

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

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

This form has two parts:

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

PART A: Your Details

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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:		
First Name:*	Paula	
Last Name:*	Saunderson	
Job title <i>(where relevant):</i>		
Organisation <i>(where relevant):</i>	████████████████████	
Address* <i>Please include postcode:</i>	██████████ ██████████ ██████████	
Email address:*	██	
Telephone number:	██████████	

**Mandatory field*

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

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

Section/paragraph:	See emailed document
Policy:	See emailed document
Appendix:	See emailed document
Policies Map:	See emailed document
Other:	See emailed document

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

Not qualified to say

No

Not qualified to say

Please give reasons for your answer:

See Responses Document

2. Soundness

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

Do you consider the Local Plan Review is sound?

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

Please tick all that apply:

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

Please give reasons for your answer:

See emailed detailed document.

None of the **Key Mixed Sites for Newbury** are included such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, and without these Key Sites and any specific Policy around them.

The Plan omits **Key Brownfield Sites for Newbury** which has favoured the Sandleford Greenfield site.

It omits one **Key Employment Site for Newbury**.

Without a **Newbury Settlement Sub Area SP Policy** there is no clearly articulated Map or Data for this important Major Town.

Without clear **Maps & Data & Lists for Newbury** of what is already promised, is underway, and the remaining numbers required by the area it is not an Effective Plan as it stands.

Therefore, I conclude the Plan is **Not Sound for Newbury Settlement** and:

- Is Not Positively Prepared
- Is Not Justified
- Is Not Effective for the next 20 years, and this Plan as it stands will Not Achieve the Visions

My document highlights many examples.

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

Not qualified
to answer

No

Not qualified
to answer

Please give reasons for your answer:

Not a Planning Consultant

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.

See attached document. In Terms of Newbury Settlement it needs to include the following Key Items for the Major Town.

Include Key Mixed Sites for Newbury such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, Old Magistrates Court and without these Key Sites and any specific Policy around them.

Include Brownfield Sites for Newbury to balance against the favoured the Sandford Greenfield site.

Include the missing Key Employment Sites for Newbury.

Include a Newbury Settlement Sub Area SP Policy with a clearly articulated Map or Data for this important Major Town.

Include Maps & Data & Lists for Newbury of what is already promised, is underway, and the remaining numbers required by the area it is not an Effective Plan as it stands.

5. Independent Examination

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

Yes

Yes

No

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

I seek an change which is to introduce Policies and Site Allocations which are not currently in the Plan for the Sub-Area Newbury Settlement.

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

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	Paula Ann Saunderson	Date	28/02/2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

From Mrs Paula Ann Saunderson, [REDACTED]
[REDACTED]

CHPT 1 - INTRODUCTION & BACKGROUND

I am an Ordinary Resident living in a small back-to-back house facing the River Lambourn in Clayhill Ward of Newbury. My 40 year old property is now at High-Risk of Surface Water Flooding (Pluvial) and although not showing on the EA Flood Maps my Fluvial Risk is rising due to continued development over Bourns upstream and degeneration of the Spatial Flood Defence (SFD) – non manmade River Banks- outside my only entrance door. My family goes back to at least the 1800s and I have lived in 5 villages and 2 of the Towns in West Berks.

During my Career as a Senior Change & Transition Manager in FTSE 100 Company and then as a self-employed Consultant I have also lived and worked in other areas of the UK including Surrey, Cheshire, Oxfordshire, Hampshire, Devon, Scotland -Central & Highlands, and commuted all over England.

I also ran a function within a major bank to rationalise the Branch Network for the Thames Valley region which stretched from Banbury to Godalming and Slough to Marlborough so know this part of the Southeast quite well.

I am a Newbury Clayhill Ward Flood & Drainage Warden, a member of the Lambourn Valley Flood Forum, a member of the Working Party to look at the Lower Reaches of the R. Lambourn SAC/SSSI, and a lay member of the newly formed Newbury Flood & Drainage Action Group.

I also run an informal Project which makes comparisons across a basket of about 12 Local Authorities that are of mixed design and size– County, District, Borough, Parish, Unitary etc., and we are currently looking at Local Plan preparation. We find Plans such as Chichester (similar in demographics), Cheshire East, Eastleigh & Lancaster much easier to navigate and understand,

I have been a Parish Councillor in Hamble-le-Rice based on the River Hamble.

I am not averse to change however I do want to ensure that key Environmental factors are considered in the best way possible for Newbury as a main centre in what will become an increasing large and denser area with not much clarity around basics like Building heights and styles which are suitable for the nearby Communities.

I am wary about Building in or near the significant Flood Risk Areas within Newbury Clayhill Ward and do not think enough attention is given to building near or over our natural watercourses and seasonal Groundwater fed Bourns. Hence, I am taking the time to submit this response.

If any statements I make are factually incorrect then this is probably because I am not trained in Planning Law or it is not always easy to find Maps & Documents that are relevant to the main Sub-Area of this Plan, which for me is the Settlement of Newbury.

CHPT 2 - CONTEXT

I am concentrating on the Newbury Area which should be considered as a Sub Area within the Spatial Strategy Area known as Newbury & Thatcham Area, and the Map of the Settlement Boundary for the Newbury Area is below. Unfortunately understanding the Boundaries is difficult as all the Boundaries differ.

Newbury Town Council Boundary is different to the Newbury Unitary Wards which appear to be different to the Newbury Settlement Boundary and the Landscape Character Assessments and the study areas within the Appropriate Countryside Designations/Green Gaps Study guide used within the Evidence Base.

This makes evaluating the future for Newbury very difficult and means making Parish level responses to Planning Applications and Local Plans more complex.

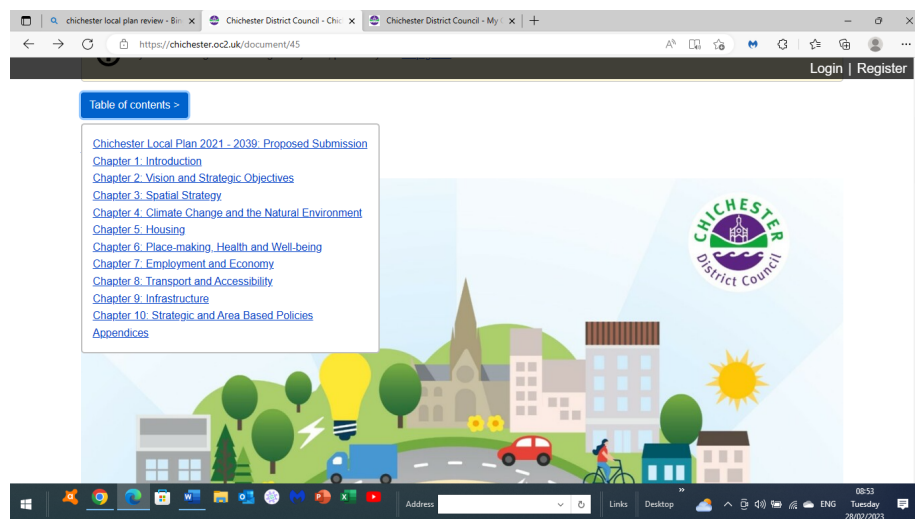
What is evident from this plan is without clear lists of what is on the cards for the Newbury Settlement over the next 20 years it is impossible to say whether any of the Visions will become reality. Without being immersed in the detail and setting up our own spreadsheets it is impossible to say which Residential & Employment & Retail Sites for Newbury are included in which figures and how much of the residual requirements will be demanded within the Newbury Settlement.

If the LPR is going to take a Spatial Area approach and concentrate Delivery and Implementation on the main Settlement Hierarchy, then the least that we can expect is clear projected Figures for the Major Town with detailed Tables behind them.

Navigating the Contents & Structure

In Terms of the Contents & Structure of this Submission and the ability of Planning Officers, Developers, Residents, and the Inspector to follow it and make sense of the 101 Policies within it, I think there are better and simpler Structured Plans out there which could be emulated. A re-cut Structure could lead to better Planning and Policy compliance for after adoption of this new Local Plan 2022-2039, and allow more logical feedback from Residents. Many of the Climate Change topics are scattered as are the Housing Policies and the Development Management Policies could be more logically grouped.

Case Study – Chichester



What is evident from this plan is without clear lists of what is on the cards for the Newbury Settlement over the next 20 years it is impossible to say whether any of the Visions will become reality. Without being immersed in the detail it is impossible to say which Residential & Employment & Retail Sites for Newbury are included in which figures and how much of the overall and residual requirements will be placed in the Newbury Settlement.

Evidence Base Documents

In Terms of the Evidence Base. There are late arriving Documents which have now been thrown out for input from Newbury Town Council or to Public Consultation, and some have been included without any input or

Paula Saunderson – WBC LPR 2022-2039 Section 19 Consultation Response

consultation, and for me, that this renders the plan Unsound and not Positively Prepared as a Newbury resident. The fact that this Section 19 Consultation will not go back to Council before Submission does not give any confidence in this particular part of the process.

Examples of some of the Documents are as follows:

- Draft Local Transport Plan (LTP4) Strategy 2024-2039- launched 8th Feb 2023, ends 22nd march 2023
- Draft new Council Strategy 2023-2027 – launched 13th Jan 2023, ended 26th Feb 2023
- Draft Newbury Town Centre Conservation Area Appraisal & Management – launch 12th Jan 2023, ended 23rd Feb 2023. No input was sought from the Newbury Society during preparation.

And Key Documents such as the Appropriate Countryside Designations Studies (for Green Gaps) of which many border Newbury Settlement have not seen input from NTC Planning Committee, or asked the views of nearby Residents.

And I am totally surprised at how late in the whole LPR process the consideration of Green Gaps has been.

CHPT 3 - SHAPING WEST BERKSHIRE: VISION & OBJECTIVES

OUR VISION

Currently we have more than One Vision Document mentioned within the Main Submission and the Evidence Base.

- The Vision to 2036 https://citizen.westberks.gov.uk/media/46989/West-Berkshire-Vision-2036-2019/pdf/WBV_2036_final_19.pdf?m=636903249717100000
- A Newbury Vision to 2026 <https://www.westberks.gov.uk/newbury-vision>
- West Berkshire Strategic Vision to 2050 – the Icen work which is part of the Evidence Base for this LPR, which in fact does not cover the whole of West Berks so is incorrectly titled. This piece of work got off to a rocky start as the Inputs Survey was launched via a Facebook Advert and not through the WBC Newsletters or Consultation/Survey Portal.
 - https://www.westberks.gov.uk/media/53790/West-Berkshire-Visioning-November-2022/pdf/West_Berkshire_Visioning_Document_November_2022.pdf?m=638103394978730000
 - https://www.westberks.gov.uk/media/53832/West-Berkshire-Visioning-Baseline-Report-March-2022/pdf/West_Berkshire_Visioning_-_Baseline_Report_March_2022.pdf?m=638055061124700000
 - https://www.westberks.gov.uk/media/53831/West-Berkshire-Visioning-Socio-Economic-Report-March-2022/pdf/West_Berkshire_Visioning_-_Socio-Economic_Report_March_2022.pdf?m=638055061032800000

This makes commenting on Visions quite complex and having asked a question to Executive I am no clearer.

Having studied the Transport for Southeast SIP 2050 and the Solent to Midlands Sup Doc, and the new Draft Local Transport Plan (LTP4) Strategy 2024-2039, I have a concern that the minor Transport Improvements planned for the Highways England Network, and the Newbury & Thatcham Spatial Area will not be sufficient to allow that Spatial Area to function effectively and efficiently, and Visions in this respect will be hard to achieve.

OUR STRATEGIC OBJECTIVES

For me there is a huge gap in relation to preservation and enhancement of wildlife habitats for native flora and fauna. Missing is the Objective for NATURE RECOVERY. This should at least be added as a 12th Objective, or the 12 Objectives linked up into fewer more Strategic Objectives.

Nature Recovery is not an Objective that seems high on the agenda of WBC and only a small % of their own lands are managed to maximise recovery of Wildlife Habitats. No Current State Assessment of lands has been undertaken and there is very little money in the IDP for Nature Recovery.

Knowing from personal experience that the AONB is not rich in natural flora and fauna being mainly large-scale Agriculture & Forestry and subject to Wildlife Crime, and is much depleted, I really think not having Nature Recovery as a Key Objective makes the Legality & Soundness of the plan questionable, given that the high-level contents of the Environment Bill have been known for at least 4 years and enacted in November 2021. Especially as there has been no work on the Green/Blue Infrastructure which was promised in the Old Plan.

Objective 4 – Economy - would be more focused and measurable if it was **Employment & Economic Development**

Objective 5 – Town Centres - clearer if it was **Settlement Centres** and it listed those in-scope for the duration of this plan. And somewhere within the Policies in this Plan we need clear identification of Settlements that are designated as Rural. As Centre Designs will vary between Urban & Rural.

Objective 6 – Culture - could be **Leisure & Culture** as the 2022 Leisure Strategy is not submitted within the Evidence base and the Plan is not Effective without it as it identifies Sites for re-development which are not included in the Plan. I believe plans are underway to produce a Leisure & Culture Strategy.

Objective 7 – Heritage could be **Heritage & Historic Environment** as Heritage is an often mis-understood term. Heritage is not defined in the Glossary of Terms.

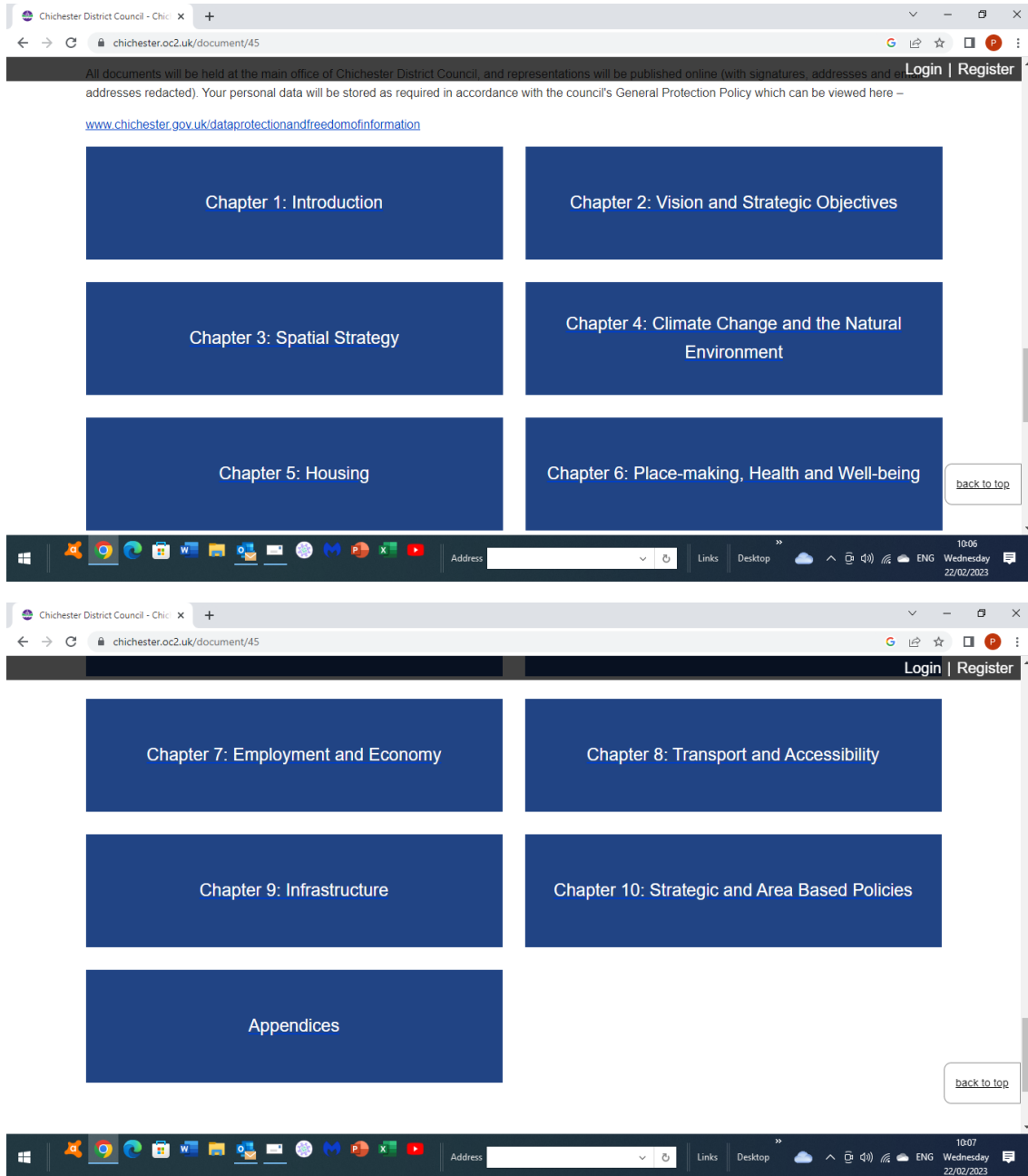
CHPT 4 - DEVELOPMENT STRATEGY: OUR PLACE-BASED APPROACH

BACKGROUND

As the **NPPF** is under Review and a Public Consultation is underway it is difficult to place the Legality & Soundness of this plan in that Context. Whether this LPR will meet the NPPF & PPG going forward is unknown and as having this Plan with its many missing key Sites will not make any difference to the Planning Applications coming forward in 2023, I would prefer to see this Submission Delayed. This is mainly because I am concerned how and where the Employment to serve an extra 9000 Households will come from without a major increase in Commuting which is not catered for in the Plan.

I am also struggling to rationalise the contents of this Submission beyond this point and would have preferred to see the Document Structure in a clearer format such as in this Case Study below from Chichester Section 19 Submission.

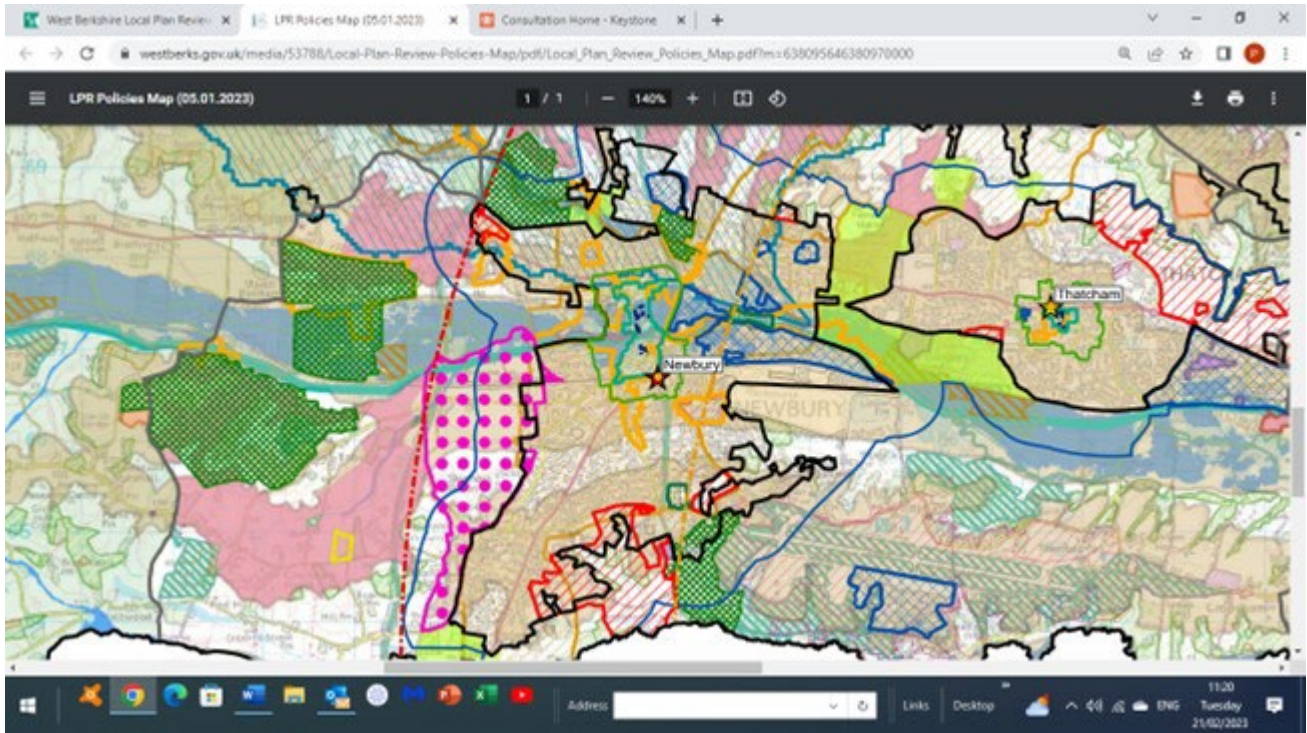
Paula Saunderson – WBC LPR 2022-2039 Section 19 Consultation Response



THE SPATIAL AREAS

I am concentrating on the Newbury Area which should be considered as a Sub Area within the Spatial Strategy known as Newbury & Thatcham Area, and the Map of the Settlement Boundary for the Newbury Area is below. We need Policy for Newbury Settlement such as a refreshed ADPP2 Pg 25-27 of the Local plan 2006-2026.

https://www.westberks.gov.uk/media/36374/Core-Strategy-Final/pdf/Core_Strategy_Final.pdf?m=638047964894800000



https://www.westberks.gov.uk/media/53788/Local-Plan-Review-Policies-Map/pdf/Local_Plan_Review_Policies_Map.pdf?m=638095646380970000

POLICY SP1 – THE SPATIAL STRATEGY

With old Policies such as ADPP2 for Newbury disappearing and as Newbury does not have its own SP Policy in this new Plan it is impossible to establish how many of the proposed 9000 residential dwellings/households and 50,816sqm of Office Space Employment or 91,109sqm of Industrial Space will be within the Newbury Area as a sub-set of the Newbury & Thatcham Spatial Area.

ADPP2 should not be made redundant- an updated version should be included.

There is far too much windfall development in the Newbury Sub-area which has been outside of Development Plan Documents and has been subject to Policies which were not necessarily very specific or leading edge. The Scale of Development in terms of Density, Height, Design, and Sustainability are important in what was an Old Market Town as it transforms into what may appear to be a Mini City. Design Codes are not clear and the rush to get through a Conservation Area Appraisal for Newbury without involving local expert Societies is an example of the lack of Duty to Co-operate.

To me having a Spatial Sub Area with Policy for Newbury is important as I already live in a densely populated area near the major road networks and very close a plan to the planned Redevelopment of WBC owned lands on the London Road Industrial Estate – the old NEW 1 LRIE Area which has mysteriously escaped being given a Site Allocation under either SP13 pg 55 or SP20 pg 73.

A comprehensive Development Plan led Policy Framework should be put in place for Newbury Settlement especially as several key Housing, Mixed and Employment Sites within the Sub Area are entirely missing from this Plan.

Lack of Clarity for Newbury Sub Area Sites

Sites seem to be coming in and out of scope via not clearly defined reasons or criteria and there is no clear table such as this example below for Newbury Sub Area. The example comes from the Chichester Section 19

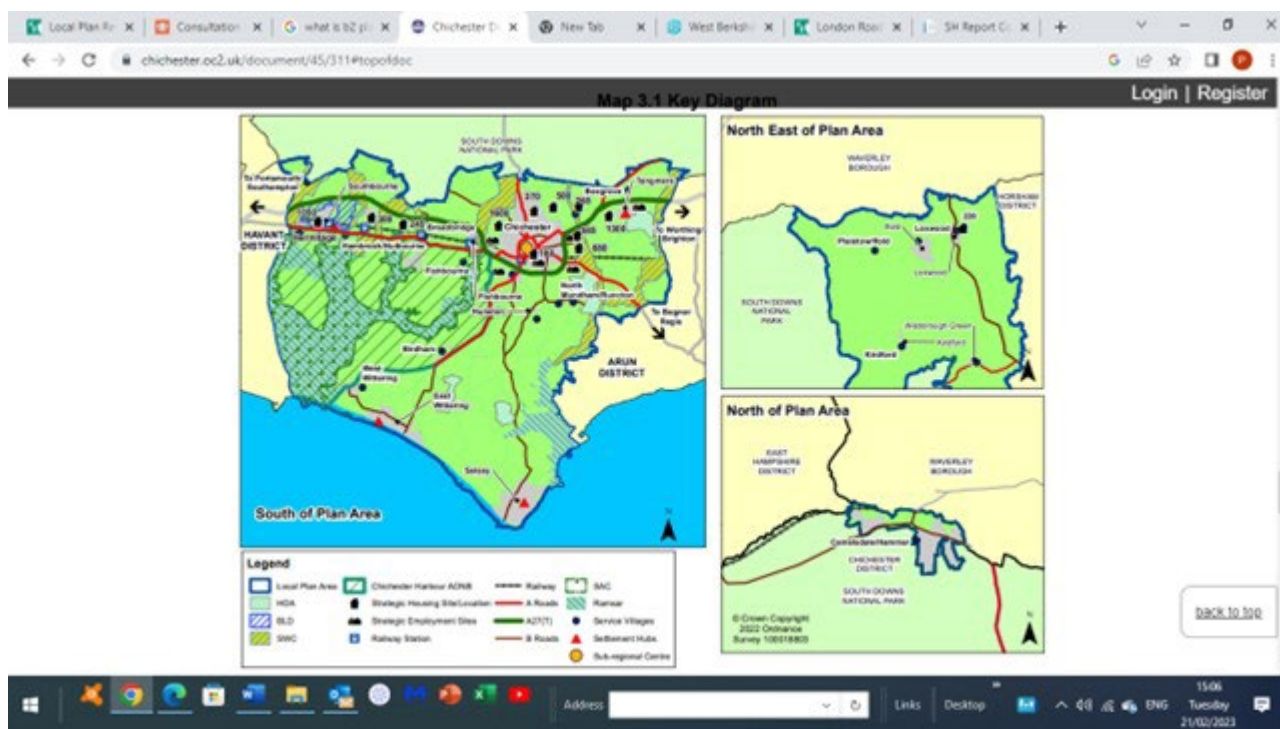
Consultation currently underway which is much easier for residents to understand than the West Berks Consultation.

Newbury needs its own SP as it is a separate Community from Thatcham and should have the Green Gap between the 2 settlements clearly defined and protected as a Green Gap. That Statement is needed in an SP for Newbury.

It would be easier to understand if we had an **SA** Policy or a SPATIAL STRATEGY identifying the 3 SPATIAL AREAS then Major Settlements could EACH have Individual SP as is the norm under many other Local Plans such as Chichester, Cheshire East, Eastleigh (which groups related Wards), Lancaster, all of which have individual Policies for major areas within a Spatial Area.

CASE STUDY - E.g., Chichester is currently consulting on its Section 19 Proposed Submission and it has much clearer Summary Information shown in total and by Sub Areas. It also has clear Policy for Sub Sub Areas such as Chichester City, Chichester East & West

<https://chichester.oc2.uk/document/45/311#topofdoc>



Newbury Town Council (NTC) have been given an explanation that Residential Site Allocations (RSA) & Employment Site Allocations (ESA) will not be made for several parcels of land as they are deemed to be within the Settlement Boundaries, however as several of the RSA Site Allocations ARE in the Newbury Settlement Boundary then this as a reason is illogical and invalid.

e.g.,

- RSA3- Coley Farm is in the Settlement Boundary shown on the Map, it is in Newbury Clayhill Ward, work has started on site.
- RSA1- North of Newbury College appears to be in the Settlement Boundary
- RSA2 – Bath Rd Speen looks to now be in the Boundary?

- Sims Metal Yard (Old Passey Yard) has outline planning but is not yet started so why is it not in the Plan when Coley Farm is in the Plan and it has already started?
- Lambourn Site Allocation is in the Settlement Boundary

The **Map of Brownfield Sites** has disappeared, and the London Road **Industrial** Estate has been withdrawn. We are now left with a Spreadsheet with individual entries and no overall picture.

I cannot find the **Map of Dedicated Employment Areas (DEA)** and they are not listed in **DM32**? I can see the old PEAs on WBC GIS, but it is not possible to make a comparison of Old to New boundaries.

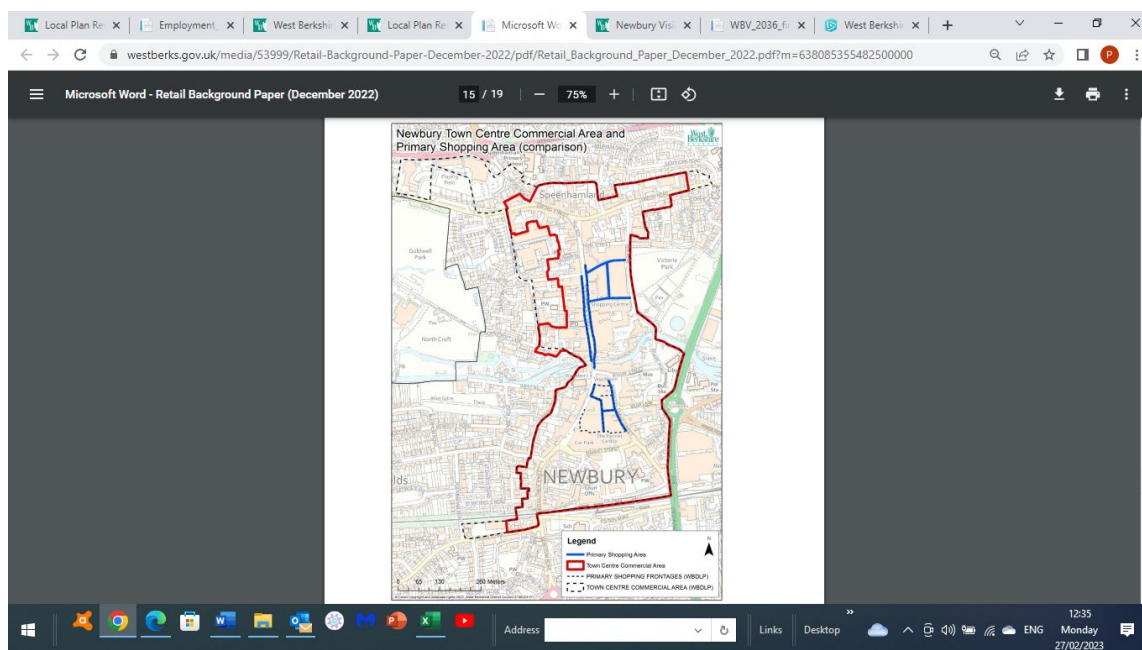
Within this Submission I may now diverge from the Structure of the Submission Document as we are missing a Strategic Policy for Newbury and the contents which relate to Newbury Settlement are now spread amongst other Chapters in the LPR.

Retail & Commercial Areas within the Newbury Settlement Area

Within Chpt 7 there is no Strategic Policy for Retail and Commercial Space. I feel this is an omission and the subject is not adequately covered **under SP22 – Town & District Centres**.

Many Retail Sites

Within Newbury there are many and varied Retail & Commercial Spaces yet the only Map I can find for these is this one for the Town Centre Retail Area which I presume will be changed to the new Red Line under this LPR?



There is no big Out of Town Retail Area and commuting between the existing Retail Areas is common. This is mainly by Car/Van due to the nature of goods being purchased. And we don't have a Car City so residents shopping for vehicles are travelling between spread sites at either ends of Newbury.

Recent Retail growth with a new LIDL Store along the Clayhill A4 Corridor Retail Area, and built on the Floodplains, have given rise to poor Town Planning with Flooding and smells from the Drainage. And it is obvious that the Buffer Zones for the Kennet SSSI were not considered with this site, and the state-of-the-art modern SuDS are not working.

Likewise the Wash Common & Greenham Retail Area is growing without Policy in place. Whilst this will be closer to Sandford housing than the Town Centre and Clayhill A4 Retail Centres there will still be journeying between the 3 Areas.

Because there is no SP for Retail & Commercial under Chpt 7, Existing Retail & Commercial Areas are not mapped on the LPR Policies Map and there is no over-arching Policy for Retail & Commercial which allows a DM to be put in place for Key Retail Centres & Policy **DM34 – Retail Parks** does not include Town Centre Retail, or Rural Service Centres.

Newbury NDP

The Newbury Neighbourhood Development Plan (NDP) is in its infancy and could take years to develop if it ever comes to fruition, and we have been advised it will NOT include Development Sites of any description??

As the Major Town and the Settlement earmarked for Maximum growth by the Unitary Council It is doubtful that a Newbury NDP would be allowed to truly reflect the wishes of its Residents.

Soundness

This means all the missing sites identified in this Document will not have the benefit of coming before a Planning Inspector. This position, in my view, makes the LPR 2022-2039 **Unsound** in respect of the Newbury Settlement.

The missing Sites mean it has **not been Positively Prepared**,

It is **Not Justified** in terms of Households vs Infrastructure vs Employment as this is not adequately explained for this Settlement.

As it is without the missing Sites which are required to make it work it will also **Not Be Effective**.

SP2 – NORTH WESSEX DOWNS - AREA OF OUTSTANDING NATURAL BEAUTY

This AONB is not a Natural Area. It has important Geological features, but the Flora and Fauna on the Lands are very constrained by intensive Farming & Forestry. There is no Strategic Policy in respect of the Rural Economy and Agriculture

Overall, having lived in many villages in the AONB, and more recently in Boxford for 3 years I do feel that the over reliance on a Planning Officer defining the Settlement Boundaries does rather stifle the Organic Growth of the villages. They are becoming Unaffordable and very affluent areas and every property is bought up for expansion. There are hardly any 2–3-bedroom Bungalows left for the ageing population. Electronically Gated properties are created, Dark skies are compromised with the desire for Street Lights, Bats are driven away to allow Developments to go ahead, and Pavements are now required for Safe Active Travel.

Generally new residents do not have much empathy with Wildlife which is a reason for having Nature Recovery at the heart of our LPR Objectives. Rather than Barbour Wellies and Jackets the latest desirable 'Must Have' is a Mini-Digger, and bright Security Lighting that can be left on all night under the guise of Security.

Again, within Chpt 7 – which should read Economic & Employment Growth there is no Policy for Agriculture, Horticulture, Forestry and there are no DM Policies under chpt 12. Apart from DM 36 – Farm Diversification which is rather specific.

And the terminology in terms of Countryside vs. Rural vs. AONB definitions is not inherently clear within the Policies.

I doubt we will ever again see Organic Growth back in our Rural settlements and as the Affluent are not really Bus users achieving sustainable Bus Networks for the AONB is highly unlikely.

Maybe it is the way that the Submission Document is structured however I am glad I am not reviewing it for its Rural or AONB or Countryside Content as it would be better to have all relevant DM'S grouped together.

SP3 – SETTLEMENT HEIRARCHY

It is what it is. Quite constrained for Rural Villages which is a great pity as it has now become almost only possible for the Affluent to live in our Rural Areas. The less Affluent are priced out, there is little supply and no Plans to deliver replacement Affordable or Social Housing and private Rental is very expensive.

The overall approach just feels like there are influences at play other than logical apportionment of developments within Boundaries, and the conflicts between Settlement Boundaries, Ward Boundaries, Parish Boundaries, Landscape Character Appraisal Boundaries, Appropriate Countryside Designation Boundaries, Employment Boundaries need a thorough review especially for N& NE part of Newbury Clayhill Ward, Shaw-c-d, Speen, Cold Ash & Thatcham North East.

SP4 – AWE Aldermaston & Burghfield

No Comment as I hope the Plan will attempt to match Jobs with appropriate Housing.

CHPT 5 – OUR ENVIRONMENT & SURROUNDINGS

A General Comment is that I find this Chapter a little confusing and lacking and if it were retitled **Climate Change & the Natural Environment** it would be more logical and easier for Planning Officers & Developers to find and follow development Planning Policy.

SP5 – RESPONSE TO CLIMATE CHANGE

This Policy is a bit motherhood and apple pie. And I expect to see much more Policies identified under this as an Umbrella topic:

- Standalone Renewable Energy, Solar Farms (WBC are building one themselves so need development policy), Windfarms, Hydro- electric, Bioenergy, (no tidal)
- Water Management, Water Supply, Flood Risk Management, Sustainable Drainage, Water Protection Zones, Water Quality, Wastewater & Sewage disposal, Water Source Protection Zones, Water Pollution, Chalk Rivers Management, Canalside development, Water Neutrality/NNZ,
- Preserving the Natural Landscape, Landscape Gaps, Local Wildlife Corridors,
- Biodiversity, Biodiversity Net Gain, Geology
- Landscape Character, International & National Designated Habitats, Trees/Hedgerows/Woodlands as part of Landscape, Countryside
- Air Quality Management & Air Pollution
- Lighting Management & Light Pollution. I cannot see a Dark Skies Policy
- Noise Management & Noise Pollution
- Preventing Heat Hotspots
- Managing Contaminated Land, Source Protection Zones, Building on Contaminated Land, Managing Pollution from Contaminated Lands – no current Contaminated Land Strategy or Policy (it has expired)

SP6 – FLOOD RISK (and Sustainable Drainage – SuDS)

Like many other Local Plans, I would prefer SuDS to have its own SP, rather than being a DM or SPD.

My research is too long to go into here but suffice to say Planning Officers have had little attention to Flood Risk and SuDS, with the SuDS SPD often not quoted as a Material Consideration.

The LLFA has been under resourced and does not look at Minor Developments, even though Newbury is identified by the EA as a Flood Risk Area, and the SuDS SPD 2018 states that ALL Planning Applications in Newbury should include a Surface Water Drainage Statement or Strategy (SWDS) these are often Not demanded at Validation Stage and were not on the list of Documents required at Validation. NB. The link to this within the Submission Document does not work.

The EA Map system for Developers/Planning to look up flood risk does not include the Surface Water Risk Maps or Groundwater Risks Maps so having a deficient search tool is not helpful.

Hence many developers do not take RoFSW from Upstream into account when calculating SuDS and groundwater impacts are often a mystery. As it is quite possible to get more than 10 units on less than 1 hectare sometimes Flood Risk from Pluvial, Groundwater & Sewage can go un-discovered or un-challenged.

Many Planning Officers are not fully aware of the SuDS SPD 2018 and comment on Flood Risk in Officers Reports is often sketchy, and until I started to raise awareness local Councillors had little knowledge.

The Actual Policy seems to repeat much of which is, thankfully, now part of the NPPF & the Flood Risk PPG so if change is made will this Policy need updating? The Policy does not give an indication on the absent Methodology for Cumulative Impact Assessment from ALL SOURCES, that is required by the NPPF Chpt 14 Para 160. Assessing Cumulative Impact Of Developments On Flood Risk In (a) Catchment Area – CIOD OFRICA – is covered under recent addition to the SFRA Level 1 – via Addendum 1- however it does not include the Methodology. The absence of this caused residents not to be able to move into new properties at Shaw Valley.

SP7 – DESIGN QUALITY/DESIGN CODES

Again, not clear whether they will adopt the National Design Codes AND the NEW National MODEL Design Codes in full or whether they are going to write their own as demanded by the July 2021 NPPF.

And whether the Old Design SPD and incumbent individual policies of 2006 will become defunct? Likewise the fact that the Newbury Conservation Area Appraisal is still under negotiation puts parts of this Policy in the 'sheep' category, especially as some of the links don't work and 5.35 there is no list of Documents required at Validation stage of a PA. When I last gave feedback the Validation List of Documents did not include a Surface Water Drainage Statement which the SuDS SPD 2018 says should be submitted with every planning application etc. etc

The Newbury Society were cut out of the process for Designing the revised Newbury Conservation Area when Consultants came onboard. And the deadline for rushing through the Newbury Conservation Area Appraisal is not conducive to good decision making and one can only assume the rush after years of non-action is so that it can feature in this plan?.

As a minimum this SP7 should state which of the new and old National Codes it is going to comply with, what will happen to old Policy, and list the other Policies within the Plan that will input into overall Design Quality.

SP8 – LANDSCAPE CHARACTER APPRAISALS

I am not sure that Town & Parish Councils have had input into these Appraisals, and I personally have concerns that the influences that prevail around the Boundaries between Newbury Clayhill & Cold Ash Parish Council & Shaw-cum-Donnington Parish Council may have come into play.

Within the Evidence Base there appears to be no Landscape Character Appraisal for Site Allocation RSA3 – Land at Coley Farm, Stoney Lane, Newbury. As the Site is up on the hillside and currently agricultural land there could be impacts on the views of the hillside. IF LCA has taken place within the Planning Application or for the Appeal then the pages of the WBC web site could do with updating.

SP9 – HISTORIC ENVIRONMENT

No comment apart from the Objective is called Heritage and both could do with being renamed as Heritage & Historic Environment and both need defining in the Glossary of Terms.

The local History Societies and the Newbury Society sometimes feel marginalised in terms of their input to key Heritage & Historic Environment Policy Documents & Planning Applications.

SP10 – GREEN INFRASTRUCTURE

It is very disappointing that there is no proper Evidence work within this Plan as the promises made under OLD Policy **CS 18** of a Green Infrastructure SPD never materialised. It is obvious from looking at the new development which has taken place that significant opportunities have been missed due to the lack of a GI Strategy, Categorisation, and mapping by typology.

And there has been no attempt to Categorise or give typologies to Public Open Spaces which has led to confusion over the Categorisation of the Old Football Ground with a grass pitch at Faraday Road at the end of the LRIE and next to the Kennet SSSI. At one stage I identified it was within the Brownfield BR/2017/29 Boundary which was incorrect. The Old Newbury Town Football site should be allocated as a separate site within the Plan and given some policy that clearly states its Status and value as an Asset of Community Value. What its final use can be must be determined after a holistic Flood Risk Assessment & Surface Water Drainage Strategy for the wider site (NEW1 – LRIE or larger DEA) has been produced. It may be needed as a Wetland!!

Likewise, without this Work and Categorisation of POS the Playing Pitch Strategy has become dominant and led to the possibility of the Manor Park NATURE-BASED Field with No Buildings and significant wildlife (Bats, Badgers & Slowworms) near the Coley Farm (RSA3) being turned into a Football Pitch. The Manor Park field also forms part of the SuDS for the houses down the hills in Turnpike – it is on a slope and is often water-logged and a small kiddies play-park has been agreed as part of the POS Off-site provision for the Coley Farm development.

Without the presence of a Green/Blue Infrastructure or BAP or a Leisure & Culture Strategy the Playing Pitch Strategy is dominating, and it should be demanding more Playing Pitch space within Developments rather than trying to pinch what is already there for other purposes – such as walking and Nature preservation and recovery.

This new Policy is not strong enough as it does not clearly articulate how much the buffer zones should be,

There is no DM for the Canal Corridor,

DM40 – Public Open Spaces -is quite loose and it gives no details on criteria for when Sports Pitches need to be provided.

DM12 – Registered Parks & Gardens – relates only to Historic sites and I find the correlation of the DM Policies not obvious and would rather see them collected under headings such as those in the Case Study.

And Non-Delivery of the promises in the old CS18 was never monitored via the AMR as it mainly concentrated on Housing delivery and not ALL Policy delivery.

DM2 - I have concerns around this Appropriate Countryside Designations Study which I am not sure any of my elected representatives will have seen?

https://westberks.gov.uk/media/53791/West-Berkshire-Appropriate-Countryside-Designation-Study/pdf/West_Berkshire_Appropriate_Countryside_Designation_for_web.pdf?m=638103394389630000

The Old Newbury Town Football Ground Public Open Space

Again this is an old problem which is still seeing much discontentment over its future and as a separate Recreational Space next to the Kennet SSSI it needs a Sita Allocation and some DPD Policy behind it to protect and reform its future. Whilst it sits in limbo it is under utilised as a recreational space, its buffering function is not being enhanced for Nature Recovery or as part of the Wildlife Corridor.

SP11- BIODIVERSITY & GEODIVERSITY

There is little work within the Evidence Base to allow us to think this has been a priority for WBC.

Ecological Reports are not listed within Planning Documents, and the Public are not allowed to view them which means the work of the various Mammal Societies is inhibited. Relocation of species on sites underway is not monitored, and snakes and slowworms are just thrown over fences.

The recently arrived Ecologist is buried under the Planning Department rather than taking on a strategic role within the Organisation.

Despite the Climate Emergency being declared in Spring 2019 there has been little concentration on Nature Recovery or trying to ensure local Wildlife Corridors can still exist and operate.

The examples of Coley Farm and Sims Metal yard and their proximity to Ancient Woodlands is a classic example where it would have been possible to consider these aspects but the opportunity is lost as will the wildlife be lost.

Planning Committee Councillors never bring up these aspects in their debates just concentrating on making sure Humans are provided for. There are much better examples of Biodiversity & Geology Policies out in other plans.

CHPT 6 – DELIVERING HOUSING

SP12 – APPROACH TO HOUSING DELIVERY – for Newbury Sub-Area

I want to see clear figures for the Newbury Settlement in a table such as this taken from the Chichester Section 19 consultation which is happening at the same time as this one and has far better presentation for the residents to understand.

[CASE STUDY - The Tables of Housing Allocations are much easier to understand and are broken down into Sub Areas. And there are supporting lists for each sub-area to breakdown the Figures at a and b in the table below so that Town & Parish Councils can see what is already promised and planned for and what is clearly the extra requirement for their sub-area, and the OVERALL Number of new Households and Office/Industrial Space that will arrive within our Settlement and use the Infrastructure.](https://chichester.oc2.uk/document/45/366#d366)

<https://chichester.oc2.uk/document/45/366#d366>

13:15 Tue 21 Feb

 @ chichester.gov.uk
 99
 Chichester Local Plan
 37%

Housing and Economic Development Needs Assessment (April 2022)

Chapter 5: Housing

Policy H1 Meeting Housing Needs

The housing target for the plan area is to provide for at least 10,350 dwellings to be delivered in the period 2021-2039. The broad sources of supply anticipated in this Plan are as follows:

Category	Number of dwellings
Housing requirement for the full Plan Period (1 April 2021 to 31 March 2039)	10,350
Housing supply (1 April 2021 to 31 March 2039)	712
a. Completions 1 April 2021 - 31st March 2022	5,674
b. Known commitments (comprising)	2,210
Outstanding 2015 Local Plan ²⁸ and Site Allocation DPD 2014 – 2029 allocations ²⁹ without planning permission	100
Outstanding 'made' Neighbourhood Plan allocations without planning permission	3,364
Planning permissions as of 1 January 2023 ³⁰	
New Strategic Locations/Broad Location for Development and Allocations	3,210
c. Remaining figure without planning permission	3,096
Non-strategic Parish Housing Requirements	310
d. Remaining figure without planning permission	260
e. Windfall (small site allowance)	657
Total supply for the full Plan period (1 April 2021 to 31 March 2039) (-a+b+c+d+e)	10,359

The broad spatial distribution of this supply of housing across the different plan areas is indicated in the table below:

Sub-Area	Housing provision 2021-2039
East/West Corridor	8,717
Mainhood Peninsula	963
North of Plan Area	679
Plan Area Total	10,359

19 2021 – 2039: Proposed Submission (Regulation 19)

SP13 – SITE ALLOCATIONS FOR RESIDENTIAL & MIXED-USE DEVELOPMENT – in NEWBURY

Sites without Site Allocations and an absence of Policy include:

- NEW 1 – LRIE within the London Road Estates DEA (but NOT in the Brownfield Register) and earmarked for Office and Industrial use, yet it is unclear the status of some previously approved Residential Units on lands within, and Merchants Court which is now Residential and in the DEA. This land has the highly polluted Northbrook Stream running through it and partial culverting followed by un-culverted sections are clearly showing this pollution is build up and it runs into a SSSI.
- Gateway Plaza (2 brownfield sites and the latest spreadsheet states their Planning Applications have expired). They are within London Road Estates DEA but appears to be mixed with Residential, albeit there are no complete Maps anywhere for the development as illustrated in this video because it has no Site Allocation? https://www.youtube.com/watch?v=RCa_C7DGFr8 . There is no logical reason why these lands are not in the Site Allocations and given Policy to guide their development through to 2039.
- the Kennet Centre/Eagle Quarter redevelopment (Brownfield) which will probably go to appeal and something will happen there in the next 20 years. Ideal for Site Allocation with a Policy around it to determine the endless debates about Mix, Height, Density, Design, Provision of Public Open Space, Impact on the Conservation Area Analysis etc. etc.
- the Old Magistrates Court (brownfield) which is within the Kennet SSSI Buffer Zone. Not started and required Buffer Zones are compromised.

All these 4 above are also subject to Flood Risk of varying degrees so Policy in the DPD is very important again in terms of mix, density, height, design, and Environmental Impacts etc.

Likewise, some Sites which are already under construction should be included such as:

- the Sterling Gardens Residential Phase 2 as the 1st Phase has been fraught with problems and the new road is not yet finished or tested, the SuDS have not been signed off, and there is still no agreement to deal with the on-street parking outside neighbouring properties in Kings Road which

has been displaced. I would like to see a Site Allocation AND Policy for the Phase 2 Development which are separate blocks of flats.

- The Shaw 401 straddling the A339 North of Newbury- issues around the SuDS and future phases as development appears to have stopped on the Donnington Heights west-side. The Shaw Valley East-side has significant flood risk to parts of the site and the Cumulative Impact of Development on Flood Risk in the Catchment Area (CIOD OFRICA) may not have been assessed as there is no Methodology for doing this within the new SFRA Level 1 Addendum 1.
- The new Mayfield Point Mixed Development at Wash Common on the South-side between the College & the A339 which appears to be within the Settlement Boundary and has now gone to appeal.
- Sims Metal Management & J. Passey & Son Butchers, Turnpike Road/Waller Drive, Newbury- (brownfield and an old knacker's yard) not started and again Contamination & Flood Risk issues as the site includes the Stone Copse bourn which has a history of flooding (42 in Waller Drive the other side of the road). It has never been clear why it was not included in the Turnpike Estate DEA as to make it viable it will not deliver any Social Housing. Would be better filling the gaps in Industrial or Manufacturing land.
- Land adjoining the Phoenix Centre (brownfield)
- Bayer House and land to the rear of 1-15 Northbrook Street – (brownfield and salami sliced to avoid EIA). The Sites include the very polluted and partially culverted Northbrook Stream which runs underneath the site.

Nb.

The Map of Brownfield Sites is no longer visible, and we are just given a spreadsheet to try and visualise how they map together?

Finding Maps of the DEAs is difficult.

Given the comments above It almost appears as if someone has just forgotten to Allocate the Mixed Sites for Newbury within this Policy or most of them are on the too difficult pile which is precisely why they need Allocating and Policy behind them.

The number of missing Mixed and Brownfield Sites gives the whole Plan for Newbury a feeling of not being SOUND and probably not Justifiable in its current form. There will be a huge increase in Dwellings and Households within this Plan without identified local Employment land to provide jobs for those households which indicates lots of extra commuting without any major improvements within the Transport for Southeast Strategic Investment Plan to 2050.

LRIE & Gateway Plaza –

None of this is allocated in the Plan under any category, and as far as I can ascertain none has Planning Applications in date. All lies within the London Rd Estates DEA.

These 2 or 3 Sites total about 13 hectares with mixed development, mixed Landowners, and at various Risk of Flooding.

- Fluvial from the R. Kennet, and Canal overflow
- Fluvial from Lambourn Catchment and the polluted Northbrook Ordinary Watercourse
- Groundwater levels which are between the Surface and 0.25m below the Surface,
- Kennet & Avon Canal Overflow
- Incidents of Sewage overspill.

- And the majority of the Area is in the NE NNZ for R. Lambourn Catchment (source to Newbury).

Part of this much fought over area which is known as NEW1 – LRIE (WBC land in London Road Industrial estate) does NOT have a Site Allocation or development plan policy. It is a horrible polluting area which includes an old Landfill Site, the Newbury Wastewater Treatment Works, a Calor Gas Centre, and a Plant Hire business that washes very undesirable soils into the faulty drainage.

It has been rumbling on for 10 years without the basic Environmental Assessments taking place and this really is an opportunity to try and have proper Site Allocation within this Plan and some Policy which would direct its re-development in a modern Holistic way. This would enable:

- the pollution of the Northbrook to stop
- the malfunctioning sewage and surface water drainage to be rectified,
- the WwTW to be expanded to cope for Sandleford,
- the Flood Risk downstream and to the North in the Catchment where I live to be rectified,
- the correct Buffer Zones to be introduced for the SSSIs,
- projected Air Quality, Noise, Light, Hot Spots to be properly dealt with
- Nature-based solutions within a new Green/Blue Infrastructure Framework to be mapped and installed to gain Biodiversity
- And Highways volumes and drainage to be properly assessed.

We do not want to wait for an SPD – we want these Sites Allocated now with Policy

These Sites are part of the London Road Estates DEA, however the Policy for DEA at DM32 is not sufficiently robust to cover them and they should be Allocated Sites – separately or jointly whichever the wise Inspector feels is the best way to deal with them.

As there is a good deal of confusion over this rather large area right on my doorstep. As it currently poses more flood risk I was hoping that the Local Plan Review would include the Site(s) to give clarity on what high-level Policy would be in place to guide the work of development over a 20 year timescale. The avoidance of conducting holistic Flood Risk Assessment from ALL Sources and preparation of a holistic Surface Water Drainage Strategy with Thames Water cannot continue. The SFRA Level 2 Site Specific Analysis in Appendix B&C demands this is done under the Local Plan Review and it is a cop out not to include these Sites in this LPR.

SP14 – SITES FOR EASTERN AREA

No Comment

SP15 – SITES FOR NWD AONB

No Comment as all made under SP2

SP16 – SANDLEFORD STRATEGIC SITE

Despite the Appeal Decision I find this Site Allocation a very sad one given the amount of Sensitive Wildlife Sites that will be permanently impacted by these proposals. Had the Site come forward freshly in this plan or in the next couple of years it may have been rejected on Environmental, Biodiversity, and loss of Wildlife with species numbers degradation or elimination.

It is also sad to see that Warren Road – a completely unsuitable 4th Entrance/Exit Point onto the Andover Road for occupants of this huge site - is Mandated by this Policy for use by All Vehicles.

And this will open up the Gateway for the Norgate operated Donnington New Homes to bid for more Residential Housing on Greenfield Space completing the Urbanisation of the this Area between Newbury and Wash Water/Enborne Row. It puts the concept of wildlife corridors into disrepute as there will no nowhere left to go.

Others with more knowledge can argue detail of this Policy but suffice to say I would like this to be finite.

SP17 – NORTHEAST THATCHAM STRATEGIC SITE

No Comment apart from there is much Evidence missing for this Strategic Site and many many hours have been put in by Local Residents to give robust responses to this proposal.

SP18 – HOUSING TYPE & MIX

As well as addressing Accessible Housing this policy also needs to ensure a sufficient supply of Adapted Housing to cater for Older Adults with Dementia who require specific types of housing to cater for their incurable regressive brain disease along with a Carer either Family Unpaid Carer or paid Care Giver. I tried to find such Accommodation for 2 years and nothing Affordable was available. People are buying new properties and having fittings ripped out to accommodate elderly relatives and this is not sustainable development.

West Berks is a Dementia Friendly Council and within this plan there is no DM Policy to support this Approach unlike Milton Keynes which has a Dementia Friendly SPD.

SP19 – AFFORDABLE HOUSING

Existing Policy has failed. No Comment on whether this is more likely to succeed.

CHPT 7 – FOSTERING ECONOMIC GROWTH & SUPPORTING LOCAL COMMUNITIES

SP20 – STRATEGIC APPROACH TO EMPLOYMENT LAND

Needs to include Retail & Commercial Lands. Needs a Map of DEAs in the Evidence Base and Individual Maps in Appendix 4.

SP21 – SITES ALLOCATED FOR EMPLOYMENT LAND

As previously referenced. Needs to include the following sites:

- NEW 1 – LRIE – WBC Lands on the London Road Industrial Estate
- GATEWAY PLAZA sites
- KENNET CENTRE/ EAGLE QUARTER
- SITE FOR A NEW RETAIL PARK as identified on the Policies Map – Greenham

Need a MAP OF DEAs & need a MAP for Brownfield Sites to establish which will be Residential, which will be Mixed & which will be solely Employment.

SP21 – TOWN & DISTRICT CENTRES

Need a specific Policy for Newbury as the only MAJOR TOWN CENTRE

SP23 – TRANSPORT

The latest Draft Local Transport Plan 2024-2039 has only just been released for Consultation on the 8th February and consultation completes on 22nd March 2023. Another late issued Document which gives Parish & Town Councils little time to incorporate feedback into their Section 19 Consultations.

The Transport for Southeast SIP to 2050 provides little in the way of strategic improvements and the links to other major towns such as Basingstoke A339, A34 to Winchester & Oxford, A4 to Reading & Marlborough/Swindon are only scheduled for Safety upgrades. The A34 will not be upgraded to a Motorway and will continue to be a heavy freight route despite plans to move more freight to rail.

And the increases in Distribution & Logistics employment space at Thatcham Colthrop & Newbury Hambridge Lane will only lead to increases in HGVs and Vans along the A4 Corridor with inadequate radial routes out particularly to the South and West. There seems to be no attempt to look at a Distribution & Logistics Hub out near the M4 at Junction 13. And the Distribution Hub being created at Membury has no Highways plan behind it and only has B roads to reach it with no improvements included in Transport Plans.

And we need a bridge over the Railway at Thatcham to facilitate commuting from Thatcham to South Newbury, A339 to Basingstoke, and A34 to Winchester & Oxford without passing through Newbury.

SP24 – INFRASTRUCTURE REQUIREMENTS & DELIVERY

An incomplete document with no funding for Flood Alleviation Schemes for Newbury Clayhill and schemes to the North. No details on the upgrades that will be required to already failing drainage on the London Road Estates DEA and the area between the Southern banks of the River Lambourn and the A4 which nearly 200 properties at High RoFSW and sewage pollution with poo in back gardens.

The figures included for 8 Football pitches at £1m each are aspirational as the first one to be delivered will require at least £3.7m of Capital Funding.

CHPT 8 – NON-STRATEGIC SITE ALLOCATIONS – OUR PLACE BASED APPROACH

SITES ALLOCATED FOR RESIDENTIAL DEVELOPMENT: NEWBURY & THATCHAM AREA

Too many Newbury Sites that are already known about are not included and will not benefit from having Specific Policy. These include:

- Gateway Plaza on no- WBC Land – PAs expired but it will be redeveloped.
- Gateway Plaza on WBC Land.
- Old Magistrates Court – not started and within SSSI buffer zone.
- Kennet Centre/Eagle Quarter – planning refused but will be developed in the Plan timescale
- Phoenix Centre
- Sterling Gardens Phase 2
- Sims Metal Management (Old Passey Yard) land off Waller Drive
- Mayfield Centre
- Old Bayer 2 Sites

No Comments on rest of RSA Site Allocations

SITES ALLOCATED FOR EMPLOYMENT LAND

Too many Newbury Sites that are already known are not included and will not benefit from having Specific Policy for what will be significant sites. These include:

- NEW 1 or WBC Lands on LRIE – London Road Industrial Estate

- Gateway Plaza – both Sites - mixed
- Kennet Centre/ eagle Quarter- mixed
- Mayfield Centre - mixed

CHPT 9, 10, 11 & 12 – DEVELOPMENT MANAGEMENT POLICIES

I find these rather difficult to follow as they are not always logical under the headings they are under and I can quite understand why there is a huge turnover in Planning Officers. Developers & Planning Applicants either get round Policies or miss them in their presentation of their plans. The Checklists for Planning Applicants already needed updating and that need will be greater to make it easier for Planning Applicants to understand what Policies they need to comply with at Submission and Validation stage.

I do not intend to comment apart from the odd one below and I think that **Sustainable Drainage (SuDS)** must have a higher level Policy instead of being an SPD.

And I do think as a leading Tech Town and Area we may need a Policy around **Data Centres** which are highly resource hungry and would impact on Climate Change Targets.

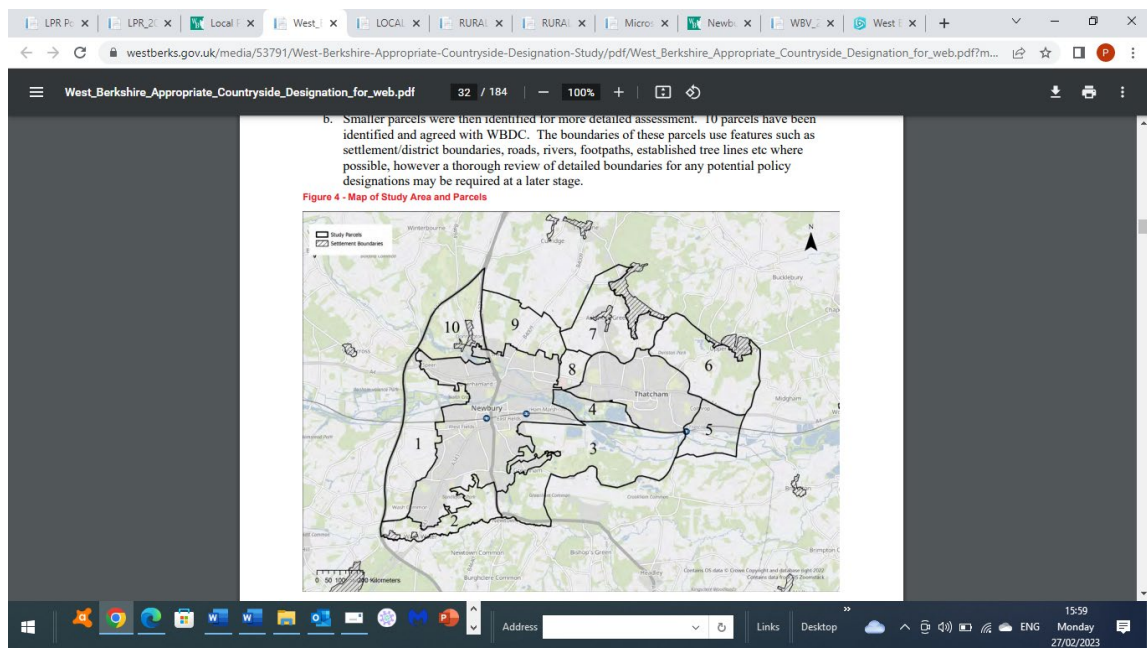
And I would like to see something specific in the Planning framework to support the **Dementia Friendly** status that West Berks has.

The LPR is not very clear on its Terminologies in relation to the AONB, Rural & Countryside, and this is very evident in the suite DM Policies as these are all over the place for the Spatial Areas, and not grouped logically for anyone trying to ensure a Rural/Countryside/AONB Planning Application is compliant.

DM1 – RESIDENTIAL DEVELOPMENT IN THE COUNTRYSIDE

There is nothing to protect the Extension of smaller Bungalows into large dwellings and as these are ideal for Rural families that wish to stay together or the elderly and disabled that wish to remain in the Countryside.

DM2 – SEPARATION OF SETTLEMENTS AROUND NEWBURY & THATCHAM



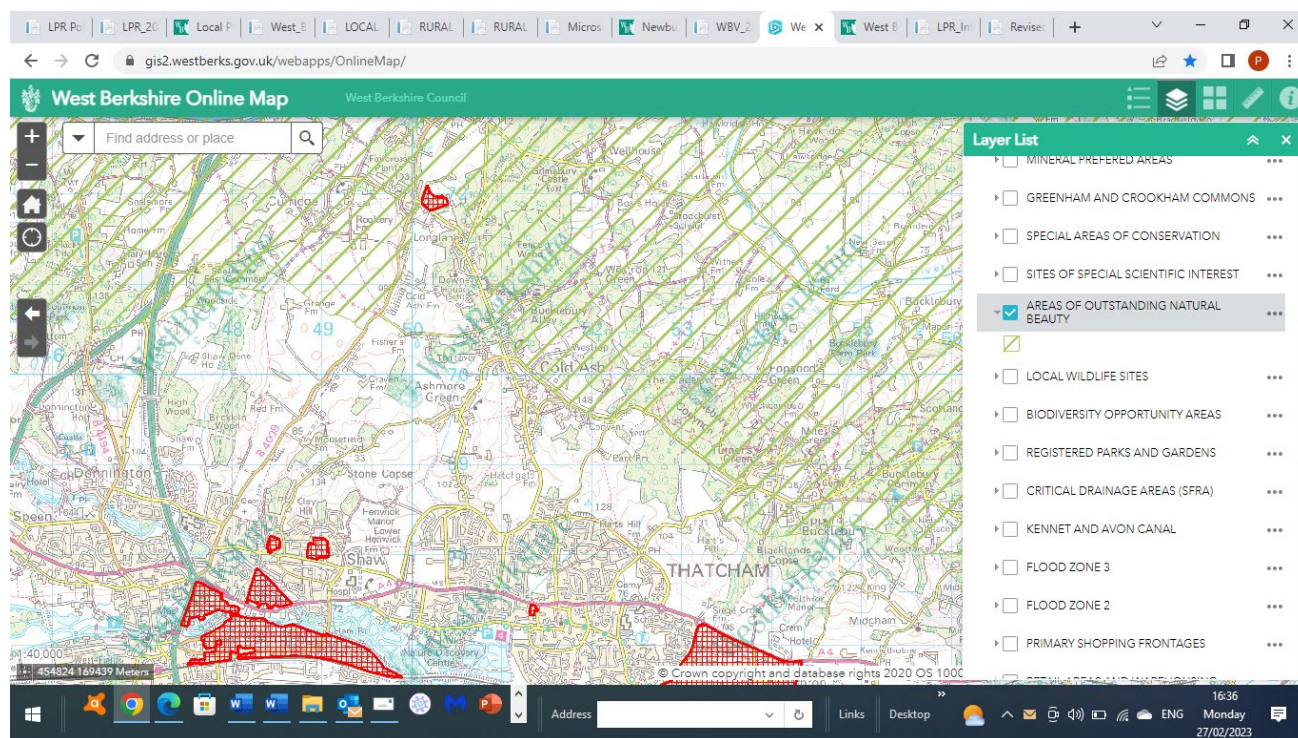
[https://westberks.gov.uk/media/53791/West-Berkshire-Appropriate-Countryside-Designation-Study/pdf/West Berkshire Appropriate Countryside Designation for web.pdf?m=638103394389630000](https://westberks.gov.uk/media/53791/West-Berkshire-Appropriate-Countryside-Designation-Study/pdf/West_Berkshire_Appropriate_Countryside_Designation_for_web.pdf?m=638103394389630000)

Policy DM2 relates to this Evidence Document and includes these Gaps:

- a. Land between Newbury and Donnington
- b. Land between Newbury and Enborne Row/Wash Water
- c. Land between Newbury and Thatcham
- d. Land between Thatcham and Cold Ash
- e. Land between Thatcham and Ashmore Green

It does not include a Gap between Newbury & Ashmore Green which would run along Stoney Lane and East to Long Lane. And it does not include a Gap between Newbury & Cold Ash - between B4009 & Stoney Lane.

By not having these Gap it will be possible for Developers to build out from Newbury North right up to the AONB, and if that is the intention of this Plan then that should be stated clearly in the Spatial Strategy.



The Conclusion that the Lands between Newbury North & Ashmore Green & Shaw- cum- Donnington – all part of Parcel 9 - does not provide an essential gap between settlements therefore a Green Gap/Wedge Designation is not recommended is incorrect. And it is obvious that the considerations of Green Gaps put into the North of Thatcham have not been consistently applied to North of Newbury. The North Newbury Urban sprawl will stretch for miles without designated Green Gaps, and the preservation of currently productive Agricultural & Food Producing lands has not been considered in the Assessment.

[https://westberks.gov.uk/media/53791/West-Berkshire-Appropriate-Countryside-Designation-Study/pdf/West Berkshire Appropriate Countryside Designation for web.pdf?m=638103394389630000](https://westberks.gov.uk/media/53791/West-Berkshire-Appropriate-Countryside-Designation-Study/pdf/West_Berkshire_Appropriate_Countryside_Designation_for_web.pdf?m=638103394389630000)

Document titled APPROPRIATE COUNTRYSIDE DESIGNATION STUDY has not been advised to Newbury Town Council and not come before NTC Planning Committee. None of our Elected Representatives have had the opportunity to comment on or give input into this Document before being published as part of the LPR Section 19 Submission. For this reason this Policy is **Not Sound**.

APPENDICIES

No time to review in Detail but a general comment is the lack of maps within documents and the lack of ability to pull together data for a Specific Spatial Area and important Sub Areas.

Appendix 1 – Monitoring & Delivery

The Monitoring Indicators Titles do not tie up with the Categorisations used within the Objectives or the LPR Chapters, therefore they feel illogical and will be difficult to track. However as each MI does list perceived relevant Policies it leads one to wonder why they were not better grouped within the Plan and the DMs appropriately numbered.

Appendix 2 – could include a symbol to show which of the Settlements are designated as Rural. See comment under Glossary of Terms below.

Appendix 4 – should include the Detailed Map for each of the listed DEA as they are not available on GIS and the Policies Map does not appear to be GIS enabled??

The **Glossary of Terms (GOT)** fails to include some frequently used terms such as:

- Rural -the list of those Designated should be included somewhere
- Countryside
- Heritage
- Green Gaps
- Designated Employment Areas -even though they have their own Appendix
- Residential Parking Zones – has own Appendix so should be in GOT
- Etc. etc.

OTHER MATTERS

CONSULTATION DOCUMENTS

https://www.westberks.gov.uk/media/53945/Proposed-Submission-Regulation-19-West-Berkshire-Local-Plan-Review-to-2039-Clean-Version/pdf/LPR_2022-2039_Proposed_Submission_for_consultation_20_Jan_2023_for_web.pdf?m=638096652954630000

The West Berkshire Local Plan Review 2022-2039 Proposed Submission as a Document:

- Is poorly presented in terms of collecting information together relating to one Area so that we can see the likely impacts and numbers of Residential Dwellings & Employment space that is likely to exist within our Area by 2039. Many Local Plans at this stage have much clearer information for a specific Area and as Newbury is the dominant Town and Urban Area it fails to have an SP Policy for itself and is only considered in the context of SP1 – the Spatial Strategy.
- Chichester District LPR has similar demographic and spatial strategy to West Berks, yet it gives much more respect to its main town (Chichester City) as part of the Spatial Area it is within.

<https://chichester.oc2.uk/document/45/459#d459>

CONSULTATION STATEMENT

https://www.westberks.gov.uk/media/53795/Proposed-Submission-LPR-Consultation-Statement/pdf/Consultation_Statement_-_Proposed_Submission_LPR_Dec_2022_v2.pdf?m=638084385899730000

The Consultation Statement, whilst detailed, does not appear to identify that during the Section 18 Consultation process or this Section 19 Consultation process there has **not been** a programme of Public Exhibitions in Areas of high impact. Such events are an opportunity for those that are not part of a Parish Council or are not Digitally enabled to participate. The Value of Story Boards and visual representations plus the opportunity to meet the Officers cannot be under estimated for the Ordinary Resident, including Parents, Environmental Studies School Pupils, Digitally Disabled, and the Elderly who are used to this type of Consultation

DUTY TO CO-OPERATE STATEMENT

https://www.westberks.gov.uk/media/53787/Duty-to-Cooperate-Statement-January-2023/pdf/LPR_Interim_DtC_Statement_January_2023.pdf?m=638086137283470000

The Duty to Co-operate does not include Town & Parish Councils however when it comes to Documents that are for a specific Town or Parish then Input and certainly better consideration during surveying and consultation would engender better relationships and quality.

EQUALITIES IMPACT ASSESSMENT

Inadequate for Key Sub Areas and Key Settlements and missing Sites that should be in the LPR.

HABITATS REGULATIONS ASSESSMENT

As a GI Framework is missing and these concentrate on International & National Designations there is no work on Local Nature Recovery Networks or complete Wildlife Corridors using non-designated Nature-based Public Open Space or Private Green Space.

POLICIES MAPS

The Policies Map is very detailed and small in scale. It does not appear to be GIS enabled and therefore does not have Post Code search facility.

The Area of Newbury is by its very nature quite crowded with colours and shaded areas which overlap. We need a detailed map for Newbury within a Sub-Area SP.

Had there been an SP Policy for Newbury and a Settlement Map - then residents would be able to comment more meaningfully on the contents of the maps and its implications for their lives.

STATEMENT OF THE REPRESENTATION PROCEDURE

The LPR 2022-2039 Section 19 Submission was not ready for Consultation and more time should have been taken to re-cut and re-format the Contents and Presentation before going to Consultation to enable meaningful Comment.

However, it is imperative that for ease of use afterwards that the Plan & Policies are restructured so that related Policies are collected together, and Planning Officers & Planning Applicants have a better chance of either complying and less opportunity to NOT comply.

SUSTAINABILITY APPRAISAL (SA)/ STRATEGIC ENVIRONMENTAL ASSESSMENT (SEA)

Paula Saunderson – WBC LPR 2022-2039 Section 19 Consultation Response

The Previous December 2020 Appraisals commented on how weak many of the current Plan Policies are. To strengthen Policies many now appear to be over-written and repeat information which is in the NPPF.

And you would have thought that the Consultants undertaking the Appraisals would have suggested a more logical Structuring of the Policies into groups where they relate to each other.

Not enough RSA & ESA Site Allocations for Newbury to make the plan Sound for Positive, Justified, and Effective.

None of the Key Mixed Sites are included such as NEW 1 – LRIE, Gateway Plaza, Kennet Centre/Eagle Quarter, Old Magistrates Court and without these Key Sites and any specific Policy around them I form the Opinion that this Section 19 Consultation Version of the LPR 2022-2039 is Not Sound on the Basis that it has not been Positively Prepared, is Not Justified, and Not Effective.

The Plan omits Brownfield Sites which has favoured the Sandleford Greenfield site and the Plan is not Justified without the Inclusion of the Brownfield Sites that are clearly going to start development within the next 20 years.

Without clear Data for the Newbury Settlement in terms of numbers of provision overall it is not an Effective Plan as it stands.

EVIDENCE BASE

Many Documents arrived late and caused a significant amount of extra work to Consultees who were already reviewing the Evidence Base prior to the slippage of dates for this Consultation. This has led to a view that the Plan has not been Positively Prepared.

TIMESCALES FOR PREPARATION AND SUBMISSION TO THE INSPECTOR

Overall the LPR 2022-2039 as it stands has been rushed, has significant gaps, and is not of a quality in terms of presentation that many other Local Planning Authority reviews are achieving. I do believe the Plan needs restructuring BEFORE Submission to the Inspector as I think they will be immediately frustrated by the poor presentation, lack of Sub Area detail and appraisal, and illogical grouping of Policies. If it were me I would throw it back.

END OF DOCUMENT

Signed:

Paula Ann Saunderson

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