Starter Homes on site.

7. Development Strategy: Fostering economic growth & supporting local communities

SP20 Strategic approach to employment land

Neighbouring authorities are unable to contribute to meeting West Berkshire’s unmet need but are supportive of the commitment to address this issue in the first five-year review.

The main issues raised in objections to the policy included:

- The Plan does not meet the objectively assessed need. Developers/site promoters argue that this issue should not be left to a review and identify additional sites, including the proposed development of sites adjacent to existing employment areas.
- The SA/SEA is flawed as does not appear to have considered any scenarios in relation to the impact of the shortfall and meeting or exceeding the employment need over the plan period.
- Development within the DEPZ should not be precluded. It is the Council’s role to consider whether proposed development can be accommodated within the off-site emergency plan, not to treat the DEPZ as an absolute constraint.
- Considered that the plan should take into account industrial and logistics need in the Berkshire Functional Economic Market Area (‘FEMA’) and wider region.
- Thames Valley Chamber of Commerce believes the LPR should set out criteria led site-specific policies for each DEA which considers the relevant constraints and characteristics of the site.
- Concern regarding encouragement of office development in DEAs and impact on viability of town centres.
- London Road Industrial Estate – supporting text does not provide clarity on future of LRIE or the football ground. It has irrationally excluded the option to redevelop the football ground as a revitalised sporting venue. A comprehensive development-plan led policy framework would be required. West Berkshire Council, as landowner, suggests wording to make clear that the long term intention is to include the football ground in the LRIE.
- Paragraph 89 NPPF is clear that the sequential test should not be applied to small-scale rural development. Policy should ensure that suitable proposals can come forward without unnecessary additional justification.
- Policy wording is overly prescriptive.
- Important that the LPR recognises the benefits of providing supporting subsidiary uses such as small-scale retail or hotel to business development locations. Request that also updated to include Data Centres as an appropriate business use.
- The Liberal Democrat Group suggests that Newbury Showground could become a rural business hub.

SP21 Sites allocated for employment land

- There were a number of objections to the extension of Membury Industrial Estate, largely on the grounds of landscape impact, inadequate transport infrastructure, risk of flooding, pollution, carbon footprint, noise, impact on rural economy, inadequate infrastructure to cope with power demands, lack of EIA for site or wider area.
- Misunderstandings regarding London Road Industrial Area, which is already a Protected Employment Area.
- Additional employment sites proposed:
 - Newbury Showground suggested by Liberal Democrat Group
 - Land at Lower Way Farm ((HELAA ref: THA9)

- Hoad Way, Theale
- Easter Park, which is no longer proposed due to its location within DEPZ (impact should be assessed on merits)
- Land adjacent to Beenham Industrial Area.
- Extension of LRIE to the south from West Berkshire Council as landowner.

SP22 Town and district centres

- Support for the goal of maintaining and enhancing the vitality and viability of town and district centres
- Importance of evidence being updated as soon as possible
- The need for a specific policy for Newbury.
- To exempt new office developments in DEAs from sequential test will endanger the viability of town centres.
- Policy regarding changes of use form Class E is not sufficiently restrictive.

SP23 Transport

- In regard to the strategic road network (SRN), clarity is sought by National Highways on what is meant by 'a suitable mitigation package'
- The Plan lacks reference to new strategic infrastructure e.g. recognition of the importance of park and ride provision in the Reading area.
- SA/SEA of strategic policies needs to be reviewed after completion of the Strategic Transport Analysis
- Opportunities to support sustainable transport and specifically encourage modal shift have been missed.
- Modelling needs to be re-run using the best national post-pandemic traffic data and the proposed LPR allocations.
- LPR should include a specific plan for the widespread availability of electric charging points
- Unclear when a Transport Assessment of Statement should be applied for non-residential development
- Requirements of this policy are not proportionate and fail to reflect the rural nature of much of West Berkshire.
- The proposed spatial pattern of development would reinforce unsustainable patterns of transport and travel and focus more traffic on overloaded junction 13 whilst capacity exists at junction 12.

SP24 Infrastructure requirements and delivery

- Urgent current need for hospital/medical provision not addressed
- Given their strategic importance, healthcare facilities should be given the same standing as affordable housing and public transport improvements when allocating funds.
- Should be specific reference to primary, secondary and tertiary education and the means to ensure their delivery.
- Key items of infrastructure are missing from IDP, including those required for the North East Thatcham development, and IDP lacking evidence of realistic cost estimates.
- Reference to consistency with the tests at Section 122 of the CIL Regulations (2010) (as amended) should be made within the policy.

8. Non-Strategic Site Allocations: Our Place Based Approach

General comments

- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.
- Request for all sites to consider/list environmental constraints and highlight requirements and opportunities to provide perspective in order to allow the sustainable delivery of each site from the Environment Agency.

Sites allocated for Residential Development: Newbury & Thatcham area

RSA1 Land north of Newbury College, Monks Lane, Newbury

- Thames Water noted that supply upgrades likely to be required.
- Environment Agency noted that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Site promoter request to include an additional parcel of land within the site allocation boundary.
- Concern from a promoter of another site over the uncertainty of the delivery of this site

RSA2 Land at Bath Road, Speen, Newbury

- Historic England concerned that allocation currently unsound due to lack of Conservation Area Appraisal and heritage assessment
- Thames Water noted that supply upgrades likely to be required.
- Environment Agency noted that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Parish Council concerned with access onto the A4

RSA3 Land at Coley Farm, Stoney Lane, Newbury

- Thames Water noted that supply upgrades likely to be required.
- Environment Agency noted that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Comment from the site promoter that the site is allocated retrospective to planning permission and so should be removed.
- Concern from a promoter of another site over the uncertainty of the delivery of this site

RSA4 Land off Greenham Road, South East Newbury

- Environment Agency noted that an FRA would be required and that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water noted that upgrades required to water supply and wastewater networks, including sewerage treatment infrastructure.

RSA5 Land at Lower Way, Thatcham

- Environment Agency noted that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water noted that upgrades required to water supply networks
- Thatcham Town Council comments that the policy should reflect the already approved scheme
- Concern that traffic will impact other parishes linked by the A4 such as Theale

Sites Allocated for Residential Development: Eastern Area

RSA6 Stoneham's Farm, Long Lane, Tilehurst

- Woodland Trust support for policy requirement for protection of ancient woodland.
- No concerns from Thames Water or the Environment Agency

RSA7 72 Purley Rise, Purley on Thames

- No concerns from Thames Water or the Environment Agency

RSA8 Land adjacent to Bath Road and Dorking Way, Calcot

- Theale Parish Council concerned about noise and air pollution from M4 and that it will increase flood risk
- Concerns regarding character and design from Holybrook Parish Council
- Thames Water noted that upgrades to wastewater infrastructure, including sewerage treatment infrastructure required

RSA9 Land between A340 and The Green, Theale

- Historic England concerned that the policy should make particular reference to the listed milestone on the site and its setting and also the nearby Registered Park and Garden of Englefield House
- Concern from Theale Parish Council and local residents about the pressure on local infrastructure (schools, doctors, etc.), an increase in flood risk, traffic impacts and an increase in noise and air pollution
- Thames Water noted that upgrades to wastewater infrastructure, including sewerage treatment infrastructure required
- Concern from a promoter of another site over the uncertainty of the delivery of the site

RSA10 Whitehart Meadow, Theale

- Many concerns expressed from local residents about the impact of the development, particularly in combination with RSA11.
- Concern from a number of local residents about the pressure on local infrastructure (schools, doctors, etc.), an increase in flood risk, traffic impacts and an increase in noise and air pollution.
- Theale Parish Council expressed continued concern about access to the site

- The impacts on the landscape character of the area, including the AONB, biodiversity and green infrastructure were additional concerns raised, together with the erosion of the settlement separation between Theale and Calcot.
- Environment Agency supported the limitation of development to Flood Zone 1
- Thames Water noted that the scale of development is likely to require upgrades to the water supply network infrastructure
- National Grid assets need consideration
- Site promoter considers the opportunity should be taken to make efficient use of land, with supporting evidence provided.

RSA11 Former Theale Sewage Treatment Works, Theale

- Many concerns expressed from local residents about the impact of the development, particularly in combination with RSA10.
- Concern from a number of local residents about the pressure on local infrastructure (schools, doctors, etc.), an increase in flood risk, traffic impacts and an increase in noise and air pollution.
- Theale Parish Council expressed continued concern about access to the site
- The impacts on the landscape character of the area, including the AONB, biodiversity and green infrastructure were additional concerns raised, together with the erosion of the settlement separation between Theale and Calcot.
- Thames Water noted that the scale of development is likely to require upgrades to the water supply network infrastructure
- Site promoter considers the opportunity should be taken to make efficient use of land, with supporting evidence provided.

RSA12 Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common

- Objection from AWE as redefinition of the DEPZ for AWE means the site now directly contradicts SP1.
- Thames Water noted that the scale of development is likely to require upgrades to the water supply network infrastructure
- Woodland Trust support for the protection for ancient woodland but boundaries should be corrected.

RSA13 Land north of A4 Bath Road, Woolhampton

- Many concerns from local residents including impact on local infrastructure, traffic, water quality, flood risk, biodiversity, light pollution and loss of rural character
- Support for protection of ancient woodland from the Woodland Trust
- No concerns from Thames Water or the Environment Agency
- Site promoter support for site although does not consider odour assessment, heritage and mineral assessments are justified.

Sites Allocated for Residential Development: North Wessex Downs AONB

RSA14 Land adjoining Lynch Lane, Lambourn

- The Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water noted that upgrades would be required to the water supply network.
- Concern from Lambourn Parish Council and NDP Group that the current level of housing is undeliverable but that a smaller number could be acceptable
- Concern from the promoters of other sites over the uncertainty of the delivery of this site

RSA15 Land at Newbury Road, Lambourn

- The Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns
- Concern from the promoter of another site over the uncertainty of the delivery of this site

RSA16 Land North of Southend Road, Bradfield Southend

- No concerns from either the Environment Agency or Thames Water
- Site promoter support for policy, with some amendments to the criteria suggested

RSA17 Land at Chieveley Glebe, Chieveley

- Local residents particular concerns about access arrangements, traffic impacts and the impact on the rural character of East Lane and the wider AONB
- Chieveley Parish Council support for a limit of 15 dwellings, links to PROW and affordable housing
- Support for the provision of a burial ground for the local community and the site promoter
- Historic England concern about the lack of a Conservation Area Appraisal (CAA) and general lack of heritage assessment - further assessment is required
- Environment Agency considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns

RSA18 Pirbright Institute Site, Compton

- Compton Parish Council request for the adopted Compton Neighbourhood Development Plan to be take more into account. Specific wording proposed.
- Historic England encourages the preparation of a Conservation Area Appraisal as a matter of priority. Specific wording changes also proposed
- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.
- Request for some wording changes from the Environment Agency. Environment Agency also noted that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation which must be stated in the policy.
- Thames Water noted that upgrades would be required to the water supply network.

RSA19 Land west of Spring Meadows, Great Shefford

- Concerns from local residents included the impact on existing infrastructure, particularly access arrangements, traffic and the school.
- Particular concerns about flood risk, impacts on the River Lambourn SAC and waste water infrastructure
- Impact on the landscape character of the area and the wider AONB
- School governors concerned about safeguarding, additional vehicle movements and appropriate CIL or s.106 contributions for school infrastructure.
- Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water no concerns identified. Proposed including reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
- Historic England supports the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised.

RSA20 Land off Charlotte Close, Hermitage

- Hermitage NDP Group concerned about the quantum of development in the village and the lack of evidence o to assess cumulative impacts
- Historic England supports the requirement for desk-based archaeological assessment and if required, field evaluation.
- Environment Agency considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns

RSA21 Land to the south east of the Old Farmhouse, Hermitage

- Hermitage NDP Group concerned about the quantum of development in the village and the lack of evidence to assess cumulative impacts
- Historic England concerned policy does not mention Barnaby Thatch (Grade II) to the North. Additional wording proposed.
- Environment Agency considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns
- Site promoter supports continued allocation of site

RSA22 Land adjacent Station Road, Hermitage

- Heritage Parish Council is concerned about the impacts on Church parking and also that that cycleways and pedestrian links should be provided
- Hermitage NDP concerned about the lack of evidence of viability– should not be brought forward if more houses required
- Additional concerns about landscape impacts and the indicative plan not reflecting the LSA 2022
- Historic England requires a Heritage Impact Assessment due to the presence of non-designated heritage assets and the nearby Scheduled Monument (Grimsbury Castle) and for the development to be informed by a desk-based archaeological assessment followed by field evaluation if necessary
- Environment Agency considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns
- In principle support from the site promoter but various amendments proposed to account for making the best use of land, the sequential approach to development, on site design and relationships with adjoining land and other site allocations, highway access, walking/cycle links, reopening the disused railway, and land ownership considerations.

RSA23 Land adjoining The Haven, Kintbury

- Concern from local residents and CPRE about the principle of development, landscape/visual impacts, access arrangements, impacts on traffic, existing infrastructure,
- Environment Agency requires an FRA as part of the policy requirements. Considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns
- Site promoter support for allocation

Gypsy, Traveller & Travelling Showpeople Accommodation

RSA24 New Stocks Farm, Paices Hill, Aldermaston

- Support for allocation from Wokingham Borough Council
- Thames Water and Environment Agency concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered, is required.

RSA25 Long Copse Farm, Enborne

- Clarification of flood risk required from the Environment Agency
- Thames Water concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered, is required.
- Some assessment of heritage impacts required by Historic England
- Woodland Trust supports protection of ancient woodland
- Support for policy from site promoter

Sites allocated for employment land

ESA1 Land east of Colthrop Industrial Estate, Thatcham

- Thames Water noted that upgrades required to water supply and wastewater networks, including sewerage treatment infrastructure
- Clarification requested from Historic England as to whether a field evaluation is required.
- Environment Agency noted that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy

ESA2 Land west of Ramsbury Road, Membury Industrial Estate

- Concern expressed from many local residents including traffic impacts, air, light and noise pollution, the unsustainability of the site, and the impacts on the rural character of the area.
- Historic England support for approach to nearby heritage assets
- Thames Water noted that upgrades would be required to the water supply network.
- Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Site promoter support for allocation, but request original size be reinstated.

ESA3 Land to the south of Trinity Grain, Membury Industrial Estate

- Concern expressed from many local residents including traffic impacts, air, light and noise pollution, the unsustainability of the site, and the impacts on the rural character of the area.
- Historic England support for approach to nearby heritage assets
- Thames Water noted that upgrades would be required to the water supply network.
- Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Site promoter support for allocation but consider that B8 use should not be excluded, the access should be amended, and contest the need for a Heritage Impact Assessment

ESA4 Beenham Landfill, Pips Way, Beenham

- Beenham Parish Council concerns about lighting, noise and potential landscape impacts
- Environment Agency no concerns
- AWE has no in principle concerns
- Thames Water noted that upgrades will be required to water supply and wastewater networks, including sewerage treatment infrastructure.

ESA5 Northway Porsche, Grange Lane, Beenham

- Beenham Parish Council concerned about noise and request criterion (d) is removed. Also request the access should be upgraded and the ownership clarified
- Environment Agency no concerns
- AWE no in principle concerns
- Thames Water noted that upgrades will be required to water supply and wastewater networks, including sewerage treatment infrastructure.
- Site promoter support for allocation, request developer contributions are limited to only what is necessary and cannot be delivered on site.

ESA6 Land adjacent to Padworth IWMF, Padworth Lane, Padworth

- Canal & River Trust request consideration of impacts on adjacent canal
- Potential for land contamination and an intrusive investigation and assessment should be undertaken including remediation measures.
- Beenham Parish Council concerned about noise and landscape buffer
- Environment Agency no concerns
- AWE no in principle concerns
- Thames Water noted that upgrades will be required to water supply and wastewater networks, including sewerage treatment infrastructure.

9. Development Management Policies: Our place based approach

DM1 Residential development in the countryside

Some support for policy

Objections to weakening of the criteria for exceptions.

- '*appropriately designed and located*' lacks clarity.
- Criterion b – sites for Gypsies, Travellers and Travelling Showpeople should be allocated and not subject to an exception

Objections to restrictive nature of policy

- Fails to support the local building industry,
- Given major changes in living, travel and working habits there seems to be a reduced need to control development in the countryside.
- Sites close to higher order settlements will be far more sustainable than those close to more remote settlements.
- Suggestions that policy should allow development outside settlement boundaries for residential development for staff at existing educational institutions, for specialist housing for older people and to support delivery of infill development or self or custom build plots in edge of settlement locations.

DM2 Separation of settlements around Newbury & Thatcham

Some support and suggestions for designation of additional gaps from parish councils and individuals in other parts of the District.

Developers/site promoters had a number of objections:

- Already sufficient protection by countryside status and no need to add a further layer of constraint.
- Evidence base justifying the designation is not robust.
- Para.9.11 contradicts itself - the quality of the landscape and other environmental factors are not a consideration.
- Not agreed that that “no more land than necessary” has been proposed for designation as gap – some areas proposed are already protected by environmental designation.
- SA/SEA of DM2 is flawed

10. Development Management Policies: Our environment & surroundings

DM3 Health and wellbeing

- General support for the policy
- Suggestion to include reference to health and wellbeing benefits of being able to stay within local community.

DM4 Building sustainable homes and businesses

General support for objectives of policy with some suggestions from parish councils and individuals -

- Should state how national targets for reduction of CO2 emissions will be met

- Should consider measures to increase retro-fitting energy efficiency measures for existing housing stock.
- No mention of micro-generation
- Building standards, renewable energy developments and carbon offsetting should be covered by different policies
- Listed buildings should be excluded from requirement

The development industry were primarily concerned with the requirements to go beyond current building regulations and those that would be introduced in the Future Homes Standard, and how this may affect viability and housing delivery. Representations contained a number of detailed points regarding the practicality and implementation of the policy.

Particular objections/ suggestions included:

- Technical evidence, assumptions and evidence of viability testing are unclear
- Reference to unregulated energy use in this policy should be deleted as it is not in the control of the developer.
- Not all proposals will be physically or financially able to achieve BREEAM excellent, which needs to be acknowledged in policy
- Suggest that the supporting text includes information setting out how the Council will calculate the price for offsetting carbon and where payment will be used.
- Question the assessment of risk for number of policy approaches in the DM4 evidence base.

DM5 Environmental nuisance and pollution control

- Some developer concern over requirements regarding tranquillity, light spill and glare impacting viability.

DM6 Water quality

- Recommendation from the Environment Agency for a standalone water course policy to be included in the LPR
- Concern regarding buffer zone for watercourses and recommended extra flexibility for smaller water bodies.

DM7 Water resources and wastewater

General support for principles of policy with some recommendations for suggested amended wording

Main issues raised -

- Failure to explore going further than the 110l/p/d water efficiency target, particularly in larger strategic developments.
- Policy needs to be strengthened to ensure water efficiency standards met.
- Request from Town and Manor of Hungerford Charity for alternative area for safeguarding at Hungerford Sewage Treatment Works.
- On provision of infrastructure to serve development, Thames Water considers that a specific policy on the key issue of the provision of water and sewerage/wastewater

infrastructure be included. Environment Agency seeks further details on timeline and approach to ensure improvements.

- Development industry raise concerns regarding aim for water neutrality and additional costs of grey water recycling.

DM8 Air quality

- General concern from public on impact of increasing development on air quality
- Question requirement for an air quality assessment based on parking provision (point (iii))

DM9 Conservation Areas

- Main concern expressed by Historic England, West Berkshire Heritage Forum and the Newbury Society is in relation to Conservation Area Appraisals and the limited progress being made on their preparation. Historic England considers this to be a strategic issue which should be dealt with under SP9
- Some other suggested wording amendments

DM10 Listed Buildings

- General support for policy
- Concern from site promoter that “will not be permitted” does not allow a balanced judgement and that the reference to public benefits in conflict with SP9 and the NPPF
- Some minor wording amendments proposed.

DM11 Non-designated Heritage Assets

- General support for policy including from Historic England
- Concern from landowner that the policy affords the same level of protection to both designated and non-designated heritage assets which is inconsistent with national policy

DM12 Registered Parks and Gardens

- Support from Historic England

DM13 Registered Battlefields

- Support from Historic England
- Suggested policy strengthening from the Battlefields Trust, along with consideration of designating the second battle of Newbury site, and restricting permitted development rights on the First Battle of Newbury site through an article 4 direction (DMPO)

DM14 Assets of Archaeological Importance

- Support from Historic England

DM15 Trees, woodland and hedgerows

- Support for the policy particularly from the Woodland Trust
- Biodiversity should be specifically referenced
- Regarding species selection, non-native species may be considered more appropriate in some locations.
- Too restrictive in only allowing protected trees to be removed in “exceptional circumstances”.
- Not appropriate to conserve trees, woodlands and hedgerows in all instances
- Suggestion to give weight to developments that provide enhancements to trees, woodland and hedgerows

Development Management Policies: Delivering Housing

DM16 First Homes exception sites

- Policy supported. Minor word changes proposed.

DM17 Rural Exception housing

- General support for policy from the development industry
- Concerns that the requirement for all schemes to provide a local housing needs survey is onerous
- Consider that should be amended to allow for the delivery of market housing to meet a specific local need identified through a Housing Needs Survey

DM18 Self and custom build housing

- Suggestions from the development industry that strategic sites and small plots in a limited number of settlements should be supported.
- Request for self and custom build housing be allocated, or mandate that it should be delivered through other developments.

DM19 Specialised housing

- General support for principles of policy
- Important that this policy sets out the need in the policy and commitment made to monitoring
- Recommend that a presumption in favour of development be applied if the supply falls below identified annual needs
- Criterion (a) is unnecessary as the need is self-evident in the Housing Needs Assessment
- Policy should positively encourage this type of accommodation in areas with good transport links and local facilities
- Suggestion that where schemes meet the criteria they will be supported within and outside of settlement boundaries
- Need for allocation of specific sites, rather than rely on strategic allocations.
- Seeking specialist housing on strategic sites should be subject to evidence of need and site specific viability.

DM20 Gypsies, Travellers and Travelling Showpeople

- Broad support from neighbouring authorities who are keen to continue to engage
- Bracknell Forest Borough Council of the view that transit provision is not a duty to co-operate matter.
- Environment Agency requests that policy makes clear that caravans are not permitted in Flood Zone 3

DM21 Retention of mobile home parks

- Policy supported

DM22 Residential use of space above non-residential units

- 11.45 in tracked changes version should be reinstated

DM23 Housing related to rural workers

- Liberal Democrat Group feel point (g) is too restrictive.

DM24 Conversion of existing redundant or disused buildings in the countryside to residential use

Overall approach supported with some objections and changes recommended:

- Environment Agency asks that it includes points to ensure any proposed conversion development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors. Suggested wording supplied.
- Liberal Democrat Group concern that requiring a building to be structurally sound simply adds to cost and delay.
- Some of criteria are unnecessary duplication of those in other policies.
- Objections to criteria (f), (g) and (h),
- Last paragraph of policy is contrary to section 38(6) of the Planning and Compulsory Purchase Act 2004.
- National policy does not distinguish traditional farm buildings from modern large agricultural sheds and each case should be considered on its merits.
- Suggest reference to re-use' of redundant or disused buildings is retained to clarify that existing buildings can be brought back into use.
- Requirement to 'retain' features and fabric may prejudice suitable development being delivered.

DM25 Replacement of existing dwellings in the countryside

General support for policy.

Main issues raised:

- Suggested wording from the Environment Agency provided to strengthen the policy in relation to flood risk and sensitive receptors.

- Policy does not encourage landscape enhancements, sustainable or innovative design.
- Criterion g - there may be cases where the existing curtilage may be inappropriate. Policy should be flexible as in criterion b.
- Policy should be amended to set out what weight will be afforded to developments that provide enhancements to the landscape/design/biodiversity/sustainability and/or innovative/high quality design

DM26 Extension of residential curtilages in the countryside

- No issues raised

DM27 Sub-division of existing dwellings in the countryside

- Support for the policy

DM28 Residential extensions

- Support for the policy
- Suggested wording from the Environment Agency provided to strengthen the policy in relation to flood risk and sensitive receptors

DM29 Residential annexes

- Support for the policy
- Suggested wording from the Environment Agency provided to strengthen the policy in relation to flood risk and sensitive receptors

DM30 Residential space standards

- Support for policy
- Council need evidence, both to show need for such homes and that they can realistically be delivered.
- The size of market units should be determined by market preferences and location – policy may affect viability and suggest applies to affordable dwellings only

DM31 Residential amenity

- Support for policy
- Policy too permissive – minimum garden length should always be observed
- Policy too restrictive – specifying minimum standards for gardens and separation distances may impact site layouts and lead to the inefficient use of high value land. Should be considered on a case by case basis.

11. Development Management Policies: Fostering Economic Growth & Supporting Local Communities

DM32 Designated Employment Areas

- Some support for policy
- Support the use of DEA's to constrain the use of permitted development rights to convert business premises to residential use – if that is the intention.
- Insufficient land to meet the identified need
- Disagree that office proposals won't have to satisfy the sequential test
- Policy should provide guidance for development adjacent to/on the periphery of DEAs
- GI and community facilities should be protected within DEAs
- Should include criteria based, site specific policies for each DEA
- Policy should go further to encourage appropriate development within DEAs
- Policy is likely to lead to the loss of blue collar employment within DEAs
- Some requests to amend DEA boundary areas

DM33 Development within AWE

- Some support for policy
- Request for consistent terminology throughout the plan regarding the function of the AWE sites
- Request reference in supporting text to other enabling works in connection with development carried out under this policy.
- Suggest policy is aligned with Policy 13 in the Minerals and Waste Local Plan
- Plan should include provision for the other defence sites within the plan area – Denison Barracks and RAF Welford

DM34 Retail Parks

- The evidence of need is dated, and it is not clear whether it is being met
- Retail Park at Calcot should be renamed 'Calcot Retail Park', and its boundary should exclude IKEA and Dunelm
- Policy should cover town centre retail areas, or there should be a separate policy on these areas
- Services provided in retail areas and their locations are disjointed which encourages commuting
- Environmental protection of retail areas should be considered
- Policy is not consistent with NPPF and should be removed
- Policy constrains future growth at existing retail areas and doesn't allow for retail floorspace to be adapted and repurposed

DM35 Sustaining a Prosperous Rural Economy

- Some support for policy
- The West Berkshire Rural Business Forum should be mentioned
- The plan should prevent rural businesses and residents from being driven out by industrialisation
- The Council should lead whole estate plans
- The requirement to make a long-term contribution is onerous and unjustified

- Concern some criteria are contrary to or go beyond the requirements of the NPPF
- Policy could be re-worded 'Supporting the Rural Economy'
- Reference to compliance with other policies in the plan is unnecessary and should be removed
- Policy should include enabling provisions for leisure-based activities

DM36 Farm Diversification

- Support for policy
- Concern some criteria not consistent with or go beyond the requirements of the NPPF
- Reference to other development plan policies is duplication and should be removed

DM37 Equestrian and Horseracing Industry

- Some support for policy
- The Plan could go further to recognise the importance of the HRI to the rural economy and the Plan's commitment to the protection and support for growth of the HRI in a strategic policy.
- Policy should be split into two covering controlling equestrian developments and supporting the horseracing industry
- Policy should include provision for flood risk
- Existing facilities should be safeguarded
- The policy should include further elements relevant to the horse racing industry
- Former equestrian land should be released for alternative development where it is unlikely to be used again in the future

DM38 Development on Existing Educational & Institutional Sites in the Countryside

- Support for policy
- Policy should also take into account requirements of forecasted needs.
- Sites in proximity are not appropriate if they are not within the same ownership
- Sensitively designed contemporary buildings can be appropriate and should be allowed
- Policy should allow for staff housing beyond existing settlement boundaries where this is justified
- Policy should specify how development within the AONB will be treated
- Policy is too restrictive with regards to operational needs, e.g. outlier buildings may be required beyond groups of buildings

DM39 Local community facilities

- Support for policy
- Outdoor sports facilities are constrained by a lack of space, and further increases in population will place strain on existing facilities
- Request for specific facilities in the Purley on Thames area
- Policy should allow for loss where that loss has been considered as part of a wider review of an estate (e.g. NHS) and the facility is no longer needed
- The policy has weakened from the previous version
- Using viability in commercial terms as the sole measure to justify loss is problematic, suggest a criteria be added seeking alternative ownership or operation methods

- Should be clear that sale or rental prices be based on current sale/rental prices and facility condition, to avoid manipulating a lack of demand.
- Should be clear that local facilities are within walking distance, and in same geographical area as existing facilities
- Policy should provide a mechanism to allow for funding/assistance of new/expanded facilities, and facilities that would otherwise fail
- Provisions for loss should allow for a site specific approach and respond better to the market

DM40 Public open space

- Support for policy
- Should be clearer how open space will be encompassed within development
- Other organisations may be able to have a greater role in the provision of open space
- Policy should address maintenance of open space
- Should include provision for sports pitches
- Policy should be more flexible in responding to the individual circumstances of a proposal
- Should refer to blue infrastructure as well as green infrastructure
- Should be clear there are circumstances where transfer of open space to the Council is not practical/desirable
- Policy should be flexible to allow for a reduction in open space requirements for developments close to open space

DM41 Digital Infrastructure

- Should have clearer support for multiple technology options, including mobile networks, not just FTTP
- Provision relating to FTTP is unnecessary as it is covered by the buildings regulations, and is the responsibility of the Council and infrastructure providers
- Policy should specify the mobile telecommunications requirements of the development to be provided, not just considered

DM42 Transport Infrastructure

- Support for policy
- Both advocacy for more provision of electric charging points, and hesitancy that they may not be able to be provided in areas where electricity infrastructure is limited. Request reference to the latest building regulations to specify/clarify provision for electric charging points.
- Alternative travel/public transport should be more strategic and more fully supported in the policy
- Provision for road infrastructure shouldn't be precluded where this is necessary
- Policy could cross reference to SP23
- Unclear whether the policy sufficiently addresses the transport interventions necessary to support the growth in the LPR
- Opportunities to support sustainable transport and encourage modal shift have been missed

- Solely focusing on local journeys misses the fact that reducing the number of journeys would be more impactful for minimising travel, and could also prevent sustainable growth of rural employment sites.
- Should reference electric scooters in preparation for these becoming legal
- Policy should specifically allow for growth at the Theale Rail-Road transfer site
- Policy should be more specific as to what is required for different scales/types of development
- Conflict with DM35 and DM36 in terms of limited transport options in rural areas. Policy should include more flexibility to accommodate this.
- Policy should include more flexibility for a proportionate approach to be applied depending on the development
- Request for inclusion of improvements to the M4 and strategic road network in policy consideration

DM43 Theale Rail-Road Transfer Site

- Support for policy
- Concerns regarding access
- Policy should specifically allow for growth at the Theale Rail-Road transfer site

DM44 Parking

- Some support for policy, particularly for non-residential developments to be considered on a case by case basis
- Electric vehicle charging points should be as in the buildings regulations, no need to go further
- Parking for vans should be provided for
- Garages should be included in the parking provision, where they are large enough or alternative storage space is available
- Cycling and Motorcycling Advice and Standards for New Development referred to is not yet available
- Policy is too inflexible, should allow for site-specific circumstances and other factors such as on-street parking and proximity to public transport to be taken into account
- Solution for 0.5 parking space is needed – could be through shared spaces or delivered on aggregate throughout a development
- Should consider underground parking
- Parking standard is insufficient
- Should include parking requirements for dwellings larger than 4 beds.
- Concern over requirement for provide for ultra-low emission & car club vehicles and car sharing spaces
- Commentary on travel plans duplicates DM45 – should be deleted.
- Policy should require proposals to meet most up to date standards
- Clarification required for zone 2 residential dwellings

DM45 Travel Planning

- Support for policy
- Should include provision for electric charging points on public and private premises.
- Alternative travel should be more strategic and more fully supported.
- Provision for road infrastructure shouldn't be precluded where this is necessary.
- Policy is onerous and conflicts with the NPPF
- Clarification on monitoring requirements should be provided

Appendices

Appendix 1: Monitoring & Delivery

- Some concern about the appropriateness of some indicators used and some presentational amendments proposed

Appendix 2: Settlement Boundary Review

- Some support for approach taken and some objections
- Some suggestions from site promoters that boundaries should be further amended to accommodate additional opportunities for growth
- Some suggestions to amend the SBR criteria
- A number of specific suggestions to alter the boundaries in the following settlements – Boxford, Bradfield, Burghfield Common, Chieveley, Cold Ash, Donnington, Hampstead Norreys, Newbury, Pangbourne, Streatley, Thatcham and Yattendon

Appendix 3: AWE land use planning consultation zones

- To be considered under the issues raised under Policy SP4

Appendix 4: Designated Employment Areas

- A map of each DEA should be included

Appendix 5: Residential Parking Zones

- Boundary amendment proposed to Parking Zone 1 in Theale

Appendix 6: How policies are applied in a Neighbourhood Planning context

- Suggestion to remove the reference to the need to maintain a five year housing land supply

Appendix 7: Schedule of policies to be superseded/ deleted

- Request to carry forward the Core Strategy strategic site allocation at Newbury Racecourse

Appendix 8: Housing Trajectory

- The individual phasing of sites should be included
- Other issues to be considered under Policy SP12

Appendix 9: Glossary

- Some additional terms proposed

5. Consultation on Evidence Base and Supporting Documents

All evidence base and supporting documents were published alongside the LPR Proposed Submission version and therefore comments could have been made on them.

Where relevant, documents prepared as part of the [evidence base](#) have been subject to a specific consultation with technical experts, statutory bodies and other stakeholders as appropriate. Further details are set out in the individual documents themselves which are available on the Council's website.

6. Conclusion

The Council has considered all of the issues raised throughout the consultations to date on the West Berkshire Local Plan Review 2022-2039 and is confident that the plan to be submitted to the Secretary of State is sound and legally compliant.

20 January 2023

Name:

Development and Regulation

Address:

Council Offices
Market Street Newbury
Berkshire RG14 5LD

Our Ref: LPR Proposed Submission
Please ask for: Planning Policy Team
Direct Line: 01635 519111
e-mail:
planningpolicy@westberks.gov.uk

Dear Sir/Madam,

Consultation on the West Berkshire Local Plan Review 2022-2039 Proposed Submission

West Berkshire District Council is preparing new planning policies to plan for development across the District up to 2039 in its Local Plan Review (LPR).

What is the LPR?

The LPR sets out the Council's vision, objectives and spatial planning strategy for West Berkshire up to 2039. Within this context the:

- Development strategy sets out the overall approach for managing growth and change;
- Strategic policies set out the overarching principles for development focusing on: a place based approach; the environment and surroundings; delivering housing; and fostering economic growth and supporting local communities;
- Non-strategic site allocation policies allocate large, medium and small residential and mixed-use sites and also employment sites for development; and
- Development management policies provide more detail on specific issues.

The LPR is accompanied by a number of documents, including a Sustainability Appraisal which explains how alternative proposals were assessed and a Consultation Statement, setting out the outcomes of the consultation we have undertaken so far. It is also underpinned by a wide ranging evidence base.

On 1 December 2022 the Council approved the version of the LPR which it proposes to submit to the Secretary of State for public examination. **This is now being published for a statutory six week period of public consultation from Friday 20 January to Friday 3 March 2023.** This is known formally as the Regulation 19 stage. It allows local communities, businesses and other interested stakeholders to make final comments in advance of its submission to the Secretary of State.

Where can I view the documents?

All of the Proposed Submission documents and evidence base can be viewed online at <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>. The Proposed Submission LPR itself can also be viewed easily on our Local Plan Consultation Portal at <http://consult.westberks.gov.uk/portal>.

A paper copy of the Proposed Submission LPR documents will be available for public inspection at the West Berkshire Council Offices, Market Street, Newbury RG14 5LD (8:30am – 5:00pm Monday to Thursday and 8:30am – 4:30pm on Fridays).

How can I comment on the LPR?

The consultation on the Proposed Submission LPR starts on Friday 20 January 2023. It will run for 6 weeks and **close at 4.30pm on Friday 3 March 2023**.

Online: The easiest and most efficient way to respond to the consultation is via our online Local Plan Consultation Portal (<https://consult.westberks.gov.uk/kse/>). You will need to register, but then any comments you make will be stored in your account for your future reference.

Representation Form: (available electronically on the Council's website and in hard copy from the Council Offices in Market Street, Newbury) which will need to be returned by either: email to planningpolicy@westberks.gov.uk; or by post to the Planning Policy Team, Development and Regulation, West Berkshire District Council, Market Street, Newbury. RG14 5LD

All representations must be accompanied by your full name, address and contact details. Guidance on making representations is available with the representation form and on the online Local Plan Consultation Portal (<https://consult.westberks.gov.uk/kse/>). Representations should relate to the 'legal compliance' and 'soundness' of the LPR. They should specify the matters to which they relate and the grounds on which they are made. They may also be accompanied by a request to be notified at a specified address of the submission of the LPR for independent examination, publication of recommendations of the Inspector carrying out the independent examination and adoption of the LPR.

Only those representations that arrive at the address specified above within the six week period **ending 4:30pm Friday 3 March 2023** will be considered alongside the submitted LPR, which will be examined by an independent Planning Inspector.

What Happens Next?

All comments will be made available to view on the Council's Local Plan Consultation Portal and will be submitted later in 2023 to the Secretary of State, together with the submission LPR, supporting documentation and a summary of the main issues raised in the representations. A Planning Inspector will be appointed to carry out an independent examination of the LPR. The Inspector will use the National Planning Policy Framework and comments submitted during the Regulation 19 consultation to determine whether the LPR is sound and legally compliant.

If you require any further information please do not hesitate to contact a member of the Planning Policy Team.

Yours faithfully

Eric Owens
Interim Executive Director – Place

You have been sent this letter because you have previously made representations on the Local Plan or have asked to be kept informed. If you no longer wish to be contacted please let us know; if you do wish to be kept informed please e-mail planningpolicy@westberks.gov.uk (quoting your consultee ID – see top of letter) so that we can contact you in the future by e-mail.

**Planning and Compulsory Purchase Act 2004
Regulations 19 and 20 of the Town and Country Planning (Local Planning) (England) Regulations 2012
(as amended)**

**West Berkshire District Council
West Berkshire Local Plan Review 2022-2039 (LPR) – Proposed Submission (Jan 2023)**

Statement of the Representations Procedure

West Berkshire Council has prepared the West Berkshire Local Plan Review 2022-2039 (LPR) which it proposes to submit to the Secretary of State. The LPR is being published for consultation from **4:00pm Friday 20 January 2023 to 4:30pm Friday 3 March 2023**.

The LPR sets out the Council's vision, objectives and spatial planning strategy for the whole of the District of West Berkshire to 2039. Within this context the:

- Development strategy sets out the overall approach for managing growth and change;
- Strategic policies set out the overarching principles for development focusing on:
 - A place based approach
 - The environment and surroundings
 - Delivering housing
 - Fostering economic growth and supporting local communities;
- Non-strategic site allocation policies allocate large, medium and small residential and mixed-use sites and also employment sites for development; and
- Development management policies provide more detail on specific issues.

The accompanying Sustainability Appraisal is a statutory document that identifies the likely significant effects of the LPR and the extent to which implementation of the policies will achieve social, environmental and economic objectives. The Proposed Submission documents can be viewed at <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>. A paper copy of the Proposed Submission documents are available for public inspection at the West Berkshire Council Offices, Market Street, Newbury RG14 5LD (8:30am – 5:00pm Monday to Thursday and 8:30am – 4:30pm on Fridays).

Guidance on making representations is available with the representation form and on the online [Local Plan Consultation Portal](#). Representations should relate to the 'legal compliance' and 'soundness' of the LPR.

Representations can be made in writing or by way of electronic communications. We strongly advise that you use the following methods in order to ensure your representation is valid:

Online: Representations can be made online using the [Council's Local Plan Consultation Portal](#): <http://consult.westberks.gov.uk/portal>. This is the easiest and most efficient way to make representations.

Representation Form: (available electronically on the Council's website and in hard copy from the Council Offices in Market Street, Newbury). Please return by **4:30pm Friday 3 March 2023**:

- by email (planningpolicy@westberks.gov.uk); or
- by post to the Planning Policy Team, Development and Regulation, West Berkshire District Council, Market Street, Newbury. RG14 5LD

It is advisable that you follow the guidance notes which are available with the representation form and on the online consultation portal. All representations must be accompanied by your full name, address and contact details.

All representations should specify the matters to which they relate and the grounds on which they are made. They may also be accompanied by a request to be notified at a specified address of the submission of the LPR for independent examination, publication of recommendations of the Inspector carrying out the independent examination and adoption of the LPR.

Only those representations that arrive at the address specified above within the six week period **ending 4:30pm Friday 3 March 2023** will be considered alongside the submitted LPR, which will be examined by an independent Planning Inspector.

West Berkshire Council

West Berkshire Local Plan Review 2022-2039 Proposed Submission (Jan 2023)

Guidance Note for Making Representations

1. Purpose of the consultation:

The Proposed Submission West Berkshire Local Plan Review (LPR) has been published by West Berkshire Council in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The purpose of the examination is to consider whether the LPR complies with the relevant legal requirements, including the duty to co-operate, and is sound.

The consultation will take place between **Friday 20 January 2023 and 4:30pm Friday 3 March 2023.**

2. The Proposed Submission Documents

The Proposed Submission LPR and links to all the supporting information and evidence base can be viewed online at the Council's website: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>

A paper copy of the Proposed Submission documents is available for inspection at the West Berkshire Council offices, Market Street, Newbury, RG14 5LD (8:30am – 5:00pm Monday to Thursday and 8:30am – 4:30pm on Fridays)

3. How to respond

Responses to the consultation can be made:

- **Online** using the Council's Local Plan Consultation Portal: <http://consult.westberks.gov.uk/kse>. This is the easiest and most efficient way to submit your representations. You will need to be registered; please click on the 'Login/Register' button to log in or register your details. Additional guidance will be available on the Consultation Portal.
- **By email or post:** Representations can be submitted by completing the representation form available to download from <https://www.westberks.gov.uk/lpr-proposed-submission-consultation>. Please complete a separate representation for each part of the LPR on which you wish to comment. Representations should be sent to planningpolicy@westberks.gov.uk or the Planning Policy Team, Development and Regulation, West Berkshire Council, Market Street, Newbury, RG14 5LD.

Each representation, including any comments on the supporting information or evidence base, should relate to an individual policy or section of the LPR.

Part A of the representation form 'Your Details' must be completed for the representation to be registered.

Where there are groups who share a common view on how they wish to see the LPR changed, it would be very helpful for that group to send a single representation which represents that view, rather than for a large number of individuals to send in separate

representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

It should be noted that representations made to the LPR Regulation 18 consultation have already been taken into account in the production of the Proposed Submission LPR and a summary of the comments made will be submitted to the Inspector.

The consultation period starts on **20 January 2023** and in accordance with government regulations, closes at 4:30pm on **3 March 2023**. The Council is unable to accept responses made after this period. Only representations received within this period have a statutory right to be considered by the Inspector at the subsequent examination.

Matters to be considered before making representations

4. Legal Compliance and Soundness

In commenting on the Proposed Submission LPR, you are asked to make representations on whether the Plan is (a) **legally compliant** and (b) **sound**. Following the submission of the LPR, an Inspector will undertake an examination to consider whether it meets these tests.

(a) Legal compliance:

Legal compliance is judged against the requirements of Sections 19 and 20 of the Planning and Compulsory Purchase Act 2004 (as amended)¹, including compliance with the Council's Local Development Scheme², Statement of Community Involvement³ and the Town and Country Planning (Local Planning) (England) Regulations) 2012⁴.

In addition, the Planning and Compulsory Purchase Act 2004 requires a Sustainability Appraisal (SA) and a Strategic Environmental Assessment (SEA) to be carried out, this can be done in a single appraisal process. The objective of the SA is to promote sustainable development through the integration of social, environmental and economic considerations in the preparation of the LPR.

European legislation and government regulations mean that a Habitats Regulations Assessment (HRA) needs to be carried out for the LPR, in order to protect the integrity of internationally important nature conservation sites. The HRA assesses the likely impacts of the policies of the LPR and possible 'in combination' effects with other policies and proposals.

Under Section 33A of the Planning and Compulsory Purchase Act the Council also has a Duty to Cooperate with other local planning authorities and other prescribed bodies when preparing the LPR in order to address strategic planning issues relevant to their areas. Failure to satisfy this Duty will mean that plans cannot be adopted as an Inspector cannot remedy this through the examination process. The examination also assesses how effective cooperation has been as one of the tests of soundness.

All supporting documents can be viewed at <https://westberks.gov.uk/local-plan-evidence>.

(b) Soundness:

¹ Planning and Compulsory Purchase Act 2014 (as amended): <http://www.legislation.gov.uk/ukpga/2004/5/contents>

² Local Development Framework: www.westberks.gov.uk/lds

³ West Berkshire Council Statement of Community Involvement (2014): <https://westberks.gov.uk/statement-community-involvement>

⁴ Town and Country Planning (Local Planning) (England) Regulations) 2012: <http://www.legislation.gov.uk/uksi/2012/767/introduction/made>

The soundness of the LPR should be assessed against the following criteria from paragraph 35 of the National Planning Policy Framework⁵:

(a) Positively prepared: providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainability development.

(b) Justified: an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

(c) Effective: 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; and

(d) Consistent with national policy: enabling the delivery of sustainable development in accordance with the policies in this Framework.

If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy?
- Is the issue with which you are concerned already covered by another policy in this plan?
- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

5. General Advice

If you wish to make a representation seeking a modification to the LPR you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in section 4(b) above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the LPR should be modified.

You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues they identifies.

Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

6. Confidentiality

⁵ National Planning Policy Framework (NPPF): <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

All submitted representations will be made publically available, including on the Council’s website, with the person/organisation making the representation being identified. A copy of all submitted representations will also be made available to the Planning Inspectorate and the person appointed by the Secretary of State to conduct the examination.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the LPR. The Council therefore cannot accept anonymous representations – you must provide us with your name and contact details. Address details will not be made publically available. 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>.

The Council will also need to make sure that the names and full addresses of those making representations can be made available and taken into account by the Inspector. By submitting a representation, you confirm that you agree to this and accept responsibility for your comments. The Planning Inspectorate’s privacy statement for local plan examinations is available at <https://www.gov.uk/guidance/local-plans#plans-privacy-statement>

7. What happens next?

Following the end of the consultation period, the Council will summarise the main issues raised and submit the LPR, accompanying evidence and all submitted representations to the Secretary of State, who will appoint an Inspector to undertake an independent examination. The Inspector will assess whether the LPR meets the relevant legal requirements, complies with the Duty to Cooperate, and is sound. This submission is anticipated to take place in March 2023 with the examination hearings anticipated to take place later in 2023. Anyone stating in their response that they wish to participate in the examination will be notified of the arrangements. Participation at the examination is at the Inspector’s invitation only.

The representation form also allows you to indicate if you wish to be kept informed of the submission of the LPR for independent examination, the publication of the Inspector’s recommendations and/or the adoption of the LPR.


8. Contact information

If you require any further information on any aspect of the LPR, or wish to submit comments by email or post, please use the following contact details:

Telephone: 01635 519 111
Email: planningpolicy@westberks.gov.uk

Post: Planning Policy Team
Development and Regulation
West Berkshire Council
Council Offices
Market Street
Newbury
RG14 5LD

Website: <https://westberks.gov.uk/planning-policy>

| | |
|---|---|
|  | <p>West Berkshire Local Plan Review 2022-2039</p> <p>Proposed Submission Representation Form</p> <p>Ref:</p> <p><i>(For official use only)</i></p> |
|---|---|

| | |
|---|--|
| Please complete online or return this form to: | Online: http://consult.westberks.gov.uk/kse |
| | By email: planningpolicy@westberks.gov.uk |
| | By post: Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD |
| Return by: | 4:30pm on Friday 3 March 2023 |

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 | | |
| <i>Please note the following:</i> | | |
| <ul style="list-style-type: none"> • 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: | | |
| First Name:* | | |
| Last Name:* | | |
| Job title <i>(where relevant):</i> | | |
| Organisation <i>(where relevant):</i> | | |
| Address* <i>Please include postcode:</i> | | |
| Email address:* | | |
| Telephone number: | | |

*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.***

| | |
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| Your name or organisation (and client if you are an agent): | |
|---|--|

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

| | |
|--------------------|--|
| Section/paragraph: | |
| 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:

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 |
|---|-----|----|
| 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 | | |
| 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 | | |
| 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:

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.

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:

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 | <input type="checkbox"/> |
| The publication of the report of the Inspector appointed to carry out the examination | <input type="checkbox"/> |
| The adoption of the Local Plan Review | <input type="checkbox"/> |

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 | |
|------------------|--|-------------|--|

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

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Introduction and Background

Number of representations received: 47

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---|---|
| Basingstoke and Deane Council | Council has concerns about the shortfall in provision in terms of both employment, and gypsy and traveller pitch provisions, and how restrictions relating to the AWE are applied to the borough, and is keen to continue to engage in suitable discussions under the Duty to Cooperate. |
| Bracknell Forest Borough Council | Provided context for Bracknell Forest Local Plan |
| Reading Borough Council | Reading Borough Council (RBC) works closely with West Berkshire District Council (WBDC) as well as other neighbouring authorities to consider strategic planning issues in the area. WBDC, RBC, Wokingham Borough Council and Bracknell Forest Council have co-operated on a Statement of Common Ground that details the situation regarding strategic matters across the area. RBC therefore welcomes the publication of the West Berkshire Local Plan Review Proposed Submission and supports the overall approach of the plan. WBDC has engaged on the plan throughout its preparation, and we consider that the duty to co-operate as far as RBC is concerned has been fulfilled. |
| Royal Borough of Windsor and Maidenhead | <p>RBWM welcomes the intention of West Berkshire to accommodate its housing need in full and support the inclusion of a buffer to allow for delays and non-implementation that may occur.</p> <p>On Gypsy, Traveller and Travelling Show People pitch provision, note that the identified shortfall is intended to be addressed via the preparation of a separate DPD. We welcome West Berkshire's approach to meet the accommodation needs of these groups in full.</p> <p>Reiterate that the Royal Borough is unable to assist in meeting some or all of your unmet employment land and space needs over the plan period.</p> <p>Pleased to see the West Berkshire Local Plan Review includes a policy (SP5) on responding to climate change, in particular setting ambitious expectations that new development will achieve net zero operational carbon (policy SP5 c.) and 10% Biodiversity Net Gain (policy SP11).</p> <p>No concerns or objections to the Regulation 19 version of the Local Plan Review.</p> |

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| Slough Borough Council | <p>We support the proposal for West Berkshire to meet its identified housing requirement in full within the district. Slough Borough Council is not in the same housing market area as West Berkshire, is unable to meet its housing need in full and is cooperating with a neighbouring authority. Should West Berkshire reduce its housing land provision this would potentially increase the unmet needs that will need to be accommodated and could exacerbate development pressures across the sub-region.</p> <p>We support the commitment in the Plan to review the provision of employment land again at the first five year review of the plan. Slough Borough Council is not in the same employment market area as West Berkshire, is unable to meet its employment needs in full and therefore is unable to assist with West Berkshire’s unmet needs. These will potentially increase the unmet needs that will need to be accommodated and could exacerbate development pressures across the sub-region.</p> |
| Swindon Borough Council | <p>SBC is supportive of the plan’s broad ambitions – the full application of the strategy, plan policies and other tools, may support local economic ambitions and reduce shortfalls.</p> <p>At this stage, Swindon Borough Council is unable to assist with meeting West Berkshire’s office and industrial shortfalls. Welcome further DtC discussions.</p> |
| Test Valley Borough Council | <p>Unable to assist in meeting the shortfall for employment land and floorspace. In any case, it would not be appropriate or suitable as the two authorities are in separate Functional Economic Market Areas and there is only a low level of economic interaction both in terms of commuting/labour market and operation of commercial land and property markets. It is not clear whether the office and industrial deficits relate to Newbury or the edge of Reading.</p> |
| Wiltshire Council | <p>Critically important for the plan to include policies to support the retention, intensification, and regeneration of existing employment sites/areas, as well as encouraging and facilitating windfall sites.</p> <p>Understood that West Berkshire’s need for employment needs are at a local level, therefore it will be important for this to be provided for locally or in areas that are spatially well located to Newbury and other urban parts of the district. It is not considered that Wiltshire is an appropriate location for such development, where the character of the area is largely AONB. Wiltshire Council is unable to assist in meeting the shortfall for employment land.</p> |
| Wokingham Borough Council (WBC) | <p>New allocations for industrial use insufficient to meet the full identified needs for industrial land and no specific land is identified to provide for office use. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs. It is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated and requests continued engagement as part of the duty to cooperate.</p> <p>Regarding retail, WBDC’s existing evidence from 2016 identified a significant need, and it is not clear how far this has been met, or whether the identified needs remain appropriate. WBC stresses the importance of WBDC’s evidence being updated as soon as possible and the Plan being reviewed as necessary to address this in the short term.</p> |

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| | <p>WBC broadly supports approach to the provision of Gypsy and Traveller sites and supports the production of the separate DPD to meet needs in full, and raises no issues of soundness in relation to the Plan. Supports the commitment to fully addressing Travelling Showperson need.</p> |
| <p>Bucklebury Parish Council</p> | <p>Timing of consultation. Illogical to progress until changes to national policy are finalised. Surprising that members did not require LPR to be taken back to full council for approval prior to submission. Consider LPR is not ready for examination, which is a matter for legal challenge.</p> <p>WBC notified interested parties that some content on the WBC web site would be unavailable on 21st and 22nd January because of planned work on maintenance of the site. The effect is to shorten the Reg 19 consultation by 2 days to less than the 6 weeks required.</p> <p>Settlement Boundary Review: BPC claim that not consulted on review and their response was not accurately recorded and ignored.</p> <p>Site Selection Process: Little evidence of rigorous process with no reference of the change in site selection process following the decision to drop the decision to make a large allocation at Grazeley. Most recent version of HELAA was not made available to councillors when the decision to launch the regulation 19 consultation was made. Previous versions of the HELAA from February 2020 and December 2020 have not been made available as part of the evidence base for the plan.</p> <p>AWE and Aldermaston: the approach taken to the DEPZ has been inconsistent and subject to significant changes in the period leading up to the regulation 19 consultation. BPC also has concern over the consultation process with AWE, particularly over the strategic allocation of a scale of development the size of North East Thatcham which is within the Outer Consultation Zone.</p> <p>Development in Countryside and Strategic Gap: A Site Selection Background Paper (Reg18 SSBP) has not been published as part of the regulation 19 consultation. Not consistent application of criteria in SSBP, particularly regarding strategic gap between Bucklebury and Thatcham.</p> <p>Siege Cross: puzzling that a site for 500 houses should be heavily resisted by WBC in earlier appeal and now subsequently promoted for a significantly larger scheme. WBC were particularly concerned about the effect of the Siege Cross development on the wider landscape and on the AONB, yet now propose site that abuts AONB and implies no harm.</p> <p>Thatcham Growth Study: BPC understand that the promoters of the NE Thatcham site contributed financially to the David Lock Associates report. The report contains material inaccuracies such as disqualifying alternative sites by failing to properly consider the benefits. Regarding the vision work by Iceni, this should have preceded the site selection and fails to be more than confirmation of a decision already made.</p> <p>Sustainability Appraisal: The assessments made of the impacts and benefits of the allocation of North East Thatcham against the sustainability objectives are seriously flawed and lack any credibility or rationality. BPC has prepared its own analysis - an accurate or reasonable assessment leads to the site performing poorly against all SA objectives. Site selection should be an iterative process that is informed by the SA - a matter of legal compliance.</p> |

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| | Reasonable Alternatives: No option for no development at NE Thatcham or a further lower amount. No option for 250-500 dwellings along the southern end of the site in small areas of development adjacent to the Bath Road has been considered. |
| Compton Parish Council | The Duty to Cooperate has not been complied with as there is poor evidence of inclusion of NDPs or cooperation with local communities. |
| Newbury Town Council | Pleased that the Planning Authority had given reasonable consideration and weight to many of the responses that the Council made to the Regulation 18 Consultation. However, entire process flawed, due to inaccurate information and proposed changes to the NPPF (support motion going to Council on 2 March). |
| Speen Parish Council | Extremely impressed with the level of detail and amount of work included in the plan. Concur with the prioritising brownfield sites for development, e.g. Sterling Cables. |
| Thatcham Town Council | The Town Council believes that it is not ready for independent examination (as per Section 20 (7) of the Planning and Compulsory Purchase Act 2004). We therefore urge West Berkshire Council to delay the submission of the draft Local Plan to the Secretary of State, so that these matters can be addressed. This would also enable it to take into account the review of the National Planning Policy Framework, on which the Government is currently consulting. DtC Statement is described as interim. Several places in the document suggest the intention to modify before submission for examination. If the Duty to Cooperate Statement is modified after the consultation period, as appears to be the intention, the amended document would not be legally compliant with Regulation 19. We are not aware of the Duty to Cooperate Statement (and therefore the Statement of Common Ground that it contains) having been made available prior to 6 th January 2023 as required by Para 27 of NPPF. |
| Tilehurst Parish Council & Tilehurst NDP Group | 1.29 – suggests the plan will be updated before submission to SoS, however the understanding is that the submitted document should not change from the consultation version. Policies Map and other maps difficult to read. Presentational concerns |
| Environment Agency | We stated in our response at the regulation 18 consultation that a standalone water course policy should be included in this local plan. This is to provide more protection for the water environment in West Berkshire as required by NPPF Section 15. This is particularly important given the nationally and internationally protected sites that includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats within the Kennet floodplain. |
| Historic England | <u>Sustainability Appraisal</u> Page 9: Table 4 – row on historic character opening sentence doesn't make sense. The rationale for including text on new development in the vicinity of nuclear installations and the link to historic character is unclear. Page 15: minor wording change from 'significant interest of historic assets' to 'significance of historic assets' to reflect NPPF. Page 15: Formatting – two bullet points on heritage indicators have been merged. |

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| | <p>Page 15: we advise a minor change as follows to the subobjective to align more closely with the NPPF: “To protect or, conserve and enhance the built and historic environment including sustaining the <u>significance</u> significant interest of heritage assets”</p> <p>Page 15: particularly welcome indicator relating to % of up to date CAAs.</p> <p>Pages 73 & 74: SA refers to ‘heritage benefits’ in relation to certain allocations but these need to be made clearer for them to be realised.</p> |
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General Consultation Bodies:

| Consultee | Main issues |
|---|---|
| North Wessex Downs AONB | Support |
| Campaign to Protect Rural England (CPRE). | <p>Support the clarity and accessibility of the documentation, particularly the supporting information.</p> <p>Additional air quality impact evidence should be provided for the proposed developments and nearby areas of important landscape and wildlife interest.</p> <p>Housing needs can be adequately met on brownfield land rather than sacrificing greenfield land, particularly in and around the AONB.</p> <p>Many of the 25 approved development sites have now been built on and it would be helpful if years of completion were given.</p> |
| Canal And River Trust | The trust is supportive of the plan and finds it sound and legally compliant. |
| Newbury District Ornithological Club | <p>The consultation, selection process, and appraisals are severely flawed and lack evidence.</p> <p>Decision-making is undemocratic by failing to secure full Council sign off before submission to the secretary of state.</p> <p>Government consultation on NPPF is likely to reduce housing numbers and it is reckless to proceed in the face of this.</p> <p>Instead, progress on the LPR should be paused.</p> |
| Home Builders Federation | <p>RE. Reading’s unmet housing need, no Council in the West Berkshire Housing Market Area (HMA) has committed to addressing this small shortfall. This does not give much confidence as to the effectiveness the co-operation in this area.</p> <p>Instead of addressing this issue the Councils have, contrary to the expectations of PPG, pushed back consideration of this issue to a future plan review.</p> <p>What is also lacking within the statement of common ground or the Duty to Co-operate Statement is any recent evidence of ongoing cooperation and engagement. The Governance section of the SoCG for example points to a West of Berkshire Strategic Planning Group but we could find no evidence as to when these meetings have occurred, whether the key strategic and cross boundary issues were discussed and the outcome from these discussions. The Council will need to provide more detail if it is to show that it has co-operated effectively and met its legal duties.</p> <p>The Plan period is not consistent with national policy as it is likely to be less than 15 years on adoption</p> |

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| Liberal Democrat Group | The Liberal Democrat Group, which forms the main opposition at this time but could be in control of Council policy by the time there is an Inspector appointed is minded to pause the process for West Berkshire's Plan until national policy becomes clearer. |
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Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | <p>Other Local Plans are much easier to navigate and understand – better and simpler structured.</p> <p>Many of the climate change policies and housing policies are scattered throughout, and the DM policies could be more logically grouped.</p> <p>Many documents were late to arrive; some have had no input or consultation. This renders the plan unsound as it is not positively prepared.</p> <p>This consultation should go back to Council before submission.</p> <p>Not enough attention has been given to building on or near natural watercourses or groundwater bourns.</p> <p>Difficult to assess the plan for soundness in terms of compliance with national policy as the NPPF is under consultation.</p> <p>Whether the LPR will meet this going forward is unclear. Would prefer the submission to be delayed.</p> <p>The map of brownfield sites has disappeared; with only a spreadsheet it is hard to visualise.</p> <p>Newbury neighbourhood development plan could take years to develop and as the major settlement it is doubtful if it could ever truly reflect the wishes of its residents.</p> <p>Chapter 5 should be renamed Climate Change and the Natural Environment.</p> <p>As a leading Tech Town and Area we may need a Policy around Data Centres.</p> <p>Would like to see something specific in the Planning framework to support the Dementia Friendly status that West Berks has.</p> <p>Hard to access the representation form and the consultation was not advertised widely. It has been missed by many residents that will be affected.</p> <p>Due process has not been completed - house allocation information was advertised after the plan, which is the wrong way around.</p> <p>The process of making representations is not straightforward to take part in – not inclusive or trying to work with affected communities.</p> <p>Artificial deadlines mean the plan is being rushed through.</p> <p>Support CPRE assessment of ability to deliver more housing on brownfield sites, e.g. as an afteruse along with commercial land for the allocation for mineral working (Chieveley Services) where the land is already blighted.</p> <p>Plan doesn't emphasise the better use of height in increasing density, which is a good solution.</p> <p>Insufficient information about who provided information, who paid costs and who put it together.</p> |

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| | <p><u>Glossary</u> Should include: Rural, Countryside, Heritage, Green Gaps, Designated Employment Areas, Residential Parking Zones.</p> <p><u>Consultation Statement</u> Not been a programme of public exhibitions in areas of high impact.</p> <p><u>DtC Statement</u> Doesn't include Town and Parish Councils. Documents that relate to a Town or Parish should be consulted with relevant council for their input and engagement.</p> <p><u>EqlA</u> Inadequate for key sub areas and key settlements and missing sites that should be in the LPR.</p> <p><u>HRA</u> As GI framework is missing and this document focuses on designated sites, there is an incomplete coverage of Local Nature Recovery Networks, Wildlife Corridors, non-designated nature based public open space and private green space.</p> <p><u>Policies Map</u> Very detailed and small in scale. Doesn't have a postcode search facility Newbury is very crowded with designations – needs a separate map.</p> <p><u>Statement of Representation Procedure</u> The LPR was not ready for consultation and should have been delayed.</p> <p><u>Sustainability Appraisal</u> The previous 2020 SA commented how the policies were too weak. However they have now been overwritten and repeat national policy. Not enough residential and employment site allocations for Newbury make the plan unsound. For Information: The Council published several versions of the draft Local Plan during January 2023. Potential respondents were not informed of this. Am aware of material differences between the versions, e.g. first paragraph of SP17. If representations do not accord with the wording of the draft LPR this might be because a respondent has inadvertently used an earlier version of the document.</p> |
| <p>Cllr Alan Macro</p> | <p>The West Berkshire Strategic Transport Model and the Air Quality Assessment in the Evidence Base have not been updated for the following:</p> <ul style="list-style-type: none"> • End date for LPR revised from 2037 to 2039 • Additional housing sites proposed for Theale, totalling 100 units • Removal of housing sites proposed at Reg19 stage because of imposition of AWE DEPZs • Removal of proposed housing site at Pincents Hill, Tilehurst • Removal of proposed office employment site adjacent to M4 J12 • Policies in this LPR that allow office development in Designated Employment Areas, leading to increased private car journeys to/from the areas |

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| | <p>Modelled mitigations in the Transport Model are limited to vicinity of NE Thatcham strategic site and do not take into account the housing allocations proposed around Newbury and Theale</p> <p>Evidence base should be updated and LPR should then be reviewed.</p> <p>Representation includes detailed comments on the Air Quality Assessment and the Strategic Transport Model</p> <p>The policies map does not clearly show the following for Theale:</p> <ul style="list-style-type: none"> • primary shopping area • three conservation areas |
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Landowners, site promoters and developers:

| Consultee | Main issues |
|--|---|
| Barton Willmre obo Yattendon Estates | <p>It is noted that the Council held an Extraordinary Meeting on 2nd March to decide whether they proceed or withdraw the current consultation. The related agenda item itself describes the current Local Plan consultation as containing serious 'omissions and ambiguities' which make the plan unsound. The flaws appear to principally relate to the northeast Thatcham allocation and how processes were followed including communication of key information to Council Members. The housing number relevant to this allocation is also in doubt. The ultimate vote resulted in the motion being lost and the Plan consultation to continuing. These important matters of soundness and related procedural matters will need to be addressed prior to the submission of the plan for examination.</p> |
| Bell Cornwell obo Central Corporation Projects Ltd | <p>Air quality assessment, employment background paper, flood sequential test report and housing background paper not finalised or published until after final decisions were taken on the strategy and proposed allocations.</p> <p>Errors in evidence base which could contribute to LPR being found unsound. Site Selection Methodology refers to the plan period up to 2037, rather than 2039. The Air Quality Assessment is based on a plan period up to 2037, so has not assessed pollutant concentrations for the full plan period. The work identified to further analyse air quality, in conjunction the revised transport model forecasts for 2039, should be carried out prior to Reg 19 consultation and submission to Examination.</p> |
| Bell Cornwell LLP obo Hathor Property Limited | <p>Site Allocations have been selected and the plan finalised for consultation prior to finalisation of HELAA site assessments; decision of members to move forward to consultation on Reg 19 Plan taken in the absence of knowledge of the range of site assessments/ options available to accommodate development.</p> <p>Public comments invited until 3 March, in the knowledge of proposed meeting the evening of 2 March to decide whether to abandon the consultation/ draft strategy. This will inevitably have impacted decisions taken on whether or not to spend time/ funds pursuing representations on the plan, leading to a flawed consultation process.</p> <p>Errors in evidence base contributing to flawed consultation process, with stakeholders unable to review/ comments on full assessment of the impact of the proposed development strategy.</p> |

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| Boyer obo Darcliffe Homes | <p>The plan would need to be adopted in 2023/24 if it is to have a full 15 years from the point of adoption as required by paragraph 21 of the National Planning Policy Framework. In order to ensure the plan period is consistent with national policy then an extra year should be added with the plan period ending in 2039/40.</p> <p>As a general principle, the plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria. This would assist the accessibility and the useability of the draft plan, improving the effectiveness of the document substantially.</p> <p>Do not consider the conclusion of not undertaking any action to remedy Reading Borough's unmet need until such time as a future plan review is undertaken satisfies the base expectation and requirement of co-operation. We are also concerned by the apparent lack of ongoing co-operation and engagement.</p> |
| Boyer Planning obo Sovereign Housing Association | <p>Effective and on-going joint working undertaken by West Berkshire District Council with the other Western Berkshire HMA authorities, in particular illuminated through the preparation of the SoCG. Sovereign considers that the LPR is <i>positively prepared</i> and the product of an <i>effective</i> and robust process of cooperation between the authorities.</p> |
| Carter Jonas obo the Trustees of the Frank Wallis Estate | <p>Plan period: the proposed September 2024 adoption date in the Local Development Scheme is optimistic. Therefore, to ensure the plan period is consistent with national policy, prudent for the Local Plan to seek an end date of 31st March 2040 and the strategic policies including housing requirement and Vision adjusted to this date</p> |
| Carter Planning obo RLA Jones | <p>More details and further cooperation between Authorities would have been helpful. LPR deals with the Council's housing need but does not explain in detail how adjoining Authorities (such as Reading, Swindon and Wokingham) will require housing need to be met in West Berkshire District and if so what the quantum of that additional housing would be and where it would be located. Issues of Reading's unmet housing need and WBC no being able to meet its own employment needs.</p> <p>The HELAA does not include Bracknell Forest and a single study covering the Housing Market Area would have been the most appropriate approach for consistency.</p> |
| Nexus Planning for Croudace Homes | <p>Consider that the LPR should plan to meet Reading's unmet need now, rather than loosely committing to do so at a later date.</p> |
| Rectory Homes | <p>Due to the lack of commitment to consider the unmet needs arising from Reading there has not been effective cooperation between the relevant authorities under DtC</p> |
| Savills – on behalf of Crest Nicholson Partnerships and Strategic Land. | <p>Considered that the Local Plan should address regional industrial and logistics needs. That need can be achieved through sites outside the West Berkshire Council authority area.</p> |
| Thakeham Homes | <p>Para 1.19: welcomes the approach to keeping the HELAA updated, however, it is noted the evidence base for the HELAA remains unchanged. Sites are therefore, for example, being assessed against the 2011 Landscape Sensitivity Assessment; a document which is now over twelve years old. Considers the evidence supporting the HELAA is out of date and not a sound approach.</p> |

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| | Reading's unmet need appears to not include the Government's proposed method for calculating housing need and therefore cannot be considered a sound approach. It is also not clear how this unmet need will be delivered. |
| Tim North & Associates Ltd. | Consideration should be given to whether the needs for specialist housing for older people can be more easily accommodated in West Berkshire where they cannot be met in neighbouring authorities. |
| TOWN obo landowners of Land East of Pincents Lane | In principle the shortfall of 230 dwellings must be met within the West of Berkshire Area. Policy H1 of the adopted Reading Local Plan envisages that individual Local Plans will specify where development will be located yet there is no such specification or allocation. No agreement between the four LPAs on how this current shortfall might be met across the HMA. Furthermore, RBC will face an uplift in its figures of 35%. Whilst there may be no requirement for adjoining LPAs to accept this element of unmet need it will still serve to increase the pressure on the HMA as a whole. |
| Turley obo Hathor Property | The decision to take forward the Regulation 19 LPR to consultation took place at a Full Council meeting in December 2022, yet the updated HELAA report was not published until January 2023. This means that Full Council made a decision including proposed site allocations, without having had sight of the updated HELAA (2023). Question the soundness of the proposed allocations, in the absence of Members having access to the full evidence base for the site selections. Highly unlikely the LPR will be adopted a year from now. Therefore, to ensure the plan period is consistent with national policy an extra year should be added with the plan period ending in 2039/40. No mention is made as to how Reading's unmet need will be met - this relatively small amount of additional supply should have been included either wholly or in part within the Council's housing requirements. |

Summary of issues raised:

Support expressed for the level of detail and amount of work included and the clarity and accessibility of the documentation, particularly the supporting information.

There were a number of objections:

The timing of consultation and decision-making process:

- Illogical and reckless to progress until changes to national policy are finalised. Artificial deadlines mean the plan is being rushed through.
- Decision-making undemocratic by failing to secure full Council sign off before submission
- No record of consultation on HELAA January 2023 and not available to councillors when the decision to launch the regulation 19 consultation was made
- Air quality assessment, employment background paper, flood sequential test report and housing background paper not finalised or published until after final decisions were taken on the strategy and proposed allocations.

- Plan unlikely to be adopted by 2024 so to ensure the plan period is consistent with national policy an extra year should be added to the plan period

HELAA and Site Selection:

- Numerous points from the HELAA are poorly summarised or not included in the site assessments.
- A Site Selection Background Paper (Reg18 SSBP) has not been published as part of the regulation 19 consultation.
- Some evidence base for HELAA is now dated.
- Puzzling that Siege Cross resisted by WBC in earlier appeal and now promoted for significantly larger scheme

SA/SEA

- Inadequate assessment of reasonable alternatives
- Assessments made of the impacts and benefits of the allocation of North East Thatcham against the sustainability objectives are seriously flawed.

Other Evidence Base:

- West Berkshire Strategic Transport Model and the Air Quality Assessment have not been updated. Traffic Desk based assessments are not appropriate and surveys should be carried out.
- Evidence relating to GI framework is missing
- Claims that parishes not adequately consulted on settlement boundary review
- Inadequacies in Thatcham Growth Study

The Consultation

- Hard to access the representation form and the consultation was not advertised widely.
- The process of making representations is not straightforward
- Not been a programme of public exhibitions
- Not sufficient consultation with town and parish councils
- Council meeting on evening of 2 March, to decide whether to abandon the consultation/draft strategy, will have impacted decisions on pursuing representations, leading to a flawed consultation process.

Presentation

- The plan would benefit from consistent numbering, in relation to the paragraphs, policy criteria, and sub-criteria.
- Maps throughout the document have no scale; some have no north arrow. Size of text makes Crown copyright illegible.
- Some policies are very long, and no paragraph numbers makes it difficult to precisely refer to them.
- Policies could be more logically grouped

- Policies Map - Too many layers displayed simultaneously and impossible to read detail, doesn't have a postcode search facility and Newbury is very crowded and needs a separate map.
- Glossary – several suggestions for additions to Glossary.

Duty to Cooperate

- There were relatively few issues raised about the duty to co-operate process, although several developers and promoters of sites as well as the Home Builders Federation referred to the outstanding unmet need from Reading not being catered for by allocations in the LPR.
- Reading Borough Council supports the WBC approach and considers it has met the duty to co-operate requirements.
- Several other local authorities have said they cannot assist WBC to meet its identified office and industrial needs.
- The approach to dealing with Gypsy and Traveller needs is accepted by several councils.
- One council has concerns about the shortfall in provision for employment, gypsy and traveller pitch provisions, and how restrictions relating to the AWE are applied to the borough

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Context

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|-----------------|---|
| Cllr Alan Macro | Paragraph 2.1 should be expanded to include the constraints imposed by the flood plains and the Detailed Emergency Planning Zones (DEPZs) around the two Atomic Weapons Establishments. Also, the nutrient neutrality zones should be included. |

Landowners, site promoters and developers: None

Summary of issues raised:

- Amendments proposed to para 2.1

Council response: The comment has been noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Vision

Number of representations received: 16

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|--------------------------|---|
| Chieveley Parish Council | Broadly support vision and overall objectives. |
| Thatcham Town Council | <p>West Berkshire Strategic Vision 2050.</p> <p>Document prepared to meet new requirement in paragraph 22 of July 2021 NPPF revision. The two baseline reports contained significant errors and shortcomings but neither has been updated. Since the report was commissioned, the definition of the number of dwellings for North East Thatcham has changed. The inclusion of these reports by West Berkshire Council in the evidence base indicates that it believes that the new provision in paragraph 22 of NPPF is still applicable, but there is no mention whatsoever of this visioning work in the LPR Proposed Submission. Nothing in this document looks beyond the end of the next plan period in 2039. It appears that the Vision 2050 study was commissioned as a ‘tick-box exercise’, to give the token appearance of compliance with NPPF Paragraph 22, rather than to provide a basis for the development of policies within the plan. Therefore, LPR Proposed Submission cannot as a whole be in compliance with Paragraph 22. To remedy this requires a review of many of the policies within the document, which is beyond what can be addressed through modification at examination. It is clear that the Local Plan is therefore “not ready for independent examination”.</p> |
| Historic England | 3.4 – Welcome reference to conserving and enhancing heritage assets but note that the built environment is not synonymous with the historic environment. Suggest addition of the word ‘historic’ in the final sentence of this paragraph. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Bio Cap | Plan doesn't place enough emphasis on the creation of high quality habitats relating to net gain requirements. There are real opportunities in the district to create gains in the countryside but this requires encouraging off-site habitat creation, contrary to the current method of policing on site habitat creation. Off-site habitats often perform better in the long-term than those provided on site and provide long term income opportunities. |
| Various individuals/ local residents | Currently several vision documents – Vision to 2036, Newbury Vision to 2026, West Berkshire Strategic Vision to 2050. This makes commenting on the vision very complex. Concern that the minor improvements identified in LTP and Transport for SE SIP 2050 will not be sufficient for Newbury to function effectively and the vision will be hard to achieve. 3.3 – RSA10 is contrary to the Vision as the development will impact negatively on infrastructure, rendering it unsustainable. Proposal will blur the division between Theale and Calcot, affecting community cohesion, health and wellbeing. Will eliminate a natural area used for walking and exercising, impacting negatively on residents' mental health. Need for long term traffic management and housing vision |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|---|
| Barton Willmore (now Stantec) for Sulham Estate | The key themes within Council's Vision and, in particular, the focus on community cohesion, health and wellbeing are noted. The energy efficiency, landscape, heritage and biodiversity elements of the vision are also noted and welcomed. Considers promoted site Land at Hall Place Farm, is highly consistent with the Vision |
| Carter Jonas for Wallis Trustees | Generally supports the Vision and considers an additional residential allocation east of Waller Drive, Newbury would help realise it. |
| Nexus for Croudace Ltd | Strongly supports the proposed Vision, to make available housing of different types, sizes, tenures and affordability a priority in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability. |
| Pro Vision obo <ul style="list-style-type: none"> • Newbury Racecourse Plc. • Rivar Ltd. | Strategic Objective 2: Housing The housing target is insufficient to boost the supply of housing and provide flexibility, address affordability and need for affordable housing in the district and the housing supply would likely lead to a housing shortfall below the LHN, particularly due to reliance on windfall sites and the large strategic sites. Council's strategic policies of the Local Plan (i.e. Policy SP12 and the strategic site allocations etc.) do not currently deliver the Plan's vision and objectives and are unsound. |
| Solve Planning for Harry West Investments Ltd. | Particularly support the aim of approaching development based on three spatial areas. |

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| Southern Planning Practice for Saunders Family | Support vision set out at 3.1 – 3.4, particularly the priority to make available housing of different types, sizes, tenures and affordability. To meet this need, the Council should also look at all settlements and available land in sustainable locations, not just urban areas. |
| Thakenham Homes | Agrees with the importance of delivering a range of housing, and agrees that they need to come forward in the most sustainable locations, which is why it is critical that the allocated sites set out in the Reg 19 Local Plan are available, suitable and achievable and therefore deliverable. This is even more important for the villages in the AONB where the presumption in favour of sustainable development does not apply, and therefore windfall applications are unlikely to come forward outside of the Development Plan. Supportive of newly proposed text that housing be made “carbon neutral”. |
| Turley for Panattoni | Panattoni support the Vision and Objectives set out within the Local Plan but raise significant concerns about whether these can actually be met given that there remains a shortfall of 32,709sqm of industrial land. Panattoni’s position that additional land needs to be allocated to at least meet the shortfall and provide a sufficient buffer to ensure a resilient economy. |
| Woolf Bond Planning for JPP Land Ltd. | Previous inconsistency of the vision with NPPF 78 by not effectively supporting growth in villages. This was amended and the current proposed vision is endorsed. |

Summary of issues raised:

Broad support for vision

Issue raised include:

- Lack of reference to West Berkshire Strategic Vision 2050 prepared to comply with NPPF para.22. Other Council Vision documents make commenting complex.
- Plan doesn’t place enough emphasis on the creation of high quality habitats relating to net gain requirements.
- Council’s strategic policies of the Local Plan (i.e. Policy SP12, the strategic site allocations and shortfall of industrial land) do not currently deliver the Plan’s vision and objectives

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR: Strategic Objectives**

Number of representations received: 14

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--|--|
| Chieveley Parish Council | Broadly support vision and overall objectives. 8. Landscape – any landscape-led development should be appropriate and deliver wider environmental, economic and social benefits, while having regard to local needs. Particularly support objectives 1, 3 & 8. |
| Theale Parish Council | Housing – an affordable housing survey needs to be carried out for Theale and the whole district so the statement is backed by evidence. Town Centres – implies that a shopping centre makes a community prosperous without considering social, health and wellbeing factors. Theale has always been overlooked for leisure and community facilities, and suffers a lack of access and public transport to be able to support large scale development. Infrastructure – Theale does not have the infrastructure to support large amounts of new housing. Specific infrastructure needs should be mentioned in the plan. Recent development in Theale has not included any improvements to infrastructure, except the primary school. |
| Tilehurst Parish Council & Tilehurst NDP Group | Modifications to objective 2 are welcome. |
| Historic England | Heritage – the heading refers to ‘heritage’ whereas the text refers to the built, historic and natural environments. |

General Consultation Bodies:

| Consultee | Main issues |
|------------------|--|
| BBOWT | Disappointed there is no strategic objective to address biodiversity decline – this should be a key strategic objective. |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | <p>Nature Recovery – huge gap in relation to the preservation of habitats, which should be a further objective, or is should be included in fewer, more strategic objectives.</p> <p>Nature recovery should receive more prominence, particularly as the AONB is not species rich and in relation to the new Environment Act. No work has been undertaken on green/blue infrastructure since the old plan.</p> <p>Economy – would be more meaningful and measureable if renamed employment and economic development.</p> <p>Town Centres – clearer if renamed settlement centres. Should list those of focus for the LPR period. Need clear definition of settlements that are designated as rural as they will have different design requirements than urban settlements.</p> <p>Culture – could be renamed Leisure and Culture. 2022 Leisure strategy is not submitted as part of the evidence base therefore the plan is not effective and it identifies sites that are not included in the leisure strategy.</p> <p>Heritage – Could be renamed ‘Heritage and Historic Environment’. Heritage is often misunderstood, and is not included in the glossary of terms.</p> |
| Bio Cap | Biodiversity Net Gain and carbon neutrality requirements, creation of flood mitigation and climate change mitigation will all create ‘green jobs’ and long term employment opportunities as habitats will be required ‘in perpetuity’. Therefore, there should be a specific policy in the economic growth objective. |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|--|
| Southern Planning Practice for Saunders Family | Strategic objective to housing has been made more specific. Such an amendment may assist the achievement and maintenance of a 5 year housing land supply and resist speculative unsustainable development. |
| White Peak Planning for Bloor Homes | Support |
| Pegasus for Donnington New Homes | Issues raised under Policy SP12 |
| Carter Jonas for Wallis Trustees | Generally supports the Objectives and considers an additional residential allocation east of Waller Drive, Newbury would help realise them. |
| Thakenham Homes | Supports the housing strategic objective |

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| Nexus for Croudace Ltd | Supports objectives relating to housing, sustainable and quality development, green infrastructure and healthy living, transport and infrastructure |
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Summary of issues raised:

Broad support for strategic objectives.

Issues raised include:

- No strategic objective to address biodiversity decline
- Economy - suggestion to rename as employment and economic development. Should be policy in objective regarding creation of 'green jobs'
- Heritage – the heading refers to 'heritage' whereas the text refers to the built, historic and natural environments

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Development Strategy Background

Number of representations received: 7

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|--|--|
| Tilehurst Parish Council & Tilehurst NDP Group | Figure 1 (West Berkshire Constraints) – answer Map has no scale. Legend refers to DEPZ, but this abbreviation is not explained until 4.16, several pages later in the document. |
| Historic England | Reference should be made to Registered Parks and Gardens, rather than historic parks and gardens, for accuracy and consistency with the Policies Map. Figure 1 (or perhaps the Policies map?) should also include Scheduled Monuments. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|-----------------|---|
| Simon Pike | Paragraph 22 requires that policies should be set within a vision that looks further ahead (at least 30 years)” and this ‘setting’ is totally absent from the LPR. To remedy this requires a review of many of the policies within the document, which is beyond what can be addressed through modification at examination. It is clear that the Local Plan is therefore “not ready for independent examination”. |
| Cllr Alan Macro | Paragraph 4.6: AWE Detailed Emergency Planning Zones (DEPZs) are not specifically mentioned – should be re-worded to include DEPZs Paragraph 4.7 The justification for merging the Eastern and Kennet Valley Spatial Areas is no longer valid. The strict constraint on the building of new homes imposed by the introduction of the DEPZs around the two AWEs means that the merging no longer provides flexibility |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|---|
| Southern Planning Practice for the Saunders family | It is noted that paragraph 4.5 sets out that the Local Housing Need (LHN) for West Berkshire is 513 dwellings per annum, using a 2022 base date. This figure has not changed since the Regulation 18 consultation document which is hard to believe given two years has passed and the current housing crisis is worsening. This figure should be tested in the Local Plan Examination and due regard should be given to the standard method as well as the duty to cooperate. |
| Thakenham Homes | Paragraph 4.5 (Key Pieces of Evidence) – It should be emphasised that Thakeham is concerned with the HELAA stated as being a key piece of evidence in preparation of the Plan, as we consider sites have been assessed on out-of-date information, and while it is appreciated that the HELAA report was updated in January 2023, individual site information does not seem to have been consistently updated. Thakeham supports the creation of the Reg 19 Local Plan and looks forward to engaging further. Currently however we have concerns in relation to the wording of the policies, their evidence base and therefore on the overall soundness of the Reg 19 Local Plan as drafted. Whilst the Council’s evidence underpinning certain policies is strong, in others it is notably weak. |

Summary of issues raised:

- Policies should be reviewed in the context of the Vision required by NPPF para 22
- The justification for merging the Eastern and Kennet Valley Spatial Areas is no longer valid due to the DEPZ
- The LHN should be tested at the examination
- HELAA site information not consistently updated

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR: The Spatial Areas**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------------|---|
| Compton Parish Council | Plans which are complex and cross representational boundaries are inherently difficult to deliver and therefore ineffective. Suggested amendment (para 4.17): Hungerford, Lambourn, and Hermitage have designated neighbourhood areas for the preparation of neighbourhood plans, Compton has a designated neighbourhood area for its adopted neighbourhood plan, and the rural service centre of Pangbourne, has limited development opportunities. |
| Holybrook Parish Council | Holybrook has strongly objected to being lumped into one zone with all parishes which are not part of the AONB or Thatcham and Newbury and this has not been addressed. Combining these, two very distinct in character areas, will create an overly diverse area with a mixture of urban and rural neighbourhoods. The only common factor is that they are not in the ANOB or in Newbury/Thatcham. The Council is concerned that less attention will be paid by planners to the circumstances/constraints of the urban parishes of the Eastern Urban area and this shows a broad-brush approach with more consideration shown for the ANOB and Newbury/Thatcham. |

General Consultation Bodies: None**Other Stakeholders:** None**Landowners, site promoters and developers:**

| Consultee | Main issues |
|---|--|
| Solve Planning for Harry West Investments | We support the Council's statement that Newbury and the other urban areas will continue to be the main focus for housing and economic development in the District. |

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| Thakenham Homes | <p>Paragraph 4.15-4.16 (Lambourn’s Role in the AONB) – Thakeham supports the Council’s identification of Lambourn as a key service centre for surrounding rural area, as well as identifying its leading role within the horseracing industry across the country. It is therefore considered that growth to this village is sustainable, to ensure the village continues to thrive and also provide homes to support the specific local need of those within the horseracing industry.</p> <p>Paragraph 4.17 (Existing Allocations in the AONB) – Thakeham is concerned that, despite being allocated in an adopted Plan in 2017, a number of the allocations in the AONB have not been delivered.</p> <p>The Council’s latest Annual Monitoring Report (January 2023) confirmed that as of 31/03/22 1,539 dwellings had been permitted on the HSA DPD sites, however, completions totalled only 388 dwellings. With 3 years remaining in the Plan Period, it is unlikely that the delivery of the HSA DPD sites will accord with expectations. Thakeham is not aware that the achievability and deliverability of these sites has been reassessed, however the Council proposes the sites to be ‘carried forward’ into the Local Plan Update. This would effectively grant an allocation on these sites for a total period of 22 years (2017-2039), when there is evidence that suggests these sites might not be deliverable. Thakeham does not consider this to be a sound approach to allocating land for development.</p> <p>Paragraph 4.17 also emphasises the role of neighbourhood planning, stating that: “<i>additional development for the period beyond 2026 will therefore be limited and will come in part through allocations within the NDPs.</i>” Whilst Thakeham is wholly supportive of neighbourhood plans and their ability to drive community-led growth, it is also our understanding that they can be slow to come forward. Therefore, in Settlements within the AONB, where existing allocations are proving slow to deliver, Thakeham would advocate the Reg 19 Local Plan considering additional supporting sites to ensure growth is not stunted by undeliverable allocations.</p> |
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Summary of issues raised:

- Some support for the approach but continued concern from Holybrook Parish Council about the Eastern Spatial Area
- Some minor amendments proposed
- A comment about the deliverability of both NDPs and the sites carried forward from the HSADPD

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP1 Spatial Strategy

Number of representations received: 53

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|------------------------------------|--|
| Burghfield Parish Council | Combining the Eastern Area which is urban and East Kennet Valley which is rural seems to signify an unwillingness to develop policies relevant to each area and instead just focus on further development without due process being applied. |
| Holybrook Parish Council | <p>Holybrook strongly objects to being lumped into one zone with all parishes which are not part of the ANOB or Thatcham and Newbury.</p> <p>The proposed 'expected' minimum density based on the net space is too high for Holybrook and, for suburban areas, may not be the most effective way of calculating the required densities. This is of great concern, especially for development close to and feeding into the A4 Bath Road not only from Junction 12 of the M4 but also from Tilehurst and Burghfield. The Local Plan does not consider the other options for the calculation of density which include habitable rooms, quantity of floor area or gross area. This policy shows a broad-brush approach which fails to fully appreciate the requirements of each area and their infrastructure constraints. The Parish Council proposed that no minimum density be applied and, instead, each application is considered on its own merit.</p> <p>The Local Plan encourages more development in an area where traffic levels are dangerously close to saturation and infrastructure simply has not kept pace.</p> |
| Speen Parish Council | Support statement in final paragraph under 'Newbury and Thatcham.' 'The villages in the surrounding area...' |
| Stratfield Mortimer Parish Council | The strategy is sound but many aspects indicate that they will be supported or encouraged by West Berkshire Council, but no indication is given of how they will be funded. |
| Thatcham Town Council | Not legally compliant in regard to SA/SEA as, when considering strategic site, 'reasonable alternatives' that are not around Thatcham were not considered. The evidence of the failure of the Sandford Strategic Site Allocation to deliver the expected number of houses suggests that relying on two strategic sites (with a number of smaller sites) is not even the best approach. |

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| Tilehurst Parish Council & Tilehurst NDP Group | Removal of expectation of housing allocations through Neighbourhood Development Plans is welcome. |
| Theale Parish Council | <p>It is not acceptable to accommodate growth of 25% into such a small area of the district. This will place additional demand on already stretched infrastructure, additional traffic and air pollution.</p> <p>The recently approved housing in Theale is very high. Approved planning applications need to be included within the plan.</p> <p>The plan will compromise local medical provision including GPs, hospitals and surgery facilities. This should be addressed in the plan.</p> <p>The plan will introduce increased traffic, pollution and does not include much needed public transport, particularly to rural villages. Solutions should be considered.</p> <p>Desk based assessments are not appropriate and surveys should be carried out.</p> |
| Defence Infrastructure Organisation for the Ministry of Defence | <p>The area covered by any West Berkshire Local Plan will both contain and be washed over by statutory safeguarding zones that are designated to preserve the operation and capability of defence assets and sites including RAF Benson, RAF Odiham, RAF Welford, Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield and the Central Wide Area Multilateration (WAM) Network.</p> <p>On reviewing the potential allocation site and policies for the area, I can confirm the MOD has no statutory safeguarding concerns or suggested amendments to the West Berkshire Local Plan Review. (For clarity, this response relates to MOD safeguarding concerns only and should be read in conjunction with any other submissions that might be provided by other parts of the MOD)</p> |
| Historic England | The sentence ‘the District’s historic environment...’ could be interpreted narrowly to only include historic environment and environmental assets rather than including heritage and natural assets. If this is the intention then a wording change is needed. |
| Thames Water | Stress importance of early engagement between developers, Council and Thames Water to understand upgrades required. Thames Water have supplied table with site specific comments from desktop assessments on water supply, sewerage/waste water network and waste water treatment infrastructure (see representation) |
| Environment Agency | Details about how sensitive areas (River Kennet SSSI, River Lambourn SSSI & SAC) will be protected and safeguarded from development pressures or completing development should be highlighted. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------|---|
| Network Rail | This policy should be consistent with NPPF requirements with regard to supporting/promoting sustainable transport. Concerns that opportunities to support sustainable transport and specifically encourage modal shift have been missed. Therefore inconsistent with NPPF 152- 154. |

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| Lambourn Trainers Association | The Council's support for the retention and growth of the HRI in Lambourn should be identified as part of the Plan's spatial strategy (North Wessex Downs AONB) and should be included on the policies map. There is no strategic link to Policy DM37 which specifically addresses the equestrian and horseracing industry. |
|-------------------------------|--|

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | SP1 states that outside of settlement boundaries, land will be treated as open countryside, which is contrary to the NPPF, as this does not mention settlement boundaries. The statement relating to development on the edge of defined settlements seems to contradict no development outside a settlement boundary in policy DM1. Reference to windfall development on windfall sites within settlement boundaries again precludes any development outside a settlement boundary, even though this is not precluded in the NPPF. Cannot tell how much of the additional growth e.g. additional households, employment (office/industrial) land will be in Newbury specifically, rather than just the Newbury/Thatcham spatial area. Not legally compliant in regard to SA/SEA - not evaluated 'reasonable alternatives' as no alternatives to approach of mix of strategic and smaller sites. |
| DPDS for Newbury Community Football Club | Proposed wording regarding opportunities for intensification of employment use and business development for if a site specific policy or allocation is adopted for the London Road Industrial Estate. |
| Liberal Democrat Group | The sections on "Context" (2.1) and the "Development Strategy: Overview" (4.6) need to make more of the very large constraints on all spatial development in West Berkshire. With the recent statement by DLUHC that this could be taken into account when deciding the number of new homes to provide, it should be explicitly stated whether or not the Council wishes to use this to argue for a lower number. The policy doesn't take sufficient advantage of broadband reducing the need to travel. This can help sustain viable rural communities through improved access to services via remote means. The spatial strategy does not make sufficient use of brownfield land. Suggested wording supplied. |
| Cllr Alan Macro | The justification for merging of Eastern and Kennet Valley Spatial Areas is no longer valid. The strict constraint on the building of new homes imposed by the introduction of the DEPZs around the two AWEs means that the merging no longer provides flexibility. Object to statement that "... higher densities achievable in the centres of Hungerford, Pangbourne and Theale". Pangbourne and Theale are villages and dwelling density should reflect their village character. |

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| | <p>The West Berkshire Strategic Transport Model and the Air Quality Assessment have not been updated for the proposed increase in number of units on the NE Thatcham strategic site from 1,250 to 1,500 in the plan period, nor the sites proposed for Theale (RSA10 and RSA11)</p> <p>Disagree that “Theale will be a focus for additional housing through existing commitments and new allocations”.</p> <p>The Lakeside site has outline planning permission for up to 325 units, nine of which have full permission. An adjacent site, allocated in the HAS DPD, has outline permission for 104 houses.</p> <p>These homes will fully utilise services and infrastructure in Theale, particularly health services .</p> <p>Theale will still need that “period of consolidation”, recognised in Section 4.35 of the Core Strategy, once construction at Lakeside has been completed.</p> |
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Landowners, site promoters and developers:

| Consultee | Main issues |
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| Southern Planning Practice for Saunders Family | Highly likely the strategic allocation will not deliver the number of homes intended, therefore the Council should be looking to allocate more sites for residential development to address the shortfall. |
| Lichfields for a Partnership comprising A2Dominion, Catesby Estates, Donnington New Homes & Ptarmigan Land | Support Policy SP1’s vision and objectives, the Spatial Strategy’s development approach based on three spatial areas, the recognition that density on individual sites will vary according to their location and site characteristics and the intention that Thatcham will be a focus for regeneration. NET has been identified as the most appropriate site to deliver the strategic growth which Thatcham needs and is the only site which has been identified as suitable for delivering this through the LPR and its background evidence. In particular the Vision 2050 for West Berkshire clearly supports the idea of north of Thatcham as being the only direction of growth for the settlement in the long term. |
| Neame Sutton Ltd for Donington New Homes | Strategy fails to take advantage of opportunity presented by Rural Service Centres, such as Hungerford, to deliver sites early in plan period by directing further housing to such locations. |
| Bluestone Planning for Mr & Mrs T Gallagher | Spatial strategy strongly supported. |
| Solve Planning for Harry West Investments Ltd. | Support the statement that Newbury and the other urban areas will continue to be the main focus for housing and economic development. |
| ET Planning for Messers. Marriage | Supportive of identification of three spatial areas, including Newbury and Thatcham as one of these. |

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| Nexus Planning for Pangbourne Beaver Properties Ltd | Support, in general terms, the spatial strategy set out in Policy SP1. Support the spatial approach to the North Wessex Downs AONB itself as referenced in Policy SP1. However, Policy SP15 disregards not only the spatial strategy in Policy SP1 but also the settlement hierarchy in Policy SP3, failing to make any development allocations at Pangbourne (a 'Rural Service Centre' which also benefits from a railway station), whilst making a series of allocations at settlements in this spatial area that are demonstrably less sustainable / lower down the Council's own settlement hierarchy. Proposed that should be a review of the approach to the allocation of sites in the North Wessex AONB area |
| Boyer Planning for Sovereign Housing Associaion | Sovereign supports the Council's proposed spatial strategy to the extent that development is clearly and appropriately directed toward the most sustainable locations within the district. |
| Firstplan Ltd for Englefield Estate | Representation re Rail-Road Transfer Site at Theale. Failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes - support for growth of the Rail-Road Transfer Site at Theale is sought Suggested amendment to include in policy that <u>Opportunities to increase and expand provision of the movement of freight by sustainable means will be supported</u> |
| Turley Associates for Pangbourne College | Plan fails to consider whether Pangbourne, as a rural service centre can accommodate development outside of the existing settlement, in particular to contribute to meeting the needs of specialised housing (DM19). |
| PSP Consulting for Beftonforth Ltd. | Policy should be extended to include opportunities to increase provision for the movement of freight by sustainable means. Proposed changes to policy supplied. |
| Carter Planning Limited for Mr R L A Jones | Objection is raised to the mechanisms for the allocation of housing in Lambourn. It is very unlikely that the statement in Paragraph 1.17 can be achieved namely that Neighbourhood Plans can promote more housing (but not less). The Council should allocate all housing sites through this Draft LPR and not leave the task to Neighbourhood Plans. Similarly there should not be any prohibition on sites adjoining the settlement boundary to allow for development contemplated by the NPPF. These sites will especially be required if proposed housing sites do not come forward. |
| Savills UK for the Englefield Estate | Given constraints in District, particularly important that an appropriate amount of development is allowed for at sustainable locations in the Eastern Area in particular (e.g. Burghfield Common, Mortimer and Theale) to ensure that housing needs are met and that the vitality of settlements is maintained. Whilst the Eastern Area has constraints (e.g. DEPZ, flood risk etc.), these are subject to change and are dependent on the scale and type of development proposed, and are therefore not necessarily insurmountable constraints over the entirety of the Plan period. An Inspector recently allowed a residential development of 49 units within the DEPZ at Three Mile Cross. Considered that a more positive and proactive approach should be taken in line with NPPF paragraph 121. The provision for 175 units at Tilehurst (proposed in Reg.18 consultation) has not been redistributed elsewhere in the Eastern Area - greater provision should be made for additional housing at these settlements in the Eastern Area to respond to changes in circumstance e.g. amendments to the DEPZ boundary. |

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| | <p>Paragraph 6.38 (<i>should be 6.36</i>), supporting Policy SP14, states that no additional dwellings are proposed based on incorrect reference to Mortimer being a ‘Service Village’ rather than a ‘Rural Service Centre’. Given the sustainable and relatively unconstrained location, the LPR spatial strategy should therefore make additional provision for development at Mortimer.</p> <p>It is considered that reference to importance of business development should be broadened to not only refer to DEAs but also existing employment areas and the rural economy – suggested changes supplied.</p> |
| Pro Vision for Mr and Mrs Pittard | Para 69 of NPPF encourages local planning authorities to promote the development of a good mix of sites. The importance of small and medium sized sites should therefore not be underestimated and indeed in line with the framework, at least 10% of the housing requirement should come from small sites. |
| Boyer for Darcliffe Homes | Despite the constraints in these two Spatial Areas, 92% of the residential allocations within the emerging local plan are located in the Newbury and Thatcham and Eastern Area Spatial Areas. The Council have missed opportunities to allocate residential development at appropriate and sustainably located sites. Although the Council has given great weight to conserving and enhancing the landscape and scenic beauty of the AONB, there is a clear and overriding need to accommodate a modest amount of growth within the Spatial Area if sustainable development is to be achieved. |
| Thakeham Homes | Thakeham supports the Council's identification of Lambourn as a key service centre for surrounding rural area, as well as identifying its leading role within the horseracing industry across the country. |
| Barton Willmore, now Stantec for Yattendon Estate | <p>We support Policy S1 criteria b), which confirms that the Council's strategy for the plan period optimises the use of previously developed land.</p> <p>SP1 encourages proposals to strengthen and diversify the rural economy, particularly where they are located in or adjacent to Rural Service Centres and Service Villages identified in the settlement hierarchy. We consider that this is too prescriptive and goes against the aspirations of Section of the NPPF, which seeks to support a prosperous rural economy. Paras. 84 and 85 of NPPF recognise that businesses in rural areas should be supported including those ‘beyond existing settlements’.</p> <p>Suggested amendment supplied.</p> |
| Bell Cornwell LLP for Hathor Property Limited | <p>Generally supportive of statement in this policy, of the aim to direct development to land of lower environmental value and previously developed land; and the support for appropriate densities to make efficient use of land. It is not clear, however, that the selected allocations are the best means of achieving this strategy, given the heavy reliance on large strategic developments on greenfield sites to meet housing need</p> <p>Policy SP1 does not give adequate recognition of the requirement to plan for rural villages meeting their own needs. There is support expressed for the rural economy, but not for any rural housing. This is contrary to paragraph 79 of the NPPF, which requires that planning policies identify opportunities for villages to grow and thrive, especially where this will support local services.</p> |
| Turley for Hathor Property | The principle of approach is supported, given it provides the greatest opportunities of delivering sustainable development. |

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| | <p>SA/SEA considers the merits of different strategic options for delivering the necessary growth to meet development needs but little evidence to justify why the particular options have been selected. Whilst it is recognised that strategic growth in Thatcham does offer the potential to secure related infrastructure, facilities and services alongside residential development, a suitable balance does need to be made with the greater level of existing facilities and services, and opportunities to use alternatives to the private car, that exist within and around Newbury. An alternative option that explored a focus on both Newbury and Thatcham, with reduced growth in the AONB villages and Eastern Area, may well have been more appropriate. In order to secure a more balanced approach to delivering sustainable development, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p> |
| Turley for Donnington New Homes | <p>Support this policy as it identifies Newbury as a focus for housing development.</p> <p>Concerns with SA/SEA. It states the continued focus on Newbury is not being taken forward with reasoning that unknown <i>impact as to whether the strategy would be able deliver adequate housing to meet the local identified need due to the lack of suitable sites within the area.</i></p> <p>It is apparent from the SA that there are available sites which could add to supply and restrict the need to allocate sites in more sensitive and less sustainable areas. The plan consequently fails to reflect its evidence base and the SA/SEA outcomes. Council has failed to identify sufficient allocations at Newbury, contrary to its own spatial strategy and SA/SEA.</p> <p>Failure of the Council to have considered ‘reasonable alternatives’ in terms of other sites located at the highest tier settlement, instead of AONB and other less sustainable sites is a fatal failure of the SA/SEA. It is difficult to understand how the Council assessed reasonable alternatives from the beginning of the plan making process and considered that the proposed strategy was the most appropriate.</p> <p>The draft Plan proposes sites in the AONB, and the eastern area which does not accord with the Council’s spatial strategy.</p> |
| Opus Works for: <ul style="list-style-type: none"> • Bewley Homes & Calcot Park Golf Club • Chartfield Homes and Newbury and Crookham Golf Club | <p>Policy SP1 – Spatial Strategy is supported.</p> |
| White Peak Planning Ltd for Bloor Homes | <p>Not consistent with national policy, justified or effective. There needs to flexibility for density to be varied across a development site, particularly where it will be delivered in phases, to reflect site constraints.</p> |
| TOWN for landowners of Land East of Pincents Lane | <p>The role of Reading as the key economic driver and centre of population in the sub-region and HMA is underplayed. There is a both a need and a sustainable opportunity to identify more sites for development in the Eastern Area which would recognise the ‘close functional relationship’ with Reading. Object to the removal of new allocations for housing development in this area and particularly at Tilehurst HELAA -TIL 13.</p> |

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| Pro Vision for T A Fisher & Sons Ltd | <p>Representation re Land at West End Road, Mortimer (HELAA ref. SM2)</p> <p>Mortimer was considered a sustainable location for growth, as demonstrated by the allocation of 110 dwellings to the village. The case for focusing new development in this location is even stronger now, given the level and range of existing facilities, services and infrastructure in the area, as well as those currently coming forward.</p> <p>Mortimer is not subject to the constraints mentioned in paragraph 4.16 and 4.33. The Council has overlooked the additional potential at Stratfield Mortimer, while allocating new housing to other Rural Service Centres, alongside Service Villages.</p> |
| Pro Vision for T A Fisher & Sons Ltd | <p>Representation re. Land 'Land to the rear of The Hollies, Burghfield Common' (HSA16 of the HSA DPD).</p> <p>We agree with this strategy in the context of the continued allocation of land to the rear of The Hollies. Identification of Burghfield as a rural service centre appears to be at odds with the Council's position in respect of The Hollies as it does not rule out further development in Burghfield Common, despite the approach taken within Policy SP4 which sets out that proposals for development within the DEPZ are likely to be refused.</p> <p>LPR does not therefore support the vitality of the rural community of Burghfield Common since it fails to identify further opportunities for the village to grow and thrive.</p> <p>The Council has not properly reviewed or justified its approach towards development within the DEPZ of the AWE sites, particularly in relation to the provision of housing around AWE Burghfield and that there is confusion over the spatial strategy in relation to development within Burghfield Common.</p> |
| Carter Jonas for the Trustees of the Frank Wallis Estate | <p>Support the Council's spatial strategy and agree that the focus of development should be at the sustainable top tier Urban Areas of Newbury and Thatcham.</p> <p>Over-reliance on two large strategic sites, which will require at least the 17-year plan period and beyond to be delivered. Trajectory suggests that additional sites need to be found to ensure that there is housing delivery in the early phases of the plan.</p> <p>Considered that there should be flexibility in relation to development outside but adjacent to settlement boundaries in sustainable locations at Urban Areas and that development in these locations should not be restricted and treated as open countryside.</p> <p>Residential allocations conflict with the policy in relation to "<i>optimising the density of development to make the best use of land</i>". Whilst landscape impact is an important consideration for the design and density of a scheme, policy wording recommending low density development on proposed allocations at Theale and Chieveley (Policies RSA10, RSA11 and RSA17) are considered contrary to draft Policy SP1 as the density and ultimate capacity of a site should be determined during the course of planning application preparation and determination.</p> |
| LRM Planning Limited for Hallam Land Management Limited | <p>Consider that insufficient regard has been had to the role of the Eastern Area and its ability to accommodate new housing. The suitability of other settlements, particularly Mortimer, is overlooked.</p> <p>The Housing Background Paper reveals that housing completions from The Street are expected to be achieved by 2026. Therefore for the remaining 13 years of the plan period, there would be no new planned housing at Mortimer despite its role and status in the Local Plan.</p> |

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| Lochailort Newbury Ltd | Support the “town centre first” strategy and the sequential approach within it. We support a minimum density approach, however note that the potential for higher densities should be acknowledged, as set out at paragraph 25 of the NPPF, and request that the policy wording is amended. Wording supplied. |
| Pro Vision for Feltham Properties | Inconsistency in relation to density of development at edge of settlement locations – the stated ranges are not consistent with the West Berkshire pattern book (2019). Policy should clarify that higher densities can be appropriate on the edge of defined settlements, especially for higher tier settlements and along main transport corridors/nodes. |
| Plainview Planning for Liebreich Associates | The spatial strategy is flawed, there are inconsistencies and the plan doesn’t conform to the NPPF. Plan is not legally compliant as insufficient regard has been had to climate change, sustainability or delivering environmental enhancements. Conflict with Spatial Strategy and DM1. |
| Iver Consulting Ltd. for Atul Hindocha (Prosper Infinity Ltd.) | Priority should be given to brownfield sites before the release of greenfield sites e.g. Newbury Leisure Park |
| Knight Frank for Limes Leisure Investments | Support the spatial strategy which optimises the use of previously developed land. |
| Nexus Planning Ltd. for Croudace Homes | Support decision to direct growth towards Thatcham. Support for Thatcham’s status as a ‘top tier’ settlement. However, additional levels of growth could be directed to Thatcham, or alternatively allow development adjacent to the settlement boundary, subject to criteria, to assist allocation at Henwick Park. |

Summary of issues raised:

There is significant support expressed for the Spatial Strategy.

The main issues raised related to:

- Whether the SA/SEA had evaluated reasonable alternatives. Queries related to the over-reliance on strategic sites, evaluation of reasonable alternatives around Thatcham and whether there was enough recognition of the opportunities for growth of rural villages.
- The AONB: Failure to make allocations at Pangbourne yet allocations at less sustainable settlements not consistent with Policies SP1 and SP3. Liberal Democrat Group feel should be more focus on viable rural communities.
- Newbury and Thatcham Area: Though Newbury is focus for housing development, failure to identify sufficient allocations at Newbury
- Eastern Area: Argument that appropriate amount of development should be allowed for at sustainable locations in Eastern Area. Role of Reading is underplayed. Issue of Burghfield Common as a rural service centre conflicting with restricted approach to development in DEPZ. Potential for development at Stratfield Mortimer had been overlooked.

- Densities: Some objection to the densities suggested in the centres of the rural service centres and in Holybrook Parish.
- Evidence base: Questions regarding whether evidence base is sufficiently up to date.
- Role of NDPs: Some scepticism as to whether allocations would be forthcoming.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: SP2 North Wessex Downs AONB**

Number of representations received: 19

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
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| Chieveley Parish Council | Broadly supports policies supporting the conservation and enhancement of the AONB. Plan must continue to conserve and enhance the AONB in accordance with national policies. Presumption in supporting text 4.28 viii. is not consistent with NPPF 177 – suggested wording supplied. |
| Hermitage Parish Council | Particularly support preserving dark night skies but suggest it also apply to villages in the AONB (with due consideration for safety) as light spill can affect the neighbouring countryside. |
| Theale Parish Council | Areas in the AONB need to be considered for housing to spread the impact. The current restrictions exclude far too much of the district. |
| Tilehurst Parish Council | Welcome recognition of the AONB and abundant biodiversity in settlements and the countryside. |
| Historic England | Supports the policy. |

General Consultation Bodies:

| Consultee | Main issues |
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| North Wessex Downs AONB | Support |

Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | The success of AONB farmers and landowners is essential to secure the income by which the AONB can be sustained. Farmers need to be enabled and encouraged to produce more food for the local towns in order to contribute towards more sustainable and robust local economies. The AONB is not a natural area – flora and fauna constrained by farming and forestry. |

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| | <p>No specific policy for rural economy, horticulture, forestry and agriculture. There are no DM policies under chapter 12. Reliance on a planning officer to define settlement boundaries can stifle organic growth.</p> <p>Houses are becoming unaffordable; the affluent are not users of bus services so sustainable bus network in the AONB is unlikely.</p> <p>Streetlights compromise dark skies and drive away bats. Security lighting is left on all night under the guise of safety. Pavements are needed for safe active travel.</p> <p>Terminology of countryside vs. rural vs. AONB is not clear between the policies.</p> |
| Cllr Alan Macro | <p>The statement “planning permission will be refused for major development in the AONB except in exceptional circumstances, and where it can be demonstrated to be in the public interest” is too restrictive.</p> <p>Major developments SHOULD be allowed in the AONB where they do not have a significantly adverse effect on landscape character.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Fisher German LLP for Mr Musgrave and Mr Begley | A number of settlements should be allowed to grow - failure to deliver new houses will increase house prices and force younger people to move out of area. Council's evidence shows high affordable housing need within AONB. |
| Nexus Planning Ltd, for Pangbourne Beaver Properties Ltd | Support the spatial objective to deliver appropriate and sustainable growth in the North Wessex Downs Area of Outstanding Natural Beauty but the Local Plan fails to deliver, making no development allocations at Pangbourne (a 'Rural Service Centre' which also benefits from a railway station), whilst making a series of allocations at settlements that are demonstrably less sustainable / lower down the Council's own settlement hierarchy. The approach to housing provision in the North Wessex AONB spatial area is unjustified, inappropriate and unsound, and conflicts with the strategy for the district as set out in Policies SP1, SP2 and SP3. It should be fundamentally reviewed and specifically, Site PAN8 at Pangbourne should be allocated as part of this strategy |
| Boyer for <ul style="list-style-type: none"> • Sovereign • Darcliffe Homes | Support draft Policy SP2. However, recommended that the draft policy should explicitly set out that the principle of development is considered to be acceptable for the sites that are allocated within the North Wessex Downs AONB Spatial Area. This would avoid the subsequent need for each individual planning application to demonstrate that there are exceptional circumstances to make the development acceptable. Suggests additional criteria to include in policy. |
| Barton Willmore, now Stantec for <ul style="list-style-type: none"> • The Sulham Estate • Yattendon Estate | Policy SP2 represents an unnecessary duplication of paragraphs 176-177 of the National Planning Policy Framework (NPPF). Consider that the policy should be revised to remove duplication and refer to the relevant sections of the national policy instead. Major Development: LPR seeks to incorporate a prescriptive approach which contradicts the deliberate flexibility afforded by Footnote 60 of NPPF. We also raise particular objection to the wording of items i), ii) and iv) under para 4.29 (<i>should read 4.27</i>). |

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| <ul style="list-style-type: none"> Donnington Valley Group Ltd. | <p>Reference to the DMPO is erroneous and conflates two entirely separate definitions of ‘major’.</p> <p>There is no reference in national policy to assessments of development within the AONB being undertaken considering an ‘in combination’ impact.</p> <p>Supplies legal judgement which concludes that ‘major development is a matter of planning judgment to be decided by the decision maker in light of all the circumstances of the application and the context of the application site. Recommend that para 4.29 (4.27) is deleted</p> <p>Query whether points vi) to xii) under para 4.30 (<i>should be 4.28</i>) are an unnecessary duplication of national policy.</p> |
| Savills UK for the Englefield Estate | A greater allowance should be made for new development in sustainable areas in the east of the AONB close to the Eastern Area, including at Englefield and Bradfield Southend. |
| Thakeham Homes | <p>Unlikely that the delivery of the HSA DPD sites will accord with expectations. HSA 6 and specifically HSA 19 which is located in Lambourn, have not advanced a planning application and not aware that the achievability and deliverability of these sites has been reassessed. However the sites are ‘carried forward’ into the LPR. In settlements within the AONB, where existing allocations are proving slow to deliver, would advocate considering additional supporting sites to ensure growth is not stunted by undeliverable allocations.</p> <p>According to the statistics provided within Live Tables by the Department for Levelling up, Housing and Communities, as of 1 April 2021, West Berkshire had a total housing stock of 69,438 units. The 9,146 planned for across the plan period represents a 13% increase across West Berkshire as a whole. Comparably, it would therefore appear inconsistent that a Rural Service Centre such as Lambourn should only be given provision for a 3% increase in its housing stock.</p> |

Summary of issues raised:

General support for policy from parish councils, North Wessex AONB and Historic England

Some representations, particularly from site promoters argued that more housing should be allocated in the AONB, to spread the impact of additional housing and to help meet affordable need. Some questioned whether proposed allocations accorded with settlement hierarchy with some rural service centres receiving no additional allocations and whether a greater allowance for new development should be made in the east of the AONB close to the Eastern Area.

The objection was made to duplication with the NPPF and conflict with national policy over consideration of ‘major development’.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP3 Settlement Hierarchy

Number of representations received: 35

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
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| Theale Parish Council | <p>Object to further development in Theale as it is not proportionate to the settlement. Woolhampton and Cold Ash are included as services villages, but are not. Theale is not a rural service centre as it does not have key services and does not meet the criteria – it should be a service village.</p> <p>The Plan should state the impact development would have on utilities, services and villages. Theale doesn't have the capacity for further development.</p> <p>Object to the sentence: 'These smaller rural settlements may offer some limited and small-scale development potential, appropriate to the character and function of the village, in order to meet local needs through...'</p> <p>4.33 – Theale doesn't meet the criteria for a service village, as there is insufficient infrastructure, services and public transport.</p> <p>4.34 – Local services are already oversubscribed in Theale, which has limited facilities, and cannot cope with additional demand.</p> |
| Aldermaston Parish Council | <p>Pleased to see that Aldermaston is no longer classified as a service village due to its reduction in key services over the last 10 years.</p> |
| Holybrook Parish Council | <p>The Parish of Holybrook is not mentioned specifically in this policy. Does that mean it is not included in SP3 or is it grouped with Calcot? Services in the Eastern Area, have not kept pace with development and are under immense pressure. The Local Plan has ideological theory stating that any development should be supported by infrastructure and service (SP24 p83) and yet does not seem to address the current deficiencies and certainly not potential future deficiency</p> |
| Chieveley Parish Council | <p>Broadly support the settlement hierarchy and the need for some development in villages such as Chieveley where this is acceptable in terms of visual impact in the AONB.</p> |

General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
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| Various individuals/ local residents | The settlement hierarchy has made rural areas constrained and only likely that the affluent will live here. Little supply and no plans for affordable or social housing. |
| Campaign to Protect Rural England | Larger sites for housing could be better located near motorway junctions. |
| Cllr Alan Macro | <p>Some of the settlements have constraints meaning it is not appropriate for them to have non-strategic housing land allocations:</p> <ul style="list-style-type: none"> • Burghfield Common and Mortimer are within the Burghfield AWE DEPZ • Theale has outstanding planning permission for 429 dwellings. Any further housing allocations would change the character of the village and over-burden local services, particularly health services. <p>The imposition of the DEPZs around AWE sites mean that housing site allocations can no longer be made at Burghfield Common and Mortimer. This means that other RSCs and Service villages are being asked to take more housing thus stretching their infrastructure and services. Modest-sized housing allocations should be made at larger villages (other than RSCs) that have services such as convenience stores, pubs, primary schools, churches, village halls and/or public transport. Such allocations would increase the viability of the services and help such villages become more sustainable.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Southern Planning Practice for Saunders Family | <p>Support approach to new development.</p> <p>In addition to focusing growth in urban areas, the Council should look to a range of settlements which can accommodate growth.</p> <p>Land East of Stoney Lane would provide a noteworthy population which would provide additional footfall and a valuable contribution to Newbury's facilities and services.</p> |
| Fisher German LLP for Mr Musgrave and Mr Begley | Support for Chievely as Service Village. Need sufficient land allocated to deliver housing needs, to contribute to infrastructure and affordable housing –site promoted. |

| Consultee | Main issues |
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| Rectory Homes | Consider more successful approach to secure delivery of affordable homes within rural service centres and service villages is through provision of market-led housing schemes. Suggest further criterion to permit suitable sites on edge of settlements outside settlement boundary which accord with settlement pattern and have limited adverse impacts on character and appearance of area. For clarity 'infill' should be defined in policy. |
| Bluestone Planning for Mr & Mrs T Gallagher | The approach in this policy is not reflective of the approach to development in relation to settlements in the NPPF. |
| Pro Vision for The Trustees of the Allan Snook Will Trust | The Council's approach to 'smaller villages' with a defined settlement boundary seeks to severely restrict any housing growth, such as at Boxford. The Council's approach is flawed and will have serious implications for rural communities, contrary to the aims of national policy. Considered that these villages could help the Council meet any identified housing shortfall. Alternatively, the Plan could require 'small villages' with a defined settlement boundary to prepare Neighbourhood Plans to allocate sites to deliver reasonable scale growth to enhance their vitality and viability and help deliver the aspirations of the community. |
| Nexus Planning for Pangbourne Beaver Properties Ltd | Despite the very clear requirements of both Policies SP1 and SP3 for the focus of development in the district to follow the identified settlement hierarchy, and the requirement of Policy SP2 to ensure appropriate and sustainable growth in the North Wessex Downs AONB area, the Local Plan fails to do so. Policy SP15 makes no development allocations at Pangbourne, despite its inherent sustainability and the availability of a suitable site (Site PAN8). This approach results, wholly unnecessarily, in an unsustainable pattern of development which does not have regard to the needs of Pangbourne. Approach should be reviewed, ensuring that an allocation is made at Pangbourne (Site PAN8) - as the most sustainable location for development in this spatial area. |
| Pegasus Group for Donnington New Homes | The principle of Newbury continuing to be a ' <i>prime focus for new development</i> ' is supported. Sandleford Park West is of a scale that has the ability to sustain existing, and support new services and facilities in and around Newbury. |
| Woolf Bond Planning for Ms S McElhinney | Land east of Little Lane, Upper Bucklebury should be included in the defined settlement boundary of the village when considered against the Council's criteria for definition. The retention of the land in the settlement boundary would also reflect approach for similar areas of open space in settlements like Burghfield Common and Chieveley. The approach has not sought to apply its methodology consistently and therefore it is not justified. Object to the reclassification of the village of Upper Bucklebury so that it is outside of the hierarchy. Advocated that to address the soundness concerns, the following amendments to the policy are made:. 1. That Upper Bucklebury is included as a "Service Village" within the policy 2. That the other settlements currently not listed in policy SP3 but where settlement boundaries are defined are listed as a four tier – "other village". That the policy confirms that infilling and other similar developments together with rural exception housing is appropriate. 3. That the settlement boundary of Upper Bucklebury is revised to both retain the existing open space east of Little Lane and include the dwellings of Byles Green. |

| Consultee | Main issues |
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| ET Planning for Messers. Marriage | Supportive of the settlement hierarchy and identification of Thatcham as an urban area. |
| Carter Planning for Mr R L A Jones | We welcome the re-incorporation of Lambourn as a “Rural Service Centre”. Indeed Lambourn can fulfil Strategic Objective 2 to provide a range of housing and sites for housing. |
| Savills UK for the Englefield Estate | <p>Categorisation is justified and is supported.</p> <p>Parts h to j of Policy SP3: not clear why the provision for ‘other minor development’ and reference to First Homes exception sites have been omitted – suggested amendment supplied.</p> <p>Settlement Hierarchy Review Topic Paper (November 2020) has not been updated - any subsequent changes to settlements’ or representations to previous Local Plan consultations, have not been fully considered.</p> <p>Theale, Burghfield Common and Mortimer all identified as ‘Rural Service Centres’ within the Eastern Area. Policy SP1 states only that Theale will be a focus for development in the Eastern Area and includes no reference to the development potential of Burghfield Common and Mortimer.</p> <p>Considered appropriate for a settlement boundary to be identified at Englefield to facilitate sustainable development.</p> <p>Settlement Boundary Review Background Paper contains no specific assessment of Englefield.</p> |
| Gleeson Land | Gleeson supports the settlement hierarchy |
| Bell Cornwell LLP for Hathor Property Limited | <p>Brimpton is classified as one of the smaller settlement. No allocations appear to be proposed in these settlements, contrary to the requirement in NPPF para 79 to plan for growth of rural villages. Rather, the villages would rely upon a limited number of infill or change of use/ windfall opportunities as allowed for within the settlement boundary under Policy SP1.</p> <p>Question the methodology and scoring in the Settlement Hierarchy evidence base document.</p> <p>Smaller settlements such as Brimpton should be given more priority in the settlement hierarchy, to allow for some small scale development / extension of settlement boundaries.</p> <p>Suggest allocate small sites less than 1ha in lower tier settlements such as Brimpton and allocate client’s site, west of Brimpton Road (not previously submitted for consideration in HELAA)</p> |
| Turley for <ul style="list-style-type: none"> • Hathor Property • Donnington New Homes • Pangbourne College | Approach is noted/supported. |
| Opus Works for Bewley Homes PLC and Calcot Park Golf Club | Settlement Hierarchy is supported. Consider that land at CPGC is suitable for allocation as it lies within the settlement boundary of the most suitable and sustainable location |
| Opus Works for | Policy SP3 – Settlement Hierarchy is supported and request is made for the land identified for development at Newbury and Crookham Golf Club to be included within the revised settlement boundary of Newbury. |

| Consultee | Main issues |
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| Chartfield Homes and Newbury and Crookham Golf Club | |
| White Peak Planning Ltd for Bloor Homes Ltd | Object. The focus on key urban areas, encompassing strategic sites and non-strategic sites is supported subject to inclusion of Land South of Gorse Covert as an expansion to Policy SP16 |
| TOWN for landowners of Land East of Pincents Lane | Support the identification of the Eastern Area as an urban area in the same hierarchy level as Newbury and Thatcham. SP3 must explicitly recognise the requirement to accommodate the needs of the eastern area within the eastern area policy. Yet the very limited amount of housing allocations in these areas means that much needed affordable housing in the east will not be accommodated there. |
| Carter Jonas for the Trustees of the Frank Wallis Estate | Focussing development at the largest settlements and on previously developed sites is supported. However, the majority of the proposed site allocations are on greenfield sites. Question whether sufficient sites on brownfield register and therefore considered that the reliance on windfall sites to deliver 1,949 dwellings over the plan period is optimistic. Anticipated that NDPS will assist in allocating sites for residential development, however progress is slow and additional sites should be allocated. |
| Bell Cornwell for Central Corporation Projects Ltd | Support continued recognition of Theale as a Service Centre and support Theale as a focus for additional housing within the Eastern area. The term would be better suited to 'Service Centre' as it is not accurate to describe Theale as a rural area, given its location on the edge of Reading, and in very close proximity to major road networks as well as large scale housing and employment areas. Theale's accessibility is higher than that described as 'rural service centres', and could be described as excellent. |
| Knight Frank for Limes Leisure Investments | Future development should be focused in urban areas, especially Newbury. |
| Pro Vision for Wasing Estate | <p>The Estate relies on diversification, and LPR policies may threaten this.</p> <p>Proposed settlement hierarchy is contrary to NPPF79.</p> <p>Neither Brimpton nor Aldermaston Wharf villages fall within the settlement hierarchy categories, despite having a defined settlement boundary.</p> <p>Object to inconsistent approach to development within settlement boundaries whereby development is considered acceptable in principle, but limited only to infill and change of use. This restriction should be removed to encourage growth in these areas.</p> <p>Support allocation of non-strategic sites in service villages, and allocating non-strategic sites in 'smaller villages' would not be inconsistent with the spatial strategy, e.g. at Aldermaston Wharf.</p> <p>Object to only identifying housing site allocations at the service village level and above – rural villages and areas are also able to make a contribution to housing supply.</p> <p>If development in smaller villages continues to be restricted, they will become unsustainable.</p> |

| Consultee | Main issues |
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| | <p>The LPR doesn't support the vitality of rural communities by failing to identify opportunities for growth – contrary to the NPPF.</p> <p>Aldermaston Wharf scored 21 points yet is not classed as a service village although it offers key services and functions of a 'service village' and has excellent public transport routes.</p> <p>Aldermaston Wharf and Aldermaston village are well linked and should be looked at holistically.</p> <p>Object to downgrading of Aldermaston Village from a service village to being outside of the settlement hierarchy – there has been no significant change nor loss of services/facilities.</p> <p>Rural housing is essential to ensure long-term viability of key services and facilities in rural areas and would support the aim to sustain a prosperous rural economy.</p> <p>Many people want to live in rural locations, so providing rural housing is consistent with meeting the district's needs and aspirations.</p> <p>BRIM1, BRIM2, and ALD5 are suitable locations to accommodate new residential development.</p> |
| Planview Planning for Leibreich Associates | <p>Policy doesn't include any reference to the use of previously developed land, which is not reflected in the overarching objectives of SP1.</p> <p>Regardless of other landscape policies, this policy should seek to deliver landscape enhancements through new development within settlements.</p> |
| Pro Vision for T A Fisher & Sons Ltd. | <p>Burghfield Common is identified as a 'Rural Service Centre', which can accommodate growth, but thus is in conflict with the approach to development within the DEPZ identified in SP4.</p> <p>Unjustified removal of site 'The Hollies' despite remaining 32 units to be delivered.</p> |
| Pro Vision for Mr. & Mrs. Pittard | <p>Agree with the proposed hierarchy,</p> |
| Thakeham Homes | <p>Approach to growth in Rural Service Centres is proportionate and appropriate. However, Lambourn as a Rural Service Centre has not been allocated enough housing to ensure sustainability and vitality (only 3% of housing allocations).</p> |
| Nexus Planning for Croudace Homes | <p>Support decision to direct growth towards Thatcham.</p> <p>Support for Thatcham's status as a 'top tier' settlement.</p> <p>However, additional levels of growth could be directed to Thatcham, or alternatively allow development adjacent to the settlement boundary, subject to criteria, to assist allocation at Henwick Park.</p> |

Summary of issues raised:

There is broad support for the settlement hierarchy, although some objections to the classification of individual settlements, notably Theale, Upper Bucklebury, Brimpton, Aldermaston Wharf and Englefield, from respondents seeking to either limit growth or to allocate additional development sites.

A number of consultees have criticised

- The more restrictive approach to development in the smaller villages arguing that there are a wider number of settlements that can take growth.
- The lack of allocations at some rural service centres, at Bughfield Common due to its location within the DEPZ and at Pangbourne and Stratfield Mortimer, in apparent conflict with their designation within the settlement hierarchy.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: SP4 AWE**

Number of representations received: 18

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
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| Basingstoke and Deane Council | Council has ongoing concerns about how restrictions relating to the AWE are applied, most notably, the limitations they place on future sustainable growth at Tadley. The council would like to continue to work proactively with Emergency Planners at West Berkshire to ensure a suitable approach is taken to future growth and change and that all options, including suitable housing allocations, are fully considered. |
| Reading Borough Council (RBC) | RBC supports the approach of policy SP4. The DEPZ for AWE Burghfield crosses the boundary of West Berkshire and Reading, and RBC commits to continue joint working with WBDC to consider the implications of any development in the area on the off-site emergency plan. |
| Aldermaston Parish Council | Only low density of population around AWE should be maintained for public safety. Concerned there is no record of approximate worker numbers in the area. Therefore it cannot be reasonably assessed whether any new commercial development could be accommodated in the off-site emergency plan. Request that WBC are made aware of AWE's position of objecting to all new development within the DEPZ that would increase the numbers of people or present a constraint to AWE. Past approvals should not be seen as an indication that future consents can be achieved. |
| Burghfield Parish Council | Conflicts with SP14 – an additional 60 houses in the Eastern Area that are unlikely to be developed and should be removed from the plan as undeliverable. |
| Bucklebury Parish Council | The LPR contains very little information on AWE Aldermaston and Burghfield, which is illogical given the significant impact these sites have had on the overall strategy and site selection. Changes to the DEPZ have a significant impact through the need for site allocations in other areas, like NE Thatcham. There has been an inconsistent approach to defining the DEPZ. Concerns regarding consultation with AWE, particularly given the scale of the NE Thatcham allocation, which is in the Outer Consultation Zone. |

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| | Lack of evidence that WBC has adequately consulted and considered the impact of AWE Aldermaston & Burghfield in the preparation of the LPR. |
| Office for Nuclear Regulation | ONR's published land use planning processes may apply to some of the developments within the West Berkshire LPR. In order for the ONR to have no objections to developments within ONR consultation zones, we will require: confirmation from the relevant emergency planners that the development can be accommodated within any emergency plan required under the Radiation Regulations 2019, and that the developments do not pose an external hazard to the site. |
| Environment Agency | The Environment Agency is part of an offsite planning group who are consulted by West Berkshire District Council on any development proposals in the Detailed Emergency Planning Zone (DEPZ) of the AWE sites. Would expect that AWE, or any other organisation undertaking new activities in developments considered under DM33 to consult with us if their activities would require environmental permits. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------------|--|
| RPS for Atomic Weapons Establishment | <p>Consider Policy sound</p> <p>AWE welcomes reference in the Policy to the Detailed Emergency Planning Zone (DEPZ).</p> <p>AWE supports the policy and footnote 10 which recognises that the DEPZ criteria may change over time and it is the Council's intention to follow the latest ONR guidance which may change from time to time.</p> <p>AWE is seeking some alignment across the plan as to how the function of the sites is explained.</p> <p>Para 4.37 should read</p> <p>"Both AWE sites as <u>Government research and defence establishments</u> are core to sustaining the UK Government's nuclear deterrent and support national defence and security and in particular the delivery of the warhead contribution to the national and international nuclear deterrent"</p> <p>Paragraph 4.40 incorrectly refs para 95 of the NPPF, not 97, correction required.</p> <p>Paragraph 4.56: The word 'normally' should be removed, and the supporting text should set out very clearly the circumstances in which the Council will not follow the ONR's advice.</p> <p>Paragraph 4.57: AWE welcomes the flexibility afforded by this paragraph</p> <p>Paragraph 4.58: AWE welcomes the flexibility to the application of Policy SP4 in the event the DEPZ is amended under the REPPIR legislation.</p> |

Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | <p>Nothing to say that WBC have done anything more than read the ONR website. The policy will have a large impact and ONR should have been consulted.</p> <p>I hope the Plan will attempt to match Jobs with appropriate Housing.</p> <p>There has been no change in activity, safety or risk, but the criteria required to evaluate the risks against. Therefore why was the zone reduced from 8km to 5km (OCZ), and the OPZ reduced from 15 to 12km?</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
|------------------------|---|
| Charlesgate Homes Ltd. | <p>The policy presumption appears to be against development, in contrast to the NPPF goal of a presumption in favour of new development.</p> <p>It is understandable that there is a need to control development in this area so as not to cause a detrimental impact on a facility that aids national security.</p> <p>Throughout the LPR it has been advised that no additional residential development within the DEPZ in Aldermaston and Burghfield will be considered for allocation due to WBC emergency planners advising that no additional residential development can be accommodated within the emergency plan. However, there doesn't appear to have been any site assessment undertaken for any sites being promoted in the LPR.</p> <p>It appears, through the HELAA that any site within the out of date DEPZ has been omitted from further assessment and suggests that WBC are seeking a moratorium on any additional houses or businesses within the DEPZ.</p> <p>A site assessment and risk assessment on AWE Burghfield of SUL1 has been undertaken [by the respondent] as well as an assessment of the current DEPZ and SP4. In summary:</p> <ul style="list-style-type: none"> - The proposed development site is outside the Urgent Protective Action Zone where prompt protective actions (shelter) are estimated to provide a net benefit. Therefore no detailed emergency plan is required to enable urgent protective actions at this site. - The potential radiation dose to people living on the proposed development site and the probability of any event occurring to affect the site is so low that it can be asserted with confidence that the AWE Burghfield site does not pose a significant risk to those who might live in the development. - The dose rates at the proposed development site during and after an emergency event would be so low as to allow life as normal including visits by emergency services and care providers. - There are a number of sensible options to redefine the DEPZ such that the proposed development site would lie outside of it, which would remove all REPIR-19 requirements except those associated with severe accidents and outline planning. - AWE Burghfield will not be affected by external hazards resulting from residential development at this distance. |

| Consultee | Main issues |
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| | <ul style="list-style-type: none"> - The development will not affect the ability of the emergency services to access the site, and therefore no impact on the ability to respond to an event at AWE Burghfield. - The proposal doesn't lead to serious safety concerns nor breach the ONR demographic criteria. - The proposal would not present a barrier to the emergency services to carry out their duties, nor a barrier to the Council to carry out obligations under the REPPiR plan. - Given the above, the Council can give the ONR adequate assurance that the proposed development can be accommodated within their off-site emergency planning arrangements (or an amended version) and thus allowing ONR to approve the development. <p>The approach in SP4 does not allow each site to be considered on its own merits and constrains all additional net housing in this location, especially given that Burghfield is a rural service centre and a good location for much needed housing.</p> |
| Savills UK for the Englefield Estate | <p>Important to note that some recent development in the DEPZ has been considered to be appropriate. In January 2023 an Inspector allowed a residential development of 49 units within the DEPZ at Three Mile Cross (within Wokingham borough)</p> <p>The DEPZ for both AWE sites was recently reviewed in January 2023 and has already resulted in minor changes to the DEPZ for AWE Burghfield, which need to be reflected in Appendix 3 of the LPR. Support the need to maintain ongoing review throughout the plan period, Should the DEPZ change, this should be a trigger for a review of the LPR and reconsideration of appropriate sites for residential development, such as at the Estate's land at Grazeley, Burghfield Common and Green Park – Suggested amendment supplied.</p> |
| Gleeson Land | <p>Gleeson supports the Council following the ONR advice as and when it may change.</p> <p>Should the area covered by the DEPZ change as a result of new modelling, or if the advice of the ONR changes, then the Council's approach to new development within the currently affected areas should also change.</p> <p>The capabilities of the Emergency Planning Services may change over time and if they improve then consideration should be given to whether any new residential development could come forward at Burghfield Common, without unduly affecting the off-site emergency plan for AWE Burghfield. The Council should work alongside the emergency services to improve their capability to better respond to any off-site emergency, with the goal for additional response capacity that would enable a suitable amount of development to come forward to support the continued role of Burghfield Common as a Rural Service Centre.</p> <p>Considered that should a material change occur during the plan period to the DEPZ then a review of the plan should be commenced at the earliest opportunity.</p> |
| John Cornwell for I Cheshire Esq, The Russell Trust, and R. Shaw Esq. | <p>Representation re. Land 'Land to the rear of The Hollies Nursing Home, Reading Road and Land opposite 44, Lamden Way, Burghfield Common'. (HSA16 of the HSS DPD).</p> <p>A similar Policy to that now proposed, has been in place in both West Berkshire, Wokingham Borough, Reading Borough and Basingstoke and Deane District for some 15 years. It has led to serious inconsistencies in decision making</p> |

| Consultee | Main issues |
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| | <p>depending on the LPA area involved; and to tensions, with Members often overriding Emergency Planning and ONR objections to allow the development concerned.</p> <p>Refers to site at Three Mile Cross, in Wokingham Borough (located outside of a settlement boundary, larger than the H16 site, located north-east of AWE Burghfield and therefore downwind of the facility), which was allowed at appeal at public inquiry, where evidence was able to be tested. The Inspector made it clear that there must be some flexibility in the application of these AWE policies; that they cannot reasonably be used to apply a blanket refusal to accept any further development within the DEPZ. Development proposals must rather be determined on the basis of the weighing of the factors in each individual case.</p> <p>Suggested policy wording for SP4 supplied.</p> |
| Pro Vision for T A Fisher & Sons Ltd | <p>Representation re. Land 'Land to the rear of The Hollies, Burghfield Common' (HSA16 of the HSA DPD).</p> <p>The updated REPPiR Regulations (2019) resulted in the extension of the DEPZ around AWE Burghfield to include the settlement of Burghfield Common. However, this has not prevented the delivery of development within the DEPZ. Indeed, the Annual Monitoring Report (AMR) (January 2023) shows at Table 3.7 that Phase 1 of Policy HSA16 was completed in 2021/2022, whilst Table 3.20 identifies there is an outstanding commitment for 114 dwellings within the DEPZ at Burghfield.</p> <p>In AMR Council state that development within the DEPZ will be "<i>monitored</i>". This is entirely different from placing a 'moratorium' on all development in the DEPZ. There is clearly therefore an inconsistency between the Local Plan evidence base</p> <p>Clear at a Pre-application meeting held in October 2022 that a 'line in the sand' was drawn by the Council's Emergency Planning Officer who decided that sites with outline planning permission should be included in the Emergency Plan's provisions and to exclude sites that were allocated for development. Allocated sites should automatically be included within the provisions of an Emergency Plan, regardless of whether they have achieved planning permission or not. It is only the Council's role to <i>consider</i> whether proposed development can be accommodated within the off-site Emergency Plan, not to treat the DEPZ as an absolute constraint onto any development. The REPPiR-19 Regulations clearly do not support the Council's 'moratorium' on development in the DEPZ. Reference to appeal decisions at Boundary Hall, Tadley in 2011 and Three Mile Cross in Wokingham, which serve to highlight that residential development in the DEPZ can be allowed.</p> |
| Deloitte for Green Park(GPR) | <p>Subject to appropriate emergency planning, it is not anticipated that non-residential development would have a significant impact on the off-site emergency plan for AWE Burghfield. Furthermore, it is considered that employment uses identified in either extant planning consents or established business park locations should also still be recognised as appropriate for further development of the same use.</p> <p>Request that clarification is added to Policy SP4 that although the ONR will be consulted, it is unlikely this will restrict non-residential development in the DEPZ subject to appropriate consideration of emergency planning.</p> |

| Consultee | Main issues |
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| Pro Vision for Hope & Clay Construction Ltd. | <p>Representation re. Easter Park.</p> <p>WBC are no longer proposing to allocate Easter Park as designated employment site, nor are they considering its extension for additional employment floorspace, due to location within the AWE DEPZ.</p> <p>The updated HELAA confirms that sites within notified safety zones will not automatically be excluded but impact assessed on merits. The recommendation drawn by the SA/SEA is clearly inconsistent with the conclusions of the HELAA and its methodology and no clear reason has been provided as to why this suitable employment site is ruled out purely because of its location within the Aldermaston DEPZ.</p> <p>The Regulation 18 draft LPR was published for consultation after the REPPiR Radiation Regulations 2019 were revised so reasonable to assume the Council would have taken account of these.</p> <p>The Regulations and Guidance do not preclude development within the DEPZ. It is the Council's role to consider whether proposed development can be accommodated within the off-site emergency plan, not to treat the DEPZ as an absolute constraint.</p> <p>Council's approach risks undermining the long term viability of this established employment site, inconsistent with national policy. The LPR does not identify sufficient sites to meet the identified need resulting in significant shortfall in employment land provision.</p> |

Summary of issues raised:

Some support for policy, including from the Atomic Weapons Establishment but some concern from developers and site promoters that the DEPZ should not be taken as an absolute constraint and that development proposals should be determined on an individual basis, with consideration of whether development can be accommodated within the off-site emergency plan.

Representations from promoters of currently allocated housing site HSA16, now no longer proposed for allocation and for employment site at Easter Park – both within the DEPZ.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: SP5 Climate Change**

Number of representations received: 29

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---|---|
| Reading Borough Council (RBC) | RBC supports this policy. Both WBDC and RBC have declared a Climate Emergency, and application of this policy will be critical in moving towards net zero carbon in the area. |
| Royal Borough of Windsor and Maidenhead | Pleased to see the West Berkshire Local Plan Review includes a policy (SP5) on responding to climate change, in particular setting ambitious expectations that new development will achieve net zero operational carbon |
| Theale Parish Council | The plan proposes to build on peat bog which is a flood plain (RSA11), and would increase risk of flooding to Theale – in conflict with SP6. The peat also helps assist climate change due to carbon capture and therefore this policy is in conflict with RSA11. |
| Hermitage Parish Council | Support policy |
| Burghfield Parish Council | No mention of micro-generation e.g. solar panels on houses and micro wind turbines and their use where appropriate to assist with reducing the district's carbon footprint. |
| Environment Agency | To ensure flood risk is assessed against climate change we ask that an additional point is included in the criteria that all developments will be expected to satisfy. There should be a bullet point about protecting and conserving the water environment - not just in terms of water quality and resources (as in bullet point h), but in terms of protected and important species and habitat - particularly relevant to the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) status' There should be a point about having at least 10% BNG at every site to help mitigate against climate change mitigation effects. |

| Consultee | Main issues |
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| | In paragraph 5.1 believe 'nitrous monoxide' should be 'nitrous oxide'. Some suggested amendments supplied |
| Historic England | Broadly support criterion m, but it could be unintentionally constraining as there are ways other than reversibility and minimum intervention that could enable improved environmental performance. Advise also referring to a 'whole building approach' as mentioned in 5.55 and 10.92. Suggested alternative wording provided. |

General Consultation Bodies:

| Consultee | Main issues |
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| Network Rail | This policy should be consistent with NPPF requirements with regard to supporting/promoting sustainable transport. Concerns that opportunities to support sustainable transport and specifically encourage modal shift have been missed. Therefore inconsistent with NPPF 152- 154. |
| Home Builders Federation | Part c and d are unsound as they are not consistent with national policy relating to technical building standards. Consider that the most effective way of achieving net zero by 2050, alongside delivering the homes required to meet the needs of the country, is through the application of building regulations and the Future Homes Standard. |
| Canal & River Trust | It is not clear why 'blue' has been removed at bullet point k as the plan refers to blue and green infrastructure numerous times. |
| DPDS Consulting for Thames Valley Chamber of Commerce (TVCC) | TVCC supports the Council's commitment to responding to the ongoing climate emergency, and agrees with the criteria set out within this policy. However, the policy could provide greater clarity on the thresholds for each criteria. |

Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | Why is WBC not insisting on all the new properties being built with solar and wind power, as well as any other long term eco building practices? Policy is a bit old fashioned. More policies should be included under this as an umbrella topic – list provided. West Berks CO ₂ emissions are higher than national, south east and Berkshire yet there is no specific action plan to address the climate emergency. Without this, the plans for growth will worsen an already dangerous situation. |
| Cllr Alan Macro | Support policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|---|
| Rectory Homes | Will take time to facilitate zero carbon development. Most effective way of achieving more energy efficient housing is through application of building regulations and implementation of the Future Homes Standard. Object to requirement to achieve highest viable levels of energy efficiency (part d) as would require viability assessment with every application leading to delays. Requirements under policy provide no certainty as to what is expected, contrary to NPPF para 16, therefore parts c) and d) unsound as not consistent with Framework relating to technical building standards. |
| ET Planning for Messers. Marriage | Suggested that reference is made to supporting infrastructure associated with renewable energy such as battery storage, and the key role these provide in ensuring energy is sustainable. Battery storage also needs to be in suitable locations in close proximity to the renewable source, which should be recognised in the policy. |
| Pegasus Group for Donnington New Homes | Support the principles of this policy. However, the introduction of the requirement to ' <i>achieve net zero operational carbon development</i> ' poses a risk to the viability of new development which, in turn poses a risk to the delivery of new development. The inclusion of the words ' <i>....will be required to...</i> ' represents an excessively onerous expectation. Part L of the Building Regulations provides a measurable benchmark against which new development could be considered - the wording should be amended to require <u>new development to comply with the Building Regulations in force at the time the development is considered</u> . The deletion of the 'blue' infrastructure from 'k.' of the policy limits the valuable contribution new and existing water environments can make to the ability of new development to positively respond to climate change over time. |
| PSP Consulting for Beftonforth Ltd. | Policy criteria should also include a requirement to demonstrate how opportunities to secure the sustainable movement of freight have been maximised and secured. Proposed changes to policy supplied. |
| Firstplan Ltd, for Englefield Estate | Representation re Rail-Road Transfer Site at Theale. Failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes - support for growth of the Rail-Road Transfer Site at Theale is sought. Suggested amendment to include in policy, as new criteria g, <u>To demonstrate how opportunities to secure the sustainable movement of freight have been maximised and secured.</u> |
| Planning Issues for Churchill Retirement Living | Phased approach to net zero contained in the buildings regulations is more pragmatic. Appropriate uplift to build costs for delivering net zero should be allowed for in the forthcoming Local Plan Viability Assessment. |
| Thakeham Homes | Thakeham does not support the creation of bespoke policies and suggests the most effective way of achieving the national ambition to be net zero by 2050, alongside delivering the homes required to meet the needs of the country, is through the application of building regulations and the Future Homes Standard, and any opportunities for developers to |

| Consultee | Main issues |
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| | exceed this. Creating bespoke policies which may require different building techniques is likely to only restrict the delivery of homes, therefore Thakeham does not support parts C and D of Policy SP5. |
| Gleeson Land | Considered that most effective to follow the national Future Homes Standard that will be delivered through building regulation changes, which will require new homes to be zero carbon ready by 2025. There is no need to replicate this requirement in Policy SP5 (c) and (d), and it is therefore considered that these points should be removed. |
| Bell Cornwell LLP for Hathor Property Limited | The policy is not clearly drafted. Of key concern is the fact that the detailed requirements of sub clauses a) to m) (setting out carbon neutrality measures) will be expected “depending on the nature and scale of proposals”. Policy needs to be redrafted to make clear what scale of development will be subject to the requirements of the proposal. Difficult to understand how the whole plan viability assessment has assessed the cost implications of policy SP5, when the policy itself does not give any indication what scale or type of development proposal will be subject to it. |
| Turley for <ul style="list-style-type: none"> • Hathor Property • Donnington New Homes | We support the general aim of this policy, however the wording should require conformity with Building Regulations in force at the time of development coming forward. There is vagueness within the policy relating to the viability of energy efficiency levels. This provides uncertainty for developers. |
| White Peak Planning Ltd for Bloor Homes Ltd | Supports the Council’s objective but requires amendment: Criterion c. should also be amended to reflect the reality that the energy solution for a site must be viable to be deliverable Criteria d. and e. of Policy SP5 should be removed. Criteria d and e are appropriately included in the more detailed climate change development management policy (DM4). |
| Lucy White Planning for Bradfield College | Support the principles of policy SP5 to deliver development which is resilient to climate change, and in particular recognition that application of the policy will depend on nature and scale of the proposals. Often impractical or inefficient in the case of small extensions or alterations to overhaul the energy strategy for the building as a whole or introduce a separate energy strategy. Bradfield college is looking for ways to use renewable and low carbon infrastructure in order to reduce carbon emissions. In accordance with NPPF 155 and 156, policy SP5 should support the preparation of whole development renewable and low carbon energy strategies, which should be taken into account in planning applications for individual development proposals. Any local requirements for the sustainability of buildings should reflect Government’s policy for national technical standards and should not require exceeding the current Buildings Regulations requirements. Regarding criteria c and e - the policy should support the development of energy strategies which could meet the needs of the whole development through renewable and low carbon energy and recognise that it may not be feasible or practical for individual elements of a development to generate and supply energy. |
| Lochailort Newbury Ltd | Conflict with minimum parking standards set out in DM44, particularly with regard to highly sustainable locations and to bullet point f which seeks to reduce car usage. |

| Consultee | Main issues |
|--|---|
| Planview Planning for Leibreich Associates | <p>Level of detail required by proposals is vague and unclear for applicants, meaning the policy is open to interpretation and thereby missing the opportunity to encourage sustainable development.</p> <p>No clarity as to what 'baseline' sustainability is required or how development that goes beyond what is expected will be treated.</p> <p>The policy should be amended to provide clarity on what is expected as part of a planning application. Weight and support should be afforded to development which exceeds the standards. Suggested wording provided.</p> |

Summary of issues raised:

Significant support for the principles of the policy setting ambitious expectations for achieving net zero carbon.

A number of objections were raised, including:

- From the Home Builders Federation and a number of developers/site promoters making the case that new development should be considered against Building Regulations and implementation of the Future Home Standard.
- That the policy should support/promote sustainable transport, encourage modal shift and sustainable movement of freight.
- Questioning why 'blue' has been removed as the policy refers to green and blue infrastructure, and suggestions from the EA that should be a bullet point about protecting and conserving the water environment.
- Concerns over clarity of what is required and viability of development
- Potential conflict with minimum parking standards set out in DM44.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP6 Flood Risk

Number of representations received: 12

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|------------------------------------|--|
| Holybrook Parish Council | Holybrook Parish Council would like to see the floodplain in the Eastern Area protected and, ideally, made into conservation areas. Preserving the floodplain and maintenance of the Holy Brook should be an integral part of WBC's Climate Change Policy. |
| Stratfield Mortimer Parish Council | On pre-developed sites, the maximum discharge rate equivalent to 50% of the existing 1 in 100 year runoff rate is not acceptable, essentially equivalent to a 1 in 10 year event, and could lead to relatively frequent flooding. A 1 in 50 year runoff rate would be more appropriate. |
| Environment Agency | To ensure the policy adequately complies with national policy, a few amendments will <u>need</u> to be made to the policy text. Suggested amendments to points 'd' and 'p' of SP6, paragraphs 6 and 8 of policy and paragraph 5.17 are supplied. In penultimate paragraph of Policy SP6 appears there a reference missing hence the empty brackets. It should be understood that NFM measures may not always be appropriate/possible. This should be acknowledged. |
| Thames Water | Flood risk sustainability objectives should accept that water and sewerage infrastructure development may be necessary in flood risk areas. Flood risk policies should also make reference to 'sewer flooding'. Stress importance of SuDS and suggest an additional paragraph in the policy or supporting text (see representation). |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | Evidence of flooding has been found but flooding on surrounding areas and impact on surrounding houses has been ignored. Would prefer SuDs to have its own policy rather than SPD, as it is not given effective consideration in planning applications. The SuDS SPD states that all developments in Newbury should include a surface water management strategy, but as this is not a validation requirement, it doesn't happen. FRA only required for 1ha, which could house more than 10 dwellings therefore complete flood risk would be unidentified. The policy seems to repeat much of what is national policy or guidance, but does not reference the methodology for determining cumulative impacts from all sources in NPPF 160. |
| DPD Consulting Group for Newbury Community Football Group | Supports the strict application of the sequential approach to sites within Flood Zones 2 and 3, along with the requirement for a site-specific flood risk assessment for all developments located within Flood Zone 2 or 3. |
| Cllr Alan Macro | Support policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|--|
| TOWN for landowners of Land East of Pincents Lane | Identify a number of errors in the production of the Strategic Flood Risk Assessment and Sequential Test. Failure to demonstrate the allocations comply with the sequential test is a significant error. The evidence base does not demonstrate that an exercise to comply with NPPF para 11 b) i) has been undertaken to show for example how levels of flood risk at North East Thatcham ought properly to restrict the physical extent or quantum of development. |
| Lochailort Newbury Ltd | Noted that Policy SP6 requires that the Sequential Test is strictly applied in all areas of flooding. The policy also notes that allocated sites will have been subject to the Sequential Test at the plan-making stage. Kennet Centre is entirely suitable to be allocated and the requirement for a Sequential Test as part of the planning application process, when a site allocation would forgo such need, results in additional and unnecessary bureaucracy and results in a Local Plan that fails to meet soundness requirements of the NPPF in terms of delivery. |
| Planview Planning for Leibreich Associates | Policy doesn't state what weight and support should be given to development which improves flood risk on site or on neighbouring sites. Weight should be afforded to these developments. Suggested wording provided. |

| Consultee | Main issues |
|-----------|-------------|
| | |

Summary of issues raised:

- Preservation of floodplains, with potential to designate as Conservation Areas.
- A 1 in 100 year runoff rate could lead to more flooding. A 1 in 50 year runoff rate would be more appropriate.
- In the application of the Sequential Test, criterion d should be revised to make clear that development will be safe for its lifetime.
- Paragraph 6 should be reworded for clarity so that it reads *'If the sequential test shows that it isn't possible for an alternative site to be used and therefore development has to be located in a flood risk area, it should be demonstrated that:..'*
- Paragraph 8 should be reworded for clarity so that it reads *'In addition to the sequential test, the exception test must be applied in certain situations according to national policy. This includes highly vulnerable development in flood zone 2, essential infrastructure in flood zone 3a or 3b, and more vulnerable development in flood zone 3a. The exception test should demonstrate how flood risk would be managed on site so that the development is safe taking into account the vulnerability of its users, and that it will not increase flood risk elsewhere. The exception test will also need to show that the sustainability benefits of the development to the community outweigh the flood risk.'*
- Criterion p should be reworded to recognise that it is not always appropriate /possible to provide Natural Flood Management measures.
- Paragraph 5.17 should be reworded to read *'The sequential approach should be taken when determining the layout of a development site, meaning the most vulnerable development should be sited in the areas of lowest flood risk within the site.'*
- Policy needs an additional paragraph to make clear that it is the responsibility of the developer to make proper provision for drainage to ground, water courses or surface water sewer.
- Impact of flooding on surrounding areas and houses not considered.
- Surface Water Management Strategy not included on the validation checklist.
- No reference to methodology for determining cumulative impacts from all sources of flooding.
- FRA not required for sites below 1ha.
- Support for strict application of Sequential Test.
- Failure to demonstrate allocations comply with Sequential Test.
- Kennet Centre suitable for allocation so should not need to have a Sequential Test submitted at the planning application stage.
- Policy should be revised to afford weight to developments which improve flood risk on site or on adjacent sites.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP7 Design Quality

Number of representations received: 17

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|------------------------------------|--|
| Theale Parish Council | Object to the first sentence as the proposals in the plan would not be in keeping with Theale's character. Object to 5.32 c, e, and f as it conflicts with climate statements as there is potential to encroach on public open space. Theale already lacks sufficient public open space. |
| Holybrook Parish Council | Would like to see policy strengthened to state: <i>"cut and paste" design of substantial housing developments will not be permitted</i> . |
| Stratfield Mortimer Parish Council | 5.30 (f) refers to local communities taking responsibility for their public places, which is a shift from the usual maintenance by local authorities. If parish councils are to lead such activities there needs to be consultation on how this can be achieved and financed. |
| Environment Agency | Paragraph 5.31 appears to contradict the Policy SP6 – Flood Risk of having an undeveloped buffer of 10m alongside and on both sides of main rivers (the Kennet & Avon Canal). We suggest that reference is made to this requirement in Policy SP6 in this section of Policy SP7. This is to ensure the provision of ecological corridors and protection of species and habitat which use the riverbanks and the water as required by national policy. Suggested amendment supplied. |
| Speen Parish Council | There is scope to be more ambitious regarding specifying acceptable design quality. The term 'high quality' should be defined in order to be enforceable. 5.30 h – needs to be specific mention of increased home working with regards to 'functionality. |
| Historic England | Suggest design codes or guides are referred to (albeit that 'community planning documents') may include such guides or codes. Suggested wording provided. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | Not clear whether the national design codes or new national model design codes will be adopted, or whether they will be specific design codes required by the NPPF. Should state which part of the new and old national codes should be complied with and list other policies in the plan which will input into design quality. Will the old design SPD and design policies of the 2006 Core Strategy become defunct? The Newbury Conservation Area appraisal is still under negotiation. Some of the links in the policy don't work. 5.35 – there is no list of documents required at the validation stage. |
| Cllr Alan Macro | Support policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|--|
| Ridgepoint Homes | Support the requirement to strengthen a sense of place through high quality locally distinctive design and place shaping. Don't consider appropriate to refer to the National Design Guidance (2021), but instead local level design guidance, and the now deleted design principles shown in the tracked changes policy are re-inserted. |
| Southern Planning Practice for Saunders Family | Support amendment to require new development to reflect the National Design Guide. |
| Rectory Homes | Support amendments which streamline policy. Agree should refer to National Design Guide, National Design Codes or any local design guidance. |
| Boyer for <ul style="list-style-type: none"> • Sovereign • Darcliffe Homes | Reference within this policy to 'relevant community planning documents' is problematic, as the phrase is not considered to relate to any specific identified set of considerations – suggest change to 'material considerations'. |
| Opus Works for: <ul style="list-style-type: none"> • Bewley Homes PLC and Calcot Park Golf Club • Chartfield Homes and Newbury and | Policy SP7 – Design Principles is supported. |

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| Crookham Golf Club. | |
| Pro Vision for T A Fisher & Sons Ltd | This policy has been amended to remove the design criteria; some design criteria would be useful in helping developers to ascertain the design approach that is expected by the LPA. |
| Planview Planning for Leibreich Associates | No reference to the weight that should be afforded to good design in decision making. NPPF requires that great weight should be afforded to good design. Policy doesn't go far enough to encourage developments to deliver excellent design. Suggested wording provided. |

Summary of issues raised:

There is general support for Policy SP7 with several suggestions for strengthening the policy.
The Environment Agency raised the potential conflict of paragraph 5.31 with the SP7 requirement for buffers alongside the Kennet and Avon Canal.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP8 Landscape Character

Number of representations received: 14

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|-----------------------|--|
| Theale Parish Council | Object to point c, - new development in Theale is already over scale. 5.39 – object, as new development in Theale has already impacted the landscape and therefore this statement is in conflict. |
| Speen Parish Council | Support the underlying Landscape Character Assessment, in particular no development west of the A34 in Speen Parish. |
| Historic England | Support for policy |

General Consultation Bodies:

| Consultee | Main issues |
|-------------------------------|--|
| West Berkshire Heritage Forum | The Berkshire Gardens Trust has a larger role than the LPR suggests. It has carried out a survey of historic parks in central and eastern Berkshire and wishes to extend this to West Berkshire. |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | Maintenance of the landscape will depend on owners having the income and desire to do so. For larger landscapes this is straightforward, but for smaller, private landscapes e.g. land attached to housing estates, diversified ownership is not likely to produce desired results. A common policy for maintenance of all publically used landscapes is needed. Not sure whether town and parish councils have had input into these. Appears to be no landscape character appraisal for RSA3. |

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| Cllr Alan Macro | Support for policy |
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Landowners, site promoters and developers:

| Consultee | Main issues |
|---|--|
| Ridgepoint Homes | Don't consider it necessary for a landscape assessment to accompany all proposals for a development, particularly householder and small-scale developments which may render them unviable. Suggest this is amended to refer specifically to major development within or adjacent to protected landscape designations. |
| Pegasus Group for Donnington New Homes | Generally supported. However, reference to the 2019 West Berkshire Landscape Character Assessment could become outdated during the lifetime of the Plan. |
| Boyer for <ul style="list-style-type: none"> • Sovereign • Darcliffe Homes | As currently formulated, the policy requires that all development, of any scale, would need to be supported by an appropriate landscape assessment. This is considered to be unduly burdensome on minor forms of development and may not be appropriate in all cases where major development is proposed. Suggested amendment. |
| Opus Works for <ul style="list-style-type: none"> • Bewley Homes PLC and Calcot Park Golf Club • Chartfield Homes and Newbury and Crookham Golf Club. | Support for policy. |
| Planview Planning for Leibreich Associates | No reference to the weight that should be afforded to developments that provide enhancements to the landscape, which is a missed opportunity to encourage landscape enhancements. Suggested wording provided. |

Summary of issues raised:

There is general support for the policy.

Some comment from developers/site promoters that the requirement for landscape assessments for all development may be unduly burdensome and impact viability.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP9 Historic Environment

Number of representations received: 14

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|-----------------------|---|
| Theale Parish Council | <p>Planning condition on a recent planning application regarding the requirement for a programme of archaeological works in accordance with a written scheme of investigation prior to development is in conflict with SP9, and should be included in the Plan.</p> <p>The policy refers to development that would lead to substantial harm – Theale high street is a conservation area and additional development would have a detrimental effect.</p> |
| Historic England | <p>Object to policy.</p> <p>'Enabling development' should not appear in the plan as it specifically deals with departures from planning policy. If criteria for 'enabling development' is included, then a proposal could comply with that policy and thereby would not be considered as enabling development. Text on enabling development should be removed due to conflict with NPPF 208.</p> <p>The policy is missing 'and' after criterion j, which is in conflict with NPPF 201.</p> <p>Concern that only two Conservation Area Appraisals (CAAs) are in place for 53 Conservation Areas. This has the potential to undermine the implementation of DM9.</p> <p>Recommend moving the text on the programme for CAAs/CAAMPs from DM9 to SP9 as this is a strategic issue.</p> <p>Recommend including additional text to strengthen Council's commitment to producing CAAs to support implementation of DM9 – suggested wording provided.</p> <p>5.45 – there are a number of processes through which non-designated heritage assets may be identified, not just through the Council. Suggested wording provided.</p> <p>5.54 – the significance of a heritage asset includes its setting – suggested wording provided.</p> <p>5.55 – welcome reference to taking a whole building approach</p> |

General Consultation Bodies:

| Consultee | Main issues |
|-------------------------------|--|
| West Berkshire Heritage Forum | Generally, SP9 is welcomed. A proposal to update the HEAP has been submitted to the Heritage Service. The value of Conservation Areas is directly related to the approval of a Conservation Area Appraisal and little to no progress has been made on this which should be rectified. The support of Council to extend local listing under the agreement with the Heritage Forum is welcomed. This could be assisted by directing parish councils towards the forum when proposed developments may impact on heritage assets. |
| Newbury Society | No detail to support the role of the Council's conservation officers which is crucial if positive action for the protection of heritage assets is to be achieved. |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | The exact amount of listed buildings and not approximations should be used, especially considering total net listed builds and Scheduled Monuments are part of the outlined monitoring plan and objectives. The relevant objective is named heritage, not historic environment. Both the policy and the objective could do with being renamed Heritage and Historic Environment. The local history society and Newbury society sometimes feel marginalised regarding their input into key policy and planning applications. |
| Cllr Alan Macro | Support policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|---|
| Barton Willmore, now Stantec for <ul style="list-style-type: none"> • The Sulham Estate • Yattendon Estate • Donnington Valley Group Ltd | Policy is not consistent with national policy. Points f) and g) relate to Local Heritage Assets and, on this basis, Policy SP9 is interpreted as affording the same level of protection to designated and non-designated heritage assets. This does not accord with paragraph 203 of the NPPF which, for applications which directly or indirectly affects non-designated heritage assets requires a 'balanced judgement. We note that there is no requirement within the NPPF for development that has an impact upon a non-designated heritage asset to maximise opportunities to preserve or enhance it. The Draft Local Plan sets a higher standard than the NPPF, which could inhibit the delivery of sustainable development. Representation includes suggested amendments to wording of policy. |
| Lochailort Newbury Ltd | The policy should be divided into designated and non-designated heritage assets. |

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| | <p>Harm to setting is not a test in the NPPF and one cannot substantially harm 'setting'. Harm arising from development in a setting needs to be understood as harm to the significance of that asset, where setting contributes to that significance. Some unnecessary wording and discrepancies in wording compared with that in NPPF. Suggested amendments supplied.</p> <p>The section on enabling needs to be re-written in accordance with the guidance set out in HEAN4 (Enabling Development and Heritage Assets).</p> |
|--|--|

Summary of issues raised:

Some general support for policy with some suggested wording changes, in particular from Historic England.

Objections include:

- Inclusion of 'enabling development' in policy (from Historic England)
- Concern over number of Conservation Area Appraisals in place which has potential to undermine implementation of DM9 and recommendation, from Historic England, that the programme for implementation be moved from DM9 to SP9 as it is a strategic issue.
- Points f) and g) interpreted as affording the same level of protection to designated and non-designated heritage assets, which is not in conformity with NPPF paragraph 203.
- Harm to setting is not a test in NPPF. The significance of a heritage asset includes its setting.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP10 Green Infrastructure

Number of representations received: 19

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|-------------------------------|--|
| Theale Parish Council | The Blossom Lane peat bog area conflicts with the site selection. |
| Reading Borough Council (RBC) | RBC generally supports this policy, but it lacks recognition of the need to link into identified green links or corridors within adjoining areas. Reading Borough Local Plan has identified Green Links that connect to the boundary. Criterion g of the proposed policy particularly recognises the importance of wildlife connectivity in urban areas, and this could therefore benefit from a reference to connections beyond the boundary. Suggested additional wording supplied. |
| Environment Agency | Suggest that the title is changed to - Blue Green infrastructure. In bullet point 'o', the provision of 'buffer strips' is mentioned. This should be changed to buffer zones to match with the rest of the wording in the plan. It will be useful to also state that these buffer zones need to be at least 10m wide and should be planted with primarily local native species of UK genetic provenance and used to provide habitat and corridors for species which use the riverbanks and the water. |
| Historic England | Welcome criterion j. |
| Sport England | Disappointed by lack of reference to formal sport facilities and playing fields. The plan should have addressed the short fall in provision using evidence from the playing pitch strategy by protecting and enhancing existing sites, and providing more. E.g. Henwick Worthy sportsground is constrained and needs to expand. A solution would be to allocate land the other side of Tull Way – reallocating the sports hub here, and allocating the current site for housing, to pay for it. The plan fails to recognise the benefits of sport by not identifying playing fields as an asset in 5.62 (was 5.64). There should be a policy referring the playing pitch strategy and the need to enhance and provide playing fields. |

General Consultation Bodies:

| Consultee | Main issues |
|--|---|
| DPDS Consulting for Thames Valley Chamber of Commerce (TVCC) | TVCC supports the inclusion of amenity green space, such as outdoor sports facilities, as a type of green infrastructure asset. The TVCC fully supports the retention of the football ground for community sport use and as a key green infrastructure asset. |
| Mid & West Berkshire Local Access Forum | Not to include a separate policy on Public Rights of Way is not consistent with the West Berkshire Minerals and Waste Local Plan, and does not provide appropriate protection. A separate policy should be provided (suggested policy provided). The text that has been added to Policy SP10 would complement a separate policy on public rights of way and should be retained. |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | No proper evidence work within the LPR; the Green Infrastructure SPD from old policy CS18 never materialised. Significant opportunities have been missed due to lack of GI strategy, categorisation and mapping by typology. Led to misidentification of the Old Newbury Town Football ground as brownfield at one stage. Should be allocated separately as a site of community value. In the absence of proper categorisation the Playing pitch strategy has prevailed and led to the identification of an important natural green space which acts as SuDs as a football pitch (Manor Park). Playing pitches should be provided as part of developments rather than taking over land that serves other purposes. Policy not strong enough as it doesn't identify how much buffer zones should be. There is no DM policy for the canal corridor. |
| DPD Consulting Group for Newbury Community Football Group | Supports the commitment to protecting and enhancing existing Green Infrastructure assets. Also supports the inclusion of amenity green space, such as outdoor sports facilities, as green infrastructure assets. However, it is noted that Natural England's (NE) Green Infrastructure Framework (which was emerging at the time, but has now been released) was referenced within the policy's supporting text. The Proposed Local Plan should provide further clarity on how the NE Framework has informed the policy. |
| Cllr Alan Macro | Support policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---------------------------------------|--|
| Southern Planning for Saunders Family | Key benefit of Land East of Stoney Lane, is the provision and strengthening of Green Infrastructure in the area. |

| | |
|---|---|
| Boyer for <ul style="list-style-type: none"> • Sovereign • Darcliffe Homes | Suggested amendment for clarification to paragraph regarding loss of green or blue spaces, adding <u>at the time of the determination of any planning application</u> plus additional text to end of paragraph. |
| Savills UK for the Englefield Estate | Further clarification is required to specify land which is GI and subject to this policy. Should be made clear that GI excludes for example open countryside, agricultural land and garden land, in line with the NPPF. |
| Barton Willmore, now Stantec for Yattendon Estate | We are fully supportive of this Policy, and we consider that it is line with Section 15 of the NPPF |
| Opus Works for <ul style="list-style-type: none"> • Bewley Homes & Calcot Park Golf Club • Chartfield Homes and Newbury and Crookham Golf Club. | Policy SP10 – Green Infrastructure is supported. |
| Planview Planning for Leibreich Associates | The policy is vague and open to interpretation and doesn't encourage proposals to provide GI over and above the baseline. This is a missed opportunity. Suggested wording provided. |

Summary of issues raised:

General support for policy with some suggested wording amendments for clarification.

Main issues include:

- Lacks recognition of the need to link into identified green links or corridors within adjoining areas.
- Suggest that the title is changed to - Blue Green infrastructure.
- Lack of reference to formal sport facilities and playing fields. There should be a policy referring the playing pitch strategy and the need to enhance and provide playing fields (Sport England).
- A separate policy on Public Rights of Way suggested
- Opportunities have been missed due to lack of GI strategy, categorisation and mapping by typology.
- Further clarity suggested on how Natural England's Green Infrastructure Framework has informed the policy.
- Support for retention of the football ground for community sport use and as a key green infrastructure asset.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: SP11 Biodiversity and geodiversity**

Number of representations received: 23

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---|---|
| Hermitage Parish Council | Suggest point a) be reworded to: 'status of the site <u>and</u> species' as both factors will come into play. |
| Royal Borough of Windsor and Maidenhead | Pleased to see the West Berkshire Local Plan Review includes a policy that new development will achieve 10% Biodiversity Net Gain |
| Stratfield Mortimer Parish Council | 10% minimum net gain is impractical for every single planning application, e.g. householder extensions etc. If every application is included in the requirement there are unlikely to be sufficient ecologists available to produce such surveys/assessments. |
| Environment Agency | <p>Currently the policy does not satisfactorily adhere to the requirements of NPPF section 15.</p> <p>There is no inclusion on the size of the buffer zone. The use of 'appropriate' as stated is ambiguous and could end up with a buffer which is not sufficient. Some watercourses require even be more than a 10m buffer provided at either size of the watercourse due to the importance of the designated rivers in West Berkshire, the River Kennet SSSI and River Lambourn SAC. As well, habitats of principle importance also need a buffer zone, not just designated sites.</p> <p>Suggested amendment to policy text point 'd' supplied</p> <p>A standalone policy specifically about the water environment to provide more protection for the water environment is required. This is particularly important given the nationally and internationally protected sites that includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats within the Kennet floodplain.</p> <p>Refer to nearby local authorities which have specific wording protecting water bodies</p> |

General Consultation Bodies:

| Consultee | Main issues |
|-------------------------------|---|
| North Wessex Downs AONB | Supportive. The AONB would encourage a higher minimum net gain for areas in the AONB given the unique habitats in this chalk landscape and there sensitivity to change. The AONB would encourage a 20% net gain. |
| BBOWT | <p>Welcome policy on biodiversity and geodiversity including net gain requirement.</p> <p>Suggest policy includes all rivers and stream corridors.</p> <p>BBOWT supports and encourages the adoption of a 20% minimum net gain policy including within West Berkshire.</p> <p>Do not condone the loss of any irreplaceable habitats – mitigation or compensation is never fully adequate.</p> <p>Criterion q – concerned commensurate could be interpreted as the same area, contrary to what is widely accepted as compensation for irreplaceable habitats, where much more replacement habitat is required to even begin to compensate for the loss. Alternative wording should be used to make it clear that commensurate does not just equal the ‘same amount’.</p> |
| Berkshire Ornithological Club | <p>Does not comply with NPPF 174 by not fully protecting biodiversity</p> <p>Does not comply with NPPF 179 by not having a policy to promote the identification of Local Wildlife Sites or provide protection for sites of ecological importance that have not yet been formally protected or designated.</p> <p>Does not comply with NPPF 180 as it does not make clear that proposals adversely affecting biodiversity and loss is not prevented on-site or by other mitigation will be refused.</p> <p>For applications affecting designated sites – there is no requirement that the feature for which the site is designated will be the main consideration of any necessary mitigation. If mitigation does not address the qualifying feature, the application should be refused.</p> <p>There has not been an adequate review of Local Wildlife sites, and sites that would qualify are not adequately protected. The formulation of a Local Nature Recovery Strategy is in progress, and until then there will be gaps in policy protection. Unless policies are in place to address these gaps, the plan will not comply with the NPPF.</p> <p>Several suggested amendments to the policy to address these concerns.</p> |
| Woodland Trust | Policy complies with NPPF requirements. Policy and supporting text is supported. |

Other Stakeholders:

| Consultee | Main issues |
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| Liberal Democrat Group | The use of the word “will” where it is intended to refer to the placing of a constraint on development should be replaced by “must”. |
| Bio Cap | Policy focuses on on-site provision for net gain but off-site provision often results in better outcomes. To comply with national policy, the policy should allow for off-site net gain. Alternative policy wording provided. |
| SayNoToSandleford | SP 11 appears to be in direct conflict with the NPPF 180 c, especially regarding what defines "exceptional" circumstances. The threshold of “wholly exceptional” does not apply to a local housing development. |
| Various individuals/ local residents | <p>Policy is in direct conflict with NPPF 180c. re. irreplaceable habitats, particularly with regard to the exceptions of this clause. The footnote guidance in 180c infers that exceptional circumstances include nationally important infrastructure such as HS2. Local housing estates are not nationally important, and if they were ANY ancient woodland would fail to be protected.</p> <p>Little within the evidence base to suggest this has been a priority in the LPR work.</p> <p>Public aren’t allowed to view ecological reports which inhibits the work of various mammal societies.</p> <p>Relocation of species on sites is not monitored.</p> <p>The ecologist is buried within the planning department rather than taking a strategic role within the organisation.</p> <p>Despite the Climate Emergency declaration there has been little work on nature recovery or protection of local wildlife corridors.</p> <p>Coley Farm and Sims metal yard are examples of unallocated sites where the opportunity to promote green corridors has been lost.</p> <p>The council only considers the needs of people rather than the wider environment</p> <p>There are much better examples of similar policies in other plans.</p> |
| Cllr Alan Macro | Support policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Ridgepoint Homes | <p>Support the requirement to deliver Biodiversity Net gain.</p> <p>Net gain will be imposed under the Environment Act which is not yet in force. Suggest it is amended to refer to delivering ‘net gain in accordance with the Environment Act 2021.</p> |

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| | The supporting text indicates that householder and minor applications would need to be supported by a Preliminary Ecological Appraisal which could render them unviable. Suggest amended to require a PEA via planning condition if the site is considered ecologically sensitive. |
| ET Planning for Messers. Marriage | The plan could go further in supporting biodiversity by allocating specific sites for biodiversity net gain. |
| Pegasus Group for Donnington New Homes | Supports the principles. However reference within the policy to the requirement for '10% Biodiversity Net Gain' is currently unlawful. Policy SP11 should be amended to reflect the relevant, national requirement for Biodiversity Net Gain in force at the time an application is considered. |
| Boyer for <ul style="list-style-type: none"> • Sovereign • Darcliffe Homes | To future-proof the policy, it is recommended that additional wording is included to provide for greater flexibility in the use of an appropriate metric to measure Biodiversity Net Gains |
| Thakeham Homes | Supportive of the Council's requirement for all proposals to demonstrate a minimum of 10% biodiversity net gain, within the development at the first instance, or via off setting where not viable. |
| Opus Works for <ul style="list-style-type: none"> • Bewley Homes PLC and Calcot Park Golf Club • Chartfield Homes and Newbury and Crookham Golf Club. | Policy SP11 – Biodiversity and Geodiversity is supported |

Summary of issues raised:

There is a good level of support for the policy with some suggested wording changes for clarification.

Main issues identified include:

- A standalone policy specifically about the water environment is required; important given the nationally and internationally protected sites that includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats within the Kennet floodplain (Environment Agency).
- Policy does not indicate size of the buffer zone
- Policy SP11 should be amended to reflect the relevant, national requirement for Biodiversity Net Gain in force at the time an application is considered.

- Supporting text indicates that householder and minor applications would need to be supported by a Preliminary Ecological Appraisal which could render them unviable. 10% minimum net gain is impractical for every single planning application
- Support for the adoption of a 20% minimum net gain policy by BBOWT and, within the AONB, by the AONB.
- To comply with national policy, the policy should allow for off-site net gain
- Does not comply with NPPF 174 by not fully protecting biodiversity, NPPF 179 by not having a policy to promote the identification of Local Wildlife Sites and NPPF 180 as does not make clear that proposals adversely affecting biodiversity and loss if not prevented on-site or by other mitigation will be refused.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP12 Approach to Housing Delivery

Number of representations received: 67

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
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| Basingstoke and Deane Council | Does not anticipate there being any unmet needs arising from Basingstoke and Deane borough that would need to be met by West Berkshire Council. |
| Bracknell Forest Council | Assume LPR is meeting full general housing need in West Berks, with no unmet need. Not stated how West Berks is intending to address their share of meeting Reading's unmet need as per the MoU with Bracknell Forest, Reading and Wokingham. The Bracknell Forest Local Plan Main Modifications includes an approach to this. Reading's expressed preference is for the need to be met as close as possible to where the need arises, therefore West Berks being adjacent to Reading should address this matter in the LPR. To not do so is unsound and causes implications for the DtC. Request further consideration is given to this matter. |
| Wokingham Borough Council (WBC) | Though not considered a soundness issue, WBC request the Plan is updated to confirm that it contains a buffer to contribute to Reading's unmet housing need if required, consistent with the approach taken in the Bracknell Forest Local Plan main modifications and the Inspectors' initial recommendations. WBC acknowledges that the Plan approach to windfall development is cautious in excluding an allowance from medium and large sites despite past trend data. This cautious approach is considered reasonable. The Plan sets out a strategy which is capable of exceeding housing needs in accordance with national policy and which is not considered to give rise to significant cross boundary implications for Wokingham Borough. WBC considers that the Duty to Co-operate has been met in this regard. |
| Royal Borough of Windsor & Maidenhead | RBWM welcomes the intention of West Berkshire to accommodate its housing need in full and support the inclusion of a buffer to allow for delays and non-implementation that may occur. |
| Slough Borough Council | We support the proposal for West Berkshire to meet its identified housing requirement in full within the district. Slough Borough Council is not in the same housing market area as West Berkshire, is unable to meet its housing need in full |

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| | and is cooperating with a neighbouring authority. Should West Berkshire reduce its housing land provision this would potentially increase the unmet needs that will need to be accommodated and could exacerbate development pressures across the sub-region. |
| Reading Borough Council (RBC) | There is flexibility to deliver housing over and above local housing need. RBC therefore supports the policy. This plan does not specifically make any allowance for meeting Reading's unmet needs, but we recognise that the flexibility inherent in the dwelling range expressed, in combination with the plans of other authorities, will enable these unmet needs to be met. This matter will however need to be revisited as part of RBC's Local Plan Review, due to commence in 2023, given that the standard methodology would significantly increase Reading's housing need. The matter of unmet housing need will therefore need to be revisited in a future Local Plan review. |
| Newbury Town Council | The Brownfield Register and allowances for windfall sites around Newbury significantly understated, increasing the allocation of greenfield sites, contrary to guidance and policy in the NPPF. Estimated that there was a shortfall in the region of 500 dwellings including the LRIE site, the lands adjacent to Bayer, the Kennet Centre redevelopment, Mayfield Point, the Magistrates Court and the Phoenix Centre. Requests that the site allocations in the Newbury Settlement Area be reviewed. |
| Thatcham Town Council | NE Thatcham allocation has been advertised in the press releases as for 1,500 homes. However, the LPR (6.12 & 6.13) suggests up to 2,500 homes. SP17 states approximately 1,500 dwellings. Thatcham strategic growth study has not been updated since the reduction in allocated numbers, and SP17 refers to the 'guiding principles' of the study, which could be interpreted to mean 2,500 homes. If an application came in for 2,500 dwellings, it would be based on insufficient infrastructure as identified for 1,500 homes. SP17 is ambiguous on the final number of homes for NE Thatcham, in conflict with the NPPF. |
| Tilehurst Parish Council | Good to see plan delivers anticipated need, and no further development outside of settlement boundaries is necessary. Support windfall sites of 10 units or more not being included in the calculation of windfall supply. |
| Tilehurst NDP Group | As for Tilehurst Parish Council |
| Bucklebury Parish Council | The direction of national policy travel is for housing need to be plan-led, and may reduce significantly from the current proposed figure. Current 513 figure is based on outdated ONS projections and a flawed methodology. Other local authorities have chosen to pause progress of their plans in light of the potential forthcoming changes to national policy and changes to housing need calculations. WBC should do the same. Recent over-supply of housing would, under the new system mean that NPPF 11b(iii) (new version) could be engaged and render large scale release of sites such as NE Thatcham unnecessary. |

General Consultation Bodies:

| Consultee | Main issues |
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| Campaign to Protect Rural England (CPRE) | The housing numbers can be significantly reduced, as they are no longer binding, but 'advisory' due to the recent policy changes. |
| North Wessex Downs AONB | The AONB does not consider it appropriate to take some of the unmet need from a neighbouring authority given the existing constraints of the District. |
| Home Builders Federation | <p>Does not provide the necessary clarity required of a policy as set out in paragraph 16 of the NPPF as well as failing to take account of the unmet needs of a neighbouring area as required by paragraphs 11 and 61 of the NPPF.</p> <p>Use of range: Consider the use of a range to be inconsistent with the NPPF. It does not provide the necessary clarity, as to the Council's annual housing requirement against which delivery will be measured. It could also create confusion as to the application of the 5% buffer required, as set out in paragraph 74 of the NPPF. Council needs to be clear in policy what the minimum requirement is and what will be supplied, including any buffer.</p> <p>Unmet housing needs: No mention is made as to how this unmet need will be met within the statement of common ground. It should have been included either wholly or in part within the Council's housing requirement.</p> <p>Affordable housing: The Council's evidence indicates that there is a need for at least 330 affordable and social rented homes per annum. Given that the principle mechanism for the delivery of affordable homes is through the allocation of market housing there is justification for adopting a higher housing requirement.</p> <p>Housing Supply:</p> <p>There is very limited flexibility in supply and no certainty that needs will be met over the plan period. The ability to demonstrate this will be at risk from changes in delivery rates on any sites that deliver towards the end of the plan period. A more substantial buffer in overall supply would provide greater certainty that the plan is deliverable over the plan period. HBF would recommend that a buffer of at least 15% is included.</p> <p>Also concerned that the five-year land supply on adoption in 2024/25 is marginal against either the upper or lower range. Therefore it will be important for the Council to revisit its land supply and seek to include more small and medium sized sites that will deliver earlier in the plan period. This would also help to ensure that at least 10% of the housing requirement is delivered on identified sites of less than one hectare. At present it is not clear that this requirement in paragraph 69 of the NPPF has been achieved.</p> <p><i>Windfall:</i> Would suggest that rather than rely on this level of windfall the Council seeks to allocate more small sites. The proactive identification and allocation of such sites is a key part of plan making that was included in the NPPF to provide more support to SME house builders. HBF is concerned that this may well be a declining source of supply and would recommend that a 20% reduction is made to reflect the lack of certainty. Agree with the Council's decision not to include larger and medium sized sites as part of any windfall allowance. There is no certainty as to the when or if these types of sites will come forward.</p> |

Other Stakeholders:

| Consultee | Main issues |
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| West Berkshire Green Party | The area's need has not been 'objectively assessed' and the target is an arbitrary figure. The government has now abandoned its own guidelines, which hasn't been taken into account. |
| Liberal Democrat Group | <p>If "achieving sustainable development" requires a Plan to provide new housing as far as possible within settlements and on previously developed land, then the allocation of 2,500 homes in North East Thatcham (SP17), of which a minimum of 1,250 are to be delivered by 2039, shows the Plan is not Positively Prepared.</p> <p>Windfall: the extremely modest figure seemingly based on an outdated definition of windfall demonstrates that this policy is not consistent with national policy. By only taking account of small windfall sites, despite there being several large and medium sites within settlements with planning consent and featuring in the Register of Brownfield Land, the Policy's supporting text (6.19) takes far too cautious an approach to contribution of windfall to housing supply.</p> <p>Believe there is evidence that at least 500 of the 1,250 homes allocated in this Plan period for NET could be instead more sustainably be located within settlements, mainly on two large sites in Newbury. We can see no justification for asserting there is no need for a significant windfall allowance from medium/large sites that are known to the LPA if such sites are included in the Five Year Land Supply. Small windfall sites have only accounted for about one third of the total actual windfall numbers over the current Plan period, so will almost certainly not deliver most of the windfall in future. We would expect more NDPs to be declared by parishes across the District and for these to produce a significant number of housing sites. We estimate that the combination of these and medium/large windfall could amount to at least 200 additional homes per year within, adjacent to or near settlement areas.</p> <p>Suggested amendments to supporting text supplied.</p> |
| Various individuals/ local residents | <p>Para 6.19 – NPPF reference to paragraph 68 is not correct, it should be to NPPF 69(c). However NPPF 69(c) does not suggest that windfall sites should be exclusively within existing settlements.</p> <p>There is no mention of formal boundaries to settlements within the NPPF, which suggests flexibility towards sites other sites, for instance, adjacent to a settlement which NPPF 72(b) expressly suggests.</p> <p>SP12 is particularly restrictive and does not meet the requirements for development provided for in the NPPF, due to the heavy reliance of locations for development specified as being with a settlement boundary.</p> <p>Updated guidance due to be published and anticipated that government's required number of houses will be reduced.</p> <p>The numbers of houses being built should be reconsidered in light of revised guidance</p> <p>Lack of detailed and transparent evidence on numbers and types of housing needed.</p> <p>The capacity of smaller developments, brownfield sites, unbuilt planning permissions, and utility of other areas should all be quantified.</p> <p>Brownfield sites should be used first and not just built to make up government target numbers.</p> |

| Consultee | Main issues |
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| | <p>NE Thatcham allocation has been advertised in the press releases as for 1,500 homes. However, the LPR (6.12 & 6.13) suggests up to 2,500 homes. SP17 states approximately 1,500 dwellings.</p> <p>Thatcham strategic growth study has not been updated since the reduction in allocated numbers, and SP17 refers to the 'guiding principles' of the study, which could be interpreted to mean 2,500 homes.</p> <p>If an application came in for 2,500 dwellings, it would be based on insufficient infrastructure as identified for 1,500 homes. SP17 is ambiguous on the final number of homes for NE Thatcham, in conflict with the NPPF.</p> <p>Cut off for 10 units for windfall sites is arbitrary, rather than being based on proportionate evidence for each site.</p> <p>The 10 unit cut off also appears to be being used to exclude sites from the brownfield register and as non-strategic sites, artificially reducing the availability of future supply and inflate the estimated requirement.</p> <p>This skews development away from brownfield sites, into greenfield areas, contrary to the NPPF.</p> <p>Given that only a small percentage of land in West Berkshire is free of planning restrictions, expansion unfair on the residents of Newbury and Thatcham. The plan will become sound if the amount of development is proportional to the ratio of land available for development compared to the overall area of the district.</p> <p>Want to see clear figures for the Newbury settlement set out in a Table – example provided.</p> <p>Housing need figure should be advisory</p> <p>Windfall: The availability of larger sites will vary. The cut-off of 10 units is arbitrary, and not based on proportionate evidence for each site. It also appears to exclude such sites from inclusion in the brownfield register, or from being included in the Local Plan as a non-strategic policy. This approach will artificially reduce the estimation of the contribution that will be made from previously-developed or 'brownfield' land, and therefore artificially inflate the estimated requirement for homes on developments on greenfield sites.</p> <p>One site that appears to have suffered from this approach is THA21; Newbury Leisure Park, Lower Way, Thatcham.</p> |
| Cllr Alan Macro | <p>Windfall allowance: threshold should be site area of one hectare, with allowance for those already with planning permission (as the LPR does with sites of less than ten units) to increase the windfall allowance.</p> <p>Greenfield housing site allocations should then either be reduced in size or removed altogether to compensate</p> <p>Sites within settlement boundaries: None have been allocated. Examples include the Kennet Centre where planning applications have been submitted for hundreds of units and the London Road Industrial Estate in Newbury where WBC, who own the site, have put forward re-development schemes that include converting part of the site to housing. Sites in the Brownfield Land Register or subject to suitable major planning applications should be evaluated and if appropriate included in the target housing total.</p> <p>Paragraphs 6.25 – 6.27: The Secretary of State's Written Statement of 6th December 2022 removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans. Paragraphs should be removed.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Southern Planning Practice for Saunders Family | <p>The LHN @ 513 dwellings per annum has not changed since Reg. 18. This is hard to believe due to the passage of time and current housing crisis.</p> <p>The LHN should be tested at examination and due regard should be given to the standard method as well as the Duty to Cooperate.</p> <p>Strongly object to the reduction in homes to be delivered over the Plan period. Acknowledge that the target does not represent a cap or a ceiling but the policy should be worded to make it clear the requirement is a minimum in accordance with NPPF 11b.</p> <p>6.23 – the number of dwellings per annum has reduced, but the overall number of dwellings has increased. 6.28 sets out that the 5 year housing land supply has decreased as well. Such a dramatic fall in supply suggests that further developments should be allocated to bolster the supply.</p> |
| Fisher German LLP for Mr Musgrave and Mr Begley | <p>Evidence suggests housing requirement should be higher to ensure growth ambitions can be realised. Not demonstrated that delivery of only 513 dpa will be sufficient to meet household formation rates. High affordable housing need, particularly in AONB suggests that it would be proportionate to uplift housing need.</p> <p>Proposed buffer of 5% is likely to be insufficient - consider 10% more appropriate.</p> <p>Significant reliance on extant allocations and not clear if these are deliverable.</p> <p>Concern on windfall assumptions, needs clear and compelling evidence that there remains enough suitable land.</p> <p>Windfall may be harmful to settlement character. Methodology not justified and rate of windfall delivery should be reduced.</p> |
| Rectory Homes | <p>Contrary to paragraphs 11, 16, 61 and 69 of NPPF and therefore unsound.</p> <p>Housing requirement should be presented as single figure so that minimum requirement is clear.</p> <p>To ensure Reading's unmet need is met, the Council and Wokingham Borough Council should provide a memorandum of understanding to deliver these homes.</p> <p>Based on trajectory, housing supply will be marginal upon expected adoption. Clear that larger buffer needed to account for any unforeseen delays to housing delivery.</p> <p>Para 69 of NPPF says should identify land to accommodate at least 10% of requirement on sites no larger than 1 hectare. Concerned, as a SME, that reliance on windfall sites to meet requirement is not reliable source of delivery.</p> <p>Recommendation that more small and medium sites be allocated.</p> <p>To meet 15 year period from adoption suggest plan period extended by further year.</p> |
| Lichfields for "the Partnership," a Partnership comprising A2Dominion, Catesby | <p>We support the plan's positive approach to increase housing delivery through the Plan Period.</p> |

| Consultee | Main issues |
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| Estates, Donnington New Homes and Ptarmigan Land. | |
| <p>Pro Vision for</p> <ol style="list-style-type: none"> 1. Newbury Racecourse Plc. 2. Rivar Ltd. 3. The Trustees of the Allan Snook Will Trust 4. CALA Homes 5. Mr and Mrs Pittard 6. T A Fisher & Sons Ltd. | <p>It is considered that the level of housing currently proposed is:</p> <ul style="list-style-type: none"> • insufficient to support the Government’s objective of significantly boosting the supply of housing; • significantly below the Council’s aspirations to achieve and address the affordability problem / affordable housing need within West Berkshire; • does not take account of potential unmet need from neighbouring authorities (particularly from Reading) given the changes in local housing needs; and • The buffer is too low, given the level of constraint and variables in the district that affect delivery of new homes, and taking account of the level of available sites in identified in the HELAA. <p>Considered that housing target should be increased to between 564 - 616 dpa (i.e. a 10-20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039.</p> <p>Also concern that the Council’s expected housing supply is not sufficient to meet the minimum LHN and will lead to a significant housing shortfall across the plan period.</p> <p>Meeting housing need: consider existing allocations with no or only outline permission and non-allocated permissions should apply a 10% non-implementation rate.</p> <p>Recommend that Council remove or significantly reduce windfall allowance and take forward more of available sites from the HELAA.</p> <p>Trajectory is unrealistic and considered that currently the Council’s housing supply is not sufficient to meet the minimum LHN. Question unrealistic assumed delivery rate on Sandford site and the North East Thatcham site, along with questions regarding the evidence base for allocation. The LPR should be allocating more sites for housing over the plan period consistent with the broad spatial strategy; many available sites in the HELAA have been overlooked.</p> |
| Neame Sutton for Donnington New Homes | <p>Number of shortcomings with reference to housing provision:</p> <ul style="list-style-type: none"> • An insufficient buffer to allow for flexibility and to ensure that the local housing need (LHN) is met in full over the Plan period. • A larger buffer could be provided with no additional negative affects against the Sustainability Appraisal objectives and would provide additional positive benefits. • The current unmet need of Reading is not adequately provided for. • The likely future unmet need of Reading should be planned for now, and the Submission Plan should include flexibility to provide for that need as part of the Duty to Co-operate. • There is a clear case for an uplift to the housing provision to account for the identified affordable housing need of the area. |

| Consultee | Main issues |
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| | <ul style="list-style-type: none"> • The reliance on a single, large strategic site for the delivery of most of the residual housing requirement, emphasises the need for a sufficient buffer to offset the potential under-delivery of the Plan. • A potential shortfall in the five-year housing land supply from the intended date of adoption of the Plan. |
| Pegasus Group for Donnington New Homes | <p>Representations re Sandford Park West:</p> <p>Target for delivery at Sandford Park is considered to be a robust prediction. There is, however, conflict with Policy SP13, which identifies a figure of only 1,500, 80 units less than SP12. The figure contained in Policy SP12 is the correct figure to include within the submission plan.</p> |
| Pegasus Group for Donnington New Homes | <p>Representations re Sandford Park South:</p> <p>Analysis highlights shortcomings in respect of housing provision:</p> <ol style="list-style-type: none"> a) an insufficient buffer to allow for flexibility and ensure the LHN is met in full over the Plan period, b) a higher housing requirement by increasing the buffer can be made with no additional negative affects against the Sustainability Appraisal objectives, and indeed would provide additional positive benefits, c) the current unmet needs of Reading are not adequately provided for, d) the likely future unmet needs of Reading should be planned for now, and the LPR should include flexibility to allow for the provision of that need as part of the Duty to Co-operate, e) there is a clear case for an uplift to the housing provision to account for the identified affordable housing needs of the area, and f) a potential shortfall in the five year housing land supply from the intended date of adoption of the plan if the oversupply is not accounted for in the five years following adoption |
| Boyer Planning for Sovereign Housing Association | <p>Support the Council's use of the Government's Standard Method to derive housing target. The identification of an appropriate housing target that is approximately 5% above the LHN minimum figure is considered to be sufficiently robust. Sovereign supports the Council's identification of additional headroom within the identified supply, which could be partially utilised to accommodate an appropriate proportion of the unmet need arising from Reading borough throughout the plan period.</p> <p>Sovereign supports the Council's commitment to allocate sufficient small and medium sized sites to maintain housing delivery throughout the plan period.</p> <p>Currently formulated, the proposed policy limits the exception to the net loss of residential units to situations in which there is a change of use. There are situations in which the public benefit of a net loss of residential units could be justified without a change of use occurring and amendment to policy recommended to remove reference to change of use.</p> |
| Gladman Developments | <p>Not clear whether the lower end or the higher end of the requirement would be used for the purposes of future five-year housing land supply calculations. The use of a range is inherently unclear and ambiguous and is in direct conflict with the NPPF Para 16.</p> |

| Consultee | Main issues |
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| | <p>Serious concerns that progressing the proposed housing requirement will further exacerbate the significant shortage of affordable homes within West Berkshire and urge WBC to consider an uplift to ensure greater number of affordable housing is delivered.</p> <p>Concern over the deliverability of the sites. Many of allocations have been allocated for six years and have not yet come forward. Consider that an additional supply flexibility of 15% above the housing requirement should be identified to safeguard against the non-implementation and delivery of housing proposals</p> |
| Turley Associates for Pangbourne College | Plan does not allocate sufficient housing to meet the need, instead leaving some to be delivered through Neighbourhood Plans. No current neighbourhood plans are proposing to allocate new housing sites, so this approach doesn't provide the required certainty and the plan is unsound. |
| Carter Planning Limited for Mr R L A Jones | <p>Overall housing requirement unlikely to be adequate as no final information on the housing requirement likely to have to be met from adjoining Boroughs such as Reading, Wokingham or Swindon through the Duty to Cooperate etc and where this would be located. Secondly, the Government's new mechanism for housing need calculation is likely to result in a higher figure.</p> <p>Table 2. This Table has deleted "Allocations without permission" and instead increased the windfalls. To have a quarter of the sites as uncertain windfalls (1,949 of 7,337), apparently some 74% of the total, is wholly unacceptable and does not supply the certainty required.</p> <p>Para. 6.23 No explanation is given as to why this figure of 80 to be allocated in NDPs has reduced from the 315 in the Reg 19 Plan. The Council should allocate all housing sites through this Draft LPR and not leave the task to Neighbourhood Plans</p> |
| Barton Willmore, now Stantec for The Sulham Estate | <p>The accompanying Technical Note to the representation concludes that the rate of affordable housing delivery needs to increase from the existing rate and there is a need to provide up to 10,406 affordable dwellings to ensure that needs are met. To ensure that more affordable homes are delivered, the Council should increase their housing target and allocate further sites for development.</p> <p>Concern with regard to delivery on large sites and consider there is a need for further small/medium sized sites with further allocations to meet the need for an increased housing target.</p> |
| Savills UK obo the Englefield Estate | There is a current shortfall in delivery against the Core Strategy housing requirement, a pressing need for affordable housing and unmet need identified by Reading Borough Council, which is likely to increase further given that the standard method now applies a 35% uplift. Recommended that the housing target is increased to include additional provision above the minimum LHN plus 5% |
| Iver Consulting Ltd for Prosper Infinity Ltd | Brownfield sites have been failed to be reviewed, and should be brought forward prior to the release of greenfield sites in Thatcham |
| WSP for Mr Charlie Parker | Given Lambourn's relative size compared to the other two Rural Services Centres in the AONB, and the unique requirements to provide housing for the racehorse training industry, the number of houses identified in the village is disproportionately low. |

| Consultee | Main issues |
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| Boyer for Darcliffes Homes | <p>Darcliffe supports the Council's use of the Government's Standard Method to derive a minimum housing need figure for the District area. However PPG clarifies there are various circumstances in which it may be appropriate to plan for a higher number of homes</p> <p>Range: The expression of the housing requirement as a range is considered to introduce unnecessary confusion and is considered to be inconsistent with the NPPF. Introduces uncertainty in relation to how the 5% buffer would be applied in considering the Council's Five-Year Housing Land Supply position ('5YHLS'). Recommends the Council seeks to identify a single housing requirement figure, which reflects the LHN figure, plus an appropriate buffer.</p> <p>Buffer: The provision of just a 5% buffer over the LHN figure is insufficient to effectively ensure that the District's minimum local housing needs will be delivered and consider a buffer of at least 10% above LHN.</p> <p>Affordable housing: Clear case for accommodating further residential development, as far as is reasonably practicable, to promote the delivery of greater affordable housing.</p> <p>Unmet need - Given the relatively modest level of unmet need, Darcliffe expect that an appropriate contribution should be accommodated within West Berkshire toward meeting some, if not all, of Reading's unmet need. Reading is substantively reliant on brownfield sites which lend themselves to flatted development. Tilehurst essentially forms a functional suburb of Greater Reading, and could pick up the unmet need for RBC's family homes. Darcliffe recommends including a specified commitment toward meeting at least the existing identified unmet needs of Reading Borough within the housing requirement figure under Policy SP12, and that the Council seeks to identify opportunities to deliver it within locations that are functionally linked to the area in which the unmet need arises.</p> <p>Currently formulated, the proposed policy limits the exception to the net loss of residential units to situations in which there is a change of use. There are situations in which the public benefit of a net loss of residential units could be justified without a change of use occurring and amendment to policy recommended to remove reference to change of use.</p> |
| Thakeham Homes | <p>Of concern that despite the fact that the Core Strategy and Site Allocations DPD were adopted in 2011 and 2017 respectively, that there are still 2,652 outstanding units, which represents over 50% of the total homes allocated. This brings into doubt the deliverability of these allocations and further work should be undertaken to ensure that there is realistic chance of them coming forward. If any doubt, then they should not be considered 'available', and alternative sites need to be included.</p> <p>Concerned that the housing target figures, have dropped since the previous Plan consultation. This is of concern, particularly when existing housing allocations are appearing slow to build-out, and villages such as Lambourn are also considered to be allocated less housing than is required.</p> <p>Thakeham does not consider a range to be consistent with the NPPF. There needs to be a higher provision of housing, which can in turn deliver higher percentages of affordable housing.</p> |

| Consultee | Main issues |
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| | <p>Supply leaves 9 dwellings unaccounted for, with no flexibility given for phasing issues or non-delivery. Thakeham does not consider relying on delivery of windfall sites to make up the remainder of housing need and provide a suitable buffer to be a sensible approach, particularly in a local authority that is heavily constrained by the AONB.</p> <p>The Council should seek to allocate more smaller sites, as advocated by paragraph 69 of the NPPF.</p> |
| Gleeson Land | <p>The Council's use of a range is not specific or clear. A range could result in time wasted in future planning determinations or appeals, debating which end of the range should be used when calculating the Council's five year housing land supply and in calculating housing delivery against the target. Considered that the housing target should be set at the upper figure of 9,146 dwellings or 538 dwellings per annum.</p> <p>Re. Reading's unmet need, there is no reason to delay meeting this and it should be included in the Council's housing requirement and sites allocated now to meet this identified need.</p> <p>Evidence indicates affordable need will not be met. Accordingly the Council should increase the overall housing target so that the delivery of affordable homes also rises.</p> |
| Bell Cornwell LLP for Hathor Property Limited | <p>Proposed spatial strategy recognises there is a need to allocate greenfield sites, and that housing need cannot be met on brownfield sites alone. We agree this is realistic. However, there is some doubt that the LPR allocates a sufficient number of sites to ensure sufficient housing delivery in the initial 5 year period from adoption. In order to deliver a more robust land supply position, we submit there the Council should revisit its land supply assessment and seek to include additional small/ medium sites.</p> |
| Turley for Hathor Property | <p>The provision of a range is misleading and confusing.</p> <p>The current standard method calculation requires provision of a minimum of 513 dwellings in the plan period and para 74 of the NPPF requires an additional 5% buffer. This equates to 538.65 dwellings, should be rounded up to 539 dwellings.</p> <p>There is justification for adopting a higher housing requirement to increase delivery of affordable homes and a related identification of additional housing sites in suitable locations.</p> <p>There is currently an over- reliance on sites that have not delivered and are therefore retained allocations from the current Core Strategy, or large strategic sites where delivery is likely to be slow. In order to provide a more robust five-year land supply in the early years of the LPR it will be important for the Council to revisit its land supply and seek to include more small and medium sized sites that will deliver earlier</p> |
| Turley for Donnington New Homes | <p>Existing allocations: question why some are retained as allocations, rather than commitments, given their planning status.</p> <p>Windfall: apparent from the limited brownfield site availability that in order to reach the windfall allowance of 140 dpa each and every year over the plan period will be challenging. No guarantee that existing commitments on windfall sites will be built out. The absence of evidence setting out the status of these PD conversion and other windfalls is concerning. Council must be able to demonstrate delivery of ALL of these homes, as there is no buffer built into the Plan to accommodate non delivery.</p> |

| Consultee | Main issues |
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| | <p>Over-reliance on the two strategic sites coming forward, one of which (Sandleford Park) has been slower to come forward than anticipated in the previous plan period.</p> <p>In order to ensure an ongoing sufficient supply of land, further sites should be allocated for development.</p> |
| <p>Opus Works for:</p> <ul style="list-style-type: none"> • Bewley Homes PLC & Calcot Park Golf Club • Chartfield Homes & Newbury & Crookham Golf Club. | <p>Policy SP12 and Paragraph 6.12 – Approach to Housing Delivery is supported. The text should not be amended to remove reference to the delivery of housing over and above the “target figure” of 538 dwellings per annum. It is important to make it clear that the current shortfall of 1,809 dwellings should also be a minimum and not a ceiling or a cap to development.</p> <p>It is likely that larger sites will have some problems with delivery and there is a real need for more medium-sized and smaller sites, of less than 100 dwellings, to be allocated to ensure that housing needs are met in the short to medium-term.</p> |
| <p>Woolf Bond Plan for Commercial Estates Group (CEG)</p> | <p>Policy is:</p> <ul style="list-style-type: none"> • not positively prepared as it does not seek to contribute sufficiently to the Government’s wider objective of significantly boosting the supply of housing; • not justified with regard to the timeframe that the examination of the Local Plan will take resulting in a delayed adoption of the document; • inconsistent with national policy in the failure to both boost housing supply and make a contribution towards addressing the housing needs of neighbouring authorities as required by paragraphs 60 and 61 of the NPPF. <p>Proposed revisions to policy SP12:</p> <p>A) ensure that the plan period is extended to March 2040; and</p> <p>B) The housing requirement is increased to a minimum of 563dpa (10,134 dwellings over the plan period) with a further uplift as a contribution towards unmet needs arising in Reading Borough.</p> <p>Presents case for refined LHN assessment using 2016 based projections, based on comparison with 2021 Census results, resulting in LHN of 563 dpa.</p> |
| <p>White Peak Planning Ltd for Bloor Homes Ltd</p> | <p>Representation re. Land South of Gorse Covert (HELAA GE2) for approximately 200 homes:</p> <p>There is scope to increase the Sandleford Park site by up to circa 200 units with the inclusion of Land to the South of Gorse Covert. Consequently, reasonable alternatives have not been properly considered.</p> <p>There is a need for clarity on the Council’s housing requirement figures. The use of a range is likely to lead to confusion and resultant decision making delays. It would be preferable if the plan was amended to incorporate an additional buffer, with the 538 figure adopted as the minimum.</p> <p>Windfalls: considered that the level of dependency on windfalls could result in insufficient development coming forward within the plan period. It would also potentially risk shortfalls in the Council’s five year housing land supply, resulting in permissions being sought on less sustainable sites. The five-year land supply on adoption in 2024/25 is estimated to be marginal at around 5.38 years.</p> |

| Consultee | Main issues |
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| White Peak Planning Ltd for Bloor Homes Ltd | Representation re Sandford Park East within proposed allocation SP16 Support. The estimated number of homes to be provided at Sandford Park reflects detailed site assessment work undertaken by Bloor Homes on its site and information in the public domain for the Sandford Park West developer. Subject to the submission and grant of planning permission for Reserve Matters, the site is realistically deliverable within the plan period. |
| Barton Willmore, now Stantec for Donnington Valley Group Ltd. | In light of the unaffordability of housing within the District, the Council should consider the wider social and economic benefits of housing provision in excess of the standard method figure. We disagree with the Council's approach of relying on larger sites, which may not be delivered within the plan period, and ruling out sites within smaller settlements and only allocating sites which fall within the service villages, rural service villages or urban areas, contrary to paragraph 79 of the NPPF. Request: <ul style="list-style-type: none"> • Reconsider the overreliance on larger sites through the allocation of more small / medium sites. • Consider the allocation of sites within lower-order settlements of the settlement hierarchy. |
| TOWN for landowners of Land East of Pincents Lane | Suggest increase in buffer to 10% High percentage from sites which are not allocated in the plan is not in accordance with national policy. These unallocated and windfall sites tend to be smaller ones which offer only lower delivery rates for affordable housing. Additional sites should be allocated, particularly in the east of WB. |
| Carter Jonas for the Trustees of the Frank Wallis Estate | Windfall: advocate that windfalls should not be included as a source of supply and should be seen as a bonus over the plan period. While there is evidence to support a small site windfall allowance, the calculation should be reduced to be more realistic. Owing to the scale of the strategic allocations, the delivery rates from these sites will not materialise until the second half of the plan period. In the absence of a buffer for the possibility that windfalls may not arise, or extant permissions are not delivered, the housing requirement will not be met. This does not represent positive planning and is therefore unsound. Concern that the authority's housing land supply will be on the cusp of five years at the time of the plan's adoption. Council should reconsider the sources of housing land supply and include more small and medium sized sites in the plan, which would assist in ensuring that the plan complies with NPPF paragraph 69 i. Provision should be made in the LPR to ensure that additional sites are planned for to meet Reading's identified unmet needs Carter Jonas would suggest that a buffer of additional sites is applied so that sufficient flexibility is included into the Plan to ensure the housing requirement and the economic aspirations can be met. Advice from the Local Plan Expert Group recommends that a buffer of allocated sites should be set to around 20%. Therefore, the Plan as drafted should include for new residential allocations for at least around 2,171 dwellings over the plan period Evident from the Housing Trajectory 2022/23 – 2038/39 (Housing Background Paper January 2023) that there is a significant shortfall anticipated in housing completions for the year 2026/27 owing to the lag for the strategic allocations |

| Consultee | Main issues |
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| | to come through. The housing trajectory suggests that both the Plan's overall housing requirement and the annual requirement, which takes into consideration past / projected completions, will not be met. Evidence of affordable housing need provides justification for a higher housing requirement. |
| LRM Planning Limited for Hallam Land Management Limited | Plan period: LPR unlikely to be adopted in 2024. Consequently, the plan period should be extended. This has the effect of increasing the amount of future development land that needs to be identified. Affordable housing needs justify higher housing requirement Extent of unmet need from Reading is likely to be significantly higher than the current 230 dwellings Delivery on strategic sites likely to be slower Spatial distribution of allocations: Table 4.2 of the Housing Background Paper illustrates that a very similar amount of new housing is proposed in the AONB in comparison with the Eastern Area. More "new" homes are allocated to AONB than the Eastern Area. The amount of new housing in the Eastern Area, and at Mortimer specifically, should be increased. |
| The Planning Bureau for McCarthy Stone | The need for specialist housing for older people forms a significant proportion of the total housing requirement and therefore the plan should be more supportive of delivering this, including having its own requirement. SP12 should be amended to include a specific provision for specialist housing for older people, to be in line with the NPPF – suggested wording provided. |
| Pro Vision for Wasing Estate | No justification given that the previous 10% housing buffer could not be accommodated within the district without harm, particularly as there are sufficient sites to accommodate further growth. The currently proposed level of housing is insufficient to support the Government's objective of significantly boosting housing supply – should be a 10-20% buffer (9,588 – 10,472 dwellings to 2039). Will provide for choice and contingency. |
| Nexus Planning for Croudace Homes | Plan period should be extended by at least one year. Requirement: 5 % buffer not sufficiently ambitious. Suggest inclusion of an additional 15% buffer. Council should seek to accommodate a proportion of Reading's unmet needs Clear case to increase the housing requirement to ensure that a greater proportion of affordable housing need, as identified within the Council's evidence base, can be met. Greater flexibility is required to ensure that the wide range of needs across the District are suitably met. Supply: There is a shortfall of 7 units in the Council's supply over the plan period to 2039 (based on 538 dpa). Croudace calls on the Council to make a more accurate, realistic and therefore 'effective' assessment of housing land supply, reducing reliance on windfall development and removing allocations which are not deliverable. Croudace question suitability of a number of sites proposed for allocation in AONB, where impacted by neutrality issues or where there are deliverability uncertainties. |

| Consultee | Main issues |
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| | <p>Questions regarding predictions in 5YHLS compared to actual completions and concern that may not be 5YHLS upon adoption. Doubts concerning the longer-term developable supply</p> <p>Significant risk to rely on substantial proportion of requirement on strategic sites and question rate of delivery. LPR should be allocating a range of additional smaller sites to provide greater flexibility and certainty.</p> <p>The LPR should allocate a sufficient quantity of smaller, deliverable sites (such as Henwick Park for development immediately). It should look to allocate a reserve supply of sites (i.e. 'Plan B' sites) if the projected housing land supply does not materialise as predicted or Alternatively, a policy allowing the development of land outside of settlement boundaries where certain circumstances arise (such as no five-year housing land supply, or constraints-based criteria are met could be considered.</p> |
| Pro Vision for Feltham Properties | <p>Concerns the proposed strategy will not deliver the priority of delivering affordable housing.</p> <p>Housing supply figures rely significantly on existing permissions and windfall development and don't allow a buffer for non-delivery.</p> <p>Recent rates of windfall are dropping below the anticipated figure over the plan period.</p> <p>The 5% buffer is too low. The constraints in the district mean the buffer should be larger.</p> <p>Delivery rates for Sandleford Park are overly ambitious.</p> <p>Vast majority (80%) of new homes are expected to be brought forward at NE Thatcham (SP17), but there are significant questions over the delivery and viability of this site.</p> <p>If NE Thatcham is intended to grow to 2,500 homes beyond the plan period, then a strategic vision is needed.</p> <p>The strategic vision in the evidence base is not mentioned in the LPR, nor subject to consultation and its status is unclear.</p> <p>Development within existing settlement boundaries have been overlooked, and there could be a greater yield from these areas. The promoted development for mixed use at land at Monks Lane, has not been considered 'within settlement' although it is within the settlement boundary and yet greenfield sites beyond the settlement boundary are being allocated.</p> |
| Knight Frank for Limes Leisure Investments | <p>Support that the housing provision does not constitute a ceiling or cap to development.</p> <p>A range of windfall sites should be considered and not just limited to small sites.</p> <p>A complete housing supply table should be prepared as Table 2 does not add up to the total housing target.</p> |

Summary of issues raised:

Housing Requirement

Neighbouring Authorities are supportive of the Council's approach of meeting local housing need in full.

A number of organisations and individuals argue that the target should be revised and could be reduced due to anticipated revised national guidance.

Some site promoters and developers are supportive of the approach and others advocate a higher housing requirement for a number of reasons:

- to ensure that economic growth ambitions can be met
- to better address affordable housing needs
- the Government's objective of significantly boosting supply
- identified and potential future unmet need from Reading
- insufficient buffer to allow flexibility
- the likely timeframe for adoption which may require additional supply

Use of a Range and Reading's Unmet Need:

Some criticisms of use of a range, arguing contrary to NPPF and lack of clarity as to requirement against which delivery measured.

Some site promoters make case for higher buffer.

Suggestion to clarify that buffer could contribute to Reading's unmet housing need if required.

Housing Supply

Buffer

Site promoters and HBF argue for more substantial buffer in overall supply to provide greater certainty of delivery

Windfall allowance

Newbury Town Council, Liberal Democrats and a number of individuals argue that the windfall allowance is too low and that there are known brownfield sites that should be included in the supply to reduce greenfield allocations.

The majority of site promoters and HBF argue that windfall allowance is too high and more small and medium sites should be allocated.

Site Allocations

Site promoters question the deliverability of existing allocations and commitments. Suggestion that should apply non-implementation rate or additional buffer.

Also concern over reliance on strategic sites where delivery may be slower than anticipated.

Delivery and Five Year Supply

Concern from site promoters and HBF that 5YHLS marginal upon adoption indicating need to allocate more small and medium sites.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham

Number of representations received: 40

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
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| Environment Agency | The site allocations presented in Chapter 8 have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document |
| Bucklebury Parish Council | The site selection background paper hasn't been published as part of the consultation. The approach of trying to make the plan 'fit' is noticeable. THA9 is contrary to the conclusions of the site selection paper regarding its contribution as a gap between settlements, and now THA9 is allocated. THA20 will also breach the strategic settlement gap between Thatcham and Newbury. The proposed development is not appropriate in the context of the existing settlement form, pattern and character of the landscape. Inconsistency of assessment on contribution to the strategic gap between THA9 & THA20 in the previous site selection background paper – THA20 should also have been assessed as providing an important contribution to the strategic gap. |
| Thatcham Town Council | Planning permission has been granted (RSA05) without requested cycle linkages and with only a single access. Policy should be amended in line with the approved scheme. |

General Consultation Bodies:

| Consultee | Main issues |
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| BBOWT | Welcome the removal of land adjoining New Road, Newbury (GRE6) as a non-strategic site allocation as it was likely to affect the nearby ancient woodland. |

Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | <p>Several sites are not allocated and therefore without a specific policy for no logical reason – NEW1 London Road Industrial Estate, Gateway Plaza, Kennet Centre/Eagle Quarter, Old Magistrates Court. Sites all susceptible to flood risk so specific policy consideration is essential.</p> <p>NEW1 and Gateway Plaza are nearly all within the NNZ for the Lambourn SAC – needs specific consideration. Area is very polluting and has been ongoing without proper environmental assessments. Needs proper allocation and policy consideration which would provide for environmental gains. The Level 2 SFRA is clear that a holistic SFRA and surface water Drainage strategy should be undertaken. Not to allocate these sites with these requirements is not acceptable.</p> <p>Some sites are already under construction and should be allocated and site policies included: Sterling Gardens Phase 2 (1st phase was fraught with unresolved issues), Shaw 401 A339, Mayfield Point (Wash Common), Sims Metal site, land adjoining the Phoenix Centre, Bayer House and land to the rear of 1-15 Northbrook street.</p> <p>Seems these sites were forgot to be allocated or were too hard, which is why they should be allocated.</p> <p>Re. exclusion of Kennet Centre: Question decision not to include sites within settlement boundary for allocation.</p> <p>Policy RSA1 should be restored to the draft Local Plan, with appropriate conditions added to ensure that the residential element is not at risk of flooding.</p> <p>The number of additional homes defined in Policy SP12 should be adjusted accordingly.</p> <p>Unclear the reasoning why sites are not to be allocated within settlement boundaries (e.g. NEW3) Site could be designed to mitigate flood risk.</p> |
| Cllr Alan Macro | <p>Allocation SP17 (NE Thatcham) is not appropriate. Comments on SP17</p> <p>Paragraph 6.28: The sentence “<i>Strategic development in Thatcham will bring considerable benefits to the town... provision of new schools, community facilities and recreational provision</i>” is not accurate as the proposed benefits would only benefit the proposed new housing, not the existing town.</p> <p>Paragraph 6.29: The sentences “<i>There is significant potential on previously developed land within settlement boundaries, particularly in Newbury town centre and periphery</i>” and “<i>sites within settlement boundaries are not being allocated</i>” are self-contradictory. The latter means that the LPR is allocating far more housing on greenfield sites than is necessary. Sites on previously developed land within settlements should be allocated where appropriate.</p> |
| Liberal Democrat Group | <p>Do not think there is a need in the Thatcham area for a site larger than 500-700 homes, due to the presence of windfall sites.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Southern Planning Practice for Saunders Family | Slightly concerning that a major strategic allocation (Sandleford) and 5 other site allocations are being carried forward. Over-reliance on Sandleford site to deliver housing and it should be removed due to advanced stage of this site in the planning process. Pleased to see Kennet Centre has been removed. |
| Fisher German LLP for Mr Musgrave and Mr Begley | Issues regarding reliance and delivery of strategic sites. Lack of justification for increase in dwellings in NE Thatcham over plan period. Additional allocations needed to ameliorate any shortfall. |
| Thames Water (as landowner) | Sites to east and west of Hill Road, Speen should be allocated. Illustrative masterplans enclosed with representation. |
| Rectory Homes | There are opportunities to provide a mix of large and small sites within settlements of Newbury and Cold Ash which would assist in compliance with paragraph 69 of NPPF |
| Pro Vision for 1. Newbury Racecourse Plc. 2. Rivar 3. CALA Homes 4. Mr and Mrs Pittard | Our assessment of the housing requirement and supply demonstrates that there is a need to allocate additional housing sites consistent with the broad spatial strategy. Council should reconsider allocation of our clients' sites at 1. Land south of Newbury Racecourse (HELAA Ref: GRE3- site details accompany representation) 2. Land adjacent New Road, Newbury (HELAA Ref: GRE6 - site details accompany representation) 3. Land South of Pinchington Lane, Greenham, Newbury: (HELAA Ref: GRE1- site details accompany representation) 4. Land at Lower Way Farm, Thatcham' (HELAA ref: THA9 – site details accompany representation). Alternatively the site could be accommodated within a revised settlement boundary |
| Solve Planning for Harry West Investments Ltd. | Land at Stoney Lane has not been allocated despite being well located for access to Newbury. Information in support of the allocation has been submitted. The site is close to the proposed allocation 'Land at Coley Farm' (RSA3). |
| Pegasus Group for Donnington New Homes | Representations re Sandleford Park South. The Council has inaccurately categorised the site in relation to its suitability for development. The conclusion significantly overlooks the range of benefits that could be delivered - of key importance is the delivery of the Wash Common Relief Road. This has been a long-standing local aspiration as evidenced by its reference within the Newbury Town Plan 2019-2036 (Adopted June 2018) and WBDC's own conclusions on the suitability of Sandleford Park South to deliver an additional access to Sandleford Park (reference to Highway and Access matters, Appendix 4 of the January 2023 HELAA). |
| Pegasus Group for Donnington New Homes and Gladman | Representations re Sandleford Park South The HELAA should be corrected to refer to the NEW8 site as Sandleford Park South. Representation concludes that site is suitable, supported by landscape appraisal. |

| Consultee | Main issues |
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| Gladman Developments | Representation re 'Sandleford Park South'. Site provides the opportunity to deliver the much desired fifth access into Sandleford Park and alleviate congestion along the A343 whilst improving access to the A34. Representation includes site submission profile, including Landscape Appraisal. |
| Savills UK for the Englefield Estate | In order to ensure the soundness of the Plan, additional housing sites should be identified to ensure that local housing needs are met. |
| Iver Consulting Ltd for Prosper Infinity Ltd | Representation re. Former Newbury Leisure Park. Proposed mix of C2 and C3 uses on redundant brownfield site outside but adjacent to settlement boundary. Accompanying site details and proposals supplied including summary of FRA. |
| Turley for Hathor Property | Representation re. Land at Enborne Street, Newbury for up to 70 dwellings. . |
| Turley for Donnington New Homes | Representation re. Land at Long Lane, Newbury for up to 260 dwellings Considered the plan does not propose medium sized sites that can come forward in the interim period to ensure housing delivery. The site at Long Lane for approximately 260 dwellings is available and deliverable under land controlled by Donnington New Homes. Accompanying site details and SA/SEA of site supplied. |
| Opus Works for Chartfield Homes and Newbury and Crookham Golf Club (NCGC) | Representation re. land at NCGC for 31 dwellings. Proposed residential development at NCGC for enabling development should be included in the list of larger sites Site details and suggested policy wording supplied. |
| Woolf Bond Plan for Commercial Estates Group (CEG) | Representation re. Land to the north of Newbury for 400 dwellings either side of the A339. The Plan as prepared is not legally compliant as the SA/SEA has not considered reasonable alternatives, especially non-strategic sites of less than 1,000 dwellings around Newbury/Thatcham. Questions assessment of site through HELAA and SA/SEA. |
| White Peak Planning Ltd for Bloor Homes Ltd | Representation re. Land South of Gorse Covert (HELAA GE2) for approximately 200 homes: Proposed amendment: to increase the Sandleford Park Strategic Allocation capacity to <u>approximately 1750 dwellings</u> . The site is being promoted by the developer for Land at Sandleford Park, offering maximum potential to integrate the site into the existing allocation. Policy CR3 Sandleford Park was intended to deliver up to 2,000 homes. Site constraints and the importance of delivering a significant level of green infrastructure have reduced its capacity to around 1,500 units. The SA/SEA considered four options for Sandleford Park (Table 28, page 36). It did not consider an additional option to include Land South of Gorse Covert. Questions assessment in HELAA and submits a Preliminary Landscape Review of the site. |

| Consultee | Main issues |
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| Barton Willmore, now Stantec for Donnington Valley Group Ltd | <p>Representation re Land at Donnington Valley Golf Course for approximately 50 – 100 dwellings</p> <p>In limiting the ambition of the settlement boundary review, the Council has overlooked the opportunity to consider potential for development on well-located sites in close proximity to existing settlements.</p> <p>The approach also overlooks the circumstances relevant to settlements such as Donnington which, whilst below the Council's settlement hierarchy, has a close functional relationship to Newbury and, therefore, benefits from the services and facilities in Newbury which are readily accessible.</p> <p>Representation accompanied by Landscape and visual Appraisal</p> |
| TOWN for landowners of Land East of Pincents Lane | <p>Given that part of the North East Thatcham allocation lies in area of flood risk and the full extent of the development site has not been shown to comply with the Sequential Test we object to the figure of 1500 for this site. The strategy of a full third of the homes proposed in West Berkshire being provided from only two of the sites cannot be said to be justified or consistent with National Policy. Numbers allocated in the current plan period are over-optimistic and the delivery trajectory for both strategic sites should be flatter - fail to meet the test set out in paragraph 73 d) of the NPPF</p> <p>Spatially imbalanced strategy</p> |
| Cunnane Town Planning LLP for Colthrop Village Consortium | <p>Representation re. Colthrop Village.</p> <p>The Plan does not take into account other reasonable alternatives to North East Thatcham such as Colthrop Village.</p> <p>Propose the deletion of the SP17 allocation and the allocation of Colthrop Village as a more sustainable alternative.</p> <p>Site details and assessments included in representation.</p> |
| Carter Jonas for the Trustees of the Frank Wallis Estate | <p>Representation re land to the east of Waller Drive, Newbury for up to 350 dwellings</p> <p>The land East of Waller Drive, Newbury provides an opportunity for sustainable residential development in close proximity to employment uses, public transport nodes and the services and facilities of Newbury and Thatcham.</p> <p>An additional parcel of land south of Turnpike Road is available for commercial or specialist residential purposes.</p> <p>Site details and Vision Document submitted.</p> |
| Lochailort Newbury Ltd | <p>Owner of Kennet Centre, Newbury</p> <p>Consider that the Kennet Centre site allocation should be reinstated to acknowledge the importance of this site to Newbury in terms of town centre uses, significant residential development, highly sustainable location and regeneration.</p> <p>A site allocation would acknowledge the significant challenges the existing Kennet Centre faces and the considerable benefits its redevelopment would bring to Newbury. It would also assist in the delivery of this important site.</p> <p>Suggested amendments to proposed policy in Reg 18 consultation regarding quantum of development, existing uses and development density.</p> |
| Nexus Planning for Croudace Homes | <p>Representation re. Land at Henwick Park.</p> <p>Recommends that allocation RSA2 be removed from LPR as remain uncertainties, as evidenced in 5YHLS.</p> <p>Allocation of Henwick Park would add more choice to the land identified for the delivery of housing and would help to make a meaningful contribution to the delivery of a range of housing in the short-term</p> <p>Range of supporting information supplied with representation.</p> |

| Consultee | Main issues |
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| Stantec for Sulham Estate | With the large allocations, e.g. NE Thatcham, concerns that the housing will not be delivered in accordance with the Council's housing trajectory - substantial infrastructure will need to be delivered prior to any housing delivery. The Council should also utilise smaller sites to keep a steady supply of housing (promoting TIL18). |

Summary of issues raised:

- Site allocation policies need revising to take account of environmental constraints and requirements / opportunities to ensure sites are delivered sustainably.
- Several sites within the settlement boundary of Newbury have not been allocated and should be, eg. Kennet Centre, LRIE, Gateway Plaza, and Former Magistrates Court. Some of these are at risk of flooding and/or within the River Lambourn Nutrient Neutrality Zone and the site specific policies should consider these. Failure to consider such sites has resulted in more greenfield sites than necessary being allocated.
- Support for removal of Kennet Centre as an allocation.
- Concern that allocation RSA2 will not deliver.
- Several sites in Newbury under construction and should therefore be allocated.
- The infrastructure associated with the proposed strategic site allocation at North East Thatcham would only benefit the new houses, and not the wider town as currently stated.
- No justification for reduction in dwellings at North East Thatcham.
- SA/SEA has not considered reasonable alternatives
- Reasonable alternative in Thatcham not considered, eg. Colthrop Village, Thatcham
- Over reliance on strategic sites for meeting housing need.
- Need for further allocations to ensure housing needs met, that medium-sized sites come forward, and contribute to housing delivery in short term. Additional sites in Newbury and Thatcham suggested for allocation:
 - East of Hill Road, Speen
 - West of Hill Road, Speen
 - Land south of Newbury Racecourse, Newbury
 - Land adjacent New Road, Newbury
 - Land south of Pinchington Lane, Greenham
 - Land at Lower Way Farm, Thatcham
 - Former Newbury Leisure Park, Thatcham
 - Land at Enborne Street, Newbury
 - Land to north of Newbury
 - Land at Donnington Valley Gold Course

- Land south of Turnpike Road
- Land at Henwick Park
- Newbury and Crookham Golf Club
- Potential for fifth access and capacity at Sandleford Park to be increased through the allocation of adjoining land:
 - Land south of Gorse Covert
 - Sandleford Park South
- Several well located sites have not been selected for allocation – Land at Stoney Lane, land east of Waller Drive
- HELAA has not taken into account the benefits that the development at Sandleford Park would bring.
- The name of site NEW8 in the HELAA is incorrect – it should be Sandleford Park south.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP14 Sites allocated for residential development in Eastern Area

Number of representations received: 33

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|------------------------------------|--|
| Reading Borough Council (RBC) | All of the sites within the Reading urban area itself (RSA6, RSA7 and RSA8) are already allocated within the existing Local Plan. There are no significant cross-boundary implications as a result of this policy which RBC therefore supports. |
| Holybrook Parish Council | The plan is not strong enough in favour of protecting neighbourhoods |
| Stratfield Mortimer Parish Council | 6.36 – This paragraph identifies Mortimer as a Service Village, whereas in the settlement hierarchy it is defined as a Rural Service Centre |
| Theale Parish Council | HSA15 - object to this as an increase in the population here would use Theale's facilities which are already struggling e.g. GP surgery, schools etc. |
| Burghfield Parish Council | Conflicts with SP4 – an additional 60 houses in the Eastern Area that are unlikely to be developed and should be removed from the plan as undeliverable. |
| Tilehurst Parish Council | <p>Good to see that no further development is necessary outside settlement boundaries to meet the anticipated housing need and that the plan delivers the anticipated need.</p> <p>Agree with decision to exclude sites larger than 10 units from calculations of future supply.</p> <p>TIL13. Unclear how the figure of 138 dwellings has been generated. Important details that contribute to the rejection of this site have not been transferred to the SA/SEA.</p> <p>TIL19 (new site) – no record of having been consulted on this site. Not clear why it is being assessed as it is within the settlement boundary. There are a lot of unknowns regarding the site's availability.</p> <p>SA/SEA - Appendix 8b – TIL13.</p> <p>Page 31 states no comments from the Parish Council but we were not consulted.</p> <p>Page 31 (water supply) – suggests a planning application is expected despite numerous failed attempts and rejection from selection in the LPR.</p> <p>Planning reasons not to allocate are not sufficiently explained.</p> <p>Numerous points from the HELAA are poorly summarised or not included in the site assessments.</p> |

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| Tilehurst NDP Group | As for Tilehurst Parish Council |
| Aldermaston Parish Council | Note no new housing is proposed for the Parish of Aldermaston, due to its proximity to AWE. |
| Environment Agency | The site allocations presented in Chapter 8 have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document |

General Consultation Bodies:

| Consultee | Main issues |
|--|---|
| RPS for Atomic Weapons Establishment | AWE is supportive of no additional sites being brought forward through Neighbourhood Plans in the Eastern Area given that Burghfield Parish lies within the DEPZ for AWE Burghfield. AWE fully supports the non-allocation of the Grazeley Garden Town. AWE object to the re-allocation of land adjoining Pondhouse Farm, Clayhill Road. Despite this allocation being within the current local plan, due to the redefining of the DEPZ during the plan period, this allocation for 100 residential units would now be in direct contravention of SP4 |
| Berkshire, Oxfordshire and Buckinghamshire Integrated Care Board (BOB) | The 50m ² requirement additional GP space for Tilehurst, Calcot, Purley and Theale in the IDP should be expressed as net and not gross area. This space would cost approx.. £350,000 to build and not £150,000. If £350,000 developer contributions are sought, this should be sufficient for the local GP practices to deal with the additional capacity, either through the additional 50m ² floor space, or internal modifications to create additional space. For Burghfield, the additional 25m ² additional floorspace for GP premises described in the IDP should also be expressed as net and not gross and would cost around £175,000 to build instead of £75,000. £175,000 would be sufficient to deal with additional capacity, either through additional space or internal modifications. |

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | Theale used to be a village and the pace of growth has not been sustained with commensurate advances in facilities and services. Original residents were living in a village, and now that it has grown, some have no means now to move to a village. More Traffic |

| | |
|---|---|
| | <p>Drainage Impact on wildlife and climate crisis by removing green areas. Should be no further growth at Theale No justification as to why a 'period of consolidation' to upgrade services and facilities as required previously is no longer required. Many windfall sites are larger than 10 homes. This is leading to more homes than are necessary.</p> |
| Save Pincents Hill and Save Calcot Action Group | <p>Comments on Site TILTIL13 Pincents Lane, Tilehurst (138 dwellings): Several facts are incorrect in SA/SEA - details in representation. This piece of land forms a gap between settlements and would appear that it retains this status in the New Local Plan – will the Council rescind this? Why is the Council listing all the reasons why this site should even be considered for development as it would appear to be encouraging the owners to put in another planning application?</p> |
| Cllr Alan Macro | <p>Sites identified by policies RSA10 and RSA11 have not been included in the West Berkshire Strategic Transport Model or the Air Quality Assessment. Sites would greatly exacerbate existing traffic problems in Theale (representation includes traffic data for Theale). Sites RSA10 and RSA11 are close to the A4 and M4 Junction 12. This means that many journeys will be by private car, which is unsustainable. Sites RSA 10 and RSA11 should be removed from LPR.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Barton Willmore, now Stantec for The Sulham Estate | <p>Promoting Land at Hall Place Farm, Tilehurst. Objection to the Council's approach on the basis that the Local Plan Review does not include any additional site allocations in Tilehurst. Disagree with assessment in site selection process – Landscape and Visual Appraisal accompanies representation. The Site should be included within the settlement boundary and allocated for development as it presents an opportunity for development which is consistent with the existing settlement form and could be successfully and sympathetically accommodated within the landscape.</p> |
| Savills UK for the Englefield Estate | <p>The Estate's landholdings at Burghfield Common include land adjacent to Pondhouse Farm (ref. BUR10) and land at Hollybush Lane, Burghfield Common (ref. SUR3). Recommended that some provision is made for additional housing at Burghfield in order to ensure certainty of future housing supply. The Estate has landholdings at Spring Lane (ref. SM4) and Monkton Copse, Mortimer (ref. SM5). Mortimer is located just outside the DEPZ in the Eastern Area and has potential to accommodate additional development within the LPR plan period to 2039 (beyond the existing Neighbourhood Plan period).</p> |

| Consultee | Main issues |
|---|--|
| Bell Cornwell LLP for Hathor Property Limited | <p>The LPR does not allocate any small sites, less than 1ha, for general residential development in the Eastern Area. The LPR should accommodate at least 10% of the housing requirement on sites no larger than 1ha as emphasised in NPPF Para 69. We submit that it would be sensible to take this approach in each of the three spatial areas.</p> <p>Client's site adjacent to Brimpton settlement boundary should be allocated (not previously submitted for consideration in the HELAA – submission form, site details and heritage impact assessment submitted with representation).</p> |
| John Cornwell for I Cheshire Esq, The Russell Trust, and R. Shaw Esq. | <p>Representation re. Land 'Land to the rear of The Hollies Nursing Home, Reading Road and Land opposite 44, Lamden Way, Burghfield Common'. (HSA16 of the HSA DPD).</p> <p>Phase One of the site has already been implemented. The second phase is proposed for 32 dwellings. The allocation was followed by the optioning of the land by a reputable local developer and the submission of a detailed planning application in early 2022 under ref: 22/00244/FULEXT. The extension of the Detailed Emergency Planning Zone (DEPZ) at AWE Burghfield occurred in March 2020. In December 2020 the Council consulted on this LPR Emerging Draft yet the site was still proposed for allocation in that Draft Plan - therefore no necessity to challenge the Draft Plan at that time as far as this allocation was concerned. It was assumed that the Council had taken the DEPZ changes into account. During consideration of the planning application the Council's Emergency Planning Officer objected to the proposed development and the application was refused. The only substantial planning objection was its inclusion within the recently extended DEPZ. That decision is awaiting an appeal decision by way of a Public Local Inquiry.</p> <p>If the DEPZ objection is to be applied consistently then it effectively sterilises Burghfield Common to all new housing development which cannot reasonably be justified when weighed against the proper planning requirements of the area. The allocation should properly be reinstated as a Housing Allocation in this Local Plan Review. (See also comments on SP4)</p> |
| Opus Works for Bewley Homes PLC and Calcot Park Golf Club (CPGC) | <p>Representation re. Land at CPGC for approximately 72 dwellings:</p> <p>CPGC is a leisure facility located in a highly accessible location. A scheme of c.72 dwellings on surplus land is currently proposed, and identified as a quantum that could provide both the enabling development desired and the delivery of affordable housing - retention of long-term golf at CPGC is the scheme driver with improvements to the clubhouse and course.</p> <p>Policy SP14 is objected to because insufficient land is allocated to meet identified need. CPGC needs to be included in the list of larger sites (1ha or larger). It would help meet local need and remove any requirement to impose housing numbers and allocations upon the Tilehurst NDP.</p> <p>Suggested wording for policy supplied together with site details and layout plan.</p> |
| Pro Vision for T A Fisher & Sons Ltd | <p>Representation re. Land 'Land to the rear of The Hollies, Burghfield Common' (HSA16 of the HSA DPD) -</p> <p>The development of the western part of the allocated site can be achieved and is deliverable now. We contend that the Emergency Plan can be updated to accommodate the delivery of 32 units without impacting adversely on the operation of AWE Burghfield, public safety or the functioning of the Emergency Plan. The LPR as currently drafted is unsound, as it is not justified, not consistent with the Framework and not positively prepared.</p> |

| Consultee | Main issues |
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| | <p>The de-allocation of site HSA16 is not consistent with the Council's approach to its development strategy and the settlement hierarchy. In addition, its approach towards a 'moratorium' on further development within the parish of Burghfield Common is flawed.</p> <p>In Appendix 7 (Schedule of Policies to be Superseded / Deleted) of the LPR there is no explanation why the site has been removed from the Plan other than not considered deliverable at this time. The site is under option to a housebuilder who has submitted a full application for planning permission on the allocated site. The site is therefore regarded as deliverable under the NPPF definition.</p> <p>An update to the HELAA has been prepared (January 2023) which excludes the site. There is no commentary on why it has been removed from the HELAA. Other sites within Burghfield Common (and therefore within the extended DEPZ) are shown as not being 'automatically excluded' from further consideration. The HELAA confirms at paragraph 2.2 that sites within notified safety zones (i.e. AWE Burghfield) will not automatically be excluded but the impact assessed on merits, and advice from the Ministry of Defence has been fed into the site assessment.</p> <p>Council has carried forward the allocation of site at Poundhouse Farm (HSA15) into Policy RSA12 of the LPR. Fundamental inconsistencies as an allocated site should hold the same weight as a site with planning permission having regard to the definition of deliverable in the Framework.</p> <p>The AMR is a significant and material consideration. If the Council intended to prevent any further development in the DEPZ, then the AMR, published after the decision on application 22/00244/FULEXT was made, would have removed the site from Table 3.7 (Local Plan Housing Sites progress).</p> <p>There is no change in activity at AWE and no greater risk to the public. The change in the planning policy position in respect of this site between the Reg 18 consultation and this Reg 19 consultation is therefore not explained or evidence based.</p> <p>Reference to appeal decisions at Boundary Hall, Tadley in 2011 and Three Mile Cross in Wokingham, which serve to highlight that residential development in the DEPZ can be allowed and therefore further supports the case for carrying forward the allocation.</p> <p>Consider that the Council's failure to carry forward allocation HSA16 into the plan is not justified. No sound reasons have been provided and this results in the plan not being positively prepared. The Council should reinstate the allocation of the site in the Local Plan and update the Emergency Plan to accommodate it.</p> |
| TOWN for landowners of Land East of Pincents Lane | <p>Representation promoting allocation of Land East of Pincents Lane (TIL13)</p> <p>Object to the allocation of site RSA11, the former sewage treatment works at Theale, since it is in a zone of higher flood risk than TIL13.</p> <p>Policy of not allocating sites for development in the Tilehurst NDP has yet to be tested at its own Examination. It is contrary to the advice at paragraph 66.</p> <p>Policy SP14 therefore fails to make appropriate provision for the scale of need in the Eastern Area and also fails to provide for any of Reading's unmet needs</p> |

| Consultee | Main issues |
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| Pro Vision for T A Fisher & Sons Ltd | Representation re Land at West End Road, Mortimer (HELAA ref. SM2) for approximately 47 dwellings Policy SP14 fails to recognise that as the draft Local Plan extends to 2039, additional housing should be allocated at Stratfield Mortimer beyond 2026, in line with the spatial strategy and settlement hierarchy and in accordance with the NPPF Para. 66, to be accommodated through a NDP Review. Reference to Mortimer as Service Village is incorrect. Representation includes site details |
| LRM Planning Ltd for Hallam Land Management Ltd. | Representation re land at Kiln Lane Mortimer for approximately 75 dwellings. Site details and Vision document to support allocation included in representation. |
| Charlesgate Homes Ltd. | Of the 386 sites proposed in the Eastern Area, only 116 are additional to those in the Housing Site Allocations DPD. This is not satisfactory given the housing shortage and the fact that this area is unconstrained by the AONB. RSA7 – this site has delivery issues with access, yet is allocated. The reasoning for the significantly reduced numbers of housing in this location is due to the increase in the AWE Detailed Emergency Planning Zone (DEPZ) and policy that precludes development within this zone. ONR only objected to Grazeley proposal in this zone in the HELAA, no other sites were objected to. Never been individual site assessments of any other sites that were deemed ‘developable’ prior to the changes in the DEPZ in 2020. To suggest that ONR has stated no more homes can be built in the DEPZ is erroneous. The new DEPZ goes far in excess of the Urgent Protective Action Zone (UPAZ) of 3160m and splits part of Sulhampstead and goes beyond the settlement boundary of Burghfield Common – against REPPiR directives. No supporting evidence to support a housing moratorium in Burghfield Common. HELAA assessed SUL1 favourably and the sole reason it has been excluded as it is within the DEPZ. The site is outside the UPAZ, and no detailed emergency plan is required to enable urgent protective actions at this site. AWE does not pose a significant risk and the site would not affect the functions of the emergency services or the Council. SUL1 should not have been omitted as a developable site. No justification for a moratorium on housing in and around Burghfield DEPZ. The size and position on the DEPZ is not justifiable and could be amended to exclude SUL1. |
| Turley for Donnington New Homes | The plan does not propose medium sized sites that can come forward in the interim period to ensure housing delivery. |
| Boyer Planning for Darcliffe Homes Ltd. | Advises that the Council reconsider the omission of an allocation for residential development at Land west of Little Heath Road, Reading, in order to be found sound. Recommend the inclusion of site allocations for residential development at ‘Land to the east of Long Lane & south Blackthorn Close, Tilehurst’, and ‘Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst’. |

| Consultee | Main issues |
|--|---|
| Nexus Planning Ltd. for Croudace Homes | Some of the sites are subject to constraints will affect their deliverability and they should be removed: RSA17, RSA19, RSA22, Lambourn NDP (River Lambourn Nutrient Neutrality Zone). The resulting shortfall should be made up from sites such as Henwick Park. |

Summary of issues raised:

- No significant cross-boundary implications. Support for policy from Reading Borough Council.
- Plan does not protect neighbourhoods
- Mortimer incorrectly identified as a Service Village at para 6.36 – it is a Rural service Centre.
- Site allocation policies need revising to take account of environmental constraints and requirements / opportunities to ensure sites are delivered sustainably.
- Support by AWE for non-allocation of Grazeley and no additional sites being brought forward in Neighbourhood Plans in the Eastern Area
- AWE object to the allocation of Pondhouse Farm. Site within the DEPZ and allocation is contrary to policy SP4.
- The requirement in the IDP for additional GP space should be expressed as a net area, not gross area. Change to a net area results in change to costs.
- The SA/SEA for Pincents Lane, Tilehurst (TIL13) includes incorrect information for the site, eg. most of Pincents Lane single lane, Pincents Lane is an ancient sunken lane, there are 4 footpaths not 2 across the site
- Concern that the Council rescind the gaps between settlements
- The Air Quality Study and the West Berkshire Strategic Transport Model omit allocations RSA10 and RSA11. Sites are unsustainable and should not be allocated.
- Additional sites should be allocated for reasons that include there being no small site allocations, incorrect assessments in site selection process, insufficient land to meet needs:
 - Land at Hall Place Farm, Tilehurst
 - Spring Lane, Mortimer
 - Monkton Copse, Mortimer
 - Land at West End Road, Mortimer
 - Kiln Lane, Mortimer
 - Land west of Brimpton Road, Brimpton
- Additional housing provision should be made in Burghfield, for example SUL1 should be allocated. No reason for moratorium on housing that falls within the DEPZ in Burghfield. The Housing Site Allocations DPD allocation at The Hollies should be retained in the Local Plan Review.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP15 Sites allocated for residential development in North Wessex Downs AONB

Number of representations received: 25

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---|---|
| Environment Agency | The site allocations presented in Chapter 8 have not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of each site to accommodate development. Including this information in the policy page will provide perspective which then highlights the need for the necessary requirements to allow development on these sites. We have concerns and have provided this information in a separate document |
| Hermitage Neighbourhood Plan Steering Group | Object to strategy and site allocations for Hermitage. The proposed allocations to deliver 59 dwellings in Hermitage has increased from the previous Reg. 18 which had 45 dwellings. RSA 20 and RSA 21 not have planning permission for more dwellings than in the LPR, therefore the total dwellings proposed in Hermitage is now 76. No evidence to assess the cumulative impact of proposed dwellings in Hermitage. The strategy of limiting growth in the AONB has not been applied in Hermitage. |

General Consultation Bodies:

| Consultee | Main issues |
|--|--|
| Berkshire, Oxfordshire and Buckinghamshire Integrated Care Board (BOB) | For growth in the AONB, the additional 50m ² additional floorspace for GP premises described in the IDP should also be expressed as net and not gross and would cost around £350,000 to build instead of £150,000. £350,000 would be sufficient to deal with additional capacity, either through additional space or internal modifications. |

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | No development has been allocated for Upper Basildon. This location could contribute towards meeting this district's needs as well as making Upper Basildon more sustainable. An allocation for a new village shop and employment should have been considered, as well as land for housing to alleviate the current high prices. |
| Cllr Alan Macro | Allocations are too restrictive - should be reviewed and increased where they would be sustainable and compliant with other policies in the plan |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|---|
| Fisher German LLP for Mr Musgrave and Mr Begley | Promoting site in Chieveley, arguing proposed allocation insufficient for high level of housing need, particularly for affordable housing. |
| Neame Sutton Ltd for Donington New Homes | Consider that this policy should be revised to account for the opportunities to release land to enable delivery of housing in the early years of the Plan, particularly within the sustainable settlement of Hungerford. Promoting land at Smitham Bridge Road and Marsh Lane which has been promoted through the emerging Hungerford Neighbourhood Plan (Illustrative masterplan and submissions to NDP attached to representation). |
| Pro Vision for The Trustees of the Allan Snook Will Trust | Promotion of site 'Land south of Recreation Ground' (HELAA Ref: BOX1) adjacent to the Boxford settlement boundary. |
| Nexus Planning for Pangbourne Beaver Properties Ltd | Object to Policy SP15 as the site allocations made therein are internally inconsistent with the identified spatial strategy and settlement hierarchy. Object to the subsequent failure of the Plan to allocate any development at Pangbourne (a Rural Service Centre) whilst allocating development in materially less sustainable locations, and on sites that are far less logical / justifiable than Site Ref: PAN8 at Pangbourne (Land to the north of Sheffield Place). Site adjoins the existing settlement of Pangbourne, is within easy walking distance of Pangbourne railway station and the village centre, and sits well within the landscape. The allocations made in the Plan do not accord with the identified Vision / Objectives / Policies. Representation argues need for additional housing in Pangbourne. It includes analysis of proposed allocations in AONB, assesses the PAN8 site against the same criteria applied to these sites, and details the merits of the promoted site and the landscape and highways impact. |

| Consultee | Main issues |
|---|---|
| Boyer Planning for <ul style="list-style-type: none"> • Sovereign • Darcliffe Homes | Recommended that additional wording is included within Policy SP15 to confirm that the identified capacity for each allocated site represents an approximate capacity and not a cap. |
| Turley Associates for Pangbourne College | <p>Pangbourne College has a suitable site (Bowden Fields) which should be allocated to provide elderly living accommodation to assist with meeting the housing requirement.</p> <p>Disagree with 4.19 that Pangbourne has limited development opportunities.</p> <p>Centenary Fields on the periphery of the College's estate is also suitable for housing allocation – infilling an existing estate and the existing settlement.</p> <p>Land at Berecourt Road (Pangbourne) is similarly suitable for allocation. Houses were allowed on appeal adjacent to this site.</p> |
| Carter Planning Limited for Mr R L A Jones | <p>Our Client takes exception to the failure by the Council to consider site LAM007 "Land between Folly Road, Rockfel Road and Stork House Drive". It was previously considered to be a suitable site, is a more logical site than the two considered (HSA 19/RSA 22 and HSA20/RSA 23) and has been assessed as being sustainable. Unlike the other two it can come forward straight away to be developed.</p> <p>The reliance on allocations through the Neighbourhood Plan process raises questions as to whether the objectively assessed needs will be met within the plan period increasing pressures on other settlements to meet the unmet need.</p> |
| Savills for Lambourn Business Park | <p>Our client's site is suitable and deliverable. It should be included as a non-strategic allocation under this policy to ensure the plan is sound. Also willing to consider a larger development on additional land within the same ownership.</p> |
| Pro Vision for CALA Homes | <p>Regarding approach to NDPs, what is missing is a contingency in the event that the neighbourhood plan process does not succeed as expected. An obvious option would be to include a time limit within the LPR for sites to be identified and confirmed as allocations. A positive planning approach would be to include the contingency in the LPR (involving a modification to Policy SP15 and the supporting text, including paragraph 6.40 and 6.41).</p> <p>There seems little purpose to listing the Compton and Hermitage Neighbourhood Plans in policy SP15, which is about site allocations in the AONB area. Both are now listed as providing no additional homes.</p> <p>Local housing need in AONB: The Updated Housing Need Evidence (UHNE) identifies a substantial affordable housing need in the AONB. However, the proposed scale of the district's growth directed to the AONB is less than 5% and will fall well short of meeting the need.</p> <p>The evidence base supporting the emerging Hungerford NDP includes a report into development need published in 2019 by Aecom, which reports a Housing Needs Figure equating to a total of 486 over the Plan period (2018 to 2036) and severe lack of suitable affordable houses. There is evidence to strongly indicate that there is significantly greater capacity in and immediately around the town. Sites HUN12 and HUN14, for example, could potentially deliver in the order of 150 homes immediately adjacent to the current settlement boundary. The LPR however provides no incentive</p> |

| Consultee | Main issues |
|--|--|
| | for the Town Council to look more keenly for available land given the very modest requirement There is clear justification for further growth, without necessarily compromising the designated landscape. |
| Savills UK for the Englefield Estate | <p>Opportunities exist within Englefield village (e.g. HELAA site refs. ENG1, ENG2 and ENG3) to ensure that it remains a diverse, vibrant and rural community with a mix of housing, employment and education which sustains the community and contributes to meeting the needs identified in the LPR.</p> <p>The Estate's landholdings at Cock Lane, Bradfield Southern (ref. BRAD4) is situated within the existing settlement boundary of Bradfield Southend, therefore situated in a sustainable location could accommodate in the region of 4-5 dwellings to meet local needs.</p> |
| WSP for Mr Charlie Parker | <p>Promoting Windsor House Paddocks, Lambourn through Local Plan and Lambourn NDP.</p> <p>Representation includes details of suitability of site and reference to previous representations and evidence from the Housing Allocations DPD. Disappointing to see that two previously undelivered sites have been rolled over to the Regulation 19 Plan without the addition of any other allocations in the village. There is no immediate indication that these sites will be delivered in the near term, therefore they are not addressing current and growing housing needs in the area. Our client is exploring the ability to accommodate a number of units to be made available specifically for local people working within the racehorse industry.</p> |
| Boyer for Darcliffe Homes | <p>Promoting</p> <ul style="list-style-type: none"> • Land west of Little Heath Road, Reading for approximately 322 dwellings • Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A'), for approximately 30 homes • Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B'), for approximately 49 homes. <p>Representations include reasoning for allocation, site details and assessments and SA/SEA of sites.</p> |
| Thakeham Homes | <p>Promoting Land at West of Wantage Road</p> <p>Supportive of this policy, encouraging NDPs being prepared in Lambourn and Hungerford to allocate housing, but emphasise the point about making sure that each allocation is deliverable. Additional allocations in LPR could help meet housing need.</p> <p>Representation includes Vision Document for promoted site.</p> |
| Pegasus for Friday Street Developments Ltd | <p>Representation re. Land to the Rear of Ash Grove (BRAD6) Bradfield Southend for up to 16 dwellings</p> <p>The landowner is fully supportive of the broad concepts of the draft Local Plan, including the spatial strategy, settlement hierarchy and quantum of development across the district. However, considered that the Council has failed to adequately assess the deliverability of the site and the significant benefits the site can provide to the community as a whole.</p> <p>Representation includes site details.</p> |
| Nexus Planning for Croudace Homes | <p>Scale of development within AONB should be limited.</p> <p>Some draft allocations have constraints which should see them removed from LPR:</p> |

| Consultee | Main issues |
|---------------------------------|--|
| | <ul style="list-style-type: none"> • RSA17, RSA19 and RSA22, together with 25 units delegate to Lambourn NDP - highly constrained by issues surrounding nutrient neutrality. • RSA16, RSA17 and RSA19 are not suitable owing to landscape impacts. RSA23 considered only developable in part and site's yield should be reduced to 10 units. The 55 units directed to Hungerford NDP should be removed from supply given objectives to protect the AONB. • RSAS14 and RSA15 and RSA21 recommended to be removed from supply as there remain uncertainties as evidenced in them not being included in 5YHLS. |
| Turley for Donnington New Homes | The plan does not propose medium sized sites that can come forward in the interim period to ensure housing delivery. |
| Pro Vision for Rivar Ltd. | Support allocation of RSA16 |

Summary of issues raised:

- Site allocation policies need revising to take account of environmental constraints and requirements / opportunities to ensure sites are delivered sustainably.
- The strategy of limiting growth in the AONB has not been applied in Hermitage.
- The cumulative impact of development in Hermitage has not been considered.
- The requirement in the IDP for additional GP space should be expressed as a net area, not gross area. Change to a net area results in change to costs.
- Additional sites should be allocated for reasons that include no new allocations in Lambourn, significant affordable housing need in the AONB, to assist in meeting housing need, sites needed in the early part of the plan period, to assist in meeting need for elderly persons accommodation:
 - Upper Basildon
 - Chieveley
 - Smitham Bridge Road, Hungerford
 - Marsh Lane, Hungerford
 - Land south of recreation ground, Boxford
 - Bowden Fields, Pangbourne
 - Land at Berecourt Road, Pangbourne
 - Land between Folly Road, Rockfel Road and Stork Drive, Lambourn (LAM1)
 - Windsor House Paddocks, Lambourn

- Lambourn Business Park
- Land west of Wantage Road, Lambourn
- Land west of Little Heath Road, Tilehurst
- Land to the east of Long Lane & south Blackthorn Close, Tilehurst ('Site A')
- Land east of Sulham Hill between Barefoots Copse & Cornwell Copse, Sulham Hill, Tilehurst ('Site B')
- Englefield – ENG1, ENG2 and ENG3
- Cock Lane, Bradfield Southend
- Land rear of Ash Grove, Bradfield Southend
- Site allocations inconsistent with the spatial strategy – no allocations in Pangbourne yet less sustainable settlements have allocations. Land north of Sheffield Place, Pangbourne suitable for allocation.
- Policy should be reworded to identify that the level of development at each site is an approximate capacity and not a cap.
- Scale of development in the AONB should be limited. Several allocations should be removed due to constraints.
- Contingency required in the event that allocations in neighbourhood plans do not deliver, for example a time limit
- Little point in listing the NDPs in the policy which are not including allocations

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: SP16 Sandleford**

Number of representations received: 24

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------------|---|
| Newbury Town Council | Newbury Town Council opposes the Sandleford West development as Warren Road cannot be used to access these lands. If the allocations suggested regarding SP 12 were taken into account, the additional 500 homes would not be required on this greenfield site. |
| Thatcham Town Council | The failure of the Sandleford Strategic Site Allocation to deliver the expected number of houses suggests that relying on two strategic sites (with a number of smaller sites) is not the best approach. |
| Hampshire County Council | For Hampshire County Council to support the proposal for a new access onto the A339 it should be demonstrated that the strategic flow of traffic is prioritised and not compromised, and when all other reasonable options (such as taking access from nearby side roads) has been considered. It is Hampshire County Council's view that strategic traffic should be routed via the A34, therefore any evidence provided to demonstrate the suitability of a new access onto the A339 should take account of this position and consider wider strategic routes to and from the site. Would like to work closely with West Berkshire District Council to discuss modelling parameters and underlying assumptions. |
| Environment Agency | This allocation has not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of the site as required by national policy. Requirements: There should be no penetration of the London Clay strata. No discharge into groundwater and information should be provided to demonstrate this. There is no mention of the Enborne on the south boundary of the site or the provision of a buffer zone of a minimum of 10 metres to prevent run-of. Opportunities: There may be opportunities to enhance the river corridor which would contribute to biodiversity net gain. There is also various local wildlife sites and ancient woodlands which would need to be protected and a buffer of 15m between these and any Local Wildlife Site and Atomic Weapons Establishments |
| Historic England | Support the criterion limiting development to the north and west of the site to protect the setting of former Sandleford Priory. |

| Consultee | Main issues |
|--------------|--|
| | Support reference to landscape significance of the site on the A339 approach to Newbury |
| Thames Water | Development likely to require upgrades to the water supply and wastewater networks, including sewerage treatment infrastructure. |

General Consultation Bodies:

| Consultee | Main issues |
|--|--|
| Berkshire, Oxfordshire and Buckinghamshire Integrated Care Board (BOB) | The extension that Falkland Surgery would require for such a large housing development is estimated at £1.25m including VAT. The LPR should reference the increased amount of developer contributions required for this from that currently estimated. Failure to do this will mean that the extension will be unaffordable for the NHS. |
| Woodland Trust | Support policy requirement for protection of ancient woodland in line with the NPPF. Suggest inclusion of appropriate root protection areas for ancient and veteran trees – revised policy wording provided. |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | Not consistent with the outline planning consent for the site, which does not permit or include a direct connection with the western part, nor an exit via Warren Road. It must be assumed that these constraints will continue. The inclusion of Warren Road as an all-vehicular access route instead of the original 'sustainable transport link' is in conflict with DM8 e) and h). Site allocation sad given the amount of natural wildlife that will be affected. Had the site come forward now it likely would have been refused. Puts the concept of wildlife corridors into disrepute. Warren Road is unsuitable, yet is mandated for use by all vehicles. This will open up the area to further urbanisation, leaving no further greenspace between Newbury and Wash Water. |
| SayNoToSandleford | Request that access via Warren Road be removed as junction of Andover Road and Warren Road is unsuitable for all vehicle access, due to presence of schools and churches in the vicinity. Request that buffers between development and ancient woodland be changed to at least 15 metres. SP16 in conflict with DM8 para e. By changing the sustainable transport link via Warren Road to a main access route, vulnerable users will be subjected to additional air pollution. |

| Consultee | Main issues |
|----------------------------|--|
| Liberal Democrat Group | Considerable doubt as to whether the build-out of the whole site will be achieved before the end of the Plan period. The significant upgrade to sewage treatment works and drainage required means that the earliest completion of new units is likely to be significantly later than that shown in the 5YHLS. Issues with regard to link between Sandford Park East and West, and little confidence that the western part will proceed at pace and be delivered by 2039. Suggest allocation from Sandford within plan period be reduced to 1200. Suggested amendments to SP16 and para. 6.45 supplied. |
| West Berkshire Green Party | The two large developments on greenfield sites are not consistent with the NPPF and contradict many parts of the plan. They are also not deliverable within the plan period. |
| Cllr Alan Macro | Warren Road is not suitable for general vehicular access - should be re-worded so that Warren Road reverts to access for public transport and cycles as originally proposed. |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|---|
| Southern Planning Practice for Saunders Family | Object to the proposed allocation due to its history and unrealistic prospect of coming forward in the plan period. |
| Pro Vision for various landowners | It is considered that the housing delivery of 1,580 dwellings at Sandford Park during the plan period is questionable. The Regulation 18 Consultation on the LPR noted that Sandford Park was expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR's development strategy. |
| Pegasus Group for Donnington New Homes | Representation on behalf of promoters of Sandford West - supports the continued allocation of Sandford Park within the Plan, together with the policies which secure land for that purpose. Policy SP13 refers to ' <i>Sandford Park</i> ', Policy SP12 refers to it as ' <i>Sandford Park Strategic Site</i> ' and in Policy SP16 referred to as ' <i>Sandford Park Strategic Allocation</i> '. The Plan should be consistent throughout in its reference. Policy is unclear in relation to the requirement for Flood Risk Assessment - should be amended, to be clearer that a FRA for "the site" need only to relate to the land within a red line submitted with any given planning application. As currently drafted, the Policy requires that there should be an emphasis on homes with at least 3 bedrooms. It is entirely reasonable to expect that the housing mix requirements within the District may change over the Plan period and |

| Consultee | Main issues |
|---|--|
| | <p>Policy SP16 should be clearer that the housing mix should respond appropriately to the SHMA (or other relevant housing needs assessment) requirements relevant at the time an application is considered.</p> <p>Unclear why the Council has excluded land to the rear / south of Ashton House and Lynwood House at the eastern end of Warren Road from the allocation. That land falls within my clients control, and has previously been included in planning application proposals for the Sandleford Park West site</p> <p>The boundary line of the allocation across the south side of Eastern Fields within Sandleford Park West and on the eastern boundary, adjacent to A339 and north of the recycling centre, should be reviewed, tying in with planning applications on the land.</p> |
| White Peak Planning Ltd for Bloor Homes Ltd | <p>Representation re. Land South of Gorse Covert (HELAA GE2): Proposed amendment: to increase the Sandleford Park Strategic Allocation capacity to <u>approximately 1750 dwellings</u>. Policy CR3 Sandleford Park was intended to deliver up to 2,000 homes. Site constraints and the importance of delivering a significant level of green infrastructure have reduced its capacity to around 1,500 units. The SA/SEA considered four options for Sandleford Park (Table 28, page 36). It did not consider an additional option to include Land South of Gorse Covert. SP13 does not present an appropriate strategy in that it has not fully taken account of all reasonable alternatives i.e. an option to increase the size of the Sandleford Park Strategic Allocation. It also fails to include a parcel of land which would contribute towards the delivery of sustainable development, contrary to the intentions of the NPPF (2021). Questions assessment in HELAA and submits a Landscape Review of the site.</p> |
| White Peak Planning Ltd for Bloor Homes Ltd | <p>Representation obo developer of Sandleford Park East: Subject to submission and grant of planning permission for Reserve Matters, the site is realistically deliverable within the plan period. Proposed amendments to delete paragraph 6.55, delete requirement for a Minerals Resource Assessment and amendments to wording on sustainable transport routes. Significant concerns with the requirement for the provision of: “<i>On-site renewable energy to assist in the delivery of a carbon neutral development;</i>” and suggest replaced with a <u>sustainability and energy strategy</u> Paragraph 6.55 specifies that additional policy criteria will be added as the Local Plan Review progresses. This caveat should be removed. The policy needs to be clear and sound, giving certainty to the developers.</p> |
| TOWN for landowners of Land East of Pincents Lane | <p>Question delivery rates projected. Would not be sound to rely on the delivery of 1500 homes in the plan period, rather that figure should be reduced by at least around 250 units so that the rest will fall to be delivered beyond 2039.</p> |

| Consultee | Main issues |
|----------------------------|---|
| Turley for Hathor Property | <p>Delivery of Proposed residential site allocations</p> <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been ‘carried over’ from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.</p> <p>Following an initial review of this progress, the table below lists those sites where there has been no progress or where progress has stalled are listed in the table below <i>[for table in full, see attachment 'Turley (Hathor Properties) Table']</i>, along with a review of their current planning status.</p> <p>Retained allocation from Core Strategy: Sandleford Park, Newbury (Policy SP16) This is a site allocation being carried forward from the current adopted Core Strategy for approximately 1,500 dwellings (current policy CS3). 1,580 homes have been counted for in the Council’s housing supply position at 31st March 2022. It is unclear from the Council’s Annual Monitoring Report 2022 and Five Year Housing Land Supply 2022 statements how many dwellings arising from the Sandleford allocation are anticipated to be delivered within the 5 year period.</p> <p>The AMR does acknowledge <i>“the timing of delivery is likely to be largely in the period post 2026”</i>.</p> <p>The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p> |
| Charlesgate Homes | <p>This has been seen as a favourable site since 2000 and allocated in the last plan. However, there appears to be a heavy reliance on this site to deliver a significant part of the overall housing numbers, which clearly has delivery issues. Consider smaller sites with less reliance on multiple land owners. High amount of infrastructure commitment that clearly can’t be met on this site.</p> |
| Pro Vision for Rivar Ltd. | Delivery of 1,580 dwellings at Sandleford Park during the plan period is questionable |
| Newbury Racecourse | The housing delivery of 1,580 dwellings at Sandleford Park during the plan period is questionable. |

Summary of issues raised:

Representation on behalf of the developer of Sandleford Park East - Subject to submission and grant of planning permission for Reserved Matters, the site is realistically deliverable within the plan period. Some suggested wording amendments submitted – significant concern with provision of on-site renewable energy to assist delivery of carbon neutral development.

Other issues raised include:

- Thames Water notes that upgrades required to water supply and wastewater networks, including sewerage treatment infrastructure.
- Should be demonstrated that the strategic flow of traffic is prioritised and not compromised with new access onto A339 (Hampshire CC).
- Allocation has not considered/listed environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of the site (EA).
- Concern over use of Warren Road as access.
- The LPR should reference the increased amount of developer contributions required for extension to Falkland Surgery.
- Doubts as to deliverability within plan period.
- Request that buffers between development and ancient woodland be changed to at least 15 metres.
- Should be clearer that the housing mix should respond appropriately to the SHMA (or other relevant housing needs assessment) requirements relevant at the time an application is considered.
- The boundary line of the allocation should tie in with planning applications.
- Not fully taken account of all reasonable alternatives i.e. an option to increase the size of the Sandleford Park Strategic Allocation by allocating additional land to the south.
- Over reliance on this large site to deliver, and smaller sites with less reliance on multiple landowners should be considered.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP17 North East Thattham

Number of representations received: 496

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|-----------------------|--|
| Thattham Town Council | <p>SA/SEA Not legally compliant as have not considered all of the ‘reasonable alternatives’ to a single development of 1,500 homes. One ‘reasonable alternative’ that should have been considered is to divide the required number of homes between two sites (or perhaps even more). A review of Table 30, a comparison of SA/SEA aspects of Policy SP17 for 1,500 and 2,500 homes, should be part of a wider review of the SA/SEA in relation to North East Thattham. Thattham TC has submitted comments on this table with their representation.</p> <p>The sustainability appraisal of Policy SP17 is extremely superficial, and provides no evidence to support the assessments given, and is inconsistent with the assessment for site THA20 (the previous name for NE Thattham) as described in the HELAA 2020. Thattham TC provide a detailed analysis of the sustainability appraisal of Policy SP17.</p> <p>Housing Allocation.</p> <p>The wording of Policy SP17 is unclear and ambiguous on the expected final number of dwellings on the North East Thattham site. Policy SP17 says that the site is to be allocated for approximately 1,500 dwellings. Paragraph 6.61 says “Delivery of approximately 1,500 dwellings is anticipated within the plan period”. Policy SP17 is silent on the possibility of additional dwellings following the plan period. The Thattham Strategic Growth Study was prepared for a site allocation of 2,500 dwellings, and has not been updated following the decision. To make this aspect of policy SP17 sound, it must be clarified that the 1,500 dwellings is the final number when development is completed, and not the number completed during the plan period and supporting evidence needs to be provided to justify this number.</p> <p>Regarding delivery, no justification is provided for the increase from 1,250 to 1,500 in the number of dwellings anticipated to be delivered during the 17 year plan period. Concern regarding the constraints of water supply and treatment on the rate of housing delivery.</p> |

Ambiguity of wording

In many places, the intended meaning of the word “will” is not clear leading to considerable ambiguity. Should be clarified that only the last report of to the “Thatcham Strategic Growth Study provides “guiding principles for the delivery of the site”. Thatcham TC suggested amendments included within representation.

Status of the Thatcham Strategic Growth Study

Not legally compliant as the Thatcham Strategic Growth Study, which is neither a development plan document nor a supplementary planning document, is incorporated by reference into Policy SP17. It was not formally part of the Regulation 18 consultation, and only forms part of the supporting evidence to the Regulation 19 Consultation. Does not comply with the Statement of Community Involvement.

There is no section of Thatcham Strategic Growth Study titled “Guiding Principles”, and no section that could reasonably be identified as containing them. This study is effectively the set of ideas by one consultancy about one possible configuration for a development at North East Thatcham. Totally unclear how it might be applied to a development of 1500 dwellings. The phrase “positively responded to” is completely meaningless in planning terms.

Paragraph 1.10 of the Thatcham Strategic Growth Study Stage 3 report mis-represents the involvement of Thatcham Town Council in the “community representatives’ workshop”. The Town Council’s representations to the Regulation 18 Consultation highlighted a number of errors and misleading statements in the Thatcham Strategic Growth Study

Landscape Capacity Assessment

We have reason to believe that West Berkshire Council did not commission or fund the Landscape Capacity Assessment, and David Lock Associates has a potential conflict of interest in relation to this study as had already pre-determined its view on the capacity of this site through undertaking the Thatcham Strategic Growth Study. Conclusions are inadequate to assess whether the site does indeed have a capacity of 1,500 dwellings, or how they can be distributed across the site. West Berkshire Council needs to commission a Landscape Sensitivity and Capacity Assessment that provides enough information about variability of landscape capacity across the site and its sub-components to inform a Landscape and Visual Impact Assessment (LVIA) for the site and to assess its total capacity. Amended text suggested.

Social Infrastructure

Not legally compliant as the regeneration of Thatcham Town Centre and the provision of social infrastructure should have been considered specifically in the Sustainability Appraisal.

None of the objectives in ADPP3 of the current plan has materialised, no new developments have materialised, and the Newbury Leisure Park has closed. The premise of Policy SP17 that Thatcham is able ‘to fulfil its role within the District’s

Hierarchy of Centres' is fundamentally flawed. SP17 and SA/SEA Appraisal either incorrectly assess or ignore the current level of provision of social infrastructure in Thatcham, and therefore cannot have assessed 'the area's objectively assessed need'. There needs to be a clear policy for the regeneration of Thatcham. The Infrastructure Delivery Plan is not sufficiently robust for this purpose.

Secondary Education

The viability of the provision of Secondary Education should have been considered as part of the Sustainability Appraisal for Policy SP17.

If a development of 2,500 dwellings would 'generate' sufficient pupils for a 4FE secondary school, then a development of 1,500 dwellings would only generate sufficient pupils for 2.5FE. Therefore the statement in SP17 is equivalent to providing land sufficient for a 2.5FE Secondary School. This is below the minimum viable size for a Secondary School. The provision in SP17 is in conflict with the statement that "proposals will demonstrate that these guiding principles [*of the Strategic Growth Study*] have been positively responded to"; this states that "a 6-8FE secondary is likely to be necessary". The IDP is inconsistent with SP17, which does not meet requirements of Para 95 of NPPF and is therefore completely unsound in relation to provision of secondary education.

West Berkshire Council therefore needs to review the provision of secondary education in the light of developments currently under construction in the Newbury and Thatcham area and those proposed in the LPR. To make the Local Plan Review sound, it must include the provisions for a viable secondary school.

Primary healthcare provision

Viability of the proposed GP surgery should have been considered as part of the SA/SEA. Questions whether the '450 sq. metres GP Surgery' proposed for North East Thatcham in SP17 is large enough to be viable, and concerned that the Duty to Cooperate Statement makes no mention of any discussions between West Berkshire Council and the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board. This proposed surgery is not mentioned in the Infrastructure Delivery Plan (January 2023).

Settlement boundary

Paragraph 6.58 states: "The new revised settlement boundary will be defined following the studies and work identified in the policy at the application stage." The 'red line' boundary map of the map on page 65 of the draft Local Plan is described as the "North East Thatcham Site Boundary" – i.e. the boundary of site THA20. However, this boundary has been incorrectly transferred to the Policies Map and shown in map 46: Thatcham E of the Settlement Boundary Review paper as the settlement boundary. Modification proposed to Para 6.58. The settlement boundary on the Policies Map needs to be restored to its current position, in accordance with Paragraph 6.58 of the draft Local Plan and a revision of the document 'Settlement Boundary Review (SBR) December 2022' needs to be published.

The settlement boundary to the west of Thatcham is shown incorrectly in map “Thatcham W” of the Settlement Boundary Review background paper. The settlement boundary needs to be moved to the east, so that the area of open space between Tull Way and Sowerby Street is outside the settlement boundary.

Map of North East Thatcham in policy SP17

Several inconsistencies between Policy SP17 and the map on page 65 of the draft Local Plan:

1. SP17 states that the Green Infrastructure will include “A new community park linking Thatcham to the North Wessex Downs AONB” but the map shows three small and disconnected areas described as “Country Park / Public Open Space”. These are clearly defined by the 110m AOD contour, rather than their relationship to the AONB.
2. The purpose of the car park on Harts Hill Road is unclear
3. The three areas of “Country Park / Public Open Space” and the “Green linkages between Country Park / Public Open Space” are not consistent with the description of ‘Green and Blue Infrastructure’ in paragraphs 4.8 – 4.14 of the Thatcham Strategic Growth Study Stage 3

The areas of Country Park / Public Open Space and Green Linkages need to be removed from the map on page 65, pending the completion of the ‘studies and work’ called for in Paragraph 6.58.

The ‘North East Thatcham Proposal’ layers need to be removed from the Policies Map for the time being.

Assessment of transport

If the transport assessment is “being undertaken to run concurrently with the LPR process”, then the evidence for the SA/SEA cannot have been available when Appendix 5 SA/SEA of Strategic Policies was prepared. There is no basis for conclusion of SA/SEA. The Local Plan impacts have been assessed against a Reference Case which assumes no growth (beyond the current adopted Local Plan) in housing and employment within West Berkshire, which is an unrealistic situation; there will inevitably be growth across the district, and the district is committed to deliver that growth. Therefore clear that the impact of SP23 taken with SP17 in relation to transport is negative. SA/SEA is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of NPPF. The SA/SEA needs to be reviewed in relation to transport after completion of the Strategic Transport Analysis.

There are a number of incorrect assumptions and inadequate and contradictory information (detailed in representation) in the studies on traffic and highways relating to:

- Level Crossing at Thatcham Station
- Additional journeys by non-residents of NE Thatcham
- Queues on Floral Way/Heath Lane
- Provision (or not) of through route for traffic

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| | <ul style="list-style-type: none"> • Impact of Policy ESA1 (Land east of Colthrop Industrial Estate, Thatcham) • Consistency of road and junction layout |
| Beenham Parish Council | <p>No objection in principle. Flood risk study for neighbouring sites. Infrastructure needs to be in place before housing is delivered. Identify mitigation measures for increases in traffic through Upper Bucklebury, which will in turn lead to increases of traffic in Beenham.</p> |
| Cold Ash Parish Council | <p>Cold Ash PC are concerned that impacts on the village are underestimated, particularly the transport modelling which makes too optimistic assumptions, even though their consultants still refer to 2500 dwellings on SP17 (they call THAT20). THAT20 chosen in response to constraints, rather than a balanced view of alternatives. Lack of consideration for necessary infrastructure Impact on surrounding villages and transport network Impact on Cold Ash Parish's quality of life Development size should be reduced THAT20 traffic impacts on Cold Ash are not correctly considered (accompanying report data) LPR evidence base is insufficient and the plan should be withdrawn, amended, or the housing numbers significantly reduced Consultation on the plan should be paused until the issues are rectified Loss of views Increased traffic, noise, pollution and strain on recreational facilities Concerns about long-term viability if the size is not reduced Actual numbers of housing the site is expected to deliver is unclear. HELAA – Jan 23 version states that there have been a large number of sites submitted since the last consultation that have been rejected. Councillors cannot have been aware of this as the consultation was approved in Dec 22. Air quality assessment is based on a 2037 end date, not 2039 – affects traffic modelling. Has not carried out DtC with the clinical commissioning group regarding the size of GP surgery required. Has not consulted Thames Water regarding timeframes for delivery of infrastructure – causes uncertainty regarding deliverability within the plan period. Settlement boundary has already been extended to allow for 2,500 homes, not 1,500. Provision for a secondary school is not consistent with council guidelines regarding minimum viable size, and would not be eligible for government funding. No indication of how it will be funded. IDP has omitted costs for the secondary school. Recent government changes in calculating housing need should be taken into account</p> |

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| | <p>Serious concerns about the dependability of the traffic modelling outputs. The current evidence base does not provide a solid foundation for determining the traffic impacts of Local Plan growth.</p> <p>The proposed development would impact on spatial and coalescence in the emerging Cold Ash Neighbourhood Plan. Will breach the strategic gap between Bucklebury and Thatcham. The country park will be too narrow and ineffective. Use of brownfield land has not been suitably considered – support the representations of CPRE in this regard.</p> <p>The Education Plan is contradictory and incomplete, and will fail to provide appropriate education facilities for children. If a secondary school is provided – this hasn't been considered in the traffic modelling.</p> <p>Provision for primary school education is ambiguous and contradictory.</p> <p>Education provision based on 2011 data – unacceptable.</p> <p>The proposed GP surgery should have been evaluated for viability, and should have been taken into account in the SA. Proposed a Health Impact Assessment is undertaken to assess the required size of a health facility to avoid potential risks.</p> |
| Bucklebury Parish Council | <p>Detailed representation with accompanying technical reports in relation to highways and biodiversity and ecology. LPR is not positively prepared and would not achieve goal of sustainable development.</p> <p>LPR is not justified. Reasonable alternatives have not been adequately explored and there is no basis to demonstrate that the allocation of North East Thatcham represents an appropriate strategy.</p> <p>The LPR is not effective. There is no evidence that the development of 1,500 homes at North East Thatcham is deliverable within the plan period.</p> <p>The LPR is not consistent with national policy. In many instances the allocation for development of North East Thatcham would directly conflict with national policy, particularly in relation to landscape character and impact upon the AONB.</p> <p>The process of assessing the impact of development through the sustainability appraisal is fatally flawed and process for selection of North East Thatcham as a development site is severely flawed and lacks evidence (See summary under Process)</p> <p>Illogical that Masterplanning is yet to take place for the site and that there is no vision for how the homes will be accommodated on the site.</p> <p>Community: There is no detail on the infrastructure or other facilities. Document is bereft of detail or insight into strategic healthcare planning and lack of consultation with local GP or dental practices. The provision for education from Nursery, Early Years, through Infant to Secondary education is not clearly defined within the LPR. With an apparent 40% reduction in the housing allocation in the 2023 LPR (2022 to 2039) to 1500 houses, a secondary school simply cannot be sustainable or deliverable in this location. It is also clear from the viability work that the infrastructure has not been costed adequately and there is no available evidence that the site is deliverable.</p> <p>Given that most of the site is on a gradient it is unclear how formal or informal sports provision will be brought forward on the site.</p> |

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| | <p>Green Infrastructure: Unclear why links to the AONB are being encouraged as part of the proposed allocation. Given the sensitivity of the common and the wider AONB an increase in access should not be encouraged. Given the gradient and level change across the site, it is not considered that a comprehensive network of cycle paths or walking routes could be delivered.</p> <p>Transport: significant concern that the evidence base for trip rates and trip distribution is highly flawed and mitigation measures will not be successful. The highway network in the vicinity of North East Thatcham is already over capacity and development of this scale will lead to severe traffic impact which would breach the threshold set out in paragraph 111 of the NPPF.</p> <p>Sustainability: Concerns that WBC has failed to properly address the impacts on climate change and flood risk. No evidence that a net zero carbon development would be viable or has been costed as part of the viability appraisal. Flood risk and sustainable drainage not adequately considered. Oil Pipeline could lead to significant impediments to the implementation of any development on the site.</p> <p>Landscape and Character Impact: Objections regarding damage to the Common, greenfield development in AONB setting and poor excuse of a 'country park'.</p> <ul style="list-style-type: none"> • Damage to Bucklebury Common: Key part of the Bucklebury vision for the Common to not increase the number of visitors - the proposed development represents an additional 4000+ people being actively encouraged into the AONB, which includes the irreplaceable habitats found in Bucklebury Common. • The AONB board objects to the concept of a country park in close proximity to the AONB. A carpark has been provided to attract users to the country park, but this is counter intuitive to the need to protect the Common and the wider AONB. <p>Ecology and Biodiversity Impact: No evidence that the impact has been taken into account by WBC in the selection of the allocation site. Not embedded biodiversity as part of the plan and have instead chosen to leave this to the application stages. The area has a much higher biodiversity value than assessed by WBC. Technical report on biodiversity attached to representation.</p> <p>Heritage Impact: No evidence that taken account of setting or significance of Colthrop Manor. Consideration of heritage impact should have been undertaken as part of the site selection process and subsequent assessment of site capacity.</p> <p>Water Supply and Foul Drainage: Lack of evidence or supporting information on how the developers of North East Thatcham will achieve water usage 110 litres/person/day. The existing sewers and infrastructure feeding Lower Way are a real matter for concern. The LPR does not mention any improvements to the existing sewage network or planning provision for new treatment sites</p> |
| Environment Agency | This allocation which is for approximately 1,500 dwellings which will be completed within the period of the Plan has not considered/listed some environmental constraints and highlighted requirements and opportunities to ensure the sustainable delivery of the site as required by national policy. |

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| | <p>Requirements: There should be no penetration of the London Clay strata. No discharge into groundwater and information should be provided to demonstrate this.</p> <p>The site contains an area which is an existing flood defence, recently completed by WBC (Dunston Park Flood Storage Area). The existing and planned surface water schemes should be mentioned in this section, including the need for consideration of these schemes in a comprehensive flood risk assessment when planning development in this area. This site would require a Flood Risk Assessment which demonstrates requirements of NPPF and PPG.</p> <p>Opportunities: There may be opportunities to enhance the river corridor which would contribute to biodiversity net gain.</p> |
| Thames Water | Development likely to require upgrades to the water supply and wastewater networks, including sewerage treatment infrastructure. |
| Historic England | <p>Final sentence of the first paragraph does not make sense and needs to be revised.</p> <p>Thatcham Strategic Growth Study's consideration of the historic environment is limited and therefore its principles will only have limited applicability to heritage issues.</p> <p>Support requirement for a historic environment strategy but advise broadening the scope beyond listed buildings and more detail on what this should entail is required. This would support effective place-shaping and enhance local character.</p> <p>The HELAA site assessment recommends some archaeological work to be undertaken for different sites in SP17, but this is not included in the policy – without this the policy is unsound.</p> <p>Alternative policy wording provided.</p> |

General Consultation Bodies:

| Consultee | Main issues |
|-----------|--|
| BBOWT | <p>The size of the site and distance from Kennet & Lambourn Floodplain SAC would trigger need for an HRA. The site wasn't included in the HRA for the Core Strategy, so there is no clear evidence that the allocation would not have a significant impact on the SAC.</p> <p>The site borders six Local Wildlife Sites, most of which are designated ancient woodland and also borders UKBAP habitats. Risk that these will be damaged by the development.</p> <p>Would like to see provision of recreational greenspace to displace pressure on these habitats.</p> <p>Cannot find ecological surveys to understand the impacts on protected sites and species, in conflict with NPPF para 158. If there are no assessments the allocations could be found unsound.</p> <p>Biodiversity has not been sufficiently considered in allocating this site and it is not evidenced that the site will not have a significant impact.</p> |

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| North Wessex Downs AONB | <p>Key that delivery is led by a masterplan set by the LPA and not the developer. This should be adopted as an SPD so that the policy cannot later be ‘watered down’ by developers.</p> <p>A country park would not promote access to the AONB, but only attract dog walkers into this landscape – this could be a conflict.</p> <p>The skyline is most sensitive to change, but there is opportunity to enhance this and the landscape character. The country park should be a local asset that enhances the setting of the AONB.</p> |
| Berkshire, Oxfordshire and Buckinghamshire Integrated Care Board (BOB) | <p>The policy states that ‘450 sq m of GP surgery is to be offered to BOB ICB or such appropriate body’. Unclear whether this will be fully operational and functional at nil cost, or subject to payment of rent, whether a carpark is to be provided, how large the site would be. More detail required.</p> <p>If subject to rent, this would not be acceptable. If nil cost this is encouraging, but still not enough to be sustainable and would be too small to operate effectively.</p> <p>Better mitigation for the additional demand is a significantly larger GP premises (minimum 1,000m²), subject to commissioner funding being available for the balance.</p> <p>The £450m² development would cost approx. £3m to build</p> <p>The proposed development should donate the site for the larger facility (part of the £3m contribution), and a capital contribution.</p> <p>The LPR should include these requirements.</p> |
| Burdwood Surgery | <p>Burdwood surgery is currently full and could not take on the development patients as it stands</p> <p>Appropriate additional health care provision must be present in the proposal for it to proceed</p> <p>Burdwood Surgery could relocate in a new facility in the development</p> <p>Burdwood Surgery proposal encompasses a thirty year health care planning horizon</p> <p>Burdwood Surgery is one of the three local General Practice providers affected by the planned development of 1,500 residential units in this North East Thatcham planning consultation.</p> <p>Burdwood Surgery is a three partner PMS primary care practice serving a population of 10,250 patients in the locality. The surgery has a CQC rating of good and a Patient Survey satisfaction level of 92%. The surgery is currently operating at 91% room occupancy which is above its planned capacity utilisation of 80% which is already limiting the ability to bring in new staff to create new patient capacity. The surgery has completed two clinical extensions since its original build and now fully occupies its footprint. Surgery additional patient facing resources and services are now severely curtailed due to space.</p> <p>The Burdwood site limits the integrated health and social care working potential of the Surgery for its population. The increasing healthcare needs of the ageing population and the NHS policy shift to more care being delivered through General Practice settings mean that going forward, due to space constraints at the practice, care capacity and care quality are likely to be under extreme pressure, even without population growth. Our proposal to solve this is a new site on which to relocate Burdwood Surgery. We would not support a Burdwood satellite site on the new housing development, as a satellite site is not economically feasible, nor in line with NHS best practice. The existing Burdwood</p> |

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| | <p>team plus additional clinical resources would relocate to the new facility. The existing facility would be sold and or exchanged for the new facility as part of the consideration.</p> <p>A new site would facilitate space for an enlarged team which would fit with the policy direction for more preventative care and care in the community. Over the last ten years Burdwood Surgery has had to move towards only housing it's directly employed staff; this is to the detriment of its patients who then do not have the same access to the allied professionals for their wider care. The shortage of space has been partially mitigated by technology and remote working, including remote consultations, but this leads to sub optimal surgery resource deployment. Further significant increases in utilisation of remote working would not be in line with best medical practice and would also likely make Burdwood Surgery a target of media/NHS management pressure based on rates of consultation done 'in person'.</p> <p>We have considered alternative approaches that have been suggested to us, such as moving most of our non-clinical staff off site to create more consultation space. We strongly disagree with this idea as we do not believe that our clinicians can function optimally without the dynamic and close relationships we have with our support team. We believe the high patient satisfaction we have, is in large part due to our excellent wider team.</p> <p>The new facility would be modelled on the existing ethos of the Burdwood Surgery namely, doctor led with an aim for continuity of care and an overall aim of being a practice we would be happy for our own families to be treated at. Based on the above the new facility would be a minimum of approximately 1200m² potentially across two floors as this works successfully currently and the enhanced footprint would meet future needs. Suggested capacity consideration also encompasses current undelivered services not offered at the practice due to space constraints such as: smoking cessation, alcohol dependency, Citizen's Advice, mental health clinics, physiotherapy and group consultations. The new facility would bolster the capacity for the wider Kennet PCN. The new surgery would successfully model and conform to the integrated health care structure and direction of the Buckinghamshire, Oxfordshire and West Berkshire Integrated Care Partnership Strategic Priorities December 2022. The facility would also encompass the NHS Green Practice zero emissions goal protocols consistent with the North East Thatcham Development Plan.</p> <p>In short, at Burdwood Surgery, we believe we are already at or beyond our patient capacity (especially when considering the growing needs of this group as they age). The practice was designed for 7000 patients using the standards of around 40 years ago when consultation rates were a fraction of what they are now. We do not have the ability to safely take on more patients from a new housing development on our current site. We need either a new site, or a guarantee that the new people arriving would not come under our care. In our opinion, to not do either of these things would jeopardise patient safety and quality of care locally.</p> <p>Accordingly, Burdwood Surgery believes for the above reasons the plan to be unsound in relation to SP17, the North East Thatcham development. Burdwood Surgery thus requests either an assurance that none of the residents from the new development will be included in the Burdwood Surgery catchment area or a new surgery is provided of circa 1200 m².</p> |
| Thatcham Medical Practice | The predicted increase in patient population as a result of new housing developments would not be manageable in the absence of further premises development. |

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| | <p>450m² would only be sufficient for a satellite site, or a hub, which we would not support – it would not be financially viable to run.</p> <p>With appropriate funding, the existing site could be remodelled to accommodate the additional development.</p> <p>Thatcham medical practice would like more investment to support the proposal but would not operate the proposed medical facility in SP17.</p> |
| Campaign to Protect Rural England (CPRE) | <p>Concern regarding the proximity to the AONB.</p> <p>Significantly damaging to the countryside.</p> <p>Unsuitable due to poor infrastructure.</p> <p>Unnecessary destruction of landscape and greenfields.</p> <p>Site is unnecessary, contrary to national planning policy and will cause disruption and harm to the AONB.</p> <p>Source of light pollution to the AONB.</p> <p>Policy changes mean that housing numbers can be reduced where there are significant impacts on the landscape – this should be done.</p> |
| Network Rail | <p>Any traffic travelling to or from Thatcham from the south will have to use the Thatcham level crossing.</p> <p>The use of this crossing already causes significant traffic delays and queues and Network Rail often receive complaints.</p> <p>This allocation will exacerbate the situation.</p> <p>The Thatcham Strategic Growth Study has concluded that to provide an overbridge would result in increases of traffic that would be unsustainable for Crookham Hill.</p> <p>The LPR should include a viability assessment including a bridge to replace the Thatcham Level Crossing to ensure the development provides the required infrastructure and mitigate any adverse impacts.</p> <p>SP17 should be altered to include mitigation of impacts on the highway network.</p> <p>Without an alternative to the Thatcham level crossing, policy SP17 would not accord with DM42 g which requires new developments to improve safety and operational capacity of the local road network.</p> |
| Newbury District Ornithological Club | <p>Lack of strategic gap between Thatcham and Bucklebury, merging the two and Bucklebury will lose its identity.</p> <p>Recreational damage to Bucklebury Common</p> <p>Greenfield development abutting the AONB with no evidence or strategy for positive impact and overall biodiversity gain.</p> <p>Damage to Bucklebury Plateau Biodiversity Opportunity Area, ancient woodlands, wildlife and the Common.</p> <p>Provisions for green space cannot meet demand – will create recreational pressure on surrounding areas, including the AONB.</p> <p>Country Park definition not met - the three small, isolated areas ('community parks') have no meaningful environmental value and may be subsequently developed.</p> <p>Unacceptable pressure on already oversubscribed secondary schools e.g. Kennet. Number of additional educational places at all levels has not been stated and there is a lack of a coherent plan for education facilities.</p> <p>Sports Field provision is mentioned, but the only flat ground is closest to the A4 and therefore the most polluted. There is also no funding earmarked for these facilities. School playing fields are not suitable/available as sports fields.</p> |

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| | <p>Severe increase in traffic in Upper Bucklebury and other villages. New roundabout and carpark on Hartshill inappropriate. No modelling for Hatshill junction included in the Transport Assessment. Additional congestion on A4. Unacceptable pressure on healthcare services – should include a Health Impact Assessment. 4 450m² primary healthcare facility is inadequate and may be better located in the centre of Thatcham to minimise travel. No evidence the allocation will have a positive effect on the environment, only a significant negative effect. A 'Sustainability Charter' and underlying strategy documents are mentioned but are not available. SA identifies a negative impact on environmental sustainability but there are no specific mitigation measures specified. SA identifies an overall positive impact on sustainability by ignoring impacts on the environment and favouring economic and social impacts which are highly questionable.</p> |
| Woodland Trust | <p>The site is adjacent to ancient woodland but there is no specific wording to require protection – not legally compliant or sound. Wording should be amended to require appropriate buffers for ancient woodland – revised policy wording provided.</p> |

Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | <p>Strongly object <u>Environment</u> Impact on wildlife and biodiversity - loss of habitat and reduction in much needed farmland in the area. Thorough ecological assessment should be completed before outline permission granted. 'Swallowing up' Upper Bucklebury, Cause harm to the rare heathland and it's associated wildlife species mainly by dog walking, There should have been a more detailed ecological study of the site before it was allocated, it may be more ecologically important than first thought. Badgers have been seen foraging on the site as well as Lapwing. This is a strategic gap between Thatcham and Bucklebury. Harmful to the AONB and wildlife. Damage the dark sky above the area. No environmental research done so far. You will be creating more flooding in an area that is already prone to flooding, water naturally flows down the escarpment from the AONB through Thatcham to the Kennett canal.</p> |

Increased footfall will harm the ancient woodlands.
 There may be Great Crested Newts affected by the development and a licence may be needed if they are impacted.
 Increased effluent discharge into the river Kennett.
 The proposed country park has no environmental value.
 There is no 'strategic gap' between Bucklebury and Thatcham.
 The pollution of light and noise, along with the added car fumes of possibly 5,000 more cars crawling along the already congested, slow moving, one lane A4 is just showing a complete lack of empathy for the residents and wildlife of the area.
 Biodiversity net gain has not been considered or demonstrated.
 There is also failure to deal with whole life of the proposal, carbon calculation or offsetting.
 The site will be extremely visible from the southern side of the valley.
 Amenity space must be provided.
 Concern about archaeology which might be disturbed.

Infrastructure

Local infrastructure will not be able to cope.
 Additional GP surgeries are not part of the NHS strategy. Provision of GP practices - no view of any form of discussion with healthcare providers over the correct need.
 Insufficient capacity at Kennet school. School provision has not been costed. Plans for education facilities should be reconsidered in light of the government's advice and that of WBC.
 Infrastructure in Thatcham is overloaded, for example the Kennett school, other infrastructure cannot cope and in need of improvement first.
 There are no banks and not enough nurses to care for the elderly, the chemist is only small, the doctors are also oversubscribed.
 The developer will wish to utilise the area originally designated to build the remaining 1000 after this LPR plan period finishes - huge impact as the provision of schools etc are dependent on the full number of houses and no longer clear that any provision for schooling will be made.
 There has been no Health Impact Assessment for the development and therefore to accurately meet health needs.
 Difficult to get dentists in Thatcham already.
 The sewage treatment works in Thatcham is failing and cannot cope with the new development and there is nowhere for it to expand, this could lead to increased raw sewage being pumped into the River Kennett.
 Burdwood Surgery do not have the capacity to take on any patients from the site, they would like a new 1,200 sq m facility to improve their practice and serve the new development, it is unviable to operate a small 450 sq m satellite facility.
 Would impact the local reservoirs and increase the impact on the local treatment areas

Traffic and Transport

Will increase traffic congestion.

Thatcham railway crossing not fit now let alone with extra traffic generated.

Congestion on Tull Way to Floral Way resulting in people diverting to unsuitable rural roads

Broad Lane in Upper Bucklebury already has too much traffic.

Hart Hill road is very dangerous and gets flooded regularly as well as icy this results in many accidents which will get worse due to increased traffic.

The increased traffic would pose a risk to children walking to school particularly where there is no pavement in winter.

Most definitely require a railway bridge in Thatcham and a north Thatcham bypass.

There are many poorly maintained narrow lanes which cannot cope with the additional traffic in Upper Bucklebury.

People will need to commute out of the area to get work as there are not enough jobs locally and the station car park is full already and cannot expand.

SA/SEA

This makes a mockery of the SA/SEA which says NET would have a positive impact on road safety and delivering sustainable transport.

Other Matters

To enlarge Thatcham by 1500 to a potential 2500 would mean Thatcham, Newbury and local villages like Cold Ash and Upper Bucklebury run one into another. Will add a small town onto the north east of Thatcham.

Triple the number of houses that should be considered for such a space.

Brownfield land should be developed first particularly in Newbury where there are better sustainable transport links.

The number and type of houses far exceeds the need of the area.

It is unlikely that the number of dwellings will stop at 1,500.

There is no mention of secure large van parking.

It is too close to AWE for safety.

The comments in Michael Gove's letter concerning housing need should be acted upon.

Sites like Seigecroft should be developed instead.

The proposal will lead to less social diversity and more homogeneity.

There is a significant reduction in the viability of the site when the housing numbers are reduced and this has not been taken into account, eg the Thatcham growth study.

Concerning that the provision has reduced from 2,500 to 1,500 without clear reasoning.

Highlights a need for further, less complex small-medium sites to be allocated. There are 2 pipe lines across the site which need safeguarding areas, limiting it's potential.

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| | <p>50% must be social housing, and should not just be flats. The housing mix is wrong, there need to be more 3 and 4 bed properties to reflect local need, and people working from home as a 2 bed is really a 1 bed plus office. Much evidence is missing for this strategic site.</p> |
| Simon Pike | <p>SA/SEA re. number of homes not legally compliant - no explanation as to why other alternatives with fewer than 1,500 homes were not considered. Lack of clarity and ambiguity regarding final numbers on site. Ambiguous use of the word “will” and other ambiguities. Suggested changes supplied. Thatcham Strategic Growth Study: lack of clarity and ambiguity. Same comments as for Thatcham Town Council. Results of community representatives’ workshop cannot be taken as a considered view of the Council or of the community. The Thatcham Strategic Growth Study needs to be reviewed for a development of 1500 dwellings, and the resulting ‘guiding principles’ then need to be incorporated into the draft Local Plan or a supplementary planning document. This then needs to undergo public consultation in accordance with the Statement of Community Involvement. RE. Landscape Capacity Assessment, David Lock Associates has a potential conflict of interest in relation to this study; it had already pre-determined its view on the capacity of this site through undertaking the TSGS for 2,500 dwellings. Requiring the Landscape Capacity Assessment not to be broken down into individual parcels of land masks the proportion of the site that is suitable for development, and therefore its capacity. Until there has been a quantitative Landscape Capacity Assessment for the site, Policy SP17 should not specify a number of dwellings. Paras 6.52 and 6.53. The regeneration of Thatcham Town Centre and the provision of social infrastructure in the town are recognised as important. These should therefore have been considered specifically in the Sustainability Appraisal. The SA either incorrectly assess or ignore the current level of provision of social infrastructure in Thatcham, and therefore cannot have assessed ‘the area’s objectively assessed need’. There needs to be a clear policy for the regeneration of Thatcham, and in particular its social infrastructure. This needs to include a schedule of what must be completed in advance of any further housing development or at specified stages of construction West Berkshire Strategic Vision. Commissioned in response to new requirement in paragraph 22 of NPPF. However, there is no mention whatsoever of this visioning work in the LPR Nothing in LPR looks beyond the end of the next plan period in 2039. Settlement boundary: Paragraph 6.58 of the draft LPR states: “The new revised settlement boundary will be defined following the studies and work identified in the policy at the application stage.” Boundary of site THA20 has been incorrectly transferred to the Policies Map as the settlement boundary Para 6.58 needs to be modified and settlement boundary restored to current position. If Examination concludes that it is appropriate to extend the settlement boundary should certainly not extend above the 95m contour, and probably not above the 90m contour, in accordance with the best available evidence on landscape. Level crossing at Thatcham station leads to serious congestion. Not built into WSP model and clear that any</p> |

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| | <p>increase in housing in Thatcham will result in a corresponding increase in traffic over the level crossing The future Strategic Transport Assessment should take into account the delays due to the level crossing and the traffic studies necessary for this should be carried out.</p> |
| Liberal Democrat Group | <p>We agree with TTC that, for a variety of reasons under the tests for Soundness, SP17 fails on many issues as described in their response. Do not consider complies with DtC as lack of evidence that the primary healthcare authorities have been adequately consulted and not convinced from DtC Statement that National Highways, Thames Water, or Natural England have responded. This makes the submission premature.</p> |
| West Berkshire Green Party | <p>The two large developments on greenfield sites are not consistent with the NPPF and contradict many parts of the plan. They are also not deliverable within the plan period.</p> |
| Cllr Alan Macro | <p>The proposal to allocate a 1,500 homes strategic housing allocation at NE Thatcham risks "putting all eggs in one basket" making it subject to risks such as have been experienced with the strategic allocation at Sandford. Paragraph 6.58: The statement "<i>the new revised settlement boundary will be defined following the studies and work identified in the policy at the application stage</i>" leaves an unacceptably large degree of uncertainty. It would also make it difficult to resist planning applications that would take the number of dwellings on the site past the 1,500 specified in this LPR. The new settlement boundary should be drawn in the LPR.</p> <p>Air Quality Assessment and Transport Model have not been revised to take account of the change in the number of dwellings in the plan period from 1,250 to 1,500. Transport Model should be re-run with population based on the 2021 census and required mitigations reviewed (representation includes some detailed comments on Transport Model)</p> <p>The proposed site is some distance from the town centre and the railway station. This means that journeys are much more likely to be made using private cars. This site is not therefore sustainable. Questions assessment in SA/SEA.</p> <p>This proposed strategic housing allocation would adversely affect Theale as it would greatly increase the level of traffic on the A4 past the village</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| <p>Southern Planning Practice for Saunders Family</p> | <p>Concerning that the provision has reduced from 2,500 to 1,500 without clear reasoning. Highlights a need for further, less complex small-medium sites to be allocated.</p> |
| <p>Lichfields on behalf of “the Partnership,” a Partnership comprising A2Dominion, Catesby Estates, Donnington New Homes and Ptarmigan Land.</p> | <p>Representation on behalf of promoters of North East Thatcham (NET). The overarching approach of the Local Plan in selecting Thatcham for large-scale housing growth and in focusing this expansion at NET is sound. However, some individual elements of the policy require modification to be made sound and meet the tests of the NPPF.</p> <p>The Scale of Development The Thatcham Strategic Growth Study (TSGS) concluded that only growth of a strategic scale could support the service provision and regeneration that Thatcham requires and sets out that NET has the potential to accommodate up to 2,500 new homes. The emerging conclusions of masterplanning and feasibility work by the Partnership is that the site has a minimum estimated yield of around 2,275 dwellings, with a theoretical maximum of 2,670 alongside proposals for two primary schools, a secondary school and other associated infrastructure. Council’s evidence, including SA/SEA, to date does not support the reduced number now proposed. Precisely how many homes would come forward on the site will need to be established through further detailed technical work, required by SP17, yet the ability to bring forward an increased number would now be limited by the current wording of the policy, contrary to its evidence base. It is important that Policy SP17 therefore retains a degree of flexibility The Indicative Site Plan should be limited to a red line site plan that clearly shows the extent of the wider allocation but without imposing limits that are unevidenced and unjustified, and which pre-empt further masterplanning and technical work that can provide assurance that the potential of the site is achieved, whilst ensuring LVIA and other relevant matters are properly protected. Not consistent with NPPF paragraphs 124, 16,22 and 73. The solution is to change the wording of the policy so that rather than referring to “<i>approximately 1,500 homes</i>” it instead refers to “<i>a minimum of 1,500 homes</i>”. A consequential change would also be required to Policy SP13</p> <p>Housing Mix SP17 does not provide the flexibility outlined in SP18, point b which allows for schemes to have some flexibility for variation from the prescribed strategic level mix in Table 3. There needs to be the ability to set an appropriate NET-specific mix to respond to wider considerations such as market need and viability as well as site planning and design issues across the whole site and within individual phases</p> <p>The scale of community uses on the site It is premature to specify the quantum of some of the provision ahead of the capacity of the site being determined through the masterplanning and LVIA exercise specified in the Policy. The current scales of provision are not justified with reference to the evidence base and given that scale of development and thus need of population is not yet fixed.</p> |

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| | <p>The new community park and the AONB</p> <p>Support the concept of a new community park, but concerned at the reference in the policy to it “<i>linking Thatcham to the North Wessex Downs AONB</i>”. The boundary of the AONB and the NET allocation are not contiguous, so it is not clear how this objective could be delivered within the site allocation. The objective of ensuring the connections through the site support access to the AONB is in any event secured by the second bullet point listed under the policies ‘Green Infrastructure’ heading.</p> <p>Representation contains suggested amended wording for SP17 to make the plan sound.</p> |
| <p>Pro Vision for</p> <ul style="list-style-type: none"> • Newbury Racecourse Plc. • Rivar Ltd. | <p>It is considered that the housing delivery of 1,500 dwellings at NE Thatcham during the plan period is questionable. Further evidence is required to justify the allocation, particularly given the reduction to 1,500 new homes and the potential lack of delivery of a secondary school.</p> <p>The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years and a realistic average annual build out rate is c.100-120 dpa.</p> |
| <p>ET Planning for Messers. Marriage</p> | <p>Policy is welcomed.</p> <p>Particularly supportive of policy recognition for the need for green infrastructure specifically for the site.</p> <p>THA22 – given the site’s close proximity to the proposed residential development in SP17, it should be included within the site allocation in order to be masterplanned to provide biodiversity net gain and/or green infrastructure for the wider allocation. Telecommunications infrastructure could also be hosted on the site.</p> <p>THA22 was only recently included in the HELAA and was not properly assessed, therefore not consistent with NPPF 35 b).</p> |
| <p>Turley for Hathor Property</p> | <p>Whilst it is acknowledged that the scale of the development proposed does offer the opportunity of providing some infrastructure, the Council have conceded level of infrastructure has been reduced, and therefore the extent of the sustainability advantages it could provide have been watered down. Clear that if confirmed the allocation will not be delivered within the short-medium term of the LPR period.</p> |
| <p>TOWN for landowners of Land East of Pincents Lane</p> | <p>Inconceivable that the allocation at NE Thatcham could be delivered within the timescale of the LPR to 2039. A more prudent allocation, based on the national studies, would be 1,000 units within the plan period, which could be reviewed in five years.</p> |
| <p>Cunnane Town Planning LLP for Colthrop Village Consortium</p> | <p>Representation re. Colthrop Village.</p> <p>Not legally compliant as fails to discharge the duty to cooperate by not consulting Thames Water regarding the time needed for the provision of water and foul drainage for the proposed housing.</p> <p>The settlement boundary is incorrectly drawn.</p> <p>The Plan does not take into account other reasonable alternatives such as Colthrop Village. The allocation is not supported by adequate infrastructure provision to ensure delivery.</p> <p>Propose the deletion of the SP17 allocation and the allocation of Colthrop Village as a more sustainable alternative.</p> <p>Site details and assessments included in representation.</p> |

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| <p>Nexus Planning for Croudace Homes</p> | <p>Representation re. Land at Henwick Park. Generally support the direction of a large amount of growth the Thatcham. Ongoing concerns regarding the deliverability and developability of North East Thatcham. The Council should allocate smaller, unconstrained sites which can come forward earlier in the plan period to aid housing supply. Should NE Thatcham remain, there is still a need for other sites in/near Thatcham to relieve pressure on supply in other areas of the district, and provide flexibility for this ‘top tier’ settlement in the earlier part of the plan period. Henwick Park should be one such site. The proposed housing number has reduced, but the allocation boundary has not been amended. Therefore object, as the settlement boundary will also likely be extended, and the site could deliver more homes than anticipated, if it does come forward. The site is not expected to deliver within the first 5 years of the plan period, therefore is it not deliverable in line with NPPF definition. Unrealistic for the site to deliver 150 units in the first year (2029/2030), given the significant enabling works that needs to occur first. The trajectory should be amended to show more realistic delivery rates. This could lead to a shortfall in supply, and delay delivery of affordable housing. Unrealistic starting date for the development based on other evidence, and even the Sandleford Park Allocation. An SPD will add further delays, if required. Concerning that the Council is relying on these two strategic sites to deliver 70% of allocations and 32% of supply over the plan period. This is a high risk strategy. The LPR should be allocating a range of additional sites to allow flexibility and certainty in supply.</p> |
| <p>Iver Consulting Ltd. for Prosper Infinity</p> | <p>Representation regarding Newbury Leisure Park: There should be a proper review of Brownfield sites, which should be brought forward before release of greenfield land, such as NE Thatcham. Particularly so when there are brownfield sites that are vacant and available for development such as Newbury Leisure Park.</p> |

Summary of main issues raised:

There were a very large number of objections to this site, particularly from local residents, covering a range of issues but largely around the environmental impact of the proposal and the impact on local infrastructure.

Bucklebury Parish Council and Thatcham Town Council in particular made extensive comments on the policy and raised particular concerns.

- SA/SEA – not all reasonable alternatives have been considered, and there is a lack of justification for the reduction in the number of dwellings.

- Brownfield and other sites, particularly in Newbury, should have been considered first not North East Thatcham
- Housing numbers - the policy lacks clarity on the final number to be accommodated on site
- Deliverability of 1500 dwellings within the plan period is questioned by a number of consultees.
- Status of Thatcham Strategic Growth Study (TSGS) – it is unclear how the principles are to be applied to the 1,500 development and what weight can be attached to the TSGS
- Provision for secondary school, health provision and other infrastructure. It is apparent that the level of infrastructure has been reduced, and therefore the extent of the sustainability advantages of the site have been watered down.
- Landscape impact – the impact on Bucklebury Common and the wider AONB and question links to AONB given the sensitivity of the landscape
- Further more detailed work needs to be done on the potential landscape and visual impact of the proposed development before the planning application stage
- Community park - the value of three small, isolated areas is questioned.
- Further work is needed on the heritage impact (Historic England)
- Impact on biodiversity.
- Settlement boundary – question whether the settlement boundary should be shown as the site boundary before further masterplanning work is carried out.
- Traffic impact both in terms of volume and the rural character of roads in the parishes of Bucklebury, Cold Ash and Midgham but also the exacerbation of congestion issues relating to level crossing in Thatcham
- The aquifers and the groundwater should be protected and the existing and proposed flood defence schemes on the site should be considered in a flood risk assessment (Environment Agency)
- No reference is made to West Berkshire Strategic Vision which was commissioned to meet requirements of NPPF paragraph 22. Nothing in LPR looks beyond end of the plan period.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP18 Housing type and mix

Number of representations received: 16

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
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| Reading Borough Council (RBC) | This policy seeks a mix of different sizes of homes based on updated Strategic Housing Market Assessment work. The need for homes in Reading is for approximately 50% 3-bed or larger, but the actual delivery is very significantly below this due to the realities of the types of site that come forward, where much of the delivery is at high density in the town centre. This will mean a need to place further emphasis on delivering family accommodation in adjoining areas, particularly where those areas are within the wider Reading urban area. Suggested additional bullet point in paragraph 6.66. |
| Holybrook Parish Council | Welcome the statement regarding delivery of accessible and adaptable dwelling in accordance with Building Regulations M4(2) and would like to see this strengthened to include change of use - vital that accessibility formulates part of the planning proposals. |

General Consultation Bodies:

| Consultee | Main issues |
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| Home Builders Federation | Given the likelihood that the Government will make M4(2) the mandatory standard we would recommend that the Council amend its policy accordingly to ensure no unnecessary repetition of building regulations within planning policy. With regard to option standard for wheelchair accessible housing set out in part M4(3) we are concerned that the requirement for 10% of market housing and a maximum of five affordable units are built to this standard is not supported by the Council's evidence. Policy also lacks clarity as to what is required of an applicant with regard to the provision of M4(3) in market housing |

Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | Lack of substantive detail and assumed that new estates will be high profit mix of executive and middle management houses. The biggest requirement must be affordable and social housing. Experience shows that the number of these reduce with developers arguing unforeseen profitability problems, WBC roll over and a reduction in number is agreed. Policy also needs to ensure a sufficient supply of adapted housing. People are having to alter new housing which is inefficient. Thatcham already has high numbers of social housing, so the housing mix should equalise this disparity and create a higher percentage of family homes. Needs to be a higher proportion of 3-4 bedroom homes to allow for home-working. |
| Cllr Alan Macro | Support policy in general, but object to the statement “ <i>Around 10% of the new market housing and a maximum of 5 units of the affordable sector should also meet the wheelchair accessible standard M4(3) wheelchair user dwellings...</i> ”. The word “around” is far too vague and the reason for “a maximum of 5 units” is difficult to justify. |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Ridgepoint Homes | Disagree with the requirement for market dwelling of 10 or more to reflect the mix set out in Table 3. The mix should be determined by current market preferences as well as the location and size of the site (in line with points a-d of the policy). Suggest Table 3 only applies to affordable housing, and points a-d in the policy remain as the considerations for market housing. Disagree with the requirement for 10% of market units to be designed to M4(3) standards regarding accessible and adaptable dwellings, which is an optional standard and should only apply on a site-by-site basis to reflect local need and demand. Suggest the requirement is deleted. |
| Abri Group (Housing Association) | 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. Suggested modifications in representation. The update to Table 3, now including recommended housing mix split by different affordable housing tenures is supported. |
| Solve Planning for Harry West Investments Ltd. | Support SP18 and SP19 along with DM 16 – DM19 which seek to provide a good mix of housing types. |

| Consultee | Main issues |
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| Pegasus Group on behalf of Donnington New Homes | Policy requires 10% market dwellings, and 5 affordable units, to be Building Regulations Part M4(3) compliant. It is unnecessary to repeat Building Regulation requirements within Planning Policy and, accordingly, the policy should be amended to delete this requirement. |
| Boyer Planning obo <ul style="list-style-type: none"> • Sovereign • Darcliffes Homes | Delivery of dwellings to M4(3) standard may not be reasonably practicable in all cases and amendment suggested. |
| White Peak Planning Ltd obo Bloor Homes Ltd | Support. Reference to site specific viability (Criterion D) is welcomed. |
| Tim North & Associates Ltd. | <p>The plan is not sound in its approach to specialist older person's accommodation – SP18, DM1, DM4 and particularly DM19.</p> <p>Ensuring future housing supply is met on the basis of 'Lifetime Homes Standards' will not in itself be sufficient to meet the accommodation requirements of various types of specialist older households.</p> <p>Material considerations affecting the specialist older person's accommodation have not been fully considered in the LPR. The UK population is ageing and the trend is expected to grow.</p> <p>NPPF 63 requires the LPA to consider the size, type and tenure of housing needed for older people.</p> <p>The evidence for the LPR indicates a need for 1,710 units but the only specialist older person's accommodation is an extra care scheme at Stonehams Farm, which doesn't match historic completions.</p> <p>Further allocations should be made for specialist older persons housing, or flexible provision should be made in DM1. It is not considered that the market can be fully relied upon to meet the outstanding need.</p> <p>A more flexible approach is needed, and emphasis on ensuring requirements are met.</p> <p>Requirement to look at need for specialist housing for older people based on an appropriate standard room with separate wash facilities as communal facilities are no longer appropriate post Covid-19.</p> |
| The Planning Bureau for McCarthy Stone | <p>This policy should be amended to emphasise the need for specialist housing for older people.</p> <p>Requirement for 10% of new schemes to be M4(3) standard has been assessed as unviable and should therefore be removed.</p> <p>Ensuring people stay in their homes for longer through the provision of wheelchair housing is not, in itself sufficient to meet the housing needs of older people. Although it can assist in meeting the need, it does not remove the need for specific older persons housing.</p> <p>Reference to M4(2) should also be removed.</p> <p>Suggested policy wording provided.</p> |
| Nexus Planning for Croudace Homes | Encouraged to see that Policy SP18 (Housing Type and Mix) outlines support for the principle of self and custom-build housing, but considers that in order to be sound, the LPR should either allocate or ensure that development is obliged to deliver an element of self and custom-build housing to ensure needs are met. |

| Consultee | Main issues |
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| | Croudace urges the Council to explicitly and more seriously address the requirement in relation to specialist housing, especially for older people, by ensuring that planning policies contain a clear recognition of how needs for specialist housing will be delivered. |

Summary of issues raised:

Some support for the policy with some suggested amendments.

The main issues raised include:

- Need to place further emphasis on delivering family accommodation in areas adjoining Reading due to much of the delivery in Reading being at high density in the town centre.
- Recommend that the Council amend its policy to ensure no unnecessary repetition of building regulations.
- Concern that the requirement regarding M4(3) is not supported by the Council's evidence. It is an optional standard and should only apply on a site-by-site basis to reflect local need and demand. Needs clarity on whether applies to major development only.
- Objection to mix in Table 3 and suggestion should apply only to affordable housing.
- Material considerations affecting the specialist older person's accommodation have not been fully considered. NPPF 63 requires the LPA to consider the size, type and tenure of housing needed for older people. Further allocations should be made for specialist older persons housing, or flexible provision should be made in DM1.
- The LPR should either allocate or ensure that development is obliged to deliver an element of self and custom-build housing to ensure needs are met.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP19 Affordable Housing

Number of representations received: 19

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|-------------------------------|---|
| Reading Borough Council (RBC) | RBC welcomes the proposal to require significant levels of affordable housing on development sites. Delivering as much affordable housing within the plan area as possible will avoid placing undue burdens on neighbouring authorities. RBC particularly supports the proposal to seek affordable housing on sites of below 10 dwellings. The Reading Borough Local Plan seeks an affordable housing contribution on all sizes of sites due to the exceptional pressures on affordability in the local area, and this will no doubt equally apply to West Berkshire. Based on our experience, sites of 1-4 dwellings tend to have fewer viability issues in meeting policy requirements than sites of 5-9 dwellings, and WBDC may wish to consider seeking affordable housing contributions from all sizes of site. It is also worth noting that it is often very difficult to secure on-site provision below 10 dwellings due to the difficulties in finding a Registered Provider willing to take these units on, and WBDC may wish to reflect that a financial contribution on smaller sites is likely to be more achievable in most cases. |
| Burghfield Parish Council | Missing a definition of affordable housing. |
| Speen Parish Council | Risk that this policy will be interpreted as to only require net zero carbon during the building of a property, and not for the whole life of the structure. Suggest this is reworded accordingly. |

General Consultation Bodies:

| Consultee | Main issues |
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| Home Builders Federation | Whilst the HBF agrees with regard to the use of a variable approach, concerned that the rate applied to PDL sites is, as noted in paragraph 3.1.16, at the upper end of what is viable. The requirements for 10% BNG and net zero carbon emissions will place more pressure on development. The evidence indicates that 30% affordable housing on many such sites will be unviable or marginal and as such a lower overall requirement would ensure more sites come forward without the need for negotiation. |

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| | If it is the Council's intention that all sites of between 5 and 9 should provide 20% affordable housing, then the HBF consider this policy to be unsound. The policy should clearly state that only sites of 5 to 9 dwellings in designated rural areas are required to deliver affordable housing. |
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Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | Existing policy has failed – no comment on whether this policy is more likely to succeed. |
| Cllr Alan Macro | Support policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|---|
| Ridgepoint Homes | The amended wording to require affordable housing on sites doesn't offer sufficient flexibility to negotiate alternative provisions in exceptional circumstances as previously included in the draft policy. Suggest the policy wording is reverted to 'sought by negotiation'. The requirement for affordable housing to be sought on sites of 5-9 dwellings conflicts with NPPF 64 and could make these sites unviable. Suggest point b is deleted. The requirement for affordable homes to be built to net zero carbon standards should be reflective of the building regulations requirements. Suggest this is deleted. The dispersion of affordable homes across a development can result in management issues for Registered Providers. Suggest this requirement is amended to include a maximum cluster of 15 units houses and 21 units for apartments. |
| Abri Group (Housing Association) | Lack of affordability of First Homes - will require additional discounts which would prejudice viability of delivering affordable rented housing. Proposed that Council review whether omission of tenure (as supported by Bath and North Somerset Council) or flexibility (see Guildford Borough Council) could protect overall level of affordable housing being delivered, which would be justified by evidence base. |
| Rectory Homes | Does not accord with paragraph 64 of NPPF – should be made clear that part b) of policy only applies within designated rural areas. |
| Solve Planning for Harry West Investments Ltd. | Support SP18 and SP19 along with DM 16 – DM19 which seek to provide a good mix of housing types. |
| Planning Issues for Churchill Retirement Living | Have carried out our own viability appraisal on this policy - provided. |

| Consultee | Main issues |
|---|---|
| Turley for Donnington New Homes | Support the re-wording of the policy from the Regulation 18 stage, to ensure the care homes (use class C2) are considered as part of the affordable housing mix on a case-by-case basis. |
| White Peak Planning Ltd for Bloor Homes Ltd | Object. In relation to the requirement for affordable homes to be built to net zero carbon standards, the policy should align clearly with Policy DM4. Suggested amendment supplied. |
| TOWN for landowners of Land East of Pincents Lane | Neither the policy nor the supporting text recognises the really urgent need for the delivery of more affordable housing. There is no reference to any intention to seek early delivery of affordable housing and to do so in locations close to areas of clear demand. Thus no affordable targets or requirements are set in the context of the settlement hierarchy. This is all required to ensure consistency with NPPF 11 a&b, 61-63. |
| Pro Vision for T A Fisher & Sons Ltd | This policy has been amended to state that viability assessments must be publicly available. The information in viability assessments can often be commercially sensitive and therefore this amendment should be removed, or amended to say that a summary must always be made publicly available. The required review mechanism to enable the Council to reassess viability over the lifetime of the development is not reasonable and in any event would be difficult to monitor/enforce. There should be a definition of net-zero as interpretations can vary. |
| The Planning Bureau for McCarthy Stone | Paragraph 4 should be amended to also include sheltered housing and retirement living. It should be clarified that specialist housing schemes for older people should be exempt from providing First Homes and Starter Homes on site. Having mandatory net zero standards from adoption goes beyond Government targets, and the policy should be 'stepped' in line with Government targets. Part 11 of the policy should therefore be deleted. Suggested policy wording provided. |
| Gleeson Land | The affordable housing target percentages of 30% on brownfield land, 40% on greenfield land and 20% on developments between 5-9 dwellings mean that the target will not be met. Should increase overall housing target so that affordable housing delivery also rises due to the very high need for such homes. |
| Nexus Planning for Croudace Homes | It is estimated that from the allocated sites, the strategy for delivering affordable homes won't meet the requirement (based on total requirement of 5,610 homes). The overall housing requirement should be increased so that a greater proportion of affordable housing needs can be met. |

Summary of issues raised:

Some support for the policy, particularly from Reading Borough Council with recommendation to consider seeking affordable housing contributions from all sizes of site.

The main issues raised in objections to the policy include:

- Concern that the rate applied to PDL sites is at the upper end of what is viable. The requirements for 10% BNG and net zero carbon emissions will place more pressure on viability of development.
- The intention to provide 20% affordable housing should apply only to sites of 5 to 9 dwellings in designated rural areas.
- The requirement for affordable homes to be built to net zero carbon standards should be reflective of the building regulations requirements. The policy should align clearly with Policy DM4.
- The overall housing target should be raised so that the delivery of affordable housing is also increased.
- Lack of affordability of First Homes – suggestion that Council review whether omission of tenure or flexibility could protect the overall delivery of affordable housing, which would be justified by evidence base.
- Neither the policy nor supporting text recognise the really urgent need for the delivery of more affordable housing. No affordable targets or requirements are set in the context of the settlement hierarchy (required to ensure consistency with NPPF 11 a&b, 61-63).
- The information in viability assessments can often be commercially sensitive and therefore the amendment to state that they must be publicly available should be deleted or amended.
- The required review mechanism to enable the Council to reassess viability over the lifetime of the development is not reasonable and would be difficult to monitor/enforce.
- Where reference in policy to extra care housing, should be amended to also include sheltered housing and retirement living. It should be clarified that specialist housing schemes for older people should be exempt from providing First Homes and Starter Homes on site.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP20 Strategic approach to employment land

Number of representations received: 28

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
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| Basingstoke and Deane Council | Concerns about the shortfall in employment provision, and keen to continue to engage in suitable discussions under the Duty to Cooperate. |
| Bracknell Forest Council | Not clear what the quantum of unmet need over the plan period is. The position has not changed, and BFC is unable to assist with meeting any unmet need. As it is not known if there is any unmet need for retail, BFC is unable to comment on any implications at this stage. |
| Reading Borough Council (RBC) | Whilst West Berkshire is a separate Functional Economic Market Area from Reading, there would nonetheless be cross-boundary implications should a lack of provision in West Berkshire lead to pressures on adjoining areas such as Reading. However, RBC recognises that WBDC had made substantial efforts to try to identify sites for employment provision including repeated call for sites exercises and sufficient appropriate sites have not been forthcoming. The Covid-19 pandemic has likely had significant implications for working patterns and the demand for employment floorspace, particularly for offices, which will not have been reflected in the identified need. RBC is therefore satisfied with the approach proposed, which involves a supportive criteria-based policy together with a commitment to address this issue in the first five-year review of the Local Plan. |
| Royal Borough of Windsor and Maidenhead | Recognises that West Berkshire have identified a shortfall in office and industrial space and reiterate that the Royal Borough is unable to assist in meeting some or all of these unmet employment land and space needs over the plan period. |
| Slough Borough Council | We support the commitment in the Plan to review the provision of employment land at the first five year review of the plan. Slough Borough Council is not in the same employment market area as West Berkshire, is unable to meet its employment needs in full and therefore is unable to assist with West Berkshire's unmet needs. These will potentially increase the unmet needs that will need to be accommodated and could exacerbate development pressures across the sub-region. |

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| Swindon Borough Council | SBC is supportive of the plan's broad ambitions – the full application of the strategy, plan policies and other tools, may support local economic ambitions and reduce shortfalls. At this stage, Swindon Borough Council is unable to assist with meeting West Berkshire's office and industrial shortfalls. Welcome further DtC discussions. |
| Wiltshire Council | Critically important for the plan to include policies to support the retention, intensification, and regeneration of existing employment sites/areas, as well as encouraging and facilitating windfall sites. Understood that West Berkshire's need for employment needs are at a local level, therefore it will be important for this to be provided for locally or in areas that are spatially well located to Newbury and other urban parts of the district. It is not considered that Wiltshire is an appropriate location for such development, where the character of the area is largely AONB. Wiltshire Council is unable to assist in meeting the shortfall for employment land. |
| Test Valley Borough Council | Unable to assist in meeting the shortfall for employment land and floorspace. In any case, it would not be appropriate or suitable as the two authorities are in separate Functional Economic Market Areas and there is only a low level of economic interaction both in terms of commuting/labour market and operation of commercial land and property markets. It is not clear whether the office and industrial deficits relate to Newbury or the edge of Reading. |
| Wokingham Borough Council (WBC) | New allocations for industrial use insufficient to meet the full identified needs for industrial land and no specific land is identified to provide for office use. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs. WBC confirms that it is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated and requests continued engagement as part of the duty to cooperate. |
| Stratfield Mortimer Parish Council | The rules for loss of business development outside of a DEA do not include rural service centres such as Mortimer. This would mean that every conversion of a farm shop/building into a house would require marketing evidence and it is unclear whether this is the intention. |
| Aldermaston Parish Council | Concerned that increased development on industrial estates could lead to additional traffic on the A340 which plays a key role in the evacuation route for AWE. |

General Consultation Bodies:

| Consultee | Main issues |
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| DPD Consulting Group for Thames Valley Chamber of Commerce (TVCC) | TVCC broadly supports Policy SP20 which states that 'The redevelopment and regeneration of existing employment sites for business uses will be supported. However, the policy does not go into sufficient depth on how this will be achieved. Representation focuses on LRIE at para 7.10 and seeks a comprehensive development-plan led policy framework which has been subject to an SEA. TVCC have concerns regarding the justification of Policy SP20. TVCC supports the aim of intensifying employment uses on sites, along with regeneration and redevelopment, however, in order to ensure sustain development of sufficient quality to attract inward investment the LPR should set out criteria |

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| | <p>led site-specific policies for each DEA which considers the relevant constraints and characteristics of the site, along with identifying the boundary of each site.</p> <p>TVCC suggests the council should work proactively with the AWE establishments to determine the full extent of any potential employment land impacts.</p> <p>The representation also concerns other policies which were not subject to additional representation forms as the changes are dependent on the content of the main representation on this policy. The other policies are as follows:</p> <p>Policy SP21 – TVCC supports the allocation of additional land for employment uses and the criteria based policies for these sites.</p> <p>Policy SP23 – Policy SP23 should be referenced in any future site specific policies for each DEA as proposed above.</p> |
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Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | <p>It is inferred that the Council will use DEA's to restrain the damaging use of permitted development rights to convert business premises to residential use. If correct, that approach is strongly supported.</p> <p>The NEW1 London Road Industrial Estate area has mysteriously escaped allocation in SP13 or SP20.</p> <p>Needs to include retail and commercial land specifically.</p> <p>Need a map of DEAs.</p> <p>Concerned how and where employment to serve an extra 9,000 households will come from without commuting, which is not factored into the plan. Indicates extra commuting</p> |
| Liberal Democrat Group | <p>Clear to us that certain key stakeholders could have been persuaded to resolve the issue of lack of employment sites in suitable locations. e.g Newbury Showground which could be a rural business hub for a wider area of North Wessex & beyond and might, in the short to medium term, enable relocation of some businesses from the LRIE to enable that site to be redeveloped earlier.</p> <p>We also have concerns that by encouraging office development in DEAs (as implied in 7.7 second sentence) such as LRIE, where there are many 'blue collar' jobs in the motor industry, the future viability of these businesses may be endangered unless there are other employment sites within a short distance from their customer and employee base.</p> <p>SP20 likely to be ineffective without changes to SP21 and the list of DEAs</p> |
| DPD Consulting Group for Newbury Community Football Group | <p>NCFG have concerns regarding the justification and consistency with national policy of Policy SP20, in particular the approach to the London Road Industrial Estate set out in Paragraph 7.10. This is considered unsound on account of the lack of a proper planning policy context and site-specific guidance to control the development or redevelopment of the area.</p> <p>NCFG supports the overall ambition to achieve redevelopment and regeneration of the LRIE site. However WBC has specifically and irrationally excluded the option to redevelop the football ground as a revitalised sporting venue for the overall benefit of the community.</p> |

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| | <p>The Council's current strategy for the regeneration of the LRIE is outlined within the London Road Industrial Estate Project Refresh report (Ref. EX4219), dated 9th June 2022. This refocuses plans on intensifying employment use on the site, marking out the 'depot site' and the 'playing field' as two areas to be redeveloped (despite the fact that the playing field is not within the DEA boundary). It seeks to create an LRIE Supplementary Planning Document (SPD) for the redevelopment of the site, rather than for example a site specific Local Plan allocation.</p> <p>The supporting text of Paragraph 7.10 does not provide sufficient clarity on the future of the LRIE site (or the football ground). The plan fails to justify why LRIE is only mentioned in supporting text when the Council has specific plans for the regeneration, contained within the Refresh report. A comprehensive development-plan led policy framework would be required to set out criteria for sustainable development or redevelopment. An SPD approach would not be able to achieve this.</p> <p>Paragraph 7.10 should be deleted and replaced with site specific policies for both LRIE and the Faraday Road football ground and a specific policy be implemented concerning any proposals for use or change of use of the football ground at Faraday Road. Suggested wording provided.</p> |
| Cllr Alan Macro | <p>The proposal to allow office development in DEAs is unsound. If the office market recovers there will be pressure to redevelop non-office premises as offices and this will lead to the loss of skilled, semi-skilled and unskilled manual occupations.</p> <p>To exempt new office developments in DEAs from sequential test will endanger the viability of town centres.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Savills – on behalf of Crest Nicholson Partnerships and Strategic Land. | It is considered that the plan should take into account industrial and logistics need in the Berkshire Functional Economic Market Area ('FEMA') and wider region. Representation sets out how site at Grazeley can contribute to this regional need. The existence of a DEPZ should not be a reason for assuming any development is inappropriate. Considered that policy SP20 should be amended to reflect FEMA and regional need and dictate that need can be achieved through sites outside the West Berkshire Council authority area. |
| Pegasus Group for Walker Logistics (Holdings) Ltd. | The LPR does not accord with the ELR, as it fails to allocate sufficient floorspace to meet the identified need in the ELR, and does not frontload the plan with a readily available pipeline of space. Thus the LPR cannot be found sound as it does not meet its objectively assessed needs. Support the approach to extend the DEA allocation at Membury estate and approach to support business development in these locations. |
| Stantec for Copas Brothers (Farms) Ltd. | Given the identified need for smaller, flexible offices any opportunities to provide this supply should be taken up. There is a pressing need for industrial floorspace in West Berkshire, which has been deemed as exceptional circumstances such as to justify allocation within the AONB. Therefore, it is unclear why further suitable sites such as those promoted have not been included as allocations. |

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| | <p>Do not agree with approach to address the supply matter at a five-year review, given that there is an unmet need now, with available sites, and it is unlikely that a significant amount of 'new' land would come forward by the review date. This approach is unsound.</p> <p>Promoted Land adjacent to Beenham Industrial Area should be included as an allocated employment site to assist with meeting the identified need for office and industrial space. Contest the conclusions of the Landscape Character and Sensitivity Assessments and sensitive mitigation could reduce any perceived landscape and visual impacts.</p> <p>The London Road Industrial Estate site is not allocated, therefore it cannot contribute towards employment needs, and reference should be removed.</p> |
| Savills UK obo the Englefield Estate | <p>The clarification regarding the contribution of development at existing employment sites or at suitable rural sites is welcomed given the importance of these sites to the local rural economy.</p> <p>Recommended that the development of suitable sites adjacent to existing employment areas is also supported within Policy SP20. This would enable the development of suitable land adjacent to Green Park (which is designated for employment use within Reading and Wokingham Boroughs) to come forward. The Estate's land at Green Park, Kirtons Farm Road (ref. BUR12), should be considered in its overall context across local authority boundaries and critical that Policy SP20 enables the appropriate development of the site.</p> <p>The NPPF (paragraph 89) is clear that the sequential test should not be applied to small-scale rural offices or other small-scale rural development. Policy SP20 should be updated to ensure that suitable small-scale proposals can come forward to support the rural economy without unnecessary additional justification.</p> <p>Suggested amendments included in representation.</p> |
| Pro Vision obo Mr and Mrs Pittard | <p>Representation re. Land at Lower Way Farm, Thatcham.</p> <p>The main focus for the provision of industrial space is through the regeneration of the London Road Industrial Estate (LRIE) and is expected to provide flexibility to the need figures in the later part of the plan period. However, focusing industrial development primarily in one area is concerning and does not allow for other suitable and sustainably located sites to come forward which would be able to make an important contribution to meeting the identified needs.</p> |
| Turley obo Panattoni | <p>The requirement for employment uses and current shortfall in employment land over the plan period should be enshrined in policy.</p> <p>The SA/SSEA is flawed as has not considered the impact of not meeting employment need, nor has it considered an Option where the employment need is met in full. The Council does not appear to have considered any scenarios in relation to the employment needs, whether that be the impact of the shortfall and meeting or exceeding the employment need over the plan period. The legal test for the consideration of reasonable alternatives has not been met.</p> <p>We do not consider that the Council have positively sought opportunities to meet the industrial requirement. The Council have deleted a previously proposed allocation, specifically land at Hoard Way, Theale, purely on landscape grounds.</p> <p>The mechanism for a 5-year review, the means by which the Council are to meet the identified shortfall, also needs to be included as a policy requirement.</p> |

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| | In relation to the Policy wording itself, we believe this is overly restrictive - policy provisions are required to provide flexibility as under Policy CS9 of Core Strategy. |
| Deloitte obo Green Park(GPR) | Representation re land at 900 South Oak Way, Green Park. The required sequential test for new office development outside of town or district centres and the defined DEAs creates a potential barrier to the long-term investment and sustainable growth of Green Park should it not be defined as DEA. GPR requests that a point is added to the policy to state that subsidiary uses to existing or new business development would not face the same sequential test even if they fall outside a Designated Employment Area. It is also important that the LPR does not restrict business development coming forward in suitable locations outside of DEAs as currently defined. Supports the updated LPR's inclusion of " <i>support for redevelopment and regeneration of existing employment sites for business uses</i> " Considers that it is important that the LPR recognises the benefits of providing supporting subsidiary uses such as small-scale retail or hotel to business development locations GPR continues to request that Policy SP20 is also updated to include Data Centres as an appropriate business use. |
| Gerald Eve LLP obo Fairhurst Estate & Fairhurst Estates Properties Limited | Representation re. land to the south east of M4 junction 13: (HELAA CHI24) Land provides an opportunity for meeting some of the economic objectives of the new Plan in an appropriate and deliverable form with excellent access to the strategic highway network, and the potential for enhanced linkages into Newbury. Should be designated as DEA. The policy approach fails to deliver appropriate opportunities for employment development and economic activity alike - there is not one reference to logistics provision, which would be most appropriately located adjacent to a key motorway and trunk road junction (M4/A34 Junction 13). Disagree with conclusions of HELAA assessment of site. |
| Pro Vision for Wasing Estate | Council have a long history of under-provision of employment floorspace. The current under-provision does not meet the government's aims to build a strong and competitive economy and is unsound. Object that BRIM3 was not allocated for employment use. The lack of 'brownfield' sites means that there is a duty to consider greenfield sites and sites less well served by public transport. |
| Pro Vision obo Hope & Clay Construction Ltd | Representation re. Easter Park. WBC are no longer proposing to allocate Easter Park as designated employment site, nor are they considering its extension for additional employment floorspace, due to location within the AWE DEPZ. The updated HELAA confirms that sites within notified safety zones will not automatically be excluded but impact assessed on merits. The recommendation drawn by the SA/SEA is clearly inconsistent with the conclusions of the HELAA and its methodology and no clear reason has been provided as to why this suitable employment site is ruled out purely because of its location within the Aldermaston DEPZ. |

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| | <p>The Regulation 18 draft LPR was published for consultation after the REPPIR Radiation Regulations 2019 were revised so reasonable to assume the Council would have taken account of these.</p> <p>The Regulations and Guidance do not preclude development within the DEPZ. It is the Council's role to consider whether proposed development can be accommodated within the off-site emergency plan, not to treat the DEPZ as an absolute constraint.</p> <p>Council's approach risks undermining the long term viability of this established employment site, inconsistent with national policy. The LPR does not identify sufficient sites to meet the identified need resulting in significant shortfall in employment land provision.</p> |
| West Berkshire Council (as landowner) | <p>Additional wording to the supporting text to clarify Council's aspirations for LRIE – suggested wording provided.</p> <p>The long term intention is to include the Football Ground – suggested wording to make this clear provided.</p> |

Summary of issues raised:

Neighbouring authorities are unable to contribute to meeting West Berkshire's unmet need but are supportive of the commitment to address this issue in the first five-year review.

The main issues raised in objections to the policy include:

- Does not meet objectively assessed need. Developers/site promoters argue issue should not be left to review and identify additional sites, including development of suitable sites adjacent to existing employment areas.
- The Liberal Democrat Group suggest that Newbury Showground could become rural business hub.
- Development within the DEPZ should not be precluded. It is the Council's role to consider whether proposed development can be accommodated within the off-site emergency plan, not to treat the DEPZ as an absolute constraint.
- The SA/SSEA is flawed as does not appear to have considered any scenarios in relation to the impact of the shortfall and meeting or exceeding the employment need over the plan period.
- Considered that the plan should take into account industrial and logistics need in the Berkshire Functional Economic Market Area ('FEMA') and wider region.
- Thames Valley Chamber of Commerce believe the LPR should set out criteria led site-specific policies for each DEA which considers the relevant constraints and characteristics of the site.
- Concern regarding encouragement of office development in DEAs and impact on viability of town centres.
- London Road Industrial Estate – supporting text does not provide clarity on future of LRIE or the football ground. It has irrationally excluded the option to redevelop the football ground as a revitalised sporting venue. A comprehensive development-plan led policy framework would be required. WBC, as landowner, suggest wording to make clear that the long term intention is to include the football ground in the LRIE.

- Paragraph 89 NPPF is clear that the sequential test should not be applied to small-scale rural development. Policy should ensure that suitable proposals can come forward without unnecessary additional justification.
- Policy wording is overly prescriptive.
- Important that the LPR recognises the benefits of providing supporting subsidiary uses such as small-scale retail or hotel to business development locations. Request that also updated to include Data Centres as an appropriate business use.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: SP21 Sites allocated for employment land**

Number of representations received: 23

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---------------------------------|--|
| Wokingham Borough Council (WBC) | New allocations for industrial use insufficient to meet the full identified needs for industrial land and no specific land is identified to provide for office use. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs. WBC confirms that it is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated and requests continued engagement as part of the duty to cooperate. |
| Aldermaston Parish Council | Concerned that increased development on industrial estates could lead to additional traffic on the A340 which plays a key role in the evacuation route for AWE. |
| Hampshire County Council | It is recognised that Greenham Business Park is already a well-established employment area but Hampshire County Council would like to be involved as a stakeholder in any discussions regarding any potential changes which are likely to affect traffic flows of heavy vehicles which utilise the A339 in accessing or departing from the site. |
| Lambourn Parish Council | Membury: Addition of ESA3 increases the risk of industrial sites coalescing and changing the landscape character and impacting on Membury Airfield Landscape Character Area. The plan is not addressing cumulative effects of development in this area. There is no evidence that local demand for employment will be met by further development at Membury. The plan does not take into account reasonable alternatives for the provision of employment land in the District. Evidence to expand the Membury DEA has not been supplied. |
| Lambourn NDP Steering Group | As for Lambourn Parish Council |

General Consultation Bodies:

| Consultee | Main issues |
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| Campaign to Protect Rural England (CPRE) | There are sites along the A4 which would be better suited for housing rather than commercial use e.g. 170 houses at Siege Cross/Colthrop with a railway and Canal Bridge which we strongly support. Proposal for a large distribution centre east of Thatcham would be unsuitable due to lorries coming from A339 along poor roads through Thatcham and Aldermaston Village. |

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Liberal Democrat Group | Clear to us that certain key stakeholders could have been persuaded to resolve the issue of lack of employment sites in suitable locations. e.g Newbury Showground which could be a rural business hub for a wider area of North Wessex & beyond and might, in the short to medium term, enable relocation of some businesses from the LRIE to enable that site to be redeveloped earlier. We have no confidence that LRIE will be redeveloped for commercial use within the Plan period without significant proactive intervention by the District Council. Of the view that by allowing the re-provisioning of the football facility in Faraday Road and by implementing the consented Gateway Plaza the Council will attract significant interest in commercial development of the rest of the site, provided some of its current occupiers can be relocated at least temporarily Membury is not sustainable and its use for employment has harmed the AONB significantly more than we believe Newbury Showground would. Having a major distribution centre at the Showground is likely to reduce demand for such development at Colthrop, which would in turn reduce the number of HGVs using the A4 through Newbury & Thatcham. Suggest deletion of ESA3 and add Newbury Showground. |
| DPD Consulting Group for Newbury Community Football Group | The whole approach to the regeneration of the LRIE is unsound due to lack of a proper planning policy context and site-specific guidance to control the development or redevelopment of the area – the strategy is inappropriate for a development of this scale |
| Various individuals/ local residents | It is inferred that the Council will use DEA's to restrain the damaging use of permitted development rights to convert business premises to residential use. If correct, that approach is strongly supported. Needs to include: NEW1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, Site for a new retail park as identified on the policies map – Greenham. Need a map of DEAs and Brownfield Sites to determine which will be residential/mixed/employment. Large sites we know will be developed, such as London Road Industrial Estate, Gateway Plaza, Kennet Centre/Eagle Quarter are not included in the plan. They should be included, with policy to guide their development. |

Membury Sites:*Traffic*

Appalled by the push to extend the Membury site despite lack of transport infrastructure and irreparable damage to the AONB.

The B4000 is a minor road that cannot cope with the increases in traffic. Residents have suffered increased noise and disruption.

Needs traffic calming measures e.g. chicanes, signs, speed limits, speed cameras, and restriction on lorries over 7.5 tonnes.

No public transport and further development will only increase traffic problems and could lead to fatalities.

Traffic impacts including the recent crash. Local roads unsuitable.

No highways plan and only has B roads to reach it, with no improvements included in Transport Plans.

Road is too small for 2 HGVs to pass

No sustainable travel plans which is concerning given the sites' rural nature.

Roads are dangerous and lack of cycles lanes means that the impact on the traffic network is unacceptable.

The M4 was shut down at least twice due to chemical releases from Rutpen.

Amenity

Increased noise and air pollution - impacting health and wellbeing of residents.

Amenity impacts – noise, disturbance.

Proposed development at Membury threatens locals by increasing traffic on the B4000, including traffic pollution and risk of accidents, puts the AONB at risk.

Makes living in the area unappealing and unattractive.

The proposed development at Membury is unsustainable if local resident's needs are given consideration, plus risk of flooding, pollution (including light pollution) and carbon footprint.

Flooding

Increased footprint has caused flooding, exacerbated by lack of permeable membranes.

Will cause surface water run off which will pollute chalk streams and aquifers.

Infrastructure

Local infrastructure will gradually crumble until it will be unfit for purpose.

Infrastructure cannot cope with power demands of industrial estate – power outages.

Landscape/Visual/Biodiversity

The AONB is under threat and the Council needs to safeguard it.

Lack of environmental assessments in the AONB.

Effects on landscape inconsistent with location in the AONB.

Proposals will impact rural character of the area.

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| | <p>Negative impact on night skies and wildlife habitats. Proposal may impact ancient woodland. <i>Climate Change</i> Development will increase carbon footprint of the area - against WBC's own policy. WBC carbon and pollution policies haven't been adhered to at Membury. <i>Agricultural Land</i> Spread of industrial into agricultural land - will impact negatively on food production and rural economy. <i>Process</i> No Environmental Impact Assessment, flood risk assessment or cumulative impact assessments. They both fail to meet the Council's sustainability targets due to: no sustainable transport access, no EIA, minimum benefits to local economy and employment to justify removal of AONB land and use of non-standard/possibly illegal processes for reviewing the environmental impacts of proposed developments. Concerned no Environmental Impact Assessment has been carried out at Membury which has led to an intolerable increase in traffic. Economic arguments do not outweigh the environmental arguments and effects on residents in this location. Many of the proposals are outside of contrary to the Council's own strategic or operational policies. Some of the sites proposed for industrial development are against environmental and employment policy, and are unsustainable. Local community groups and Local Nature Partnerships haven't been consulted regarding industrial development at Newbury. The Santec Report is clear that development is required in Newbury and Reading, but not here. Walker development should not have been allowed to proceed. The removal of sites LAM9 and LAM10 will make the Plan legally compliant. Object to continued expansion of industry at Membury. Stop further development in Membury. Industrial development in this location seems to go against the government's desire to protect these areas (AONB's).</p> |
| <p>Woodlanders Protection Group</p> | <p>No clear that all legal requirements have been met. All references to additional industrial development at Membury ESA2 and ESA3 should be removed. Stantec report states that any distribution businesses should be close to Motorway Junctions – Membury is 7km away. Site is unsustainable in traffic terms as there is no local workforce and all workers need to use cars due to lack of public transport. Traffic generation has removed leisure activities from the area e.g. walking, cycling, horse riding. Current sites are unmanaged and ownership is unclear. No joined up masterplan of the area No EIA for the site or wider area</p> |

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| | <p>No drainage strategy or infrastructure No understanding of utilities demand and capacity – strain on power. Local road system unsuitable. No risk assessment for the site – airfield, motorway, chemical storage, fuel storage and unknown risks within the current businesses as yet unassessed. The location is unsustainable. Council officers have stated that the site is not sustainable and no further development should take place. P Plans for Membury should be removed</p> |
| DPD Consulting Group for Newbury Community Football Group | In addition to a site-specific policy, it is recommended that the LRIE is added to Table 4 of Policy SP21 Sites Allocated for Employment Land. |
| Cllr Alan Macro | Support the removal of site EMP6 since the Reg18 stage. This site was completely unsuitable due to erosion of gap between settlements and surface water and groundwater flooding. |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Pegasus Group for Walker Logistics (Holdings) Ltd. | Support approach not to include the land at LAM6 as additional supply, but count within committed supply. |
| Stantec for Copas Brothers (Farms) Ltd. | <p>Given the identified need for smaller, flexible offices any opportunities to provide this supply should be taken up. There is a pressing need for industrial floorspace in West Berkshire, which has been deemed as exceptional circumstances such as to justify allocation within the AONB. Therefore, it is unclear why further suitable sites such as those promoted have not been included as allocations.</p> <p>Do not agree with approach to address the supply matter at a five-year review, given that there is an unmet need now, with available sites, and it is unlikely that a significant amount of 'new' land would come forward by the review date. This approach is unsound.</p> <p>Promoted Land adjacent to Beenham Industrial Area should be included as an allocated employment site to assist with meeting the identified need for office and industrial space. Contest the conclusions of the Landscape Character and Sensitivity Assessments and sensitive mitigation could reduce any perceived landscape and visual impacts.</p> <p>The London Road Industrial Estate site is not allocated, therefore it cannot contribute towards employment needs, and reference should be removed. Changes to policy and supporting text supplied.</p> |

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| Pro Vision for Mr and Mrs Pittard | The evidence base demonstrates there is demand for small and medium sized sites for employment in the District. The LPR should be allocating more sites for economic and business development that are consistent with the broad spatial strategy. There are many available sites within the HELAA which have been overlooked, including our client's site 'Land at Lower Way Farm' (HELAA ref: THA9). 'Lower Way Farm Riverside Studios' is a successful established local employment premises, which we consider should be reflected in its allocation in the LPR. |
| Turley for Panattoni | We consider further sites should be allocated for employment uses such as land at Hoad Way, Theale. Representation includes site details and Landscape and Visual Impact Appraisal |
| Deloitte for Green Park(GPR) | Representation re land at 900 South Oak Way. GPR reiterates its request that Policy SP21 be amended to include Green Park and for the Site to be allocated as a Designated Employment Area. Designation would provide continuity to the existing Core Employment Area which falls within the boundary of Reading Borough Council. In particular, the imminent opening of Green Park Railway Station makes it a very sustainable location for a Designated Employment Area. |
| Pro Vision for Hope & Clay Construction Ltd | Representation re. Easter Park. WBC are no longer proposing to allocate Easter Park as designated employment site, nor are they considering its extension for additional employment floorspace, due to location within the AWE DEPZ. The updated HELAA confirms that sites within notified safety zones will not automatically be excluded but impact assessed on merits. The recommendation drawn by the SA/SEA is clearly inconsistent with the conclusions of the HELAA and its methodology and no clear reason has been provided as to why this suitable employment site is ruled out purely because of its location within the Aldermaston DEPZ. The Regulation 18 draft LPR was published for consultation after the REPPiR Radiation Regulations 2019 were revised so reasonable to assume the Council would have taken account of these. The Regulations and Guidance do not preclude development within the DEPZ. It is the Council's role to consider whether proposed development can be accommodated within the off-site emergency plan, not to treat the DEPZ as an absolute constraint. Council's approach risks undermining the long term viability of this established employment site, inconsistent with national policy. The LPR does not identify sufficient sites to meet the identified need resulting in significant shortfall in employment land provision. |
| West Berkshire Council (as landowner) | Propose extending the LRiE Designated Employment Area to cover land to the south currently comprising a playing field, car park and open space – plan provided. Propose additional supporting text to align with the Council's aspirations for LRiE as landowner – suggested wording provided. |
| Pro Vision for Wasing Estate | Council have a long history of under-provision of employment floorspace. The current under-provision does not meet the government's aims to build a strong and competitive economy and is unsound. |

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| | Object that BRIM3 was not allocated for employment use. The lack of ‘brownfield’ sites means that there is a duty to consider greenfield sites and sites less well served by public transport. |
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Summary of issues raised:

- Significant number of objections to the extension of Membury Industrial Estate, largely on grounds of landscape impact, inadequate transport infrastructure, risks of flooding, pollution, carbon footprint, noise, impact on rural economy, inadequate infrastructure to cope with power demands, lack of EIA for site or wider area.
- Misunderstandings regarding London Road Industrial Area, which is already a Protected Employment Area.

Additional employment sites proposed:

- Newbury Showground suggested by Liberal Democrat Group
- Land at Lower Way Farm ((HELAA ref: THA9)
- Hoad Way, Theale
- Easter Park, which is no longer proposed due to location within DEPZ (impact should be assessed on merits)
- Land adjacent to Beenham Industrial Area.
- Extension of LRIE to the south from the Council as landowner.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: SP22 Town and district centres**

Number of representations received: 8

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---------------------------------|---|
| Wokingham Borough Council (WBC) | WBDC's existing evidence from 2016 identified a significant need, and it is not clear how far this has been met, or whether the identified needs remain appropriate. WBC stresses the importance of WBDC's evidence being updated as soon as possible and the Plan being reviewed as necessary to address this in the short term. |
| Theale Parish Council | The Plan states a need for additional office space, yet many offices and shops in Theale have been converted to residential. The assertion should be backed up by evidence. Theale has had no investment in leisure facilities or public transport, which should be reflected in the Plan. |

General Consultation Bodies:

| Consultee | Main issues |
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| DPDS Consulting for Thames Valley Chamber of Commerce (TVCC) | TVCC supports the Council's goal of maintaining and enhancing the vitality and viability of West Berkshire's town and district centres. However, the policy is somewhat lacking in the re-imagination element and could do more to ensure town centres remain dynamic and attract inward investment. |

Other Stakeholders:

| Consultee | Main issues |
|--------------------------------------|---|
| Various individuals/ local residents | Town and village centres in West Berkshire are predominantly governed by conservation areas, to which the development of the centres should be subject. The value of Conservation Areas is directly related to the approval of a Conservation Area Appraisal and little to no progress has been made on this which should be rectified. |

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| | There is no specific policy for retail and commercial space and this is not adequately covered under SP22. Within Newbury there are many and varied retail and commercial space, however the only map available is the Town Centre Retail Area. Presume this will be changed to the new red line under this LPR. Need a specific policy for Newbury. |
| Cllr Alan Macro | To exempt new office developments in DEAs from sequential test will endanger the viability of town centres. The sentence “ <i>changes of use within the primary shopping area from Class E to other uses will be permitted where they do not result in a disproportionate concentration of non-Class E units that would be harmful to the vitality of that centre</i> ” is not sufficiently restrictive and would allow the viability and vitality of shopping areas to be eroded. Suggested wording supplied. |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Turley Associates for Pangbourne College | Pangbourne – additional housing/economic & commercial growth should be brought forward to support the vitality and viability of the district centre. |

Summary of issues raised:

- Support for goal of maintaining and enhancing the vitality and viability of town and district centres
- Importance of evidence being updated as soon as possible
- Need for specific policy for Newbury.
- To exempt new office developments in DEAs from sequential test will endanger the viability of town centres.
- Policy regarding changes of use form Class E is not sufficiently restrictive.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP23 Transport

Number of representations received: 19

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---|--|
| Reading Borough Council (RBC) | <p>Development close to the boundary between West Berkshire and Reading is likely to have implications for cross-boundary transport networks, and mitigation of these impacts may also need to take place on a cross-boundary basis. This requires some recognition within the policy.</p> <p>The plan as a whole lacks reference to the provision of new strategic transport infrastructure, in particular park and ride. Policy DM42 is not strategic in nature. The Reading Borough Local Plan identifies the A4 and A329 corridors crossing the boundary to West Berkshire as being a priority for the provision of park and ride. This will realistically require provision of park and ride sites within West Berkshire. No specific sites have been identified, but there should nonetheless be some recognition of the importance of park and ride provision in the Reading area. Suggested additional bullet point and text in policy supplied.</p> |
| Royal Borough of Windsor and Maidenhead | Supports the objective to mitigate the impact of planned growth on the strategic road network and to promote low emission transport choices. |
| Burghfield Parish Council | Should this be cross referenced to DM42, and how the two tie in together? |
| Thatcham Town Council | <p>If the transport assessment is “being undertaken to run concurrently with the LPR process”, then the evidence for the SA/SEA cannot have been available when Appendix 5 SA/SEA of Strategic Policies was prepared. There is no basis for conclusion of SA/SEA. The Local Plan impacts have been assessed against a Reference Case which assumes no growth (beyond the current adopted Local Plan) in housing and employment within West Berkshire, which is an unrealistic situation; there will inevitably be growth across the district, and the district is committed to deliver that growth. Therefore clear that the impact of SP23 taken with SP17 in relation to transport is negative. SA/SEA is not legally compliant, the Local Plan cannot be in accordance with Paragraph 32 of NPPF. The SA/SEA needs to be reviewed in relation to transport after completion of the Strategic Transport Analysis.</p> |

| Consultee | Main issues |
|-------------------|---|
| National Highways | NH supports Policy 23. NH requests that WBC expand on what is meant in SP23 by 'a suitable mitigation package' and provide clarity in regard to the SRN. |

General Consultation Bodies:

| Consultee | Main issues |
|-----------------|--|
| Network Rail | This policy should be consistent with NPPF requirements with regard to supporting/promoting sustainable transport. Concerns that opportunities to support sustainable transport and specifically encourage modal shift have been missed. Therefore inconsistent with NPPF 152- 154. |
| Newbury Society | Nothing in the Local Plan about the strategic road network (SRN). When considering allocations, particularly over 1,000 homes the Council should consider the impacts on the SRN. Some new strategic roads may be required to take traffic away from the Robin Hood roundabout. These need to be considered now and not at a later stage. |

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | The emphasis away from car travel should take account of more working from home. The objective to reduce emissions will be achieved by the move to electric vehicles, rather than by abandonment of car usage, due to the convenience of private motoring. National policy strictly supports the move towards electric transmission and therefore the LPR should include a specific plan for the widespread availability of electric charging points on private and public premises. Bus travel only has a limited effect (judging solely from where I live in Newbury). A strategic approach with more routes may be needed if it is to be better supported. The LPR should not exclude new roads and road extensions should these prove necessary. Cars are the primary method of transport for rural areas where the bus network is inadequate and outside Newbury the rail service is inadequate also. Needs planning and investment to improve links between major roads to access industrial areas such as Membury. Need to urgently create a sustainable traffic policy. Simply adding sustainability aspirations to each policy is not adequate. The Draft Local Transport Plan was released very late for residents to be able to have time to incorporate feedback into the LPR. |

| Consultee | Main issues |
|---|--|
| | <p>The increase in employment land at Thatcham and Hambridge Lane will lead to an increase in HGVs with inadequate radial routes, particularly to the south and west.</p> <p>No attempt to look into a logistics and distribution hub near the M4.</p> <p>Need a bridge over the railway at Thatcham to facilitate commuting without passing through Newbury.</p> |
| DPD Consulting Group for Newbury Community Football Group | Client supports the requirement for development that generates a transport impact to meet the criteria contained within this policy. |
| Liberal Democrat Group | <p>The most recent transport modelling was based on models run before the pandemic caused major changes in travel and transport patterns. It was also only projecting forwards to 2037. Nor does it take into account the most recent HELAA in which new sites came forward and other sites which had previously been modelled for were removed.</p> <p>Therefore the modelling needs to be re-run using the best national post-pandemic traffic data and the latest set of sites included in this draft for allocation of development</p> |
| Cllr Alan Macro | <p>The West Berkshire Strategic Transport Model in the Evidence Base has not been updated for the following:</p> <ul style="list-style-type: none"> • End date for LPR revised from 2037 to 2039 • Additional housing sites proposed for Theale, totalling 100 units • Removal of housing sites proposed at Reg19 stage because of imposition of AWE DEPZs • Removal of proposed housing site at Pincents Hill, Tilehurst • Removal of proposed office employment site adjacent to M4 J12 • Proposed policy to allow office development on Designated Employment Areas, that would attract much higher private car traffic |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--------------------------------------|---|
| PSP Consulting for Beftonforth Ltd. | <p>Policy should include a requirement for development that generates a transport impact to demonstrate that all options to secure a modal shift from road to more sustainable transport have been explored.</p> <p>Supporting text should include a new paragraph encouraging a modal shift for the movement of freight from road to rail.</p> <p>Proposed changes to policy and text supplied.</p> |
| Firstplan Ltd, obo Englefield Estate | <p>Representation re Rail-Road Transfer Site at Theale.</p> <p>Failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes - support for growth of the Rail-Road Transfer Site at Theale is sought</p> <p>Suggested amendment to include, as new bullet point in policy, <u>Demonstrate that all options to secure modal shift from road to more sustainable transport means have been explored</u>, together with suggested amendments to supporting text.</p> |

| Consultee | Main issues |
|---|--|
| Lucy White Planning for Bradfield College | <p>The policy doesn't set a minimum threshold for non-residential development which should be accompanied by a Transport Assessment of Statement therefore it is unclear when SP23 should be applied to non-residential development. The policy is therefore inconsistent with NPPF 105.</p> <p>It could prove unfeasible for Bradfield College to meet the criteria of policy SP23, given its rural location, despite general policy support from DM38 for its future development. This could thwart growth.</p> <p>Policy thresholds for non-residential development and exceptions should be identified to clarify applicability of the policy.</p> |
| Barton Willmore, now Stantec obo Yattendon Estate | <p>Paragraph 105 the NPPF recognises that both urban and rural areas face different challenges in terms of provision of transport solutions. Whilst we support the provision of a sustainable transport network, we consider that the requirements of this policy are not proportionate and fail to reflect the rural nature of much of West Berkshire District. SP23 as currently drafted has the potential to directly contradict and undermine Policy SP1 and the support this policy affords to the rural economy.</p> <p>Suggested amendment to include <i>where appropriate</i> at beginning of policy</p> |
| White Peak Planning Ltd obo Bloor Homes Ltd | <p>It is recognised that some adverse impacts on the road network are likely as a result of development: the NPPF is clear that it is significant impacts which require mitigation.</p> <p>The policy refers to a document 'Highway Design Guidance for Residential Developments'. To allow for updates to local design guidance, it is necessary to amend the wording. Suggested amendments supplied.</p> |
| TOWN obo landowners of Land East of Pincents Lane | <p>The site promoters have commissioned an analysis of the transport evidence for the LPR. This concludes <i>that none of the strategic TA work undertaken by WBC as part of its Local Plan Review justifies the current spatial approach of continuing to load most residential development in the west of the District, e.g. around Newbury and Thatcham</i>. The proposed spatial pattern of development would reinforce unsustainable patterns of transport and travel. It would also focus more traffic on the already overloaded junction 13 whilst capacity exists at junction 12.</p> |

Summary of issues raised:

- Plan lacks reference to new strategic infrastructure e.g. recognition of the importance of park and ride provision in the Reading area.
- SA/SEA of strategic policies needs to be reviewed after completion of the Strategic Transport Analysis
- In regard to Strategic Road Network, clarity sought on what is meant by 'a suitable mitigation package'
- Opportunities to support sustainable transport and specifically encourage modal shift have been missed.
- Modelling needs to be re-run using the best national post-pandemic traffic data and the proposed LPR allocations.
- LPR should include a specific plan for the widespread availability of electric charging points
- Unclear when a Transport Assessment of Statement should be applied for non-residential development
- Requirements of this policy are not proportionate and fail to reflect the rural nature of much of West Berkshire.

- The proposed spatial pattern of development would reinforce unsustainable patterns of transport and travel and focus more traffic on overloaded junction 13 whilst capacity exists at junction 12.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: SP24 Infrastructure requirements and delivery

Number of representations received: 14

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|-------------------------------|---|
| Theale Parish Council | There is an urgent need for hospital/medical provision as local services are at capacity, which should be stated in the Plan. The text is vague and needs to be made clear, e.g. what is meant by adequate? The whole section is unrealistic and needs more detail. |
| Thatcham Town Council | Some key items of infrastructure required for the North East Thatcham development in SP17 are missing from the IDP update of January 2023. Major current infrastructure projects such as the redevelopment of the Newbury Lido are also missing, while some of the items in the IDP are not infrastructure projects at all. Policy SP24 aims to deliver the sufficient provision of infrastructure through the IDP, but clearly does not at present achieve this. Policy SP24 should define the responsibility within the Council for the maintenance of the IDP (including ensuring that it stays aligned with the pace of housing development) and the frequency with which it is reviewed. |
| Reading Borough Council (RBC) | RBC welcomes this policy, in particular the recognition that <i>“The Council will collaborate with other strategic policy making authorities to ensure that administrative boundaries do not restrict the delivery of the most appropriate infrastructure response.”</i> |
| Speen Parish Council | The IDP doesn't identify any accosts associated with health centres/improvements to address capacity and access – request this is addressed urgently. |

General Consultation Bodies:

| Consultee | Main issues |
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| NHS Property Services | Support principle of funding being allocated to health infrastructure. Vital that the NHS continues to receive a commensurate share of s.106 and CIL developer contributions to deliver necessary health infrastructure. |

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| | <p>Given their strategic importance, healthcare facilities should be given the same standing as affordable housing and public transport improvements when allocating funds.</p> <p>When setting planning obligation policies, we request that the council address local as well as strategic priorities and that the NHS is engaged as soon as possible.</p> |
| Berkshire, Oxfordshire and Buckinghamshire Integrated Care Board (BOB) | <p>Welcome opportunity to discuss being a recipient of CIL contributions towards primary care developments.</p> <p>Welcome opportunity to revise IDP so that a better understanding of primary care development costs can be incorporated into subsequent s. 106 agreements. Particularly if s.106 and CIL are replaced by an 'Infrastructure Levy'.</p> |

Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | <p>The outlines of an Infrastructure Plan should be included in the LPR, not the Infrastructure Delivery Plan.</p> <p>Educational institutions and medical facilities are just as important to the district as housing, landscape, heritage, business and transport.</p> <p>There should be specific reference to primary, secondary and tertiary education and the means to ensure their delivery.</p> <p>IDP incomplete with no funding for flood alleviation schemes for Newbury Clayhill and areas to the North. No details on upgrades required to address failing drainage on London Road Estates DEA.</p> <p>The figures for 8 football pitches at £1m are aspirational as the first one will require at least £3.7m.</p> |
| Liberal Democrat Group | <p>None of the post-WWII methods of capturing land value for public benefit have worked adequately and it is as yet unclear whether the Levelling Up & Regeneration Bill will result in a system which is any better than CIL. It is unclear what national policy currently is and therefore local policy SP24 cannot be deemed consistent with it.</p> <p>Appendix 1 to the IDP is seriously lacking in evidence of anything approaching a realistic cost estimate for the infrastructure projects listed as necessary for developments set out in the LDP. The Plan process should be paused until the IDP is at a more advanced stage.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|---|
| Boyer Planning for <ul style="list-style-type: none"> • Sovereign • Darcliffe Homes | Reference should be made within the policy to the need for any contributions required to the delivery of relevant infrastructure to be consistent with the tests at Section 122 of the Community Infrastructure Levy Regulations (2010) (as amended). |
| Nexus Planning for Croudace Homes | The infrastructure requirements for Thatcham are likely to lead to delays in its delivery and potentially threaten viability, which justifies the allocation of smaller, less constrained sites to fill the gap. |

Summary of issues raised:

- Urgent current need for hospital/medical provision not addressed
- Given their strategic importance, healthcare facilities should be given the same standing as affordable housing and public transport improvements when allocating funds.
- Should be specific reference to primary, secondary and tertiary education and the means to ensure their delivery.
- Key items of infrastructure are missing from IDP, including those required for the North East Thatcham development, and IDP lacking evidence of realistic cost estimates.
- Reference to consistency with the tests at Section 122 of the CIL Regulations (2010) (as amended) should be made within the policy.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA1 Land north of Newbury College, Monks Lane, Newbury**

Number of representations received: 3

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | Newbury STW is currently at around 98% of its dry weather flow - DWF capacity, and the development planned to drain to the STW would take it over capacity. Therefore, would not support any additional flows entering - the Newbury STW, a known high spiller until significant work has been done to tackle the causes of the frequent spills. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA1. |
| Historic England | Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. |

General Consultation Bodies: None**Other Stakeholders:** None**Landowners, site promoters and developers:**

| Consultee | Main issues |
|-----------------------------------|--|
| Pro Vision for Feltham Properties | Sandleford approved scheme differs from the approved master plan, leaving a slice of land within the settlement boundary that is neither part of the Sandleford masterplan, not within the RSA1 allocation. This land could be included in the RSA1 allocation to make best use of the land. |

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| Turley for Hathor Property | <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been ‘carried over’ from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement. This is a site allocation being carried over from the Housing Site Allocations DPD (adopted 2017) for approximately 15 dwellings.</p> <p>Planning status: The site benefits from outline permission (application reference 19/00669/OUTMAJ) for 16 dwellings dated August 2019, and reserved matters approval dated January 2021 (application reference 20/00346/RESMAJ). The AMR 2022 states that there is a delay in development due to a revised scheme incorporating additional land and increased number of dwellings. Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period.</p> <p>The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p> |
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Summary of issues raised:

- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.
- Thames Water notes that supply upgrades likely to be required.
- Environment Agency notes that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Site promoter request to include an additional parcel of land within the site allocation boundary.
- Concern from a promoter of another site over the uncertainty of the delivery of this site

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA2 Land at Bath Road, Speen, Newbury**

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|----------------------|---|
| Speen Parish Council | Recognise that the site has outline planning permission, but are concerned and remain opposed to the current access onto the A4. |
| Environment Agency | The site would require an FRA. Newbury STW is currently at around 98% of its dry weather flow - DWF capacity, and the development planned to drain to the STW would take it over capacity. Therefore, would not support any additional flows entering - the Newbury STW, a known high spiller until significant work has been done to tackle the causes of the frequent spills. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy text for site RSA1. |
| Historic England | Allocation may impact on a conservation area. Lack of CAA and general lack of heritage assessment makes the allocation unsound as it is not based on proportionate evidence required by NPPF35. Site's proximity to the Conservation Area not mentioned in the SA. Particular sensitivities in the South West of the site, and western approach to the CA. Support criterion d, however, the terminology relating to archaeological assessments could be more consistent across the development management policies. Supports Criterion j. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. Recommend liaison with Thames Water at earliest opportunity. |

General Consultation Bodies: None**Other Stakeholders:** None

Landowners, site promoters and developers: None

Summary of issues raised:

- Allocation currently unsound due to lack of Conservation Area Appraisal and heritage assessment
- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.
- Thames Water notes that supply upgrades likely to be required.
- Environment Agency notes that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Parish Council concerned with access onto the A4

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA3 Land at Coley Farm, Stoney Lane, Newbury**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|--|
| Environment Agency | Would not support any additional flows entering the Newbury STW, a known high spiller until significant work has been done to tackle the causes of the frequent spills. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy text. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. |

General Consultation Bodies: None**Other Stakeholders:** None**Landowners, site promoters and developers:**

| Consultee | Main issues |
|--|--|
| Southern Planning Practice for Saunders Family | Due to advanced stage in the planning process, it is considered that this site is retrospective which does not constitute good plan-making. Request the allocation is removed. If this allocation is removed, it will need to be replaced by another similar allocation. It is considered that Land East of Stoney Lane (CA9) provides a logical extension to the previous allocation and should be considered for allocation. The land east of Stoney Lane is a suitable, sustainable site which, through allocation, would deliver homes within the first five years of the plan period. |

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| Turley for Hathor Property | <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been ‘carried over’ from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.</p> <p>Planning status: A full application has been approved in June 2021 (application reference 20/00604/FULEXT). A review of WBC’s online application search demonstrates that several discharge of condition applications have been approved. From a review of Google maps, no development has commenced on site. Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period. The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p> |
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Summary of issues raised:

- Thames Water notes that supply upgrades likely to be required.
- Environment Agency notes that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Comment from the site promoter that the site is allocated retrospective to planning permission and so should be removed.
- Concern from a promoter of another site over the uncertainty of the delivery of this site

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA4 Land off Greenham Road, South East Newbury**

Number of representations received: 2

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|--|
| Environment Agency | This site would require a Flood Risk Assessment. This site is partly located atop a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. See the Environment Agency's Approach to Groundwater Protection guidance which highlights requirements for developments on landfill sites. Would not support any additional flows entering the Newbury STW, a known high spiller until significant work has been done to tackle the causes of the frequent spills. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy text. |
| Thames Water | Development likely to require upgrades to the water supply and wastewater networks, including sewerage treatment infrastructure. |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

- Environment Agency notes that an FRA would be required and that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water notes that upgrades required to water supply and wastewater networks, including sewerage treatment infrastructure.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA5 Land at Lower Way, Thatcham**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|-----------------------|--|
| Thatcham Town Council | Planning permission has been granted without requested cycle linkages and with only a single access. Policy should be amended in line with the approved scheme. Suggested policy wording provided. |
| Theale Parish Council | The additional traffic will impact on Theale's roads and infrastructure. The A4 already floods and additional development will exacerbate this. |
| Environment Agency | This site is partly located atop a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. See the Environment Agency's Approach to Groundwater Protection guidance which highlights requirements for developments on landfill sites. Would not support any additional flows entering the Newbury STW, a known high spiller until significant work has been done to tackle the causes of the frequent spills. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy text. |
| Historic England | Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. Recommend liaison with Thames Water at earliest opportunity. |

General Consultation Bodies: None**Other Stakeholders:** None**Landowners, site promoters and developers:** None

Summary of issues raised:

- Traffic will impact other parishes linked by the A4 such as Theale
- Environment Agency notes that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water notes that upgrades required to water supply networks
- Thatcham Town Council comments that the Policy should reflect already approved scheme

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA6 Stoneham's Farm, Long Lane, Tilehurst**

Number of representations received: 3

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | We assume wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. |

General Consultation Bodies:

| Consultee | Main issues |
|------------------|--|
| Woodland Trust | Support policy requirement for protection of ancient woodland in line with the NPPF. |

Other Stakeholders: None

Landowners, site promoters and developers:**Summary of issues raised:**

- Woodland Trust supports policy requirement for protection of ancient woodland.
- No concerns from Thames Water or the Environment Agency

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA7 72 Purley Rise, Purley on Thames**

Number of representations received: 2

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | We assume wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. Recommend liaison with Thames Water at earliest opportunity. |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

- No concerns from Thames Water or the Environment Agency

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA8 Land adjacent to Bath Road and Dorking Way, Calcot**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------------|---|
| Theale Parish Council | This is on a flood plain and will impact on flooding in the surrounding area. Proximity to the M4 means it will suffer from air and noise pollution. |
| Holybrook Parish Council | The permitted development is in stark contrast to the existing character and design of Holybrook, which detracts and changes the shape and character of the area. |
| Environment Agency | We assume wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Thames Water | No likely infrastructure concerns regarding water supply. Development likely to require upgrades to wastewater network, including sewerage treatment infrastructure. |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

- Theale Parish Council concerns about noise and air pollution from M4 and that it will increase flood risk

- Concerns regarding character and design from Holybrook Parish Council
- Thames Water notes that upgrades to wastewater infrastructure, including sewerage treatment infrastructure required

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA9 Land between A340 and The Green, Theale**

Number of representations received: 9

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|-----------------------|---|
| Theale Parish Council | Objects due to increased traffic, flood risk, traffic, congestion, air/noise pollution, demand on medical services. |
| Environment Agency | This site is partly located atop a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. See the Environment Agency's Approach to Groundwater Protection guidance which highlights requirements for developments on landfill sites. We assume wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Historic England | Text should refer to the Grade II listed milestone in the north east corner. The plan should explicitly commit to its conservation, preferably in policy. Suggested wording provided. The plan would be improved by reference to Grade II listed Englefield House North West of the allocation. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. Recommend liaison with Thames Water at earliest opportunity. |

General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | Pressure on local infrastructure, particularly schools, doctors. Theale high street already suffers from congestion which will become worse. |

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| | Theale cannot sustain any more housing developments. Traffic impacts exacerbated by the North East Thatcham allocation. |
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Landowners, site promoters and developers:

| Consultee | Main issues |
|----------------------------|---|
| Turley for Hathor Property | <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been 'carried over' from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.</p> <p>Planning status: Outline application 17/02904/OUTMAJ for up to 104 dwellings approved December 2020. No reserved matters application submitted and the outline permission will lapse imminently. The lack of delivery at this site has been subject to much discussion, and its ability to be brought forward continues to be subject to debate. Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period. The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p> |

Summary of issues raised:

- Historic England concern that the policy should make particular reference to the listed milestone on the site and its setting and also the nearby Registered Park and Garden of Englefield House
- Concern from Theale Parish Council and local residents about the pressure on local infrastructure (schools, doctors, etc.), an increase in flood risk, traffic impacts and an increase in noise and air pollution
- Thames Water notes that upgrades to wastewater infrastructure, including sewerage treatment infrastructure required
- Concern from a promoter of another site over the uncertainty of the delivery of this site

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA10 Whitehart Meadow, Theale**

Number of representations received: 36

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|-----------------------|---|
| Theale Parish Council | Restriction to two storeys is inconsistent with the specifications to preserve character. Access is proposed from High Street which already cannot cope with traffic volumes and is single file. Reference to Whitehart Meadow has been struck out and a reason should be given as to why. Landscape Assessment should be referred to. |
| Environment Agency | Supports the limitation of development to Flood Zone 1 on this site as this is in line with the sequential approach to development. The Sulham brook which runs along the site is a main river and a headwater and is home to Brown Trout and Bullhead that makes it more ecologically important, therefore apart from the provision of a 10m buffer, an ecological assessment should be provided. Assumes wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Historic England | Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Thames Water | Scale of development is likely to require upgrades of the water supply network infrastructure. Do not envisage infrastructure concerns regarding wastewater capability. Based on foul flows connecting to the public sewer and no surface water being discharged to the public sewer. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------|---|
| Avison Young for National Grid | Site is crossed or in close proximity to National Grid assets (overhead transmission line). It is National Grid policy to retain existing overhead lines in-situ. National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promotes the successful development of sites crossed by overhead lines and the creation of well-designed places. Statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | <p>Significant proposal in addition to already significant number of homes permitted but yet to be built.</p> <p>The current Core Strategy requires a period of consolidation to upgrade facilities and services if the development goes ahead – no justification as to why this requirement has not been carried forward to the Local Plan Review.</p> <p>Site has not been included in the Strategic transport Model or Air Quality Assessment. Thus, traffic generation and resulting air quality impact has not been assessed.</p> <p>Pressure on infrastructure (GP, school, high street facilities, water and wastewater treatment).</p> <p>Traffic from this site and RSA11 will make local road congestion even worse. Access issues to site from High Street.</p> <p>Would eliminate 'green route' used to commute across to PROW and across the M4.</p> <p>Object to the site</p> <p>Need to preserve gap between Theale and Calcot/Tilehurst</p> <p>Impact on AONB</p> <p>Impact on Theale High Street Conservation Area</p> <p>Impact on surrounding housing</p> <p>Impact on infrastructure and amenities</p> <p>Loss of green space, which is important for recreation, children's play, health and well-being, and habitat for wildlife.</p> <p>Sites proposed as wildflower meadows.</p> <p>Not foster community cohesion</p> <p>Would not conserve or enhance the character or identity of the village.</p> <p>Would not make use of previously developed land.</p> <p>No regular public transport links compared with other rural service centres, leading to car use.</p> <p>Area at flood risk, with development increasing risk. Development would impact on existing properties (insurance premiums and making harder to sell).</p> |

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| | <p>More suitable alternative sites with lesser impacts than Whitehart Meadow (at The Green) Would remove the buffer between the M4 and existing houses, increasing noise and reducing air quality. Increase in light pollution. Does not comply with strategic policies in the LPR. Theale should not have to meet Reading's or any other local authority's housing needs. Theale does not have a housing need, and thus the development would not serve local people. Site has not been initiated by local communities, contravening Council's objective. No circumstances to justify loss of trees, woodland, important hedgerows. Adverse impact on neighbour amenity. Create burden to Aldermaston and Burghfield AWE, as within 12km consultation zone. Agricultural land should be protected. Contravenes the effective use of previously developed land. Will affect the rural character of the area and remove village feel. The area does not need regenerating due to recent redevelopment and upgrades. The development will affect wildlife habitat, species conservation and climate change. Traffic congestion, including access for emergency vehicles is already an issue and will be exacerbated. The site is not well connected, accessible, safe or easy to find. Will cause resentment from existing residents. Proposal would destroy an irreplaceable habitat. There would not be an appropriate buffer between the site and designated biodiversity sites. SP11 - Will not secure opportunities for biodiversity net gain. Unacceptable increase in pollution from light, noise, dust, vibration and odour. Impacts on water and sewerage network. Loss of daylight and overlooking/loss of privacy, enclosure, overbearing for existing residents. High voltage overhead powerlines. Possible land contamination. 50% must be social housing, and should not just be flats. Amenity space must be provided for social housing.</p> |
| Cllr Alan Macro | <p>The Lakeside site has outline planning permission for up to 325 units and RSA9 has outline permission for 104 houses. These two sites will increase the number of homes in Theale by almost 25% when built out. Theale will still need that "period of consolidation", recognised in Section 4.35 of the Core Strategy, once construction at Lakeside has been completed.</p> <ul style="list-style-type: none"> • This site is important to the setting of Theale and to its maintenance as a separate settlement. • The site is bounded by the M4 motorway and the elevated A4. Residents on the site would be subject to significant noise and air pollution. |

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| | <ul style="list-style-type: none"> • High voltage power lines cross the site. In addition to visual intrusion and danger of electrocution, scientific research shows that they generate ozone and nitrogen oxide air pollution • The site suffers from groundwater flood risk and much of it is in flood zone 2. • High groundwater levels (25cm blow ground level according to the Drainage Officer’s comment in the HELAA) preclude infiltration as a SUDS solution. • The site is the source of the Sulham Brook and the high peat content of its soil attenuates surface water run-off into the brook. Any development of the site would significantly reduce this attenuation and increase the flood risk downstream • Would add to congestion in the High Street, at the Hoad Way/A4 roundabout and at M4 J12. It would also exacerbate traffic problems elsewhere in the highway network in Theale • The use identified in the HELAA is “Employment uses (B2/B8)”. Residential use is therefore contrary to policy SP1 of this plan which states that “allocations will be related to the role and function of settlements and the development opportunities identified through the HELAA”. • The reasons for removing this site from the Housing Site Allocations DPD are still valid • The site is not included in the West Berkshire Strategic Traffic Model or Air Quality Assessment • The subsoil has a high peat content. Peat is a major store of carbon. Excavation of the soil would therefore release CO2 into the atmosphere and exacerbate climate change. This would be contrary to policy SP5 of this LPR • This site is very close to the A4 and M4 Junction 12. This means that many journeys will be by private car, which makes the site not sustainable • Disagree with SA/SEA assessment of site. <p>Site RSA10 should be removed.</p> |
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Landowners, site promoters and developers:

| Consultee | Main issues |
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| Bell Cornwell for Central Corporation Projects Ltd | <ul style="list-style-type: none"> • Support the proposed allocation but challenge the reduction in units to 40 and the size of the allocation. A revised indicative masterplan illustrates how to ensure effective use of land, with suggested dwelling number of 72 on a site area of 3.17ha with a density of approximately 23 dph. • The Environment Agency has reclassified the flood risk of the site and updated the national flood maps. Thus the issue for the previous residential planning application in 2017 has been addressed. • RSA11 has an unresolved access issue, which could be addressed by the consideration of an access through the site. |

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| | <ul style="list-style-type: none"> • Site benefits from an extant consent for a 160 bed hotel, which has had the access and bridge constructed. Development extends beyond the overheard pylons. • Reg 18 assessed the site as suitable for residential development for approximately 100 dwellings, and the site promoter evidenced that up to 134 units could be delivered. • The updated masterplan has been based on a LVIA, which conserves and enhances the landscape adjacent to the AONB, and retains the individual identity of settlements, maintaining a sense of separation between Theale and Calcot. The development would provide a transition of development between the settlement and the countryside by a proposal designed around more family housing, 2 storeys in height, rather than the 3 storeys previously proposed. • The area would be enhanced, with a buffer maintaining the separation to the AONB, and considers a more comprehensive development alongside RSA11, with a possible future access and amenity space. • 30% affordable homes (on brownfield land) would be provided, and may be an element of self-build and custom-build. The development would be viable. • Parking would accord with the Council's policy, with electric charging points. • Masterplan is supported by a Level 2 Flood Risk Assessment and Drainage Strategy; Transport Assessment and Workplace Travel Plan; Preliminary Noise Impact Assessment; Revised Landscape and Visual Impact Assessment and a Landscape Strategy; Ecological appraisal. • In terms of the SA/SEA the landscape sensitivity and capacity assessment for the site and HELAA it may be best to state that the developable area lies within Flood Zone 1, as the flood zone challenge is historic. • Support that the development is considered viable and that the site is in single ownership with development coming forward over the next five year period. |
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Summary of issues raised:

There are many concerns expressed from local residents about the impact of the development, particularly in combination with RSA11. These include

- Concern from a number of local residents about the pressure on local infrastructure (schools, doctors, etc.), an increase in flood risk, traffic impacts and an increase in noise and air pollution.
- Theale Parish Council expressed continued concern about access to the site
- The impacts on the landscape character of the area, including the AONB, biodiversity and green infrastructure were additional concerns raised, together with the erosion of the settlement separation between Theale and Calcot.
- Environment Agency supports the limitation of development to Flood Zone 1
- Thames Water notes that the scale of development is likely to require upgrades to the water supply network infrastructure
- National Grid assets need consideration
- Site promoter considers the opportunity should be taken to make efficient use of land, with supporting evidence provided.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: RSA11 Former Theale Sewage Treatment Works, Theale

Number of representations received: 33

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|-----------------------|---|
| Theale Parish Council | Regarding point c- 'desk based' assessment is not adequate and a survey should be carried out. Access onto Blossom Lane is not suitable, there are traffic issues already and pedestrians will not be able to pass due to the narrow nature of the lane. The site was removed from the last plan as it was not suitable, and should be removed from this plan. The water main is not mentioned and needs to be. Sulham Brook is a main river and a 10m buffer is not sufficient; it should be a minimum of 30m. Object due to increased flood risk. |
| Environment Agency | The site is partly Flood Zone 2. The Sulham Brook which is located some distance from the site is a main river and a headwater and is home to Brown Trout and Bullhead that makes it more ecologically important, therefore apart from the provision of a 10m buffer, an ecological assessment should be provided. Assumes wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Historic England | Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Thames Water | Scale of development is likely to require upgrades of the water supply network infrastructure. Do not envisage infrastructure concerns regarding wastewater capability. Based on foul flows connecting to the public sewer and no surface water being discharged to the public sewer. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | <p>Flood risk to this site and risk of high voltage overhead power lines.</p> <p>Proximity to the motorway means that assessment of noise and pollution should be undertaken. The site should be included in the Air Quality Assessment.</p> <p>The site is contaminated from its previous land use as a sewage works.</p> <p>The site has not been included in the Strategic transport Model, meaning that the effect of traffic from the site has not been assessed.</p> <p>Local roads (Blossom Lane & Chestnut Close) are unsuitable for additional traffic.</p> <p>Infrastructure unable to cope with additional demand.</p> <p>The site is full of wildlife - currently home to wild deer, hedgehogs and other animals.</p> <p>Theale high street already suffers from congestion which will become worse.</p> <p>Access road is not suitable – single track road used by pedestrians and additional traffic will create risk.</p> <p>No access for buses to serve the new development.</p> <p>The additional houses will cause the village to lose its character and spirit, making Theale another suburb of Reading.</p> <p>Loss of green space, which is important for recreation, children’s play, health and well-being, and habitat for wildlife.</p> <p>Would not make use of previously developed land.</p> <p>No regular public transport links compared with other rural service centres, leading to car use.</p> <p>Area at flood risk, with development increasing risk. Development would impact on existing properties (insurance premiums and making harder to sell).</p> <p>More suitable alternative sites with lesser impacts than the Sewage Treatment Works (at The Green)</p> <p>Would remove the buffer between the M4 and existing houses, increasing noise and reducing air quality. Increase in light pollution.</p> <p>Impact on views and living standards for surrounding residents.</p> <p>Negative impact on working standards and working environments.</p> <p>Visual impact will affect outlook of village on approach.</p> <p>Additional approved housing in Theale and this development will place unacceptable strain on local infrastructure – G.P, school.</p> <p>Does not comply with strategic policies in the LPR.</p> <p>Theale should not have to meet Reading’s or any other local authority’s housing needs. Theale does not have a housing need, and thus the development would not serve local people.</p> <p>Site has not been initiated by local communities, contravening Council's objective.</p> <p>No circumstances to justify loss of trees, woodland, important hedgerows.</p> <p>Adverse impact on neighbour amenity.</p> |

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| | <p>Create burden to Aldermaston and Burghfield AWE, as within 12km consultation zone. Contravenes the effective use of previously developed land. Will affect the rural character of the area and remove village feel. The area does not need regenerating due to recent redevelopment and upgrades. No regular public transport links, unlike other rural service centres. The development will affect wildlife habitat, species conservation and climate change. Traffic congestion, including access for emergency vehicles is already an issue and will be exacerbated. The site is not well connected, accessible, safe or easy to find. Will cause resentment from existing residents. Proposal would destroy an irreplaceable habitat. There would not be an appropriate buffer between the site and designated biodiversity sites. SP11 - Will not secure opportunities for biodiversity net gain. Unacceptable increase in pollution from light, noise, dust, vibration and odour. Impacts on water and sewerage network. Loss of daylight and overlooking/loss of privacy, enclosure, overbearing for existing residents. High voltage overhead powerlines. 50% must be social housing, and not just flats. Amenity space must be provided for social housing. Agricultural land should be protected from development.</p> |
| <p>Cllr Alan Macro</p> | <p>The Lakeside site has outline planning permission for up to 325 units and RSA9 has outline permission for 104 houses. These two sites will increase the number of homes in Theale by almost 25% when built out. Theale will still need that “period of consolidation”, recognised in Section 4.35 of the Core Strategy, once construction at Lakeside has been completed.</p> <p>The site is bounded by the M4 motorway and the elevated A4. Residents on the site would be subject to significant noise and air pollution.</p> <ul style="list-style-type: none"> • High voltage power lines run past the site. In addition to visual intrusion and danger of electrocution, scientific research shows that they generate ozone and nitrogen oxide air pollution • The site is severely contaminated from its history as a sewage works and as a depot. The cost of decontamination could make the provision of affordable housing on the site unviable, and perhaps make development of the site unviable. • A large proportion of the site is in flood zone 2. The site also is at risk from surface water and groundwater flooding • The access to the site would be from the single-track end of Blossom Lane. Blossom Lane is very narrow in places and also has narrow footways. The combination of increased pedestrian traffic and narrow and missing footways with increased vehicle movements caused by the development would pose serious road safety dangers. |

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| | <ul style="list-style-type: none"> • The majority of traffic accessing the site would use Crown Lane. Extra traffic movements would lead to congestion. • The reasons for removing this site from the Housing Site Allocations DPD are still valid • The site is not included in the West Berkshire Strategic Traffic Model or Air Quality Assessment • The subsoil on the site is made up of peat - carbon would be released as CO2 when excavated to build out the site, exacerbating climate change contrary to policy SP5 of this LPR • This site is very close to the A4 and M4 Junction 12. This means that many journeys will be by private car, which makes the site not sustainable • Disagree with SA/SEA assessment of site <p>Site RSA11 should be removed.</p> |
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Landowners, site promoters and developers:

| Consultee | Main issues |
|-----------------------------|--|
| Thames Water (as landowner) | Fully supports the allocation of the former Theale STW for residential development but concerned about the reduction in the developable area. Considers that open space/landscaping/BNG could go beyond the pylons. Suggested amendment in representation. |

Summary of issues raised:

There are many concerns expressed from local residents about the impact of the development, particularly in combination with RSA10. These include

- Concern from a number of local residents about the pressure on local infrastructure (schools, doctors, etc.), an increase in flood risk, traffic impacts and an increase in noise and air pollution.
- Theale Parish Council expressed continued concern about access to the site
- The impacts on the landscape character of the area, including the AONB, biodiversity and green infrastructure were additional concerns raised, together with the erosion of the settlement separation between Theale and Calcot.
- Thames Water notes that the scale of development is likely to require upgrades to the water supply network infrastructure
- Site promoter considers the opportunity should be taken to make efficient use of land, with supporting evidence provided.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA12 Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common**

Number of representations received: 6

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|-----------------------|---|
| Theale Parish Council | Objects as an increase in population here would likely use Theale's facilities which are already struggling. |
| Environment Agency | The policy requires an ecological impact assessment and the avoidance of the adverse impacts on protected habitats/species. It will be useful to require a protected species survey as well. This is a large development compared to the size of the receiving Burghfield STW. Burghfield is a high spiller, mostly due to Ground Water infiltration. Would not support a large development within this catchment as it will lead to higher frequency of spills. Burghfield STW does not have a permitted phosphorus discharge value now. There are options to tighten permit limits at Burghfield to mitigate the impact of the development. |
| Historic England | Supports the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------------|--|
| RPS for Atomic Weapons Establishment | AWE objects to the re-allocation of land adjoining Pondhouse Farm, Clayhill Road. Despite this allocation being within the current local plan, due to the redefining of the DEPZ during the plan period, this allocation for 100 residential units would now be in direct contravention of SP4 as the site is located within the Burghfield DEPZ |
| Woodland Trust | Support policy requirement for protection of ancient woodland in line with the NPPF. |

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| | However, the site plan shows the ancient woodland further from the red line boundary whereas the ancient woodland inventory shows it directly adjacent – this should be corrected in the final version of the plan. |
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Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

- Historic England requests for consistent language relating to archaeological assessment across the site allocation policies.
- Objection from AWE as redefinition of the DEPZ for AWE means the site now directly contradicts SP1.
- Thames Water notes that the scale of development is likely to require upgrades to the water supply network infrastructure
- Woodland Trust supports protection for ancient woodland but boundaries should be corrected.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA13 Land north of A4 Bath Road, Woolhampton**

Number of representations received: 12

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|--|
| Historic England | Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Environment Agency | The site is on SPZ3. No further comments |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. Recommend liaison with Thames Water at earliest opportunity. |

General Consultation Bodies:

| Consultee | Main issues |
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| Woodland Trust | Support policy requirement for protection of ancient woodland in line with the NPPF. |

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | The plan for these 16 houses has been rejected already and has been refused on appeal. Traffic impact at A4 junction. Already overburdened Waste Water Treatment Works in Woolhampton. Environmental impact on wildlife, flora, fauna and habitats. Adjacent ancient woodland - how is buffer implemented? |

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| | <p>Reduction in much needed farmland Proposed educational and health provision not clear Consideration has not been given to the previous objections The site was refused planning permission in May 2022. There was a serious road traffic accident at the entrance in December 2022. Significant ice on surrounding roads in cold weather. Significant additional development also on the A4 at Thatcham. Biodiversity loss on the site. Development of the site will impact flood risk of surrounding properties. Flooding is an annual occurrence in the locality. Increased traffic on already busy A4. Traffic build up will be caused by cars waiting to access the site. The current infrastructure in Woolhampton is not sufficient to accommodate additional dwellings along with already approved development. E.g. the primary school is already at maximum capacity. Inevitable change in landscape character of the village. Little regard for nature conservation issues, including protected species. If nothing has changed, surely the original decision (of refusal) should be upheld. Repeated pattern of poor consultation with residents regarding this site. Allocation doesn't take into account other significant development in the village and pressure on local infrastructure. No evidence there has been a cross-boundary approach between parishes Midgham and Woolhampton, therefore the policy is not sound. Woolhampton is a beautiful village constantly losing green land to housing. Planning applications for the site have already been rejected twice. Will add additional pressure on village amenities and cause damage to local wildlife, habitats, and rural character of the village. Will cause additional light pollution. Additional drainage and waste water will increase pressure on the sewerage network, plus additional risk to the River Kennet SSSI. Adding a new junction to the A4 will create complexity and risk and ultimately will prejudice road safety, including for pedestrians trying to cross the road. Incremental development is slowly chipping away at the beauty of the area.</p> |
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Landowners, site promoters and developers:

| Consultee | Main issues |
|---------------------------------------|---|
| Woolf Bond Planning for JPP Land Ltd. | Concur that the site is suitable for development. |

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| | <p>The HELAA does not fully take into account the information submitted with the application regarding nature conservation constraints and landscape impacts.</p> <p>Criterion j regarding odour assessment is not justified by evidence such as prevailing wind direction and explanation of 800m buffer from existing treatment works. Also due to the fact that an odour assessment is not required for similarly assessed sites in the Phase 2 Water Cycle Study. Either all allocations listed in Table 2 of Phase 2 water cycle study should include a requirement for an odour assessment, or none should.</p> <p>Heritage and Mineral Assessments are not required for the site as determined through a previous planning application. Therefore Criteria I – k should be removed from the policy.</p> |
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Summary of issues raised:

- Many concerns from local residents including impact on local infrastructure, traffic, water quality, flood risk, biodiversity, light pollution and loss of rural character
- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.
- Support for protection of ancient woodland from the Woodland Trust
- No concerns from Thames Water or the Environment Agency
- Site promoter support for site although does not consider odour assessment, heritage and mineral assessments are justified.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA14 Land adjoining Lynch Lane, Lambourn**

Number of representations received: 8

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---|---|
| Lambourn Parish Council & Lambourn NDP Steering Group | The site is in a sensitive location (River Lambourn SAC Nutrient Neutrality Zone) and at the current level of housing is not deliverable over the plan period. A fewer number of houses (30) could be acceptable. WBC has not sought alternative sites at this location. The LPR requires the LNDP to find 'additional' sites, not 'alternatives'. |
| Environment Agency | The site is partly Flood Zone 2+3. Developments connecting to East Shefford STW may be problematic. The River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. Would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy text. |
| Historic England | Supports the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. |

General Consultation Bodies: None**Other Stakeholders:** None**Landowners, site promoters and developers:**

| Consultee | Main issues |
|-------------------------------------|--|
| Thakeham Homes | The site has not commenced, and successive Annual Monitoring Reports fail to give any justification. The Council should not just allow these allocations to roll forward unless there is a reasonable prospect of them being delivered, or at least supporting them with additional allocations should they continue to prove undeliverable |
| Carter Planning for Mr. R L A Jones | <p>Site is too large for the village to accommodate, and capacity has risen arbitrarily since 2014, but constraints have increased.</p> <p>Part of the site is liable to flooding.</p> <p>No work carried out on a number of aspects, including archaeology.</p> <p>Site constraints suggest the allocation should be reduced.</p> <p>Previous concerns regarding the environment, housing and community, industry, archaeology and roads have not been addressed.</p> <p>The site is trying to compensate for the unjustified omission of LAM007.</p> <p>The site has not come forward and no applications have been made; it does not appear to be genuinely available and should be omitted.</p> |
| Turley for Hathor Property | <p>It is important to assess the progress and delivery of the sites identified in the LPR to meet housing requirements, in order to ensure there is sufficient certainty. This is particularly the case where allocation have been 'carried over' from the previous adopted Core Strategy. These amount to 2,652 dwellings, and represent a significant proportion of the overall housing requirement.</p> <p>Planning status: No planning application submitted at the current time. Based on the above, there remains some uncertainty regarding delivery from these existing long-standing allocations, particularly during the first five years of the LPR period. The LPR is clear that Newbury is the primary settlement in the District and has the greater potential to deliver sustainable development, yet it is not the primary focus for the proposed housing allocations. In order to secure a more balanced approach to delivering sustainable development across the LPR plan period, and to assist in delivery of a likely shortfall in housing in the short term, Newbury is well placed to accommodate further allocations.</p> |

Summary of issues raised:

- The Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water noted that upgrades would be required to the water supply network.

- Concern from Lambourn Parish Council and NDP Group that the current level of housing is undeliverable but that a smaller number could be acceptable
- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.
- Concern from the promoters of other sites over the uncertainty of the delivery of this site

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA15 Land at Newbury Road, Lambourn**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|--|
| Historic England | Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Environment Agency | |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. Recommend liaison with Thames Water at earliest opportunity. |

General Consultation Bodies: None**Other Stakeholders:** None**Landowners, site promoters and developers:**

| Consultee | Main issues |
|------------------------------------|---|
| Carter Planning for Mr R L A Jones | Site HSA 20 should be deleted. It did not go through the rigorous consultation process or selection procedure applied to other sites such as our Client's LAM007. Its impact on the landscape was never adequately assessed. It is further from services than LAM007 and has a number of other disadvantages. It is not practical or available for development currently. Should be replaced by our Clients previously preferred Option Site "Land between Folly Road, Rockfel Road and Stork House Drive" (SHLAA site reference LAM007). Site has not come forward and previous planning applications have been refused or unimplemented. Suggests the site is not practical or economic to develop. Insufficient landscape assessment. Parish Council were not consulted. Impacts on landscape, including AONB. Very small, inflexible site which makes little difference to housing delivery. Site is trying to |

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| | compensate for the unjustified omission of LAM007. Site was selected at a late stage. Site has no clear northern boundary. |
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Summary of issues raised:

- The Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water have no concerns
- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.
- Concern from the promoter of another site over the uncertainty of the delivery of this site

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA16 Land North of Southend Road, Bradfield Southend**

Number of representations received: 3

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | We assume wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. |

General Consultation Bodies: None**Other Stakeholders:** None**Landowners, site promoters and developers:**

| Consultee | Main issues |
|---------------------------|--|
| Pro Vision for Rivar Ltd. | In principle support for policy. A number of criteria require submission of information with a planning application or consideration of other policies in the Development Plan – these could be removed as the required information is covered by the local validation list and the plan should be read as a whole. Criteria f – support the principle, but the accompanying site boundary does not extend to the existing northern tree belt which could lead to uncertainty. The red line should be extended to the tree belt. Criteria l – fails to consider the site and village context and modest scale and rural character of the development. Should be reworded to include ‘where feasible’. Alternative wording provided. |

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| | Would be willing to enter into a Statement of Common ground to support the site's allocation. The proposed amendments to the criteria could be dealt with through minor modifications. |
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Summary of issues raised:

- No concerns from either the Environment Agency or Thames Water
- Site promoter support for policy, with some amendments to the criteria suggested

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA17 Land at Chieveley Glebe, Chieveley**

Number of representations received: 13

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------------|--|
| Chieveley Parish Council | <p>Of the currently potentially developable sites, RSA 17 is most likely to be acceptable. Agrees that the larger area of land RSA26 should not be developed. Supports RSA17 criteria (a) to (i). However, the allocation is unsound with regards to several aspects. It is not clear how specific design aspects are to be dealt with. The vision, expectations and assurances for this site lack clarity. A footway must be provided but the means of achieving the required footpath improvements along the frontage are unclear and removal of existing vegetation seems likely. More detail required. No site area is specified. The limit of 15 dwellings is justified and must be adhered to and the explanatory text must remain on this point. Many concerns about existing traffic problems in Chieveley which will be exacerbated. Access from East Lane to High Street and Oxford Road have poor sight lines. Multiple accesses will likely necessitate removal of the mature hedgerow; alternative access arrangements should be given consideration. A specific footpath through the proposed site and diocese land to the recreational centre should be included to improve community infrastructure links and to other PRowS (map supplied). Essential that the site does not close off PRow infrastructure improvements for the village. Welcome confirmation by Diocese of Oxford to provide land for a burial ground. At least 40% should be affordable housing.</p> |
| Environment Agency | <p>Developments connecting to Chieveley STW may be problematic as it discharges into the River Lambourn SAC which is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all</p> |

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| | proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy |
| Historic England | Allocation may impact on a Conservation Area. Lack of Conservation Area Appraisal (CAA) and general lack of heritage assessment makes the allocation unsound as it is not based on proportionate evidence required by NPPF35. A Heritage Impact Assessment would enable further consideration of the relationship between the site and nearby heritage assets. The HELAA site assessment recommends some archaeological work to be undertaken but this is not included in the criteria – should be added (suggested wording provided). |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | <p>Number of accesses is excessive - a single access with an enlarged road area opposite Hazeldene would be provide the safest access.</p> <p>Access onto old Oxford Road from East Lane is poor and there will be a heightened risk of accidents.</p> <p>Proposed accesses would also destroy the ancient frontage hedgerow, including through the provision of visibility splays.</p> <p>The western most access would require a visibility splay over my clients land, therefore it is not available, and the development as proposed cannot be achieved.</p> <p>A historical plan by the Diocese in 1994 shows only one access of East Lane (map supplied).</p> <p>The additional proposed development means that a pedestrian walkway/pavement should be provided along East Lane. Road is too narrow for a footway.</p> <p>In addition, the proposed footway at the front of the site would require removal of the frontage hedge.</p> <p>The proposed footway fronting the site would need a pedestrian crossing to link with the existing footway on the other side of the road. This is not mentioned.</p> <p>Traffic Impacts. Already a busy road not suitable for additional traffic. Pedestrians use the road.</p> <p>It will be difficult to encourage non-car transport, as public transport in the area is poor, and the roads are not safe to cycle.</p> <p>The number of dwellings seems too much for the area, especially if it is to be a single row. The type of dwelling is not specified.</p> <p>Disappointed WBC have progressed this site without getting local community feedback.</p> |

Residents have identified a need for a burial ground, which has not been progressed. A burial ground should be included to be transferred to the Parish Council.

The requirement for a burial ground is confirmed in the Sustainability Appraisal and has been reiterated by the Parish Council in their response to the Reg. 18 consultation.

The RSA17 policy does not accommodate the need for a new burial ground at Chieveley and will remove the last suitable site for such use identified in the 2011 Chieveley Parish Plan.

The SFRA considered the use of the site as a burial ground in addition to residential.

The social need for a burial ground was not considered in the Sustainability Appraisal for the site, and therefore the SA statement that 'positive sustainability impacts are identified in relation to social sustainability' is not true.

Given that the burial ground was promoted by the developer and supported by the Parish Council, the Plan has not been positively prepared with the impact on the community not having been considered. A change of use application would now be required for the burial ground.

Not including a burial ground on the site means that residents will have to travel by car to other areas with burial grounds.

Alternative site plan with burial ground and other amendments put forward, along with changes to policy.

Chieveley did a housing needs survey which captured the local housing need and should be used to guide the housing mix for this site.

A specific footpath through the proposed site and diocese land to the recreational centre should be included to improve community infrastructure links and to other PRoWs – plan provided.

Request WBC give more weight to the Parish plan to support community goals through the LPR.

There are a range of assessments required before the site should be approved, but there is no faith that this will be done given that two restrictive covenants at Newbury Showground were ignored.

How is the proposed housing compatible with the proposed burial ground on the site? The burial ground would require parking to be provided.

A public path from the proposed development to the recreation ground would be a major benefit to the increased population as a result of the development.

Natural England and the AONB unit confirm that 'the strong rural character of East Lane should be conserved with retention and reinforcement of the hedgerow if possible.'

Adequate hedging and tree planting should be provided. The existing hedge and verge on East Lane should be retained. The trees date back to at least the 1800s and should be protected.

The hedges are over 60 years old and are regarded as ancient hedges, therefore irreplaceable.

RSA17 is inconsistent with NPPF 73a) regarding planned investment in infrastructure, NPPF 84d) requiring planning policies to enable the development of community facilities, NPPF section 11 which seeks to make effective use of land, NPPF 119 which requires planning policies to safeguard and improve the environment and ensure safe and healthy living conditions, NPPF 176 which requires great weight to be given to conserving and enhancing landscape and scenic

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| | <p>beauty in the AONB, NPPF 180, as the proposal will destroy ancient hedgerow and cause significant harm to biodiversity, NPPF 195 as the development could harm the setting of three listed buildings (Old House, Tudor Cottage and Coombe House), and impact the setting of the Chieveley conservation area.</p> <p>No assessment of the impacts on heritage assets.</p> <p>An allocation of 15 units is not making effective use of land of a site that is 1ha+. The housing site needs to be reduced by allocation of the northern section as a burial ground.</p> <p>The density at 15dph is below an acceptable density contrary to NPPF 124b).</p> <p>Light pollution will affect the dark landscape of the countryside and disturb bats.</p> <p>Social housing should be located towards Hazeldene.</p> <p>Adjustments required to make the plan viable will destroy the character of East Lane and impact the nature of the existing settlement.</p> <p>Gradual creeping infill in Chieveley leading to a loss of almost all countryside views. East Lane is one of the last places with this view.</p> <p>Chieveley is losing its character as a downland village and becoming urban.</p> <p>The small advantage of a few extra houses cannot justify the losses incurred.</p> <p>The identified area is not appropriate for the proposed development and the proposal cannot be made viable.</p> <p>Alternatives for development in Chieveley need to be considered.</p> <p>Privacy will be compromised.</p> <p>Land sits higher than the lane and houses opposite.</p> <p>Unclear whether parking will be provided – it will not be acceptable to park on East Lane.</p> <p>Will increase existing flooding problems.</p> <p>Allocation is contrary to Landscape Character Assessment 2011 and it had previously been agreed not to proceed with development in this location.</p> <p>Loss of grade 2 agricultural land.</p> <p>Harm to AONB</p> <p>Construction activities will cause significant disruption to people and wildlife.</p> <p>TPO on the proposed site.</p> |
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Landowners, site promoters and developers:

| Consultee | Main issues |
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| Diocese of Oxford | <p>Notes the Parish Council's comments and in particular the reference to the need for a new burial ground.</p> <p>The Diocese would be happy to consider gifting some land to the Council for use as a burial ground [location, access and size to be determined], as part of the proposal to allocate part of the glebe land for housing development.</p> <p>Specifically support the provision of social rented housing.</p> |

Summary of issues raised:

- Local residents particular concerns about access arrangements, traffic impacts and the impact on the rural character of East Lane and the wider AONB
- Chieveley Parish Council support for a limit of 15 dwellings, links to PROW and affordable housing
- Support for the provision of a burial ground from the local community and the site promoter
- Historic England concern about the lack of a Conservation Area Appraisal (CAA) and general lack of heritage assessment - further assessment is required
- Environment Agency considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: RSA18 Pirbright Institute Site, Compton

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|------------------------|--|
| Compton Parish Council | <p>Plans which are complex and cross representational boundaries are inherently difficult to deliver and therefore ineffective.</p> <p>Paragraph 2 should be amended as follows: <i>The site, as shown on the indicative map, is to be comprehensively redeveloped delivering a residential led mixed-use scheme with a mix of employment floorspace, green infrastructure and community uses in accordance with the adopted SPD, <u>and, more recently, the adopted Compton Neighbourhood Development Plan (NDP) (adopted 2022).</u></i></p> <p>Point e should be amended as follows: <i>The existing access from the High Street will form the main access to the development with potential for a minor access from Churn Road. The rural character of Churn Road and Hockham Road will be retained and highway improvements should therefore be limited <u>on these two roads</u>;</i></p> <p>Point g – concerns that the distance is too far for to walk for Primary aged children and request removal of the final sentence.</p> |
| Environment Agency | <p>Under point k (i.e., the list of requirements to manage flood risk on site) we request adding the following: iii) 'detailed computer modelling of the river Pang which runs to the south of the site will be required to inform development proposals, including the latest Climate Change Allowances.'</p> <p>Compton STW is a high spiller, so this issue needs to be addressed before connecting more flows to the works. Additional flows will lead to an increased instance of storm overflows. Development will lead to a deterioration in Phosphorous so a new permit will be required to prevent this from happening. Mitigation of additional load will need to be secured before any development can proceed. This wastewater drainage constraints should be highlighted for this site and stated in the policy text.</p> |
| Historic England | <p>Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised.</p> <p>Support criterion j.</p> |

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| | Criterion n – welcome reference to Compton Conservation Area, but it is unclear what ‘it’ refers to. Advise that the wording is changed to ‘conserve and enhance’ rather than ‘take into account’. Encourage the preparation of a Conservation Area Appraisal as a priority. Suggested wording provided. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

- Compton Parish Council request for the adopted Compton Neighbourhood Development Plan to be take more into account. Specific wording proposed.
- Historic England encourages the preparation of a Conservation Area Appraisal as a matter of priority. Specific wording changes also proposed
- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.
- Request for some wording changes from the Environment Agency. Environment Agency also noted that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation which must be stated in the policy.
- Thames Water noted that upgrades would be required to the water supply network.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA19 Land west of Spring Meadows, Great Shefford**

Number of representations received: 9

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|--|
| Environment Agency | Noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy. |
| Historic England | Supports the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. Recommend liaison with Thames Water at earliest opportunity. |

General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | This allocation is incompatible with the Habitats Regulations (2017), as it would create an adverse impact on the River Lambourn SAC through the cumulative impact of sewage pollution. The site will require connection to the existing system, which is failing. This has been documented through the Lambourn Valley Flood Forum. The proposal to upgrade the East Shefford STW would not resolve the specific issue of groundwater infiltration. The adverse effects would occur even with the phasing considered in the draft policy. |

The policy should be reviewed through the HRA as the mitigation would not be sufficient and therefore the plan will fail the integrity tests of the Habitats Regulations. Therefore it will have to consider overriding public interests and alternatives, which it should also fail given the parameters of the allocation.

This policy has not had regard to significant local concerns regarding sewage infiltration.

The village is susceptible to flooding and altering the landform in this location will exacerbate the potential for future flash flooding for existing residents.

Relying on the developer's surface water strategy is not appropriate and the issue should be addressed before allocation.

Infiltration is not appropriate in areas of high groundwater.

The proposal does not adequately address landscape and visual impacts and the site is likely to have a significant effect on the AONB which should be addressed before allocation.

Further street lighting will impact on the dark sky designation.

Encouraging non-car modes of transport is not appropriate in a village with limited public transport options.

The existing housing estate has insufficient parking and this will be reduced further by provision of a new footway at the end of Spring Meadows.

The landowner has removed vegetation and a new site entrance has been added which may have adverse impacts on ecology.

No reference to safeguarding the sensitivities of the school boundary, including consideration of construction and new traffic on a narrow road along with school pick-ups and drop offs.

The plans for Great Shefford have not considered the impact on Spring Meadows fully. 15 houses is too many. The roads are too narrow, flooding is a major issue, the current housing flood risk has not been assessed, there will be too much pressure on the sewage works in East Shefford.

Access via a small, heavily congested residential road. Limited parking spaces for residents already and will be exacerbated.

The access has been known to be isolated due to flooding.

The proposed location is susceptible to run off, and will increase the flood risk of the area.

Privacy – the site is situated higher than surrounding properties and new houses will look into gardens and bedroom windows.

Great Shefford has fine and varied natural life.

Construction traffic will limit access for emergency services. Could another temporary access be looked into?

Object to the allocation, which should be removed.

Why is this site recommended for allocation where it wasn't before? Previous SA does not recommend allocation. No justification for why the reasoning has changed.

Risk of groundwater flooding due to high groundwater and groundwater runoff from surrounding hills.

Access is of concern as well as impact of traffic on unsuitable roads.

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| | <p>Landscape will be affected due to height on the skyline Unclear when proposed flood alleviation works for the village will be undertaken or what effect they will have.</p> |
| Spring Meadows Action Group | <p>The necessary footway for the access will add significant width to the existing road. It's not clear what the sentences: <i>'Measures will be included to improve accessibility by, and encourage use of non-car transport modes. These measures will be set out in a Travel Information Pack'</i> actually mean and whether the intention would be realistic in practice. Does not provide sufficient certainty the effective mitigation can be provided. There is an absence of goods, services and facilities in proximity to Spring Meadows and therefore a heavy reliance on cars, which makes the sustainability of the site questionable. Additional housing would exacerbate school traffic problems. Little to indicate if an initial landscape assessment has taken place to demonstrate the proposal would satisfactorily integrate into the surroundings. Not clear whether the site is large enough to deliver a biodiversity net gain. The sequential test is needed to identify if any housing could be located on Flood Zone 1 instead. Suggestion that there will be pressure on the local foul drainage system as a result of the allocation. Due to proximity to the site's presence in the nutrient neutrality catchment area for the River Lambourn SAC, the results of future HRA will be crucial to the scheme's acceptability and viability. Lies outside settlement boundary of Great Shefford and will be a catalyst for other land to be subsequently given over to housing to the detriment of the area's open character and visual amenity of current residents.</p> |
| Governing Board of Chaddleworth St Andrews and Shefford C of E Primary Schools | <p>Safeguarding - The south west boundary is immediately adjacent to the school playing fields, and so boundary treatment should be considered to ensure the safeguarding of children on the site. Vehicle access and pedestrian safety - Any development on the site will need to consider and mitigate the impact of the additional vehicle movements on Spring Meadows, particularly during school drop off and collection. Infrastructure funding - Any development on the site should provide a suitable contribution under CIL or Section 106 towards school infrastructure.</p> |

Landowners, site promoters and developers: None

Summary of issues raised:

- Concerns from local residents included the impact on existing infrastructure, particularly access arrangements, traffic and the school.
- Particular concerns about flood risk, impacts on the River Lambourn SAC and waste water infrastructure
- Impact on the landscape character of the area and the wider AONB
- School governors concerned about safeguarding, additional vehicle movements and appropriate CIL or s.106 contributions for school infrastructure.

- Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water no concerns identified. Proposed including reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required.
- Historic England supports the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA20 Land off Charlotte Close, Hermitage**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---|---|
| Hermitage Neighbourhood Plan Steering Group | Object to strategy and site allocations for hermitage. The proposed allocations to deliver 59 dwellings in Hermitage has increased from the previous Reg. 18 which had 45 dwellings. RSA20 and RSA21 now have planning permission for more dwellings than in the LPR, therefore the total dwellings proposed in Hermitage is now 76. No evidence to assess the cumulative impact of proposed dwellings in Hermitage. The strategy of limiting growth in the AONB has not been applied in Hermitage. |
| Environment Agency | Developments connecting to Chieveley STW may be problematic as it discharges into the River Lambourn SAC which is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy. |
| Historic England | Supports the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. |

General Consultation Bodies: None**Other Stakeholders:** None**Landowners, site promoters and developers:** None

Summary of issues raised:

- Hermitage NDP Group concerned about the quantum of development in the village and the lack of evidence to assess cumulative impacts
- Historic England supports the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised.
- Environment Agency considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: RSA21 Land to the south east of the Old Farmhouse, Hermitage

Number of representations received: 6

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---|--|
| Hermitage Neighbourhood Plan Steering Group | <p>Object to strategy and site allocations for hermitage.</p> <p>The proposed allocations to deliver 59 dwellings in Hermitage has increased from the previous Reg. 18 which had 45 dwellings.</p> <p>RSA20 and RSA21 now have planning permission for more dwellings than in the LPR, therefore the total dwellings proposed in Hermitage is now 76.</p> <p>No evidence to assess the cumulative impact of proposed dwellings in Hermitage.</p> <p>The strategy of limiting growth in the AONB has not been applied in Hermitage.</p> |
| Environment Agency | <p>Encourages the requirement for the development scheme to include opportunities to open up the culvert and contribute to biodiversity net gain. Developments connecting to Chieveley STW may be problematic as it discharges into the River Lambourn SAC which is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy.</p> |
| Historic England | <p>Supports the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised.</p> <p>Policy doesn't mention Barnaby Thatch (Grade II) to the North. This designated heritage asset should be taken into account to ensure proposals avoid or minimise harm on its significance. Suggest adding an additional criterion – wording provided.</p> |
| Thames Water | <p>No likely infrastructure concerns regarding water supply and wastewater infrastructure. Recommend liaison with Thames Water at earliest opportunity.</p> |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Pro Vision for T A Fisher & Sons Ltd. | Concerns regarding spatial strategy, housing requirement and housing delivery Support for continued allocation of this site doesn't reflect support regarding the LPR as a whole. |

Summary of issues raised:

- Hermitage NDP Group concerned about the quantum of development in the village and the lack of evidence to assess cumulative impacts
- Historic England concerned policy does not mention Barnaby Thatch (Grade II) to the North. Additional wording proposed, Supports the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised.
- Environment Agency considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns
- Site promoter supports continued allocation of site

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA22 Land adjacent Station Road, Hermitage**

Number of representations received: 6

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---|---|
| Hermitage Parish Council | Lack of parking provision for Holy Trinity Church - additional parking with pedestrian access should be provided to ease parking on surrounding streets (Marlstone Road and Lipscombe Close). A new cycle route from Marlston to Station Road should also be provided linking pedestrian access to the church to reduce cycle traffic on the B4009. Planting is required behind rear gardens off Lipscombe Close to reflect the general village ambiance and the proposed Neighbourhood Development Plan. |
| Hermitage Neighbourhood Plan Steering Group | Significant concerns that the HELAA has not been used to inform RSA22 regarding landscape sensitivity. The indicative plan supporting RSA22 does not reflect the Landscape sensitivity and capacity assessment 2022 and should be amended to be made consistent with this. RSA22 doesn't provide the necessary clarity to ensure compliance with NPPF 174 & 176. No evidence has been submitted by the site promoter to demonstrate that the site is viable based on an allocation of approximately 34 dwellings. If additional dwellings are needed for viability, the site should not come forward. |
| Environment Agency | Developments connecting to Chieveley STW may be problematic as it discharges into the River Lambourn SAC which is an area of nutrient neutrality meaning any additional loads from the STW would need to be offset elsewhere in the catchment. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to the occupation. Due to the constraints highlighted for this site, this must be stated in the policy. |
| Historic England | Notes the proposed criterion: "A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets." This statement does not fully align with the HELAA site assessment. Assessment should also consider the site's relationship with a nearby a Scheduled Monument (Grimsbury Castle) – a point that is not mentioned in the Sustainability Appraisal for the site. As a result, the wording of this requirement for heritage impact assessment will need to be amended, in discussion with the Council's heritage advisers. Suggests revised wording for consideration. Unclear on the rationale for not undertaking a DBA and if needed field evaluation on this site, given the ridge and furrow system |

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| | identified on the HER. To align with the NPPF, wording needs to be added on a requirement for archaeological assessment. |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. Recommend liaison with Thames Water at earliest opportunity. |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|--|
| Wey Planning for Mr F Baker and Mr P White | <p>In principle support for the allocation. However, the allocation is not an efficient use of land. Could see a development of 47 dwellings. The 34 dwellings would fall beneath the densities recommended in the West Berkshire Density Pattern Book.</p> <p>Error with map (Appendix 1 should be used).</p> <p>Ambiguities between criteria b and d and the indicative map. The parameters outlined in b and d are not defined on the indicative map and the land not included in the red line boundary. Therefore, uncertainly over application of policy in relation to map. How ensure outcomes? Changes – map must include disused track; land adjacent to the existing treed railway line; and the set back from Station Road.</p> <p>Do not agree that development should be contained as indicated or with the way the public open space and developable area are shown on the map.</p> <p>Set back from Station Road – to protect the character and setting of the mature roadside trees. This is described in the policy but not shown on the indicative map. The Council has had to discount part of the developable area, removing 0.43ha from the developable area and requires development to be set back 40m from the inner edge of Station Road, equating to loss of 8 dwellings. Believe this to be an error. Agree with a set back but not to the extent of 40m. Suggest dense tree-lined native species hedgerow along the inner edge of Station Road, with set back of 15m, a feature characteristic of the Landscape Character Area. If accepted the 15m should be indicated on the indicative map, reducing the developable area by 0.16ha, which reduces the development potential from 50 to 47 dwellings.</p> <p>Surface water flood risk has been raised as a risk, and the HELAA concludes that development on areas as risk should be avoided. The Council has adopted an ‘absolute avoidance’ approach to the flooding risk at site assessment/selection stage rather than in a sequential approach, thus discounting all of the land at surface water flood risk. A sequential approach should be applied, and then if necessary an exception test. Opportunities should be provided for improvements in green and other infrastructure to reduce the causes and impacts of flooding. Evidence has been provided to show how a sequential, risk based approach has been used to inform the alternative spatial arrangement</p> |

between public open space and the developable area. This shows infrastructure (roads, amenity space, rear gardens) within areas of low risk. Public open space within the medium and high risk areas. This leaves a developable area of 2.35ha, which results in a development potential of 47 dwellings at 20dph.

Do not consider the spatial arrangement between the public open space (POS) and the developable area shown on the indicative map to be an effective use of land. A Viewpoint Assessment has been provided to illustrate that the proposed indicative map (agent's evidence) can be delivered.

Development of the RSA20 site has the potential to create public views across the RSA22 site to Grimsbury Wood, though the approved plans show landscaping could infill gaps and compromise its enhancement of the AONB. Thus, do not consider it necessary to contain development on the RSA22 site.

The policy requires the development to be 'set adjacent to the rear gardens of Lipscomb Close to avoid an open edge to the rear gardens', though the maps shows the POS against gardens. Is the developable area is extended up to the northern boundary the spatial arrangement will be more effective in meeting the requirements of the policy.

Consideration of the central open space should be had at the plan making stage. Do agree that the open space could operate as a 'village green', acting as a focal point for the surrounding built form. However, of the view that could segregate the new housing from the rest of the settlement and is the opposite of what the POS should be achieving in wider place shaping terms. The agent's indicative map illustrates the arrangement of the POS and developable area, taking into account flood risk avoidance and management, and mitigation of nutrient pollution.

Highway access – agree that access can be provided off Station Road, though Highways raised concerns about the roundabout onto the B4009. Reliance on Station Road means that is limited flexibility to address highway capacity or safety concerns. Thus, should identify additional access options. The agent's indicative map illustrates access off the B4009 and off Lipscomb Close, which pass through the RSA21 site. There is a right of access for RSA22 land across RSA21. Access is therefore available from Station Road. Access is available to Lipscomb Close as within the site owner's land. The access for RSA21 onto Lipscomb Close is not required, but the principle is accepted with the Council agreeing it was suitable for the RSA21 site.

Walking and cycling links – A link to the proposed footway/cycleway on RSA20 cannot be delivered because the land required is not owned or controlled by the local highway authority or the RSA22 owners. It would be possible to provide a link from the site to the existing pedestrian/cycle link running parallel to the adopted section of Station Road. The policy should be amended accordingly. In terms of the links to the former railway line the development of the site represents a significant opportunity to deliver a critical section of the route. It is a far superior option to the one being considered by the Council which involves an on road section along Marston Road and Lipscomb Close. The Policy does not make provision for this, and should be amended to include all land required to deliver the link, plus a 'walk and cycle link' along the disused track.

Proposed changes include replacing '34 dwellings' with '47 dwellings' in criterion a). Criterion b) amended to include either 'Newbury Road' or 'Lipscomb Close' after 'Station Road' to account for impact of the development on the roundabout junction. Criterion b) delete the words 'to the allocations RSA20 and RSA21' and replace with 'to Station

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| | <p>Road and the RSA21 allocation' to allow for walking and cycling links given that the link to RSA20 is not achievable. Amend the red line site boundary (the northern boundary) to reflect the availability of land. The south eastern boundary of the red line site boundary to include all of the land to which the parameters of the Policy RSA22 b in relation to the Hermitage to Newbury off road path, and land which is required to meet the provisions of Policy RSA22 d)iii). The indicative map to change to comply with the parameters of Policy RSA22, namely inclusion of two additional access symbols; repositioning the 'walk and cycle link' symbol; inclusion of new walk and cycle link to indicative the link via the disused track; change to the location and extent of the central open space; inclusion of a new 'landscape buffer' symbol to indicate the additional planting of the south eastern boundary and the set back from Station Road.</p> |
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Summary of issues raised:

- Heritage Parish Council is concerned about the impacts on Church parking and also that that cycleways and pedestrian links should be provided
- Hermitage NDP concerned about the lack of evidence of viability– should not be brought forward if more houses required
- Additional concerns about landscape impacts and the indicative plan not reflecting the LSA 2022
- Hermitage NDP concerned about the lack of evidence of viability– should not be brought forward if more houses required
- Historic England requires a Heritage Impact Assessment due to the presence of non-designated heritage assets and the nearby Scheduled Monument (Grimsbury Castle) and for the development to be informed by a desk-based archaeological assessment followed by field evaluation if necessary
- Environment Agency considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns
- In principle support from the site promoter but various amendments proposed to account for making the best use of land, the sequential approach to development, on site design and relationships with adjoining land and other site allocations, highway access, walking/cycle links, reopening the disused railway, and land ownership considerations.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA23 Land adjoining The Haven, Kintbury**

Number of representations received: 6

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | This site would require a Flood Risk Assessment which should be included in the list of requirements for assessing and developing the site. Kintbury STW is a high spilling site, so actions to address this are required. Development will lead to a deterioration in Phosphorous so a new and tighter permit will be required to prevent this from happening. Mitigation of additional load will need to be secured before any development can proceed. Due to the constraints highlighted for this site, this must be stated in the policy text. |
| Thames Water | No likely infrastructure concerns regarding water supply and wastewater infrastructure. |

General Consultation Bodies:

| Consultee | Main issues |
|--|---|
| Campaign to Protect Rural England (CPRE) | Will cause overcrowding in a village area of AONB. Road network unable to accommodate the growth. Significantly damaging to the countryside. Unsuitable due to poor infrastructure. Unnecessary destruction of landscape and greenfields. |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | Should be looking for alternatives such as redeveloping vacant land. Not building on fields in the AONB. The access is on a narrow road on which cars park an only space for one lane of traffic, no room for construction traffic. This will be exacerbated and children play on the street. |

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| | <p>Dismiss objections from locals and making things worse for residents of Kintbury. Lots of wildlife including Newts. There are no other plans to improve the infrastructure or traffic in the area. Building work will affect local residents, especially those working from home. There will also be a long term detrimental effect on existing residents of the Haven, e.g. overlooking and reduced light levels. There are other alternative sites in the village with better access. Put the proposed houses somewhere else. The change from KIN3 to KIN6 is wrong for the following reasons: Access for construction traffic is through a residential area and the centre of Kintbury, which is not the case for KIN3. The site is adjacent to a sports ground and will suffer from noise and light pollution. There will be a loss of garages for access to the KIN6 site – not the case for KIN3. The KIN3 site can flexibly accommodate the necessary amount of housing, is close to main grid transmission and could include a solar array. Buses pass daily. Access is marginally better for surgery, train station and school.</p> |
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Landowners, site promoters and developers:

| Consultee | Main issues |
|--|---|
| Boyer Planning obo Sovereign Housing Association Ltd | Sovereign supports the conclusion that residential development would be <i>achievable</i> on the site within the emerging plan period - the site is also immediately <i>available</i> for development. Sovereign considers that, with sensitive design, the site could accommodate a higher number of new homes that would go towards meeting the district's identified housing needs. Sovereign recommends that the identified approximate capacity within proposed Policy RSA23: 'Land Adjoining The Haven, Kintbury' be revised to approximately 35 dwellings and policy to state at least 20 dwellings. Sovereign is committed to bringing forward development on the site in accordance with the recommendations of the LSA. |

Summary of issues raised:

- Concern from local residents and CPRE about the principle of development, landscape/visual impacts, access arrangements, impacts on traffic, existing infrastructure,
- Environment Agency requires an FRA as part of the policy requirements. Considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water had no concerns
- Site promoter support for allocation

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA24 New Stocks Farm, Paices Hill, Aldermaston**

Number of representations received: 3

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---------------------------|--|
| Wokingham Borough Council | WBC supports the allocation which will make a contribution towards identified need. |
| Environment Agency | There is a historic landfill next to the site which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. It is not clear to us that this site would connect to a STW as it is quite far from any Thames Water sewers. Therefore, any wastewater drainage proposal for this site must be clearly stated as well as all mitigation measures proposed to ensure wastewater disposal from the development will not have a negative impact on sensitive receptors. These should be secured before any development can proceed. |
| Thames Water | Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered is required. |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

- Support for allocation

- Thames Water and Environment Agency concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered, is required.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: RSA25 Long Copse Farm, Enborne**

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|---|
| Historic England | Unclear if the potential impact on the setting of Grade II listed 33 & 34 Church Lane has been considered. Suitable mitigation may be needed on the western edge of the site, informed by heritage assessment. Suggested wording provided. |
| Environment Agency | Point 'k' states <i>"No caravans will be permitted within Flood Zones 2 and 3 at the northern edge of the site"</i> . There is no Flood zone 2/3 within the site but can this be confirmed. It is not clear to us that this site would connect to a STW as it is quite far from any Thames Water sewers. Therefore, any wastewater drainage proposal for this site must be clearly stated as well as all mitigation measures proposed to ensure wastewater disposal from the development will not have a negative impact on sensitive receptors. These should be secured before any development can proceed. |
| Thames Water | Include reference to concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered, is required. |

General Consultation Bodies:

| Consultee | Main issues |
|------------------|--|
| Woodland Trust | Support policy requirement for protection of ancient woodland in line with the NPPF. |

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|-----------------------|------------------------|
| RPS for Zippos Circus | Support for the policy |

Summary of issues raised:

- Clarification of flood risk required from the Environment Agency
- Thames Water concerns regarding waste water/water supply network capacity and the need to liaise with Thames Water to determine whether a detailed drainage/water infrastructure strategy informing what infrastructure is required, where, when and how it will be delivered, is required.
- Some assessment of heritage impacts required by Historic England
- Woodland Trust supports protection of ancient woodland
- Support for policy from site promoter

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: ESA1 Land east of Colthrop Industrial Estate, Thatcham**

Number of representations received: 3

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|--|
| Historic England | Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. The phrasing implies that field evaluation will definitely be required – is this the case? |
| Environment Agency | Would not support any additional flows entering the Newbury STW, a known high spiller until significant work has been done to tackle the causes of the frequent spills. Adequate wastewater treatment infrastructure capacity resources must be available or provided to support all proposed development prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy text. |
| Thames Water | Development likely to require upgrades to the water supply and wastewater networks, including sewerage treatment infrastructure. |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

- Environment Agency notes that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Thames Water notes upgrades required to water supply and wastewater networks, including sewerage treatment infrastructure

- Request from Historic England for consistent language relating to archaeology across the site allocation policies and clarification of whether a field evaluation is required.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: ESA2 Land west of Ramsbury Road, Membury Industrial Estate**

Number of representations received: 12

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|--|
| Historic England | Support criterion g due to the presence of a nearby Scheduled Monument (former military airfield) and Grade II listed asset (Lyckwood Farm). |
| Environment Agency | Noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. |

General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | <i>Traffic/transport</i> Transport links to the site are unsustainable – no close bus links or safe pedestrian/cycle access. Roads are dangerous and lack of cycles lanes means that the impact on the traffic network is unacceptable. No significant bus routes. Cycling is dangerous. The Highways Officer has stated that travel plans are generally unsuccessful as a solution. Traffic assessments should use TRICS and applicants should not be able to use their own data. |

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| | <p>Conditions relating to traffic data should not be allowed to control traffic volumes on the local road network. Volume of traffic is impacting the structure of some older properties.</p> <p>There have been four serious accidents in the last three months on the B4000/Ermin Street. When the roads are closed local businesses are impacted and the rural road network is heavily affected. This is exacerbated when the M4 is diverted, as the B4000 is used as a diversion.</p> <p>Previous planning application - flawed transport assessment of the likely impact on traffic from this site. WBC highways have delivered no road mitigation plan.</p> <p><i>Landscape</i></p> <p>The fact that the site is in the AONB does not seem to have been considered in direct contradiction with DC32 i, ii and viii.</p> <p><i>Flooding</i></p> <p>Development should be informed by a flood risk assessment.</p> <p>Already flooding on 3rd party land as a result of development at Membury. A surface water management plan is required.</p> <p><i>Amenity</i></p> <p>Air pollution levels along B4000 are similar to the centre of Newbury.</p> <p>Increasing light pollution is devastating the local bat population.</p> <p>Noise pollution is increasing.</p> <p>Ancient woodland is impacted by industrial development</p> <p><i>Other</i></p> <p>Membury should have a flight safety zone and major incident plan due to the presence of two service areas with fuelling stations, fuel depot, light aircraft activity, chemical company (solvents), timber yard and grain drier.</p> <p><i>Process</i></p> <p>Given the growth in the area from various sites and allocations, it is no longer acceptable that there has been no Environmental Impact Assessment.</p> <p>Concerned no Environmental Impact Assessment has been carried out at Membury which has led to an intolerable increase in traffic. The whole area has been subject to piecemeal development with no oversight of all of the impacts.</p> <p>Industrial development in this location seems to go against the government's desire to protect these areas (AONB's) and in contradiction of DC35 (h).</p> <p>WBC planning decides what it wants to happen well in advance – LAM6 was included in the Stantec report several months before the planning committee approved the application. Why seek consultation for LAM-6 if it is a done deal.</p> <p>Local community groups and Local Nature Partnerships haven't been consulted regarding industrial development at Newbury.</p> <p>Economic arguments don't outweigh the environmental impacts.</p> |
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| | <p>ESA2 was not included in the original draft plan, but when a planning application was submitted it appeared ahead of that decision and some of the plan documentation seemed to hint that the application had already been approved. Would like to see an investigation into this.</p> <p>Unclear why the LPA continues to pursue this location for industrial development. It is not in line with the sustainability policies of the LPA nor the NPPF.</p> <p>Unhelpful when officers dismiss objections regarding negative impacts on local amenity as the area is already impacted. No evidence or justification for the development of further sites in this location, especially of this size.</p> <p>The location cannot sustain this development.</p> <p>A masterplan for Membury with EIA and surface water management plan is required before further development can go ahead.</p> |
| Woodlanders Protection Group | <p>No effects of policy on SA objectives are measured.</p> <p>Council's own officers have stated that the development is not sustainable.</p> <p>Objective 2a (SA) - will never be met at this site as workers cannot access the site by walking or cycling and have to use private cars and the surrounding roads can no longer be used for walking, cycling or horse riding.</p> <p>The Council have allowed the applicant to suppress traffic generation figures against best practice and they can never be monitored or regulation – this is possibly illegal.</p> <p>Objective 4a/b (SA) - Membury area has limited opportunities to improve safety and reduce accidents and no viable public transport.</p> <p>Objective 5a/b (SA) - Site size and traffic generation mean it cannot preserve or enhance biodiversity or the landscape</p> <p>Objective 10 a/c (SA) – site will offer little economic benefit to the area as employees live outside of West Berkshire.</p> <p>SA conclusion that the site will have an overall neutral impact on sustainability is not correct. No sustainable travel options.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|--|
| Pegasus Group for Walker Logistics (Holdings) Ltd. | <p>The inclusion of this site is fully supported. However, the extent of the boundary has been reduced from that assessed in the HELAA and identified as deliverable, and confirmed by planning policy to be allocated in the Reg. 18 version of the plan under EMP5. A reduction from 27,600m² to 10,381m²; the area covered by the runway has been omitted. This approach is not supported.</p> <p>Critical that the boundary of the site allocation is extended as it would help WBC meet the identified need for industrial floorspace.</p> <p>No further comment, no further planning application envisaged to be required.</p> |

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| | Crucial that AONB designation does not constrain development that would result in significant benefits, as recognised in 19/02979/OUTMAJ. The originally promoted site should be allocated, an indicative scheme is included, as well as landscape impact justification and economic report. |
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Summary of issues raised:

- Concern expressed from many local residents including traffic impacts, air, light and noise pollution, the unsustainability of the site, and the impacts on the rural character of the area.
- Historic England support for approach to nearby heritage assets
- Thames Water noted that upgrades would be required to the water supply network.
- Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Site promoter support for allocation, but request original size be reinstated.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: ESA3 Land to the south of Trinity Grain, Membury Industrial Estate

Number of representations received: 10

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|--------------------|--|
| Historic England | Support criterion g – minor typo (a A) |
| Environment Agency | Noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy. |
| Thames Water | Development likely to require upgrades to the water supply network. No infrastructure concerns currently envisaged regarding wastewater. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | <i>Traffic</i> No significant bus routes/public transport. Cycling is dangerous. Local roads unsuitable. The Highways Officer has stated that travel plans are generally unsuccessful as a solution. Traffic assessments should use TRICS and applicants should not be able to use their own data. Conditions relating to traffic data should not be allowed to control traffic volumes on the local road network. |

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| | <p>There have been four serious accidents in the last three months on the B4000/Ermin Street. When the roads are closed local businesses are impacted and the rural road network is heavily affected. This is exacerbated when the M4 is diverted, as the B4000 is used as a diversion.</p> <p>Volume of traffic is impacting the structure of some older properties.</p> <p>Appalled by the push to extend the Membury site despite lack of transport infrastructure and irreparable damage to the AONB.</p> <p>No sustainable travel plans which is concerning given the sites' rural nature.</p> <p>Road is too small for 2 HGVs to pass</p> <p>Proposals have no travel plans to facilitate sustainable travel.</p> <p>Further development will only increase traffic problems and could lead to fatalities.</p> <p><i>Water/Flooding</i></p> <p>Water runoff will pollute the chalk streams and aquifers.</p> <p>Already flooding on 3rd party land as a result of development at Membury. A surface Water management plan is required.</p> <p>Increased footprint has caused flooding, exacerbated by lack of permeable membranes.</p> <p><i>Landscape/biodiversity</i></p> <p>Proposals will impact rural character of the area.</p> <p>Negative impact on night skies and wildlife habitats.</p> <p>Proposal may impact ancient woodland.</p> <p>Effects on landscape inconsistent with location in the AONB.</p> <p>Ancient woodland is impacted by industrial development</p> <p>Rural character of the area is being destroyed by WBC.</p> <p>Lack of environmental assessments in the AONB.</p> <p>Increasing light pollution is devastating the local bat population.</p> <p><i>Amenity</i></p> <p>Air pollution levels along B4000 are similar to the centre of Newbury.</p> <p>Increased noise/air pollution & disruption- impacting health and wellbeing of residents.</p> <p><i>Process</i></p> <p>Unclear why the LPA continues to pursue this location for industrial development. It is not in line with the sustainability policies of the LPA nor the NPPF.</p> <p>No environmental impact assessment, flood risk assessment or cumulative impact assessments.</p> <p>The location cannot sustain this development.</p> <p>The proposed development at Membury is unsustainable if local resident's needs are given consideration, plus risk of flooding, pollution (including light pollution) and carbon footprint.</p> <p><i>Infrastructure</i></p> |
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| | <p>Unhelpful when officers dismiss objections regarding negative impacts on local amenity as the area is already impacted. No evidence or justification for the development of further sites in this location, especially of this size. Infrastructure cannot cope with power demands of industrial estate – power outages. Local infrastructure will gradually crumble until it will be unfit for purpose. <i>Climate Change</i> Development will increase carbon footprint of the area - against WBC's own policy. WBC carbon and pollution policies haven't been adhered to at Membury. <i>Other</i> Membury should have a flight safety zone and major incident plan due to the presence of two service areas with fuelling stations, fuel depot, light aircraft activity, chemical company (solvents), timber yard and grain drier. A masterplan for Membury with EIA and surface water management plan is required before further development can go ahead. Spread of industrial into agricultural land - will impact negatively on food production and rural economy. The M4 was shut down at least twice due to chemical releases from Rutpen. Economic arguments do not outweigh the environmental arguments and effects on residents in this location. Santec report indicates need for new industrial development in Newbury and Reading but not here. Object to continued expansion of industry at Membury. Walker development should not have been allowed to proceed. Stop further development in Membury.</p> |
| Woodlanders Protection Group | <p>Site constitutes a 'green lung' in the middle of the Membury Industrial Area. Uses unsuitable country lanes for access No public transport to the site Land adjacent to the site is susceptible to flooding Site is adjacent to rural homes HGVs are a risk to the local population. Economy of West Berkshire is so strong that it is unlikely there would be any added economic gain from this site.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--------------------|---|
| Trinity Grain Ltd. | <p>Sole ownership, no availability issues pertaining to the site. Support allocation of the site for employment use. The policy should allow for flexibility in meeting the identified employment land requirements. Restricting uses to B2 and E(g)(iii) and excluding B8 uses is unsound. It is unclear why B8 use is excluded.</p> |

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| | <p>The exclusion of B8 uses would be contrary to the provisions in DM32, which would not preclude the site from being redeveloped for B8 purposes in future.</p> <p>Criterion a – should not refer to floorspace as it precludes the option for open storage.</p> <p>Criterion b – the access point on the plan is shown through the existing Trinity Grain processing site and is not possible for operational reasons – access and safety issues. Access from Ramsbury road should be taken from the southern portion of the site along the internal access road to enter just below the silos.</p> <p>Criterion e (i) & (ii) – allowing for B8 use on the site doesn't preclude adherence to the Landscape Assessment, and could be developed to sit below the height of the adjacent silo towers and tree canopy.</p> <p>Criterion g – contest the need for this requirement as the site doesn't contain any heritage assets and the closest is 650m away. Whilst archaeological potential is unlikely, a desk based assessment should suffice.</p> |
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Summary of issues raised:

- Concern expressed from many local residents including traffic impacts, air, light and noise pollution, the unsustainability of the site, and the impacts on the rural character of the area.
- Historic England support for approach to nearby heritage assets
- Thames Water noted that upgrades would be required to the water supply network.
- Environment Agency noted that the River Lambourn SAC is an area of nutrient neutrality meaning any additional loads from the East Shefford STW would need to be offset elsewhere in the catchment. East Shefford is an exceptionally high spilling site, mostly due to Ground Water infiltration. The Environment Agency would not support additional flows to this site until work has been done to reduce the frequency of storm overflows. It considers that adequate wastewater treatment infrastructure capacity resources must be available or provided prior to occupation. Due to the constraints highlighted for this site, this must be stated in the policy.
- Site promoter support for allocation but considers that B8 use should not be excluded, the access should be amended, and contest the need for a Heritage Impact Assessment

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: ESA4 Beenham Landfill, Pips Way, Beenham**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|------------------------|--|
| Beenham Parish Council | No objection in principle. Noise should be restricted as it carries to Beenham village Landscape buffer should be provided to shield views from higher land Lighting should be minimised |
| Environment Agency | This site is located on top of a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We assume wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Thames Water | Development likely to require upgrades to the water supply and wastewater networks, including sewerage treatment infrastructure. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------------|---|
| RPS for Atomic Weapons Establishment | Whilst AWE do not object in principle to the allocations, they reserve the right to consider and make representations upon any detailed proposal in due course under the terms of Policy SP4. |

Other Stakeholders: None**Landowners, site promoters and developers:** None

Summary of issues raised:

- Beenham Parish Council concerns about lighting, noise and potential landscape impacts
- Environment Agency no concerns
- AWE no in principle concerns
- Thames Water noted that upgrades will be required to water supply and wastewater networks, including sewerage treatment infrastructure.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: ESA5 Northway Porsche, Grange Lane, Beenham**

Number of representations received: 6

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|------------------------|--|
| Beenham Parish Council | No objection in principle Access road is in poor condition and dangerous, a footpath should be provided. Access road ownership is uncertain, which should be clarified. Criterion d(v) should be deleted. Permitted development should be restricted to activities that are not noisy due to proximity of housing. |
| Environment Agency | This site is located on top of a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We assume wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Historic England | Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Thames Water | Development likely to require upgrades to the water supply and wastewater networks, including sewerage treatment infrastructure. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------------|---|
| RPS for Atomic Weapons Establishment | Whilst AWE do not object in principle to the allocations, they reserve the right to consider and make representations upon any detailed proposal in due course under the terms of Policy SP4. |

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|-------------------|---|
| Dijksman Planning | <p>Support the allocation of this additional site; the parameters are broadly acceptable.</p> <p>Any off-site highway works must be directly related in scope to the additional demand arising from the allocation and payment is only necessary if that additional demand cannot be accommodated within the existing capacity of the network.</p> <p>The determining issue should not be what already exists on the site but what visual impact any new buildings may have to the landscape and rural character in the broader landscape context, which is covered by requirement e.</p> |

Summary of issues raised:

- Beenham Parish Council concerned about noise and request criterion (d) is removed. Also request the access should be upgraded and the ownership clarified
- Environment Agency no concerns
- AWE no in principle concerns
- Thames Water noted that upgrades will be required to water supply and wastewater networks, including sewerage treatment infrastructure.
- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.
- Site promoter support for allocation, request developer contributions are limited to only what is necessary and cannot be delivered on site.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: ESA6 Land adjacent to Padworth IWMF, Padworth Lane, Padworth

Number of representations received: 7

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|------------------------|--|
| Beenham Parish Council | No objection in principle The site is near to housing. Noisy activities should not be permitted. The site is visible from high ground in Beenham Village. Tall landscape buffers should be provided. |
| Historic England | Support the requirement for desk-based archaeological assessment and if required, field evaluation. However the language used across the site allocation policies is inconsistent and could be standardised. |
| Environment Agency | This site is located on top of a historic landfill which means that any significant foundations or ground excavations at the site may lead to creation of a pathway for pollutants within the landfill to reach groundwater. We assume wastewater will be discharged at the Reading STW. No concerns provided Thames Water are confident any additional flows will not lead to deterioration of phosphate classification. Reading STW is within DWF capacity and not a frequent spiller. The policy notes should include a requirement for developers to liaise with Thames Water to discuss wastewater drainage for the site. |
| Thames Water | Development likely to require upgrades to the water supply and wastewater networks, including sewerage treatment infrastructure. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------------|---|
| RPS for Atomic Weapons Establishment | Whilst AWE do not object in principle to the allocations, they reserve the right to consider and make representations upon any detailed proposal in due course under the terms of Policy SP4. |
| Canal & River Trust | Pleased to see a traffic impact assessment required to include the Padworth swing bridge, LVIA and ecological assessments. These assessment should consider the adjacent canal and need to protect the water environment. |

Other Stakeholders:

| Consultee | Main issues |
|-----------------|--|
| Cllr Alan Macro | The site contains the remnants of equipment and machinery to load trains with oil products and tranship between road and rail. It is therefore extremely likely to be contaminated. Point (h) should be reworded to require an intrusive contaminated land assessment and remediation measures. |

Landowners, site promoters and developers: None

Summary of issues raised:

- Canal & River Trust request consideration of impacts on adjacent canal
- Potential for land contamination and an intrusive investigation and assessment should be undertaken including remediation measures.
- Beenham Parish Council concerned about noise and landscape buffer
- Environment Agency no concerns
- AWE no in principle concerns
- Thames Water noted that upgrades will be required to water supply and wastewater networks, including sewerage treatment infrastructure.
- Request for consistent language relating to archaeological assessment across the site allocation policies from Historic England.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM1 Residential development in the countryside

Number of representations received: 14

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---------------------------------|--|
| Chieveley Parish Council | <p>Object to apparent change to a presumption in favour of residential development outside of settlement boundaries, even if exceptionally. Wording should revert to previous draft.</p> <p>Object to weakening of the criteria for exceptions.</p> <p>Policy is not in accordance with NPPF 80 which is worded as a presumption against rather than presumption in favour. A presumption in favour of development for exception sites will have a negligible effect on the rural economy, but a significant cumulative effect on the landscape and AONB.</p> <p>The final sentence of the policy regarding cumulative effects will not prevent cumulative impacts as they will result from the policy and not be capable of assessment on individual proposals.</p> <p>If there was concern about the previous policy being overly restrictive to smaller villages, one of the exceptions to the policy could have been reframed, without having to rewrite the whole policy.</p> <p>The general exception for development to be appropriately designed and located lacks clarity.</p> <p>Exceptions (b) to (g) should continue to relate specifically to other relevant DM policies.</p> <p>Criterion b – sites for Gypsies, Travellers and travelling Showpeople should be allocated in accordance with other policies in the plan, and not subject to an exception. Exceptions for these sites should continue to be tied to other policies.</p> |
| Hermitage Parish Council | <p>Supports the policy as it will reduce settlement creep between communities and associated harm to the countryside.</p> |
| Purley on Thames Parish Council | <p>We would ask the planning authority to take into account these observations from the Purley on Thames Village Action Plan:</p> <p>DM1: Inform organisations responsible for making planning decisions of new village plan.</p> |

General Consultation Bodies:

| Consultee | Main issues |
|------------------------|---|
| Liberal Democrat Group | Due to the number of constraints on development resulting in a serious shortage of available suitable land in settlements, also given the major changes in living, travel and working habits occurring in rural areas with the roll-out of the internet and EV charging, there seems to be a reduced need to control development in the countryside. We feel there is no justification for a policy that prevents almost all housing development in the countryside if it is deemed to cause any harm in the relationship between settlements and countryside. We wish to only prevent significant harm and to give great weight to development that can be shown to be self-sufficient and not lead to significantly more need to travel and is exceptionally well designed, |

Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ local residents | <p>It is accepted that there should be control over isolated homes in the countryside. However, this policy effectively creates an embargo on small development within the countryside unless it is within a 'settlement boundary'. This excludes the opportunity for windfall sites adjacent to a settlement boundary.</p> <p>'Settlement boundary' is not a term commonly used by other local authorities and The NPPF at paragraph 80 does state that planning policies and decisions should avoid the development of isolated homes in the countryside, however NPPF paragraphs 22, 69(c) 72(b), 85 & 120 do not use the term 'settlement boundary', instead using the term 'settlement'.</p> <p>There is increasing pressure to develop and therefore the policy is too restrictive, fails to support the local building industry, and is contrary to the spirit of the NPPF.</p> <p>The Council has simply drawn a new settlement boundary around new major development built by national builders for which it will gain CIL, s.106 and Council Tax, again to the detriment of local industry.</p> <p>Planners tick boxes when deciding an application, with no recourse other than to go to an appeal.</p> <p>Local fibre broadband is often out of reach of small groups of homes even close to settlement boundaries due to the perceived viability by the providers; additional homes in these locations may make these areas viable for broadband.</p> <p>Policy DM1 should be rewritten to be less onerous on small developers/builders who can develop and enhance communities that already exist – alternative policy supplied.</p> <p>Nothing to encourage the extension of small bungalows into large dwellings which can be advantageous for large families or those who care for elderly relatives.</p> |
| Councillor Alan Macro | Supports policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|---|
| Bell Cornwell LLP for Hathor Property Limited | This policy should be amended to support delivery of infill development or self or custom build plots in edge of settlement locations adjacent to settlement boundaries where the development would have an appropriate relationship to the existing form and pattern of development. |
| Bluestone Planning for Mr & Mrs T Gallagher | Policy does not consider sites which are outside of, but closely related to settlements with settlement boundaries. Sites at higher order settlements located close to the settlement boundary will be far more sustainable than sites in more remote settlements. However, they will be treated as sites in the countryside despite being more sustainable than the sites excepted by policy DM1 and will often have none of the characteristics of 'open countryside' sites. |
| Fisher German LLP for Mr Musgrave and Mr Begley | Broad support but consider exceptions should also apply to market housing, supported by appropriate evidence on housing need. |
| Lucy White Planning for Bradfield College | <p>Policy DM1 does not allow new residential development outside of settlement boundaries for staff at existing educational institutions. This should be allowed where a need can be demonstrated, including the benefits from this being on, or in close proximity to the campus.</p> <p>The exception for housing to accommodate rural workers could be expanded to cover this.</p> <p>Criteria h only allows limited infill in settlements with no settlement boundary, and does not expressly allow infill proposals where a settlement boundary exists, such as Bradfield.</p> <p>Therefore there is no policy support for additional staff housing outside of the Bradfield settlement boundary, despite staff being accommodated outside of the settlement boundary, which would be suitable for infill and replacement dwellings.</p> <p>The Plan should be flexible enough to accommodate needs not anticipated in the Plan, in line with NPPF 82d. Therefore an additional criteria for staff housing for residential institutions should be incorporated into DM1.</p> |
| Planview Planning for Leibreich Associates | <p>Criterion h is permissive, but contrary to the restrictive settlement boundary approach in SP3.</p> <p>The provision of limited infill should extend to sites beyond settlement boundaries where the development would be sustainable.</p> <p>The policies are more permissive of speculative development in unsustainable locations than development adjoining settlement boundaries.</p> <p>The policies preclude growth in sustainable/accessible locations where there is no identified harm.</p> <p>The redevelopment of previously developed land where the site is well related to settlement boundaries should be supported.</p> <p>Settlement boundaries are blunt tools, and DM1 should provide sufficient flexibility to allow sustainable development outside of settlements.</p> |

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| Savills UK for the Englefield Estate | DM1 has been amended to state that ‘exceptionally, new residential development outside of adopted settlement boundaries will be permitted’ - recommended that ‘exceptionally’ is deleted. Our view that a settlement boundary should be identified at Englefield to facilitate sustainable development within the village. It is also recommended, with regard to the criteria set out at LPR Appendix 3, that adopted settlement boundaries are drawn to allow flexibility for appropriate limited future expansion and to thereby support ‘opportunities for villages to grow and thrive’ (NPPF paragraph 79). Recommended that part e of policy is amended to include reference to ‘re-use’ of redundant or disused buildings, in line with NPPF paragraph 80, in order to clarify that existing buildings can be brought back into use as well as being converted to a different use. |
| Tim North & Associates Ltd. | Specialist housing for older people should be a category that may exceptionally be provided for in this policy subject to quantitative and qualitative need being demonstrated. This would be a recognition of current planning decisions where specialist housing is being allowed in countryside locations in view of the pressing need. |

Summary of issues raised:

Some support for policy

Objections to weakening of the criteria for exceptions.

- ‘*appropriately designed and located*’ lacks clarity.
- Criterion b – sites for Gypsies, Travellers and travelling Showpeople should be allocated and not subject to an exception

Objections to restrictive nature of policy

- Fails to support the local building industry,
- Given major changes in living, travel and working habits there seems to be a reduced need to control development in the countryside.
- Sites close to higher order settlements will be far more sustainable than those close to more remote settlements.
- Suggestions that policy should allow development outside settlement boundaries for residential development for staff at existing educational institutions, for specialist housing for older people and to support delivery of infill development or self or custom build plots in edge of settlement locations.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM2 Separation of settlements around Newbury & Thatcham**

Number of representations received: 10

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|-----------------------|---|
| Speen Parish Council | Support requirement for separation of settlements. Area west of the A34 in Speen should be included in this policy. |
| Thatcham Town Council | Welcomes and supports Policy DM2. However, Council believes that the omission of 'land between Thatcham and Bucklebury' from this Policy is inconsistent with the evidence. |
| Theale Parish Council | A settlement boundary needs to be maintained between Theale and surrounding villages in order to maintain their individual character. |

General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | <p>Surprising how late the consideration of green gaps has been.</p> <p>Concerns around Appropriate Countryside Designations study and whether any elected representatives have seen it – not advised to Newbury Town Council nor come before a NTC planning committee – not sound.</p> <p>Should include a gap between Newbury and Ashmore Green and Newbury and Cold Ash.</p> <p>This will allow developers to build right up to the AONB, and if that is the intention this should be stated in the spatial strategy.</p> <p>Consideration of green gaps north of Thatcham have not been consistently applied north of Newbury and the sprawl north of Newbury will stretch for miles.</p> <p>Incorrect conclusion that parcel 9 does not provide an essential gap between settlements.</p> |

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| | <p>Preservation of productive land has not been considered within the assessment. Welcome and support Policy DM2. However, the omission of 'land between Thatcham and Bucklebury' from this Policy is inconsistent with the evidence. The results of the Appropriate Countryside Designation Study, with regard to 'Land between Thatcham and Bucklebury', were pre-determined by the 'considerations' for the study which specified that high level masterplanning already produced can contribute to the work.</p> |
| Cllr Alan Macro | <p>The policy should require gaps between other settlements, such as:</p> <ul style="list-style-type: none"> • Between Theale and Calcot/ Tilehurst • Between Pangbourne and Purley-on-Thames |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Gladman Developments | <p>Concerned with the gap policy designations:</p> <ul style="list-style-type: none"> • identification of settlement gaps will act to constrain the ability of sustainable development opportunities from coming forward - considered that Policy SP8 provides adequate protection for the character setting of settlements. • it is an aspiration of Newbury Town Council to improve the highway network, identifying a preferred solution for a new road from the western Sandford development running east and south of Garden Close Lane before joining the A343 at Wash Water. • There is no justification provided for the area of and proposed to form the settlement gap titled, 'Land between Newbury and Enborne Row/Wash Water'. Considered that the evidence base justifying the designation is not robust. |
| RPS for Mr Steve Hamilton | <p>Client's land lies within the proposed "gap" between Newbury and Thatcham and object because it seeks to sterilise and prevent development on land that is currently already protected by its countryside status in the adopted local plan. There is no need to add a further layer of constraint. West Berkshire has not designated green gaps or wedges in the past and designation needs to be justified.</p> <p>Para.9.11 contradicts itself. Gaps are like green belts in that they have a planning function, but the quality of the landscape and other environmental factors are not a consideration.</p> <p>Not agreed that that "no more land than necessary" has been proposed for designation as gap. With regard to the area of gap to the south of the A4, most of the proposed gap is former gravel workings, which now consist of lakes and wet woodland. The area is protected by environmental designation, such as SSSIs and Nature Reserves. There is no need for a further layer of constraint and there is certainly no need for such a large area to be designated.</p> <p>Consider that policy DM2 is unnecessary and flawed. The policy should be deleted from the draft local plan</p> |
| Carter Jonas for the Trustees of the Frank | <p>Surprising that, in light of the hugely constrained nature of the district, the Council is now seeking to further prevent the possibility for sustainable development around the most sustainable settlements through the introduction of green</p> |

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| Wallis Estate | <p>wedges. Considered contrary to NPPF paragraph 60 and unnecessary as the existing policies in the Local Plan seek to avoid development outside settlement boundaries in the open countryside.</p> <p>Further development in the AONB could be avoided by the deletion of draft Policy DM2 and a thorough consideration of edge of settlement sites at Newbury and Thatcham should be undertaken. Considered that the SA is flawed in relation to Policy DM2.</p> <p>Whilst there is some sympathy with the conceived essential gap between Newbury and Thatcham preventing coalescence, sustainable development east of Waller Drive enables the creation of a permanent green gap in the form of a country park, which would be retained, with certainty, in perpetuity.</p> <p>Policy should be deleted but also suggests possible amendments.</p> |
| Nexus Planning for Croudace Homes | <p>Support exclusion of Henwick park from the proposed 'green gaps', although there is some overlap with the extensive country park. This is not seen as a conflict with the policy as there will be no built development in this area.</p> <p>No specific reasons why land at Henwick park cannot be allocated.</p> |

Summary of issues raised:

Some support and suggestions for designation of additional gaps from parish councils and individuals.

Developers/site promoters had a number of objections:

- Already sufficient protection from countryside status and no need to add a further layer of constraint.
- Evidence base justifying the designation is not robust.
- Para.9.11 contradicts itself - the quality of the landscape and other environmental factors are not a consideration.
- Not agreed that that “no more land than necessary” has been proposed for designation as gap – some areas proposed are already protected by environmental designation.
- SA/SEA of DM2 is flawed

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM3 Health and wellbeing

Number of representations received: 6

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---------------------------------|--|
| Theale Parish Council | <p>All the development proposed in Theale would have an unacceptable impact on the health and wellbeing, particularly air quality, noise pollution, increased traffic and congestion, further strain on medical facilities, loss of open green space, loss of biodiversity and more.</p> <p>10.2 – states that leisure facilities are very good, yet Theale has none, nor any direct public transport links to any, which should be stated.</p> <p>Theale has very little open space and it is extremely important that this is protected.</p> <p>The plan needs to state how emissions will be reduced, particularly as they are already high from the M4 and A4. More development will impact increase this problem.</p> |
| Purley on Thames Parish Council | <p>We would ask the planning authority to take into account these observations from the Purley on Thames Village Action Plan:</p> <p>DM3: Represent the suggestions from local people to land owners and organisations, which manage the river and Thames Path</p> |

General Consultation Bodies:

| Consultee | Main issues |
|-----------------------|--|
| NHS Property Services | <p>Support policy in principle. There is a well-established connection between the planning system and public health, and planning has an important role in the provision not only of improved health infrastructure but in addressing wider health determinants.</p> <p>Identifying and addressing the health requirements of developments can deliver healthy, safe and inclusive communities. Therefore support policies requiring active consideration of health concerns.</p> |

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--|
| Keith Hoddinott | Sport and exercise should be prominent in the school curriculum. Developers may contrive the amount of space required for sports facilities, and facilities are already limited A school recently collapsed due to defective concrete – has there been any investigation into whether other schools are likely to be affected? |
| Councillor Alan Macro | Supports policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Bell Cornwell LLP for Hathor Property Limited | We would also suggest including express reference to the health and wellbeing benefits of residents of rural villages being able to stay within their local community as their needs change. Development which delivers small scale housing to meet local needs should be supported. |

Summary of issues raised:

- General support for the policy
- Concern that developers may be able to contrive (reduce) the amount of space required for sports facilities
- Suggestion to include reference to health and wellbeing benefits of being able to stay within local community.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM4 Building sustainable homes and businesses

Number of representations received: 20

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---------------------------|--|
| Burghfield Parish Council | No mention of micro-generation e.g. solar panels on houses and micro wind turbines and their use where appropriate to assist with reducing the district's carbon footprint. |
| Theale Parish Council | 10.15 - Should be stated how national targets will be met. The Plan needs to address these issues - how electricity and gas usage will be cut and fuel poverty will be addressed. 10.34 – these measures should be explored in the current local plan. |
| Historic England | Further detail should be provided on what is a 'suitable' location for renewable energy development, including with reference to the historic environment. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------|--|
| Home Builders Federation | The approach will in effect require developers to bring forward energy efficiency standards in new homes that are beyond current building regulation but also those that would be introduced in the Future Homes Standard through the requirement to achieve a target for space heating that matches those required for a Passivhaus. Consider that the most effective way of achieving these improvements is through nationally applied standards and not through a variety of different approaches adopted in local plans. Council's approach inconsistent with that being put forward in policy. Evident that the Government's intention is to use building regulations as the main focus for change on this matter and this is further reinforced by paragraph 154b of the NPPF. The Council must amend this policy to remove reference to achieving standards beyond those required by Building Regulations. If the Council are to continue with this approach, we would recommend that more clarity on flexibility is included in the policy where this would result in a development becoming unviable. |

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| | The policy requires a payment to be made where net zero cannot be achieved. The HBF considers such policies to be inconsistent with national policy which makes no reference to offsetting of residual carbon emissions from both unregulated and regulated energy. Costs will be high in short term and viability should be tested against these costs not on future efficiencies. Reference to unregulated energy use in this policy should be deleted as it is not in the control of the developer. |
| Newbury Society | Some policies don't seem achievable without government intervention – e.g. carbon neutral housing will require changes to the building regulations. |

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | <p>Policy is almost certainly impossible to achieve commensurate with Listed Building Law. These properties should be excluded from the requirement, or the plan will block development or refurbishment of these premises.</p> <p>The use of micro generation is permitted but no context for this to include alterations to listed buildings or within their curtilages has been provided for.</p> <p>Point 4 directly contradicts the supporting text which states that carbon offsetting schemes must be used, not just cash. No consideration has been given to the capacity of carbon offsetting schemes and if they are exhausted then they will act as a block on development that needs to rely on offsetting.</p> <p>Don't believe there has been any discussion with Historic England or Listed Property Owners Club.</p> <p>The uplift figure of 63% under the first bullet point of Section 1 appears to be entirely arbitrary and will be very difficult to deliver without the addition of renewable electricity generation equipment onto a dwelling. It becomes increasingly difficult to design out energy requirements from UK housing and this will seriously affect the financial viability of house building. Section 2 states a BREEAM requirement. 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. 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.</p> |
| Cllr Alan Macro | <p>The policy covers building standards, renewable energy developments and carbon offsetting. These are three very different subjects and should be covered by different policies. The subject matter is supported.</p> <p>SA/SEA appraisal for policy DM4 is incorrectly labelled DM3. The overall effect should be assessed as positive.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Ridgepoint Homes | The requirement to achieve a 63% reduction in carbon emissions compared to the Building Regulations Part L2021 is considered extremely onerous compared with the current Building Regulations which utilise 2013 as the baseline and |

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| | <p>would result in developments having to reach virtually net zero which is not a government requirement until 2050. Suggest the policy is amended to reflect current Buildings Regulations requirements.</p> <p>The 15kWh/m²/year space heat demand target is unachievable and would likely require different methods of construction that could impact development viability. Suggest this is deleted.</p> <p>In relation to carbon offsetting, suggest that the value per kg of CO₂ is established within the draft policy or SPD to provide certainty of costs for developers.</p> |
| Barton Willmore, now Stantec for Copas Brothers (Farms) Ltd. | <p>This policy does not have the required flexibility to be able to allow different scales and types of development to be delivered and will impact on viability.</p> <p>Estimations of building costs required to achieve the policy have increased between assessments, and can be expected to continue to increase as better data becomes available.</p> <p>This will make unallocated sites much harder to deliver on the assumption that schemes will be delivered just because there is demand and viability to drive their progression.</p> <p>Additional employment land should be allocated to ensure a consistent and deliverable supply should any forthcoming sites encounter difficulties.</p> <p>Not all proposals will be physically or financially able to achieve BREEAM excellent. While this is acknowledged in the supporting text ('where appropriate'), this needs to be included in the policy.</p> <p>There are several references to the 'energy hierarchy' therefore a description or illustration of this should be provided.</p> <p>Regarding construction standards for new non-residential development, the nationally recognised standards to calculate a typical baseline should be provided.</p> <p>Regarding point 4 (Carbon offsetting), any cash contribution sought by West Berkshire through a planning obligation must satisfy the CIL regulations. Currently, it is unclear how any funds would be used. Proposed changes to policy wording provided.</p> |
| Thakeham Homes | <p>Operational carbon emissions are usually defined through regulated energy consumption, as unregulated energy consumption is impossible to accurately predict, and its verification post-occupation is not something the Council are going to be able to administer, and neither is the housebuilding industry ready to conduct this monitoring.</p> <p>Supports the Future Homes Standard approach to Net Zero Ready. Considers that the Council should not take into consideration unregulated energy when defining carbon emissions.</p> <p>The higher level of energy standards sought by draft Policy DM4 go beyond national policy and the Government's future intentions.</p> |
| Barton Willmore, now Stantec for Yattendon Estate | <p>It is not clear if the word 'businesses' refers only to those businesses under Class C (such as hotels) or if the Policy covers other commercial uses under Classes B, E and F. Recommend that the Council separates this Policy into two different Policies, covering Class C uses and non-residential development respectively.</p> <p>Although we do not object to the carbon-offsetting payment it is unclear how any funds raised would be calculated and used. We suggest that the supporting text includes information setting out how the Council will calculate the price for</p> |

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| | <p>offsetting carbon. The price set should not put an unreasonable burden on development and must enable schemes to remain viable.</p> <p>Clarity should be provided in terms of where the cash in-lieu payment will be used. In our view, it would be beneficial to allow flexibility such that offsetting contributions can be used by the same business / reinvested in business operations.</p> |
| <p>Pegasus Group for Donnington New Homes</p> | <p>Requires that, ahead of formal adoption of Future Homes Standard, development achieves a 63% reduction in carbon emissions by on-site measures, as compared to Part L Building Regulations. It goes on to require targets for space heat demand targets. The proposed levels expected by this policy are completely excessively and overly onerous. Technical evidence and assumptions are unclear and unclear whether the policy has been ‘tested’ in terms of how viable, or not, the requirements are for implementation. Policy needs to be rigorously tested by industry experts with the technical expertise to impartially advise on the implications of the various measures/targets proposed.</p> |
| <p>Turley for Donnington New Homes</p> | <p>We support the re-wording of the policy from the Regulation 18 stage to remove the reference to Home Quality Mark standards.</p> |
| <p>White Peak Planning Ltd for Bloor Homes Ltd</p> | <p>Bloor Homes supports the Council’s commitment to delivery of net zero housing however in its current form we do have significant concerns that the Policy is unsound and could lead to a reduction in the delivery of much needed private and affordable dwellings.</p> <p>Detailed comments and suggested amendments to policy and supporting text set out in representation.</p> <p>We believe that draft Policy DM4 is attempting to introduce an interim requirement above Building Regulations up until 2025 followed by implementation of the FHS 2025. The Government’s 2019 FHS consultation response set out the rationale for implementing a staged approach to reducing emissions, largely in response to capacity and skills in the market to deliver the required changes. Amendments should be made to the policy to align with the Government’s net zero strategy.</p> <p>With respect to the cost of draft Policy DM4, the Whole Plan Viability Assessment 2022 tests a cost uplift of 5% for Policy DM4 which is significantly lower than the figure of 11% considered in the 2021 assessment and no evidence is presented to justify the use of this lower figure. Considers there to be a number of potentially significant omissions from the viability assessment that justifies Policy DM4 and therefore recommends that the Council reviews the assessment to ensure it is sound</p> <p>Unregulated energy - While Bloor Homes supports the delivery of net zero homes it is considered this should be restricted to regulated energy only. The unregulated energy consumption ultimately the function of the residents’ use of the building.</p> <p>Question the assessment of risk for number of policy approaches in the DM4 evidence base. Believe further evidence needs to be gathered to consider the viability implications of both Approach 3 and 4.</p> <p>Clarity sought on specification of low carbon and renewable energy technologies.</p> <p>Carbon offsetting - broadly supports the addition of a mechanism to offset residual carbon emissions provided that the scope and cost of such a policy has been tested - concerns that the policy does not clearly state the cost of carbon used</p> |

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| | and that this has not clearly been included within the viability assessment . The Policy needs to include reference to delivering the required carbon offset within a reasonable timeframe. |
| Pro Vision for Feltham Properties | Concerned local authorities don't have the expertise to draft deliverable standards, which could lead to housing delivery issues. 1. A. – advice from energy specialists is that this requirement is impractical as most dwellings will not pass Part L without the addition of PV, making use of heat pumps more prominent. However, these are not always suitable for smaller units where electric/OV makes more sense. Concerned the policy misunderstands Part L and lacks justification for the 63% figure. |
| Planning Bureau for McCarthy & Stone | Having mandatory net zero standards from adoption goes beyond Government targets, and the policy should be 'stepped' in line with Government targets. Policy should be deleted as net zero carbon development is to be dealt with via the building regulations. |
| Pro Vision for TA Fisher & Sons Ltd. | 'Net zero' should be defined, as there are differing interpretations |

Summary of issues raised:

General support for objectives of policy with some suggestions from parish councils and individuals;

- Should state how national targets for reduction of CO2 emissions will be met
- Should consider measures to increase retro-fitting energy efficiency measures for existing housing stock.
- No mention of micro-generation
- Building standards, renewable energy developments and carbon offsetting should be covered by different policies
- Listed buildings should be excluded from requirement

The development industry were primarily concerned with the requirements to go beyond current building regulations and those that would be introduced in the Future Homes Standard, and how this may affect viability and housing delivery. Representations contained a number of detailed points regarding the practicality and implementation of the policy.

Particular objections/ suggestions include:

- Technical evidence, assumptions and evidence of viability testing are unclear
- Reference to unregulated energy use in this policy should be deleted as it is not in the control of the developer.
- Not all proposals will be physically or financially able to achieve BREEAM excellent, which needs to be acknowledged in policy
- Suggest that the supporting text includes information setting out how the Council will calculate the price for offsetting carbon and where payment will be used.

- Question the assessment of risk for number of policy approaches in the DM4 evidence base.
- Request the policy be removed, and net zero dealt with via the building regulations.
- Request for 'net zero' to be defined

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM5 Environmental nuisance and pollution control**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
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| Environment Agency | Text should be included in the policy to ensure that ground and surface waters are protected from pollution as required by NPPF section 15. Suggested wording to prevent discharge to groundwater aquifers through land affected by contamination No information in the evidence base with regards to groundwater protection needs, particularly in relation to previously contaminated land. |

General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
|-----------------------|--|
| Simon Pike | Supports the inclusion of obtrusive light in Policy DM5 Should consider providing guidance on which environmental zone for exterior lighting control is applicable to different parts of West Berkshire, either in this Policy or an SPD. |
| Councillor Alan Macro | Supports policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Ridgepoint Homes | The requirements regarding tranquillity, light spill and glare will result in additional technical work for planning applications which would add unnecessary costs and delays impacting the viability of development. |

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| | The requirement to preserve tranquillity of sites is reflective of the requirements in the AONB as set out in SP2. This is considered to be extremely onerous for development proposals outside of this protected landscape. Suggest points e and f are deleted. |
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Summary of issues raised:

- Limited representations were made on this proposed policy, with developer concern over requirements regarding tranquillity, light spill and glare impacting viability.
- Environment Agency requests to strengthen the policy in relation to water pollution

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM6 Water quality

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | We stated in our response at the regulation 18 consultation that a standalone water course policy should be included in this local plan. This is to provide more protection for the water environment in West Berkshire as required by NPPF Section 15. This is particularly important given the nationally and internationally protected sites that includes the River Kennet Site of Special Scientific Interest (SSSI), the River Lambourn SSSI and Special Area of Conservation (SAC) and a number of SSSI and SAC wetland habitats within the Kennet floodplain. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|-----------------|
| Councillor Alan Macro | Supports policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|-------------------------------|---|
| Deloitte for Green Park (GPR) | GPR recognises the importance of protecting the quality and biodiversity of watercourses. However, a blanket buffer zone of 10 metres is restrictive to sustainable development and does not allow flexibility to promote high quality development that can enhance the biodiversity and quality of watercourses. In the supporting text there is a reference to the Strategic Flood Risk Assessment (2021) which states that no development should be within 10 metres from the top of a main river, but then recommends that this is applied to all watercourses. Recommends that additional flexibility is |

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| | incorporated for smaller water bodies, especially where it can be demonstrated that flood risk can be adequately mitigated |
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Summary of issues raised:

- Recommendation from the Environment Agency for a standalone water course policy to be included in the LPR
- Concern regarding buffer zone for watercourses and recommended extra flexibility for smaller water bodies.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM7 Water resources and wastewater

Number of representations received: 9

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|--|---|
| Thatcham Town Council | The detailed assessment of Policy DM7 in Appendix 6 of the SA/SEA makes no mention of consideration of going further than the 110l/p/d water efficiency target, Therefore, the recommendation of JBA Consulting in the Water Cycle Study, that WBC may want to consider going further than the 110l/p/d water efficiency target particularly in larger strategic developments, has not been properly considered. West Berkshire Council should undertake a proper environmental assessment of the target for water usage efficiency. |
| Hungerford 2036 Neighbourhood Development Plan Group | Concur with Hungerford Town and Manor that it is not appropriate to apply a safeguarding provision to land that is owned by the Town and Manor of Hungerford charity without prior consultation and despite the fact that there are more suitable sites to upgrade the Hungerford WWTW. <i>Other comments already summarised as for Town and Manor of Hungerford Charity.</i> |
| Environment Agency | We asked previously for the Chieveley, Hungerford and Newbury WWTW to be mentioned/included in the plan. The draft plan states that, these need to be upgraded as stated in section 10.71: However further details such as the timeline and approach to ensure these improvements meet the needs of upcoming developments have not been provided. Developments proposed across the plan period should not outpace required wastewater infrastructure provision or improvements. Developments should not go ahead when there is no wastewater drainage infrastructure in place or when the existing infrastructure will still be exceeding their permit limit. Suggested amended wording supplied |
| Thames Water | DM7 in relation to water efficiency is supported in principle, but needs to be strengthened to ensure the water efficiency standard of 110 litres per person per day is met. EA has designated the Thames Water region to be an area of “serious water stress”. Consider that the New Local Plan should include a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods. Representation includes recommended amendments to DM7 including reference |

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| | <p>in policy that development within the vicinity of existing sewage treatment works should be assessed in relation to impact on amenity.</p> <p>Supporting paragraph 10.70 indicates that developers will be expected to fund network upgrades – this requires clarification. The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water’s asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> |
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General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------------|--|
| Home Builders Federation | The Council should not be asking development to aim for water neutrality, which will require reductions in water use in other buildings across the District. This is not in the gift of the development industry to deliver. Suggest delete reference and move opening paragraph of policy to supporting text as more an objective than a policy against which an application will be determined. |
| Town and Manor of Hungerford Charity | Not justified to safeguard land owned by the Hungerford Town and Manor Charity without prior consultation and where there are more suitable alternatives for future upgrades to the Hungerford WWTW. The proposed WWTW safeguarded area has ancient commoners’ rights and has one of the only carparks on Hungerford Common; it is utilised by Thames Water and Network Rail. The parcel to the East of the WWTW is also owned by the Hungerford Town and Manor Charity and would be more suitable for any future expansion. Request that reference to the existing safeguarded site is replaced with this site. |
| Liberal Democrat Group | The policy admits that West Berkshire District is part of a “severely water stressed area” but accepts the Building Regulations reduced standard supply rate for new developments of 110l/p/d maximum as adequate. We are aware that other parts of the south and south east have adopted 100L/p/d as the standard, with 80L/p/d for strategic sites. Failure to explore this would seem to show this policy is unsound in every sense. |

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|-----------------|
| Councillor Alan Macro | Supports policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|------------------|--|
| Ridgepoint Homes | The additional costs of grey water recycling could become unviable for certain developments. Suggest grey water recycling is restricted to ‘where feasible’. |

Summary of issues raised:

General support for principles of policy with some recommendations for suggested amended wording

Main issues raised –

- Failure to explore going further than the 110l/p/d water efficiency target, particularly in larger strategic developments.
- Policy needs to be strengthened to ensure water efficiency standards met.
- Request from Town and Manor of Hungerford Charity for alternative area for safeguarding at Hungerford Sewage Treatment Works.
- On provision of infrastructure to serve development, Thames Water considers that a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure be included. Environment Agency seeks further details on timeline and approach to ensure improvements.
- Development industry raise concerns regarding aim for water neutrality and additional costs of grey water recycling.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM8 Air quality**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | SP16 is in conflict with DM8 e) by changing the sustainable access route at Warren Road to a main access route. Vulnerable users including two schools and two churches will now be subject to increased air pollution, particularly PM2.5. Warren Road should remain as a green link. Air Quality improvement plan is a critical omission. Traffic surveys are six years old and out of date. Unchecked growth in traffic pollution will derail the vision of West Berks as a place people want to live, work and invest in. |
| Councillor Alan Macro | Supports policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|------------------|--|
| Ridgepoint Homes | Proposed thresholds for an air quality assessment cannot reasonably be said to result in significant changes in vehicle-related emissions as to justify the requirement for an air quality assessment based on parking provision only. Also not in line with government guidance. Suggest point (ii) is deleted. |

Summary of issues raised:

- General concern from public on impact of increasing development on air quality
- Question requirement for an air quality assessment based on parking provision (point (iii))

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM9 Conservation Areas**

Number of representations received: 8

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|----------------------|---|
| Speen Parish Council | Supports the policy. |
| Historic England | Main concern is lack of Conservation Area Appraisals, ideally with Management Plans. Suggests moving 10.81 to the text supporting SP9 and adding relevant commitments to SP9. |

General Consultation Bodies:

| Consultee | Main issues |
|-------------------------------|--|
| West Berkshire Heritage Forum | The value of each Conservation Area is directly proportional to the extent that a Conservation Area Appraisal has been prepared and approved. Little to no progress has been made in this regard. |
| Newbury Society | Policy is misleading and flawed, consists of empty words and is not sound. There has been little progress on Conservation Area Appraisals (CAAs) despite assurances. WBC is not following national policy on the creation or review of CAAs. The status of the Conservation Area Working Group is not clear and it hasn't met since 2020. DM9 needs to be rewritten to be clear and achievable. Heritage should be seen as one element of sustainability. |
| Liberal Democrat Group | The Council has not used any kind of systematic, evidence based or reasonable approach to preparing CAAs. Without a CAA it is very difficult for any LPA to “define what is special about a particular Conservation Area” and therefore to justify a claim that a particular development harms its character. Until evidence is produced that some of the larger CAs will have CAAs made within a period of, say, five years, there can be no confidence that Policy DM9 will carry sufficient weight in decision making for developments within or affecting the setting of a CA. |

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--------------------|
| Councillor Alan Macro | Support for policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|------------------------|---|
| Lochailort Newbury Ltd | <p>There should be a general cross reference to Policy SP9 to ensure that the public benefits approach in Conservation Areas is carried through.</p> <p>Bullet point g should be deleted as use of term substantial harm is confusing.</p> <p>Proposed additional bullet point added to section on demolition of positive contributors to be consistent with NPPF.</p> <p>Para. 10.82 is incorrect. The loss of a building that does not make a positive contribution to the CA cannot be considered harmful to it.</p> |

Summary of issues raised:

- Main concern expressed by Historic England, West Berkshire Heritage Forum and the Newbury Society is in relation to Conservation Area Appraisals and the limited progress being made on their preparation. Historic England considers this to be a strategic issue which should be dealt with under SP9
- Some other suggested wording amendments

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM10 Listed Buildings

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|----------------------|--|
| Historic England | Support the policy – minor typo – an ‘is’ is not needed. 10.100 – formatting issue, paragraph is more indented than others. 10.92 – welcome reference to taking a whole building approach. |
| Speen Parish Council | Supports the policy |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--------------------|
| Councillor Alan Macro | Support for policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|------------------------|--|
| Lochailort Newbury Ltd | Suggested amended wording regarding contribution of setting. To say “will not be permitted “does not allow a balanced judgement, as required by the NPPF and SP9. The reference to public benefits is superfluous as SP9 and the NPPF already set this out, and here it introduces yet more tests. In direct conflict with SP9 and the NPPF. |

Summary of issues raised:

- General support for policy
- Concern from site promoter that “will not be permitted” does not allow a balanced judgement and that the reference to public benefits in conflict with SP9 and the NPPF
- Some minor wording amendments proposed.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM11 Non-designated Heritage Assets**

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|----------------------|--------------------|
| Historic England | Support for policy |
| Speen Parish Council | Support for policy |

General Consultation Bodies:

| Consultee | Main issues |
|-------------------------------|---|
| West Berkshire Heritage Forum | The support of Council to extend local listing under the agreement with the Heritage Forum is welcomed. This could be assisted by directing parish councils towards the forum when proposed developments may impact on heritage assets. |

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--------------------|
| Councillor Alan Macro | Support for policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|--|
| Barton Willmore, now Stantec for Yattendon Estate | Consider that this policy does not meet the test of soundness because it is not consistent with national policy (para 200 of NPPF), insofar as it affords the same level of protection to both designated and non-designated heritage assets. Suggested amendments to policy supplied. |

Summary of issues raised:

- General support for policy including from Historic England
- Concern from landowner that affording the same level of protection to both designated and non-designated heritage assets is inconsistent with national policy

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM12 Registered Parks and Gardens**

Number of representations received: 6

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------------|--|
| Holybrook Parish Council | The Linear Park is not on the 'Register of Historic Parks and Gardens of Special Historic Interest in England'. However, the Park has been Awarded Green Flag status for more than 11 consecutive years and it should, therefore, be listed by the Council as a protected local asset. |
| Historic England | Support for policy |

General Consultation Bodies:

| Consultee | Main issues |
|-------------------------------|--|
| West Berkshire Heritage Forum | The Berkshire Gardens Trust has a larger role than the LPR suggests. It has carried out a survey of historic parks in central and eastern Berkshire and wishes to extend this to West Berkshire. |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Councillor Alan Macro | Support for policy |
| Various individuals/ local residents | Maintenance of the landscape will depend on owners having the income and desire to do so. For larger landscapes this is straightforward, but for smaller, private landscapes e.g. land attached to housing estates, diversified ownership is not likely to produce desired results. A common policy for maintenance of all publically used landscapes is needed. |

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| | Relates only to historic sites. Correlation of DM policies is not obvious. Non-delivery of promises of old policy CS18 never monitored through the AMR. |
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Landowners, site promoters and developers: None

Summary of issues raised:

- Support form Historic England

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM13 Registered Battlefields**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|------------------|--------------------|
| Historic England | Support for policy |

General Consultation Bodies:

| Consultee | Main issues |
|-------------------------------|--|
| West Berkshire Heritage Forum | The 1644 second battle of Newbury was as historically significant as the 1643 first battle and the site is therefore as deserving as being designated a Registered Battlefield. Unfortunately, the more extensive development of the second battle site has prevented this from happening. The Heritage Forum would be happy to work with WBC to at least locally list the site of the second battle, in collaboration with the Battlefields Trust. This would require legal support which only the Council has available. |
| Battlefields Trust | Welcome specific policy for registered and unregistered battlefields at Newbury Policy could be strengthened by adding wording requiring any assessment to be undertaken using best practice methodology by an archaeologist experienced in battlefield archaeology- suggested wording supplied. Request to be consulted on every planning application on the Newbury Battlefields. 10.1114 – reference to DM12 should be DM11 Please consider defining the area of the second Newbury Battlefield through a local listing. Remain concerned about development impacts on the first battle of Newbury site – a proportionate article 4 direction could be considered. |

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--------------------|
| Councillor Alan Macro | Support for policy |

Landowners, site promoters and developers: None

Summary of issues raised:

- Support from Historic England.
- Suggested policy strengthening from the Battlefields Trust, along with consideration of designating the second battle of Newbury site, and restricting permitted development rights on the First Battle of Newbury site through an article 4 direction (DMPO).

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM14 Assets of Archaeological Importance**

Number of representations received: 2

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|------------------|--------------------|
| Historic England | Support for policy |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--------------------|
| Councillor Alan Macro | Support for policy |

Landowners, site promoters and developers: None

Summary of issues raised:

- Policy supported

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM15 Trees, woodland and hedgerows

Number of representations received: 11

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---------------------------------|--|
| Purley on Thames Parish Council | We would ask the planning authority to take into account these observations from the Purley on Thames Village Action Plan: Campaign to encourage homeowners to cut back overhanging foliage Review responsibilities for funding of hedge cutting along major roads |
| Theale Parish Council | 10.138 – there is already loss of tree canopy and this should be avoided at all costs. |

General Consultation Bodies:

| Consultee | Main issues |
|------------------|--|
| Woodland Trust | This policy is legally compliant as it recognises that ancient woodland and related habitats are irreplaceable in line with the NPPF. The policy represents a best practice approach to meeting the legal requirements for ancient woodland protection. Strongly welcome the policy and supporting text, which is sound. |

Other Stakeholders:

| Consultee | Main issues |
|------------------|--|
| Bio Cap | Biodiversity should be specifically referenced in the DM policies, given the government’s ambition to reverse the decline in biodiversity. |

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| Councillor Alan Macro | Support for Policy |
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Landowners, site promoters and developers:

| Consultee | Main issues |
|--|---|
| Ridgepoint Homes | Species selection should be determined by the location, character and purpose of the proposed locations, and in certain locations non-native species may be considered more appropriate. Suggest point c is deleted. |
| Pegasus Group for Donnington New Homes | Welcome the amendments as they provide the flexibility for trees which are of a lower quality to be replaced, at an appropriate location and scale, to maximise the development potential of allocated and other sites. |
| Turley for Donnington New Homes | Object to the wording of this policy as it is too restrictive in only allowing protected trees to be removed in “exceptional circumstances”. Suggested amendments supplied. |
| Pro Vision for TA Fisher & Sons Ltd. | It is not appropriate to conserve trees, woodlands and hedgerows in all instances and policy should be amended for clarity |
| Planview Planning for Leibreich Associates | The policy could be enhanced by giving weight to developments that provide enhancements to trees, woodland and hedgerows, which would better reflect the supporting text. Suggested wording provided. |
| Savills UK for Englefield Estate | General approach of Policies DM15 and DM16 (<i>should be DM16 and DM17</i>), to support First Homes and rural exception housing adjacent to settlement boundaries, is supported. |

Summary of issues raised:

- Support for policy particularly from the Woodland Trust
- Biodiversity should be specifically referenced
- Regarding species selection, non-native species may be considered more appropriate in some locations.
- Too restrictive in only allowing protected trees to be removed in “exceptional circumstances”.
- Not appropriate to conserve trees, woodlands and hedgerows in all instances
- Suggestion to give weight to developments that provide enhancements to trees, woodland and hedgerows

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM16 First Homes exception sites

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|-----------------------|--|
| Theale Parish Council | The plan should state that affordable homes should remain affordable, no extensions should be allowed which increase the value and make them non-affordable. 11.1 – the word rent needs to be reinstated as there are many people who cannot get a mortgage for a variety of reasons. |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|--------------------------------------|---|
| Abri Group (Housing Association) | Grant funding not available for delivery of First Homes, funding available as part of pilot scheme not rolled out further. Text in para 11.3 should remove reference to grant funding. |
| Savills UK obo the Englefield Estate | General approach of Policies DM15 and DM16 (<i>should be DM16 and DM17</i>), to support First Homes and rural exception housing adjacent to settlement boundaries, is supported. |

Summary of issues raised:

- Policy supported. Minor word changes proposed

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM17 Rural Exception housing**

Number of representations received: 2

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:** None**General Consultation Bodies:** None**Other Stakeholders:** None**Landowners, site promoters and developers:**

| Consultee | Main issues |
|--|--|
| Pro Vision for Rivar Ltd. | In principle support inclusion of the policy. Concerns that the requirement for all schemes to provide a local housing needs survey is onerous and will restrict the delivery of sites through this policy, particularly as the Council don't incentivise parishes to have an up to date housing needs survey. The lack of affordable housing in rural areas will determine who can live there, contrary to the aim of the plan to improve affordability. Policy should allow for greater flexibility to demonstrate local housing need. Suggested amendments to policy provided. |
| Armstrong Rigg Planning obo Manor Oak Homes | 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). This has also identified a shortage of 2-3 bedroom market housing. The LPR 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. 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. Suggested amendments to policy included in representation. |

Summary of issues raised:

- General support for policy from development industry
- Concerns that the requirement for all schemes to provide a local housing needs survey is onerous
- Consider that should be amended to allow for the delivery of market housing to meet a specific local need identified through a Housing Needs Survey

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM18 Self and custom build housing

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|--|
| Nexus Planning for Croudace Ltd. | Encouraged to see support in principle for self and custom build housing, given historic lack of permissions to meet demand. However, some self and custom house building should be allocated or be required as part of other developments to ensure need is met. |
| Bell Cornwell LLP obo Hathor Property Limited | Based on the latest Governmental data release (May 2022), West Berks Council granted planning permission for 29 serviced plots between 31 Oct 2020 and 30 Oct 2021. Data was not supplied to indicate the level of demand based on the number of people on your registers. This data should be transparent and published regularly. Policy should support delivery of self and custom build on small plots in a limited number of settlements. |
| TOWN obo landowners of Land East of Pincents Lane | Clear from the figures in AMR that demand for self- and custom-build plots far outstrips demand. Strategic sites should make an identified contribution to meet these needs. |
| Planview Planning for Leibreich Associates | Policy misses an opportunity to deliver enhancements to local character, landscape and biodiversity as well as sustainable design and construction. Suggested wording provided. |

Summary of issues raised:

- Suggestions from the development industry that strategic sites and small plots in a limited number of settlements should be supported.
- Request for self and custom build housing be allocated, or mandate that it should be delivered through other developments.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM19 Specialised housing**

Number of representations received: 11

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|-----------------------|--|
| Theale Parish Council | 11.20 in tracked changes version should be reinstated, as there is an identified need. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------|---|
| Home Builders Federation | Important that this policy sets out how many specialist homes for older people are required in West Berkshire and a commitment is made to monitoring supply against this level of need across the plan period. In addition, the HBF would also recommend that a presumption in favour of development be applied if the supply of land for such development falls below identified annual needs of 95 units per annum. By including the level of need in the policy rather than the supporting text greater weight will be given to this in decision making leading to more positive approach. |

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--------------------|
| Councillor Alan Macro | Support for policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|-----------------------------|---|
| Tim North & Associates Ltd. | The plan is not sound in its approach to specialist older persons accommodation – SP18, DM1, DM4 and particularly DM19. |

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|---|--|
| | <p>Ensuring future housing supply is met on the basis of ‘Lifetime Homes Standards’ will not in itself be sufficient to meet the accommodation requirements of various types of specialist older households.</p> <p>Material considerations affecting the specialist older persons accommodation have not been fully considered in the LPR. The UK population is ageing and the trend is expected to grow.</p> <p>NPPF 63 requires the LPA to consider the size, type and tenure of housing needed for older people.</p> <p>The evidence for the LPR indicates a need for 1,710 units but the only specialist older persons accommodation is an extra care scheme at Stonehams Farm, which doesn’t match historic completions.</p> <p>Further allocations should be made for specialist older persons housing, or flexible provision should be made in DM1. It is not considered that the market can be fully relied upon to meet the outstanding need.</p> <p>A more flexible approach is needed, and emphasis on ensuring requirements are met.</p> <p>Requirement to look at need for specialist housing for older people based on an appropriate standard room with separate wash facilities as communal facilities are no longer appropriate post Covid-19.</p> |
| Walsingham Planning for Muller Property Group | <p>Welcome the built-in support for specialist forms of housing including care homes and that “support” is the starting planning policy position.</p> <p>It is in our view too prescriptive to restrict from the outset specialist housing only where a need can be demonstrated. “Need” will change over time, it will be subject to short-term and longer term trends and Policy DM19 as currently worded will be unable to respond to changing needs and market conditions. It is important that the number of units needed in the District should be seen as a minimum and not a cap. Recommend that flexibility is built into the Policy and allowance made for speculative or “windfall” development.</p> |
| Pro Vision for Rivar Ltd. | <p>Policy is not sufficiently positive to ensure the need for housing for the elderly is addressed.</p> <p>Policy adds unnecessary requirement to demonstrate need when the evidence base already demonstrates a significant need for specialist housing for the elderly.</p> <p>Policy should positively encourage this type of accommodation in areas with good transport links and local facilities and services, as in South Oxfordshire Local Plan.</p> <p>Policy SP1 provides a presumption against development outside of settlement boundaries, but it is doubtful whether the need for specialist housing can be met from these areas or via limited site allocations. The policy should provide clarification that where schemes meet the criteria they will be supported within and outside of settlement boundaries.</p> <p>Alternative policy wording provided.</p> |
| Planning Issues for Churchill Retirement Living | <p>Suitable delivery of specialist housing for the elderly will be a substantial undertaking unless action is taken by the Council urgently.</p> <p>Criterion a is unnecessary as the need for these forms of accommodation is self-evident in the Housing Needs Assessment and justification for the policy itself.</p> |
| White Peak Planning Ltd obo Bloor Homes Ltd | <p>The wording is not justified or effective. Proposed amendment to last paragraph of policy to add <u>subject to evidence of need and site specific viability</u></p> |

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| Pro Vision for T A Fisher & Sons Ltd | It is inappropriate to have to prove locally identified need to support delivery of individual schemes given the evidence base and already identified need for specialist Housing. |
| The Planning Bureau for McCarthy Stone | The policy should be amended to emphasise the importance of older person's housing. Older person's housing produces economic, social and environmental benefits. Suggested policy wording provided. |
| Nexus Planning for Croudace Homes | No specific allocations are proposed to meet these needs in West Berkshire. Instead there is an expectation that the two strategic housing allocations at Sandford Park and North East Thatcham will provide specialist accommodation as an integral part of their mix. In Croudace's view, this is grossly insufficient to meet the scale of needs set out within the evidence base. One approach would be to allocate specific sites, or parts of sites, to meet specialist housing. Another would be to introduce a specific mechanism in planning policy which supports the provision of specialist housing outside of settlement boundaries, subject to certain criteria e.g. South Northamptonshire Local Plan Policies LH6 and LH7 |

Summary of issues raised:

- General support for principles of policy
- Important that this policy sets out the need in the policy and commitment made to monitoring
- Recommend that a presumption in favour of development be applied if the supply falls below identified annual needs
- Criterion (a) is unnecessary as the need is self-evident in the Housing Needs Assessment
- Policy should positively encourage this type of accommodation in areas with good transport links and local facilities
- Suggestion that where schemes meet the criteria they will be supported within and outside of settlement boundaries
- Need for allocation of specific sites, rather than rely on strategic allocations.
- Seeking specialist housing on strategic sites should be subject to evidence of need and site specific viability.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM20 Gypsies, Travellers and Travelling Showpeople

Number of representations received: 9

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|----------------------------------|---|
| Aldermaston Parish Council | 11.31 - The text should refer to RSA24 rather than RSA32. Wording is also misleading as the growth at Old Stocks Farm has already been approved. If further expansion is proposed, Aldermaston Parish Council would probably oppose this due to proximity to AWE. |
| Basingstoke and Deane Council | Concerns about the shortfall in provision in gypsy and traveller pitch provisions, and is keen to continue to engage in suitable discussions under the Duty to Cooperate. |
| Bracknell Forest Borough Council | <p>On the basis of the GTAA (2019), as set out in Table 7 of the LPR, the identified need for gypsies is 30 pitches (based on cultural need) and 20 (based on PPTS need) between 2021/22 and 2037/38 (which includes a shortfall between 2021/22 to 2025/26). Table 8 indicates there is a travelling show people requirement of 24 plots, and a need for four transit pitches. However, it is noted from the Plan (para. 11.35) that the longer term need for Gypsy and Traveller pitches and the need for transit sites will be addressed in a separate Development Plan Document, with evidence due to be prepared between 2023-2025, and anticipated adoption in 2027. It is assumed that the GTAA will be updated to reflect a new plan period, and should be seeking to meet cultural needs following the 2022 'Lisa Smith v SSLUHC [2022] EWHC' judgement.</p> <p>In relation to transit provision, the LPR states that collaborative working will be undertaken with neighbouring authorities (para. 11.26). However, BFC is of the view that transit provision is not a duty to co-operate matter. This follows legal advice in respect of the Criminal Justice and Public Order Act 1994. Under the latter, the police are unable to exercise their powers under sections 62A-E concerning the removal of a trespasser to an alternative site, if there is no suitable pitch or site within a Borough. This means that the matter must be addressed within each Council and does not therefore have cross boundary implications.</p> <p>Prior to submission of the BFLP, BFC undertook Duty to Co-operate discussions with adjoining LPAs in January 2021 (these being the authorities most likely to be able to meet local needs) asking for assistance from adjoining authorities in helping to meet its Gypsy and Traveller pitch needs. No LPA was in a position to assist. The Council proposed to release</p> |

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| | a site from the Green Belt on Land at Jealott's Hill (as part of a wider allocation in the area) to meet full cultural needs. However, in their post hearings letter the Inspectors conclude that the required exceptional circumstances for the Jealott's Hill allocation has not been evidenced and that a Main Modification is needed to remove the associated policy from the plan. They go on to conclude in paragraph 47 of their letter that because BFC can demonstrate a five-year supply of deliverable Gypsy and Traveller sites, and the BFLP has a windfall policy with a positive approach to development, that no further compensatory allocations are needed. This means that BFC is unable to help West Berks meet its Gypsy and Traveller pitch needs, should it be determined that there is unmet need within West Berks. |
| Reading Borough Council (RBC) | RBC has concluded that its own unmet need for permanent accommodation for Gypsies and Travellers, Travelling Showpeople and Houseboat Dwellers Accommodation cannot be met within Reading. Meeting Reading's permanent needs is likely to require provision outside our Borough, and therefore RBC is keen to work with WBDC on the development plan for gypsy and traveller provision to discuss wider needs within the area, as well as what resources would be required to help in meeting those needs. |
| Royal Borough of Windsor and Maidenhead | We note that the identified shortfall in Gypsy, Traveller and Travelling Show People pitch provision is intended to be addressed via the preparation of a separate Development Plan document. The Royal Borough has also identified needs for Gypsies, Travellers and Travelling Show People and intends to produce a Traveller Local Plan in order to meet these needs, and as such we welcome West Berkshire's approach to meet the accommodation needs of these groups in full. |
| Wokingham Borough Council (WBC) | WBC broadly supports approach to the provision of Gypsy and Traveller sites and supports the production of the separate DPD to meet needs in full, and raises no issues of soundness in relation to the Plan. Supports the commitment to fully addressing Travelling Showperson need. |
| Environment Agency | As caravans are classed as 'highly vulnerable' under NPPF, we ask that the following wording is added to point vii to read; <i>vii. 'Development avoids areas of high flood risk and if required provide a Flood Risk Assessment, in accordance with Policy SP6: "<u>Caravans are not permitted in Flood Zone 3 as per Table 2 of the Planning Practice Guidance</u>'.</i> This is to ensure the policy is fully compliant with National Planning Policy. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---------------------|---|
| Canal & River Trust | Supports the policy. It is noted that the GTAA does not identify a need for houseboat dwellers and thus the LPR does not provide for any permanent houseboats. The Canal & River Trust cannot comment on whether such a need exists, however any perceived need for residential moorings in the future should be discussed with the Canal & River Trust to ensure that suitable locations are considered. |

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| Cllr Alan Macro | Travelling Showpeople are a separate community group and shouldn't be included in the same policy as Gypsies and Travellers |
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Landowners, site promoters and developers: None

Summary of issues raised:

- Broad support from neighbouring authorities who are keen to continue to engage
- Bracknell Forest Borough Council of the view that transit provision is not a duty to co-operate matter.
- Environment Agency requests that policy makes clear that caravans are not permitted in Flood Zone 3

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM21 Retention of mobile home parks

Number of representations received: 2

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|------------------------------------|---|
| Stratfield Mortimer Parish Council | Parish Councils don't seem to be informed about changes to mobile home parks, which may be reducing the number of homes. This should be part of the planning process so that parish councils can engage in safeguarding their loss as affordable housing. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--------------------|
| Councillor Alan Macro | Policy supported |

Landowners, site promoters and developers: None

Summary of issues raised:

- Policy supported

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM22 Residential use of space above non-residential units

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|-----------------------|---|
| Theale Parish Council | 11.45 in tracked changes version should be reinstated |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

- Only one comment requesting the previous version of para 11.45 be reinstated

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM23 Housing related to rural workers

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies:

| Consultee | Main issues |
|------------------------|---|
| Liberal Democrat Group | Believe this policy is not justified in demanding that such developments have “no adverse impact on the rural character...” (etc.) because there will be so much change in the nature and national importance of land based businesses, owing to needs of food security and changes to agriculture, also to the factors influencing “sustainability”, that this is too restrictive. Suggested amendments to wording supplied. |

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

Only one comment, from the Liberal Democrat Group, who feel point (g) is too restrictive.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM24 Conversion of existing redundant or disused buildings in the countryside to residential use**

Number of representations received: 8

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | Ask that it includes points to ensure any proposed conversion development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors. Suggested wording supplied. |

General Consultation Bodies:

| Consultee | Main issues |
|------------------------|--|
| Liberal Democrat Group | It is not easy to decide whether a building is structurally unsound. Adding this to the list of criteria to be met before planning consent can be given simply adds to the cost and delay and makes it likely that we will have more unsightly crumbling buildings in our rural landscape. We prefer to see the planning decision focus on the outcome of any restoration and re-use and also whether its restoration will result in fewer carbon emissions than if the embedded energy in its original construction is allowed to go to waste. Suggested wording amendments supplied. |

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--------------------|
| Councillor Alan Macro | Support for policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|------------------|---|
| Pro Vision for | Support inclusion of the policy in principle. |

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| <ul style="list-style-type: none"> • Mr. & Mrs. Gent • The Trustees of the Allan Snook Will Trust • Rivar Ltd | <p>Some of the criteria simply require consideration of other DM policies in the LPR, therefore they should be removed as they are unnecessary duplication. Also seems arbitrary which ones have been included while others are omitted. Alternative is for the policy to state that any proposal should comply with other relevant policies within the development plan.</p> <p>Criteria f – criteria is not justified as it does not accord with NPPF 80c). The criteria cannot be sensibly applied as it requires ‘zero harm’ and therefore all conversions would infringe it. Should be reworded: ‘seeks to respect the prevailing rural character of the area’.</p> <p>Criteria g – this goes beyond what is required by national policy, and is double counting as any harm would already be considered under criteria f.</p> <p>Criteria h – also not practical as a ‘zero harm’ criteria. All agricultural conversions would require amenity space e.g. garden land which would include a degree of harm to the character of the area/landscape/</p> <p>Last paragraph – this statement is contrary to the Planning and Compulsory Purchase Act 2004 s 38(6) which confirms that there may be other material considerations outside of the policies in the development. The statement is also vague and ambiguous.</p> <p>There may be circumstances where a new build or replacement proposal in comparison to a conversion scheme may be considered preferable. The statement should be positively worded to allow new build/replacement proposals where the conversion would comply with DM24 and deliver and improvement/enhancement.</p> <p>11.50 – suggests that traditional/historic farm buildings are more likely to be acceptable for conversion than ‘modern’ large agricultural sheds is unsound as national policy does not make any such distinction. Sentence should be removed, each case should be considered on its merits.</p> <p>Amend version of the policy in line with comments supplied.</p> |
| Savills UK for the Englefield Estate | <p>The overall approach is supported. however recommended that the reference to ‘re-use’ of redundant or disused buildings is retained, in line with NPPF paragraph 80, in order to clarify that existing buildings can be brought back into use as well as being converted to a different use.</p> <p>Concerned that the draft policy contains a number of detailed criteria with unnecessary duplication of other policies (e.g. relating to heritage, amenity, access and ecology), and a requirement to ‘retain’ features and fabric for instance, which may prejudice suitable development being delivered in rural areas.</p> <p>Recommended changes to ensure the soundness of the Plan in line with NPPF paragraph 35 supplied</p> |
| Pro Vision for T A Fisher & Sons Ltd | <p>Not consistent with paragraph 80 of the NPPF as there are a number of detailed criteria which are not necessary and/or duplication.</p> <p>The last paragraph should be deleted as contrary to section 38(6) of the Planning and Compulsory Purchase Act 2004</p> |

Summary of issues raised:

Overall approach supported with some objections and changes recommended:

- Environment Agency asks that it includes points to ensure any proposed conversion development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors. Suggested wording supplied.
- Liberal Democrat concern that requiring a building to be structurally sound simply adds to cost and delay.
- Some of criteria are unnecessary duplication of those in other policies.
- Objections to criteria (f), (g) and (h),
- Last paragraph of policy is contrary to section 38(6) of the Planning and Compulsory Purchase Act 2004.
- National policy does not distinguish traditional farm buildings from modern large agricultural sheds and each case should be considered on its merits.
- Suggest reference to re-use' of redundant or disused buildings is retained to clarify that existing buildings can be brought back into use.
- Requirement to 'retain' features and fabric may prejudice suitable development being delivered.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM25 Replacement of existing dwellings in the countryside

Number of representations received: 3

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | To strengthen this policy text to ensure that it is also sustainably viable and adheres to national policy, we ask that it includes points to ensure any proposed development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors. Suggested wording supplied. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|-----------------|---|
| Cllr Alan Macro | Points (d), (e) and (f) should be subservient to point (c). Suggested renumbering supplied. Otherwise, policy is supported. |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Planview Planning for Leibreich Associates | Support the policy but enhancements shouldn't be limited to the placement/siting of a replacement dwelling. Policy is underpinned by objective to protect and enhance the landscape, but does not encourage landscape enhancements, sustainable or innovative design, instead focusing on preventing adverse impacts. Policy does not reflect the objective in the supporting text of improving the landscape character and visual appearance, the only way improvements can be considered are be resisting replacement dwellings. |

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| | <p>Text relating to curtilage is unsubstantiated, short sighted and overly prescriptive. Each site should be considered on its own merits.</p> <p>Criterion g - there may be cases where the existing curtilage may be inappropriate and opportunities for improvements could be made by amending it.</p> <p>Criterion g doesn't echo criterion b, which is more flexible where positive benefits can be demonstrated. The same approach should be taken in criterion g.</p> <p>Policy should be amended to set out what weight will be afforded to developments that provide enhancements to the landscape/design/biodiversity/sustainability and/or innovative/high quality design. Suggested wording provided.</p> |
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Summary of issues raised:

General support for policy.

Main issues raised:

- Suggested wording from the Environment Agency provided to strengthen the policy in relation to flood risk and sensitive receptors.
- Policy does not encourage landscape enhancements, sustainable or innovative design.
- Criterion g - there may be cases where the existing curtilage may be inappropriate. Policy should be flexible as in criterion b.
- Policy should be amended to set out what weight will be afforded to developments that provide enhancements to the landscape/design/biodiversity/sustainability and/or innovative/high quality design

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM26 Extension of residential curtilages in the countryside

Number of representations received: 0

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised: None

Council response: There are no issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM27 Sub-division of existing dwellings in the countryside

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|--------------------------------------|--|
| Savills UK obo the Englefield Estate | The introduction of draft LPR Policy DM27 is welcomed as will help to further meet the needs of rural communities and boost the overall supply of housing. |

Summary of issues raised:

- Support for the policy

Council response: There are no issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM28 Residential extensions**

Number of representations received: 2

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | To strengthen this policy it should include points to ensure any proposed development is not at risk of flood risk and would not cause any detrimental impact to sensitive receptors. Suggested wording supplied. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|------------------|---------------------|
| Cllr Alan Macro | Supports the policy |

Landowners, site promoters and developers: None

Summary of issues raised:

- Support for the policy
- Suggested wording from the Environment Agency provided to strengthen the policy in relation to flood risk and sensitive receptors

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM29 Residential annexes**

Number of representations received: 2

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|--------------------|---|
| Environment Agency | <p>To strengthen this policy text to ensure that it is sustainably viable and adheres to national policy, we ask that it includes points to ensure any proposed development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors</p> <p>To strengthen this policy to ensure that it adheres to national policy, we ask that it includes these bullet points (the criteria required to satisfy proposals for this type of development) suggested below to ensure any proposed development is not at risk of flooding and would not cause any detrimental impact to sensitive receptors.</p> <ul style="list-style-type: none"> • <i>'Development avoids areas of high flood risk and adheres to the <u>requirements of PPG and NPPF and if required provide a Flood Risk Assessment, in accordance with Policy SP6</u></i> • <i>'Development will not result in any detrimental impact on sensitive receptors. The development will satisfactorily address all environmental issues such as wastewater drainage, to ensure the sustainability of the development.'</i> |

General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
|------------------|---------------------|
| Cllr Alan Macro | Supports the policy |

Landowners, site promoters and developers: None

Summary of issues raised:

- Support for the policy
- Suggested wording from the Environment Agency provided to strengthen the policy in relation to flood risk and sensitive receptors

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM30 Residential space standards

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---------------------------------|--|
| Purley on Thames Parish Council | DM30: Inform organisations responsible for making planning decisions of the new Village Plan |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------|---|
| Home Builders Federation | In order to adopt these standards the Council must show that there is a need for such homes within the Borough, but we could not find the evidence referred to in paragraph 11.105 of the Local Plan. If the Council cannot provide sufficient evidence to support the adoption of these standards, then this policy should be deleted. |

Other Stakeholders:

| Consultee | Main issues |
|-----------------|------------------------|
| Cllr Alan Macro | Support for the policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|---|
| Ridgepoint Homes | The size of market units should be determined by market preferences and location rather than stipulated sizes across the whole district. The stipulated requirements could result in additional build costs which may cause some developments to become unviable. Suggest DM30 is amended to apply to affordable dwellings only. |
| White Peak Planning Ltd obo Bloor Homes Ltd | Propose policy should be deleted unless the Council have clear evidence that the requirements of the policy to deliver all new market and affordable dwellings, including from permitted development, change of use and conversions, to nationally described space standards, can realistically be delivered. Bloor Homes Ltd is concerned that the proposed approach may reduce the number of homes delivered and may not represent an efficient or sustainable use of land. |

Summary of issues raised:

- Support for policy
- Council need evidence, both to show need for such homes and that they can realistically be delivered.
- The size of market units should be determined by market preferences and location – policy may affect viability and suggest applies to affordable dwellings only

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM31 Residential amenity

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|------------------------|--|
| Cllr Alan Macro | Object to “where possible” in point (iv). This would provide a “get out” for developers that would undermine the policy. Gardens should always conform to the minimum length of 10.5 metres. Otherwise, policy is supported |
| Liberal Democrat Group | In an urban setting, where residential development is within a short distance of public open space, the need to achieve wider sustainability policy objectives can mean that to insist on a minimum length or area of private amenity space, irrespective of the functional needs of future occupants, is not always justified. By removing any requirement for a specific size of private outdoor amenity space, other than for functions such as hanging out the washing, spaces for growing salads or flowers, or generally personalising that space within reasonable limits, planning policy will enable more effective use of high value urban land and therefore promote more sustainable urban communities. Suggested amended wording supplied. |

Landowners, site promoters and developers:

| Consultee | Main issues |
|------------------|--|
| Ridgepoint Homes | 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 the stipulated minimum |

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| | <p>depth. Varying house design may result in sufficient garden size with shorter garden depth and therefore it would not be appropriate to apply a minimum depth. Suggest point iv. is amended to <i>'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.'</i></p> <p>The 21m minimum distance between habitable room windows could significantly impact site layouts and character of street scenes and result in inefficient landuse, contrary to NPPF 124. Suggest point v amended to <i>'a minimum back-to-back distance of 21 metres between directly facing windows, serving habitable rooms, subject to design and layout.'</i></p> |
| Planning Issues for Churchill Retirement Living | Regarding sub-clause iv – generic design standards for external amenity space for specialist elderly accommodation rarely consider the specific needs of the users. A smaller quantum of high-quality external amenity space is better suited. Request more flexibility for specialist forms of residential development in this standard. |
| Pro Vision for Feltham Properties | General support for policy. Policy should allow for local context to influence the size of gardens and separation between properties, focusing on achieving good design outcomes. Suggested policy wording supplied. |

Summary of issues raised:

- Support for policy
- Policy too permissive – minimum garden length should always be observed
- Policy too restrictive – specifying minimum standards for gardens and separation distances may impact site layouts and lead to the inefficient use of high value land. Should be considered on a case by case basis.

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM32 Designated Employment Areas**

Number of representations received: 11

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---------------------------------|---|
| Wokingham Borough Council (WBC) | New allocations for industrial use insufficient to meet the full identified needs for industrial land and no specific land is identified to provide for office use. WBDC has approached WBC and other duty to co-operate partners to seek assistance in meeting these needs. It is considered highly unlikely any of the unmet office or industrial needs from WBDC will be able to be accommodated and requests continued engagement as part of the duty to cooperate. |

General Consultation Bodies:

| Consultee | Main issues |
|--|---|
| DPDS Consulting for Thames Valley Chamber of Commerce (TVCC) | TVCC supports the general ambition of the policy in so far as it seeks to support and expand business in West Berkshire and supports the redevelopment and regeneration of land within the DEAs to provide additional business development where it is needed. However, in line with comments on Policy SP20 TVCC believes that the policy could go further in setting a positive strategy for the future of the DEA that would guarantee appropriate development/redevelopment and help ensure the best conditions for attracting inward investment. TVCC reiterate earlier comments that a development-plan led and DEA led framework of positive, criteria-led site specific policies for each DEA should be included within the LPR. |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | It is inferred that the Council will use DEA's to restrain the damaging use of permitted development rights to convert business premises to residential use. If correct, that approach is strongly supported. |

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| | <p>The local plan should provide the Council with the opportunity to look again at the evidence and options for LRIE. By only referring to it in one paragraph Page 84: 7.10 it has to be assumed that the planning team are deliberately trying to avoid scrutiny. The football ground is not part of the LRIE and not a DEA. It is clearly and well defined within the current West Berkshire Core Strategy, covered by ADPP2 and CS18. This local plan should provide as a minimum the same level of protection / status.</p> <p>Gateway Plaza and NEW1 are within the London Road Estates DEA but DM32 not robust enough to cover them – should have specific allocation and policy consideration.</p> |
| DPD Consulting Group for Newbury Community Football Group | In light of the Refresh report on the regeneration of the LRIE including the Faraday Road football ground as an area for redevelopment despite it <i>not</i> being part of the DEA, this policy should provide greater clarity on the approach to land on the periphery of DEAs. Suggested additional wording to protect/enhance GI and community facilities, including in DEA's immediate surroundings. |
| Cllr Alan Macro | <p>Office developments in DEAs should be subject to the sequential test.</p> <p>Paragraph 12.7: The statement that “<i>the redevelopment and regeneration of land within DEAs to provide additional business development that meets the needs of the District will be supported</i>” is not restrictive. It is likely to lead to the loss of employment, particularly “blue collar” within DEAs.</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|---|
| Lichfields for BYM Capital | Overbridge Square has been converted to residential use and should be removed from the Hambridge Road/Lane DEA designation as it is not justified. |
| Pegasus Group for Walker Logistics (Holdings) Ltd. | Agree with the proposal to extend the DEA at Membury Estate. This should be extended as a minimum to reflect the boundary of the ESA2 site, but also to include the whole of the site being promoted including the airfield runway and the Walker Logistics complex to the south. |
| DHA Planning for Lesimar Ltd. | Paices Hill/Youngs Industrial Estate does not accurately reflect the potential employment area which could be included in the designation as Land to the south of this DEA has been granted outline planning permission for the construction of an industrial estate. This would be a logical expansion to the DEA, which should be extended to include this area. The plan is not sound as it does not meet its need to for industrial land, and opportunities to increase this have not been taken. |
| Dijksman Planning | Correction needed to the boundary of the Beenham Designated Employment Area – it should include a 0.2ha parcel of land currently used for parking and access for the current industrial area. Would also provide opportunity for future boundary landscaping. |
| Union4 Planning | Protection of employment sites is strongly supported. The location of office development towards accessible centres is also supported and proposals for the redevelopment redundant office stock within employment areas should consider this to ensure the optimum use and employment provision on suitable sites |

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| West Berkshire Council (as landowner) | If the proposed wording for SP21 is not included with that policy, suggest it is included within this policy – suggested wording provided. |
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Summary of issues raised:

- Some support for policy
- Support the use of DEA's to constrain the use of permitted development rights to convert business premises to residential use – if that is the intention.
- Insufficient land to meet the identified need
- Disagree that office proposals won't have to satisfy the sequential test
- Policy should provide guidance for development adjacent to/on the periphery of DEAs
- GI and community facilities should be protected within DEAs
- Should include criteria based, site specific policies for each DEA
- Policy should go further to encourage appropriate development within DEAs
- Policy is likely to lead to the loss of blue collar employment within DEAs
- Some requests to amend DEA boundary areas

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM33 Development within AWE

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|------------------------------------|---|
| Stratfield Mortimer Parish Council | WBC is already informed about development at AWE that will impact on local roads and businesses etc. but this is not referred to or taken into account in the LPR. |
| Environment Agency | Expect that AWE, or any other organisation undertaking new activities in developments considered under DM33 to consult with us if their activities would require environmental permits. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------------|--|
| RPS for Atomic Weapons Establishment | <p>AWE supports the inclusion of this policy which continues the express policy support for development at Aldermaston (AWE A) and in Burghfield (AWE B). The Policy is in accordance with Paragraphs 20 (b), 97 (b) and 187 of the NPPF in terms of a strategic policy which sustains, protects and promotes the established strategic uses at the two sites and their important national security and local employment functions.</p> <p>Paragraph 12.12: In accordance with the representation made against Para 4.37, AWE requests an amendment to the paragraph in order to align with the NPPF reference and also provide consistency through the Local Plan as to how the function of the sites is explained.</p> <p><i>“Both AWE sites as Government research and defence establishments are core to sustaining the UK Government’s national defence and security and in particular the delivery of the warhead contribution to the national and international nuclear deterrent.”</i></p> <p>Paragraph 12.13: AWE is broadly supportive of this paragraph but this should also refer to other enabling works in connection with the development and uses covered under Policy DM33.</p> |

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| Defence Infrastructure Organisation | DIO is supportive of the principle of policy DM33 which recognises the important land use role of defence establishments but has significant concerns that the Plan is not covering wider MOD interests and therefore is ambiguous by focusing on only two of the four defence sites within Plan area. The Plan is unclear to the decision maker on how to consider defence related activity and capability development proposals at Denison Barracks and RAF Welford in a fair and consistent way. The Plan does not make provision to protect Denison Barracks and RAF Welford from third party development proposals in the same way as it does for the two AWE sites. As currently written the West Berkshire Local Plan Review would fail to meet the criteria of paragraph 16 of the NPPF. Suggested policy and supporting text supplied. |
| NuLeaf | Welcome inclusion of this policy. Suggest it is amended in line with West Berks MWLP policy 13 to clarify that any new development at AWE sites which has implications for radioactive waste management should have to demonstrate need and be primarily managing waste that has arisen locally. |

Other Stakeholders: None

Landowners, site promoters and developers: None

Summary of issues raised:

- Some support for policy
- Request for consistent terminology throughout the plan regarding the function of the AWE sites
- Request reference in supporting text to other enabling works in connection with development carried out under this policy.
- Suggest policy is aligned with Policy 13 in the Minerals and Waste Local Plan
- Plan should include provision for the other defence sites within the plan area – Denison Barracks and RAF Welford

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM34 Retail Parks**

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---------------------------------|---|
| Wokingham Borough Council (WBC) | WBDC's existing evidence from 2016 identified a significant need, and it is not clear how far this has been met, or whether the identified needs remain appropriate. WBC stresses the importance of WBDC's evidence being updated as soon as possible and the Plan being reviewed as necessary to address this in the short term. |

General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
|---|--|
| Cllr Alan Macro | The IKEA and Dunelm retail warehouses are not an integral part of the retail park centred on Sainsburys Calcot. IKEA, in particular, is very prominent in the landscape and causes severe traffic congestion at times. Any future development proposal for the IKEA or Dunelm site should not be for retail. "Pincents Lane, Calcot" should be renamed "Calcot Retail Park" and its boundary in the Policies Map should be redrawn to exclude the Dunelm and IKEA sites. |
| Various individuals/ local residents | There is no big out of town retail area and people have to commute between retail areas. Car sites are at either end of Newbury. Recent retail growth at the Clayhill A4 corridor retail area has been built on flood plains and smells from the drainage. Buffers for the Kennet SSSI were not considered and the SuDs aren't working. The Wash Common and Greenham retail areas are growing without any policy in place and will be closer to Sandleford than the Town Centre. |

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| | Policy does not include Town Centre retail or rural service centres – a specific policy on retail and commercial areas is needed. |
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Landowners, site promoters and developers:

| Consultee | Main issues |
|---|--|
| Lichfields for F&C Commercial Property Holdings Ltd | Re Newbury Retail Park. Policy safeguards existing retail parks but at same time constrains future expansion/alteration for further retail and leisure uses without NPPF sequential and impact tests. Draft policy does not allow for flexibility to ensure retail floorspace can be adapted and repurposed. Policy based on historic evidence base. DM34 neither justified nor consistent with national policy and should be removed from LPR. |

Summary of issues raised:

- The evidence of need is dated, and it is not clear whether it is being met
- Retail Park at Calcot should be renamed 'Calcot Retail Park', and its boundary should exclude IKEA and Dunelm
- Policy should cover town centre retail areas, or there should be a separate policy on these areas
- Services provided in retail areas and their locations are disjointed which encourages commuting
- Environmental protection of retail areas should be considered
- Policy is not consistent with NPPF and should be removed
- Policy constrains future growth at existing retail areas and doesn't allow for retail floorspace to be adapted and repurposed

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM35 Sustaining a Prosperous Rural Economy

Number of representations received: 6

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | Unless this policy genuinely addresses sustaining a prosperous rural economy, the industrial development at Membury will destroy the rural surroundings and drive out residents/workers from Lambourn Woodlands. |
| Liberal Democrat Group | We see a need for some mention of West Berkshire Rural Business Forum in the new Local Plan. The Council - especially in its role as Local Planning Authority - should lead initiatives such as Whole Estate Plans that should help achieve more timely decisions and better outcomes for all. Suggested amended wording supplied. |

Landowners, site promoters and developers:

| Consultee | Main issues |
|----------------------------------|--|
| Savills UK for Englefield Estate | For clarity and to ensure that development proposals relating to the rural economy are considered positively, it is recommended that Policy DM35 is amended to refer to 'supporting the rural economy'. The overall provision for development relating to rural businesses is welcomed. However, the requirement for proposals to 'make a long-term contribution' to the rural economy is considered to be onerous and unjustified. Includes considerations which are not unique to development in rural areas (e.g. impacts on heritage) but which are covered by other LPR policies, and therefore the policy as worded has unnecessary repetition. Suggested amendments to wording supplied. |

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| Barton Willmore, now Stantec for Yattendon Estate | Welcome Policy DM35, which encourages a prosperous rural economy. Reservations in relation to point j., which we consider to be inconsistent with NPPF Para 111, which is clear in stating that development should only be prevented refused on highway grounds where there is an unacceptable impact on highway safety or the impact on the road network would be severe. Character and use are not referenced within the NPPF. Suggested amendments to policy supplied. |
| Opus Works for Chartfield Homes and Newbury and Crookham Golf Club (NCGC) | NCGC proposes to replace its existing clubhouse and improve facilities. The policy as worded does not include any reference to enabling development or tacit support for leisure-based uses. The Council currently only recognises enabling development in the context of the preservation of historic buildings. There is a wider scope beyond the protection of heritage assets as confirmed through legal judgements. The policy needs to be amended to include the suggested additional criterion, which will allow for a wider and more appropriate definition of enabling development, which in turn will help to maintain rural enterprises, like NCGC |
| Pro Vision for Wasing Estate | Support provision for economic proposals in the countryside. Criterion a - object to proposed amendments which are onerous and conflict with national policy. No guidance given as to the implementation, and may preclude proposals coming forward. Criterion d – amendments are unjustified and prejudice businesses that may have had to already adapt to changes in circumstances. Contrary to NPPF 82(d). Criterion h – prohibits development that doesn't already have existing buildings and suggests a presumption against new buildings for economic development – contrary to NPPF 84 (a). Criterion j – criteria not justified and goes beyond national policy, should be consistent with NPPF 111. |

Summary of issues raised:

- Some support for policy
- The West Berkshire Rural Business Forum should be mentioned
- The plan should prevent rural businesses and residents from being driven out by industrialisation
- The Council should lead whole estate plans
- The requirement to make a long-term contribution is onerous and unjustified
- Concern some criteria are contrary to or go beyond the requirements of the NPPF
- Policy could be re-worded 'Supporting the Rural Economy'
- Reference to compliance with other policies in the plan is unnecessary and should be removed
- Policy should include enabling provisions for leisure-based activities

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM36 Farm Diversification

Number of representations received: 2

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|--|
| Barton Willmore, now Stantec obo Yattendon Estate | Welcome Policy DM36, which recognises the importance of farm diversification businesses in supporting the rural economy. However point h. requires development proposals not to harm the significance of a heritage asset in accordance with Policies SP9 and DM12. Consider that this Policy is inconsistent with national policy, as it seeks to afford the same level of protection to designated and non-designated assets. Point j. is inconsistent with the NPPF, by requiring that proposals are assessed against their impact on the character of the road. Suggested amendments supplied. |
| Pro Vision for Wasing Estate | The principle of allowing farm diversification proposals is supported. Criterion e – object as unnecessary and does not accord with NPPP 82(d). Criterion h – only requires consideration of other development plan policies therefore should be removed as unnecessary duplication. Criterion j - criteria not justified and goes beyond national policy, should be consistent with NPPF 111. |

Summary of issues raised:

- Support for policy
- Concern some criteria not consistent with or go beyond the requirements of the NPPF
- Reference to other development plan policies is duplication and should be removed

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM37 Equestrian and Horseracing Industry

Number of representations received: 7

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|--|---|
| Lambourn Parish Council | Policy blurs the important distinction between general equestrian use and that of the horse racing industry. This should be made clear. Support 12.53 Agree that proposals should be in keeping with the character and appearance of the area and prevent the spread of the built form in the countryside and AONB. |
| Lambourn Neighbourhood Development Plan Steering Group | Policy blurs the important distinction between general equestrian use and that of the horse racing industry. This should be made clear. Support 12.53 Agree that proposals should be in keeping with the character and appearance of the area and prevent the spread of the built form in the countryside and AONB. |
| Environment Agency | To ensure that it is sustainably viable and adheres to national policy, we ask that it includes points to ensure any proposed development is not at risk of flood risk and would not cause any detrimental impact to sensitive receptors. Suggested wording supplied. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
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| Various individuals/ | LPA does not consider the health and wellbeing of racehorses when making planning decisions in Lambourn. |

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| local residents | Pollution has a negative impact on horse health |
| Lambourn Trainers Association | <p>The Plan could go further –</p> <ul style="list-style-type: none"> • To recognise the importance of the HRI to the rural economy and the Plan’s commitment to the protection and support for growth of the HRI in the strategic policy. • To identify Lambourn’s HRI Cluster in the Policies Map; • To make a clear distinction between equestrian development not related to the HRI and uses and developments for the HRI; • To include the protection of the existing facilities and infrastructure for the HRI in and around Lambourn; • To clarify the relevant consideration and necessary protection of new and existing residential accommodation in association with the HRI; • To include a policy which protects the HRI from developments within and around the HRI Cluster; • To make the suitability test for the protection of the existing HRI facilities and establishments effective and relevant; and • To have regard to the emerging Neighbourhood Plan for Lambourn in relation to more detailed HRI related policies and guidance. |
| Cllr Alan Macro | This policy is covering two distinct subjects. It is aiming to control equestrian developments and to support the horseracing industry – should be replaced by two policies. |

Landowners, site promoters and developers:

| Consultee | Main issues |
|------------------------------------|--|
| WSP on behalf of Mr Charlie Parker | Promoting Windsor House Paddocks in Lambourn - the Policy should allow some flexibility for former land used by the equestrian industry, which is unlikely to be used again in the future (be it unsuitable location, facilities or fragmentation with other similar uses which inhibits the operation), to be reused in ways that still support the industry. One such instance would be the re-use of such land for housing in appropriate locations, subject to a percentage of the housing being reserved for local workers in the industry. |

Summary of issues raised:

- Some support for policy
- The Plan could go further to recognise the importance of the HRI to the rural economy and the Plan’s commitment to the protection and support for growth of the HRI in a strategic policy.
- Policy should be split into two covering controlling equestrian developments and supporting the horseracing industry

- Policy should include provision for flood risk
- Existing facilities should be safeguarded
- The policy should include further elements relevant to the horse racing industry
- Former equestrian land should be released for alternative development where it is unlikely to be used again in the future

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM38 Development on Existing Educational & Institutional Sites in the Countryside

Number of representations received: 3

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|------------------------------------|---|
| Stratfield Mortimer Parish Council | The criteria don't include any measure of forward planning such as 5 or 10 year school population forecasts. This should be included as waiting until the need can be demonstrated is too late as schools need time to plan for the future populations. |

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|---|
| Lucy White Planning for Bradfield College | <p>Broadly support the policy.</p> <p>In order to meet operational needs of Bradfield, it is necessary for development outside of the settlement boundary.</p> <p>Criteria b – 'or in proximity' is of concern. It is not reasonable to assess the suitability of buildings outside of an applicant's ownership to meet their needs.</p> <p>Criteria d – This does not allow for contemporary styles to contrast but complement traditional styles. More recent buildings can be assimilated alongside historic ones. Criteria should be expanded to allow for sensitively designed contemporary buildings where appropriate.</p> <p>Criteria f – minor correction to improve legibility – <i>new or replacement buildings are located adjoining existing buildings or within or adjoining existing groups of buildings.</i></p> <p>Support for proposals identified through estate plans and development frameworks at 12.58 welcomed.</p> <p>Policy DM38 should acknowledge that circumstances may justify staff housing beyond existing settlement boundaries.</p> |

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| Turley for Pangbourne College | <p>Whilst the intent of policy DM38 is supported, it does not acknowledge or make any reference to how development on such sites will be dealt with where they are within the AONB (such as Pangbourne College).</p> <ol style="list-style-type: none"> 1. The policies maps should be amended to give recognition to educational sites within the AONB 2. Additional wording should be added to Policy DM38 in line with that included in Policy DM37 stating: Educational Sites within the North Wessex Downs AONB <p>Whilst conserving environmental quality and countryside character, educational establishments within the AONB will be maintained, and sensitive growth will be allowed for.</p> <p>We also consider that changes are required to the wording of Part F of the Policy which currently places potential unjustified constraints on establishments which may have buildings of heritage value where it is important to preserve their setting or where buildings are required as outliers to the main campus for sporting, boarding or educational purposes. This should be reflected within the policy wording.</p> |
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Summary of issues raised:

- Support for policy
- Policy should also take into account requirements of forecasted needs.
- Sites in proximity are not appropriate if they are not within the same ownership
- Sensitively designed contemporary buildings can be appropriate and should be allowed
- Policy should allow for staff housing beyond existing settlement boundaries where this is justified
- Policy should specify how development within the AONB will be treated
- Policy is too restrictive with regards to operational needs, e.g. outlier buildings may be required beyond groups of buildings

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM39 Local community facilities

Number of representations received: 12

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---------------------------------|---|
| Theale Parish Council | There is no scope for providing outdoor sports facilities, meeting areas etc. as there is no space. An increase in population would place strain on existing facilities. |
| Purley on Thames Parish Council | We would ask the planning authority to take into account these observations from the Purley on Thames Village Action Plan: Consider provision for 'Youth Services' within the Purley area See whether it is possible for Pangbourne pharmace to extend in-house services to Purley on Thames residents Seek opportunities to establish doctor and dental surgeries in Purley Create more places in Purley on Thames schools Buy/rent more local land for the school to use as outdoor play space |

General Consultation Bodies:

| Consultee | Main issues |
|-----------------------|--|
| NHS Property Services | Object to specific wording in this policy. Request the policy be amended to support the principle that where the NHS can demonstrate that a health facility will be changed as part of NHS estate management, that alone will be sufficient evidence that the facility is neither needed nor viable for its current use. Therefore, that alternative uses for such land and property will be fully supported. Alternative policy wording provided. |

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| | <p>Where policies aimed at preventing the loss or change of community assets includes healthcare within its definition, this could have a harmful effect on the ability of the NHS to deliver services and facilities for the community by preventing the disposal of surplus facilities and restricting re-investment in necessary facilities.</p> <p>The policy should consider that some public service providers routinely undertake strategic reviews of their estate aimed at improving the provision of healthcare services.</p> |
| DPD Consulting Group for Thames Valley Chamber of Commerce (TVCC) | TVCC supports the Council's stated aim of retaining local community facilities and stress the importance of local community facilities, for citizens and for the local economy. |
| Theatres Trust | <p>Consider that the policy has been weakened compared to the previous version which was supported.</p> <p>Using viability as the sole measure to justify loss is problematic and to be advised against. However, in this instance it could be justified given the detail of paragraphs 12.67 - 12.72 which outlines the evidence that would be expected.</p> <p>Recommend a minor amendment to this to add a criteria seeking evidence that alternative ownership methods or operation had been explored (such as community or voluntary ownership). This would ensure that viability was tested in a broader sense rather than solely in commercial terms.</p> <p>Recommend that supporting text make clear that sale or rental prices should be based on existing use and condition without development to avoid manipulation of lack of demand due to unrealistic values being set.</p> |

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | The availability of meeting places for voluntary groups and exhibitions is a welcome objective. |
| DPD Consulting Group for Newbury Community Football Group | Supports policy and supports the inclusion of “ <i>Areas or places for community outdoor sport or recreation</i> ” in the definition of local community facilities for the purposes of this policy, but would also suggest that the additional phrase “...within walking distance and in the same geographical area as the existing facility ...” be added. |
| Councillor Alan Macro | Supports policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
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| Savills UK for the Englefield Estate | The overall presumption in favour of local community facilities is supported. |

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| <p>Opus Works for:</p> <ul style="list-style-type: none"> • Bewley Homes PLC and Calcot Park Golf Club • Chartfield Homes and Newbury and Crookham Golf Club.) | <p>Considered that Policy DM39 should provide a mechanism to enable the funding of new and expanded community facility provision. Appropriate wording should be added to the policy to provide greater flexibility and allow for proactive assistance to be given to community assets that will otherwise fail. Suggested wording supplied.</p> |
| <p>Knight Frank for Limes Leisure Investments</p> | <p>A site specific approach to community facilities (in terms of loss) should be adopted, allowing for the market to respond better to current/changing conditions and demand.</p> |

Summary of issues raised:

- Support for policy
- Outdoor sports facilities are constrained by a lack of space, and further increases in population will place strain on existing facilities
- Request for specific facilities in the Purley on Thames area
- Policy should allow for loss where that loss has been considered as part of a wider review of an estate (e.g. NHS) and the facility is no longer needed
- The policy has weakened from the previous version
- Using viability in commercial terms as the sole measure to justify loss is problematic, suggest a criteria be added seeking alternative ownership or operation methods
- Should be clear that sale or rental prices be based on current sale/rental prices and facility condition, to avoid manipulating a lack of demand.
- Should be clear that local facilities are within walking distance, and in same geographical area as existing facilities
- Policy should provide a mechanism to allow for funding/assistance of new/expanded facilities, and facilities that would otherwise fail
- Provisions for loss should allow for a site specific approach and respond better to the market

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM40 Public open space**

Number of representations received: 11

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---------------------------------|---|
| Theale Parish Council | The plan needs to state how it would encompass open spaces within developments. |
| Purley on Thames Parish Council | We would ask the planning authority to take into account these observations from the Purley on Thames Village Action Plan: To buy/rent more land for the school to use as outdoor play space To expand the amount of land at Goosecroft and consideration of an all-weather pitch with floodlights. |

General Consultation Bodies:

| Consultee | Main issues |
|-------------------------------|--|
| NHS Property Services | Support policy in principle. There is a well-established connection between the planning system and public health, and planning has an important role in the provision not only of improved health infrastructure but in addressing wider health determinants. Identifying and addressing the health requirements of developments can deliver healthy, safe and inclusive communities. Therefore support policies requiring active consideration of health concerns. |
| West Berkshire Heritage Forum | The Berkshire Gardens Trust has a larger role than the LPR suggests. It has carried out a survey of historic parks in central and eastern Berkshire and wishes to extend this to West Berkshire. |

Other Stakeholders:

| Consultee | Main issues |
|-----------------------|--------------------|
| Councillor Alan Macro | Supports policy |

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| Various individuals/ local residents | Maintenance of the landscape will depend on owners having the income and desire to do so. For larger landscapes this is straightforward, but for smaller, private landscapes e.g. land attached to housing estates, diversified ownership is not likely to produce desired results. A common policy for maintenance of all publically used landscapes is needed. Should give details on criteria where sports pitches are required. |
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Landowners, site promoters and developers:

| Consultee | Main issues |
|---|--|
| Ridgepoint Homes | The requirement for provision of public open space should be based on the site's local context and the considerations set out in points a-g of the policy. Suggest the policy is amended to remove the hectare per person requirement and just consideration of points a-g. Suggest that the supporting text refer to blue infrastructure and that it be considered as part of the public open space assessment. |
| Boyer Planning for <ul style="list-style-type: none"> • Sovereign • Darcliffe Homes | Sovereign supports the Council in seeking to ensure that public open space is genuinely available in perpetuity to the public at large. However, it would not be practical or desirable for the Council to take transfer of all areas of public open space and in certain circumstances it may be preferable that these are not transferred. Propose that the supporting text is revised to make more explicit allowance for such circumstances. |
| Pro Vision for Feltham Properties | General support for policy. Policy does not allow for flexibility and consideration of local context. While the provision of open space may be possible, it may not be feasible, viable or appropriate. The policy should be flexible to recognise that where developments are close to existing open space, the level of on-site provision should be adjusted in order to maximise design efficiency. |

Summary of issues raised:

- Support for policy
- Should be clearer how open space will be encompassed within development
- Other organisations may be able to have a greater role in the provision of open space
- Policy should address maintenance of open space
- Should include provision for sports pitches
- Policy should be more flexible in responding to the individual circumstances of a proposal
- Should refer to blue infrastructure as well as green infrastructure

- Should be clear there are circumstances where transfer of open space to the Council is not practical/desirable
- Policy should be flexible to allow for a reduction in open space requirements for developments close to open space

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM41 Digital Infrastructure**

Number of representations received: 3

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---------------------------|--|
| Burghfield Parish Council | Should explicitly state support for mobile networks in the policy, not just supporting text and make it clear that the Council supports multiple technology options not just FTTP. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------|--|
| Home Builders Federation | Whilst the HBF supports the Council's desire for such infrastructure it is their responsibility to work with the infrastructure provider to ensure its delivery and enable developments to be connected. Given that the type of connection required of development is also set out in Part R of the Building Regulations we consider it unnecessary to set this out in local plan policy. Paragraph relating to Fibre to the Premises should therefore be deleted. |

Other Stakeholders:

| Consultee | Main issues |
|------------------|---|
| Cllr Alan Macro | (d) " <i>development should consider the mobile telecommunications requirements of the development</i> " is far too vague and developers will be very able to avoid the requirement – "should consider" should be reworded "should provide" |

Landowners, site promoters and developers: None

Summary of issues raised:

- Should have clearer support for multiple technology options, including mobile networks, not just FTTP
- Provision relating to FTTP is unnecessary as it is covered by the buildings regulations, and is the responsibility of the Council and infrastructure providers
- Policy should specify the mobile telecommunications requirements of the development to be provided, not just considered

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM42 Transport Infrastructure

Number of representations received: 14

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|---------------------------------|---|
| Burghfield Parish Council | Should this be cross referenced to SP23, and how the two tie in together? Has there been any thought to producing an online schedule of parking and associated charges to assist people with travel planning and parking? Has there been any thought to working with national and local organisations to create cycle highways to link population centres? |
| Hermitage Parish Council | Particularly support points (a) and (b) as this could build on the success of Eling Way. |
| Purley on Thames Parish Council | We would ask the planning authority to take into account these observations from the Purley on Thames Village Action Plan: 42 – Introduce 20mph speed limit on residential side street. Consult regarding introducing a safer pedestrian access via Goosecroft Lane to Goosecroft Recreation Ground. |
| Theale Parish Council | Theale does not have adequate public transport. The plan needs to address this and state how public transport will be addressed sufficiently. |
| National Highways | Paragraph 12.97: Currently it is not clear what is necessary in terms of transport intervention to support the economic, social and environmental objectives of the Local Plan. Furthermore it is not clear from the documents that the delivery of growth can be controlled such that it is in pace with the availability of necessary transport interventions and that unacceptable impacts on highway safety do not occur, or the cumulative impacts on the road network would not be severe. To ensure that the Local Plan is deliverable, the transport evidence base should demonstrate the Local Plan impact on the SRN and as necessary identify suitable mitigation. It is important that any identified mitigation, which should be set out in the IDP, has a reasonable prospect of delivery within the timescales of when the identified growth is planned. The Transport Evidence base is not yet sufficiently developed to inform a view on whether the plan is sound. |

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| | Technical note supplied with representation |
| Network Rail | This policy should be consistent with NPPF requirements with regard to supporting/promoting sustainable transport. Concerns that opportunities to support sustainable transport and specifically encourage modal shift have been missed. Therefore inconsistent with NPPF 152- 154. |

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------------|--|
| RPS for Atomic Weapons Establishment | Not consistent with national policy. The policy advises that ‘travel activity will be expected to be minimised by the design of developments that support low levels of travel with a focus on local journeys that can be made sustainably.’ However, travel activity should only be expected to be minimised by car. Travel activity by other sustainable modes should be welcomed for the economic benefits that accrue from travel. The policy fails to reference accommodating electric scooters in the event that their use on the external highway network becomes legal. This should be rectified to allow flexibility in approach should such legislation change during the plan period. |
| Canal & River Trust | 12.92 - Pleased to note that opportunities at other locations, including use of the Kennet & Avon canal towpath will be sought where applicable). However, use of parenthesis is incorrect. Kennet & Avon canal is incorrectly named at several locations – 12.92, 5.71, and 12.130 – the ‘and’ should be replaced by an ampersand ‘&’. |

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | The emphasis away from car travel should take account of more working from home. The objective to reduce emissions will be achieved by the move to electric vehicles, rather than by abandonment of car usage, due to the convenience of private motoring. National policy strictly supports the move towards electric transmission and therefore the LPR should include a specific plan for the widespread availability of electric charging points on private and public premises. Bus travel only has a limited effect (judging solely from where I live in Newbury). A strategic approach with more routes may be needed if it is to be better supported. The LPR should not exclude new roads and road extensions should these prove necessary. |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|---|
| Ridgepoint Homes | The provision of charging points for electric vehicles is ambiguous and may cause confusion and uncertainty for developers. Suggest the policy refers to the latest Building Regulations which addresses the requirement for charging points. This would align with policy 44. It may not be feasible for a high provision of charging points where the electricity network is limited. The policy should provide flexibility for this as in the latest building regulations. |
| PSP Consulting for Bampton Ltd. | The movement of people and goods by rail is a fundamental omission from this policy, and places it in conflict with the Minerals and Waste Local Plan policy 22 (transport) and national and regional transport policy objectives. Policy should be amended to include a new criterion: <i>j. measures to improve the movement of people and goods by rail.</i> Supporting text 12.95 should also be extended by adding <i>'including the movement of goods.'</i> Proposed changes to policy and text supplied. |
| Firstplan Ltd, for Englefield Estate | Representation re Rail-Road Transfer Site at Theale. Failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes - support for growth of the Rail-Road Transfer Site at Theale is sought. Suggested amendment to include additional wording to policy and supporting text |
| Barton Willmore, now Stantec for Yattendon Estate | This policy as worded seems to apply to all types of development and does not take into consideration the type and size of developments, as well as their location. Consider that fails to recognise the rural nature of the District and the limited availability of public transport modes in more remote areas. There is a conflict between the requirements of this Policy and Policies DM35 and DM36. On one hand, the Council seeks to support businesses in rural areas, however Policy DM42 is stringent and does not appear to reflect or acknowledge the more limited accessibility in terms of public transport to rural areas. We would therefore encourage the Council to adopt a more flexible approach in relation to the rural economy. Suggested amendments to policy supplied |
| White Peak Planning Ltd for Bloor Homes Ltd | The policy is inconsistent with the NPPF, not justified or effective. The word ' <i>proportionate</i> ' before ' <i>contribution</i> ' in the first paragraph of heading text should be retained and ' <i>where appropriate</i> ' added to criteria f and g |
| Deloitte for Green Park(GPR) | GPR wishes to reemphasise the need for the continued enhancement of sustainable transport options and infrastructure, in particular the M4 corridor, which serves Green Park. This is vital to supporting West Berkshire and the wider Thames Valley area as it continues to grow as an important employment location. GPR continues to request that an additional bullet point is included in Policy DM42 as follows: " <i>Improvements to the M4 motorway and strategic road network in the Thames Valley</i> ". Regarding aspiration that travel activity will be expected to be minimised to support low levels of travel and be reached by local journeys, would like to highlight that the reach of employment parks can extend to further authorities and that |

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| | their locations are often in order to attract tenants wishing to attract high quality employers and employees. Therefore, requiring a sole focus on local journeys could prevent the sustainable growth of employment sites. |
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Summary of issues raised:

- Support for policy
- Both advocacy for more provision of electric charging points, and hesitancy that they may not be able to be provided in areas where electricity infrastructure is limited. Request reference to the latest building regulations to specify/clarify provision for electric charging points.
- Alternative travel/public transport should be more strategic and more fully supported in the policy
- Provision for road infrastructure shouldn't be precluded where this is necessary
- Policy could cross reference to SP23
- Unclear whether the policy sufficiently addresses the transport interventions necessary to support the growth in the LPR
- Opportunities to support sustainable transport and encourage modal shift have been missed
- Solely focusing on local journeys misses the fact that reducing the number of journeys would be more impactful for minimising travel, and could also prevent sustainable growth of rural employment sites.
- Should reference electric scooters in preparation for these becoming legal
- Policy should specifically allow for growth at the Theale Rail-Road transfer site
- Policy should be more specific as to what is required for different scales/types of development
- Conflict with DM35 and DM36 in terms of limited transport options in rural areas. Policy should include more flexibility to accommodate this.
- Policy should include more flexibility for a proportionate approach to be applied depending on the development
- Request for inclusion of improvements to the M4 and strategic road network in policy consideration

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM43 Theale Rail-Road Transfer Site

Number of representations received: 4

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
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| Network Rail | <p>Network Rail is wholly supportive of development of third party rail served sites to maximise modal shift from road to rail. The Theale rail-road transfer site is a key rail freight serving the region and its continued identification as such in DM 43 is fully supported.</p> <p>The last undeveloped parcel of land within this site is owned by Beftonforth, who with Network Rail are working to secure an additional rail sidings and access road, likely for aggregates.</p> <p>There is also significant interest in transporting consumer goods by rail into the area, given West Berks and Reading are major markets.</p> <p>Assessment has shown that a site west of the current Theale rail-road site is the only site suitable for additional road-rail capacity for an Intermodal Rail Freight Interchange (IRFI) to serve the west of the South East.</p> <p>Network Rail and Englefield Estate (landowner) are working jointly to review development options for the land in this regard.</p> <p>Network Rail, Englefield and Beftonforth have prepared a joint statement to work together to ensure development of the Beftonforth site will not prejudice future development of the site further west.</p> <p>Network Rail are fully supportive of the representations of Englefield Estate and Beftonforth regarding the future development of the site.</p> <p>Critical that capability to grow road-rail transfer at Wigmore Land is supported by the LPR, alongside continued support for the existing site.</p> <p>Identification of the full extent of the current site on the policies map is supported, along with policy DM43.</p> <p>The Reg. 18 version of the plan supporting text was more supportive of the potential for growth at the site, largely reflecting the original ECON7 policy. Object to the removal of references to growth in the supporting text for the site in this Reg. 19 consultation, albeit that it is acknowledged that no growth was proposed at the Reg. 18 stage. It is</p> |

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| | <p>understood that the perceived changes in emphasis on growth at the site in the policy text were unintentional, and that nothing in the policy will prevent growth at the site.</p> <p>If not corrected, the removal of the wording relating to growth at the site and failure to expressly identify and support growth of the site, then the LPR is considered unsound, specifically contrary to NPPF 31 regarding up to date evidence that is put forward here but also all the other tests of soundness.</p> <p>There has been no material change in circumstances since the current Local Plan and Local Transport Plan documents were adopted which would justify a different approach being taken. If anything, the declaration of a climate emergency has made it more imperative that rail based transport is supported. The sustainability appraisal has also not assessed a change in approach would perform.</p> <p>If the LPR fails to continue the same policy approach, it will also be contrary to NPPF 11 regarding a presumption in favour of sustainable development.</p> <p>DM43 as currently drafted also inconsistent with NPPF 106c, 106 e, and 83.</p> <p>Schedule of changes included to enable the plan to be found sound – agreed between Englefield Estate and Beftonforth.</p> |
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General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
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| Cllr Alan Macro | <p>Vehicular access to the currently undeveloped southern part of the site (former builder's yard) could have an adverse impact on residents in Wigmore Lane.</p> <p>Policy should require that access should avoid the residential part of Wigmore Lane</p> |

Landowners, site promoters and developers:

| Consultee | Main issues |
|-------------------------------------|---|
| PSP Consulting for Beftonforth Ltd. | <p>Fully support the continued identification of the Theale Railhead under DM43, but disagree with removal of provisions relating to growth that were included in previous policy (saved policy ECON7 of the West Berkshire District Local Plan and policy DC31 in the Regulation 18 consultation for the Local Plan Review). This is not consistent with national or local policy and therefore is not sound.</p> <p>Beftonforth intend to develop their land within the current Theale depot into approximately 300m of new rail sidings used to import aggregates.</p> <p>Also involved with Network Rail and Englefield Estate to explore opportunities for expanding rail use at Theale to include an intermodal (IM) rail freight facility westwards of the existing facility. Beftonforth have agreed to work with the other</p> |

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| | <p>parties to ensure any development of their site will not prejudice any future development of an IM facility. A joint statement between Network Rail, Beftonforth Ltd. and Englefield Estate has been agreed.</p> <p>Support for the safeguarding and acknowledgement of potential growth of rail freight provided in the West Berks Minerals and Waste Local Plan.</p> <p>Draft Local Transport Plan 4 also supports the transition to more sustainable modes for the transport of freight including supporting sustainable growth at Theale Rail depot. The Draft Strategic Investment Plan for the South East identifies 'Theale Strategic Rail Freight Terminal' as area for strategic transport investment for the next 30 years.</p> <p>Even if the removal of references to growth were not intentional and the LPR does not preclude growth, the LPR must now expressly include provision for the expansion of rail-road transfer facilities at Theale. Proposed changed to policy and text supplied.</p> <p>Failure to support growth of rail facilities has significant implications for the Sustainability Appraisal, as the benefits have not been assessed as a reasonable alternative.</p> |
| Firstplan Ltd, obo Englefield Estate | <p>Failure of the LPR to appropriately identify and support modal shift in the context of transshipment of freight changes. The evidence points to the need to support the growth in rail freight provision both generally and in regional/local plan terms. The sound approach (and reasonable alternative) would be to at minimum provide supporting text which supports growth at Theale and/or to otherwise have this expressed within Policy text itself.</p> <p>Suggested additional wording to policy: <u>Expansion of the Theale Site to provide further rail-road transfer, in particular for the transshipment of consumer goods, will be supported subject to other policies in the Local Plan.</u> Additional text also suggested in supporting text.</p> |

Summary of issues raised:

- Support for policy
- Concerns regarding access
- Policy should specifically allow for growth at the Theale Rail-Road transfer site

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR Policy: DM44 Parking

Number of representations received: 15

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies:

| Consultee | Main issues |
|--------------------------------------|--|
| Home Builders Federation | Building regulations clearly set out what is required with regard to electric vehicle charging points for residential development and there is no need for a developer to go beyond these standards. We would therefore recommend that the words “and <i>where there are opportunities to go beyond minimum standards</i> ” is deleted. This will ensure the policy is consistent with paragraph 16 of the NPPF. |
| RPS for Atomic Weapons Establishment | It is understood that the ‘Cycling and Motorcycling Advice and Standards for New Development’ guidance document referred to within the policy does not currently exist and so it is not possible to advise if AWE consider the provision to be correct. However, providing AWE is consulted on the guidance document when it is produced then this is considered acceptable. |

Other Stakeholders:

| Consultee | Main issues |
|---|--|
| Various individuals/ local residents | No provision for business van parking, which will lead to vans being parked in undesirable locations, with security risks. There is a significant amount of social housing in the plan, which is associated with high van use for personal businesses. Residents want and need cars. Public transport is currently insufficient. The standard of 1.25 cars per household is unrealistic. Most households have 2-3 cars. Developments could incorporate more underground parking. |

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| | Where parking provision is restricted, it leads to dangerous parking |
| Cllr Alan Macro | No parking requirements for dwellings larger than 4-bedrooms are given. Otherwise, support policy |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|--|
| Ridgepoint Homes | Support reference to Building Regulations with regard to provision of electric charging points. It is not physically possible to provide 0.5 spaces per unit in isolation therefore the parking standards may cause confusion and ambiguity for developers. Suggest additional commentary is included to confirm that 0.5 space can be delivered through shared spaces. Alternatively, parking could be delivered on aggregate across a whole development. The commentary on travel plans is a duplicate from Policy DM45 and should be deleted. |
| Pegasus Group for Donnington New Homes | Objection is raised to this Policy as drafted because it excludes garages from being counted as part of parking provision on housing sites. No justification has been provided for this. The Policy also fails to acknowledge and allow for the valuable contribution that on-street car parking can make to parking provision on a site, particularly for visitors. |
| Boyer Planning for <ul style="list-style-type: none"> • Sovereign • Darcliffe Homes | Recommended that additional wording is included to clarify that development proposals would be required to meet the most up to date standards where relevant. |
| Barton Willmore, now Stantec for Yattendon Estate | Welcome the Council's approach to assess the level of vehicular parking for non-residential developments to be judged on case by case basis. However, we have reservations about the proportionality of the requirement to provide for other ultra-low emission vehicles, car sharing spaces and car club vehicles. Suggested amendments supplied |
| Turley for Donnington New Homes | Object to the wording of this policy in that it excludes garages from being counted toward parking provision on residential sites. Garages should be included where alternative storage space is provided on plot or within a garage of adequate dimensions for items such as bicycles. Discounting garages as parking spaces will result in the ineffective use of land, contrary to the NPPF. |
| Union4 Planning | The assessment of non-residential parking provision on a case by case basis is strongly supported, given the significant variance in parking demand to different types of development. |
| White Peak Planning Ltd for Bloor Homes Ltd | For residential developments, the policy does not allow for site-specific circumstances to be taken into consideration contrary to Para 107 of NPPF. Wording should be inserted into the policy after the minimum standards table to allow for this. The policy specifies that garages will not be counted as a parking spaces - Some flexibility should be introduced. Clarification in the policy wording required for Zone 2 residential developments where policy does not specify whether half spaces are the minimum spaces plus 1 unallocated space per X dwellings. |
| Lochailort Newbury Ltd | Object to the inflexibility of the minimum car parking standards. The policy directly and indirectly encourages car ownership and usage to the detriment of other more sustainable forms of travel and entirely fails to support the Council's |

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| | declared climate emergency. It fails to acknowledge that there will be circumstances where parking levels as proposed would be wholly inappropriate taking into account location, access to public transport, local amenities and the type of development proposed and inherent car ownership patterns. Maximum restraint should be applied to parking levels in highly sustainable locations such as in the centre of Newbury. Suggested amendment supplied. |
| Hathor Property Ltd. | Object to exclusion of garages counting towards parking. Garages should be included where alternative storage space is provided, or where garage dimensions also allow for storage. |

Summary of issues raised:

- Some support for policy, particularly for non-residential developments to be considered on a case by case basis
- Electric vehicle charging points should be as in the buildings regulations, no need to go further
- Parking for vans should be provided for
- Garages should be included in the parking provision, where they are large enough or alternative storage space is available
- 'Cycling and Motorcycling Advice and Standards for New Development' – document is referred to but is not yet available
- Policy is too inflexible, should allow for site-specific circumstances and other factors such as on-street parking and proximity to public transport to be taken into account
- Solution for 0.5 parking space is needed – could be through shared spaces or delivered on aggregate throughout a development
- Should consider underground parking
- Parking standard is insufficient, most households have 2-3 cars
- Should include parking requirements for dwellings larger than 4 beds.
- Concern over requirement for provide for ultra-low emission & car club vehicles and car sharing spaces
- Commentary on travel plans duplicates DM45 – should be deleted.
- Policy should require proposals to meet most up to date standards
- Clarification required for zone 2 residential dwellings

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)**Proposed Submission LPR Policy: DM45 Travel Planning**

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:**Statutory Consultees:**

| Consultee | Main issues |
|---------------------------------|---|
| Purley on Thames Parish Council | We would ask the planning authority to take into account these observations from the Purley on Thames Village Action Plan: DM45 – Introduce 20mph speed limit on residential side street. Consult regarding introducing a safer pedestrian access via Goosecroft Lane to Goosecroft Recreation Ground. |

General Consultation Bodies: None**Other Stakeholders:**

| Consultee | Main issues |
|---|--|
| Councillor Alan Macro | Support for policy |
| Various individuals/ local residents | The emphasis away from car travel should take account of more working from home. The objective to reduce emissions will be achieved by the move to electric vehicles, rather than by abandonment of car usage, due to the convenience of private motoring. National policy strictly supports the move towards electric transmission and therefore the LPR should include a specific plan for the widespread availability of electric charging points on private and public premises. Bus travel only has a limited effect (judging solely from where I live in Newbury). A strategic approach with more routes may be needed if it is to be better supported. The LPR should not exclude new roads and road extensions should these prove necessary. |

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|---|
| Ridgepoint Homes | The requirement to provide a travel information pack for developments of 10 sites or more dwellings conflicts with the NPPF 113 as it cannot be considered that all developments of this scale will generate significant amounts of movements. The cost of preparing this information for this scale of development may also render them inviable. Suggest this section of the policy is deleted. |
| White Peak Planning Ltd for Bloor Homes Ltd | Monitoring is not compulsory once targets within travel plans have been met. The statement “ <i>regular monitoring and reporting in line with the requirements of the council</i> ” is, therefore, a concern without clarification as to what those requirements are. Suggested amendment supplied. |

Summary of issues raised:

- Support for policy
- Should include provision for electric charging points on public and private premises.
- Alternative travel should be more strategic and more fully supported.
- Provision for road infrastructure shouldn't be precluded where this is necessary.
- Policy is onerous and conflicts with the NPPF
- Clarification on monitoring requirements should be provided

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Appendix 1: Monitoring & Delivery

Number of representations received: 5

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | <p>Table 11 - The monitoring of "Number of net dwellings completed" as a delivery indicator is an insufficient measure of whether or not the Council is meeting the district's housing needs as it fails to take into account whether these dwellings are occupied or not. I propose that a measure to be added which takes into account suitable occupancy of total and newly developed dwellings.</p> <p>The Monitoring Indicators titles do not tie up with the categorisations used within the Objectives or the LPR Chapters, therefore they feel illogical and will be difficult to track. However as each MI does list perceived relevant Policies it leads one to wonder why they were not better grouped within the Plan and the DMs appropriately numbered.</p> |
| Cllr Alan Macro | <p>Table 10: No target is given for "Number and percentage of applications approved which include renewable, zero and low carbon energy technologies. Challenging targets should be given.</p> <p>Table 11:</p> <ul style="list-style-type: none"> • The target of 538 is the top of the range of 513 to 538 dwellings per annum given in policy SP12. It should be 513 dwellings per annum. • The Secretary of State's Written Statement of 6th December 2022 removed the need to maintain a 5YHLS for Local Authorities with up-to-date Local Plans – target should be removed. • No target is given for the use of previously developed "brownfield" land. Use of brownfield land is a government and council priority. A challenging target should be given. |

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| | <ul style="list-style-type: none"> • Affordable housing: The target of 30-40% on site of 10+ dwellings does not make it clear that 30% is for developments on brownfield land and 40% is for developments on greenfield land. • No target is given for number of net dwellings completed by dwelling size <p>Table 14: Target of “decrease in numbers” is not suitable as a reduction could be caused by total loss of sites.</p> |
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Landowners, site promoters and developers: None

Summary of issues raised:

- Some concern about the appropriateness of some indicators used and some presentational amendments proposed

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Appendix 2: Settlement Boundary Review

Number of representations received: 29

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees:

| Consultee | Main issues |
|----------------------------------|--|
| Hampstead Norreys Parish Council | Hampstead Norreys settlement boundary should be changed as per suggested amendment due to inability of the water infrastructure in Water Street to cope with development of 'The Paddock'. |

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|---|---|
| Various individuals/ local residents | <p>Pleased to see comments from Boxford Parish Council have been accepted and no further changes to the boundary are proposed.</p> <p>The settlement boundary criteria do not adequately cover hamlet settlements, particularly for cul-de-sac hamlet settlements such as Westbrook (within a conservation area) which require protection from damaging development. It would be useful to reference the special characteristics of hamlet settlements as opposed to villages, with reference to maintaining the historic nature of a hamlet at risk from traffic, parking, infilling of gardens and paddocks and double stacking house development.</p> <p>Suggested amendment: <i>Where small settlements have particular and often individual characteristics such as hamlets, cul-de-sacs in rural areas that are within conservation areas, every effort will be made to preserve the character of the</i></p> |

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| | <p><i>settlement by not extending settlement boundaries to allow the distinct and historic nature of the settlement to change in a way that loses its identity.</i></p> <p>Include symbol to indicate which settlements are rural.</p> <p>Exclusion of large gardens or other areas needs qualification as the extent of enclosure provided by existing features such as walls/hedges is relevant.</p> <p>Suggested amendment to ‘The extended curtilages of dwellings <u>and other buildings</u> where future development has the capacity to <u>substantially</u> harm the structure and character of the settlement’ to provide flexibility.</p> <p>Some of the defined settlement boundaries do not sufficiently reflect the varied character of the settlement concerned.</p> <p>The current alignment of the Cold Ash settlement boundary at Alley Gully, Bucklebury Alley, should be revised to exclude area of green infrastructure.</p> <p>The settlement boundary around North East Thatcham should be amended.</p> |
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Landowners, site promoters and developers:

| Consultee | Main issues |
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| Southern Planning Practice for Saunders Family | The settlement boundary change we requested does not appear to have been included at Reg. 19. Suggest revision to include land east of Stoney Lane, which would result in a logical rounding of the urban area of Newbury. It would also fit the recently approved planning application at Coley Farm. |
| Pro Vision obo Rivar Ltd. | Considered that West Berkshire’s housing target should be increased and concern that the Council expected housing supply is not sufficient to meet the minimum LHN and will lead to a significant housing shortfall across the plan period. The settlement boundaries should be amended further to provide additional opportunities for growth, including at ‘Land adjacent New Road, Newbury’. |
| Pro Vision obo CALA Homes | Proposed change on southern part of Hungerford follows no obvious physical features on the ground and new alignment suggested. |
| Bluestone Planning for Mr & Mrs T Gallagher | The criteria in Appendix 2 indicate that significant parts of settlements will be considered as being in the ‘open countryside.’ However they will provide support for local services and are generally included as part of the settlements for ONS statistics. The NPPF recognises a social sustainability goal. Dwellings on the edge of settlements such as Goring and Streatley contribute to achieving this aspect of sustainability, which is a significant omission in the LPR. Settlement boundary at Streatley should include Land at Vicarage Lane (Waterford House, the Old Vicarage and Windrush) (alternative boundary supplied). The Conservation Area Appraisal and Village Design Statement both include the dwellings within the settlement boundary. |
| Turley Associates for Pangbourne College | The settlement boundary around Pangbourne should be reviewed to include the whole of the Pangbourne College Boathouse – the current boundary artificially dissects the site. |

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| | Settlement boundary needs to be redrawn to accommodate an appropriate level of growth. |
| Carter Planning Limited for Mr R L A Jones | The Plan's review of settlement boundaries was previously poorly applied and continues as settlement boundaries have not been <u>comprehensively</u> re-examined. Site LAM007 should be included in the Draft LPR. |
| Pro Vision for the Trustees of Allan Snook Will Trust | Council's decision not to take forward settlement boundary at 'land north of Laburnum Cottages, Boxford' is flawed as there is a need to significantly increase the supply of housing in West Berkshire. Parish Council views should not take precedence of professional officer judgement. 'Land to the West of Westbrook Cottage' is available for inclusion within the Boxford settlement boundary. Suggested amendment to settlement boundary provided. |
| Iver Consulting Ltd for Prosper Infinity Ltd | Thatcham settlement boundary runs along Lower Way, thereby excluding a development site from the built-up area. Request amended to include former Newbury Leisure Park. |
| Pro Vision obo Mr & Mrs Pittard | 'Land at Lower Way Farm, Thatcham' (HELAA ref: THA9) could be accommodated within a revised settlement boundary, given its modest scale. It is considered that the development of this site would relate well to the existing settlement pattern. |
| Barton Willmore, now Stantec obo Yattendon Estate | Due to its scale and functional relationship, the existing built form to the south of the existing boundary should be included within the Yattendon settlement boundary. Request that the settlement boundary for Yattendon is expanded to include the cricket pitch, The Withys, Home Farm Cottages and the Renegade Brewery. Should the Council not wish to include the cricket pitch, a second separate settlement boundary for Yattendon should be introduced to comprise The Withys, Home Farm Cottages and the Renegade Brewery. |
| Celia Geyer | Agues for inclusion of access track and rear garden of Tree Tops, Forge Hill, Hampstead Norreys |
| Opus Works obo Chartfield Homes and Newbury & Crookham Golf Club | Request that the land identified for development at NCGC to be included within the revised settlement boundary of Newbury, particularly in light of the significant uplift and long-term retention of a Local Community Facility (Policy DM39) this would enable. |
| ProVision obo Sir Richard Sutton Limited | Supports the proposed amendment to include land to the rear of 38-47 Ermin Street. |
| Barton Willmore, now Stantec obo Donnington Valley Group Ltd | Representation re Land at Donnington Valley Golf Course: Request that Council reconsider the scope of the settlement boundary review around Donnington to include our client's site. |
| Pro Vision for Feltham Properties | Newbury – recent development immediately south of Newbury College appears to have been overlooked where there is now a primary school (Highwood Copse). The boundary should include the school and access road. No public consultation on the settlement boundary review and therefore no comments have been able to be provided until this relatively late stage in the process. |
| Jane Parkin & Charles Manly | Argue for inclusion of Mophetts Lane, Chieveley |

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| Mrs. M. Blackburn | Fully support the settlement boundary review for Brightwalton. |
| Planview Planning for Leibreich Associates | The settlement boundary review has not given regard to the objective of optimising previously developed land. These sites could offer opportunities to develop land which is sustainably located and could deliver visual enhancements. |
| Lucy White Planning for Bradfield College | Support the settlement boundary incorporating the full extent of the indoor tennis centre, sports centre park, Crossways House, boarding houses at the top of the hill and teaching facilities on Buscot Hill. The boundary should also include: The Moat – used for goods deliveries, and staff accommodation west of Faulkner’s Green. The inclusion of these areas would accord with NPPF 79 and 84. Inclusion of staff accommodation would allow the college to deliver an improved mix of houses to meet the needs of staff and more efficient use of land. The Moat is included in the Bradfield College Campus Development Framework (2019) agreed with WBC and including this building would align with the agreed principles. |
| Charlesgate Homes | The settlement boundary has been amended to include Oakley Drive and Burghfield Park, but this is not a natural defining line to base a settlement boundary. The settlement boundary of Burghfield should include HELAA BUR11 (SUR1). |

Summary of issues raised:

- Some support for approach taken and some objections
- Some suggestions from site promoters that boundaries should be further amended to accommodate additional opportunities for growth
- Some suggestions to amend the SBR criteria
- A number of specific suggestions to alter the boundaries in the following settlements – Boxford, Bradfield, Burghfield Common, Chieveley, Cold Ash, Donnington, Hampstead Norreys, Newbury, Pangbourne, Streatley, Thatcham and Yattendon

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Appendix 3: AWE land use planning consultation zones

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|-------------------|--|
| Charlesgate Homes | Not specific to Appendix 3 – issues raised under response to SP4 |

Summary of issues raised:

- To be considered under the issues raised under Policy SP4

Council response: The representation has been noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Appendix 4: Designated Employment Areas

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|------------------|---|
| Paula Saunderson | Should include a map for the DEAs as they are not available on GIS and the Policies Map does not appear to be GIS enabled |

Landowners, site promoters and developers: None

Summary of issues raised:

- A map of each DEA should be included

Council response: The comment has been noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Appendix 5: Residential Parking Zones

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|------------------|--|
| Ridgepoint Homes | Suggest residential Parking Zone 1 in Theale is extended westwards to include the site at 'Lakeside, The Green, Theale'. The planning permissions for this site require a pedestrian and cycle route to Station Road which would enhance the sustainability of the site and justify reduced parking standards. |

Summary of issues raised:

- Boundary amendment proposed to Parking Zone 1 in Theale

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Appendix 6: How policies are applied in a Neighbourhood Planning context

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|-----------------|---|
| Cllr Alan Macro | The Secretary of State’s Written Statement of 6th December 2022 removed the need to maintain a 5-year housing supply for Local Authorities with up-to-date Local Plans – this section should be removed |

Landowners, site promoters and developers: None

Summary of issues raised:

- Suggestion to remove the reference to the need to maintain a five year housing land supply

Council response: The comment has been noted. The response does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Appendix 7: Schedule of policies to be superseded/ deleted

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|---|--|
| Knight Franks for Limes Leisure Investments | The Newbury Racecourse Core Strategy strategic allocation (CS2) should be carried forward in the LPR as not all of the reserved matters applications have come forward and there is scope to deliver additional growth in the future (e.g. at Nuffield health site). |

Summary of issues raised:

- Request to carry forward the Core Strategy strategic site allocation at Newbury Racecourse

Council response: The comment has been noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Appendix 8: Housing Trajectory

Number of representations received: 2

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders: None

Landowners, site promoters and developers:

| Consultee | Main issues |
|--|---|
| Pro Vision obo <ul style="list-style-type: none"> • Newbury Racecourse plc. • Rivar Ltd. | The housing trajectory likely to lead to a shortfall of housing across the plan period due to reliance on windfall sites and large strategic sites (e.g Sandleford and NE Thatcham) that are questionable in terms of their deliverability and overly optimistic assumptions about delivery rates. The housing trajectory will need to be updated given the need to allocate additional sites for housing over the plan period. It is also considered that the Plan at Appendix 8 should include the individual phasing of sites to assist monitoring. |

Summary of issues raised:

- The individual phasing of sites should be included
- Other issues to be considered under Policy SP12

Council response: All comments have been noted. The representations do not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.

Responses received to the Proposed Submission Local Plan Review (consultation 20th January – 3rd March 2023)

Proposed Submission LPR: Appendix 9: Glossary

Number of representations received: 1

Main issues raised pursuant to Regulation 19/20:

Statutory Consultees: None

General Consultation Bodies: None

Other Stakeholders:

| Consultee | Main issues |
|------------------|---|
| Paula Saunderson | It fails to include some frequently used terms such as: Rural, Countryside, Heritage, Green Gaps, Designated Employment Areas and Residential Parking Zones |

Landowners, site promoters and developers: None

Summary of issues raised:

- Some additional terms proposed

Council response: The comment has been noted. The representation does not raise any issues which would prevent the Council from proceeding in accordance with the Proposed Submission version of the LPR. The Inspector may wish to make some modifications during the course of the Examination.