

**From:** [REDACTED]  
**To:** [REDACTED]  
**Subject:** My Response Submissions to the LPR 2023-2041 Main Mods Consultation  
**Date:** 30 January 2025 15:59:19  
**Attachments:** [REDACTED]  
**Importance:** High

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**This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.**

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Dear PP,

Here is my front details and my Word Doc submissions which should be easy to cut and paste into your Consultation Submissions.

I assume I will receive the usual auto response and this will acknowledge receipt and I will be included.

Thank you for all your help and here is to the next onward stage of **this** Local Plan.

Best wishes,

Paula

Ms Paula Ann Sanderson, [REDACTED]

[REDACTED]



**West Berkshire Local Plan Review 2022-2039 (LPR)  
 Consultation on Proposed Main Modifications  
 (6 December 2024 – 31 January 2025)**

Representation Form

**Ref:**  
 (For official use only)

|  |   |
|--|---|
| <b>Please complete and return this form:</b> | <b>By email:</b> [REDACTED]   |
|  | <b>By post:</b> Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD |
| <b>Return by:</b>                            | <b>11:59pm on Friday 31 January 2025</b>  |

Please read the **Guidance Note**, available on the Council’s website <https://www.westberks.gov.uk/lpr-proposed-main-modifications>, before making your representations.

This form has two parts:  
 PART A – Your details  
 PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

| <b><u>PART A: Your details</u></b>  |                 |                                    |
|---|-----------------|------------------------------------|
| <i>Please note the following:</i>   |                 |                                    |
| <ul style="list-style-type: none"> <li><i>We cannot register your representation without your details.</i></li> <li><i>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</i></li> </ul> |                 |                                    |
|   | 1. Your details | 2. Agent’s details (if applicable) |
| Title   | Ms              |                                    |
| First Name*   | Paula           |                                    |
| Last Name*  | Saunderson      |                                    |
| Job title<br><i>(where relevant)</i>  | [REDACTED]      |                                    |
| Organisation<br><i>(where relevant)</i>   |                 |                                    |
| Address*<br><i>Please include postcode</i>  | [REDACTED]      |                                    |
| Email address*  | [REDACTED]      |                                    |
| Telephone number  | [REDACTED]      |                                    |
| Consultee ID<br><i>(if known)</i>   | [REDACTED]      |                                    |

## **PART B – Your representation(s)**

All comments made at previous stages of the LPR have been taken into account by the Inspector and there is no need to resubmit these. Publication of the proposed Main Modifications is a regulatory stage and any representations made should relate specifically to the legal compliance and soundness of the proposed Main Modifications and should not relate to parts of the Plan that are not proposed to be modified.

**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

|  |                      |
|--|----------------------|
| Your name or organisation<br>(and client if you are an agent): | Paula Ann Saunderson |
|--|----------------------|

### **Proposed Main Modifications and Proposed Changes to the Policies Map**

**1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:**

|   |  |
|---|--|
| Document name                                   | <b>Schedule of Main Modifications</b>  |
| Modification/Change reference number (MM / PMC) | <b>Permission from Paula A to Submit in an attached Word Doc sent via email with this form. Word doc titled 2025.01.22 - PAS replies to LPR Main Mods Consultation</b> |

**2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:**  
(please tick/mark 'X' one answer for a and one for b)

- a) **Legally compliant**                      Yes                       No
- b) **Sound**                                      Yes                                       No

*Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'*

**If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:**  
(please tick/mark 'X' all that apply)

|  |          |
|--|----------|
| <b>Positively Prepared:</b> The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements. |          |
| <b>Justified:</b> the LPR should be the most appropriate strategy, when considered against the reasonable alternatives   | <b>x</b> |
| <b>Effective:</b> the LPR should be deliverable  |          |
| <b>Consistent with national policy:</b> the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF                |          |

**3. If you have answered ‘No’ to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.**

*You will need to say why this change will make the Local Plan Review 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.*

Some of the Approach taken by the Plan and the words within several Main Modifications are Not Justified as we can find No Evidence by comparison to many other Local Plans that **Exclusion from Allocation of Any Sites within Settlement Boundaries** is a justified approach to take and it is forcing Key Sites and Major PDL Sites out of this Plan and into WINDFALL. The Justifications for not wanting this Approach to be in Plan Policy are contained within my responses to the relevant Main Modifications. Removal of this Policy would make the Plan Justifiable.

The various Main Modifications which mention Neighbourhood Development Plans seem to contradict each other, are confusing and far from clear for the various types of Urban Areas and Villages in the Settlement Hierarchy. We need better clarity and then it will likely all be Justifiable.

**Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)**

**4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?**  
*(Please be as precise as possible)*

|   |                |
|---|----------------|
| Page number   | Whole document |
| Paragraph number  |                |
| Comments:   |                |
| It does not seem to be a very thorough piece of work and I was not aware during Reg 19 that we had the ability to respond to the SA/SAE so I am unable to make comparisons. |                |



## SCHEDULE OF PROPOSED MAIN MODIFICATIONS (MM) - NOVEMBER 2024

### Main Modifications words in Blue

### Paula Saunderson comments/consultation reply in black

**Nb. My replies on most Main Mods relate to Newbury**, being Newbury Area including a Town Centre, Out of Centre Areas, and Out of Town using the definitions in the Glossary of Terms within the NPPF.

It will be repetitive as some of the points within the Main Modifications are repeated several times.

### MM1 14 Paragraph 4.11 - Chapter 4 Development Strategy: Our Place Based Approach

Insert additional text to the end of paragraph 4.11 as follows: ‘Future growth for **Newbury** and Thatcham has been set in the context of a **long-term Vision** developed for both towns, ensuring growth is **sustainable** in the longer term.’

There is currently no real Long-Term Vision for the Newbury Area. Using the NPPF Definitions I refer to the Town Centre, Out of Centre, and Out of Town. I do not refer to Newbury Settlement and I do not use the term Settlement Boundary as this is not a term used within the latest versions of the NPPF & NPPG, and they are false Boundaries which move constantly and are not Community based or based on Ward or Parish Boundaries.

Whatever Vision Documents exist for Newbury are incomplete or miss out Keys Sites. The West Berkshire Vision 2050 produced in November 2022 is not for the whole of West Berks and it does not mention a Key Site like the Kennet Centre.

And the Approach taken within this LPR 2023-2041 by WBC LPA towards Newbury as the Major Town is not good practice in achieve cohesive Town Centre, Out of Centre, and Out of Town Planning.

The Approach of NOT ALLOCATING, into this LPR, any Sites within Settlement Boundaries is flawed. It forces development and re-development of all of our Key PDL & Brownfield Sites & any non-strategic other Sites to take place as Windfalls which is a far from ideal position in terms of Infrastructure Delivery Planning. It would also preclude Greenfields within these false Boundaries from being part of this plan and we have a recent example of a developer coming forward with a very soggy field in Greenham next to Ancient Woodland which will just destroy all the wildlife within it.

Within the current March 2024 Version of the **Local Development Scheme (LDS)** there are only 2 supporting Adopted Planning Documents for Newbury. See below. As the Major Town within this Local Plan Review 2023-2041 I think there are Gaps in Development Plan Documents for Newbury.

This Non-Allocating Approach forces Newbury to have a High % of Windfalls which is why **the Sustainability** of the Town cannot be truly assessed. The Retail Areas are in decline, PDR is allowing unsuitable Flats within DEAs which do not have LDOs, and there is no Zoning or strategic approach to shaping the growth of wider Newbury out to 2041 and beyond.

Sites have either been removed from this LPR at late Stage before Submission, or not included due to this a very non helpful Approach of *NOT Allocating Sites within Settlement Boundaries including PDL/Brownfield Sites in Urban Areas?*

This Approach adopted by WBC LPA has created a Glut of Windfalls. There is no incentive for developers to put forward their Sites for inclusion in our Local Plan when there is a Call For Sites, and they are making the most of this and waiting to raise Sites as Windfall where they often receive less attention than under the robust Local Plan making process. Our LPA has been under resourced for years.

Most unhelpful and, of obvious reasons, this is Not a Policy adopted by many other LPAs for Towns that need expansion, redevelopment and densification. Some Sites that should usefully have been Allocated in this Plan are mentioned under MM18 & MM19.

We have studied 20 other Local Plans and find this is Not an Approach in common with those plans. The Approach would appear to be flawed as it is Not allowing proper Town Planning to take place for Newbury as the Major Town within this LPR 2023-2041.

Thus, allowing them **all** to come forward as WINDFALL means there is no cohesive Vision or compliance with anything that assumes to be the Vision for Newbury, and removes them from Examination by a competent Planning Inspector under a robust Local Plan Making process.

This puts reasonable assumptions on its **Sustainability** as a thriving Market Town into doubt. And without inclusion in Infrastructure Delivery Plans we are now suffering from:

- Lack of Dentistry Provision
- Lack of GP Provision
- Lack of Pharmacy provision
- Lack of a Thames Water DWMP for Newbury under the plans and budgets recently approved by Ofwat- both the Faraday Road Pumping Station & the Main STW (Sewage Treatment Works) need upgrading along with other PS in West Berks especially along the River Kennet Valley which may not necessarily in the approved latest DWMP
- Lack of a Flood Risk Management Plan for Newbury
- Lack of Surface Water Management Plans for many Areas with Flash Flooding and field run off
- Lack of Outdoor Playing Pitches
- Reliance on existing Public Open Spaces which are Not Mapped
- Clashes with Highways access provision into key roads and Hot Spots
- Nothing of substance on the Transport for South-East Strategic Investment Plans to 2050

There is no indication that this Local Plan Review out to 2041 will have a realistic expectation of addressing these existing issues for the here and now, and will they be addressed by the future developments included in this LPR?

With the withdrawal of ADPP 2 [https://www.westberks.gov.uk/media/36353/Area-Delivery-Plan-Policy-2-Newbury/pdf/Area\\_Delivery\\_Plan\\_Policy\\_2\\_-\\_Newbury.pdf?m=1718358100393](https://www.westberks.gov.uk/media/36353/Area-Delivery-Plan-Policy-2-Newbury/pdf/Area_Delivery_Plan_Policy_2_-_Newbury.pdf?m=1718358100393) , which articulates some Vision for Newbury, there is now No Policy for Newbury.

The only SPDs that exists within the Local Development Scheme (March 2024) for Newbury

[https://www.westberks.gov.uk/media/52706/Local-Development-Scheme-March-2024/pdf/West\\_Berkshire\\_Local\\_Development\\_Scheme\\_March\\_2024.pdf?m=1736762191087](https://www.westberks.gov.uk/media/52706/Local-Development-Scheme-March-2024/pdf/West_Berkshire_Local_Development_Scheme_March_2024.pdf?m=1736762191087)

is for:

1. The Sandleford developments which are Out of Town and this was produced some time ago (March 2015) before the Pandemic and changes in Working, Travel and Shopping Patterns.
2. The Newbury Town Design Statement (2018) which fails to mention Key PDL Site the Kennet Centre and has no Quality Design Guide or Model Design Code within it.

Other Documents produced have Not been turned into Planning Documents for Material Consideration, and no more are proposed within this Plan. The more recent Newbury Town Masterplan is helpful, however it does not reflect recent decisions made by WBC Executive, and it has not been prepared as an SPD for Adoption which seems a bit of a waste as it was recently dismissed in a key Site District Planning Committee?

The Market Street Flatted and Build-To-Rent Development did have an SPD and this is a far less impactful site than Kennet Centre/Eagle Quarter which has no SPD and has been withdrawn from this Plan.

Bond Riverside (old LRIE & NEW 1) which despite over 10 years of work still has no SPD, and there is No LDO for the London Road Estates DEA that it sits within. And again, Bond Riverside appears to be being withdrawn from this Plan and has no Employment Site Allocation so no ESA Policy to at least guide basic Design.

The Racecourse Development does have an SPD but the last Eastern End Phase (229 Flats) is not included in this LPR. This Phase for that Site is not Built Out as the LPA are stating, albeit numbers may be in the 5-year land supply? And the Numbers, Size and Height of the blocks on this Site have been dramatically reduced indicating Tall Flatted Developments are not in demand. Please see comments under MM111 – Housing Trajectory - re reduction in numbers approved.

#### **MM2 15 Paragraph 4.17**

Amend sixth paragraph of the policy as follows: 'In making optimum use of land and **achieving high quality design**

This Statement is hard to Justify as WBC LPA does not have Guides or Codes to ensure Quality Design and it has no SPD for Residential/ Mixed Sites apart from Sandleford, and no LDO for Dedicated Employment Areas apart from Greenham Business Park.



For Major Sites in and out of the Plan there is no Local Equivalent of the National Design Guide (NDG) introduced in 2019 or the National Model Design Code (NMDC) introduced in 2021. As it states in the December 2023 Archived Version of the NPPF Chapter 12 Para 134:

***These national documents should be used to guide decisions on applications in the absence of locally produced design guides or design codes.***

The same wording appears in the new December 2024 version of the NPPF and these Documents especially NMDC are Quality parts of the NPPF and NPPG. In a recent very important Planning Meeting an Officer did not acknowledge, in the absence of Local Versions, these National Documents should be used to guide the decision Cllrs were about to make. This was a shame as the PA was suggesting 8 Storeys in a Town Centre.

So **MM2 15 Paragraph 4.17 needs strengthening to mention ‘via National Design Guide (2019) and Nation Model Design Code (2021) as amended or local equivalent adopted Guide and Code’**

Density on individual sites will vary according to their location and context, size of developable area and **site specific** issues such as shape and access: • Within **Newbury**, Thatcham, Tilehurst, Purley on Thames, and Calcot,

Reply: By exclusion of quite a few Individual Newbury Sites from this plan, especially PDL/Brownfield, it will be difficult to control or direct the overall Density and Individual Site Density for the Major Town in West Berkshire and we are already seeing an oversupply of Flatted Development with many more in the pipeline.

Developments are expected to secure a net density of at least 35 dwellings per hectare with densities of at **least 70 dwellings** per hectare in town centres and for flatted developments along main transport routes and close to transport nodes

Reply: Again, by omission of Key PDL/Brownfield Sites from the LPR and removal of ADPP2 we now have windfall proposals for Flatted Development Density of over **160 per Hectare in Multi-storey Buildings (8 levels)** not supported by a Tall Buildings Policy or a Build-To-Rent Policy which inclusion in the plan should have delivered. This is the Kennet Centre/Eagle Quarter proposal currently being fought over which was removed from this LPR at a late stage. Within my knowledge there is currently No policy, master plan SPD, or Development Plan Document to provide a detailed regeneration strategy for Kennet Centre/Eagle Quarter (old NEW 3). I believe this site should have been left in as a Key Site within this LPR and had Site Allocation Policies to guide development.

Update: After Refusal and possible Appeal an alternative is coming forward which will provide 317 Dwellings and due to Non-Allocation this should be used as a figure for inclusion in the Windfall Allowance.

#### **MM5 19 - 20 Supporting text to policy SP2.- Natural Landscapes**

The **exceptional** circumstances necessary to justify the allocation of any sites for major development within NDPs will be expected to be demonstrated **through individual neighbourhood plans.**

Proposals that meet the requirements of the relevant site allocation policy in the neighbourhood plan, along with other relevant policies in the development plan, will be deemed to be in accordance with the development plan and consistent with national policy.

Reply: Sir, whilst one assumes these words relate to NDPs within the Natural Landscapes I am not sure whether these 2 Principles are repeated elsewhere for our **Urban Areas**, so please can we make sure they are. Villages in the Natural Landscape do not necessarily have the Parish Council or Volunteer Resources to produce a Neighbourhood Development Plan so I think this is an unjust Statement.

Due to the Confusion that currently exists over Site Allocation within NDPs we need to ensure we are Very Clear going forward.

In all the mentions for NDPs in various places under various Policies I believe there could be confusion over the Terms Strategic Site and Major Sites. We need a clear Definition of what can be included or excluded within an NDP for the various Settlement Hierarchy types of Villages and Urban Areas. A simple Table in one of the Policies would make this clearer. There is an awful lot of repetition on NDP Policy so, given the importance, may be there should be One Policy on this substantial Matter Arising?

Currently every Site that comes forward for Newbury is forced to be a WINDFALL SITE, and the exclusion of these Sites forces a sort of Greenfields approach to assure a Land Supply that is not under Windfall?

This Greenfields Approach is not currently affecting our Natural Landscapes however, as pressure to increase dwellings increases, so will the pressures to build on our Green Farmlands in the Natural Landscapes and abutting the Natural Landscapes. I can foresee a scenario where a Natural Landscape puts forward a desired Housing Number like the National Parks do and says where these would be best located to support Growth In Rural Employment. In fact, I don't know why this does not currently seem to happen?

In the future, assuming more Sites in National Landscape Villages is allowed and planned for around Employment and Growth, having huge unplanned Windfalls from Major Sites in Urban Areas could possibly lead to over supply overall?

As happened in the October Sessions 4 Greenfield Sites were added in when the PDL of Kennet Centre/Eagle Quarter and Land at 20 - 28A Pound Street, Newbury (Jewsons Yard) 23/02782/FULMAJ decided in Sept 2024, would have provided near the numbers required with far more realistic expectation of delivering within 5 Years.

### **MM6 21 - 22 Policy SP3 – Settlement Hierarchy**

**'Urban Areas:** b) Strategic and non-strategic sites allocated for housing and economic development through other policies in the LPR and/or **neighbourhood plans**.

Reply: This Local Plan Review would be more in line with the NPPF and more meaningful if it included Key Redevelopment Sites for Newbury that have been under discussion for years and now feel like huge Gaps in this LPR 2023-2041. As identified above Non-Allocation is forcing higher Windfall Rates and lack of proper Town Planning. These sorts of Major Sites are not forced into Neighbourhood Plans by other LPAs.

The Newbury NDP has made slow progress to date – not surprising given the confusion- and it has within it the Assumption it will be a NON-Allocating Plan. I contend given the desire to increase the Densification of this Major Town the word exceptional should be removed as it should be the norm to Allocate Key Non-Strategic Major Town and Urban Sites, either within an LPA Wide Local Plan (such as this LPR) or within an NDP.

‘Neighbourhood plans can allocate non-strategic sites for development. These must be located either within and/or adjoining the settlement of Urban Areas, Rural Service Centres and Service Villages. Strategic site allocations cannot be made within neighbourhood plans.’

Reply: This Statement is slightly altered however it does appear that it is a Volte-face (about turn) on the previous decision Not to Allow Newbury NDP to allocate sites within their NDP? And does it conflict with Statements in MM19, and those above re NDP?? I know I am only an Ordinary Resident, but I am confused.

#### **MM7 22 Supporting text to policy SP3 – Settlement Hierarchy**

Amend the supporting text by adding a new paragraph after paragraph 4.34 as follows: **‘Any non-strategic residential allocations within neighbourhood plans that are situated within defined settlement boundaries will not count towards meeting the housing requirement figure in policy SP12.** This is because there is a presumption in favour of development within defined settlement boundaries and to do so would be inconsistent with the assumptions made in the LPR about the District’s overall housing land supply.’

Reply: A very confusing Modification. Unless I have mis-understood the thrust of this Modification I fundamentally disagree with this Modification. Every other LPA we have studied has a Planning Presumption in favour of Development and Re-development within Settlement Boundaries – it is the norm. However, they certainly allocate Key Sites within Town Settlement Boundaries and Include their Housing Numbers in 5- & 15-Year Supply Numbers. Why would they not do this? Settlement Boundaries can be a false Boundary that is easily moved by LPAs with doubttable consultation. It seems to be a bit of a red herring to place so much importance on Not Allocating Sites within the main NPPF Plan Making vehicle called a Local Plan?

The other Local Plans we have studied at Reg 19, or this Stage of Examination would not wish to Exclude Major Redevelopment Sites within their Towns from their Housing Numbers? Forcing up Windfall Rates is surely not what the spirit of a Local Plan is about? Other LPAs are very happy to have these Sites in their plans and their Numbers counted for almost certain delivery, to ensure that proper holistic Town Planning is taking place, and each Area/Zone has appropriate Planning Policy in place,

along with Quality Design and Density parameters that can be supported by Infrastructure which is included and costed in the Infrastructure Delivery Plan?

### **MM10 28-30 Policy SP6 – Flood Risk**

Reply: Sir, you kindly allowed these Modifications to come forward for me, and as a Local Flood Warden, I support all these Main Modifications, thank you.

### **MM11 30 - 32 Supporting text to policy SP6**

Insert new text at the end of paragraph 5.24 as follows: The Environment Agency’s guidance ‘Approach to Groundwater Protection’

(<https://assets.publishing.service.gov.uk/media/5ab38864e5274a3dc898e29b/Environment-Agency-approach-to-groundwater-protection.pdf>) should be referred to for developments which may impact groundwater

Reply: I would like to see a bit more strengthening of this Modification to include these words on the end “**and/or are likely to be impacted by local groundwaters as mapped in the Strategic Flood Risk Assessment**”.

And we need to ensure that Grampian Conditions are used where Flood Risk & Drainage Assets cannot be delivered in advance of occupation. And for Phasing.

### **MM12 34 Supporting text to policy SP7- Achieving Quality Design**

Amend paragraph 5.30 h) as follows: ‘h. Homes and buildings – New development should be designed to be functional, healthy and sustainable, and all residential development should comply with the nationally described space standards, as set out in the Technical Housing Standards (2015) or as superseded, in line within Policy DM30. New development ...’

Reply: I would like the Title of this Policy changed to **Achieving Quality Design** which fits with the NPPF Chapter 12. And I would like the 2<sup>nd</sup> Paragraph of the main Policy in the Blue Box to be changed to read “**National Design Guide (2019) & National Model Design Code (2021)**” as this reflects the wording in the NPPF and makes the default position clearer.

### **MM15 42 Policy SP10- Green Infrastructure**

Amend criterion o as follows: ‘Provide undeveloped buffer zones strips of vegetation along the banks of water courses in accordance with policy SP6.’

Reply: I very much support this addition and would like to see the official term for Buffer Zones used. Those around SSSI assets mentioned within the Amendment, are known as **Impact Risk Zones** (as can be found on DEFRA MAGIC Maps)

The SPD promised under our existing Plan (Policy CS18) seems to have been deleted from the latest published version of the LDS dated March 2024 <https://www.westberks.gov.uk/media/52706/Local->

[Development-Scheme-March-2024/pdf/West\\_Berkshire\\_Local\\_Development\\_Scheme\\_March\\_2024.pdf?m=1736762191087](#)

It was re-promised for delivery by now, via a Public Question to the Executive. It is a great shame we do not have our Green & Blue Infrastructure Framework and Mapping in place for inclusion in the Evidence Base for this LPR. It desperately needs Mapping and typologies understood. We are missing out on opportunities by not having this Framework Mapped, and the continued isolation of our Wooded Lands continues without consideration by Developments on Greenfields.

The wider work on Nature Recovery Networks must be hampered by not having our GBI Framework and Mapping and it appears that the Mapping Facility within the Natural England Green Infrastructure Framework may not be totally accurate for West Berks. I would like to see Reference to the **Natural England Green Infrastructure Framework** lifted as a point in the Blue Box and somewhere and within the Supporting Text a mention of the **NE Access to Green Space Standards** which WBC has not mapped and often does not consider or make clear when assessing the Windfall Sites.

#### **MM17 49 Supporting text to policy SP11- Biodiversity & Geodiversity**

I support having a strong BNG Policy and I support the production of a mapped Green/Blue Infrastructure Framework to facilitate the understanding of Biodiversity and Habitats. And we need to work on Nature Recovery Networks to be in place quickly especially for our Woodlands isolated by development and those that will loose open fields between them. Nature likes to forage and does not like being constrained and not being able to travel around to find food and a home - just like Humans.

#### **MM18 51 Policy SP12 A- Housing Delivery**

To meet the housing requirement, the following sources will ensure a continuous supply of land for housing across the Plan period: • sites allocated within the Local Plan and made neighbourhood plans; • existing planning commitments on unallocated sites; • existing planning commitments for communal accommodation (Use Class C2); and • a windfall allowance

Reply: Not Enough Known Key Sites have been Allocated in this LPR, especially PDL/Brownfield.

Bearing in mind when Reg 18 Version was produced below are some Sites that should usefully have been Allocated in this Plan, especially for Infrastructure Delivery:

- NEW 01 - Bond Riverside within the London Road ESTATES DEA (Dedicated Employment Area) – WBC Legal saying there will now be 400 Flats in this DEA? Will it have Residential or Not?
- NEW 03 was RSA1 at Reg 18 - Kennet Centre (latest was 427 Flats now down to 317),
- NEW 02 - land south of Phoenix Centre, Newtown Road – 24 dwellings
- NEW 07 - former Magistrates Court, Mill Lane – 13 Flats
- Land at 20 - 28A Pound Street, Newbury - PDL Jewsons Yard - (79 with 69 Flats),

- Land East of Newbury College, Monks Lane, Newbury (75 dwellings (42 Flats) + 70 Care Beds & Supermarket),
- Sterling Gardens Phase 2 (?+ Flats) – not started yet why does it have to come as Windfall again as Phase 1 has been very troublesome?
- Eastern End of Racecourse (229 Flats)

These are all Windfall not mentioned or Other Non-Allocated Sites that are mentioned in the Housing Trajectory Table.

The Eastern Phase of Newbury Racecourse which is a Strategic Site with an SPD is not in this plan and the numbers in the Housing Trajectory appear to be incorrect as the Planning Permission given in June 2024 reduced the numbers from 345 to 229 Flats.

Sandleford Park West agreed in April 2024 (360) came forward without a full Infrastructure Delivery Plan which the SPD says needed to be produced.

The Policy adopted by WBC LPA to NOT Allocate into this Plan any PDL/Brownfield Sites and any other known Sites within Newbury Settlement Boundary has created a Glut of Windfalls and will continue to do so. Developers are using this to their advantage to avoid the Local Plan Making process.

Sites to be allocated in Neighbourhood Plans The Council will supply a housing requirement figure to those qualifying bodies either preparing or updating a neighbourhood plan that intends to include residential allocations.

Again is there confusion? Newbury have been advised their NDP will be non-allocating despite there being a Housing Need. And the Sites for the Town cannot be in Local Plans, thus everything that comes forward will be Windfall? This Approach, along with the removal of Key Newbury Sites from this LPR is leading to disjointed and non-holistic Town Planning with no Zoning, no Quality Design Guide or Design Model Code e.g., Height, no Density parameters leading to exceptions to Policy.

6.11 Several sources will ensure a **continuous supply of land for housing** across the plan period. These include: • retained allocations in the Local Plan and Stratfield Mortimer Neighbourhood Development Plan (NDP); • allocations in the Local Plan which are not being retained in the LPR. due to development being under construction; • sites allocated within the Local Plan and made neighbourhood plans; • existing planning commitments on unallocated sites; • existing planning commitments for communal accommodation (Use Class C2); **and • a windfall allowance. • windfall sites: sites not specifically identified in the development plan but that will come forward through the development management process in accordance with policies set out in the Local Plan and through the use of permitted development rights.**; • new sites allocated in the LPR; and • new sites to be allocated in neighbourhood plans.

Reply: Quite a confusing Modification. Is it needed?

Sir, at the risk of repeating myself, which the format and repetition within the Main Modifications tends one towards, by now you will garner I have concerns over the Policies which took Sites out of this LPR ,

and forces known Major PDL/Brownfield Sites to come forward as Windfall without Site Allocation Policy, without SPD, without holistic Town Plans. It is my view the number of Major Sites coming forward as Windfall is unproductive. This Approach is not conducive to good Town Planning and Quality Built Form/Design. It also undermines the integrity of the Local Plan process and can disadvantage Housing developers who want the assurance of their Site being Allocated within the Plan or within Broad Locations Of Growth (BLOG) identified in a Strategic way. It does not allow for clear Infrastructure Delivery Planning to be a part of the Local Plan Review.

Therefore, whilst all these amounts of dwellings in items mentioned in 6.11 might eventually make their way into Numbers, having the high rate of Major Windfalls we have is disadvantageous. And is the Windfall Allowance of 140 for Small Sites or all Windfall?

Newbury is short of all the things listed under MM1.

One cannot help wondering if the number of Major Developments coming forward as Windfall has played a part in the lack of provision of these Infrastructure elements because of lack of inclusion in an overall Infrastructure Delivery Plan. Many LPAs rely more on **Minor Windfalls** and much lower Major Windfall rates to make up their 5- & 15-years supply. I am a real supporter of the Local Plan process and want to see all Key Sites within it.

And because of the Exclusion of the Kennet Centre aka Eagle Quarter from this plan at a late stage and the District Planning Committee decision on the 8<sup>th</sup> January 2025 that the Windfall proposals under PA 23/02094/FULMAJ be Refused we now possibly facing the rather wasteful position of another Inspector probably undertaking an Appeal by the Developers, or another (3<sup>rd</sup> PA coming forward).

In the Late Inclusions in 2024, IF some Newbury PDL/Brownfield Sites could have been included as proper Sites in the Plan, rather than as Windfall, this Plan may not have needed the addition of 4 more Greenfield Sites into the Plan. Kennet Centre & Land at 20 - 28A Pound Street, Newbury (Jewsons Yard) 23/02782/FULMAJ decided in Sept 2024 could make up much of the missing numbers and I am sure we will still get the desired quota of Windfall.

We now have another 4 Greenfield Sites in the Plan rather than inclusion of PDL Sites within Newbury -this flying in the face of the Brownfields first approach.

Sir, If Kennet Centre had been left in it should have also been accompanied by a Build-To-Rent Policy as first suggested by DHCLG to LPAs in March 2015 and within successive NPPF & NPPG. Likewise Tall Buildings Policy as the proposed heights are above those recommended in the National Model Design Code for a Market Town.

It may have even forced a realistic expectation of some local work on Design Guides and Codes and an SPD or even better - inclusion in wider Town Planning SPD which has not happened. The reason for withdrawal – Fluvial Flood Risk – HAS been easily overcome by proper Sequential & Exception Testing and it was not withdrawn at the time of production of the SFRA Level 2 Evaluations for Site NEW 3.

Confusingly, the Reference number RSA1 has now been allocated to another site which caused its removal to be missed by some observers. Tracked changes between Reg 18 &19 show:



|  |                  |           |
|--|------------------|-----------|
| 15:51 Thu 23 Jan   | ***              | 93%       |
|  | westberks.gov.uk |           |
| Policy SP17 North East Thatcham Strategic Site   |                  | 71        |
| Policy SP18 Housing Type & Mix   |                  | 76        |
| Policy SP19 Affordable Housing   |                  | 79        |
| <b>7 Fostering Economic Growth &amp; Supporting Local Communities</b>  |                  | <b>82</b> |
| Policy SP20 Strategic Approach to Employment Land Economic Development & Hierarchy of Centres                                      |                  | 82        |
| Policy SP21 Sites Allocated for Employment Land Economic Development   |                  | 87        |
| Policy SP22 Town & District Centres  |                  | 90        |
| Policy SP23 22 Transport   |                  | 92        |
| Policy SP234 Infrastructure Requirements & Delivery  |                  | 94        |
| <b>8 Non-Strategic Site Allocations: Our Place Based Approach</b>  |                  | <b>96</b> |
| Sites Allocated for Residential Development: Newbury & Thatcham Area   |                  | 96        |
| Policy RSA1 The Kennet Centre Newbury  |                  | 96        |
| Policy RSA1 RSA2 Land north of Newbury College, Monks Lane, Newbury  |                  | 98        |
| Policy RSA2 RSA3 Land at Bath Road, Speen, Newbury   |                  | 101       |
| Policy RSA3 RSA4 Land at Coley Farm, Stoney Lane, Newbury  |                  | 104       |
| Policy RSA5 Land adjoining New Road, Newbury   |                  | 107       |
| Policy RSA4 RSA6 Land off Greenham Road and New Road, Newbury  |                  | 108       |
| Policy RSA5 RSA7 Land at Lower Way, Thatcham   |                  | 111       |
| Policy RSA8 Land at Poplar Farm, Cold Ash  |                  | 114       |
| Policy RSA9 St Gabriel's Farm, The Ridge, Cold Ash   |                  | 116       |
| Sites Allocated for Residential Development: Eastern Area  |                  | 117       |
| Policy RSA6 RSA10 Stoneham's Farm, Long Lane, Tilehurst (Site A)   |                  | 117       |
| Policy RSA11 Stoneham's Farm, Long Lane, Tilehurst (Site B)  |                  | 120       |
| Policy RSA7 RSA12 72 Purley Rise, Purley on Thames   |                  | 121       |
| West Berkshire Council: consultation version 20th January 2023 - Local Plan Review 2023-2041 Proposed Submission (tracked changes) |                  |           |

## MM19 51 - 54 Supporting text to policy SP12 -Housing Delivery

### Amend supporting text as follows: 'Housing need and the housing requirement

I could carry on repeating these messages about Sites Missing from this Plan and those which are Windfall and doubtful of Delivery, however I will not. I will mention under **M111 – Housing Trajectory** - a Site where numbers that are listed in the Housing Trajectory and it is far from clear in terms of Policy and Position going forward, being

n.b. Only one of the DEAs has an LDO.

Existing planning commitments for communal accommodation (Use Class C2) 6.17 The housing supply and delivery section of the PPG requires local planning authorities "to count housing provided for older people, including residential institutions in Use Class C2, as part of their housing land supply. This contribution is based on the amount of accommodation released in the housing market." The Housing Delivery Test Measurement Rulebook gives the ratio for **communal accommodation** based on the national average number of adults in all households as 1.8 based on the 2011 Census. For example, a 90-bed care home would equate to 50 net dwellings ( $90 \div 1.8 = 50$ ). 6.18 At 31 March 2022 2023, there were existing permissions for residential institutions in Use Class C2 which equate to 57 91 unit

Reply: The Term Communal Accommodation could do with some Examples such as Older People or Students. And using the NPPG term "Addressing the needs of different Groups of People" might be more useful as Planning Classes are subject to change.



Having recently been a Family Unpaid Dementia Carer for my mother I believe, based on the calculations above, there will be an under provision for Residential Institutions (Class C2 Type Accommodation) within the life of this plan and I think there is already an under supply. I would like to see an up-to-date piece of work on this specific C2 Class of accommodation and Extra- Care Housing recommended as an Output from this LPR.

### **MM20 55 Policy SP13- Residential & Mixed Site in Newbury**

**Delete the policy and supporting text. Remove references to this policy throughout LPR**

6.29 There is significant potential on previously developed land within settlement boundaries, particularly in Newbury town centre and periphery. **Sites within settlement boundaries are not being allocated.** This is because settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations.

Reply: Sir, I know you can only examine what is in front of you. However, here is where the Policy on Not Allocating PDL/Brownfield and other Sites within Settlement Boundaries is quoted and I truly believe for the benefit of Good Town & Service Village Planning this Approach should be Removed from this LPR and consigned to the Dustbin. The Term Settlement Boundary is not Mentioned within the NPPF.

I fear if it is left as a fundamental Planning Approach, we will again have a High Windfall Rate, including large sites, a lack of cohesive Town & Service Centre/Village Planning, and associated Service Providers struggling to keep up with adequate provision of core Infrastructure Services.

Being left with this as a Planning Policy out to 2041 quite disturbs me and is not the approach taken by many other LPAs. I also do not think it will give comfort to Housing Developers or Residents buying properties with such a policy encouraging high Windfall Rates.

Sir, please can we remove this approach for the rest of the Examination and wherever else it is referenced in this LPR. PDL/ Brownfield first will be catered for and there is already recognition of Land Supply needing to be supplemented by Greenfield and some agreed levels of non-harmful development in the Natural Landscape.

I would also like to see in this Plan the re-instatement of the Kennet Centre/ Eagle Quarter & LRIE/Bond Riverside as Mixed (or otherwise) Sites for Redevelopment that deserve to be included in a 15 year plan.

### **MM27 67 Policy SP18- Housing Type & Mix**

Reply: I support these Modifications and would like to see some strengthening around Adapted Housing which is not just about Wheelchair Access. We need Adaptations in Bathrooms and Kitchens and for houses to be Dementia Friendly. WBC is a Dementia Friendly Local Authority, and some LPAs actually have a Dementia Friendly DM Policy.

We also need to track Numbers of Dwellings that are Flatted and Houses, especially within Town Centres like Newbury where currently the Estate Agents are saying Supply of Flats outstrips Demand.

With over 400 more Flats with Windfall permission and a large number proposed for Kennet Centre we are in danger of having more vacant housing or people forced into the wrong type of housing for their circumstances.

### **MM28 70 Policy SP19 A- Affordable Housing**

Reply: We just need lots more especially Social Housing which act as a Platform for families such as mine to get a lift onto the Housing ladder. Our stock is so depleted, and I am not a fan of handing the whole stock over to one Housing Association that has become so large and is a monopoly in our Area.

### **MM30 73 Policy SP20 – Business Development & DEAs**

Appropriate proposals for business development (offices, industrial and storage and distribution) will be supported where they are located: a) On sites allocated for business development as set out Policy SP21 and in accordance with the individual site specific policy (ESA1 – ESA6) in this Plan or any subsequent neighbourhood plans; or b) **On a suitable site within a settlement boundary**; or c) **Within a Designated Employment Area (DEA) in accordance with Policy DM32**, and as listed in Appendix 4 and as defined on the Policies Map; or d) On previously developed land within existing suitably located employment sites; or e) Within the countryside provided the proposal is in accordance with other relevant policies within the Plan, in particular policy DM35.

Reply: The Only DEA that has an LDO to Guide its Design is Greenham Business Park, so all the others are open to non-restricted PDR and any type of Built Form in terms of Design as there are no Design Guides and Model Design Code.

Why is it OK to Allocate Employment Sites within Settlement Boundaries and not Residential ones?

### **MM31 73-75 Supporting text to policy SP20**

Amend paragraph 7.10 as follows: '7.10 The ELR is clear that the industrial requirement of 91,109sqm is a minimum and therefore the regeneration of the London Road Industrial Estate (LRIE) Bond Riverside area (formerly known as London Road Industrial Estate (LRIE)) will has the potential to provide flexibility to the figures deliver additional supply in the later part of the plan period. The redevelopment and regeneration of the Bond Riverside areaLRIE is a long held vision of the Council and a **recent decision by the Council's Executive (June 2022)** agreed a new approach for the site which focuses on job creation, attracting investment to Newbury and achieving carbon neutrality. The site the area has scope, subject to overcoming other policy constraints, for regeneration and the intensification of employment uses to maximise the potential of the site as an employment location, which at present is not optimum and does not provide an attractive environment for modern day use. At this stage the Bond Riverside area is not considered as part of the supply due to uncertainty with regard to the timing of delivery, but the LPR recognises its potential. The majority of the LRIE siteBond Riverside area falls within the **London Road Industrial Estates DEA**, an area designated for business uses.

Reply: **This is very confusing, and it need not be. Any references to the old name for LRIE should be removed as it has been Bond Riverside for some time. And The Name of the WIDER DEA is LONDON ROAD ESTATES. It was this when it was a PEA under our Existing Plan and Evidence Documents refer to this wider DEA as London Road ESTATES.**

**The Additional Modification not for Consultation to amend the Name of the DEA within Appendix 4 to include the word Industrial must not happen as everyone locally thinks of London Road Industrial Estate as the Lands solely owned by West Berks Council.**

The Name of the DEA should remain as LONDON ROAD ESTATES AND the Term LRIE (London Road Industrial Estate) should be consigned to the Dustbin. We only use the Term Bond Riverside now and we need a new Red Line Map for this please. Psychologically this would also be helpful for Residents as debates over these Lands have raged for 10-15 years. We can go forward as Bond Riverside as Industrial Space without including the Public Open Space (which includes a Football Ground). And Existing Plans and Policies and Evidence Documents refer to the DEA as LONDON ROAD ESTATES so please leave it alone.

A more recent Decision by the Exec at their Meeting in May 2024 (EX 4494) decided:

<https://decisionmaking.westberks.gov.uk/ieListDocuments.aspx?CId=117&MId=7346>

Resolved that: Executive

- Close-down the existing Bond Riverside Programme.
- Merge elements of the Bond Riverside programme with the Newbury Town Centre Masterplan programme, as detailed in section 6: Proposals.
- Note establishment of a Newbury Project Board to provide oversight of the town centres programme including Bond Riverside sites, which will then report into the Prosperous West Berkshire Priority Delivery Board for oversight.
- Withdraw the Council's Reg 19 representations as landowner to the Local Plan Review, which had sought to extend the LRIE Designated Employment Zone to include Faraday Road football ground; now that the site will no longer be redeveloped for commercial use.

The Confusion over LRE/LRIE/Bond Riverside in Planning terms came when it was identified more than 2 years ago that the Public Open Space which included the old Football Ground had been swept within the Boundaries of the Bond Riverside Site when it was registered as a Brownfield site (I think it was in 2017). Since then, the Bond Riverside has been removed from the Governments Map of Planning Data for England Brownfield Land Register. At a recent Exec meeting I asked for a new visual Map of Bond Riverside as an Employment Area to be published, but so far this has not been done. I suggested the Red Line be drawn to exclude the Public Open Space and if they wished to show the full extent of WBC Land as Owners, they introduce a Blue Line Boundary. Therefore, any Maps in the Evidence Documents are likely to be incorrect.

As with the lack of SPDs mentioned previously, and SPD was promised for Bond Riverside (old NEW 1, old LRIE) and never materialised. On Turning Aside and Refusing the Appeal for the Newspaper House Site which was for a Flatted Development next to Bond Riverside and within the London Road Estates DEA, these remarks were made by the Inspector/KC:

*It is clear from some of the evidence provided that there are some ambitions that the Council have to regenerate the London Road Industrial Estate, which may possibly include some housing. However, to my knowledge there is currently no adopted policy, master plan, or development plan document to provide a detailed regeneration strategy for this industrial estate.*

An SPD for Bond Riverside (LRIE -as it was then) was promised on 17<sup>th</sup> December 2020 under EX3978

It should have appeared in the LDS dated March 2024 – it did not and now preparation of an SPD appears to have been withdrawn on 23<sup>rd</sup> May 2023 under EX4494, although the Document does not actually say this.

<https://decisionmaking.westberks.gov.uk/ieListDocuments.aspx?CIId=117&MIId=5689>

<https://decisionmaking.westberks.gov.uk/ieListDocuments.aspx?CIId=117&MIId=7346>

It is important to note that the DEA includes the Council owned **Bond Riverside Plots**, and the adjoining Riverpark Industrial Estate but excludes the football ground. **(should say Public Open Space as the POS is bigger than the Football Ground).**

A key aspiration of the regeneration is to increase the type and level of employment opportunities on the site through intensification and more efficient use of brownfield land. The Council are currently preparing a comprehensive strategy for the delivery of regeneration on the LRIE site. Due to the timing of this strategy and the site's location within the settlement boundary of Newbury, **the site has not been identified as a site allocation**, however it does need to be **recognised as an area of regeneration** for its potential to deliver **flexibility to the employment figures over the plan period.**

Reply: I would like to see it in this Local Plan.

1. As above we believe the Previously promised SPD for Bond Riverside has been cancelled, so can the LPR be clear on its position withing this LPR and whether production of an SPD will be included in the LDS?
2. There is no LDO for the wider London Road Estates DEA – should production of one be added to the LDS? Should any PDR be restricted?
3. A new Map of Boundaries of WBC Bond Riverside Employment Land within the London Road ESTATES DEA needs issuing even if it does not appear in this LPR for delivery later in the Plan timescale,
4. In the absence of a LDO, Clarification needs to be sought on whether future Planning Applications that come forward within the LONDON ROAD ESTATES DEA with dwellings in them are acceptable as Policy DM32 leaves this open to interpretation.
5. Please can the Registered Brownfield Sites be added to the Policies Map for Information as this will show clearly where a DEA has a Brownfield within in it, or whether they are all standalone outside DEAs, and whether they are within or outside Settlement Boundaries.

The first paragraph needs changing to this: It is important to note that the London Road ESTATES DEA includes the Council owned **Bond Riverside Plots**, and the adjoining Riverpark Industrial Estate but

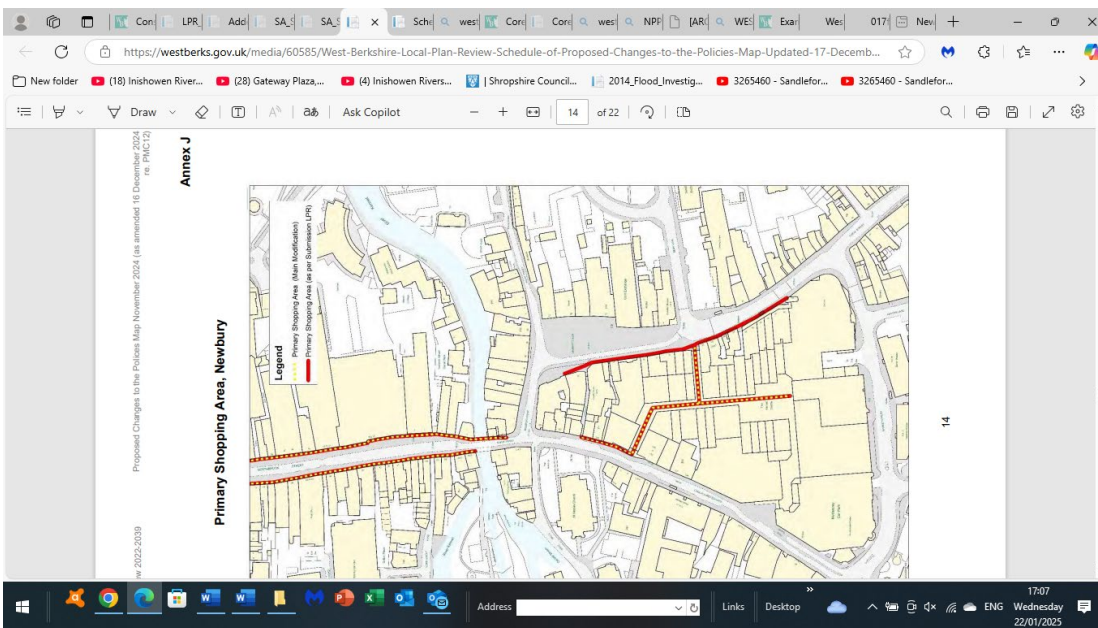
excludes the **Public Open Space which currently includes a Football Ground. (The WBC Public Open Space is bigger than the Football Ground).**

Sir, On the GIS Maps data available to you almost all the LRE DEA shows as in Floodplain 2, and a significant Area is included under Flood Risk 3A plus Climate Change.

The SFRA Level 2 for Site NEW1 gives further details on this with recommendations. If none of this is made clear and there are No Site Allocations within the DEA or Bond Riverside then these Employment Lands will be subject to Windfall Applications, and in the absence of bigger picture FRA & SWMP, this will be regrettable. Due to recognised downstream flood risk from a restricted culvert, and the known Pollution of the Northbrook stream, any site coming forward within this Thames Water Surface Water Catchment will probably end up being challenged.

### MM33 79 Policy SP22 – Town & District Centres

Amendment to the Newbury Primary Shopping Area on the east side of the Kennet Centre fronting Market Street as shown in the Schedule of Proposed Changes to the Policies Map (PMC10)



Newbury Town Centre Primary Shopping Area AP71. Council to change the Policies Map to delete the designated Primary Shopping Area on the east side of the Kennet Centre fronting Market Place.

Reply: As the Kennet Centre/Eagle Quarter Site has been removed from this Plan it is not clear why these Boundaries are being changed? I have referred this to Newbury Town Council for comment within their response to this MM Consultation. I do not understand what else within the Plan would trigger this Modification.



Development will be required to ensure the timely and coordinated delivery of necessary infrastructure, having regard to the latest version of the Council’s Infrastructure Delivery Plan, through proportionate financial contributions and/or on- site provision. Where necessary, the phasing of development will be linked to infrastructure provision.’

Reply: When I reviewed the IDP presented with the LPR Submission I had no confidence it was adequately covering all the Infrastructure Assets that might be required to support the delivery of the LPR 2023-2041, and I felt there was much missing from that piece of work. All the other points I have made in relation to the Non-Allocation of Sites within Settlement Boundaries and high Windfall Rates are very pertinent to production of an IDP with a realistic expectation of delivery. IDP are often presented as Spreadsheets.

#### **MM35 85 Paragraph 8.2 A**

Reply: No Comment

#### **MM36 85 After Paragraph 8.2**

8.4. There is significant potential on previously developed land within settlement boundaries, particularly in Newbury town centre and periphery. **Sites within settlement boundaries are not being allocated.** This is because settlement boundaries are a long-established planning tool. They identify the main built-up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations.

Reply: I strongly object to this Policy Statement which is not commonly adopted by other LPAs. It shows an over reliance on Settlement Boundaries which are constantly changing and often with minimal public consultation. The words Long Established to me imply Old Fashioned. It forces perfectly good sites that should be within the Local Plan to become Windfall, it stifles good holistic Town Planning, it does not give Housing developers confidence, it forces these Windfall into Planning Committees, it risks increase in Appeals, and it makes Provision by Infrastructure & Service Providers very hard to predict and plan for. Such as the NHS, Dentistry & Pharmacy providers, Thames Water, West Berks Highways, West Berks Lead Local Flood Authority, WBC Education, and others.

For me, if there is one thing that would improve this Local Plan Review 2023-2041 and our Policies for the Future it would be the removal of this over-arching Approach mentioned in several Policies, which I view as an Outmoded Approach to Local Development Planning under the guidance of the NPPF. As many Major Sites as possible should be Examined.

#### **MM37 85 Policy RSA1 Delete the criterion**

Reply: now this criterion has been added to SP Policy I agree it is not necessary within each Site Allocation providing there is assurance that the mechanisms exist within the LPA to undertake the provision of proper forward looking, planned and budgeted Water Infrastructure Assets. We have not been including any Major Sites within Settlement Boundaries that come forward as Windfall as Thames Water are not a Statutory Consultee for Sites outside the LPR.

**MM42 - New RSA policy – Land at Henwick Park, Bowling Green Road, Thatcham Insert new RSA policy and accompanying indicative site map into LPR after policy RSA5 as follows: ‘Policy RSAX Land at Henwick Park, Bowling Green Road, Thatcham (Site ref CA12) -225 dwellings**

Reply: I would like this Site removed and replaced with:

1. Kennet Centre/Eagle Quarter Site aka The Mall, The Kennet Centre, Newbury RG14 5EN  
23/02094/FULMAJ- 317 flatted dwellings  
<https://decisionmaking.westberks.gov.uk/documents/s128839/23.02094.FULMAJ%20DPC%20Full%20Report%20-%20Kennet%20Centre.pdf>
2. Land East of Newbury College, Monks Lane, Newbury- 22/02754/OUTMAJ Newbury – 75 dwellings +70 C2 beds & another Supermarket)  
<https://decisionmaking.westberks.gov.uk/documents/s121507/2.%2022-02754-OUTMAJ%20-%20Land%20East%20of%20Newbury%20College%20Report.pdf>
3. Land at 20 - 28A Pound Street, Newbury 23/02782/FULMAJ (79 dwellings inc 69 Flatted)  
<https://decisionmaking.westberks.gov.uk/documents/s127123/1.%2023-02782-FULMAJ%2020-28a%20Pound%20Street.pdf>
- 4.

Total 471.

**MM43 - New RSA policy – Land east of Regency Park Hotel, Bowling Green Road, Thatcham Insert new RSA policy and accompanying indicative site map into LPR after policy RSA5 as follows: ‘Policy RSAX Land East of Regency Park Hotel, Bowling Green Road, Thatcham (Site ref CA17) – 45 dwellings**

Reply: As above for MM42

**MM45 - New RSA policy – Land at Pincents Lane, Tilehurst Insert new RSA policy and accompanying indicative site map into LPR before policy RSA6 as follows: ‘Policy RSA X Land at Pincents Lane, Tilehurst (Site Ref: TIL13) – 138 dwellings**

Reply: As above for MM42

**MM57 - New RSA policy – Land North of Pangbourne Hill, Pangbourne Insert new RSA policy and accompanying indicative site map into LPR after policy RSA15 as follows: ‘Policy RSAX Land north of Pangbourne Hill, Pangbourne (Site ref PAN8) – 25 dwellings**

Reply: As above for MM42

**MM66 136 Policy RSA25 Delete the criterion as follows: ‘k) No caravans will be permitted within Flood Zones 2 and 3 at the northern edge of the site’.**

Reply: I support the Reply from Enborne Parish Council.

**MM67 138 Paragraph 8.3 Amend paragraph 8.3 and insert additional text and table after first sentence as follows: ‘Sites allocated for employment land**

The Council will seek to ensure that sufficient sites are provided in the right locations to foster sustainable economic growth. The allocated sites are focused around or near to areas of existing employment activity, and mainly adjacent to defined Designated Employment Areas. Those sites allocated on land adjacent to a DEA, will, through this LPR, now form part of that DEA.

Reply: I do not agree with WBC request to remove the Bond Riverside Employment Site from this Plan. Bond Riverside should be included as an Employment Site Allocation within This LPR (it is within the London Road ESTATES DEA) with a new ESA Policy & a new Map showing the Public Open Space removed from the Red Line Boundary.

It is expected to deliver more Employment Space during the Plan Period. It, and the wider London Road Estates DEA, should have appropriate Development Plan Documents. And these Planning Documents should be included in the new LDS the Inspector wished to see published.

The Bond Riverside Site needs to be Allocated so that it has a Site Allocation Policy to guide any PA coming forward on a Plot-By-Plot basis until suitable DPD are approved. The way WBC as a Landowner has dealt with this Site outside of the Local Plan process has not been an example to others of best or even good practice. And Residents of Newbury Clayhill Ward deserve better clarity after many years of unfruitful speculation.

Inclusion as an ESA would give Bond Riverside Site some focus and direction and there is useful information for site NEW1 in the HELAA & SFRA Level 2 that can be taken forward into ESA Policy.

And will this Policy statement above apply to Windfall Employment Sites that come forward on Land Adjacent to a DEA? Will DEA Boundaries be extended in the way that Settlement Boundaries are extended and is there a process for Consultation between Local Plan productions.

### **MM73 150 Policy DM1- Residential Development in the Countryside**

Reply: I welcome the removal of the words removed from this Policy however I think that the Placing of Rural Village Allocation Sites within this Plan must be encouraged where it makes sense and lack of Sites is stifling young families who wish stay near their Loved Ones and Older People. Not all Villages wish to produce a Neighbourhood Plan and having the volunteers to do this is asking a lot of people. The Criteria within Points DM1 a-h are rather strict as is the word Exceptionally.

As an example: There are smaller field sites that came forward in the Call For Sites that would make ideal additional housing in villages such as **Boxford** which now has a Pub again and is on a Bus Route with nearby Primary Schooling, has a well-used Village Hall & a strong Church Community. It would be ideal if some of the lost Social Housing stock that has deteriorated over the years could be replaced and Affordable Housing was included to help replace the loss of Social Housing and smaller Bungalows which are all being extended without any replacement or protections of Bungalows due to lack of Bungalows Policy.

I know all these Downland Villages from my younger life, and I spent Lock Down in this Village and the **Site BOX 1** which was put forward would be an ideal addition to this Plan (1.5 hectares of developable Land to the South of the Recreation Ground), but it is not in here because of criteria that will not help the village have a balanced population and housing stock for future growth. It is within the Natural



Landscape however IF the National Landscape Authority were asked to provide a Housing Allocations I suspect it would be considered.

#### **MM74 153 Policy DM3 – Health & Wellbeing**

Reply: The Provision of a Mapped Green Infrastructure Framework SPD is fundamental to the delivery of a Health & Wellbeing Policy. There is also an absence of Policy on the Provision of Medical Facilities so a process must exist to undertake Cumulative Impact Assessment for Sites within this LPR and Windfalls arising which is where we have failed in the past. The cs18 Promised GI SPD has never been delivered.

#### **MM75 155 Policy DM4- Building Sustainable Homes & Businesses**

Reply: Whilst this Policy addresses Energy Efficiency within Buildings, I can see no DM Policies within this LPR to address the **Possible Provision of Energy** on lands within West Berkshire. It is highly likely the LPA will be asked to consider PAs for **Production of Green Energy** on lands within the district. Such as Solar Farms, Wind Turbines, Hydro-electric Power on the Rivers, and it will be asked to consider PAs for Data Centres and BESS so having some Policy other than the high-level NPPF & NPPG would be beneficial. Without we are bound to get into rows about Windturbines!

Sir, if there is a way of addressing these Gaps in Policy which other LPAs do have, I think it would be advantageous to have some in this LPR 2023-3041 and not wait for the next Local Plan as it is a fast changing world.

#### **MM77 163 Supporting text to policy DM6- Water Quality**

Reply: As a member of the Lambourn Valley Flood Forum for the Lower Reaches of the River Lambourn I completely support this Modification.

#### **MM78 165 Policy DM7- Water Resources & Waste Water**

Reply: I support these Modifications. We have not been good at Phasing development in line with Upgrades to Water Provision & Disposal Assets as is evidenced by the Donnington Heights & Shaw Valley Developments where the Dene Way Pumping Station is still awaiting it upgrades.

A mechanism should be put in place by the LPA to allow for the Sites in this Plan and the significant amount of Windfalls that are encourage to be Cumulatively Assessed as Thames Water are only a Statutory Consultee on Sites within Local Plans.

Grampian Planning Conditions should be imposed where there isn't capacity, and Phasing of Build-Out must consider and be scheduled around local Pumping Station Upgrades.

#### **MM79 167 Supporting text to policy DM7 –**

Reply: Agree, however the Comment from the LPA under IN26 seems a little unfair when the LPA insistence in Not Allocating Sites within Settlement Boundaries and it forces many Windfall Sites that are not necessarily planned for by the Water Company who must submit DWMPs to Ofwat many years in advance.

## MM86 189 Policy DM19- Specialised Housing

Housing for older people covers a wide range of needs, from sheltered housing (where residents live mainly independent lives whilst sharing some communal facilities) through to extra care housing and care homes, where a level of personal health care is typically provided. Proposals for specialist housing will be considered on their own merits having regard to whether the proposal falls within Class C2 or Class C3 of the of the Use Classes Order. This will depend upon factors such as the level of personal care offered, the type of accommodation and level of communal space and facilities. Preapplication advice should be sought if clarification is needed as to whether a development is likely to constitute a specialist care housing provision.'

Reply:

Older People - The West Berkshire Vision to 2050 states a projected increase of 1200 with Dementia... Is there any evidence this Special Group will be catered for? And over 2700 increase in those with Mobility Problems to 2039. Likewise, 1200 Wheelchair Adapted dwellings which equates to 12% of Total Housing Need. Some of these Special needs will overlap and many will have End Of Life needs that cannot be delivered in ordinary Housing Domiciliary Care. I am not sure the Plan is clear enough on how and where the Sites to fulfil these Special Housing Needs will be met.

The Class C definitions for Specialist Housing are not very clear and it is difficult to ensure those wishing to have Domiciliary Care are able to do so with the necessary physical and social infrastructure that transforms Development into Communities by providing required Physical & Social Infrastructure for Older People and those with Special Needs– especially on Steep Hillides.

Slightly off-piste, however with the largest rises in Population Age Groups likely to be in Older Adults, I would like to see some Local Policy on **Space & Access Standards** for Individual Bedrooms in Specialist Housing, including Extra Care Housing, Residential Care Homes, Nursing Care Homes, Hospices, and Palliative/End-of-Life Rooms. The Scottish Standards are a good Guide and ensure that when patients become bed-bound they can be dealt with in the correct manner with plenty of room around their bed. Also access for patients in and out of rooms horizontally via stretcher or undertakers trolley needs to be possible.

<https://www.gov.scot/publications/national-care-standards-care-homes-people-physical-sensory-impairment/pages/2/> **Standard 4.** Campaigners call this need “12.5sqm for Our Loved Ones”.

The Policy and Supporting Text makes no Reference to Space Standards within Individual Bedrooms and this is particularly important for Conversions who tend to squash in extra rooms by splitting rooms and installing toilets in cupboards thus these rooms are not suitable for bed-bound people, and they have no consideration for horizontal Entrance and Exit from bedrooms via Stretcher or Undertakers Trolley – I have personal experience of the latter. I have mentioned the Scottish Standards above. The Technical Housing Standards – Nationally Described Space Standards are not sufficient for Residential Nursing Care, Dementia, Palliative & End Of Life Care. If it were possible to have a Local Policy or a Recommendation it would be most beneficial for our growing population of Older Adults who will not be in Domiciliary Care. Numbers are increasing monthly.

### **MM93 210 Supporting text to policy DM32 – Designated Employment Areas**

Amend paragraph 12.2 as follows: ‘12.2 For the purposes of this Plan business uses/development are offices (Egi and Egii), industrial, storage and warehousing and distribution (Egiii/B2/B8), and the term employment land refers to the land on which these uses are located.

Reply: Bond Riverside as a Site within the LONDON ROAD ESTATES DEA should be included as an Employment Site Allocation. At the moment it is in limbo and even a short ESA Policy would help.

### **MM102 232 Policy DM42- Transport Infrastructure**

Amend the final two sentences in the first paragraph of the policy as follows: ‘Where required, new developed will be expected Development will, where necessary, be required to make a proportionate contribution to the provision of or improvement of a range of to transport infrastructure. This transport infrastructure will specifically, but not exclusively, include including, where relevant, the following:...’

Reply: With a high percentage of Windfalls, especially those within Town Settlement Boundaries, I think this Modification will be hard to achieve. And I am not sure enough discussions has taken place around the A4 as an arterial route and the A339.

### **MM105 235 Policy DM44- Parking**

‘The layout and design of parking spaces should follow take account of the parking design guidance included within the Council’s ‘**Highway Design Guidance for Residential Development**’ in order that good quality homes and neighbourhoods are created.’

Reply: The Govrnment recommended including Build-To-Rent Policies in Local Plans in Sept 2021, however in the absence of a Built-To-Rent Policy within this Plan the Council’s Highway Design Guidance for Residential Development might need amending to include another Category which caters for these types of developments.

‘Where developments are required to develop travel planning measures, it is expected that necessary targets will be set to restrict single occupancy vehicle journeys and to increase sustainable travel and undertake regular monitoring and reporting in line with the requirements of the Local Planning Authority.

Reply: As for Paragraph above.

### **MM107 238 Supporting text to policy DM45- Travel Planning**

Commonly Travel Plans should be monitored for a period of five years, which should allow for travel patterns to become established. **However, for large multi-occupancy developments which may be built over an extended period**, the monitoring period may cover a period encompassing the construction and final occupation of the development and include a period of up to five years beyond final occupation. In these incidences, the monitoring period will be agreed between the Council and the developer.’

Reply: Again, in the absence of a Built-To-Rent Policy in a Tall Building (such as the Kennet Centre-NEW3) without enough parking of its own, consideration might need to be given for the monitoring of travel plans, therefore I agree with this Modification.

### **MM110 261 - 268 Appendix 7**

Delete the text under the table in appendix 7 as follows: The following site allocation policies from both the West Berkshire Core Strategy 2006-2026 and the Housing Site Allocations DPD 2006-2026 have not been carried forward as part of the LPR as they have either been built out or are nearing completion.

#### **• CS2 Newbury Racecourse strategic site allocation**

Reply: The Eastern Phase of this Strategic Site Allocation is not yet built and has changed significantly in its aspirations, and I would query whether **not** carrying forward this part of the Site is a wise thing to do?

### **MM111 269 Appendix 8- Amend the housing trajectory as set out in Annex N**

Reply:

**Newbury Racecourse** – all built out apart from East End – 7 blocks of flats - 23/01100/RESMAJ which varied Condition 32 and reduced numbers from 421 and not more than 250 flats with plans showing 229. Of the 229 dwellings, 167 are proposed to be open market and 62 are proposed as affordable housing, comprising 23 social rented dwellings and 39 shared ownership dwellings. Therefore, I think the numbers in the Housing Trajectory may need amending as they show more than this.

**Sterling Industrial Estate – phase 2** – Windfall again. As a known Site with a 2<sup>nd</sup> Phase why is it not in this Local Plan?

### **Land Off Faraday & Kelvin Road, Newbury (within the London Road Estates DEA)- 167 Flats**

PA 12/00772/XOUTMA and 18/01553/OUTMAJ – Land Off Faraday & Kelvin Road is within the London Road Estates and within the Plots labelled as Bond Riverside. Both Pro-Vision and I mentioned this Site during October Examination. Had Bond Riverside or even these Plots been included in this Local Plan it would have forced the discussions and more clarity on:

- Whether there should be a LDO for the London Road Estates DEA? Should PDR be restricted given the shortage of Light Industrial Employment Lands?
- Whether a Flatted Development is desirable within the DEA and in this position next to the A339? Poor Air Quality by a major junction with traffic lights and idling cars?
- How should Flood Risk Assessment (FRA) for the DEA and Sites and Plots within be dealt with?
- Is it feasible for Bond Riverside to deal with FRA on a Plot-by-Plot basis?
- How will Surface Water Management Plans (SWMP) coming forward within the DEA and Bond Riverside be dealt with to ensure Manmade Flood Risk to downstream dwellings is mitigated? (The SFRA Level 2 Pgs. 105-109 highlights a different approach)

- How should the known Industrial Pollution discharge be dealt with? This is from the Thames Water Surface Water Outfall which the London Road Estates DEA drains into and is collecting downstream in the Northbrook on private land within residential house boundaries and behind blocks of Flats and the Rills of the Newbury Business Park on the A4.
- What needs to be done for the known Pollution in the groundwater under the DEA.

We heard from WBC Legal thoughts around increasing Dwellings (from 167 to 400) within this Dedicated Employment Area and now debates on this and the matters arising above will roll on under confusion and will probably result in Legal challenges by Residents Downstream (under Drainage Law) and possibly Judicial Review. The problems of Flood Risk from and Pollution in the Northbrook are well known by WBC, TW & LPA. The open stream in gardens has 1.5m deep black Industrial silts, and there are Risks of both Fluvial & Pluvial Man-made Flooding from the London Road Estates DEA and a restrictive Culvert below it.

Lands somewhere within London Road Estates DEA are likely to be needed for Surface Water Attenuation probably including Plots within Bond Riverside, and possibly in and around Service Roads.

Currently this does not sound like Good Town Planning

Anything that comes forward for the Land Off Faraday Roan & Kelvin Road will be challenged and we know it will not deliver as per the existing Planning Application and it might be better to exclude this Site from the Housing Trajectory and, as suggested previously, Include Bond Riverside as an Employment Site Allocation within the Plan as there is a realistic probability that it will deliver Additional Employment space within the next 15 years.

The Site has not been started, and the access road is rather a red herring to try and keep the PA as Extant, and no SuDS Conditions have been discharged. So removal from the Trajectory of a few Individual Plots within Bond Riverside seems logical and inclusion of the combined plots called Bond Riverside as an ESA would seem more logical for a forward looking Local Plan.

End of Document.

29.01.2025