

**Representations to  
Regulation 19 Consultation  
West Berkshire Local Plan  
Review to 2037**

Land east of Stoney Lane,  
Newbury

**Alice Drew**  
BSc (Hons) MSc MRTPI



Client: The Saunders Family

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**Southern Planning Practice Ltd**

Registered Office: Youngs Yard, Churchfields, Twyford, Winchester SO21 1NN  
Tel: 01962 715770 E-mail: [info@southernplanning.co.uk](mailto:info@southernplanning.co.uk) Website: [www.southernplanning.co.uk](http://www.southernplanning.co.uk)  
Registered in England and Wales No. 3862030

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**Appendix I – Representations to Regulation 18 Consultation**

## 1.0 [Introduction](#)

- 1.1 These representations have been prepared by Southern Planning Practice on behalf of The Saunders Family who own the land east of Stoney Lane, Newbury, in response to West Berkshire's Regulation 19 Local Plan Review to 2037 Consultation.
- 1.2 The site is located to the east of Stoney Lane which is in the north-eastern area of Newbury. The site is both closely related to the main urban areas of West Berkshire: Newbury and Thatcham.
- 1.3 A small section of southern part of the site was submitted to the West Berkshire Housing and Economic Land Availability Assessment (HELAA) (2020) and was considered under site CA9 to be suitable, available and achievable. The site, land east of Stoney Lane, as a whole has not been previously assessed by the Council for its development potential. However, it is of note that the land immediately to the south west of the site, Land at Coley Farm, has been allocated through the Local Plan for the development of circa 75 homes. In fact, this site has full planning permission for 75 homes, this is set out in further detail under Policy RSA3 below. It is understood that Cala Homes has recently purchased this site and construction will commence in the near future. It is also understood that the land to the north of the site has developer interest and it was considered under site CA8 of the HELAA.
- 1.4 Southern Planning Practice submitted representations on behalf of the Saunders Family to the Regulation 18 version of the draft Plan published in February 2021. In addition to the responses, the representations set out the opportunity presented by the site whilst demonstrating the site is available, suitably located and achievable, considered against the definitions contained in the NPPF 2021, that would help meet West Berkshire's housing need.
- 1.5 The comments made in the previous representations are still relevant and these representations seek to provide comments on the changes made to the Regulation 19 Plan.
- 1.6 All references in these representations are to the revised National Planning Policy Framework (NPPF) published on 20 July 2021.

## 2.0 [Response to Local Plan Review Vision and Objectives \(Section 3\) and Development Strategy \(Section 4\)](#)

- 2.1 As set out in the previous representations, we are supportive of West Berkshire's vision set out in paragraphs 3.1 to 3.4 of the Local Plan Review Consultation document. We strongly agree with the Council's priority to make available housing of different types, sizes, tenures and affordability. In addition to focusing most of the growth in the urban areas, the Council should look to all settlements and available land within the district in sustainable locations to help meet this priority.
- 2.2 We note the second strategic objective 'Housing' has been amended to be more specific and less broad. We support the provision of a range of sites to ensure the District's housing needs are met in appropriate and sustainable locations. Such an amendment may assist with the achievement and maintenance of a five-year housing land supply. As highlighted previously, through the allocation of a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements and to ensure they are not vulnerable to unsustainable, speculative development.
- 2.3 It is noted that paragraph 4.5 sets out that the Local Housing Need (LHN) for West Berkshire is 513 dwellings per annum, using a 2022 base date. This figure has not changed since the Regulation 18 consultation document which is hard to believe given two years has passed and the current housing crisis is worsening. This figure should be tested in the Local Plan Examination and due regard should be given to the standard method as well as the duty to cooperate.

### 3.0 [Response to Local Plan Policies](#)

3.1 The previous representations to the Local Plan Review Regulation 18 Consultation document section of the representations responded to Policies SP1, SP3, SP7, SP10, SP12, SP13 and RSA4. To avoid duplication, please refer to these previous representations included at Appendix I. This section provides comments on the changes made to the Draft Local Plan since the Regulation 18 document.

#### **Policy SP1**

3.2 No further comments to be made in addition to those made in response to the Regulation 18 consultation document, however it is emphasised that it is highly likely that strategic allocation will not deliver the number of homes that it was intended to as per the allocation in the adopted Local Plan for the reasons mentioned in the previous representations. Therefore, there is likely to be a shortfall in West Berkshire's housing land supply and the Council should be looking to allocate more sustainable sites for residential development to 'bridge' the gap and provide the homes the district needs.

#### **Policy SP3**

3.3 No additional comments.

#### **Policy SP7 and SP10**

3.4 We support the amendment to Policy SP7 which sets out that new development should reflect the National Design Guide (2021).

#### **Policy SP12**

3.5 We strongly object to the reduction in the number of homes to be delivered over the plan period. The housing provision has been reduced from 8,840 to 9,775 net additional homes to 8,721 to 9,146. This equates to a reduction of 119 – 629 homes over the plan period. Whilst we acknowledge that the target figure per annum 'does not constitute a ceiling or cap to development', as acknowledged previously the policy should be worded to set out

that the objectively assessed housing should be a minimum (our emphasis) figure in accordance with paragraph 11 b) of the National Planning Policy Framework and the Planning Practice Guidance.

- 3.6 It is noted at paragraph 6.23 that whilst the number of dwellings per annum over the plan period has reduced from 575 to 538, the number of dwellings which need to be found has increased from 1,661 homes to 1,809. In addition paragraph 6.28 of the consultation documents sets out that the Council's 5 year housing land supply has fallen from 7.67 years to 6.4 years. Such a dramatic fall in supply, whilst still above the 5 year requirement, indicates that further development sites should be allocated to bolster this supply.

### **Policy SP13**

- 3.7 As highlighted previously, there are a number of site allocations which are being carried forward from the current Local Plan. Whilst it is understandable that some sites will be included within the Local Plan Review, as they may have been forecast to be in the later years of the currently adopted Local Plan period, it is slightly concerning that main strategic allocation, Sandford Park is being carried forward together with five of the existing site allocations. It is noted that three of the previously propose allocations, equating to 280 dwellings have been removed. One of these sites was the Kennet Centre which we raised concerns about in our previous representations and we are pleased to see that the Council has now realised that the allocation does not have a realistic prospect of coming forward within the plan period. It is however still concerning to see the over reliance on the Sandford Park site.
- 3.8 Further, as set out in more detail in respect of Policy RS3, formerly RS4, we do not consider that given the advanced stage of this site in the planning process, that the Local Plan Review should be including it as an allocation.

### **Policy SP16**

- 3.9 No further comments – we still object to the proposed allocation due to its history and unrealistic prospect of coming forward in the plan period.



**Policy SP17**

- 3.10 Previous comments were not made on this allocation. Whilst it is appreciated that this allocation is strategic, it is very concerning how the housing provision of this site has reduced from 2,500 dwellings to 1,500 dwellings. It is unclear why this has happened – was the site and its constraints not fully assessed as part of the Regulation 18 consultation document. Such a dramatic reduction in housing provision highlights that there is a need for further, less complex, small-medium sites to be allocated through the Local Plan.

**Policy RSA3**

- 3.11 This policy was formerly 'RSA4' in the Regulation 18 Consultation Document and out comments on this still remain relevant. However it is noted that in the two years since the last Local Plan Review consultation, the full planning application which was pending consideration at this time has now been granted permission. Since this time, a Section 73 application has been submitted to vary conditions relating to the plans and hard landscaping, this application is pending consideration. A further application to discharge a pre-commencement condition has been approved. It is also understood that a housebuilder, namely Cala Homes, has now acquired the site and construction is imminent. As such, it is considered that the 'proposed allocation' is in fact retrospective which does not constitute good plan-making and we would therefore request that the allocation is now removed from the Local Plan Review.
- 3.12 If this allocation were to be deleted, as suggested, it will need to be replaced by an allocation of a similar size, or larger, to ensure the housing requirement is met. As highlighted in our previous representations, the approved site layout plan for land at Colely Farm provides links through to the land east of Stone Lane. It is considered that the land east of Stoney provides a logical extension to the previous allocation and is clearly located in an area which the Council considers appropriate for the development of new homes. As such, it should be considered for allocation within the Local Plan Review.

#### 4.0 [Response to Appendix 2 – Settlement Boundary Review](#)

- 4.1 We have no further comments on the Settlement Boundary Review, however our comments in relation to the Regulation 18 consultation still apply so please do read and consider these.
- 4.2 The settlement boundary change we suggested does not appear to have been incorporated into the appendix of the Regulation 19 Local Plan. Therefore we would like to take this opportunity to reinforce our comments which suggest the revision to the settlement boundary to include land east of Stoney Lane which would follow clearly defined boundaries and would result in a logical rounding of the urban area of Newbury. It would also be very fitting with the recently approved planning application at land at Colely Farm. The land east of Stoney Lane could be delivered in the short to medium term and would help to bolster the 5 year housing land supply of West Berkshire.



## 5.0 Conclusion

- 5.1 Section 3 of the NPPF sets out that the planning system should be genuinely plan-led. Paragraph 16 makes it clear that plans should be prepared in a way that is aspirational but deliverable.
- 5.2 Paragraph 35 of the NPPF sets out the four tests for plans to be considered 'sound'. One of these tests is that the plan should be 'positively prepared'. As currently drafted, particularly in light of the inclusion of allocations which already benefit from planning permission and the reduction in housing provision, the local plan is not positively prepared and is unlikely to assist the Government in its objective to significant boost the supply of new homes as it carries forward previous allocations which have failed to deliver and proposes new allocations which also may not deliver new homes or take a long time to provide new homes, when the need is now.
- 5.3 As highlighted throughout our representations to the Regulation 18 consultation, the council should be looking to allocate further sites of a range of sizes to provide a flexible, responsive and deliverable housing land supply. The land east of Stoney Lane is a suitable, sustainable site which, through allocation, would deliver homes within the first five years of the plan period.
- 5.4 Due regard should be given to the comments set out above as well as in the previous representations attached at Appendix I.

## **Appendix I – Representations to Regulation 18 Consultation**

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## 1.0 **INTRODUCTION**

- 1.1 These representations have been prepared by Southern Planning Practice on behalf of The Saunders Family who own the land east of Stoney Lane, Newbury, in response to West Berkshire's Regulation 18 Local Plan Review to 2037 Consultation.
- 1.2 The site is located to the east of Stoney Lane which is in the north-eastern area of Newbury. The site is both closely related to the main urban areas of West Berkshire: Newbury and Thatcham.
- 1.3 A small section of southern part of the site was submitted to the West Berkshire Housing and Economic Land Availability Assessment (HELAA) (2020) and was considered under site CA9 to be suitable, available and achievable. The site, land east of Stoney Lane, as a whole has not been previously assessed by the Council for its development potential. However, it is of note that the land immediately to the south west of the site, Land at Coley Farm, has been allocated through the Local Plan for the development of circa 75 homes. In fact, this site has outline planning permission for 75 homes and a full application is currently pending consideration, this is set out in further detail under Policy RSA4 below. It is also understood that the land to the north of the site has developer interest and it was considered under site CA8 of the HELAA.
- 1.4 These representations set out responses in respect of land east of Stoney Lane, to all relevant policies and sections of the Regulation 18 Consultation document. In addition to the responses, the representations set out the opportunity presented by the site whilst demonstrating the site is available, suitably located and achievable, considered against the definitions contained in the NPPF 2019, that would help meet West Berkshire's housing need.
- 1.5 Submitted together with these representations is a Site Location Plan which details the location and extent of the site. This plan also shows the allocated Land at Coley and the site to the north considered in the HELAA.
- 1.6 An Opportunities and Constraints plan has also been prepared and is submitted with these representations, it details the surrounding landscape designations and details indicative development areas, areas of open space, potential access points and connections to the wider area.

## **Newbury**

- 1.7 Newbury is the largest settlement within the West Berkshire District. The town provides a vast range of facilities and services together with significant employment provision. Newbury is very well connected to both the south and the north via the A34 and M4 which provide links to Winchester, Southampton, Oxford and Bristol. In addition to the strategic road network, Newbury is connected by rail to Reading, London, Bath and Bristol.
- 1.8 Thatcham, another major urban area in West Berkshire, is located to the east of Newbury. This area provides further facilities and services and is well connected to Newbury by both road, rail and bus links.
- 1.9 It is acknowledged that the Newbury and Thatcham urban area has been historically the focus for new development and the Local Plan Review confirms that it will remain the focus for the Local Plan Review.

## **The Site**

- 1.10 The site is located to the east of Stoney Lane and to the north of Waller Drive in the north-eastern section of Newbury. The site is located immediately to the north of the built up area of the town and adjoins the land at Coley Farm which is allocated under policy HSA3 in the adopted Local Plan and is proposed to be allocated again under policy RSA4 of the Local Plan Review. The site is therefore very well located to both existing and proposed residential development and is visually quite well contained.
- 1.11 The site is bound on all sides by a mix of hedgerow and trees. To the east of the site is Yates Copse which is an area of Ancient and Semi-Natural Woodland. There are no known environmental, heritage or landscape designations that apply to the site itself. The site is currently used for the grazing of cattle and therefore does not have a high ecological value.
- 1.12 The site is of an irregular shape which provides an opportunity, not a constraint. One of the sites accesses is on Waller Drive which is very sub-urban in nature and the second access to the site is off Stoney Lane which has slightly more of a rural feel, however there is residential development located all along the west of this lane up to the access point.



- 1.13 A small stream runs north-south through a section of the site; however, the site is not identified as being in an area of flood risk on the Environment Agency's flood risk map. The stream could be sensitively incorporated and enhanced through new residential development on the site.
- 1.14 The site extends to approximately 6.43 hectares and therefore it would be capable of accommodating circa 115-150 homes at a density appropriate to the existing built form and the surrounding area. The Opportunities and Constraints Plan submitted with these representations demonstrates how the site could be developed to provide an appropriate sustainable development.
- 1.15 The site is a suitable location for development adjacent to the existing urban area of Newbury. It would constitute a logical, sustainable extension to the town and is available for development now. The site is owned by one family and therefore there are no constraints regarding land ownership.

## **2.0 RESPONSE TO LOCAL PLAN REVIEW VISION AND OBJECTIVES (SECTION 3) AND DEVELOPMENT STRATEGY (SECTION 4)**

- 2.1 We are supportive of West Berkshire's vision set out in paragraphs 3.1 to 3.4 of the Local Plan Review Consultation document. We strongly agree with the Council's priority to make available housing of different types, sizes, tenures and affordability. In addition to focusing most of the growth in the urban areas, the Council should look to all settlements and available land within the district in sustainable locations to help meet this priority.
- 2.2 In order to have a robust five-year land supply, the council should look to all settlement tiers in the hierarchy to deliver homes through a range of small, medium and strategic sites. By allocating a range of sites, the Council will be able to maintain a stable housing land supply enabling the delivery of homes throughout the plan period to meet the identified local requirements and to ensure they are not vulnerable to unsustainable, speculative development.
- 2.3 We agree that the 11 strategic objectives are all-encompassing. With regards to strategic objective 2, whilst we agree that the identified housing need should be met across the District up to the end of the plan period, we consider that in light of the contents of paragraph 59 of the NPPF, which refers to the Government's objective of significantly boosting the supply of homes, the Council should be more ambitious and plan for the objectively assessed housing need as a minimum. As per the Planning Practice Guidance (PPG) (Paragraph: 001 Reference ID: 68-001-20190722), the standard method for calculating local housing need provides a **minimum** (our emphasis) number of homes to be planned for. It clearly sets out that authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach. We do not believe that there are an exceptional circumstances which would justify an alternative approach in West Berkshire.
- 2.4 Indeed, in order for the Local Plan Review to meet the 'positively prepared' test of soundness as required by paragraph 35 a) of the National Planning Policy Framework (NPPF), the Local Plan Review must:

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

- 2.5 Strategic Objective 5 looks to enhance the vitality and viability of town, district and local centres in West Berkshire. Land to the east of Stoney Lane would provide a significant addition to the population of Newbury which would help to achieve this objective. The allocation of the site would also contribute to meeting several of the Plan's strategic objectives.

### **3.0 RESPONSE TO LOCAL PLAN POLICIES**

- 3.1 This section of the representations responds to Policies SP1, SP3, SP7, SP10, SP12, SP13 and RSA4 of the Local Plan Review Regulation 18 Consultation document.

#### **Policy SP1**

- 3.2 We support the Council's approach to splitting the district into three spatial areas, given the vast differences between need and constraints in each area. It is acknowledged that Newbury will be a focus for housing development, and we encourage this approach. We appreciate Sandford Park (Policy SP16) is one of the biggest allocations in the Local Plan Review, however we note that the Council have twice now refused planning permission for residential development on the site. It is understood that an appeal has recently been submitted to get an independent view from the Planning Inspectorate on the proposed development.
- 3.3 Given, the above, it is considered that the strategic allocation will not deliver the number of homes that it was intended to as per the allocation in the adopted Local Plan. In light of this, there is likely to be a shortfall in West Berkshire's housing land supply, therefore we believe that the Council should be looking to allocate more sustainable sites for residential development to 'bridge' the gap and provide the homes the district needs.

#### **Policy SP3**

- 3.4 Policy SP3 builds on the spatial strategy set out in Policy SP1. We support the Council's approach to new development and emphasise that in addition to focusing growth in the key urban areas, the Council should also look to a range of settlements which can accommodate sustainable, proportional growth.
- 3.5 Newbury is a highly sustainable settlement with a range of facilities and services together with excellent transport links. It is therefore capable of accommodating a significant amount of housing over the plan period. Whilst Policy SP3 sets out that the urban areas will be the prime focus for growth over the plan period and some sites have been allocated in and around the town, we believe that further sites need to come forward to provide a larger population to support the longevity of the town centre and Newbury's facilities and services. The allocation

of land east of Stoney Lane would contribute a noteworthy population which would provide additional footfall and a valuable contribution to Newbury's facilities and services.

### **Policy SP7 and SP10**

- 3.6 We support the design principles set out in Policy SP7 and can confirm that any future residential development on land east of Stoney Lane would ensure these principles are incorporated.
- 3.7 The allocation of the site would strengthen the sense of place in this area of Newbury. Together with the land at Coley Farm, the site could provide a comprehensive development which would create a distinctive place. This approach would be in accordance with the recent NPPF consultation (January 2020) which focuses on place-making. The opportunities and constraints plan indicatively shows how the two sites would seamlessly integrate. The site is in a sustainable location and is of a scale which could deliver a high-quality landscape-led development with many public benefits. One key benefit the site could offer is the provision and strengthening of the Green Infrastructure in the area. The site could provide a large area of public open space together with creating links to the Copse to the east and the new residential development proposed at Coley Farm to the south west.

### **Policy SP12**

- 3.8 Paragraph 11 of the National Planning Policy Framework (2019) states that Local Plans should positively seek opportunities to meet the development needs of their area - as a minimum – but also be sufficiently flexible to adapt to rapid change as well as any needs that cannot be met within neighbouring areas. This stance is also reiterated in the Planning Policy Guidance.
- 3.9 Policy SP12 sets out that provision will be made for 8,840 to 9,775 net additional homes in West Berkshire for the period 1 April 2020 to 31 March 2037; 520– 575 dwellings per annum. It goes on to confirm that the figure of 575 dwellings per annum does not constitute a ceiling or cap to development. We are supportive of this approach, however, we believe the policy should be worded to set out that the objectively assessed housing should be a **minimum** (our

emphasis) figure in accordance with paragraph 11 b) of the National Planning Policy Framework and the Planning Practice Guidance.

- 3.10 In addition to West Berkshire's Housing need, the Local Plan Review should look to firstly be flexible to adapt to rapid change and secondly help to meet unmet need arising from neighbouring areas. West Berkshire District falls within the Thames Valley area and therefore should look to help accommodate any unmet need which is arising from other Local Planning Authorities in this area.
- 3.11 Under the August 2020 proposed standard method, West Berkshire's housing need increased from 513 homes per annum (calculated under the original 2018 standard method) to 692 homes per annum. The latest standard method (December 2020) has now reduced West Berkshire's objectively assessed housing need to the original figure of 513 homes per annum. Whilst the housing need for West Berkshire has not changed, the housing need for Reading Borough Council has significantly increased. The 2018 standard method set out an objectively assessed need of 649 whilst the latest December 2020 method has increased this to 876 dwellings per annum. This figure results in an additional 227 dwellings per annum. Therefore, in accordance with paragraph 11 of the NPPF, and the duty to cooperate as set out in paragraph 24 of the NPPF, West Berkshire and other local planning authorities within the Thames Valley area should look to help accommodate some of Reading Borough's needs and the unmet needs arising from any other neighbouring authorities in the area.

### **Policy SP13**

- 3.12 It is pertinent to note the number of site allocations which are being carried forward from the current Local Plan. Whilst it is understandable that some sites will be included within the Local Plan Review, as they may have been forecast to be in the later years of the currently adopted Local Plan period, it is slightly concerning that main strategic allocation, Sandleford Park is being carried forward together with six of the existing site allocations. In fact, the Local Plan Review only proposes to allocate three new sites. These sites include a large strategic site at North East Thatcham, the redevelopment of the Kennet Centre and a small site for 10 dwellings on land adjoining new road.
- 3.13 Sandleford Park has been allocated since 2006 yet but to date is yet to deliver any new homes.



- 3.14 In 2006, Winchester City Council allocated a city site centre known as Silver Hill for redevelopment. However, due to the complexities involved in bringing such sites forward, this allocation has not progressed. It is considered that the same is likely to occur with the proposed allocation of the Kennet Centre which is likely to require the assembly of multiple landownerships before a viable scheme can be progressed.
- 3.15 The proposed allocation of another strategic allocation plus the allocation of the Kennet Centre and the re-allocation of Sandleford Park results in an “all your eggs in one basket” approach is likely to result in a plan which has not been positively prepared and is unlikely to deliver the identified requirement.
- 3.16 We consider that the council should be less reliant on major strategic allocations and look to allocate a range of additional small, medium and large sites to provide a more flexible, responsive and deliverable range of allocations. Such an approach is encouraged at Paragraph 68 of the National Planning Policy Framework which acknowledges that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and are often built-out relatively quickly.
- 3.17 By allocating more sites for housing development, the Council will bolster their housing land supply. Through the allocation of sites which link to existing allocations, the Council will achieve comprehensive development which will be far more beneficial, particularly around the urban areas, opposed to piecemeal development. We therefore encourage the Council to review their site allocations in line with their spatial strategy and together with the most recent objectively assessed housing need to ensure they are planning for the right homes in the right places over the plan period and beyond.

### **Policy SP16**

- 3.18 We object to the proposed allocation of Sandleford Park (Policy SP16). This site has been allocated since 2006, yet the Council has refused planning permission for its residential development twice. It is therefore considered that the site should not be considered deliverable and hence should not form part of the Council’s proposed housing land supply

**Policy RSA4**

- 3.19 The land to the south west of the site, land at Coley Farm, is allocated for the development of 75 dwellings in the Local Plan Review. The site is also currently allocated in the adopted Local Plan under policy HSA3. An online planning history search has revealed that outline planning permission for 75 dwellings was permitted in May 2016 and an application for full planning permission was submitted in March 2020. This application was presented at the November 2020 committee and was recommended for approval by Officers, however the minutes of the committee meeting were not published at the time of writing.
- 3.20 We note that the site layout plan for the 2020 application provides opportunities for links to the land east of Stoney Lane. There are two obvious access points to the site, one to the north and one to east.
- 3.21 In light of the approval on land at Coley Farm and links that is provides to the land east of Stoney Lane, it is considered that the land east of Stoney provides a logical extension to the previous allocation and is clearly located in an area which the Council considers appropriate for the development of new homes

#### **4.0 Response to Appendix 3 – Settlement Boundary Review**

- 4.1 We understand that the Local Plan Review is looking to review the existing settlement boundaries in the district through a landscape-led approach. Appendix 3 sets out how the council intend to do this.
- 4.2 We agree that when reviewing the boundary for any given settlement, the council should look to its landscape evidence to assess which areas should be included and which should be excluded from the settlement boundary. We encourage the Council to review settlement boundaries to include suitable and sustainable sites for residential development and other development needs within the District. A previous settlement boundary review included the land at Coley Farm to facilitate its allocation.
- 4.3 With regards to the land east of Stoney Lane, the site is not located in a sensitive landscape designation and it is very well related to existing and future development. It is therefore considered that the principle of its inclusion for residential development in the revised settlement boundary for Newbury is accepted. It is key to note that the southern section, including one of the sites accesses onto Waller Drive is located within the existing settlement boundary of Newbury.
- 4.4 The revision to the settlement boundary to include land east of Stoney Lane would follow clearly defined boundaries and would result in a logical rounding of the urban area of Newbury. Whilst the site is currently countryside, it is very well located to the existing built up area of Newbury and is surrounded by existing and future residential development.

## 5.0 **CONCLUSION**

- 5.1 Paragraph 15 of the NPPF makes it clear that plans should be prepared in a way that is aspirational but deliverable
- 5.2 It is considered that as currently drafted, the emerging local plan is not positively prepared and is unlikely to assist the Government in its objective to significant boost the supply of new homes as it carries forward previous allocations which have failed to deliver and proposes new allocations which also may not deliver new homes or take a long time to provide new homes, when the need is now.
- 5.3 To remedy this deficiency, it is considered that the council should allocate further sites of varying size to provide a flexible, responsive and deliverable housing land supply. In this respect, we would point out the suitability of the land east of Stoney Lane
- 5.4 In accordance with the definition of 'deliverable' within the National Planning Policy Framework (2019), the site is available for development now, it is a suitable and sustainable location for future residential development and it is achievable with a realistic prospect that housing will be delivered on site within five years following its allocation.
- 5.5 The opportunities and constraints plan demonstrates how the site could be delivered to provide a landscape-led residential development. The plan details the potential development area together with open space, links to green infrastructure together with links to the wider area.
- 5.6 In conclusion, as demonstrated throughout these representations, the land east of Stoney Lane is available, suitable and achievable and would make a positive contribution to help meet West Berkshire's housing need, in particular the housing need for Newbury. The site could also potentially contribute to meeting unmet need arising from Reading Borough.