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Planning Policy  
Development and Planning  
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Council Offices  
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Dear Sir / Madam,

**WEST BERKSHIRE LOCAL PLAN REVIEW 2022-2039: PROPOSED SUBMISSION (REGULATION 19) (JANUARY 2023)**

I write on behalf of the Englefield Estate in response to the Local Plan Review (LPR) 2022-2039 Proposed Submission (Regulation 19) consultation currently being undertaken by West Berkshire Council (WBC).

The Englefield Estate has significant landholdings in the east of the District and therefore has a particular interest in the LPR. Representations have been submitted on behalf of the Estate to the previous LPR Regulation 18 consultations in March 2018, December 2018 and February 2021. In line with previous representations, the representations hereby submitted to the current Regulation 19 consultation consider:

- The proposed spatial strategy and the provision for development at sustainable locations in the Eastern Area;
- The overall proposed approach towards housing delivery to meet local needs and support rural communities;
- The proposed strategy for development in the AWE Detailed Emergency Planning Zone (DEPZ) and the approach towards monitoring and review of the DEPZ boundary;
- The need for consideration of cross-boundary issues and neighbouring development at Green Park; and
- The need for an appropriate scale of development to be accommodated at rural settlements and appropriate countryside locations.

This response provides observations on specific policies and paragraphs in the LPR 2022-2039 Proposed Submission and its evidence base in order to inform the ongoing progress of the LPR as it continues through Examination. As identified below, there are a numbers of aspects that do not meet the tests of soundness in paragraph 35 of the National Planning Policy Framework (NPPF) (2021) and therefore require modification.

The response is structured according to the relevant chapters within the LPR 2022-2039 Proposed Submission consultation document as listed below, with reference to supporting evidence studies.

- Chapter 4: Development Strategy: Our Place Based Approach;
- Chapter 5: Our Environment & Surroundings;
- Chapter 6: Delivering Housing;
- Chapter 7: Fostering Economic Growth & Supporting Local Communities;
- Chapter 9: Development Management Policies: Our Place Based Approach;
- Chapter 11: Development Management Policies: Delivering Housing; and
- Chapter 12: Development Management Policies: Fostering Economic Growth & Supporting Local

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## Chapter 4: Development Strategy: Our Place Based Approach

### Policy SP 1 Spatial Strategy

It is noted that the overall proposed spatial strategy set out in draft LPR Policy SP1 generally reflects that of the adopted Core Strategy, with new residential and employment development predominantly focused towards Newbury and Thatcham (as referred to at paragraph 4.13). This overall approach is supported by the Council's Settlement Hierarchy Review Topic Paper (November 2020), which identifies Newbury and Thatcham as the most sustainable locations for development in the District and follows the NPPF (paragraph 68) guidance which seeks to direct development to the most sustainable locations. It is however important to note that previous large allocations at Newbury and Thatcham (including the 2,000 home allocation at Sandford Park) have been delayed in coming forward, as set out in the Annual Monitoring Report (AMR) 2022 (published January 2023), and that Newbury and Thatcham are subject to a number of constraints including heritage (including a Registered Battlefield south-west of Newbury), flood risk and a Nutrient Neutrality Zone north-west of Newbury. On this basis and given that the AONB covers 74% of the District, it is particularly important that an appropriate amount of development is also 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 across the District and that the vitality of other settlements is maintained.

The Sustainability Appraisal (SA) states that, in considering the option for an 'increased focus on the Eastern Area' – *'This option is not considered to be a reasonable alternative due to the constraints relating to the DEPZ for AWE Burghfield and the long term nature of the Grazeley settlement proposal to meet the growth needs of Reading.'* However, 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. It is important to note that the DEPZ is reviewed every 3 years (as referred to at paragraph 4.16) and was recently subject to minor amendments made in January 2023. Furthermore, an Inspector recently allowed a residential development of 49 units within the DEPZ at Three Mile Cross (within Wokingham borough) (ref. 3304042), where he concluded based on detailed examination that there was a 'very small' risk of an incident and that *'there would be no harm with regard to the proximity of the AWE Burghfield site.'* On this basis it is considered that a more positive and proactive approach should be taken to addressing these issues to accommodate sustainable development within the Eastern Area, in line with NPPF paragraph 121.

Policy SP1 itself states that, within the Eastern Area, Theale will be a focus for additional housing; however, provision for additional housing at Burghfield and Tilehurst through Neighbourhood Plans (as proposed in the previous Reg 18 consultation), including 175 units at Tilehurst has been deleted. This appears to be on the basis of the DEPZ designation relating to Burghfield and on the basis that Tilehurst Parish Council decided not to allocate any sites in the recent Neighbourhood Plan consultation undertaken, as referred to in the Housing Background Paper. The provision for 175 units at Tilehurst has not been redistributed elsewhere in the Eastern Area and so there is a reduction in the amount of development proposed in the Eastern Area compared to the previous Reg 18 consultation. The first part of draft Policy SP1 states that *'The focus of development in each spatial area will be required to follow the District-wide settlement hierarchy set out in Policy SP3'* – which in the Eastern Urban Area includes the 3 Rural Service Centres of Theale, Burghfield Common and Mortimer. Taking into account the roles of Theale, Burghfield Common and Mortimer in the District (referred to further below) and the recent provision made for development within the DEPZ, greater provision should be made for additional housing at these settlements in the Eastern Area in order to ensure certainty of future housing supply. This approach will also provide flexibility for the Council to respond to changes in circumstance e.g. amendments to the DEPZ boundary.

Notably, draft LPR Policy SP1 also makes no reference to the potential for additional housing supply at Mortimer, one of the largest settlements in the Eastern Area. The village is however located just outside the DEPZ and is therefore a less constrained area that has the greater opportunity to accommodate development

in the Eastern Area. Draft LPR Policy SP14 acknowledges the 110 units allocated in the Stratfield Mortimer Neighbourhood Plan, however this only covers the period to 2026 and therefore does not account for the LPR plan period to 2039. Paragraph 6.38, supporting Policy SP14, states that no additional dwellings are proposed based on incorrect reference to Mortimer being a 'Service Village' with 'some limited development potential'. Mortimer is however a 'Rural Service Centre' in the second tier of the Settlement Hierarchy alongside Burghfield Common and Theale as set out in draft Policy SP3. Given the sustainable and relatively unconstrained location, the LPR spatial strategy should therefore make additional provision for development at Mortimer.

Draft LPR Policy SP1 adds that the Eastern Area will '*continue to be important for business development with the retention of DEAs*' (Designated Employment Areas). Whilst the importance of business development within the area is welcomed, it is considered that this reference should be broadened to not only refer to DEAs but also existing employment areas (within and adjacent to the District boundary) and the rural economy (as referred to elsewhere within Policy SP1) which also provide an important contribution to the local economy. In this regard it is welcomed that draft Policy SP1 has been updated to specifically state that '*Proposals to strengthen and diversify the rural economy will be encouraged...*' and '*Existing small and medium sized enterprises within the countryside will be supported...*'

On this basis, Policy SP1 as currently worded does not meet the tests of soundness set out in paragraph 35 of the NPPF. The following changes are therefore recommended in order to ensure the soundness of the Plan:

*"...Theale, **Burghfield Common and Mortimer** will be a focus for additional housing **including** through existing commitments and new allocations.*

*The area will continue to be important for business development ~~with~~ **through** the retention of DEAs **and existing employment sites and through proposals to strengthen and diversify the rural economy ...**."*

#### Policy SP2 North Wessex Downs AONB

Draft LPR Policies SP1 and SP2 propose to continue the Core Strategy approach of allowing '*appropriate and sustainable growth*' in the AONB, with provision made for residential development across a mix of several large, small and medium sites predominantly in the west of the District (draft LPR Policy SP15). In light of the increasing housing needs in the District (explained further below) and the challenges of accommodating these needs, 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. A positive approach should be taken to considering development proposals which are commensurate in scale and extent in the AONB which reflects guidance set out in paragraphs 78 and 172 of the NPPF.

#### Policy SP3 Settlement Hierarchy

The overall settlement hierarchy, set out in draft LPR Policy SP3, also reflects the adopted Core Strategy. This includes continued identification of Burghfield Common, Mortimer and Theale as Rural Service Centres in the second tier of the hierarchy, which is supported. Each of these settlements scored consistently highly in the various stages of the settlement assessment (section 6 of the Settlement Hierarchy Review Topic Paper (November 2020)) and therefore this categorisation is justified and is supported. Table 1 of the LPR describes and emphasises the importance of Rural Service Centres as, '*Settlements with a good range of key services and opportunities for employment, community and education. They serve a wide catchment area and contain reasonable accessibility and regular public transport provided to a number of destinations.*'

Parts h to j of Policy SP3 set out the types of development that may be considered appropriate in the Service Villages, including infill development, change of use, non-strategic allocations and rural exception schemes. It is not clear why the provision for 'other minor development' has been deleted, which could include appropriate residential / non-residential extensions or alterations for instance, and reference to First Homes exception sites

(supported by Policy DM16) has also been omitted.

It is noted that the settlement assessment considered only the settlements previously identified in the Core Strategy and Housing Site Allocations DPD (HSA DPD) and does not consider other smaller settlements (paragraph 4.2, Settlement Hierarchy Review Topic Paper (November 2020)). It is also notable that the Settlement Hierarchy Review Topic Paper (November 2020) has not been updated to accompany the current Regulation 19 consultation and therefore any subsequent changes to settlements, or representations to previous Local Plan consultations, have not been fully considered in the current evidence base informing the settlement hierarchy. Whilst the settlement hierarchy helps to inform the appropriate location of development, in order to account for changes to local services and facilities, it is important that the suitability of individual settlements to accommodate development is kept under constant review and that the hierarchy is not applied rigidly.

Notwithstanding the above, it is important to ensure that the Settlement Hierarchy set out in Policy SP3 informs the spatial strategy for new development set out in Policy SP1, in order to ensure that the Plan is effective and justified and meets the tests of soundness in NPPF paragraph 35. It is noted that Policy SP3 states *'The focus of development will follow the District-wide settlement hierarchy'*, with Theale, Burghfield Common and Mortimer all identified as 'Rural Service Centres' within the Eastern Area. However as set out above, 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.

It is noted that the Council has also undertaken a review of settlement boundaries across the District, as set out in the Settlement Boundary Review Background Paper (December 2022) and summarised in the LPR Appendix 3. This has included consideration of settlements without an existing settlement boundary including Englefield.

As set out in our previous representations, Englefield village has a range of local community services and facilities including St Mark's Church, Englefield C of E Primary School, Englefield Stores and Tea Room, Englefield Garden Centre, market garden, social club and children's nursery and local employment provision. Indeed the size of the village and its level of services and facilities exceeds that of other villages within the District with a settlement boundary. On this basis it is considered appropriate for a settlement boundary to be identified at Englefield to facilitate sustainable development.

It is noted that the LPR does not however propose to introduce a settlement boundary at Englefield and it does not appear from the Settlement Boundary Review Background Paper (December 2022) that this has been fully considered. Paragraph 19 explains that *'The informal nature of most of these settlements and the strong relationship they have as part of the wider rural landscape still means that the introduction of a boundary is still not considered the best way forward'*. However, no specific assessment of Englefield is included and it is not therefore clear from this brief conclusion that the criteria for reviewing settlement boundaries (Appendix 1 of the Settlement Boundary Review Background Paper) has been followed.

The NPPF (paragraph 79) is clear that local authorities should *'promote sustainable development in rural areas'* and *'identify opportunities for villages for villages to grow and thrive'*. Accordingly, given the range of services and facilities and relative sustainability of Englefield, it is considered that a settlement boundary should be identified.

On the basis of the above, Policy SP3 as currently worded, based on the supporting evidence, does not meet the tests of soundness set out in NPPF paragraph 35. The following changes are thereby recommended in order to ensure the soundness of the Plan:

- Policy SP3 should be informed by an updated Settlement Hierarchy Review to include consideration of other smaller settlements beyond those currently identified in the Core Strategy and HSA DPD;
- Policy SP3 should be used to inform the proposed spatial strategy set out in Policy SP1 to include Theale, Burghfield Common and Mortimer as the focus for development in the Eastern Area;
- Policy SP3 should be informed by an updated Settlement Boundary Review to include full assessment

- of Englefield based on the assessment criteria; and
- Parts h to j of Policy SP3 should be amended as follows:
  - *“h. Infill or changes of use **or other minor development** within the settlement boundary;*
  - *i. Non-strategic sites allocated for housing and economic development through other policies in this Plan the LPR or neighbourhood plans; ~~and~~*
  - *j. Rural exceptions affordable housing schemes; **and***
  - ***k. First Homes exception schemes.**”*

#### Policy SP4 AWE Aldermaston and Burghfield

It is acknowledged that the DEPZ for AWE Burghfield was extended in 2020 and is now a greater constraint to future development in the Eastern Area. However, it is important to note that some recent development in the DEPZ has been considered to be appropriate. In January 2023, as referred to above, an Inspector allowed a residential development of 49 units within the DEPZ at Three Mile Cross (within Wokingham borough) (ref. 3304042), where he concluded based on detailed examination that there was a ‘very small’ risk of an incident and that *‘there would be no harm with regard to the proximity of the AWE Burghfield site.’* Whilst the potential hazards of the AWE sites are recognised, it remains important that a positive approach is taken to considered development proposals in line with NPPF paragraph 38, in order to ensure that suitable sustainable development can be accommodated where possible.

Supporting paragraph 4.61 explains that, *“During the plan period there may also be changes to the DEPZ as a result of the requirement under REPPiR legislation to undertake formal reviews of the DEPZ at least on a 3 yearly basis or because of a material change in work with ionizing radiation. This may result in the DEPZ for either AWE site remaining the same, extending or reducing in size and geography over time. These will be kept under review.”*

It is noted that 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.

As set out in our previous representations, the potential for changes to the DEPZ is of major importance given the development potential of land currently located within the DEPZ, including for example land of strategic importance at Grazeley. We would therefore strongly support the need to maintain ongoing review throughout the plan period, as referred to at supporting paragraph 4.61. 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.

On the basis of the above, the following changes are thereby recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:

- *During the plan period there may be changes in the inputs to the ONR’s process which may result in consequential changes to the consultation zones or criteria. These will be kept under review. During the plan period there may also be changes to the DEPZ as a result of the requirement under REPPiR legislation to undertake formal reviews of the DEPZ at least on a 3 yearly basis or because of a material change in work with ionizing radiation . This may result in the DEPZ for either AWE site remaining the same, extending or reducing in size and geography over time. These will be kept under review. **Should there be a significant redrawing of the boundary of the DEPZ during the Plan period a full review of the Local Plan will be undertaken.**”*

## Chapter 5: Our Environment & Surroundings

### Policy SP10 Green Infrastructure

Draft LPR Policy SP10 requires development proposals to protect and enhance green infrastructure across the

District. It is noted that supporting paragraph 5.63 has been updated to include reference to the NPPF definition of green infrastructure and supporting paragraph 5.64 sets out *'examples of GI assets'*.

However, further clarification is required to specify land which is GI and subject to this policy. This is based on the Estate's experience where the relevant Core Strategy policy (Policy CS18) relating to GI has previously been misapplied to restrict development in rural areas. The NPPF glossary defines GI as land which can provide *'a wide range of environmental, economic, health and wellbeing benefits...for local and wider communities'* and therefore it is clear that such land must be publicly accessible. As such, it should be made clear that GI excludes for example open countryside, agricultural land and garden land, in line with the NPPF.

On the basis of the above, Policy SP10 and the supporting text as currently worded does not meet the tests of soundness set out in NPPF paragraph 35. The following changes are thereby recommended in order to ensure the soundness of the Plan:

- Supporting paragraphs 5.63-5.64 should be updated to state that *'GI assets exclude open countryside, agricultural land and garden land.'*

## **Chapter 6: Delivering Housing**

### Policy SP12 Approach to Housing Delivery

Draft Policy SP12 sets out provision for 8,721 to 9,146 net additional homes over the Plan period, comprising 513 to 538 dwellings per annum (dpa).

Importantly, Paragraph 61 of the NPPF states that the standard method for calculating housing need should be used to *'inform'* the *'minimum number of homes needed'*. It is noted however that the provision for 513-538dpa is based directly on the minimum Local Housing Need plus minimum 5% buffer required by NPPF paragraph 74.

As set out in the AMR (Table 3.4), the Core Strategy housing requirement of 525 dwellings per annum has not been met in 7 of the previous 13 years and therefore there is currently a shortfall of 310 dwellings against the Core Strategy requirement. The Housing Needs Assessment Update (July 2022) also confirms that there is a pressing need for affordable housing in the District. In addition, Reading Borough Council has also identified a shortfall of 230 dwellings which has been agreed to be met within West Berkshire (as referred at LPR paragraph 6.7), and which is likely to increase further given that the standard method now applies a 35% uplift to the 20 largest urban centres including Reading.

It is noted also that paragraph 2.27 of the Housing Background Paper explains officer's view that *'a higher number than the current Local Housing Need (LHN) in West Berkshire should be planned for'* and paragraph 2.36 adds that *'The Council would plan to meet the upper end of the range in an effort to boost supply and ensure there is built in flexibility'*. The accompanying Sustainability Appraisal (November 2022) (Appendix 4) also concludes that the option of planning for the LHN + 10% (option 2a) would provide some significantly positive effects and notably more positive effects than compared with the other options of planning for the LHN (option 1) or the LHN + 5% (option 2b).

In this context, given recent under-delivery and the unmet and increasing needs of Reading, it is recommended that the housing target is increased to include additional provision above the minimum LHN plus 5% requirement to include sufficient flexibility and ensure that local needs are met, as well as meeting the objectives of national policy to meet the housing needs of present and future generations (paragraph 8), and significantly boost the supply of new homes (paragraph 59)). It is also important that the housing target is not applied as a ceiling or cap to development, as set out in draft Policy SP12.

The LPR should be subject to ongoing monitoring, in accordance with the NPPF, in order to ensure that sufficient housing is being delivered based on the LPR target, and be flexible enough to respond to non-delivery

of identified sites or changing circumstances during the plan period, e.g. changes to the DEPZ.

#### Policies SP13 – SP15: Sites allocated for residential development in Newbury and Thatcham, Eastern Area and North Wessex Downs AONB

LPR paragraph 6.23 identifies a need for an additional 1,809 dwellings to 2039, taking into account existing commitments for 7,337 dwellings. Notably the existing commitments includes 1,580 dwellings at Sandleford Park, which was allocated in 2012 and has only recently been granted planning permission, and a large proportion (1,949 dwellings) at windfall sites which do not have planning permission, and so it is questionable whether all of the existing commitments will be delivered during the LPR plan period. It is therefore considered that an additional supply of housing is likely to be required in the LPR, above the stated requirement of 1,809 dwellings, which could be met through smaller sites distributed throughout the District to avoid similar delays to that experienced at Sandleford Park. It is important that the LPR identifies a sufficient supply of deliverable sites to meet the local housing target, taking into the previous shortfall in delivery and the potential that identified sites do not come forward as envisaged.

It is noted that draft LPR Policies SP13-SP15 make provision for 1,720 new dwellings (as referred to at paragraph 6.24), with 80 dwellings proposed to be allocated at neighbourhood plans (as referred to at paragraph 6.25), below the stated outstanding requirement for 1,809 dwellings. It is therefore crucial that additional housing sites are identified in order to meet the LPR housing target (with a need for more housing sites to be identified given the comments raised above regarding the existing commitments).

The NPPF also emphasises that small and medium sites *'can make an important contribution to meeting the housing requirements of an area, and are often built out relatively quickly'* (paragraph 68). Indeed the Estate's landholdings across the eastern part of the District include a number of small and medium land parcels (as noted further below) which are suitable to accommodate sustainable development and contribute to the District's housing land supply. This includes the Estate's land at Burghfield Common, Theale and Mortimer as noted further below. A number of these sites are currently located within the DEPZ, however should this change during the plan period (as noted above) and additional housing be required, these sites are well placed to accommodate this need.

On the basis of the above, Policy SP13-15 and the supporting text as currently worded do not meet the tests of soundness set out in NPPF paragraph 35. Accordingly, in order to ensure the soundness of the Plan, additional housing sites should be identified to ensure that local housing needs are met. This should include consideration of small and medium sites at Burghfield Common, Theale and Mortimer.

### **Chapter 7: Fostering Economic Growth & Supporting Local Communities**

#### Policy SP20: Strategic approach to employment land

It is noted that draft Policy SP20 has been updated to clarify that *'appropriate proposals for business development (offices, industrial, and storage and distribution) will be supported where they are located...On previously developed land within existing suitably located employment sites; or e. Within the countryside provided the proposal is in accordance with other relevant policies within the Plan, in particular Policy DM35.'*

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, as well as towards the District's overall employment needs set out in the Employment Land Review (Addendum 2022). This also follows the provision of paragraph 84 of the NPPF, which clearly states that planning policies should *'enable: the sustainable growth and expansion of all types of business in rural areas'*.

Given the District's overall employment needs and identified shortfall in provision, it is however also 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. As set out in our previous representations – at the Estate’s land at Green Park, Kirtons Farm Road (ref. BUR12), the western half of the site is situated within West Berkshire and the eastern half of the site is within Wokingham and is allocated for around 20,000sqm B Class uses as part of a ‘Major Development Location’ and ‘Core Employment Area’ designation (Wokingham Managing Development Delivery Local Plan (2014) Policy SAL07). There is no substantial natural boundary across the site which clearly defines the local authority boundaries. The NPPF (paragraphs 24 and 35) encourages effective strategic planning and therefore it is critical that the site is considered in its overall context across local authority boundaries and that Policy SP20 enables the appropriate development of the site.

Policy SP20 also continues to state that new office development outside of a town or district centre or Designated Employment Area will be required to satisfy the sequential test. The NPPF (paragraph 89) is clear however that the sequential test should not be applied to small-scale rural offices or other small-scale rural development. It is important that Policy SP20 is updated on this basis in order to ensure that suitable small-scale proposals can come forward to support the rural economy without unnecessary additional justification.

On the basis of the above, Policy SP20 as currently worded does not meet the tests of soundness set out in NPPF paragraph 35. Accordingly, the following changes are recommended in order to ensure the soundness of the Plan:

*‘Appropriate proposals for business development (offices, industrial, and storage and distribution) will be supported where they are located...’*

**‘On a suitable site adjacent to an existing employment site;...’**

*“Proposals for new office development that are not within a town or district centre as set out in Policy SP22 or within a DEA will be required to satisfy the sequential test. **Proposals for small scale rural offices will not be required to satisfy the sequential test.**”*

## **Chapter 9: Development Management Policies: Our Place Based Approach**

### **Policy DM1: Residential Development in the Countryside**

It is noted that draft LPR Policy DM1 has been amended to state that ‘exceptionally, new residential development outside of adopted settlement boundaries will be permitted’ instead of ‘there will be a presumption against new residential development...’ as set out in the previous Reg 18 draft LPR. This more positive approach is broadly welcomed in line with reflects NPPF paragraph 16, however it is recommended that ‘exceptionally’ is deleted on the basis of the criteria which are already set out and in order to ensure that appropriate rural development is not unduly prohibited.

As referred to above, the Council has also undertaken a review of settlement boundaries across the District, as set out in the Settlement Boundary Review Background Paper (December 2022) and summarised in the LPR Appendix 3, in order to inform where Policy DM1 is applied. Whilst the Settlement Boundary Review Background Paper (December 2022) includes reference to the consideration of Englefield, it is not clear that the conclusions are based on a detailed assessment or applying the identified criteria for reviewing settlement boundaries. As explained above and in our previous representations, it is 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).

Given the predominantly rural character of the District, it is crucial that adequate provision is made for development in the countryside in order to meet rural needs. This is reflected in paragraphs 78-79 of the NPPF which encourage sustainable development in rural areas to meet local needs and to enhance the vitality of rural



communities. The exceptions which are set out at parts a-i of draft Policy DM1 provide additional clarity to that of Policy C1 of the HSA DPD (which would be superseded by Policy DM1) and generally reflect the provisions of NPPF paragraph 80. It is however recommended that part e 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.

The amendment to draft Policy DC1 for all developments to 'contribute' rather than necessarily 'enhance' *the character of the rural area* is welcomed and will help to ensure that appropriate development will come forward to meet the needs of the rural area whilst continuing to protect its character.

On the basis of the above, the following changes are thereby recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:

~~'Exceptionally, a~~ *New residential development outside of adopted settlement boundaries will be permitted.'*

*"e. The conversion or re-use of redundant or disused buildings"*

## **Chapter 11: Development Management Policies: Delivering Housing**

### Policy DM15: First Homes Exception Sites and Policy DM16 Rural Exception Housing

The AMR 2022 (January 2023) (paragraph 1.14) notes that 'house prices in West Berkshire are high and the provision of affordable housing to meet local needs, particularly for young people and key workers, is one of the Council's priorities.' Accordingly, it is important that measures are taken to address this need. The general approach of draft LPR Policies DM15 and DM16, to support First Homes and rural exception housing adjacent to settlement boundaries, is therefore supported. This approach will also help to meet rural housing needs and enhance the vitality of rural communities in the District, in line with NPPF paragraph 79, and therefore it is important that a positive approach is taken to considering such schemes.

It is welcomed that draft LPR Policies DM15 and DM16 include some allowance for a proportion of enabling market housing on entry-level exception schemes where appropriate (in line with the Written Ministerial Statement on First Homes and NPPF paragraph 78) which will help to support appropriate schemes to come forward and benefit rural communities.

Draft LPR Policy DM16 and the supporting text set out the requirement for rural exception schemes to meet local housing needs, identified through a local needs survey. Whilst acceptable in theory, there may be additional ways in which local housing need can be demonstrated and the policy would benefit from setting out additional guidance on what evidence should support planning applications. Our experience to date is that the lack of clarity and consistency, as well as onerous expectations relating to housing needs surveys, has been a disincentive to landowners to release otherwise appropriate sites for this type of development.

### Policy DM24 Conversion and/or re-use of Existing Redundant or Disused Buildings in the Countryside to Residential Use

The overall approach of draft LPR Policy DM24 to supporting conversion of redundant or disused buildings in the countryside to residential use is supported. As above, it is 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.

Part b requires the applicant to prove that the building is genuinely redundant or disused and it is welcomed that paragraph 11.63 provides additional clarity to help this determination. In particular it is noted that the Council will consider whether the original use and purpose of the building exists and it is welcomed that 'the Council will take account of all the circumstances' together in making a judgement. The deletion of the need to satisfy 'all' of the criteria is also welcomed. This will help to enable a balanced judgement to be taken having

regard to the overall criteria and the economic, social and environmental benefits.

We are however 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. As noted above, the Estate's experience previously is that similar policies have been applied to prohibit development, and instead it is important that a positive approach is taken towards new development in the countryside in line with NPPF paragraphs 78-79.

On the basis of the above, the following changes are thereby recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:

*'The conversion or re-use of existing redundant or disused buildings in the countryside to residential use will be supported provided that the following criteria are satisfied...'*

~~**'c. Any internal and external changes do not harm the significance of a heritage asset in accordance with Policies SP9 and DM12;'**~~

~~**'d. The proposal respects and retains the character, fabric and distinctive features of the building and uses matching materials where those materials are an essential part of the character of the building and locality;'**~~

~~**'e. The site and location is suitable for residential use and gives a satisfactory level of amenity for occupants.'**~~

~~**'g. The existing vehicular access is suitable in landscape terms for the use proposed;'**~~

~~**'i. The impact on any protected species is assessed and appropriate avoidance and mitigation measures are implemented to ensure any protected species are not adversely affected.'**~~

#### Policy DM27 Sub-division of Existing Dwellings in the Countryside

Provision for the sub-division of existing dwellings in the countryside will help to further meet the needs of rural communities and boost the overall supply of housing. The introduction of draft LPR Policy DM27 is therefore welcomed. It will be important that a positive approach is taken to considering applications for such schemes in line with paragraphs 38, 78 and 79 of the NPPF.

### **Chapter 12: Development Management Policies: Fostering Economic Growth & Supporting Local Communities**

#### Policy DM32 Designated Employment Areas

Draft LPR Policy DM32 relates to Designated Employment Areas (DEAs) and states that proposals for employment uses will continue to be focused within DEAs. Whilst this is a logical and sustainable approach, it is important to ensure that this is balanced with supporting the needs of the rural economy as set out at draft LPR Policy DM35 and other existing employment sites. The NPPF sets out a positive approach towards supporting the rural economy and is clear that planning policies should enable *'the sustainable growth and expansion of all types of business in rural areas'* (paragraph 83). It is therefore important that the LPR does not restrict rural employment development in rural areas and that draft LPR Policies DM32 and DM35 are applied together.

#### Policy DM35 Sustaining a Prosperous Rural Economy

It is noted that draft LPR Policy DM35 has been amended to refer to 'sustaining' the rural economy rather than 'supporting' rural economy, which differs to the wording of the NPPF. 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 and the deletion of the need to

satisfy 'all' of the criteria and to justify that other existing buildings cannot be used is also welcomed. This will help to enable a balanced judgement to be taken having regard to the overall criteria and the economic, social and environmental benefits. However, the requirement for proposals to 'make a long-term contribution' to the rural economy is considered to be onerous and unjustified. Draft Policy DM35 also continues to include 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 currently worded has unnecessary repetition.

The NPPF is clear that planning policies should '*enable the sustainable growth and expansion of all types of business in rural areas*' (paragraph 84). It is important therefore that the LPR does not seek to restrict rural employment uses, but rather takes a positive approach which supports diversification and the vitality of rural settlements.

On the basis of the above, the following changes are thereby recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:

**'Sustaining a Prosperous Rural Economy Supporting the Rural Economy'**

*'a. The proposals demonstrate that the business can make a ~~long-term~~ contribution to the rural economy'*

~~*'1. It would not have a detrimental effect on the fabric, character and setting of historic buildings or other heritage assets'*~~

**Policy DM39 Local Community Facilities**

The NPPF is clear that planning policies '*should identify opportunities for villages to grow and thrive*' (paragraph 79) and should enable the development of accessible local services and community facilities such as local shops (paragraph 83d). The overall presumption in favour of local community facilities in draft LPR Policy DM39 therefore reflects the provisions of the NPPF and is supported.

**Development Opportunities**

In the context of the above, the Estate's landholdings within the District provide an opportunity for appropriate development to contribute towards the aims and objectives of the LPR.

**Englefield**

Englefield village comprises a sustainable rural community within the district with a range of local community services and facilities. The current local planning policies that apply to the village are restrictive of development and this is reflected in the amount of new development that the village has experienced in recent years. As such there is very little inward migration of new families to the village and, together with a lack of employment opportunities, the resultant trend is towards an ageing population. This threatens the medium to long term economic and social viability of the village and its community, in particular the survival of core services. It is however considered that, together with updates to draft LPR policies above, opportunities exist within the 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.

**Green Park**

As referred to above, the Estate's landholdings at Green Park (ref. BUR12) include land across the boundary of West Berkshire and Wokingham, with the eastern half of the site within Wokingham allocated for employment use as part of a 'Major Development Location' and 'Core Employment Area' designation (Wokingham Managing Development Delivery Local Plan (2014) Policy SAL07). Given the NPPF (paragraphs 24 and 35) encourages

strategic planning across local authority boundaries, and as there is no substantial natural boundary across the site, the western half of the site within West Berkshire provides a strong opportunity to accommodate additional employment use to support both West Berkshire and Wokingham's needs.

#### Bradfield Southend

The Estate's landholdings at Cock Lane, Bradfield Southern (ref. BRAD4) is situated within the existing settlement boundary of Bradfield Southend, and is less than 5 minutes' walk from all the services and facilities within the village (including educational, retail and community facilities). The site is located within the North Wessex Downs AONB, which washes over the entirety of the settlement, however in all other respects, the site is not constrained environmentally. The site is therefore situated in a sustainable location could accommodate in the region of 4-5 dwellings to meet local needs.

#### Burghfield Common

The Estate's landholdings at Burghfield Common include land adjacent to Pondhouse Farm (ref. BUR10) and land at Hollybush Lane, Burghfield Common (ref. SUR3). Taking into account the role of Burghfield Common within the District, and given that the DEPZ may be subject to change (as noted above), it is recommended that some provision is made for additional housing at Burghfield in order to ensure certainty of future housing supply.

The site adjacent to Pondhouse Farm (ref. BUR10) adjoins the eastern edge of Burghfield Common and is within walking distance of all the services and facilities within the village (including educational, retail and community facilities). The site is currently in agricultural use and is not constrained environmentally e.g. by ecological or landscape designations, or by flood risk considerations. The site is therefore situated in a sustainable location to accommodate development in the region of 100-140 dwellings.

The site at Hollybush Lane (ref. SUR3) adjoins the northern edge of the Burghfield Common settlement boundary. The site is a c10 minute walk to educational, retail and community facilities and 1 mile away from the village centre. The site is recognised as having opportunities for biodiversity enhancements through its designation as a 'Biodiversity Opportunity Area', however in all other respects, the site is not constrained environmentally e.g. by landscape designations or flood risk considerations. The site, or part thereof, is therefore situated in a sustainable location to accommodate development.

#### Mortimer

In addition to land at West End Road (ref. SM2) and The Street (ref. SM3) (promoted by others), the Estate has landholdings at Spring Lane (ref. SM4) and Monkton Copse, Mortimer (ref. SM5). As explained further above, 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).

#### **Conclusion**

We trust that the comments herein provide a useful contribution to inform the ongoing preparation of the LPR as it progresses through Examination.

We wish to continue to contribute towards the LPR process and therefore would be grateful if the Council could advise of further opportunities for participation at the Examination in Public.

Please do not hesitate to contact me if you have any questions regarding these representations or require any further information.



Yours sincerely



**Jonathan Sebbage BSc (Hons) MSc MRTPI  
Associate**

Enc. Completed representation forms



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

**Ref:**

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<b>Return by:</b>	<b>4:30pm on Friday 3 March 2023</b>

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	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		Mr
First Name:*		Jonathan
Last Name:*		Sebbage
Job title (where relevant):		Associate Planner
Organisation (where relevant):		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
Email address:*		████████████████████
Telephone number:		████████████████████

\*Mandatory field

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
---	--------------------

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

Section/paragraph:	
Policy:	SP1
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter



#### 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.

The following changes are recommended in order to ensure the soundness of the Plan:

“...Theale, **Burghfield Common and Mortimer** will be a focus for additional housing **including** through existing commitments and new allocations.

The area will continue to be important for business development ~~with~~ **through** the retention of DEAs **and existing employment sites and through proposals to strengthen and diversify the rural economy ...”.**

Please see covering letter for further details.

#### 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:

The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

#### 6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

Signature	Jonathan Sebbage	Date	03/03/2023
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	<b>Your details</b>	<b>Agent's details (if applicable)</b>
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First Name:*		Jonathan
Last Name:*		Sebbage
Job title <i>(where relevant):</i>		Associate Planner
Organisation <i>(where relevant):</i>		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
Email address:*		[REDACTED]
Telephone number:		[REDACTED]

\*Mandatory field

## Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
---	--------------------

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

Section/paragraph:	
Policy:	SP2
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:*

*Please see covering letter*

## 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)

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<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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.*

*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. A positive approach should be taken to considering development proposals which are commensurate in scale and extent in the AONB which reflects guidance set out in paragraphs 78 and 172 of the NPPF.*

*Please see covering letter for further details.*

#### 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:*

*The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.*

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*Tick*

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<b>Signature</b>	<i>Jonathan Sebbage</i>	<b>Date</b>	<b>03/03/2023</b>
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Last Name:*		Sebbage
Job title <i>(where relevant):</i>		Associate Planner
Organisation <i>(where relevant):</i>		Savills
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Your name or organisation (and client if you are an agent):	Savills UK - Agent
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	SP3
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

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The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

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NPPF criteria	Yes	No
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<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter



#### 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).

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Policy SP3 as currently worded, based on the supporting evidence, does not meet the tests of soundness set out in NPPF paragraph 35. The following changes are thereby recommended in order to ensure the soundness of the Plan:

- Policy SP3 should be informed by an updated Settlement Hierarchy Review to include consideration of other smaller settlements beyond those currently identified in the Core Strategy and HSA DPD;
- Policy SP3 should be used to inform the proposed spatial strategy set out in Policy SP1 to include Theale, Burghfield Common and Mortimer as the focus for development in the Eastern Area;
- Policy SP3 should be informed by an updated Settlement Boundary Review to include full assessment of Englefield based on the assessment criteria; and
- Parts h to j of Policy SP3 should be amended as follows:
  - “h. Infill or changes of use **or other minor development** within the settlement boundary;
  - i. Non-strategic sites allocated for housing and economic development through other policies in this Plan the LPR or neighbourhood plans; and
  - j. Rural exceptions affordable housing schemes; **and**
  - **k. First Homes exception schemes.**”

Please see covering letter for further details.

#### 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:

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Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	X
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Email address:*		████████████████████
Telephone number:		████████████████████

\*Mandatory field

## Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
---	--------------------

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

Section/paragraph:	
Policy:	SP4
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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.

The following changes are thereby recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:

- During the plan period there may be changes in the inputs to the ONR's process which may result in consequential changes to the consultation zones or criteria. These will be kept under review. During the plan period there may also be changes to the DEPZ as a result of the requirement under REPPiR legislation to undertake formal reviews of the DEPZ at least on a 3 yearly basis or because of a material change in work with ionizing radiation . This may result in the DEPZ for either AWE site remaining the same, extending or reducing in size and geography over time. These will be kept under review. **Should there be a significant redrawing of the boundary of the DEPZ during the Plan period a full review of the Local Plan will be undertaken.**

Please see covering letter for further details.

#### 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:

The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

#### 6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.

<b>Signature</b>	<i>Jonathan Sebbage</i>	<b>Date</b>	<b>03/03/2023</b>
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**


**West Berkshire Local Plan Review 2022-2039**
**Proposed Submission Representation Form**
**Ref:**
*(For official use only)*

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	<b>By email:</b> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
	<b>By post:</b> Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>4:30pm on Friday 3 March 2023</b>

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- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**PART A: Your Details**

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	Your details	Agent's details (if applicable)
Title:		Mr
First Name:*		Jonathan
Last Name:*		Sebbage
Job title (where relevant):		Associate Planner
Organisation (where relevant):		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
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.***

Your name or organisation (and client if you are an agent):	Savills UK - Agent
---	--------------------

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

Section/paragraph:	
Policy:	SP10
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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.*

*Policy SP10 and the supporting text as currently worded does not meet the tests of soundness set out in NPPF paragraph 35. The following changes are thereby recommended in order to ensure the soundness of the Plan:*

- *Supporting paragraphs 5.63-5.64 should be updated to state that 'GI assets exclude open countryside, agricultural land and garden land.*

*Please see covering letter for further details.*

#### 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:*

*The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.*

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#### 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*

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

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<b>Signature</b>	<i>Jonathan Sebbage</i>	<b>Date</b>	<b>03/03/2023</b>
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	<b>By email:</b> <a href="mailto:planningpolicy@westberks.gov.uk">planningpolicy@westberks.gov.uk</a>
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	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		Mr
First Name:*		Jonathan
Last Name:*		Sebbage
Job title <i>(where relevant):</i>		Associate Planner
Organisation <i>(where relevant):</i>		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
Email address:*		████████████████████
Telephone number:		████████████████████

\*Mandatory field

**Part B – Your Representation*****Please use a separate sheet for each representation***

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
---	--------------------

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

Section/paragraph:	
Policy:	SP12
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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).**

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*Please see covering letter*

#### 5. Independent Examination

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

Yes

No

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

*The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.*

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#### 6. Notification of Progress of the Local Plan Review

**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

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<b>Signature</b>	<i>Jonathan Sebbage</i>	<b>Date</b>	<b>03/03/2023</b>
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	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		Mr
First Name:*		Jonathan
Last Name:*		Sebbage
Job title (where relevant):		Associate Planner
Organisation (where relevant):		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
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.***

Your name or organisation (and client if you are an agent):	Savills UK - Agent
---	--------------------

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

Section/paragraph:	
Policy:	SP13-15
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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.*

*Policy SP13-15 and the supporting text as currently worded do not meet the tests of soundness set out in NPPF paragraph 35. Accordingly, in order to ensure the soundness of the Plan, additional housing sites should be identified to ensure that local housing needs are met. This should include consideration of small and medium sites at Burghfield Common, Theale and Mortimer.*

*Please see covering letter for further details.*

#### 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:*

*The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.*

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**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

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	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		Mr
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Job title (where relevant):		Associate Planner
Organisation (where relevant):		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
Email address:*		████████████████████
Telephone number:		████████████████████

\*Mandatory field

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	SP20
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
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<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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.

Policy SP20 as currently worded does not meet the tests of soundness set out in NPPF paragraph 35. Accordingly, the following changes are recommended in order to ensure the soundness of the Plan:

*'Appropriate proposals for business development (offices, industrial, and storage and distribution) will be supported where they are located...'*

**'On a suitable site adjacent to an existing employment site:...'**

*"Proposals for new office development that are not within a town or district centre as set out in Policy SP22 or within a DEA will be required to satisfy the sequential test. **Proposals for small scale rural offices will not be required to satisfy the sequential test.**"*

Please see covering letter for further details.

#### 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:

*The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.*

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Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

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The publication of the report of the Inspector appointed to carry out the examination	X
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	<b>By post:</b> Planning Policy, Development and Regulation, Council Offices, Market Street, Newbury, RG14 5LD
<b>Return by:</b>	<b>4:30pm on Friday 3 March 2023</b>

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**PART A: Your Details**

*Please note the following:*

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	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		Mr
First Name:*		Jonathan
Last Name:*		Sebbage
Job title (where relevant):		Associate Planner
Organisation (where relevant):		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
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.***

Your name or organisation (and client if you are an agent):	Savills UK - Agent
---	--------------------

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

Section/paragraph:	
Policy:	DM1
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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.*

The following changes are recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:

*'~~Exceptionally, n~~ New residential development outside of adopted settlement boundaries will be permitted.'*

*"e. The conversion **or re-use** of redundant or disused buildings"*

*Please see covering letter for further details.*

#### 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:*

*The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.*

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#### 6. Notification of Progress of the Local Plan Review

**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

*Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.*

<b>Signature</b>	<i>Jonathan Sebbage</i>	<b>Date</b>	<b>03/03/2023</b>
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**West Berkshire Local Plan Review 2022-2039**  
**Proposed Submission Representation Form**

**Ref:**

*(For official use only)*

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## Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	DM15 and DM16
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	X	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence	X	
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground	X	
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF	X	

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter



#### 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).**

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*Please see covering letter*

#### 5. Independent Examination

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

Yes

No

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

*The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.*

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**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

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

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<b>Signature</b>	<i>Jonathan Sebbage</i>	<b>Date</b>	<b>03/03/2023</b>
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**Proposed Submission Representation Form**

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Title:		Mr
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Last Name:*		Sebbage
Job title (where relevant):		Associate Planner
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Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
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**Part B – Your Representation*****Please use a separate sheet for each representation***

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	DM24
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
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Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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.

The following changes are recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:

*'The conversion **or re-use** of existing redundant or disused buildings in the countryside to residential use will be supported provided that the following criteria are satisfied...'*

~~*'c. Any internal and external changes do not harm the significance of a heritage asset in accordance with Policies SP9 and DM12;'*~~

~~*'d. The proposal respects **and retains** the character, fabric and distinctive features of the building and uses matching materials where those materials are an essential part of the character of the building and locality;'*~~

~~*'e. The site and location is suitable for residential use **and gives a satisfactory level of amenity for occupants;'***~~

~~*'g. The existing vehicular access is suitable in landscape terms for the use proposed;'*~~

~~*'i. The impact on any protected species is assessed and appropriate avoidance and mitigation measures are implemented to ensure any protected species are not adversely affected.'*~~

Please see covering letter for further details.

#### 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:

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#### 6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

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Title:		Mr
First Name:*		Jonathan
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Job title <i>(where relevant):</i>		Associate Planner
Organisation <i>(where relevant):</i>		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
Email address:*		████████████████████
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**Part B – Your Representation*****Please use a separate sheet for each representation***

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	DM27
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:*

*Please see covering letter*



## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development	X	
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Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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.*

Provision for the sub-division of existing dwellings in the countryside will help to further meet the needs of rural communities and boost the overall supply of housing. The introduction of draft LPR Policy DC26 is therefore welcomed. It will be important that a positive approach is taken to considering applications for such schemes in line with paragraphs 38, 78 and 79 of the NPPF.

#### 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:*

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Title:		Mr
First Name:*		Jonathan
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Job title <i>(where relevant):</i>		Associate Planner
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Email address:*		████████████████████
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## Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	DM32
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:*

*Please see covering letter*

## 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)

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NPPF criteria	Yes	No
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#### 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.*

Draft LPR Policy DM32 states that proposals for employment uses will continue to be focused within DEAs. Whilst this is a logical and sustainable approach, it is important to ensure that this is balanced with supporting the needs of the rural economy as set out at draft LPR Policy DM35 and other existing employment sites. The NPPF sets out a positive approach towards supporting the rural economy and is clear that planning policies should enable 'the sustainable growth and expansion of all types of business in rural areas' (paragraph 83). It is therefore important that the LPR does not restrict rural employment development in rural areas and that draft LPR Policies DM32 and DM35 are applied together

#### 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:*

*The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.*

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

#### 6. Notification of Progress of the Local Plan Review

**Do you wish to be notified of any of the following?**

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	X
The publication of the report of the Inspector appointed to carry out the examination	X
The adoption of the Local Plan Review	X

*Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.*

<b>Signature</b>	<i>Jonathan Sebbage</i>	<b>Date</b>	<b>03/03/2023</b>
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**



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

**Ref:**

*(For official use only)*

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

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**PART A: Your Details**

*Please note the following:*

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		Mr
First Name:*		Jonathan
Last Name:*		Sebbage
Job title (where relevant):		Associate Planner
Organisation (where relevant):		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
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.***

Your name or organisation (and client if you are an agent):	Savills UK - Agent
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	DM35
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:*

*Please see covering letter*



## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see covering letter

## 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

Please see covering letter

#### 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.

The following changes are recommended in order to ensure the soundness of the Plan in line with NPPF paragraph 35:

**~~‘Sustaining a Prosperous Rural Economy Supporting the Rural Economy’~~**

*‘a. The proposals demonstrate that the business can make a ~~long term~~ contribution to the rural economy’*

**~~‘1. It would not have a detrimental effect on the fabric, character and setting of historic buildings or other heritage assets’~~**

Please see covering letter for further details.

#### 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:

*The Englefield Estate consider that the plan in its current version is not sound and would like the opportunity to set out how alterations could be made to the plan and its evidence base to enable it to be found sound and progress to adoption. Full details are provided in the accompanying letter.*

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<b>Signature</b>	<i>Jonathan Sebbage</i>	<b>Date</b>	<b>03/03/2023</b>
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	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		Mr
First Name:*		Jonathan
Last Name:*		Sebbage
Job title <i>(where relevant):</i>		Associate Planner
Organisation <i>(where relevant):</i>		Savills
Address* <i>Please include postcode:</i>		Hawker House, Napier Court, 5-6 Napier Rd, Reading RG1 8BW
Email address:*		████████████████████
Telephone number:		████████████████████

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## Part B – Your Representation

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Your name or organisation (and client if you are an agent):	Savills UK - Agent
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	DM39
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:*

*Please see covering letter*

## 2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

### Do you consider the Local Plan Review is sound?

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The NPPF is clear that planning policies ‘should identify opportunities for villages to grow and thrive’ (paragraph 79) and should enable the development of accessible local services and community facilities such as local shops (paragraph 83d). The overall presumption in favour of local community facilities in draft LPR Policy DM39 therefore reflects the provisions of the NPPF and is supported.

#### 5. Independent Examination

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