



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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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:	C/O agent	■
First Name:*	C/O agent	■■■■
Last Name:*	C/O agent	■■■■
Job title (where relevant):	C/O agent	■■■■■■■■■■
Organisation (where relevant):	C/O agent	■■■■
Address* Please include postcode:	C/O agent	■■■■■■■■■■
Email address:*	C/O agent	■■■■■■■■■■■■■■■■■■■■
Telephone number:	C/O agent	■■■■■■■■■■

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

Section/paragraph:	Section 8 – Sites Allocated for residential development: North Wessex Downs AONB Section 6 – Delivering Housing
Policy:	Policy DM37 – Equestrian and Horseracing Industry
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
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		
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
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		X
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		

Please give reasons for your answer:

Please see representation letter

3. Complies with the Duty to Co-operate

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

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

Yes

No

Please give reasons for your answer:

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.

Please see representation letter

5. Independent Examination

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

Yes No

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

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

6. Notification of Progress of the Local Plan Review

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

Please tick all that apply:

Tick

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

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

Signature		Date	03.03.2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.



Planning Policy
West Berkshire Council
Council Offices
Market Street
Newbury
RG14 5LD



2 March 2023
CONFIDENTIAL

Dear Sir/Madam,

WINDSOR HOUSE PADDOCKS, LAMBOURN (LAM5) – WEST BERKSHIRE LOCAL PLAN REVIEW PROPOSED SUBMISSION (REGULATION 19) CONSULTATION


We write on behalf of [REDACTED], [REDACTED] respect of West Berkshire Council's (WBC) Local Plan Review Proposed Submission (Regulation 19) document which is currently out for consultation.

Our client has been promoting the Windsor House Large Paddock site for some time and maintains that the site represents a suitable site for housing development and should be allocated in the emerging Local Plan. We have also been promoting the site through the Lambourn Neighbourhood Development Plan. In summary, these representations highlight that:

- The entire large paddock site should be allocated for housing and included within the settlement boundary of Lambourn. This is because as previously highlighted, the surface and groundwater flooding experienced by the site can be mitigated for;
- An interim development proposal for large confines of the site which are not subject to flood risk could be brought forward in the short to medium term, prior to more detailed mitigation measures in order bring forward the rest of the site;
- The current allocations in the area do not take into account previous under-delivery of housing sites in Lambourn;
- The site provides a unique opportunity to deliver affordable housing for local needs, such as those working in the racehorse industry; and
- The lack of flexibility within Policy DM37 for discontinued horseracing uses and recognition of the wider role that appropriate housing has to play in supporting the local economy and thus the industry as a whole.

We also have concerns relating to the housing numbers proposed for the North Wessex Downs AONB and Lambourn in particular as we believe both are too low.





All of the above, either individually or cumulatively mean that the draft Regulation 19 Plan is not 'sound' as it is not justified or effective as required by the National Planning Policy Framework (NPPF) (2021).

Our key concerns with the Draft Regulation 19 Plan and our suggested amendments are outlined below.

Section 8 - Sites allocated for residential development: North Wessex Downs AONB

The council should reconsider their selection of housing allocations within Lambourn and include the Windsor House Paddocks site (LAM5).

This site would perform better environmentally speaking than the two allocated sites in Lambourn, due to its well contained position in terms of surrounding patterns of development and positioning further away from the Lambourn River SSSI/SAC. Localised surface water flooding issues can be successfully mitigated against in the short term through locating dwellings on portions of the site which are not susceptible to this localised flooding, of which a significant number of dwellings could still be accommodated. In the medium to long term, well established mitigation measures can be put in place which could unlock greater proportions of the site to bring forward more housing, which would be valuable in delivering upon housing need in the area on a well contained site close to the village centre.


We would urge the council to revisit the 2014 Housing Allocations DPD representations for this site, where detailed work was undertaken by our client's Flood Risk Consultants including engagement with Stuart Clarke, West Berkshire Flood Engineer, where a variety of options have been discussed in resolving these flooding issues. It is clear from these representations, that the issue of flooding can be overcome.

It is also disappointing to see that two previously undelivered sites have been rolled over to the Regulation 19 Plan without the addition of any other allocations in the village to appropriately take into account previous under delivery. These two sites were allocated in the Housing Site Allocations DPD in 2017 and remain undelivered more than 5 years later. Land adjoining Lynch Lane, which is allocated for 60 units, has not received planning permission since its allocation and whilst Land at Newbury Road (allocated for 5 units) received planning permission in September 2021, this permission has yet to be implemented and will lapse in under a years' time.

There is no immediate indication that these sites will be delivered in the near term, therefore they are not addressing current and growing housing needs in the area. This is exacerbated by that fact that West Berkshire's 5 year housing supply has decreased from 7.34 years in 2021 to 6.4 years in 2022, as reported by the council's Annual Monitoring Reports.

There is a short term solution to delivering housing on the Windsor House Paddocks site.

It is also recognised that Lambourn has a thriving racehorse training industry that must have continued support. The importance of this industry is recognised in Policy DM37. With many people employed in the equestrian industry, often on low pay, there is an acute need to provide market and affordable housing. Our client is exploring the ability to accommodate a number of units to be made available specifically for local people working within the industry. A development on the site could therefore provide for a local specific need that may not otherwise be met by the other allocations, complying with the spirit of Policy DM37 which affords support to this industry which is intrinsically linked to the vitality of this rural service centre.



As has previously been put forward, the Paddocks have not been used for racehorse training purposes for a number of years and the land is therefore underutilised.

This has occurred for practical reasons in terms of providing ample space for the training of these horses and other associated buildings required, as well as logistical issues associated with transporting yearlings in the village to the training uses in Upper Lambourn, along busier roads in the centre of the village. The Paddocks are therefore becoming increasingly disconnected from the cluster of racehorse training uses and facilities located in Upper Lambourn and is unlikely to be used again for these purposes due to this.

The provision of housing on the site would contribute towards the continuing vitality of the settlement as well as maintaining an onsite link to the race horing industry by providing affordable housing for workers in this field.

In addition to this, the development of the site could also provide benefits to the local area that the other sites could not, including:

- Opportunities to make improvements to the surface water and groundwater flooding concerns within the local area (through onsite improvements as well as S106 contributions to offsite improvements);
- Improved footways in the immediate vicinity of the site to enhance accessibility to the village centre;
- Improved sight lines at the Crowle Road/Baydon Road Junction; and
- Provision of a bus layby to facilitate safe and efficient school drop offs.

The Windsor House Paddocks Site (LAM5) should be included as a site allocation in the Draft Regulation 19 Plan. The site performs well and can provide tangible benefits to the village in the short term, through the provision of affordable housing units for workers in the racehorse industry.

Section 6 – Delivering Housing

We have criticisms of the draft Local Plan in relation to the residual requirement for the North Wessex Downs AONB area, and the balance of this area requirement planned for in Lambourn. These criticisms mean that the draft Local Plan is not sound as it does not properly meet the housing requirements for the District, and is not the most appropriate strategy based on the evidence available.

Lambourn Housing Allocation

Given the Lambourn's relative size compared to Hungerford and Pangbourne, the other two Rural Services Centres in West Berkshire, and the unique requirements to provide housing for the racehorse training industry, the number of houses identified in the village is disproportionately low.

Hungerford has a population of circa 5,500, Lambourn circa 4,000, and Pangbourne 3,000 people. Despite Lambourn being only 30% smaller in population terms than Hungerford, Hungerford's housing allocation of over twice as high as the housing numbers identified for Lambourn. Lambourn's proposed allocation is more akin to Pangbourne's, even though the



settlement is 25% smaller in population terms than Lambourn. This is only one indication of what a proportionate housing allocation should but is telling.

To add to this, it is recognised that Lambourn has a thriving racehorse training industry that it must continue to support. With many people employed in the equestrian industry, often on low pay, there is an acute need to provide market and affordable housing. This housing need is not present in Hungerford and Pangbourne.

For the reasons set out above, more land for housing should be identified in Lambourn. The Windsor Paddocks site could provide between up to 50 houses. This would take the overall housing numbers proposed for Lambourn over the next 12 years up to 115-130, which is a more proportionate given the size and unique needs of the town.

Policy DM37

As mentioned above, Policy DM37 recognises the importance of the horseracing industry within the North Wessex Downs AONB. However, this policy should recognise the many different ways of supporting the industry outside of the establishment of new equestrian facilities by affording policy support to the re-use of inappropriate facilities which have ceased use and are unlikely to be re-used in the future. The policy recognises that permanent fragmentation should be resisted but does not provide support for positive solutions where this fragmentation has already occurred, such is the case with the Windsor House Paddocks site and its disconnection with the many uses which have located to Upper Lambourn, which offer a more suitable location and range of facilities for the equestrian industry.

The Policy should allow some flexibility for former land used by the equestrian industry which is unlikely to be used again in the future (be it unsuitable location, facilities or fragmentation with other similar uses which inhibits the operation) to be reused in ways that still support the industry. One such instance would be the re-use of such land for housing in appropriate locations, subject to a percentage of the housing being reserved for local workers in the industry. As highlighted housing has an important role to play in maintaining the vitality of Lambourn as a rural service centre linked to the racehorse industry.

If you wish to discuss any of the comments made in further detail please do not hesitate to contact us.

Yours faithfully