


**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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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>

	Your details	Agent's details (if applicable)
Title:	Mr	
First Name:*	Guy	
Last Name:*	Robinson	
Job title <i>(where relevant):</i>	Historic Environment Planning Adviser	
Organisation <i>(where relevant):</i>	Historic England	
Address* <i>Please include postcode:</i>	Historic England 4th Floor Cannon Bridge House 25 Dowgate Hill London EC4R 2YA	
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):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Para 5.57
Policy:	SP9: Historic environment
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

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

We have concerns about the soundness of policy SP9 on the historic environment.

We assert that "enabling development" should not appear in the Local Plan, in policy or supporting text (para. 5.57), because it deals with circumstances when a proposal for development conflicts with planning policies. If criteria on enabling development were included, a proposal could align with planning policies, thereby no longer representing enabling development. We recommend deleting the Plan's text on enabling development, or risk being unsound due to conflict with national policy (paragraph 208 of the NPPF).

Also, there is a missing "and" in policy SP9, which should be added or risk the policy being unsound and, again, in conflict with national policy (paragraph 201).

Finally, on policy SP9, as the Council knows, we expressed concern in our response to the Council's Regulation 18 consultation in 2021 that it had only 2 Conservation Area Appraisals (CAAs) for the plan area's 53 conservation areas (CAs). We welcome the Council outlining a programme for CA Appraisals and Management Plans (CAAMPs) in its Local Plan, in paragraph 10.81; but we are very concerned by the resourcing that accompanies this, and the progress made since we highlighted our concerns. Additionally, this matter connects with policy DM9 on conservation areas and has the potential to undermine implementation of policy DM9. To be clear, when read in isolation, we do not regard policy DM9's wording as unsound. However, the Council's commitment to CAAs/CAAMPs needs to be strengthened, which we believe could most effectively be done via policy SP9.



While significant detail on preparing CAAs/CAAMPs is beyond the plan's scope, we propose two steps that the Council could take in its Local Plan which would help to address our concerns (in so far as the Local Plan can influence this matter):

- i. Currently the Council's programme for CAAs/CAAMPs is outlined in the section on Development Management, as text supporting policy DM9 on Conservation Areas. We recommend moving this (specifically paragraph 10.81) to support policy SP9, as this is a strategic issue about the Council's strategic approach to conservation areas, rather than a development management issue;
- ii. Also, we advise including additional text in policy SP9 that relates to this programme, underlines the Council's commitment to action and supports the implementation of policy DM9. We propose wording for consideration below.

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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

#### Relevant excerpts from policy SP9

Positive action will be taken to ensure that opportunities for the conservation and enjoyment of the historic environment are maximised. For example, this will include, but not be limited to:

- a) producing and adopting conservation area appraisals and management plans;
- b) maintaining a local list of non-designated heritage assets; and
- c) maintaining a list of local heritage assets which are at risk, but which do not meet the criteria for inclusion on the national Heritage at Risk Register.



The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will also be sustained and enhanced through new development, including promoting heritage-led regeneration where appropriate and delivering public benefits from the District's archaeological resources.

j. No viable use of the asset can be found in the medium term through appropriate marketing that will enable its conservation; and

~~Development proposals for enabling development which would otherwise conflict with other policies in the Local Plan but which would secure the future conservation of a heritage asset will be permitted where:~~

- ~~i. the proposals will not materially harm the heritage value of the asset or its setting;~~
- ~~ii. it can be demonstrated that alternative solutions have failed;~~
- ~~iii. the proposed development is the minimum necessary to protect the significance of the heritage asset;~~
- ~~iv. it meets the tests and criteria set out in Historic England guidance GPA4: Enabling Development and Heritage Assets;~~
- ~~v. it is subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development; and~~
- ~~vi. it enables public appreciation of the saved heritage asset.~~

Supporting text

~~5.57 The long term conservation of a small minority of heritage assets can sometimes present particular problems. Enabling development is a planning mechanism which, in extreme cases, permits a departure from planning policies in order to enable the conservation of a relevant heritage asset in cases where the future of that asset would not otherwise be secured. Where planning applications propose enabling development, the Council will use the detailed and rigorous tests set out by Historic England in order to determine whether planning permission would be appropriate.~~

**5. Independent Examination**

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

Yes

No

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

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

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


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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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## 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.

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

Section/paragraph:	
Policy:	RSA2: Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)
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:*

<p>As the Council will know, it has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.</p>
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## 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:

As a result of the lack of Conservation Area Appraisal and insufficient heritage assessment, currently we regard RSA2 as unsound because it is not based on proportionate evidence as required by paragraph 35 of the NPPF. We advise that proportionate heritage assessment is done on RSA2 at this stage to inform this allocation.

Though this site is carried forward from the adopted site allocations development plan document and at the time of writing a development proposal has been submitted for determination (23/00310), the site's proximity to the conservation area does not appear to be mentioned in the Sustainability Appraisal. In principle we advise more detailed assessment to inform the allocation, given its proximity to the conservation area.

Paragraph 206 of the NPPF local planning authorities to look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance.

We envisage particular sensitivities in the south west corner of the site, with the potential to impact on the rural character of the western approach to the conservation area.

Also, there is the opportunity for any scheme to respond positively to the local context i.e. the character of the conservation area to influence the character of the development in a positive way. For this to be realised, further evidence is needed on the relationship between this site and the conservation area.

We note and support the proposed criterion: “Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.

We note and support the proposed criterion: “Development will protect and enhance the special architectural and historic interest of the Speen Conservation Area”. We encourage the preparation of a Conservation Area Appraisal as a priority to support effective decision-making and implementation of this policy.

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

*Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.*

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

#### Evidence base

More detailed heritage assessment to inform the allocation, which may result in amendments to the policy.

### 5. Independent Examination

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

Yes  No

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

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

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

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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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**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.

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

Section/paragraph:	
Policy:	RSA17: Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)
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:*

As the Council will know, it has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.

## 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:

As a result of the lack of Conservation Area Appraisal and insufficient heritage assessment, currently we regard RSA17 as unsound because it is not based on proportionate evidence as required by paragraph 35 of the NPPF. We advise that proportionate heritage assessment is done on RSA17 at this stage to inform this allocation.

We note the proposed criterion: "The development design and layout will be further informed by a Heritage Impact Assessment;" Leaving aside the redundancy of the word "further", we assert that the evidence base for this allocation is currently insufficient.

Chieveley conservation area does not currently have a conservation area appraisal. We advised in our letter of 5 February 2021 that a conservation area appraisal is needed as part of the plan-making process (i.e. prior to allocation), to inform development on this site. Our letter of 5 Feb recommended as a minimum that heritage impact assessment (HIA) is needed to inform the allocation. HIA would enable further consideration of the relationship between the site and nearby heritage assets, inform the approach to hedgerows (identified in the HELAA site assessment) and check some of the details in the HELAA, which states that Tudor Cottage and Coombe House are listed.

The Sustainability Appraisal in Appendix 8b also notes that "The site is likely to have a negative impact on heritage assets as the site is adjacent to the conservation area with a number of listed buildings" and that "Survey work would be required and mitigation measures may be required."

Also, we note the HELAA site assessment recommends that some archaeological work to be undertaken, but this is not included in the criteria. We suggest it is added.

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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Evidence base

More detailed heritage assessment to inform the allocation, which may result in amendments to the policy

Policy RSA17

Proposed additional text:

The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site



### 5. Independent Examination

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

Yes

No

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

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

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

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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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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Your name or organisation (and client if you are an agent):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	SP17: North East Thatcham
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

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

The opening to SP17 includes a commitment to masterplan the site and for the Thatcham Strategic Growth Study (TSGS) to provide guiding principles for the delivery of the site. As a connected point of detail, the final sentence of the first paragraph in policy SP17 does not currently make sense and needs to be revised.

We note that the scale of development in SP17 has been significantly reduced from what is set out in the TSGS. Even so, we recognise that the principles in the TSGS could still usefully contribute to future proposals. That said, the TSGS's contribution on the area's historic environment is limited, meaning its principles will have only limited resonance on heritage.

We note and support a proposed requirement in policy SP17 for a Historic Environment Strategy. However, we advise broadening its scope beyond the narrow treatment of listed buildings on the site. Linked with this it would be helpful to define the Historic Environment Strategy, also making clear that this needs to be informed by heritage impact assessment, which the Council's HELAA states is required for areas THA6 and THA14 and, one infers, THA10. A Historic Environment Strategy could support effective place-shaping and enhance local character across this allocation (including historic Dunston Park, Seige Cross and the land around Colthrop Manor), if it were to connect with all elements of the area's heritage.

We suggest revised wording below, which that responds also to the lack of reference to archaeological assessment in policy SP17, the need for which is included in the HELAA associated with different sites within SP17. We note that the TSGS stage 3 report states: "As one of the oldest continuously settled places in the country, archaeological remains are likely. The site displays varied potential for unearthing historic evidence. Scattered finds



indicate the presence of Palaeolithic and Mesolithic flint working, and the potential for Iron Age workings related to a site further up the slopes. Historic earthworks are visible on LIDAR scans in the north-western part of the site.”

We regard policy SP17 is unsound without suitable reference to archaeological assessment, which should also be agreed with the Council’s archaeological adviser.

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

*Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.*

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

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Historic Environment Strategy to demonstrate how the site’s historical development, archaeological remains, historic buildings, non-designated heritage assets and parkland will inform the scheme and help to create a sense of place. It should:

- i. be informed by proportionate heritage impact assessment, desk-based archaeological assessment and, if needed, field evaluation; and
- ii. articulate how the proposed scheme would support an appropriate future use of the Listed Buildings in the area and minimise harm to their significance (including demonstrating listed buildings in the area will be conserved and how the impact of the development on their settings has been considered).

### 5. Independent Examination

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Yes  No

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	<i>Tick</i>
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Your name or organisation (and client if you are an agent):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	<ul style="list-style-type: none"> <li>○ RSA1: Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)</li> <li>○ RSA2: Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)</li> <li>○ RSA5: Land at Lower Way, Thatcham (Site Ref: THA025)</li> <li>○ RSA10: Whitehart Meadow, Theale (Site Ref THE1)</li> <li>○ RSA11: Former Theale Sewage Treatment Works, Theale (Site Ref THE7)</li> <li>○ RSA12: Land adjoining Pondhouse Farm, Clayhill Road (Site Ref: HSA15)</li> <li>○ RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4)</li> <li>○ RSA14: Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)</li> <li>○ RSA15: Land at Newbury Road, Lambourn (Site Ref: HSA 20)</li> <li>○ RSA18: Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)</li> <li>○ RSA19: Land west of Spring Meadows, Great Shefford (Site Ref: GS1)</li> <li>○ RSA20: Land off Charlotte Close, Hermitage (Site Ref: HSA 24)</li> <li>○ RSA21: Land south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)</li> <li>○ ESA1: Land east of Colthrop Industrial Estate, Thatcham (Site Ref: MID5)</li> <li>○ ESA5: Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)</li> <li>○ ESA6 Policy ESA6 Land adjacent to Padworth IWFM, (Site Ref: PAD4)</li> </ul>

Appendix:	
Policies Map:	
Other:	

## 1. Legally Compliant

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Yes

No

Please give reasons for your answer:

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<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:

We note and support the proposed criterion in each of the policies listed in this representation that relates to desk-based archaeological assessment and, if needed, field evaluation.

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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

For all sites listed in this representation, while we support the policy requirement for desk-based archaeological assessment and, if necessary, field evaluation, the language used across the policies used is not consistent. The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness.

Linked with this matter:

- a) for ESA1, the phrasing implies that field evaluation will definitely be required; is that the case?
- b) for ESA6, wording changes are needed to ensure the criterion is clear i.e. is the DBA required and then field evaluation, if necessary. We suspect this is simply a typo, so hopefully an easy fix.

### 5. Independent Examination

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

Yes

No



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

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

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

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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**

## 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):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	<input type="radio"/> RSA21: Land south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

### 2. Soundness

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

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

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

*Please tick all that apply:*

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

The allocation for RSA21 does not mention Barnaby Thatch (GII) to the north. Proposals need to take account of this designated heritage asset and ensure that they avoid or minimise harm to its significance.

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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We advise adding the following criterion to the policy: Protect the setting of the nearby Listed Building (Barnaby Thatch)

### 5. Independent Examination

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

Yes

No

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

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

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


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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**

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

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

Section/paragraph:	
Policy:	RSA22: Land adjacent Station Road, Hermitage.
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

--

**2. Soundness**

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

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

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

*Please tick all that apply:*



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

We note the proposed criterion: “A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets.” This statement does not fully align with the HELAA site assessment.

Assessment should also consider the site’s relationship with a nearby a Scheduled Monument (Grimsbury Castle) – a point that is not mentioned in the Sustainability Appraisal for the site. As a result, the wording of this requirement for heritage impact assessment will need to be amended, in discussion with the Council’s heritage advisers. We suggest revised wording for consideration.

Furthermore, we are unclear on the rationale for not undertaking a DBA and if needed field evaluation on this site, given the ridge and furrow system identified on the HER. To align with the NPPF, wording needs to be added on a requirement for archaeological assessment.

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

*Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.*

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets and the nearby Scheduled Monument (Grimsbury Castle)

The development will be informed by a desk-based archaeological assessment followed by field evaluation if necessary;

### 5. Independent Examination

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

Yes  No

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

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

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

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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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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):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Para 3.4, part of the Plan's vision
Policy:	
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

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**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:*

We welcome reference to conserving and enhancing heritage assets. Note that the built environment is not synonymous with the historic environment. Therefore, we suggest addition of the word “historic” in the final sentence of this paragraph.

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

*Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.*

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

Yes

No

*Please give reasons for your answer:*



#### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Heritage assets will be conserved and enhanced and there will be greater opportunity for enjoyment and appreciation of the special qualities of the built, historic and natural environment.

#### 5. Independent Examination

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

Yes

No

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

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

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

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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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## Part B – Your Representation

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

Section/paragraph:	Objective 7, page 11
Policy:	
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes  No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

NPPF criteria	Yes	No
<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:

The heading of objective 7 is "Heritage" whereas the text refers to the built, historic and natural environment. We acknowledge the links between built, historic and natural assets and do not object to this wording; but we'd be happy to discuss this further as appropriate, if the Council wish to amend this in response to consultation feedback.

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

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

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

Yes

No

Please give reasons for your answer:

#### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

#### 5. Independent Examination

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

Yes  No

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

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

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


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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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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):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Para 4.6 and Figure 1
Policy:	
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

NPPF criteria	Yes	No
<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:

Reference should be made to Registered Parks and Gardens, for accuracy and consistency with the Policies Map. Figure 1 (or perhaps the Policies map?) should also include Scheduled Monuments.

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

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

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

Yes

No

Please give reasons for your answer:



#### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

In addition, there are other designations including conservation areas and Registered historic parks and gardens...

#### 5. Independent Examination

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

Yes  No

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

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

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

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

Please tick all that apply:

Tick

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

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

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

## 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):	Historic England
---	------------------

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

Section/paragraph:	
Policy:	Policy SP1: Spatial strategy
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes  No

*Please give reasons for your answer:*

### 2. Soundness

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

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

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

*Please tick all that apply:*

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

The following sentence could be interpreted in more than one way: “The District’s historic environment and environmental assets will continue to be protected and enhanced and used positively in development to establish a distinctive sense of place that nurtures human health and wellbeing.”

We infer it is intended to cover the District’s historic environment and all environmental assets, including include both heritage and natural assets. However, if it is intended to focus only on its historic environment and heritage assets, a minor wording change is needed.

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

*Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.*

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

**5. Independent Examination**

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

Yes

No

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

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

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


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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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## Part B – Your Representation

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

Section/paragraph:	
Policy:	Policy SP2: North Wessex Downs AONB
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes  No

*Please give reasons for your answer:*

### 2. Soundness

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

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

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

*Please tick all that apply:*



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

We support the proposed policy, including taking account of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. We note this is supported by paragraph 4.28.

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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**5. Independent Examination**

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

Yes  No

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

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

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


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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**

## 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):	Historic England
---	------------------

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

Section/paragraph:	
Policy:	Policy SP5: Responding to Climate Change
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

### 2. Soundness

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

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

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

Please tick all that apply:

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

While we broadly support the proposed policy, including the intention we infer underlies criterion m, there are ways other than reversibility and minimum intervention that could enable improved environmental performance. So, the criterion as worded could be unintentionally constraining. We suggest simplifying the criterion as shown.

Further work the Council may decide to undertake on measures that could enable the District to reach its net zero ambitions could reveal other principles that the Council may find useful. We advise also referring to a 'whole building approach' as stated in paras 5.55 and 10.92 of the submission plan.

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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



Depending on the nature and scale of proposals, development will be expected to satisfy the following criteria:

m. To maintain the integrity of the historic environment and to respect the character and improve the environmental performance of heritage assets without compromising their significance, ~~by adopting principles of reversibility and minimum intervention~~ in accordance with Policy SP9. This necessitates taking a whole building approach and use of appropriate materials."

### 5. Independent Examination

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

Yes  No

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

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

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


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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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Your name or organisation (and client if you are an agent):	Historic England
---	------------------

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

Section/paragraph:	
Policy:	Policy SP7: Design Quality
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes  No

*Please give reasons for your answer:*

### 2. Soundness

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

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

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

*Please tick all that apply:*

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

We note and do not object to the changes to this policy since Reg 18.

However, we suggest the Council considers referring to design guides or codes, notwithstanding the possibility that “community planning documents” may include such guides or codes.

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

*Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.*

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021), or as superseded, and at a local level, this includes neighbourhood plans, design guides or codes and relevant community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.

## 5. Independent Examination

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

Yes

No

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

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

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


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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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Your name or organisation (and client if you are an agent):	Historic England
---	------------------

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

Section/paragraph:	
Policy:	SP8: Landscape character DM10: Listed Buildings DM11: Non-designated Heritage Assets DM12: Registered Parks and Gardens DM13: Registered Battlefields DM14: Assets of archaeological importance
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

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

We support the proposed policies listed in this representation

There is a minor typo in policy DM10 – an "is" is not needed

Also, there is a minor formatting issue, with paragraph 10.100 being indented further than others.

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

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

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

Yes

No

Please give reasons for your answer:

## 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).



*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

unless justified to the satisfaction of the Council, that the proposed changes, loss or irreversible damage, and/or addition of new features to the Listed Building and its setting are:

- Less than substantial in terms of impact/harm on the character and significance of the Listed Building and its setting; and
- Is off-set by the public benefit from making the changes, including enabling optimal viable use, and net enhancement to the Listed Building and its setting.

### 5. Independent Examination

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

Yes

No

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

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

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


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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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Your name or organisation (and client if you are an agent):	Historic England
---	------------------

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

Section/paragraph:	Para 5.45
Policy:	
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

**2. Soundness**

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

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

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

*Please tick all that apply:*

NPPF criteria	Yes	No
<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:*

It may be misleading to state the Council is solely responsible for identifying assets as non-designated heritage assets. As stated in the PPG, and indeed supported by para 5.48 in the proposed Local Plan, there are a number of processes through which non-designated heritage assets may be identified.

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

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

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

Heritage assets include designated heritage assets and assets identified ~~as by the Council~~, 'non-designated' heritage assets.

### 5. Independent Examination

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

Yes

No

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

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

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

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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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Your name or organisation (and client if you are an agent):	Historic England
---	------------------

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

Section/paragraph:	Para 5.54
Policy:	
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes  No

*Please give reasons for your answer:*



## 2. Soundness

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

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

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

Please tick all that apply:

NPPF criteria	Yes	No
<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:

The significance of a heritage asset includes its setting. A wording change is merited
--

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

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

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

Yes

No

Please give reasons for your answer:

--

## 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Development proposals likely to affect the significance of a designated or non-designated heritage asset, including the contribution to that significance made by its setting,

## 5. Independent Examination

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

Yes

No

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

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

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


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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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Your name or organisation (and client if you are an agent):	Historic England
---	------------------

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

Section/paragraph:	Para 5.55 and Para 10.92
Policy:	
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

NPPF criteria	Yes	No
<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:

We welcome reference to taking a "whole building approach"

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

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

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

Yes

No

Please give reasons for your answer:

## 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

### 5. Independent Examination

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

Yes  No

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

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

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

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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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Your name or organisation (and client if you are an agent):	Historic England
---	------------------

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

Section/paragraph:	
Policy:	Policy SP10: Green Infrastructure
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes  No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

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

We welcome reference to the potential for green infrastructure to enhance access to the historic environment (e.g. through criterion j)
---

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

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

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

Yes

No

Please give reasons for your answer:

--

## 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

### 5. Independent Examination

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

Yes  No

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

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

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

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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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## 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):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	DM4: Building Sustainable Homes and Businesses
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes  No

*Please give reasons for your answer:*

### 2. Soundness

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

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

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

*Please tick all that apply:*

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

We suggest further consideration is given to unpacking what is meant by a “suitable” location for renewable energy development. In our opinion, significant detail is not necessarily needed in the Local Plan; but it is likely to help future decision-making if there is greater clarity at this stage on the Council’s approach to identifying what “suitable” means, including with reference to the historic environment.

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

*Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.*

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*



### 5. Independent Examination

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

Yes

No

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

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

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


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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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Your name or organisation (and client if you are an agent):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Para 10.81
Policy:	DM9: Conservation Areas
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

**2. Soundness**

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

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

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

*Please tick all that apply:*

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

Our main concern regarding conservation areas in West Berkshire concerns the large number that do not have a CA Appraisal and, ideally, a Management Plan. To support further action on this, we suggest moving the text from paragraph 10.81 to the text supporting SP9 and adding relevant commitments to policy SP9.

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

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

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

**5. Independent Examination**

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

Yes

No

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

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

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


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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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## 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):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	SP16: Sandford Park, Newbury
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

### 2. Soundness

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

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

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

*Please tick all that apply:*



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

We note and support the proposed criterion: “Development to be limited to the north and west of the site in order to respect the landscape sensitivity of the wider site and to protect the registered historic landscape and setting of the former Sandleford Priory;”

We welcome reference to “Respect the landscape significance of the site on the A339 approach road into Newbury”

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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

### 5. Independent Examination

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

Yes

No

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

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

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


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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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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):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	RSA9: Land between A340 and The Green, Theale (Site Ref: HSA 14)
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

**2. Soundness**

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

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

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

*Please tick all that apply:*

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

The text associated with this allocation should refer to the listed milestone in the north east corner. It is listed GII and the plan should commit to its conservation and ensure it is given suitable setting, preferably in policy. While the milestone may be protected as a by-product of the scheme design, this needs to be made explicit.

Also, we note Englefield House, a Registered Park and Garden (GII) north west of the allocation. The Plan would be improved by acknowledging this nearby designated heritage asset.

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

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

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*

The scheme will conserve the listed milestone and enhance its setting

### 5. Independent Examination

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

Yes

No

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

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

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


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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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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Your name or organisation (and client if you are an agent):	Historic England
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	RSA18: Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

--

**2. Soundness**

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

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

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

*Please tick all that apply:*

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

We note and support the proposed criterion: “An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.

While we welcome reference to special architectural and historic interest of the Compton Conservation Area, the wording is currently ambiguous, with a lack of clarity about what “It” refers to, and we advise reference to “conserve and enhance”, rather than “take into account” which is weaker than required by legislation.

We encourage the preparation of a CA Appraisal as a priority to support effective decision-making and implementation of this policy. Meanwhile, we note the existing Supplementary Planning Document that provides guidance on redevelopment of this site, including (based on our limited review) content on the significance of the conservation area.

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

*Please see the guidance note for an explanation of what ‘Duty to Cooperate’ means.*

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The scheme # will also conserve and enhance ~~explain how~~ the special architectural and historic interest of the Compton Conservation Area and protect its setting ~~has been taken into account...~~

### 5. Independent Examination

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

Yes

No

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

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

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

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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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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):	Historic England
---	------------------

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

Section/paragraph:	
Policy:	RSA25: Long Copse Farm, Enborne (Site Ref: TS2)
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

### 2. Soundness

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

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

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

*Please tick all that apply:*



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

We are unclear if the potential impact on the setting of the 33 and 34, Church Lane (GII) has been considered. Notwithstanding the fact this is the continuation of an adopted policy, suitable mitigation may be needed along the western edge of the site, informed by heritage assessment. We suggest wording for consideration.

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

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

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

Yes

No

*Please give reasons for your answer:*

### 4. Proposed Changes

**Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).**

*You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.*



Development will be informed by a Heritage Impact Assessment (HIA) to minimise any harm to the setting of 33 and 34 Church Lane

### 5. Independent Examination

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

Yes

No

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

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

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


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

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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## Part B – Your Representation

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*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):	Historic England
---	------------------

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

Section/paragraph:	
Policy:	ESA2: Land west of Ramsbury Rd, Lambourn Woodlands (Site Ref: LAM6) ESA3: Land south of Trinity Grain, Lambourn Woodlands (Site Ref: LAM10)
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*

### 2. Soundness

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

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

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

Please tick all that apply:

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

ESA2: We support the proposed criterion: “Development will be informed by a Heritage Impact Assessment (HIA)”, due to the presence of a nearby Scheduled Monument, to assess any assets linked with the former military airfield, and to consider the significance of Lyckwood Farm (GII) and any mitigation needed to reduce harm.

ESA3: We support the proposed criterion: “Development will be informed by a A Heritage Impact Assessment (HIA)”, as amended to correct a minor typo.

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

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

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

Yes  No

Please give reasons for your answer:

### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**ESA3**

Development will be informed by a **A** Heritage Impact Assessment (HIA)

**5. Independent Examination**

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

Yes

No

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

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

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


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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**

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

Section/paragraph:	
Policy:	
Appendix:	
Policies Map:	
Other:	Sustainability Appraisal

**1. Legally Compliant**

*Please see the guidance notes for an explanation of what 'legally compliant' means.*

**Do you consider the Local Plan Review is legally compliant?**

Yes

No

*Please give reasons for your answer:*



## 2. Soundness

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

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

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

Please tick all that apply:

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

Page 9: the opening sentence in Table 4 in the row on historic character does not entirely make sense and needs minor editing i.e. "The conservation of historic, sites and commons, monuments, battlefields, parks, buildings and Conservation Areas has contributed..." Also within this row, we are uncertain about the rationale for including text on new development in the vicinity of nuclear installations and the influence of such development on nuclear safety. If there is a link to historic character, it needs to be made clearer.

Page 15: we advise a minor change as follows to the subobjective to align more closely with the NPPF: "To protect or, conserve and enhance the built and historic environment including sustaining the significance ~~significant interest~~ of heritage assets"

Page 15: there is a minor formatting issue – two bullets on heritage indicators have been merged. Within this merged entry, we particularly welcome the proposed indicator "% of Conservation Areas in West Berkshire with an up-to-date character appraisal (and management plan)".

Pages 73 and 74: the SA refers to "heritage benefits" related to allocations RSA15 and RSA17-RSA22. These benefits need to be made clearer in the Plan for them to be realised.

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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the LPR legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

The SA

Page 15: we advise a minor change as follows to the subobjective to align more closely with the NPPF: "To protect or, conserve and enhance the built and historic environment including sustaining the significance ~~significant interest~~ of heritage assets"

The Local Plan

The heritage benefits associated with allocations RSA15 and RSA17-RSA22 need to be made clearer in the Plan for them to be realised.

### 5. Independent Examination

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

Yes

No

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

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

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

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

*Please tick all that apply:*

*Tick*

The submission of the Local Plan Review for Independent Examination	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>		<b>Date</b>	3 March 2023
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**



Historic England

Planning Policy Team  
West Berkshire Council

Our ref: PL00054479

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

3 March 2023

Dear planning policy team

## **Re: Pre-Submission Draft of the West Berkshire Local Plan**

Thank you for consulting Historic England about the Pre-Submission Draft of the West Berkshire Local Plan. As the Government's adviser on the historic environment, Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process. We have the following comments to make on this latest iteration of the document:

### **General Comments**

#### **1. Our support for most of the Plan's heritage policies**

The Council includes a welcome combination of detailed heritage policies in the Plan. We consider most of these policies to be sound, as detailed in Appendix A.

#### **2. Our objections to policy SP9**

We have concerns about the soundness of policy SP9 on the historic environment.

We assert that "enabling development" should not appear in the Local Plan, in policy or supporting text, because it deals with circumstances when a proposal for development conflicts with planning policies. If criteria on enabling development were included, a proposal could align with planning policies, thereby no longer representing enabling development. We recommend deleting the Plan's text on enabling development, or risk being unsound due to conflict with national policy (paragraph 208 of the NPPF).

Also, there is a missing "and" in policy SP9, which should be added or risk the policy being unsound and, again, in conflict with national policy (paragraph 201); see Appendix A for details.



Historic England, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA  
Telephone 0370 333 0607 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

Please note that Historic England operates an access to information policy.

Correspondence or information which you send us may therefore become publicly available.



Finally, on policy SP9, as the Council knows, we expressed concern in our response to the Council's Regulation 18 consultation in 2021 that it had only 2 Conservation Area Appraisals (CAAs) for the plan area's 53 conservation areas (CAs). We welcome the Council outlining a programme for CA Appraisals and Management Plans (CAAMPs) in its Local Plan, in paragraph 10.81; but we are very concerned by the resourcing that accompanies this, and the progress made since we highlighted our concerns. Additionally, this matter connects with policy DM9 on conservation areas and has the potential to undermine implementation of policy DM9. To be clear, when read in isolation, we do not regard policy DM9's wording as unsound. However, the Council's commitment to CAAs/CAAMPs needs to be strengthened, which we believe could most effectively be done via policy SP9.

While significant detail on preparing CAAs/CAAMPs is beyond the plan's scope, we propose two steps that the Council could take in its Local Plan which would help to address our concerns (in so far as the Local Plan can influence this matter):

- i. Currently the Council's programme for CAAs/CAAMPs is outlined in the section on Development Management, as text supporting policy DM9 on Conservation Areas. We recommend moving this (specifically paragraph 10.81) to support policy SP9, as this is a strategic issue about the Council's strategic approach to conservation areas, rather than a development management issue;
- ii. Also, we advise including additional text in policy SP9 that relates to this programme, underlines the Council's commitment to action and supports the implementation of policy DM9. We share the following wording for consideration, expanding on the opening lines in policy SP9, and reinforcing other elements of the Council's positive strategy for the historic environment:

"Positive action will be taken to ensure that opportunities for the conservation and enjoyment of the historic environment are maximised. For example, this will include, but not be limited to:

- a) producing and adopting conservation area appraisals and management plans;
- b) maintaining a local list of non-designated heritage assets; and
- c) maintaining a list of local heritage assets which are at risk, but which do not meet the criteria for inclusion on the national Heritage at Risk Register.

The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will also be sustained and enhanced through new development, including promoting heritage-led regeneration where appropriate and delivering public benefits from the District's archaeological resources."





### 3. Our objections to allocations RSA2 and RSA17

Our concern about the lack of conservation area appraisals is heightened regarding the following proposed allocations, each of which may impact on a conservation area:

- RSA2: Land at Bath Road, Speen, Newbury: Speen CA
- RSA17: Land at Chieveley Glebe, Chieveley: Chieveley CA
- RSA18: Pirbright Institute Site, High Street, Compton: Compton CA

RSA18 benefits from an existing SPD, which includes some consideration of heritage significance of the area that can inform decision-making; however, we are unaware of any more detailed work on potential impacts on heritage significance associated with RSA2 and RSA17.

As a result of the lack of CAA/CAAMPs and insufficient heritage assessment, currently **we regard RSA2 and RSA17 as unsound** because they are not based on proportionate evidence as required by paragraph 35 of the NPPF. We advise that more detailed heritage assessment is done on RSA2 and RSA17 at this stage, proportionate to the specifics of each case, to inform these allocations. We expand with additional detail in Appendix B.

### 4. Our objections to policy SP17: North East Thatcham

The opening to SP17 includes a commitment to masterplan the site and for the Thatcham Strategic Growth Study (TSGS) to provide guiding principles for the delivery of the site. As a connected point of detail, the final sentence of the first paragraph in policy SP17 does not currently make sense and needs to be revised.

We note that the scale of development in SP17 has been significantly reduced from what is set out in the TSGS. Even so, we recognise that the principles in the TSGS could still usefully contribute to future proposals. That said, the TSGS's contribution on the area's historic environment is limited, meaning its principles will have only limited resonance on heritage.

We note and support a proposed requirement in policy SP17 for a Historic Environment Strategy. However, we advise broadening its scope beyond the narrow treatment of listed buildings on the site. Linked with this it would be helpful to define the Historic Environment Strategy, also making clear that this needs to be informed by heritage impact assessment, which the Council's HELAA states is required for areas THA6 and THA14 and, one infers, THA10. A Historic Environment Strategy could support effective place-shaping and enhance local character across this allocation (including historic Dunston Park, Seige Cross and the land around Colthrop Manor), if it were to connect with all elements of the area's heritage. We suggest the following wording in policy SP9 for consideration:



“Historic Environment Strategy to demonstrate how the site’s historical development, archaeological remains, historic buildings, non-designated heritage assets and parkland will inform the scheme and help to create a sense of place. It should:

- i. be informed by proportionate heritage impact assessment, desk-based archaeological assessment and, if needed, field evaluation; and
- ii. articulate how the proposed scheme would support an appropriate future use of the Listed Buildings in the area and minimise harm to their significance (including demonstrating listed buildings in the area will be conserved and how the impact of the development on their settings has been considered).”

The above revised wording also responds to the lack of reference to archaeological assessment in policy SP17, the need for which is included in the HELAA associated with different sites within SP17. We note also that the TSGS stage 3 report states: “As one of the oldest continuously settled places in the country, archaeological remains are likely. The site displays varied potential for unearthing historic evidence. Scattered finds indicate the presence of Palaeolithic and Mesolithic flint working, and the potential for Iron Age workings related to a site further up the slopes. Historic earthworks are visible on LIDAR scans in the north-western part of the site.”

We regard policy SP17 is unsound without suitable reference to archaeological assessment, which should also be agreed with the Council’s archaeological adviser.

## **5. Consistency in language on archaeological assessment**

The following site allocation policies refer to the need for desk-based assessment and, if necessary, field evaluation; however, the language used is not consistent.

The Council may wish to review the language used across these policies to ensure it improve consistency. We do not consider this is a matter of soundness:

- RSA1: Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)
- RSA2: Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)
- RSA5: Land at Lower Way, Thatcham (Site Ref: THA025)
- RSA10: Whitehart Meadow, Theale (Site Ref THE1)
- RSA11: Former Theale Sewage Treatment Works, Theale (Site Ref THE7)
- RSA12: Land adjoining Pondhouse Farm, Clayhill Road (Site Ref: HSA15)
- RSA13: Land north of A4 Bath Road, Woolhampton (Site Ref MID4)
- RSA14: Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)
- RSA15: Land at Newbury Road, Lambourn (Site Ref: HSA 20)



- RSA17: Land at Chieveley Glebe, Chieveley (Site Ref: CHI23). This site does not currently require a DBA and field evaluation, if necessary, but should. Until this is added, we regard this allocation to be **unsound**, as detailed in Appendix B.
- RSA18: Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)
- RSA19: Land west of Spring Meadows, Great Shefford (Site Ref: GS1)<sup>1</sup>
- RSA20: Land off Charlotte Close, Hermitage (Site Ref: HSA 24)
- RSA21: Land south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)
- RSA22: Land adjacent Station Road, Hermitage. This site does not currently require a DBA and field evaluation, if necessary, but should. Until this is added, we regard this allocation to be **unsound**, as detailed in Appendix B.<sup>2</sup>
- ESA1: Land east of Colthrop Industrial Estate, Thatcham (Site Ref: MID5)
- ESA5: Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)
- ESA6 Policy ESA6 Land adjacent to Padworth IWMF, (Site Ref: PAD4)

### Detailed Comments

Our detailed comments on the plan's policy framework are included in Appendix A and on the proposed allocations in Appendix B. Also we provide some further comments on the Sustainability Appraisal in Appendix C.

I have endeavoured also to reproduce this response using the representation forms, adapted as appropriate, which I hope will help when considering our comments.

If you have any queries about any of the matters raised or consider that a meeting would be helpful, please do not hesitate to contact me.

Yours faithfully

Guy Robinson, BSc, MRTPI  
 Historic Environment Planning Adviser  
 Development Advice – London and the South East Region

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<sup>1</sup> Modified if/as appropriate

<sup>2</sup> The wording of a requirement for heritage impact assessment also needs to be amended in this policy, see Appendix B



## Appendix A: Table of Historic England’s comments on the Pre-Submission Draft of the West Berkshire Local Plan

[Historic England’s comments on the proposed Allocations are set out in Appendix B]

Page	Section	Sound/ Unsound	Comments	Suggested Change
5	Para 3.4, part of the Plan’s vision	Comment	We welcome reference to conserving and enhancing heritage assets. Note that the built environment is not synonymous with the historic environment. Therefore, we suggest addition of the word “historic” in the final sentence of this paragraph.	Heritage assets will be conserved and enhanced and there will be greater opportunity for enjoyment and appreciation of the special qualities of the built, <u>historic</u> and natural environment.
11	Objective 7	Comment	The heading of objective 7 is “Heritage” whereas the text refers to the built, historic and natural environment. We acknowledge the links between built, historic and natural assets and do not object to this wording; but we’d be happy to discuss this further as appropriate, if the Council wish to amend this in response to consultation feedback.	
12	Para 4.6 and Figure 1	Comment	Reference should be made to Registered Parks and Gardens, for accuracy and consistency with the Policies Map. Figure 1 (or perhaps the Policies map?) should also include Scheduled Monuments.	In addition, there are other designations including conservation areas and <u>Registered</u> <del>historic</del> parks and gardens...
17	Policy SP1: Spatial strategy	Comment	The following sentence could be interpreted in more than one way: “The District’s historic environment and environmental assets will continue to be protected and enhanced and used positively in development to establish a distinctive sense of place that nurtures human health and wellbeing.” We infer it is intended to cover the District’s historic environment and all environmental assets, including include both heritage and natural assets. However, if it is intended to focus only on its historic environment and heritage assets, a minor wording change is needed.	
19	Policy SP2: North Wessex Downs AONB	Sound	We support the proposed policy, including taking account of any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. We note this is supported by paragraph 4.28.	

Page	Section	Sound/ Unsound	Comments	Suggested Change
26	Policy SP5: Responding to Climate Change	Comment	<p>While we broadly support the proposed policy, including the intention we infer underlies criterion m, there are ways other than reversibility and minimum intervention that could enable improved environmental performance. So, the criterion as worded could be unintentionally constraining. We suggest simplifying the criterion as shown.</p> <p>Further work the Council may decide to undertake on measures that could enable the District to reach its net zero ambitions could reveal other principles that the Council may find useful.</p> <p>We advise also referring to a 'whole building approach' as stated in paras 5.55 and 10.92 of the submission plan.</p>	<p>Depending on the nature and scale of proposals, development will be expected to satisfy the following criteria:</p> <p>m. To maintain the integrity of the historic environment and to respect the character and improve the environmental performance of heritage assets without compromising their significance, <del>by adopting principles of reversibility and minimum intervention</del> in accordance with Policy SP9. <u>This necessitates taking a whole building approach and use of appropriate materials.</u></p>
33	Policy SP7: Design Quality	Comment	<p>We note and do not object to the changes to this policy since Reg 18.</p> <p>However, we suggest the Council considers referring to design guides or codes, notwithstanding the possibility that "community planning documents" may include such guides or codes.</p>	<p>Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021), or as superseded, and at a local level, this includes neighbourhood plans, <u>design guides or codes</u> and relevant community planning documents that identify the local character and distinctiveness of an area which is valued by local communities.</p>
35	SP8: Landscape character	Sound	We support the proposed policy.	



Page	Section	Sound/ Unsound	Comments	Suggested Change
37	SP9: Historic environment	<b>Unsound</b>	<p>As stated in our cover letter, we believe that the situation regarding CA Appraisals and Management Plans in West Berkshire merits explicit text in the Local Plan's <u>strategic</u> heritage policy, with supporting text (moved from paragraph 10.81 in the Development Management section). We suggest relevant wording for consideration, expanding on the opening two lines of policy SP9 and bringing in other examples of positive action.</p> <p>We note an "and" is missing at the end of criterion j for this collection of criteria linked with substantial harm to read as intended in the NPPF. An additional "and" is needed.</p> <p>Finally, we advise deleting the text on enabling development from both the policy and the support text. By definition within the NPPF, enabling development is development that is not otherwise in accordance with adopted policy. We are therefore of the view that including policy text on enabling development is not a necessary component of a local plan document. A local plan should adequately set out a positive strategy for the historic environment without the need to include such policy text.</p>	<p>Positive action will be taken to ensure that opportunities for the conservation and enjoyment of the historic environment are maximised. <u>For example, this will include, but not be limited to:</u></p> <ul style="list-style-type: none"> <li>a. <u>producing conservation area appraisals and management plans;</u></li> <li>b. <u>maintaining a local list of non-designated heritage assets; and</u></li> <li>c. <u>maintaining a list of local heritage assets which are at risk, but which do not meet the criteria for inclusion on the national Heritage at Risk Register.</u></li> </ul> <p>The historic character, sense of place, environmental quality and local distinctiveness of West Berkshire will also be sustained and enhanced through new development, <u>including promoting heritage-led regeneration where appropriate and delivering public benefits from the District's archaeological resources.</u></p> <p>j. No viable use of the asset can be found in the medium term through appropriate marketing that will enable its conservation; <u>and</u></p>

Page	Section	Sound/ Unsound	Comments	Suggested Change
				<p>Development proposals for enabling development which would otherwise conflict with other policies in the Local Plan but which would secure the future conservation of a heritage asset will be permitted where:</p> <ul style="list-style-type: none"> <li>i. the proposals will not materially harm the heritage value of the asset or its setting;</li> <li>ii. it can be demonstrated that alternative solutions have failed;</li> <li>iii. the proposed development is the minimum necessary to protect the significance of the heritage asset;</li> <li>iv. it meets the tests and criteria set out in Historic England guidance GPA4: Enabling Development and Heritage Assets;</li> <li>v. it is subject to a legal agreement to secure the restoration of the asset prior to completion of the enabling development; and</li> <li>vi. it enables public appreciation of the saved heritage asset.</li> </ul>
38	Para 5.45	Comment	It may be misleading to state the Council is solely responsible for identifying assets as non-designated heritage assets. As stated in the PPG, and indeed supported by para 5.48 in the proposed Local Plan, there are a number of processes through which non-designated heritage assets may be identified.	Heritage assets include designated heritage assets and assets identified <u>as</u> by the Council, 'non-designated' heritage assets.
40	Para 5.54	Comment	The significance of a heritage asset includes its setting. A wording change is merited	Development proposals likely to affect the significance of a designated or non-designated heritage asset, <u>including the contribution to that significance made by</u> its setting,

Page	Section	Sound/ Unsound	Comments	Suggested Change
40	Para 5.55	Sound	We welcome reference to taking a “whole building approach” regarding the retrofitting of historic buildings	
42	Policy SP10: Green Infrastructure	Sound	We welcome reference to the potential for green infrastructure to enhance access to the historic environment (e.g. through criterion j)	
155	DM4: Building Sustainable Homes and Businesses	Comment	We suggest further consideration is given to unpacking what is meant by a “suitable” location for renewable energy development. In our opinion, significant detail is not necessarily needed in the Local Plan; but it is likely to help future decision-making if there is greater clarity at this stage on the Council’s approach to identifying what “suitable” means, including with reference to the historic environment.	
171	DM9: Conservation Areas  Para 10.81	Comment	Our main concern, reflected in our letter in February 2021, concerns the large number of Conservation Areas in West Berkshire that do not have a CA Appraisal and, ideally, a Management Plan. To support further action on this, we suggest moving the text from paragraph 10.81 to the text supporting SP9 and adding relevant commitments to policy SP9.	
172	DM10: Listed Buildings	Sound	We support the proposed policy and flag a minor typo towards the end of the policy – an “is” is not needed	<p>unless justified to the satisfaction of the Council, that the proposed changes, loss or irreversible damage, and/or addition of new features to the Listed Building and its setting are:</p> <ul style="list-style-type: none"> <li>• Less than substantial in terms of impact/harm on the character and significance of the Listed Building and its setting; and</li> <li>• <del>is</del> off-set by the public benefit from making the changes, including enabling optimal viable use, and net enhancement to the Listed Building and its setting.</li> </ul>

<b>Page</b>	<b>Section</b>	<b>Sound/ Unsound</b>	<b>Comments</b>	<b>Suggested Change</b>
173	Para 10.92	Sound	We welcome reference to taking a “whole building approach” to retrofitting energy efficiency measures in historic buildings	
174	DM11: Non-designated Heritage Assets	Sound	We support the proposed policy.	
176	DM12: Registered Parks and Gardens	Sound	We support the proposed policy.	
178	DM13: Registered Battlefields	Sound	We support the proposed policy.	
180	DM14: Assets of archaeological importance	Sound	We support the proposed policy.	

## Appendix B: Table of Historic England’s comments on the proposed Allocations in the Pre-Submission Draft of the West Berkshire Local Plan

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
SP16	Sandleford Park, Newbury	Sound	<p>We note and support the proposed criterion: “Development to be limited to the north and west of the site in order to respect the landscape sensitivity of the wider site and to protect the registered historic landscape and setting of the former Sandleford Priory;”</p> <p>We welcome reference to “Respect the landscape significance of the site on the A339 approach road into Newbury”</p>	
SP17	Thatcham North East	<b>Unsound</b>	<p>As explained in our cover letter, we advise more detailed articulation of the Council’s approach to the historic environment at this location.</p> <p>Also, the policy needs to refer to archaeological assessment, as outlined in our cover letter.</p> <p>We suggest revised wording for consideration.</p>	<p>Historic Environment Strategy to demonstrate how the <u>site’s historical development, archaeological remains and historic buildings and parkland will inform the scheme and help to create a sense of place. It should:</u></p> <ol style="list-style-type: none"> <li>i. <u>be informed by proportionate heritage impact assessment, desk-based archaeological assessment and, if needed, field evaluation; and</u></li> <li>ii. <u>articulate how the proposed scheme would support an appropriate future use of the Listed Buildings in the area and minimise harm to their significance (including demonstrating listed buildings in</u></li> </ol>



Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
				the area will be conserved and how the impact of the development on their settings has been considered)."
RSA1	Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)	Sound	We note and support the proposed criterion: "Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	
RSA2	Land at Bath Road, Speen, Newbury (Site Ref: HSA 2)	<b>Unsound</b>	<p>We note and support the proposed criterion: "Informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>We note and support the proposed criterion: "Development will protect and enhance the special architectural and historic interest of the Speen Conservation Area". We encourage the preparation of a Conservation Area Appraisal as a priority to support effective decision-making and implementation of this policy.</p> <p>In the meantime, we advise more detailed heritage assessment is done to inform the proposed allocation, as outlined in our cover letter.</p> <p>Though this site is carried forward from the adopted site allocations development plan document and at the time of writing a development proposal has been submitted for determination (23/00310), the site's proximity to the conservation area does not appear to be mentioned in the Sustainability Appraisal. In principle we advise more detailed assessment to inform the allocation, given its proximity to the conservation area.</p>	

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
			<p>We envisage particular sensitivities in the south west corner of the site, with the potential to impact on the rural character of the western approach to the conservation area. As the Council will know, it has a duty under the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of that area.</p> <p>Also, paragraph 206 of the NPPF local planning authorities to look for opportunities for new development within Conservation Areas, and within the setting of heritage assets, to enhance or better reveal their significance.</p> <p>In addition, there is the opportunity for any scheme to respond positively to the local context i.e. the character of the conservation area to influence the character of the development in a positive way. For this to be realised, further evidence is needed on the relationship between this site and the conservation area.</p>	
RSA5	Land at Lower Way, Thatcham (Site Ref: THA025)	Sound	<p>We note and support the proposed criterion: "Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p>	
RSA9	Land between A340 and The Green, Theale (Site Ref: HSA 14)	Comment	<p>The text associated with this allocation should refer to the listed milestone in the north east corner. It is listed GII and the plan should commit to its conservation and ensure it is given suitable setting, preferably in policy. While the milestone may be protected as a by-product of the scheme design, this needs to be made explicit.</p> <p>Also, we note Englefield House, a Registered Park and Garden (GII) north west of the allocation. The Plan would be improved by acknowledging this nearby designated heritage asset.</p>	<p><u>The scheme will conserve the listed milestone and enhance its setting</u></p>

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
RSA10	Whitehart Meadow, Theale (Site Ref THE1)	Sound	We note and support the proposed criterion: "The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	
RSA11	Former Theale Sewage Treatment Works, Theale (Site Ref THE7)	Sound	We note and support the proposed criterion: "The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	
RSA12	Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)	Sound	We note and support the proposed criterion: "The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	
RSA13	Land north of A4 Bath Road, Woolhampton (Site Ref MID4)	Sound	We note and support the proposed criterion: "A desk-based assessment to better understand archaeological potential and survival will be required. Subject to the results of the assessment, a field evaluation may be required". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	
RSA14	Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)	Sound	We note and support the proposed criterion: "Development should be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site." The Council may wish to make	

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
			wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	
RSA15	Land at Newbury Road, Lambourn (Site Ref: HSA 20)	Comment	We note and support the proposed criterion: "Development will be informed by an archaeological assessment in the form of a geophysical survey followed by trial trenching if necessary". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	
RSA17	Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)	<b>Unsound</b>	<p>We note the proposed criterion: "The development design and layout will be further informed by a Heritage Impact Assessment;" Leaving aside the redundancy of the word "further", we assert that the evidence base for this allocation is currently insufficient.</p> <p>Chieveley conservation area does not currently have a conservation area appraisal. We advised in our letter of 5 February 2021 that a conservation area appraisal is needed as part of the plan-making process (i.e. prior to allocation), to inform development on this site. Our letter of 5 Feb recommended as a minimum that heritage impact assessment (HIA) is needed to inform the allocation. HIA would enable further consideration of the relationship between the site and nearby heritage assets, inform the approach to hedgerows (identified in the HELAA site assessment) and check some of the details in the HELAA, which states that Tudor Cottage and Coombe House are listed.</p> <p>The Sustainability Appraisal in Appendix 8b also notes that "The site is likely to have a negative impact on heritage assets as the site is adjacent to the conservation area with a number of listed buildings" and that "Survey work would be required and mitigation measures may be required."</p> <p>Also, we note the HELAA site assessment recommends that some archaeological work to be undertaken, but this is not included in the criteria. We suggest it is added.</p>	<u>The scheme will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site</u>

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
RSA18	Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)	Comment	<p>We note and support the proposed criterion: “An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>While we welcome reference to special architectural and historic interest of the Compton Conservation Area, the wording is currently ambiguous, with a lack of clarity about what “It” refers to, and we advise reference to “conserve and enhance”, rather than “take into account” which is weaker than required by legislation.</p> <p>We encourage the preparation of a CA Appraisal as a priority to support effective decision-making and implementation of this policy. Meanwhile, we note the existing Supplementary Planning Document that provides guidance on redevelopment of this site, including (based on our limited review) content on the significance of the conservation area.</p>	<p>The scheme # will also <u>conserve and enhance</u> <del>explain how</del> the special architectural and historic interest of the Compton Conservation Area and <u>protect</u> its setting <del>has been taken into account...</del></p>
RSA19	Land west of Spring Meadows, Great Shefford (Site Ref: GS1)	Sound	<p>We note and support the proposed criterion: “A desk-based assessment to better understand archaeological potential and survival will be required. Fieldwork techniques to better understand the Mesolithic potential may be necessary”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p>	
RSA20	Land off Charlotte Close, Hermitage (Site Ref: HSA 24)	Comment	<p>We note and support the proposed criterion: “The development will be informed by a desk-based archaeological assessment followed by field evaluation if necessary”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>We are not entirely clear what is being referenced in the Sustainability Appraisal when it refers to heritage benefits. We advise making these clearer in the Plan.</p>	



Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
RSA21	Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)	Comment	<p>We note and support the proposed criterion: “An archaeological desk based assessment will be required as a minimum and field evaluation if necessary to assess the historic environment potential of the site”. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.</p> <p>We note the site does not mention Barnaby Thatch (GII) to the north. Proposals need to take account of this designated heritage asset and ensure that they avoid or minimise harm to its significance. We advise ensuring this is recognised in the policy.</p> <p>We are not entirely clear what is being referenced in the Sustainability Appraisal when it refers to heritage benefits. We advise making these clearer in the Plan.</p>	<u>Protect the setting of the nearby Listed Building (Barnaby Thatch)</u>
RSA22	Land adjacent Station Road, Hermitage	<b>Unsound</b>	<p>We note the proposed criterion: “A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets.” This statement does not fully align with the HELAA site assessment.</p> <p>Assessment should also consider the site’s relationship with a nearby a Scheduled Monument (Grimsbury Castle) – a point that is not mentioned in the Sustainability Appraisal for the site. As a result, the wording of this requirement for heritage impact assessment will need to be amended, in discussion with the Council’s heritage advisers. We suggest revised wording for consideration.</p> <p>Furthermore, we are unclear on the rationale for not undertaking a DBA and if needed field evaluation on this site, given the ridge and furrow system identified on the HER. To align with the NPPF, wording needs to be added on a requirement for archaeological assessment.</p>	<p>A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets <u>and the nearby Scheduled Monument (Grimsbury Castle)</u></p> <p><u>The development will be informed by a desk-based archaeological assessment followed by field evaluation if necessary;</u></p>
RSA25	Long Copse Farm, Enborne (Site Ref: TS2)	Comment	<p>We are unclear if the potential impact on the setting of the 33 and 34, Church Lane (GII) has been considered. Notwithstanding the fact this is the continuation of an adopted policy, suitable mitigation may be needed along the western edge of the site, informed by heritage assessment. We suggest wording for consideration.</p>	<u>Development will be informed by a Heritage Impact Assessment (HIA) to minimise any harm to the setting of 33 and 34 Church Lane.</u>

Site Ref.	Location	Sound/ Unsound	Comments	Suggested Change
ESA1	Land east of Colthrop Industrial Estate, Thatcham (Site Ref: MID5)	Comment	We note and support the proposed criterion: "Development will be informed by an archaeological desk based assessment and field evaluation to assess the historic environment potential of the site;" In this case the phrasing implies that field evaluation will definitely be required; is that the case? The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	
ESA2	Land west of Ramsbury Rd, Lambourn Woodlands (Site Ref: LAM6)	Sound	We support the proposed criterion: "Development will be informed by a Heritage Impact Assessment (HIA)", due to the presence of a nearby Scheduled Monument, to assess any assets linked with the former military airfield, and to consider the significance of Lyckwood Farm (GII) and any mitigation needed to reduce harm.	
ESA3	Land south of Trinity Grain, Lambourn Woodlands (Site Ref: LAM10)	Sound	We support the proposed criterion: "Development will be informed by a A Heritage Impact Assessment (HIA)", as amended to correct a minor typo.	Development will be informed by a A Heritage Impact Assessment (HIA)
ESA5	Northway Porsche, Grange Lane, Beenham (Site ref: BEEN10)	Sound	We note and support the proposed criterion: "Development will be informed by an archaeological desk based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site". The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	
ESA6	Policy ESA6 Land adjacent to Padworth IWMF, Padworth Lane, Padworth (Site Ref: PAD4)	Comment	We note and support the proposed criterion: "Development will be informed by an archaeological desk based assessment field evaluation if required to assess the historic environment potential of the site;" In this case, wording changes are needed to ensure the criterion is clear i.e. is the DBA required and then field evaluation, if required. The Council may wish to make wording on archaeological assessment more consistent across its site allocation policies, as highlighted in our cover letter.	

## Appendix C: Sustainability Appraisal

1. Page 9: the opening sentence in Table 4 in the row on historic character does not entirely make sense and needs minor editing i.e. “The conservation of historic, sites and commons, monuments, battlefields, parks, buildings and Conservation Areas has contributed...” Also within this row, we are uncertain about the rationale for including text on new development in the vicinity of nuclear installations and the influence of such development on nuclear safety. If there is a link to historic character, it needs to be made clearer.
2. Page 15: we advise a minor change as follows to the subobjective to align more closely with the NPPF: “To protect or, conserve and enhance the built and historic environment including sustaining the significance ~~significant interest~~ of heritage assets”
3. Page 15: there is a minor formatting issue – two bullets on heritage indicators have been merged. Within this merged entry, we particularly welcome the proposed indicator “% of Conservation Areas in West Berkshire with an up-to-date character appraisal (and management plan)”.
4. Pages 73-75: the SA refers to “heritage benefits” related to allocations RSA15 and RSA17-RSA22. These benefits need to be made clearer in the Plan for them to be realised.