



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

**Ref:**

*(For official use only)*

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

This form has two parts:

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

**PART A: Your Details**

*Please note the following:*

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:	Mr	Mr
First Name:*	Atul	Huw
Last Name:*	Hindocha	Williams
Job title <i>(where relevant):</i>	Director	Director
Organisation <i>(where relevant):</i>	Prosper Infinity Ltd	Iver Consulting Ltd
Address* <i>Please include postcode:</i>	Magnolia House, 9 Magnolia Dene, Hazlemere Bucks HP15 7QE	26 Barnes Way Iver Bucks SL0 9LZ
Email address:*	[REDACTED]	[REDACTED]
Telephone number:	[REDACTED]	[REDACTED]

\*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):	Prosper Infinity Ltd
---	----------------------

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

Section/paragraph:	6 Delivering Housing
Policy:	
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

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

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

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

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

Please give reasons for your answer:

<ul style="list-style-type: none"> <li>- <i>NPPF clearly states Brownfield sites to be brought forward for development prior to the release of greenfield sites</i></li> <li>- <i>Thatcham has been identified for strategic development with a major greenfield release. Brownfield sites have been failed to be reviewed, and should be brought forward prior to the release of greenfield sites in Thatcham</i></li> <li>- <i>Former Newbury Leisure Park is a 4.25 acre redundant brownfield site, in a residential area</i></li> <li>- <i>It is already developed land since 1980s with a commercial building of 37,500 sqft, and residential dwellings called Moorstream Cottages of 3,300 sqft. The commercial building has become redundant as a leisure facility (3 operators have gone into administration over 9 years) and has been derelict since 2021. It attracts vandalism, crime, and demands time from the emergency services.</i></li> <li>- <i>An FRA has been produced which outlines a strategy to overcome flood plain issues which exist on 25% of the site.</i></li> <li>- <i>The site is in a sustainable location suitable for residential development.</i></li> <li>- <i>The site is immediately available for development</i></li> <li>- <i>See attached correspondence which includes the following</i></li> <li>- <i>Existing Site Plan</i></li> <li>- <i>Proposed Scheme which is mixture of C2 and C3 use</i></li> <li>- <i>Non technical summary of the FRA</i></li> <li>- <i>Letter to Planning Policy Manager dated 1<sup>st</sup> March 23, following up on representations made in Feb 2021</i></li> <li>-</li> </ul>
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### 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

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

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

#### 6 Delivering Housing

Priority should be given to brownfield sites before release of greenfield sites

### 5. Independent Examination

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

Yes

No

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

The use of brownfield sites prior to greenfield release should be a fundamental objective of the local plan which needs to be addressed. We would therefore wish to have a seat at the examination.

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

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

<b>Signature</b>		<b>Date</b>	<b>3<sup>rd</sup> March 2023</b>
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Title:	Mr	Mr
First Name:*	Atul	Huw
Last Name:*	Hindochoa	Williams
Job title (where relevant):	Director	Director
Organisation (where relevant):	Prosper Infinity Ltd	Iver Consulting Ltd
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Your name or organisation (and client if you are an agent):	Prosper Infinity Ltd
---	----------------------

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

Section/paragraph:	
Policy:	Policy SP12 – Approach to housing delivery
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

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

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

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

NPPF criteria	Yes	No
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<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		√
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<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		√

Please give reasons for your answer:

<ul style="list-style-type: none"> <li>- <i>NPPF clearly states Brownfield sites to be brought forward for development prior to the release of greenfield sites</i></li> <li>- <i>Thatcham has been identified for strategic development with a major greenfield release. Brownfield sites have been failed to be reviewed, and should be brought forward prior to the release of greenfield sites in Thatcham</i></li> <li>- <i>Former Newbury Leisure Park is a 4.25 acre redundant brownfield site, in a residential area</i></li> <li>- <i>It is already developed land since 1980s with a commercial building of 37,500 sqft, and residential dwellings called Moorstream Cottages of 3,300 sqft. The commercial building has become redundant as a leisure facility (3 operators have gone into administration over 9 years) and has been derelict since 2021. It attracts vandalism, crime, and demands time from the emergency services.</i></li> <li>- <i>An FRA has been produced which outlines a strategy to overcome flood plain issues which exist on 25% of the site.</i></li> <li>- <i>The site is in a sustainable location suitable for residential development.</i></li> <li>- <i>The site is immediately available for development</i></li> <li>- <i>See attached correspondence which includes the following</i></li> <li>- <i>Existing Site Plan</i></li> <li>- <i>Proposed Scheme which is mixture of C2 and C3 use</i></li> <li>- <i>Non technical summary of the FRA</i></li> <li>- <i>Letter to Planning Policy Manager dated 1<sup>st</sup> March 23, following up on representations made in Feb 2021</i></li> <li>-</li> </ul>
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### 3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

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

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#### **Policy SP12**

*Priority should be given to the release of brownfield sites for residential development prior to greenfield releases being made*

### 5. Independent Examination

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

Yes

No

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

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

*Please tick all that apply:*

*Tick*

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

Section/paragraph:	
Policy:	Policy SP13 – Site allocated for residential and mixed use development in Newbury and Thatcham
Appendix:	
Policies Map:	
Other:	

### 1. Legally Compliant

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

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

Yes

No

*Please give reasons for your answer:*

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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

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

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#### **Policy SP 13**

*Former Newbury Leisure Park site, Lower Way, Thatcham to be added for up to 90 residential units*

### 5. Independent Examination

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

Yes

No

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

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

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

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#### **Policy SP17**

The total number of residential dwellings of 1500 proposed should be offset by plots being delivered from brownfield sites located in Thatcham.

### 5. Independent Examination

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

Yes

No

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

The use of brownfield sites prior to greenfield release should be a fundamental objective of the local plan which needs to be addressed. We would therefore wish to have a seat at the examination.

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

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

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



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

**Ref:**

*(For official use only)*

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

This form has two parts:

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

**PART A: Your Details**

*Please note the following:*

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

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:	Mr	Mr
First Name:*	Atul	Huw
Last Name:*	Hindocha	Williams
Job title (where relevant):	Director	Director
Organisation (where relevant):	Prosper Infinity Ltd	Iver Consulting Ltd
Address* <i>Please include postcode:</i>	Magnolia House, 9 Magnolia Dene, Hazlemere Bucks HP15 7QE	26 Barnes Way Iver Bucks SL0 9LZ
Email address:*	[REDACTED]	[REDACTED]
Telephone number:	[REDACTED]	[REDACTED]

\*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):	Prosper Infinity Ltd
---	----------------------

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

Section/paragraph:	
Policy:	
Appendix:	Appendix 2 Settlement boundary Review
Policies Map:	
Other:	

### 1. Legally Compliant

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

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

Yes

No

*Please give reasons for your answer:*

## 2. Soundness

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

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

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

Please tick all that apply:

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

Please give reasons for your answer:

<ul style="list-style-type: none"> <li>- <i>NPPF clearly states Brownfield sites to be brought forward for development prior to the release of greenfield sites</i></li> <li>- <i>Thatcham has been identified for strategic development with a major greenfield release. Brownfield sites have been failed to be reviewed, and should be brought forward prior to the release of greenfield sites in Thatcham</i></li> <li>- <i>Former Newbury Leisure Park is a 4.25 acre redundant brownfield site, in a residential area</i></li> <li>- <i>It is already developed land since 1980s with a commercial building of 37,500 sqft, and residential dwellings called Moorstream Cottages of 3,300 sqft. The commercial building has become redundant as a leisure facility (3 operators have gone into administration over 9 years) and has been derelict since 2021. It attracts vandalism, crime, and demands time from the emergency services.</i></li> <li>- <i>An FRA has been produced which outlines a strategy to overcome flood plain issues which exist on 25% of the site.</i></li> <li>- <i>The site is in a sustainable location suitable for residential development.</i></li> <li>- <i>The site is immediately available for development</i></li> <li>- <i>See attached correspondence which includes the following</i></li> <li>- <i>Existing Site Plan</i></li> <li>- <i>Proposed Scheme which is mixture of C2 and C3 use</i></li> <li>- <i>Non technical summary of the FRA</i></li> <li>- <i>Letter to Planning Policy Manager dated 1<sup>st</sup> March 23, following up on representations made in Feb 2021</i></li> <li>-</li> </ul>
---



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

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

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

Yes

No

Please give reasons for your answer:

### 4. Proposed Changes

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

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

#### **Appendix 2 Settlement boundary Review**

The settlement boundary that runs along Lower Way should be amended to include the former Newbury Leisure Park site and Moorstream Cottages as this is previously developed land

### 5. Independent Examination

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

Yes

No

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

*The use of brownfield sites prior to greenfield release should be a fundamental objective of the local plan which needs to be addressed. We would therefore wish to have a seat at the examination.*

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

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

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



Magnolia House  
Magnolia Dene  
Hazlemere, Bucks  
HP15 7QE

Dear [REDACTED]  
Planning Policy Manager  
West Berks Council  
Market St, Newbury. RG14 5LD

1<sup>st</sup> March 2023

**Ref : Newbury Leisure Park**

Dear [REDACTED]

### **Background**

I have owned the above property for several years when it was operating as a Ten Pin Bowling centre with ancillary uses such as soft play/refreshments. Between 2012 and 2020, there have been 3 leisure operators that have gone into administration whilst running their businesses at this site, demonstrating that both national leisure chains and private businesses cannot successfully operate a leisure business at this site. Sadly, as a result of the Pandemic, the operator never re-opened after the enforced closures. Despite being marketed since 2021 and being available, it has since remained vacant. The premises are now falling into a poor state of repair and the number of break ins is only on the increase.

During 2020 and 2021, I was in constant dialogue with the Economic Development Team at West Berks, and they agreed there is no economic viability of this site for leisure use. In fact, the Economic Development Team discussed the demise of this site with the Economic Development Board, and concluded that they would support a planning application for residential and or use for the Care sector.

In response to approaches received from the planning policy team, submissions highlighting the site's availability were made to the draft plan consultation(2021), the site promotion register, and the Brownfield Register in 2021. Despite this I am disappointed over the lack of engagement with the Council to bring forward this site forward for re-development and that the site should be allocated for residential /care home development in the forthcoming review of the Local Plan. This is based on the following;

#### **1. Re-use of brownfield sites prior to the release of greenfield land for development**

It is a requirement of all Local Authority's to seek the re-use of brownfield sites prior to the release of green field sites for residential development. This is particularly so when sites such as the former Newbury Leisure Park are redundant and available for development.

Significant releases on greenfield sites are being proposed in the Thatcham area which should only occur once all potential brownfield opportunities have been utilised. With the omission of our site the Council have failed to do this and should review their allocations.

#### **2. Settlement Boundary**

At present the settlement boundary runs along Lower Way, thereby excluding a development site from the built-up area. We do not understand the reasoning behind this as it is clearly a developed site. We therefore request that the settlement boundary is amended in accordance with Plan A to include our site within the settlement boundary.

### **3. Suitability of development**

The overall site extends to 4.25 acres. It is in a sustainable location with easy access to local amenities such as schools, shops, on the main bus routes and open space.

Within the site are the former Bowling Centre/Soft Play centre which is some 37,500 sq.ft. Also located on the site are Moorstream Cottages which are 3,300 sq.ft. To support the Bowling Centre the site has car parking for 180 cars on hard standing tarmac. Significant development is therefore already accommodated on site.

The site falls partly within Flood Zones 2 and 3. To address this concern we commissioned Floodline Consultants to provide a Flood Risk Assessment, a copy of their Non-Technical Summary is attached. It concluded that, taking into account the flood zones, a minimum of 2 acres of land was capable for development. This could be increased further following a detailed hydrological assessment. It is our view that the site is therefore capable of accommodating a care home and ancillary residential development or 80 to 100 residential units.

### **4. Demand for current use**

Since the premises became vacant (Jan 2021) we have been marketing the premises to find an alternative occupier or use for the site. During this period, we have had no enquiries to use the premises for leisure use. The trend for such uses as ten pin bowling centres has been for them to locate in town centres as part of a mixed-use scheme which is not able to be achieved in this location. Further detailed commentary on this can be provided by the joint agents Haslams and Re-made UK

### **5. Need to accommodate demand for C2 (care) accommodation/ housing in Thatcham**

Since the COVID pandemic the care sector has been under close scrutiny, with numerous sub-standard homes being closed. This has been combined with an increase in demand for care provision due to an increase in life expectancy and our ageing population increasing. This has led to more modern care homes being built, often providing a range of accommodation to reflect the varying needs of the elderly. Never has there been a stronger case for catering for this demand.

The former Newbury Leisure Park provides a perfect opportunity to part meet this need for the Newbury area. It is a brownfield site and is of a size which can accommodate a care home of up to 90 beds, with ancillary or open residential units in the grounds. Safe access can be provided to the highway network and wonderful views over the lakes can be offered to the residents.

### **6. Concluding remarks**

The former Newbury Leisure Park, given it's a redundant brownfield site should be given priority by West Berkshire District Council to enable it to be re-developed prior to the release of greenfield sites. We would therefore ask the Council, in reviewing its current Local Plan, to;

- Amend the Settlement boundary of Thatcham to include the former Newbury Leisure Park within the built-up area.
- Allocate the site for residential/care development

The NPPF states "local planning authorities, and other plan-making bodies, should take a proactive role in identifying and helping to bring forward land that may be suitable for meeting development needs"

I hope the above points are taken on board by the Council. Should you wish to discuss then my Development Consultant, Huw Williams and myself would be delighted to meet officers at the Council to discuss how we can take this site forward for development.

Yours sincerely,

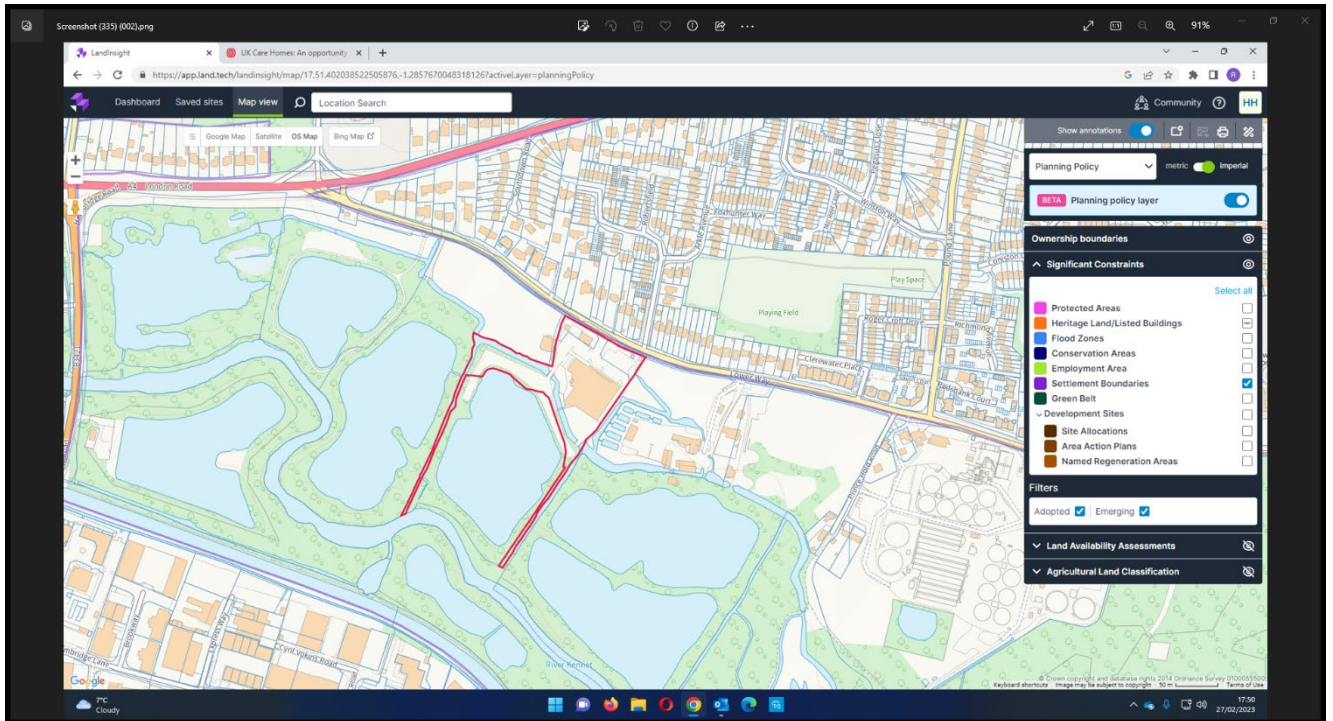


Atul Hindocha

## Plan A – Settlement Boundary and Title Plan of Newbury Leisure Park

The purple line shows the settlement boundary along Lower Way.



The red line shows the title plan of Newbury Leisure Park; recommendation to amend the settlement boundary to include Newbury Leisure Park, as this is a previously developed site.





Former Site called Newbury Leisure Park and  
Moorstream Cottages  
Lower Way, Thatcham. Berks RG19 3AL and RG19 £TL



Report No:	Date:
<b>FCL/600/P01</b>	<b>17 Jan 2023</b>
Project:	
<p><b>NEWBURY LEISURE PARK, LOWER WAY, BERKSHIRE, RG19 3AL</b></p> <p><b>Preliminary Flood Risk Assessment Report</b></p> <p><b>Part 1: Non-Technical Summary</b></p>	
Client:	
<b>Prosper Infinity Limited</b>	
	
Revision:	Status:
<b>A</b>	<b>Issue 2</b>
<p style="text-align: center;">   <i>Building with nature®</i>            Floodline Consulting Ltd, The Annex, Warren Wood, Pyle Hill,            Woking, Surrey, GU22 0SR, UK         </p>	
<p><a href="http://www.floodlineconsulting.co.uk">www.floodlineconsulting.co.uk</a></p>	

## Document Control Sheet

### Report Details

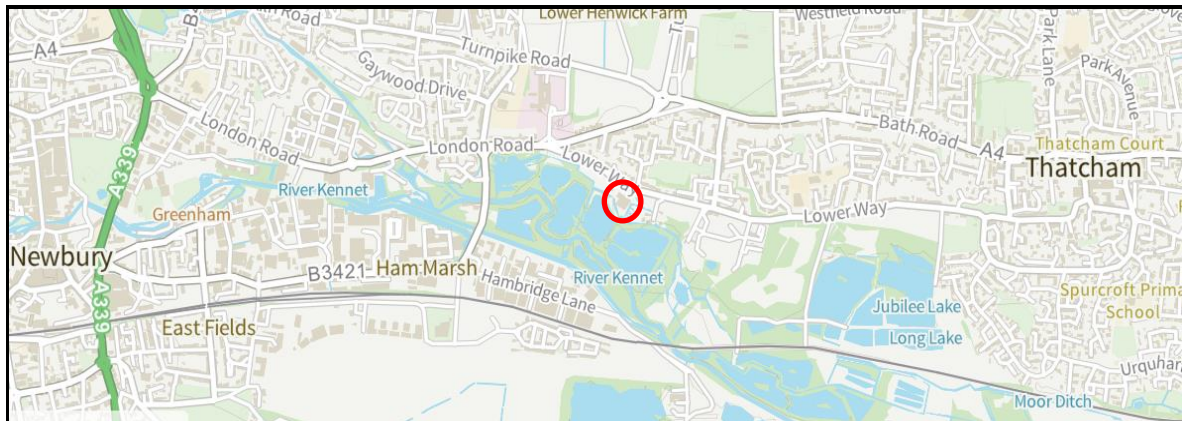
<i>Project Title</i>	Newbury Leisure Park, Lower Way, Berkshire, RG19 3AL
<i>Report Title</i>	Part 1: Non-Technical Summary
<i>Revision</i>	A
<i>Status</i>	Issue 1
<i>Control Date</i>	17 January 2023
<i>Authorised for Issue</i>	Faruk Pekbeken, BEng CEng MICE Technical Director

### Distribution

<i>Organisation</i>	<i>Contact</i>	<i>Copies</i>
Prosper Infinity Limited	Atul Hindocha	1(pdf)
Re-Made UK	Huw Williams	1(pdf)
Floodline Consulting	Justin Meredith	1(pdf)

# 1 Non-Technical Summary

Floodline Consulting Ltd was commissioned by Prosper Infinity Limited to produce a Preliminary Flood Risk Assessment (PFRA) report to support an assessment for a potential residential, residential care accommodation or industrial development at a brownfield site located in an urban setting south of Lower Way, Thatcham, as shown in **Figure 01** below.



**Figure 01:** Site Location Plan

The brownfield site is currently unoccupied and contains a former leisure centre building which provided bowling and other sporting activities. Its entrance is set 38m back from the edge of the road. A separate two-storey residential building (Moorstream Cottage) is located at the boundary with Lower Way. The site is served by extensive parking and loading areas to its north and west with vehicular access to the waterfront at the south.

The overall site covers approximately 1.72ha (17,200 m<sup>2</sup>) with the footprint of the leisure park building and the Moorstream Residential Cottage covering 3,437m<sup>2</sup> and 307m<sup>2</sup> for respectively.

The study undertaken assesses all aspects of flood risk associated with a development, the potential impacts any development may have on people and property elsewhere within the catchment, and possible mitigation measures that may be required to ensure the development is safe for its lifetime in the event of a flood.

## Development Considerations

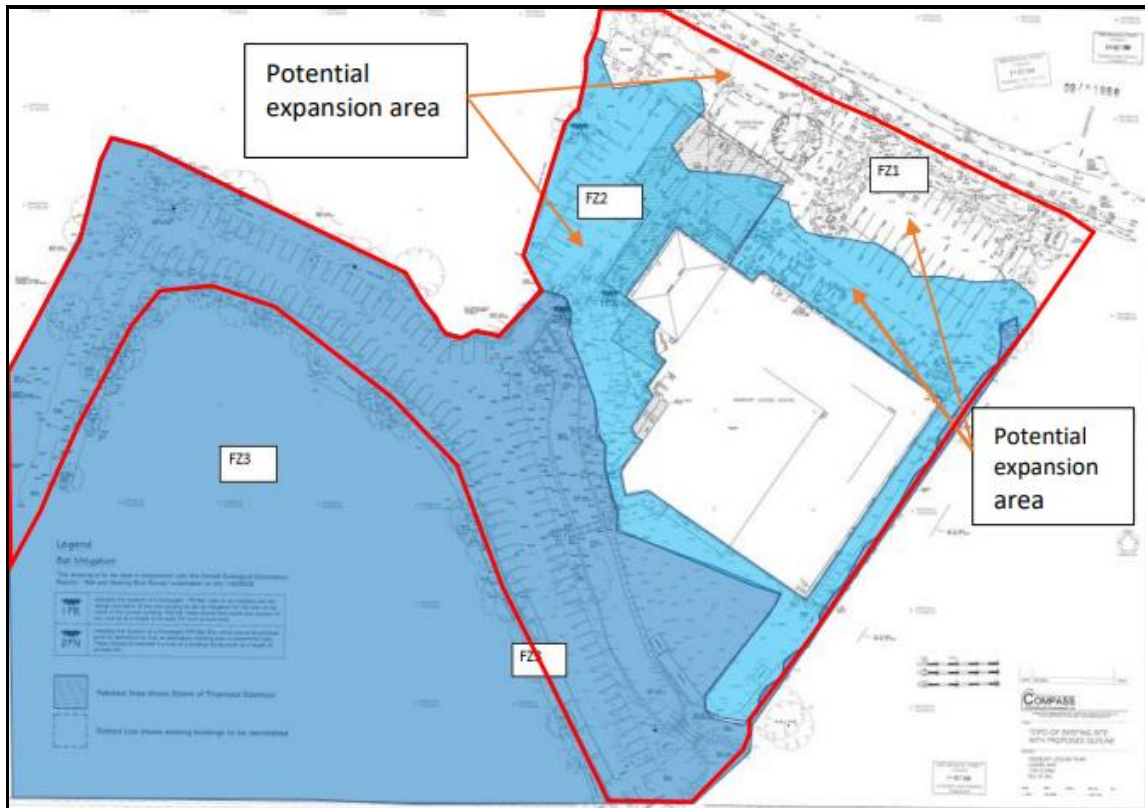
A flood risk assessment is required for any site shown on the Environment Agency's indicative flood plain map as being located in or near an area at risk of flooding from rivers, seas or other sources. The primary purpose of a study is to ensure all future development is safe for its lifetime whether residential or commercial taking climate change into consideration.

**Figure 02** below, taken from the EA indicative 'Flood Map for Planning' portal, shows the overall site as being located in Flood Zones 1, 2 and 3. From this map;

- Approximately 1,700m<sup>2</sup> of the site is in Flood Zone 1 – Low Risk (lowest flood risk classification in England where risk of flooding is 0.1% or less in any given year).



- Approximately 6,300m<sup>2</sup> is in Flood Zone 2 – Medium Risk (where risk of flooding is between 0.1% and 1% in any given year).
- The remaining areas are in Flood Zone 3 – High Risk (where risk of flooding is greater than 1% in any given year)



**Figure 02:** Indicative Floodplain Map – FCL Interpolation showing Flood Categorisation Extents FZ1, 2 and 3

As there is an existing substantial building at the site located within Flood Zone 2 it will have an impact on floodwater extents at the site. Any future development having the same footprint as the existing leisure building will therefore, 'not make flooding worse elsewhere'. If the footprint of a new development in FZ2 is reduced, it would be considered a betterment as more space is allocated within the red line boundary for floodwater attenuation.

A further betterment would be provided if the majority of a proposed development is located further north in Flood Zone 1 and car parking allocation is moved south to Flood Zone 2.

### **Residential and Care Accommodation Development**

The principle of residential use is already established at the brownfield site with 'Moorstream Cottage' in an area with the lowest flood risk classification. The existing disused Leisure Centre building is located wholly in Flood Zone 2 and, subject to securing the necessary planning consent, could provide additional residential accommodation to replace the commercial use.

Any proposals will need to demonstrate that flood risk is not made worse elsewhere and safe access and egress is provided, from FZ2 to FZ1, for the design storm event with allowance for climate change, for the 100 year lifetime of the residential development. This could be provided in the form of a short

length of raised footpath that would allow floodwater to pass underneath if the new building were to be wholly located in FZ2. Should the building footprint extend into FZ1, there would be no requirement for a raised access. There is no development proposed within FZ3 at this stage.

As development is not proposed in Flood Zone 3, there is approximately 8,000 m<sup>2</sup> of site located in Flood Zone 1 and Flood Zone 2 considered for development. Further analysis and hydraulic modelling is required to determine the precise flood zone boundaries which may increase the development potential of the site outside FZ3.

### **Commercial Development**

Commercial light industrial development is classed as a ‘less vulnerable’ development. There are fewer restrictions for this type of development in FZ2 for a minimum design life of 75 years. Any proposals will need to demonstrate that flood risk is not made worse elsewhere. Safe access and egress is a lesser issue as commercial facilities can remain closed in the event of a flood warning thus avoiding risk to staff.

### **Development Conditions in Flood Risk Zones**

Guidance is provided to Local Planning Authorities with regard to determining planning applications within each Flood Zone as tabled below:

Flood Zone	Development Requirements
Flood Zone 1	Lowest flood risk categorisation. All forms of development may be permitted. A sequential test may be required if any forms of flood risk are identified in this zone
Flood Zone 2	Low to Medium flood risk. Development may be permitted subject to a site-specific FRA and passing the sequential test
Flood Zone 3a	Floodplain - High Risk - Development may be permitted subject to a site specific FRA and passing the sequential test and, for residential, the exception test

The recent publication of the Planning Practice Guidance notes and the National Planning Policy Framework confirms a sequential test analysis will be required to support any planning application in a flood zone to ensure all potential sources are considered and mitigated. Exceptions test would be required should any development extend to FZ3a but there is no intention to develop areas beyond FZ2 at this site at this time.

### **Flooding from Other sources**

Flood risk from other sources have been considered and results listed below;

Type of Flooding	Risk Level
Tidal	None – Site is safe
Fluvial	Low to medium for proposed development area
Surface Water	Exceedance route mitigation - Low and safe



Groundwater	Low and safe
Foul Sewer	None – site is safe
Reservoir	None – site is safe
Hazard to People & Flood Water Evacuation Plan	Mitigation with raised footpaths from FZ2 to FZ1

The site is in an EA flood warning and alert area. Future residents will be encouraged to register for warnings and a Flood Warning and Evacuation Plan will provide additional safety guidance for residents.

A separate SuDS sustainable drainage strategy report will be required to ensure the development is not at risk of flooding from any potential source, including surface water, and does not increase flooding to the site or elsewhere.

#### Environment Agency Data

The EA have provided their model 1D data for following a request for their hydraulic data centred on this site. The model received only provided ‘in-channel’ flood levels, which are located over 500m to the west of the application site, upstream and represents best available data at this time. Essentially the flood zones do not consider the topography and elevations of the surrounding floodplain and will require further analysis to establish the accurate flood return events for the site.

This EA data suggests the site is susceptible to flooding in the more frequent flood events thus placing a significant proportion of the site in Flood Zone 3. This is inconsistent with the EA’s indicative flood map for planning data which more accurately assesses the site to be located in Flood Zone 1, 2 and 3.

There is conflicting evidence with regard to the 2007, 2017 and indicative EA ‘Flood Map for Planning’ hydraulic model outputs and further investigation is recommended to establish more accurate flood model data. These model outputs set the essential benchmark for potential development options for the site and we recommend further analysis and modelling to determine the actual flood extents at the site as this would be beneficial for establishing developable zones.

Any development would need meet the requirements of the NPPF and its Planning Practice Guidance notes. It would need to be acceptable and sustainable in terms of flood risk, the principle of sustainable development, drainage and other planning considerations.

## 2 Limitations & Copyright

### Limitations

Floodline Consulting has prepared this Report for the sole use of the Client in accordance with the Agreement under which our services were performed. No other warranty, expressed or implied, is made as to the professional advice included in this Report or any other services provided by us. This Report may not be relied upon by any other party without the prior and express written agreement of Floodline. The conclusions and recommendations contained in this Report are based upon information provided by others and upon the assumption that all relevant information has been provided by those parties from whom it has been requested. Information obtained from third parties has not been independently verified by Floodline, unless otherwise stated in the Report.

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# Newbury Lakeside Park

Draft Scheme 1

90 Bed Care Home, plus 9 x 3 storey town houses

