

15/02/2023.

To: Councillors Phil Barnett, Jeff Beck, Jo Day, Billy Drummond, Nigel Foot, Roger Hunneman, Pam Lusby Taylor, David Marsh, Vaughan Miller, Andy Moore, Gary Norman and Tony Vickers

Substitutes: Councillors Martin Colston, Jon Gage and Stephen Masters

Dear Councillor,

You are summoned to attend an Extra meeting of the **Planning & Highways Committee** on **Monday 20/02/2023 at 7:30 pm.**

The meeting will be held in the Council Chamber, Town Hall, Market Place, Newbury, RG14 5AA and streamed via Zoom. The meeting is open to the press and public.

Join Zoom Meeting

<https://us02web.zoom.us/j/84286243633?pwd=UnMxM2ZVM25nUmhxU3FXVjcvdTRaUT09&from=addon>

Meeting ID: 842 8624 3633

Passcode: 681066

Hugh Peacocke
Chief Executive Officer

AGENDA.

1. **Apologies**
2. **Declarations of Interest and Dispensations**
Chairperson
To receive any declarations of interest relating to business to be conducted in this meeting and confirmation of any relevant dispensations.
3. **The Newbury Town Centre Conservation area Appraisal and Management Plan (Appendix 1)**
Chairperson
To agree the Town Council's response to the consultation in this matter (Appendix 1 is the recommendations from the council's Heritage Working group in this matter)

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4. **The Local Area Plan Review Regulation 19 Consultation (Appendices 2.1, 2.2 2.3 and 2.4)**

Chairperson

To agree the Council's response to The Local Area Plan Review Regulation 19 Consultation

Notes of the HWG discussion of the draft Local Plan review, 2nd February 2023

Present: Mr Anthony Pick [chairman], Councillors Nigel foot and Gary Norman, Dr David Peacock, Mr. John Gardner, and Mr Adrian Edwards

In attendance: Mr Hugh Peacocke, CEO

1. Introduction and apologies for absence.

The Working Group Chairman, Mr Anthony Pick, explained that this meeting had been called at the request of the Planning and Highways Committee of Newbury Town Council, asking that the Working Group review the draft conservation area appraisal (CAA) and management plan for the Newbury town centre conservation area, and make recommendations to that Committee to consider when responding to West Berkshire Council's consultation.

Apologies were received from Valerie Pollitt, Judith Thomas, and Phil Wood.

2. Conflicts of interest.

Mr Anthony Pick declared his wife's interest in the Methodist Church building occupied by City Arts.

Mr. David Peacock declared that he was the chairman of Newbury Society and a member of Newbury District Field Club.

3. Recommendations from the Heritage Working Group to the Planning and Highways Committee of Newbury Town Council:

The Working Group was pleased that West Berkshire District Council was finally progressing the preparation after Newbury town centre conservation area appraisal. The Working Group welcomed the positive support the draft document gives to conservation measures and the guidance set out for conservation and future planning and development within the area covered by the CAA.

However, there was serious concern that the District Council had failed to involve or discuss the preparation of the draft document with any local interests such as the Town Council, the Newbury Society or the Newbury District Field Club, or to avail of local expertise such as Dr David Peacock, who would have been more than willing to assist in this matter.

As a consequence of this, the draft document contains many inaccuracies and mistakes which could have been easily picked up with local assistance and involvement.

It was pointed out that this is the approach recommended by Historic England, which encourages planning authorities preparing conservation area appraisals to consult and involve local communities, Parish Councils and other relevant local bodies.

The Working Group then went on to address the following matters:

A) Boundary review

Concern was expressed that, given the boundaries shown in the map on page 16 between the adjacent Kennet and Avon Canal conservation areas and the Newbury town centre conservation area, this Appraisal would effectively remove sensitive areas from the Newbury town centre conservation area, without acknowledgement or consultation. This problem is a consequence of the draft Appraisal's inaccurate interpretation of the existing boundaries of the Newbury town centre conservation area, confirmed in 1990, which lie far from Newbury Bridge both to the east and to the west. The areas removed would include Newbury Lock, West Mills (road and mills site), and West Berkshire Museum. These would then be without conservation area protections until the two Kennet & Avon Canal conservation area boundaries could be redrawn to match those shown on the map (i.e. for an open-ended period).

It was recommended that WBC checks the Schedule and map of the most recently-approved boundary of the conservation area, dated 1990, to confirm the foregoing, and the error of the map on page 13.

It was pointed out that seven Canal conservation areas were created along the canal across West Berkshire in 1983, and suggested that the two adjoining Newbury be known as Kennet and Avon Canal (Newbury East) and Kennet and Avon Canal (Newbury West). These are, in fact, the existing names. Also that in several places the draft CAA has east and west the wrong way around.

The Working Group recommends the following responses to the proposed boundary changes:

1. subtract: grass "verge" NE of Victoria Park.

Object. Trees on the site provide an important screening effect as part of its ambience, and should be protected as part of the conservation area.

2. subtract: [St Mary's Road area] between Victoria Park and London Road

Object to the removal of this area as a whole. As a minimum, parts bordering Victoria Park, areas containing mature trees and areas around buildings of value should be retained in the conservation area. In practice, this requires retaining this area at present to ensure that time is available for a more considered decision to be taken.

3. add: infant schoolhouse, Speenhamland.

Support.

4. subtract: area NE of Oxford Road [opposite Waitrose]

Strongly object. This contains important listed buildings such as Wessex House and 20 Oxford Road, and is an important gateway to Newbury.

5. add: area West of the Broadway and Northbrook Street [N end]

Support.

6. subtract: area West of Northbrook Street [West Street etc]

Object. No arguments have been presented for its removal.

7. subtract: area West of Oddfellows Rd and Bartholomew Street [incl. part of Craven Road].

Object. This includes 1840's buildings and the 1862 Diamond House in Craven Road, a major horse chestnut tree in Kennet Road, and the former Phoenix Brewery and its brewer's house.

8. add: area traversing the railway [61 Bartholomew Street, etc]

Comment. This is already in the conservation area, except for the section of railway, which does not need to be included.

9. subtract: area south of the railway [Pound Street, part of former Jewson builders' yard]

No objection.

10. subtract: area south of Derby Road and south of St John's roundabout. Two areas.

Object. (a) Hampton Road and Derby Road. This is an important historic setting comprising a number of listed buildings. The 1930's locally listed buildings and their ambience require protection.

(b) In the angle between the St John's Post Office/Old Newtown Road and Newtown Road, the area of trees. These make a significant and positive contribution to the conservation area, and should be retained.

11. subtract and add: [areas in] Link Road and Newtown Road (minor) [Fair Close etc]

Object. This is the historic Fair Close. It provides the setting for the Lower Raymond's Almshouses, and the planting makes a positive contribution to the conservation area. The lack of detail in the map makes it difficult to be precise about the exact area involved.

12. subtract: Western part of St. Nicolas' school playground (error in description 4.15 p. 19; listed as area south of Derby Road and south of St. John's roundabout i.e. a repeat of the description for area 10).

No objection.

13. subtract and add: areas by Newbury station (minor) [S of railway, W of station building]

No objection.

14. subtract: area north of the railway [station approach triangle].

Object. This site provides an important boundary to the conservation area, including trees which can be seen from along Cheap Street and as far away as the Market Place, helping to screen the conservation area from the A339 dual-carriageway.

15. subtract: area to the West of the a339 [E end of kings Road W].

Object. Again this provides a soft boundary to the conservation area, with four plane trees, another tree and the neglected opportunity for more planting. It also helps to partly screen the unsightly Telephone Exchange from the A339.

16. add: area around the old post office.

Comment. The former post office is already inside the CAA. However, we would support adding the Royal Mail yard (particularly the Cheap Street end, following the building line) and would not object to adding this stretch of Bear Lane.

17. subtract: Newbury wharf, area of bus station and car Park near KFC.

Object. This area was added to the conservation area in 1990 following strong local opposition to development plans for Newbury Wharf the previous year. It allows open views towards the Granary/ Corn Stores and with landscaping / planting (including the replacement of mature trees which were present in 1990) could make a positive contribution to the conservation area.

B. Character Areas and Zones

The Working Group **recommended** that the Town Centre conservation area should be divided into at least two separate areas (north and south?) to facilitate reviews in future years.

C. **Building Audit**

The Working Group expressed serious concerns at failures in the draft regarding listed buildings. The total of listed buildings is wrong and some important ones are omitted.

The Working Group **recommends** that the CAA includes an audit of listed buildings, with a full list by name.

At a minimum, there should be a list of the two Grade 1 Listed buildings and the seventeen Grade II* listed buildings within the conservation area.

Photographs of all nationally and locally listed buildings, and buildings recommended for local listing, should be included in an Appendix, arranged street by street. As the first Appraisal for this area, this document will become a benchmark against which future change will be measured.

The Working Group supported the recommendations for local listing of 6 additional buildings:

- 79 Bartholomew Street
- The Nags Head
- 44 Cheap street
- Methodist Chapel (Hampton Road)
- The Cross Keys
- The Salvation Army Hall.

The Working group also **recommends** the addition of St. John's Vicarage.

D. **Positive, negative, and distracting elements.**

The Working Group welcomed this useful summary.

"Failures to apply the Supplementary Planning Guidance (2003) on Shopfronts and Signs – Walkabout, Wilco, shopfront in Pound Street (Figure 218)."

The Working Group **recommends** that the SPG 2003 be added to the Planning Policy Context (Section 3 of the draft)

Paragraph 11.8 of the draft refers to "Inappropriate signage, wayfinding, street materials, furniture, lighting and other infrastructure that erode the historic character and appearance of the conservation area", which includes

"In some areas, traffic-related infrastructure and markings add to a sense of street clutter, which is at odds with the town's historic character. In a few instances, telegraph poles and overhead wires detract from the area's appearance, however, this tends to be focused around the conservation area's extremities and residential streets."

The Working Group **recommends** the addition of the following sentence:
“Listed buildings need to be considered when siting and designing street furniture, waste bins, and signage”

E. Policy on building heights.

The Working Group supported the Policy as set out in the draft CAA:

13.10 POL6: New development schemes should adhere to the following criteria:

- a) The height, mass and bulk must be carefully considered to avoid adverse impact on key views and loss of character. Assessment of views (not necessarily limited to the key views set out in this document) through CGIs and verified views may need to be provided as part of any application to the local planning authority in order to allow for the full assessment of impacts.*
- b) Building heights for each character area should respect the established building heights in the immediate area, as set out for each character area in Chapter 12: Character Areas and Zones in this document. New development should not be excessively tall or dominant, but should present a clear and logical continuation of the existing townscape. New development should not interrupt the overall roofline in the key views set out in Chapter 9: Setting and Views in this document.*
- c) New development schemes should seek to enhance buildings identified as negative contributors in the Buildings Audit map in this document. Designated heritage assets and positive contributors should be preserved, and new development must be carefully designed to respect their scale, height, character, setting and significance.*

The Working group noted the list of “Negative Contributors”, pages 246-247 and **Recommended** that the BT Telephone Exchange (Tower) be added to this list. Given its disproportionate size and proximity to the conservation area, the Telephone Exchange should be specifically excluded for consideration as a precedent when considering the heights of any new buildings.

(Assessment Framework for “Negative Contributors”

8.15 These have been defined as those buildings which detract from the character or appearance of the conservation area and do not provide a positive contribution in their current form. In these cases, there may be the opportunity to enhance the conservation area by appropriate alterations or redevelopment on the existing site. It is expected that a replacement building would actively enhance the conservation area, presenting an appropriate form of development and a well-considered response to the character of the conservation area and site’s unique environs.)

Re paragraph b) above, the Working Group **recommended** the following amendment:

Building heights for each character area should respect the established building heights in the immediate area, (excluding negative contributors), as set out for each character area in Chapter 12: Character Areas and Zones in this document.

F. Management Plan

The Working Group welcomed the measures proposed in the Conservation Management Plan (Section 13) and **recommended** that Article 4 directions be added to the list of measures proposed.

(See paragraphs 3.14 to 3.15 for Article 4 directions)

13.4 REC3. The Working Group, noting that at present only one part-time Conservation Officer is in post, **recommends** that sufficient resources are budgeted and committed to ensure that this ongoing maintenance is achieved.

G. The Newtown Road CAA.

The Working Group had no objection in principle to this proposal but was concerned that part of the proposed area is in the current town Centre CAA. The removal of this part from the proposed Town Centre boundary will lose its current protection under CAA status until such time as the Newtown Road CAA is delivered.

For this reason the Working Group **recommends** that the northern portion of the proposed Newtown Road CAA should remain within the Town Centre CAA until such time as the Newtown Road CAA is completed.

H. References

Relevant documents should include also:

Pevsner for Berkshire 2010 (Yale).

Newbury Buildings Past and Present (1973)

Roy Tubb, *Newbury Road by Road* (2011).

Newbury Town Council

Public Report

To: Planning and Highways Committee

Date of meeting: 20 February 2023

Agenda item No. 4: The Local Area Plan Review Regulation 19 Consultation

Decision Required: To agree the Council's response to The Local Area Plan Regulation 19 Consultation

West Berkshire District Council (WBDC) voted on 1 December 2022 to move the Proposed Submission (Regulation 19) Local Plan Review 2022-2039 to consultation, which is now underway.

The consultation closes at 4.30pm on Friday 3 March 2023.

(Full details available at <https://westberks.gov.uk/local-plan-review>)

This Council made a comprehensive response to the Regulation 18 consultation, which is attached for information. (See appendix 2.2)

The Planning Authority, WBDC, received thousands of responses to the Regulation 18 consultation. Their responses are in turn published as part of the Regulation 19 consultation. The Regulation 19 Consultation runs to 3,144 pages, all available on the WBDC website at the above link.

Of key importance to this Council are the responses of the Planning authority to the issues raised in our submission. For the convenience of members dealing with these long, detailed and complex issues, I have attempted to extract from the 3,144 pages the planning authority's responses to our submission. (See appendix 2.3).

On 19 January 2023 officers from the Planning Policy section, WBDC, attended at a presentation to members of this Council and to the lay members of the Council's Steering Group for the Newbury Neighbourhood Development Plan. They outlined what the Regulation 19 Consultation means and answered questions from the attendees. Notes of this meeting are attached for information. (Appendix 2.4)

This meeting of the Planning and Highways Committee will agree what response, if any, the Town Council wishes to make to the regulation 19 consultation. This publication stage represents what the District Council considers to be the final version of the LAP. The public consultation at this stage is no longer concerned with shaping the content of the document but allows interested parties to comment on the draft Plan and supporting information before it is submitted to the Secretary of State. The District Council seeks representations on behalf of the Secretary of State on legal compliance, compliance with the Duty to Co-operate, and the four tests of

soundness - namely whether the Plan is positively prepared, justified, effective and consistent with national policy.

The District Council will record, categorise and summarise the responses received and submit them to the Planning Inspectorate along with the Local Plan Review and all the evidence. Only those respondents to the regulation19 consultation will be invited to the Inspection by the Planning Inspectorate.

Report Author: Hugh Peacocke, (CEO)

Date: 14 February 2023.

NTC Response to Local Plan Review (Regulation 18)

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Section 1: Introduction & Background

- 1) Do you agree with the proposed policy/site allocation?

It is neither a 'policy' nor a 'site'.

- 2) What are your reasons for supporting or objecting?

This review takes place in the middle of what is an unprecedented set of events that will radically alter the economic life of the country and its neighbours: the Covid-19 pandemic; the end of the BREXIT transition period; the enactment of related legislation (Agriculture and Environment Acts); and declaration of a Climate Emergency by Newbury Town Council (NTC), West Berkshire District Council (WBDC), and the UK Government. Yet almost all the evidence upon which the Local Plan policies presented here are derived pre-date these events.

We therefore question whether it is possible to conclude the process of adopting the new Local Plan before further data is gathered on certain aspects. We are proceeding to comment on the Plan *with that major caveat* and urge the Authority (WBDC) to consider an early review of the evidence and categorically state that some aspects of policy will need amending as soon the impacts of these events are clear.

We refer again to this point in our comments on a number of specific policies.

- 3) What changes are you seeking/what would be your preferred approach?

We would like to see consideration given to an interim review of the newly adopted Local Plan when the impacts of the major changes in context have become clearer in, say, 2024.

In 1.12, we welcome the bringing together of three documents in one. However, we are concerned that the Sustainability Appraisal (SA) and other supporting evidence is not also being actively consulted upon at this time, because in the past it has proved as important to site promoters, developers, and the Planning Inspector as the Local Plan itself. In 1.29 you say it "is intended to be an integral part" of this process, yet there has been no attempt to encourage consultees such as local councils to comment on the SA. We see this as a serious omission. Even the Opposition Members on the Planning Advisory Group were unaware until well into the consultation (on 14th Jan) that the SA was published and at the time of writing (19th Jan) there is no sign of the Infrastructure Delivery Plan and several other key documents.

Section 2: Context

2.6 states "West Berkshire is well connected in transport terms". This is true of most of the district, however not true of Thatcham, which leads us to question the decision to allocate so many more houses in NE Thatcham. Traffic to and from the main road network (M4 / A34) has to pass through Newbury and this adds to congestion. There is a need for a road link –

especially for HGVs – from the east of Thatcham railway station (by bridge over road and canal /river) from A4 to A339, via New Greenham Park. This could continue between the Swan roundabout south of the River Enborne to link with Newbury bypass at Wash Water.

Section 3: Our Vision

1) Do you agree with the proposed policy/site allocation?

Yes.

2) What are your reasons for supporting or objecting?

We strongly support all Strategic Objectives and Objective 1 (Climate Change) in particular but note that for West Berkshire to become carbon neutral by 2030, the contribution from new developments will almost certainly need to go further than current national policy requires in terms of environmental sustainability. The stock of existing buildings will be much harder to retrofit for sustainability than is possible with new developments.

The Council declared a Climate Emergency in 2019. This reinforces the imperative of giving very high priority to environmental sustainability in all aspects of the new Local Plan – if necessary, at the expense of economic and even social sustainability. However, nothing could be more likely to fail to secure social and economic sustainability than failure to tackle climate change, because all the evidence (e.g. The Stern Report of 2006) indicates that the costs of doing so overall and in the long term will increase unless measures are taken early.

Therefore, our approach to achieving this aspect of the Council's Vision will be to consistently give much greater weight to a development's contribution to mitigation of climate change than to being "in keeping with the character and distinctiveness of the area". This applies as much to the AONB as to the rest of the District, where changes implied in the Environment and Agriculture Acts are likely to lead to changes in spatial planning, and in the landscape of rural areas, of greater impact than in recent decades.

3) What changes are you seeking / what would be your preferred approach?

Absolute priority being given to tackling Climate Change.

Over the Plan period, even if all new homes are built to zero carbon standards, there will by 2037 be only a small reduction in the overall carbon footprint of the District. New builds in any one year seldom accounts for more than 1% of total built stock.

That does not mean it is not worth insisting on the highest standards in all new builds, but it does mean that every opportunity to encourage upgrading or replacing poorly insulated and badly maintained buildings (especially homes or buildings that could be homes) must be taken, in addition to permitting new builds.

Whatever can be done through the planning system by amending this Local Plan should be done, in the interests of sustainability. Our Vision is for West Berkshire to set the national

benchmark standard for ‘green prosperity for all’, beginning with its own land at Newbury’s London Road Industrial Estate as an exemplar carbon positive mixed development and matched by a new urban quarter in the Kennet Centre.

Section 4: Spatial Strategy

Policy or Site Ref: SP 1

1) Do you agree with the proposed policy/site allocation?

Yes – but with a changed proposed.

2) What are your reasons for supporting or objecting?

The Spatial Strategy is well balanced, apart from not recognising that it may be necessary to allow some high-density housing within Designated Employment Areas that need modernisation and redevelopment in order to make such redevelopment economically viable.

It seems odd that the LPA is aware that one promoted housing site within a Newbury DEA already has the benefit of planning consent on part of its area for several years’ worth of ‘windfall allowance’, yet this does not feature anywhere in the calculations of housing need and the assessment of overall windfall allowance in the Plan Period takes account only of ‘small sites’ of less than 10 dwellings.

We particularly welcome the supporting text in 4.18, where it refers to “maintaining vibrant and balanced communities” and “opportunity to reduce out-commuting and the need to travel”. This applies as much to service villages in the AONB as elsewhere. The post-Covid environment is likely to mean that even those whose jobs notionally are based outside their home area – or even outside the District – will be able and willing to travel less for work purposes, because working from home for at least part of the time will remain the norm. It is largely for this reason that we wish the Local Plan to be more flexible about new developments of all kinds in and adjacent to the AONB. However, we see no need to amend SP 1 in this respect.

Section 4: Spatial Strategy

SP 2 – NWB AONB

1) Do you agree with the proposed policy?

No

2) What are your reasons for supporting or objecting?

This section is headed “Our Place Based Approach” but goes on to refer to “landscape led” planning. The two phrases are not the same, but “place” is much more than landscape.

“Place” implies the entire perceived human geography: social, economic, and environmental. The AONB is more than mere landscape and the landscape we inherit is the result of centuries of stewardship by local people, who need to live and work in it as a community. We feel that much of the North Wessex Downs has become exclusive to people who live in it but do not work it or particularly wish to share it – even with Nature. Much of it is a prairie, barren of wildlife. It is not a place that future generations living working or visiting from the rest of the District and beyond will enjoy unless we plan differently.

If the people of Newbury, Thatcham, and the outer suburbs of Reading – residents of West Berkshire – are to be expected to continue helping to pay to conserve and enhance the AONB then the Local Plan must accommodate more housing for its villages to remain or become viable, through tourism and new rural businesses offering employment within active travel distance wherever possible.

We welcome the initiative of some villages in the AONB to prepare their own Neighbourhood Plans, noting that this will have to involve community led planning for more homes than are set out in this Local Plan. We trust this will enable some of the pressure on countryside surrounding our towns to be relieved. We do not see that all land outside settlements in the AONB needs protecting from development, even if it isn’t entirely ‘landscape led’. Development should always be sustainable but the social and economic aspects of tackling climate change can and should go alongside the environmental – which is about much more than preserving landscape as it is now.

The conservation of the natural beauty of the landscape should not be the only “primary consideration” in assessment of development proposals in the AONB. The need to combat climate change is just as important in the AONB as anywhere outside it and there may be development proposed that helps tackle climate change but which it could be argued does not enhance the landscape.

Climate change will, if unchecked, affect the landscape of the AONB and the nature of rural life more generally and permanently than even quite major forms of development. Therefore, it is of no less importance to use development proposals that come forward there as a means of tackling climate change than it is elsewhere.

3) What changes are you seeking / what would be your preferred approach?

The last sentence of the first paragraph in the policy should be amended thus:

“The conservation and enhancement of the natural beauty of the landscape will be a prime consideration in the assessment of all development proposals, alongside the contribution made to tackling climate change.”

The second sentence in the next paragraph should be amended thus:

“Planning permission will be refused for major development in the AONB except in exceptional circumstances, and/or where it can be demonstrated to be in the long-term public interest.”

SP 3 – Settlement Hierarchy

We support the settlement hierarchy, especially the need to retain separate identity of adjacent settlements. We regret that the gap between Newbury & Greenham has already almost disappeared but strongly urge that the remaining gap around St Mary's Church Greenham is retained, also the gap east of the Community Hospital which is in Newbury despite having a Thatcham postal address.

The expansion of Newbury settlement area into parts of Cold Ash, Shaw, Speen, and Enborne is of concern, especially with the introduction of CIL and the pressure that new development in those parishes puts on Newbury town centre community services, which are "supporting infrastructure". Therefore, at the earliest opportunity we wish to see a Community Governance Review undertaken by the District Council to adjust parish boundaries, although we realise this is not part of the Local Plan process.

SP 4 – AWEs Aldermaston & Burghfield

We note the major constraints imposed on development and the knock-on effect this has on Newbury and Thatcham in particular.

Section 5: Responding to Climate Change

SP 5

- 1) Do you agree with the proposed policy/site allocation?

Yes – but we wish to strengthen it.

- 2) What are your reasons for supporting or objecting?

We wish to positively encourage developments whose main purpose is to combat climate change, such as renewable energy projects.

It is not enough that development proposals aim to be themselves carbon neutral. The Local Plan must reflect what is said in the Council's Environment Strategy: "any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented".

Developments should aim where possible to be carbon positive, to counterbalance the many existing developments – some still being built out – which are carbon negative. Developments that are specifically to provide renewable energy must be encouraged and supported, especially on Council owned land or when community-led to supply nearby settlements. Such developments should be considered as part of the essential infrastructure of the District and able to be part funded by CIL contributions from other developments.

3) What changes are you seeking/what would be your preferred approach?

In this sentence: “All development should contribute to West Berkshire becoming and staying carbon neutral by 2030” the words “as much as possible” should be added after “contribute”.

Add to the end of SP 5 the following:

“Any development proposals whose main purpose is to reduce the carbon footprint of West Berkshire and which are themselves carbon positive will be looked on favourably, even if they are in conflict with other policies in this Local Plan. In particular, proposals which retrospectively incorporate renewable energy into local homes and communities will be supported.”

SP 6 – Flood Risk

We support this policy but require more clarity around the meaning of when “the benefits of the development to the community outweigh the risk of flooding.”

Reason: For example, when an existing residential property in an area of high flood risk has extremely poor flood protection and is so structurally unsound as to be uninhabitable without extensive refurbishment, unless it has a heritage value the policy should regard the benefits to the community from replacing it with a modern, well insulated dwelling (or dwellings) that fully mitigate flood risk as well as significantly reducing the property’s overall carbon footprint should mean that no sequential test is required. It is unreasonable to expect an owner to undertake work on such a property that costs more than it would to replace it. It can result in land in an otherwise sustainable location remaining out of use indefinitely, which cannot in the interests of the wider community.

Change proposed: In the paragraph beginning “A Sequential Test does not need ...” after “changes of use,” add “a site in a settlement that has remained unoccupied for more than three years”.

We note in 5.14 the supporting text refers to Sequential/Exceptions Tests being needed for sites allocated within this Plan “when the proposed use and/or vulnerability classification” differs from the allocation. The LRIE DEA in Newbury is being promoted heavily for “residential led” redevelopment which ought to mean that Sequential and Exceptions Tests are needed for the whole site, since it already has a Master Plan approved by the Council as landowner. This needs to be stated explicitly somewhere, possibly here.

SP 7 – Design Principles

We support this policy while noting that not all the stated bullet points will be relevant or carry the same weight in any one development.

SP 8 – Landscape Character

We support this policy but would like clarification as to what is meant by “perceptual components” of the character of the landscape. We would also like to see some reference to features that are widely regarded as eyesores in the landscape – even the urban scene – such as the former post office building (the BT Tower) at the junction of Bear Lane and A339. We would dearly like to see something in the Local Plan that provides strong encouragement for development that removes such eyesores.

SP 9 – Historic Environment

We support this policy but wish to add another category to the list of what constitutes “heritage”: “ancient ways”.

Reason: our precious rights of way network is not just an important transport and green infrastructure feature but also very largely an important vestige of the history of the area. Many footpaths, tracks, ‘green lanes’ and drove roads enhance our landscape and need to be preserved for the education as well as enjoyment and practical use by future generations. Too often their heritage value is destroyed with careless urbanising treatment by developers, if they are not altogether obstructed, neglected, or demolished entirely.

Wherever possible all such historic routes should be preserved in the state they are found at the time a site is brought forward for development, or at least as much of them as possible incorporated in the public rights of way network through Definitive Map Modification Orders (DMMOs) to ensure they remain open for use, protected and well managed. This is as important within settlements as in the open countryside.

Proposed changes: add in “f)” after “areas” the words “historic routes”.

SP 10 – Green Infrastructure

We strongly support this policy. However, we wish to have more support for allotments here.

Reason: Developments in urban areas such as Newbury’s settlement area need to make specific provision for allotments at the earliest stage, in consultation with local councils which have statutory responsibility for providing them but have great difficulty finding land for them.

In Newbury, there is currently a large waiting list for plots, and we believe the demand for allotments can only continue to grow as housing densities have increased in recent decades while we now see support for reducing “food miles” and the health and biodiversity value of allotments over that of some other forms of green infrastructure.

Housing developments of more than 100 dwellings with densities greater than 30 should be required to make specific on-site provision for allotments according to the needs of surveys of demand carried out in partnership with surrounding parishes, or to contribute a financial contribution towards off-site provision. All other housing developments should contribute through the parish component of CIL.

Allotment should not be taken as public open space. Rather they should be seen as an addition to public open space (see in the DC 37).

Change proposed: In the supporting text, we wish to see a paragraph that reflects the above.

SP 11 – Biodiversity & Geodiversity

We support this policy but again feel that it ought to mention the biodiversity value of allotments.

SP 12 – Housing Delivery

We neither support nor object to this policy because we are not able to comment adequately on the method of arriving at the target number of dwellings. We note (6.6) that this is liable to change in any case and accept that there has to be a number here.

Some doubts about the current methodology are raised by the inclusion in the Local Plan of some sites that are already largely built out (parts of RSA 6), others that have been recently refused for numbers of dwellings smaller than stated in the Plan (RSA 5), yet more that have had planning consent for some time (remainder of RSA 6, RSA 2). On the other hand, there are sites not specifically mentioned in the Plan at all that have had planning consent including substantial amounts of housing for some years, seemingly because they are within a DEA (Faraday Plaza in LRIE). Nowhere is this explained.

We wish to improve the aim of the policy in terms of climate change to allow loss of existing homes if it can be shown they are not habitable and that they can be replaced in situ with a net long-term gain in terms of tackling climate change and no net loss of habitable dwellings.

Reason: to assist with the aim of achieving carbon neutral by 2030 and also to upgrade properties that have unavoidably high carbon fuel usage, in accordance with the council's Housing Strategy.

Change proposed: add to last sentence "... including replacement of dwellings that are unavoidably expensive to heat by carbon fuels, where the net long-term cost (including cost in use) can be shown to be significantly reduced by re-build and there is no net loss in terms of numbers of dwellings on the development site."

SP 13 – Sites allocated for residential and mixed-use development in Newbury and Thatcham

We do not support this policy. We comment separately on SP 16 & 17.

Reasons: As stated above in SP 12, there appear to be inconsistencies in the selection of sites to include in the Plan. For the Newbury settlement area and a bit beyond, we list all sites in the draft Plan, the HELAA, the 2013 SHLAA and the HSA DPD in a separate document to be read with this response.

Changes proposed:

- 1) Delete these sites and include them instead in “sites with planning consent and/or under construction” in the explanation of total housing numbers required in SP 12 supporting text: RSA2, RSA3, RSA4, RSA6.
- 2) Delete RSA5 altogether as undeliverable.
- 3) Add the following HELAA sites with appropriate RSA numbering, maps, and descriptive text:
 - a) NEW02 land south of Phoenix Centre, Newtown Road – 24 dwellings
 - b) NEW07 former Magistrates Court, Mill Lane – 13 dwellings
- 4) Include NEW01 HELAA site housing numbers taken from promoter’s Council approved Master Plan – minimum 258 dwellings. We would like to see a higher figure of around 550, taking account of the consented development Faraday Plaza and without removing the DEA status of the site in this Plan but accepting that it can deliver both a major increase in employment and significant new housing.

These changes taken together would go a considerable way towards meeting the overall housing need in the District. None of them should be considered ‘windfall’ sites because all have been promoted for housing and are shown in the HELAA as deliverable in this Plan period.

SP 14 – Sites allocated for residential development in Eastern Area

We do not wish to comment.

SP 15 – Sites allocated for residential development in the AONB

We do not wish to comment.

SP 16 – Sandleford

We continue to strongly oppose this policy.

Reason:

- A. Warren Road can never be suitable as an “all vehicle” access for the whole site of upwards of 1500 dwellings and supporting local centre. If Sandleford is ever to be built, it does need all-vehicle access roads on each of three sides: north towards Newbury town centre; east directly onto A339 for southbound traffic; and onto A343 for traffic bound for A34 in both directions. An access road in the middle of Wash Common next to two schools and two churches must be only for emergency vehicles, buses, pedestrians, and cyclists. If there is ever a “Sandleford South”, then extend site south to enable perhaps a fourth all-vehicle access to the whole site could be onto

Andover Road south of the settlement area at Wash Water. However, this is deemed undeliverable within the Plan period. Therefore, Sandleford as described in the SPD should not be considered until an acceptable fourth access route is deliverable.

- B. A 'local centre' should be a business and social 'hub' not primarily retail or employment. Changing travel and working patterns indicate that families will spend much more time in their local communities and less time "at work". Therefore, large developments such as this need to make provision for larger social and all-purpose community support facilities within the site, in partnership with the local council[s]. These must be delivered much earlier in the build-out than has been the case with recent large developments such as Newbury Racecourse and North Newbury.
- C. The Climate Emergency, the Council's Environment Strategy and other precedents (e.g. Wiltshire's recently adopted Local Plan) lead us to believe that a much greater buffer is required around ancient woodland within this site. Unless this is provided, we believe the development will be contrary to the aims of the Biodiversity policy SP11.

Change Proposed:

We do not believe this policy should remain in the Local Plan without a complete review because it has been shown to be undeliverable even before the Climate Emergency was announced and is certainly not deliverable now unless the SPD is revised to reflect the emerging Local Plan policies.

SP 17 – Thatcham North East Strategic Housing

We will not comment on this in any detail but have grave reservations about the need for such a large housing development in a part of the District that is poorly connected to the wider transport network. We fear it will impact upon traffic congestion throughout the Newbury & Thatcham Plan Area and beyond and we have not seen anything in the supporting evidence to alleviate those fears. We reserve judgement until the Regulation 19 consultation stage.

SP 18 – Housing Type & Mix

We broadly support this policy.

Reason: We wish to strengthen support for community needs housing: self-build, co-housing, etc. The housing market lacks innovation and fails to meet a wide range of needs.

We believe that housing designed mainly by and built for those who intend to live in it themselves is generally of a better quality than what the major volume home builders produce, because their main duty is maximising shareholder profit, and they have to an unhealthy extent dominated the land market.

Change Proposed: In last paragraph, change “may” to “will normally” in first line.

Amend 6.53 in supporting text by adding sentence at end: “The definition of ‘local community group’ includes any such group including members having a connection to West Berkshire.”

SP 19 – Affordable Housing

We strongly support this policy.

Reason: The reference to the need for all affordable housing to be “built to net zero carbon standards” is welcomed. For those who cannot afford market rents or mortgages, the cost of heating and powering their homes is especially important. Provided similar policies are adopted nationally by LPAs, economies of scale for developers should ensure that the cost of making homes both affordable and sustainable in climate terms should not be excessive.

SP 20 – Economic development

We do not support this policy.

Reason: There is no reference to the impact of Covid-19. All evidence pre-dates the pandemic. Whilst the implications for strategic spatial planning are not yet clear, evidence is mounting that casts doubt on the need for new office floor space and indicates that much employment will be largely home-based. In particular, the concept of the “15-minute neighbourhood” is gaining support within the planning profession.

Change Proposed: To be discussed. None at this time

SP 21 – Sites allocated for Economic Development

We wish to add Newbury Showground adjacent to J13 as an additional storage and distribution area.

Reason: This would reduce the number of HGVs travelling into and through Newbury along the A4 from west and north in particular and enable other employment sites within Newbury to be redeveloped for commercial and industrial purposes. Junction 13 is the obvious hub for distribution networks and the Showground seems likely to undergo viability issues, as well as causing severe traffic congestion on local roads at certain times.

Some light industrial and other commercial uses could also be relocated to the Showground from LRIE (possibly temporarily) while that site is redeveloped.

SP 22 – Transport

We support this policy.

SP 23 – Infrastructure requirements and delivery

We cannot be expected to comment on this policy until the Infrastructure Delivery Plan is published.

NON-STRATEGIC HOUSING SITE ALLOCATIONS

We only comment in detail on those that are within or adjacent to Newbury Settlement Area. However, in general we believe that a few more small sites need to be identified outside of major urban areas in Rural Service Centres and Service Villages, for reasons given above (SP nn). We would prefer these to come forward through community led neighbourhood planning.

RSA1 Kennet Centre

We support this allocation.

RSA2, 4 & 6

These sites all have planning consent and much of RSA6 is already built and occupied. We do support their allocation in the Plan. In policy terms, the consented planning applications seem to make their inclusion superfluous.

Reason: see SP 13 above.

Policy DC1 – Development in the Countryside

Make explicit reference to zero carbon homes.

Reason: To allow for innovative solutions in response to climate change.

Change Proposed: In 9.7 of the supporting text and especially in relation to ‘c’, ‘d’ and ‘j’ of the listed ‘criteria’ in the policy, add the following sentence:

“Developments that achieve or closely approach zero carbon or better in terms of their overall impact in any location within the countryside are likely to be looked on favourably, if they also fit one or more of the above criteria.”

Cross-ref. to DC23 & DC33.

DC 2 – Health & Wellbeing

We support this policy.

Reason: This is a vital aspect of “place making”. However, it needs to take account of the whole life of the development, its surroundings, and future occupants - not just initial build quality and residents.

DC 3 – Building Sustainable Homes & Businesses

We support the approach to homes having a nationally recognised and measurable standard of quality. However, we do not support the treatment of Renewable Energy as merely a class of Business: category “3”.

Reason: Renewable Energy should be a separate DC policy on its own to highlight its importance. There are ‘developments’ which are purely for renewable energy, e.g. solar arrays, micro-hydro and wind turbines. Under ‘3’ currently there is ‘A’ which deals with renewable energy as part of a residential or commercial development. ‘B’ is for renewable energy developments that are ‘stand-alone’. These should be in the Local Plan but as a separate category with its own policy, in particular to cover schemes in ‘countryside’. This should be referenced in the proposed amendment to SP5 (see above) and only the sub-category “A” should be part of this policy.

Change Proposed: New DC policy linked to an amended SP5 and worded as ‘3.B’ here. The policy should also explicitly encourage developments that have local community backing and/or where the energy and/or revenue generated from the development will accrue to homes and/or businesses in West Berkshire.

The Supporting Text from 10.22 to 10.24 should be moved to accompany the new policy.

DC 4 - Environmental nuisance and pollution control

DC 5 - Water quality

DC 6 - Water resources

DC 7 – Air Quality

DC 8 – Conservation Areas

DC 9 – Listed Buildings

DC 10 – Non-designated Heritage Assets

DC 11 – Registered Parks and Gardens

DC 12 – Registered Battlefields

DC 13 - Assets of Archaeological Importance

DC 14 – Trees, woodland & hedgerows

Include provision in this policy for large tree planting schemes in or near settlements to have prior planning permission.

Reason: Large areas of new tree planting near to residential areas should require planning permission. They can cause harm to the amenity of nearby homes.

Change proposed: Add to end of policy, in separate paragraph:

“Whilst the Council supports the planting of trees in the countryside, which is normally not a matter for the LPA, large areas of tree planting can over time cause harm to the amenity of nearby residential properties. Therefore, schemes for more than [n] trees capable of reaching a height in excess of [m] metres may require planning consent if within a settlement area or if the nearest settlement boundary is within [x] metres of any part of the proposed planted area.

Delivering new Housing

DC 15 – Entry level exception schemes

We support this policy.

Reason: Although the policy is unlikely to be needed in Newbury or Greenham since all land suitable for development is either already allocated for housing or needed for public open space, or protected in some other way from development, it is needed adjacent to many other settlements.

DC 16 – Rural Exception Housing

This policy is not applicable to the Newbury settlement area or the rest of Newbury & Greenham.

DC 17 – Self and custom build

We strongly support this policy.

Reason: see SP 18. Quality of housing is generally higher when designed and built for an end user. We would like to see more publicity given to the policy, because surveys by the national association for self- and custom-built housing show that few people know about these as a separate category and it should be actively promoted.

DC 18 – Specialised housing

We support this policy.

DC 19 – Gypsies, travellers, and travelling showpeople

We support this policy apart from the inclusion of the need to be on previously developed land which we feel is not at all necessary. Whilst desirable, the words “previously developed” [land] should be prefaced by “high quality agricultural or public open space (or access) – or (preferably) -”.

DC 20 – Retention of mobile home parks

We support this policy.

DC 21 – Residential use of space above shops and offices

We support this policy. However more consideration needs to be given to the need for storage of cycles and bins, possibly on a communal basis.

DC 22 – Housing Related to Rural Workers

This policy is not applicable to Newbury or Greenham although many “rural workers” are currently living in the Newbury settlement area and we support it.

However, as: “The Council is responsible for the local highway, cycle and walking, and public right of way networks as well as supporting public transport networks..... All development proposals will be required to demonstrate that they do not adversely affect these networks or that they can mitigate the adverse impact.”, we would like to add: “In the case of active travel networks, we wish to see opportunities to enhance them adopted. We expect all major development proposals to demonstrate how they have considered ways of improving local permeability into, out of and through their developments.”

DC 23 – Conversion and/or re-use of existing redundant/disused buildings

We do not support this policy as it stands.

Reason: There should be more flexibility to re-use buildings that are not structurally sound in their entirety. To We wish to preserve - or restore and re-use - structures in the countryside that reflect the local character and to remove eyesores.

Change Proposed: Delete ‘(i)’ and renumber. Add in Supporting text:

“Conversion of a building that is partially but not wholly structurally sound to a residential use will not normally be allowed unless the building is itself of heritage value, its retention for another use cannot be justified and re-use will enhance its heritage value or that of its setting.”

Para 11.49 in the existing Supporting Text is very hard to understand as written. In any case, it might be itself redundant if the above amendment is accepted.

DC 24 – Replacement of Existing Dwellings in the Countryside

This policy is not applicable to Newbury or most of Greenham, but we support it.

DC 25 – Extension of residential curtilages in the countryside

We support this policy although it does not apply to Newbury or most of Greenham.

DC 26 – Sub-division of Existing Dwellings in the Countryside

We support this policy although it does not apply to Newbury or most of Greenham.

DC 27 – Residential extensions

We support this policy.

DC 28 – Residential annexes

We support this policy.

DC 29 – Residential space standards

We support this policy.

DC 30 – Residential amenity

We support this policy.

DC 31 – DEAs

We broadly support this policy, but it is unclear what is meant by “small scale commercial and services uses” or why they might not be permitted in DEAs.

Reason: Every kind of “commercial and services” land use would seem to involve “employment”. So, it is unclear why there is a need for any policy to control it. It might even be encouraged, because if (for example) it means personal services like hairdresser or food takeaway food, then locating such businesses within a DEA surely should reduce the need of customers working in that DEA to travel to/from the DEA to secure those services.

An entire rethink of “business uses” within the Local Plan appears to be needed. So much “business” now takes place within the home. It makes the separation of “residential” and “non- residential” property for all purposes (including local taxation) seem outdated. However, this is a matter beyond planning policy although linked to it.

There should perhaps be some reference to “live-work” units here – or in a separate policy.

Change Proposed: None proposed at this stage. Examples are needed to show why this aspect of the policy is required, especially with the major changes expected to the nature of “offices”. However, that part which allows for “Outside of DEA” business uses is supported, although the use of “(a)” when there is no “(b)” is redundant.

DC 32 – Supporting the Rural Economy

We support the policy. However, there is lack of clarity about the definition or “rural” in this context. Market towns like Newbury, Thatcham and Hungerford are integral to the “rural

economy” but the policy appears to be intended to relate purely to businesses located in what in planning terms is “open countryside” and not in “settlements” at or near the top of the hierarchy used in this Plan.

Reason: this policy should not exclude development in larger settlements across the District which genuinely support “rural business” (e.g. breweries) but should make it clearer under what circumstances a development proposal that doesn’t need to be located in the countryside might be permitted.

Change proposed: we do not at this point have a suggested form of words.

DC 33 – Redevelopment of previously developed land in the countryside

We support this policy, but it should be made clear that it applies not just to land with buildings on it but also to land where there may be no trace or record of what building[s] previously existed. All that should be needed to enable development to occur in accordance with DC 1 and this policy is the existence of a hard man-made foundation of no archaeological value.

Proposed changes:

- 1) In the first line of the policy delete “existing buildings on”
- 2) Start “i)” with “The land or any existing buildings are ...”

DC 34 – Equestrian/racecourse industry

We support this policy, apart from concern about the possible impact of Racecourse events (noise) on neighbouring residential land. not in policy

Reason: There has been a significant increase in evening events at Newbury Racecourse that are not related to racing, at the same time as a very large increase in numbers of homes on adjacent land within the Racecourse’s ownership. This could harm the amenity of residents who may have been unaware of the frequency and type non-racing activities there.

We are also concerned about the more general disregard for the interests of their leaseholders and occupiers exhibited by the Racecourse and by the ‘gagging clause’ in their lease to property owners which seems to disenfranchise them with respect to this. Whilst this may not be entirely a planning matter, we believe it has an impact on how future proposals for development by the Racecourse should be regarded.

Change Proposed: Add to end of Supporting Text for Newbury Racecourse:

“Development proposals in support of events not related to the racing industry and likely to occur mainly in evenings or at weekends must demonstrate community support and sensitivity to noise and traffic impacts on the neighbourhood and highway network.”

DC 35 – Transport infrastructure

- a. Minor change regarding re-use of former railway lines
- b. Aim to reduce need to travel by car

Reason:

- a. The Hermitage to Hamstead Norreys cycle path has recently been completed. The current focus is the link between Hermitage and Newbury, which will require considerably most funding but also potentially have much greater benefits.
- b. The ideal transport policy would not rely on private car ownership at all. The concept of a “15-minute neighbourhood” applied to a sustainable modern settlement in a Climate Emergency would require all daily needs to be met without a car.

Change Proposed:

- a. In 12.48 of Supporting Text, in last sentence replace “re-use the alignment” with “replace that part”; also delete all after “railway line to provide” and replace with: “... between Hermitage and Newbury, a route for both leisure and potentially commuter use, incorporating existing minor roads and bridle ways as necessary.”
- b. Somewhere in Supporting Text – preferably at the end of first para (12.44) or immediately after it, there needs to be a statement such as: “At all stages in planning for a major development, proposals should consider ways of reducing the need to travel, especially during the working day. Where possible, all facilities needed on a daily basis should be located within a 15-minute journey time of a new place of employment or residence by means other than the private car. If necessary, facilities should be provided on site.”

DC 36 – Parking & Travel Plans

- a. Travel Plans should be in a separate policy.
- b. Add reference to on-road parking outside Residents Parking Zones

Reason:

- a. There is much more to travel planning than relates to parking. It needs a separate policy because of its importance to spatial planning of new developments.
- b. With new on-road cycle lanes being introduced with the LCWIPs, we need to protect roadsides that are designated for cyclists as no-parking for all vehicles.

Change Proposed:

- a. Completely re-word to emphasise that travel needs to be a core consideration in any major development, whether there is land for parking or not. It is the need for vehicular travel that Climate Emergency requires consideration of. This would then obviate the need for the first sentence in this part of Policy DC 36.
- b. Add new paragraph immediately above current “Travel Plans”: “Where any proposed development abuts a designated primary cycle route on a road that has insufficient width to provide that route segregated from vehicular traffic or pedestrians, the development must not result in additional on-road parking and should where possible enable any existing on-road parking to be accommodated within the site. This applies outside Residents Parking Zones and even beyond settlement boundaries – but not where speed limits are below 30mph.”

DC 37 – Public Open Space

We support a generous provision of public open space in all housing developments.

‘Public’ means public. Public space should not be exclusive to any specific development but rather should include the wider community.

DC 38 – Broadband, Fibre to the premisses

We support and encourage this policy.

We would like to see broadband infrastructure funded by the CIL pot.

DC 39 – Provision of local Shops, farm shop

Developers must provide a more generous and flexible allocation of land for community facilities and provide it earlier in the build – done in partnership with the local council(s).

LOCAL PLAN REVIEW – DRAFT HOUSING SITE ALLOCATIONS

The sites selected for the Local Plan Review (LPR) are a sub-set of those in the Housing & Economic Land Availability Assessment (HELAA). Alternatively they might be carried forward from the current Core Strategy (CS) or Housing Site Allocations (HSA) Development Plan Document (DPD). The [interactive HELAA map](https://info.westberks.gov.uk/helaa) indicates where they are and also where the many other non-selected sites are. Further details of HELAA at <https://info.westberks.gov.uk/helaa>

Some sites were also promoted during the previous Local Plan (2006-26) and are listed in the “Strategic Housing Land Availability Assessment” (SHLAA). Where the Planning Authority had a different view of them then compared to now, we may wish to comment.

LPR ref.	HELAA/HSA/ CS ref.	Site name	Town Ward	No.dw.	Response by NTC (TV suggestion)
SP16	CS3	Sandleford Park	Wash Common	1500	See SP16
-	NEW8 / NEW019	Sandleford South	Wash Common	500 / 195	We are not asked to comment, nor should we at this stage. [Listed here because site promoter is likely to push for inclusion in new LP. Monitor.]
RSA1	NEW3	Kennet Centre	Westfields	228	We strongly support this site but have some reservations about the heights of some buildings proposed in the draft Master Plan. We note that currently there is no housing within the site, which is 100% town centre uses. We support the proposed mix of uses, the use of ground source heat pumps and the degree of vitality that should come with a large residential component.
RSA2	NEW012	Land N of Newbury Coll.	Wash Common	15	We note this now has planning consent for 16 dwellings.
RSA3	NEW042	Off Bath Rd / Station Rd	(Speen)	100	We note this site now has outline consent for up to 93 dwellings and full consent for 11 of these.
RSA4	NEW045	Coley Farm	(Cold Ash)	75	We note this now has planning consent for 75 dwellings. It is entirely within Cold Ash parish, apart from a play area. We wish to see an

LPR ref.	HELAA/HSA/ CS ref.	Site name	Town Ward	No.dw.	Response by NTC (TV suggestion)
					allotment site on land just outside the settlement boundary to the northeast
RSA5	GRE6	Off New Road	(Greenham)	12	We note that planning permission was refused in 2018 for only 4 dwellings. This site in Greenham parish should be removed from the Local Plan.
RSA6	NEW047	Betw, New Rd., Greenham Rd. & retail park	Eastfields (Greenham)	255	This is four distinct sites almost closing the Newbury/Greenham 'green gap'. All have full planning consent; the northernmost one is largely completed; the westernmost is in Newbury but the rest are in Greenham. According to the HSA DPD, they were to have been master planned together – but weren't. There are two possible allotment sites on land adjacent to developed areas in the Greenham part.
7.6 12.7 Appx. 6	NEW01	LRIE	Clay Hill	< 528	<p>Site is entirely owned and promoted by West Berks Council.</p> <p>A large part (Faraday Plaza) has had planning consent since 2010 (renewed after appeal in 2016) which includes 160 dwellings but also accommodates a 10-fold increase in employment. The District Council has approved a Master Plan that aspires to have at least 250 dwellings, yet the site does not feature in this Local Plan other than as a DEA.</p> <p>We do not understand this.</p> <p>We broadly support the redevelopment plans, apart from the removal of the football facilities, which are registered as an Asset of Community Value.</p>

LPR ref.	HELAA/HSA/ CS ref.	Site name	Town Ward	No.dw.	Response by NTC (TV suggestion)
	NEW02	Next to Phoenix Centre Newtown Rd	Eastfields	24	We support this site and wish to see it in the Local Plan, if possible as 100% affordable dwellings.
	NEW05 / NEW019	Off Andover Rd next to R Enborne	Wash Common	200	We are glad that this site is now not regarded as deliverable and not in the Local Plan.
	NEW06	E. of Hill Road off Speen Lane	(Speen)	22	We are glad that this site is not in the Local Plan.
	NEW07	Former Magistrates Court, Mill Lane	Eastfields	13	This is a highly sustainable site, ideal for social housing, available now and 'potentially developable' We wish to see it included in the Local Plan.
	NEW09	E of Community Hospital	Clay Hill	56	Because it would close the 'green gap' between Newbury and Thatcham, we are glad that this site is not in the Local Plan.
	NEW10	Adj. Oxford Rd	Speenhamland	23	We are glad that this site is not in the Local Plan.
	GRE1	Pinchington Lodge	(Greenham)	105	We are glad that this site is not in the Local Plan.
	GRE2	Gorse Covert, Sandleford	Wash Common	147	We are glad that this site is not in the Local Plan.
	GRE3	S of Newbury Racecourse	(Greenham)	161	We are glad that this site is not in the Local Plan
	GRE4	Land at Abbotswood, Newtown Road	Wash Common	8	We are glad that this site is not in the Local Plan
	GRE5	S of Capability Way	(Greenham)	6	We are glad that this site is not in the Local Plan
	GRE7	Greenham Lodge mobile home park	(Greenham)	40	Would result in loss of mobile homes. We are glad that this site is not in the Local Plan.
	GRE10	S of Pigeons Farm Rd.	(Greenham)	15	We are glad that this site is not in the Local Plan Potentially developable.

LPR ref.	HELAA/HSA/ CS ref.	Site name	Town Ward	No.dw.	Response by NTC (TV suggestion)
	GRE11	Newbury & Crookham Golf Club	(Greenham)	12	No comment
	GRE12	W of Newtown Rd and S of GRE4	(Greenham)	16	We are glad that this site is not in the Local Plan.

Respondent	Response	Council Response
<p>Newbury Town Council (lpr1100)</p> <p>Newbury Town Council (lpr2275)</p>	<p>This review takes place in the middle of what is an unprecedented set of events that will radically alter the economic life of the country and its neighbours: the Covid-19 pandemic; the end of the BREXIT transition period; the enactment of related legislation (Agriculture and Environment Acts); and declaration of a Climate Emergency by Newbury Town Council (NTC), West Berkshire District Council (WBDC), and the UK Government. Yet almost all the evidence upon which the Local Plan policies presented here are derived pre-date these events.</p> <p>We therefore question whether it is possible to conclude the process of adopting the new Local Plan before further data is gathered on certain aspects. We are proceeding to comment on the Plan with that major caveat and urge the Authority (WBDC) to consider an early review of the evidence and categorically state that some aspects of policy will need amending as soon the impacts of these events are clear.</p> <p>We refer again to this point in our comments on a number of specific policies.</p> <p>We would like to see consideration given to an interim review of the newly adopted Local Plan when the impacts of the major changes in context have become clearer in, say, 2024. In 1.12, we welcome the bringing together of three documents in one. However, we are concerned that the Sustainability Appraisal (SA) and other supporting evidence is not also being actively consulted upon at this time, because in the past it has proved as important to site promoters, developers, and the Planning Inspector as the Local Plan itself. In 1.29 you say it “is intended to be an integral part” of this process, yet there has been no attempt to encourage consultees such as local councils to comment on the SA. We see this as a serious omission. Even the Opposition Members on the Planning Advisory Group were unaware until well into the consultation (on 14th Jan) that the SA was published and at the time of writing (19th Jan) there is no sign of the Infrastructure Delivery Plan and several other key documents.</p>	<p>Comments noted.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Proposed Submission LPR.</p> <p>The LPR is a long term strategy to 2039, during which time a review will be conducted every 5 years.</p> <p>An interim SA report was published for consultation at the same time as the emerging draft of the LPR in December 2020.</p> <p>The Draft IDP was published on the Council’s website in October 2021. It is currently being updated and will be published alongside the Proposed Submission LPR.</p>
<p>Newbury Town Council (lpr2274)</p>	<p>Para 2.6 states “West Berkshire is well connected in transport terms”. This is true of most of the district, however not true of Thatcham, which leads us to question the decision to allocate so many more houses in NE Thatcham. Traffic to and from the main road network (M4 / A34) has to pass through Newbury and this adds to There is a need for a road link – especially for HGVs – from the east of Thatcham railway station (by bridge over road and canal /river) from A4 to A339, via New Greenham Park. This could continue between the Swan roundabout south of the River Enborne to link with Newbury bypass at Wash Water.</p>	<p>Comments noted.</p> <p>Paragraph 2.6 of the Emerging Draft LPR provides an overview of the District as a whole. It is acknowledged that some parts of the area will have better access to the rail and strategic road network than others.</p> <p>The Council will be undertaking a review of its Local Transport Plan following the Local Plan Review and some of the issues raised are more appropriately considered as part of that process. Other detailed comments will be dealt with as part of the Council’s response to comments made under policy SP17.</p>

<p>Newbury Town Council (lpr2273)</p>	<p>Vision is supported.</p> <p>We strongly support all Strategic Objectives and Objective 1 (Climate Change) in particular but note that for West Berkshire to become carbon neutral by 2030, the contribution from new developments will almost certainly need to go further than current national policy requires in terms of environmental sustainability. The stock of existing buildings will be much harder to retrofit for sustainability than is possible with new developments. The Council declared a Climate Emergency in 2019. This reinforces the imperative of giving very high priority to environmental sustainability in all aspects of the new Local Plan – if necessary, at the expense of economic and even social sustainability. However, nothing could be more likely to fail to secure social and economic sustainability than failure to tackle climate change, because all the evidence (e.g. The Stern Report of 2006) indicates that the costs of doing so overall and in the long term will increase unless measures are taken early.</p> <p>Therefore, our approach to achieving this aspect of the Council's Vision will be to consistently give much greater weight to a development's contribution to mitigation of climate change than to being "in keeping with the character and distinctiveness of the area". This applies as much to the AONB as to the rest of the District, where changes implied in the Environment and Agriculture Acts are likely to lead to changes in spatial planning, and in the landscape of rural areas, of greater impact than in recent decades.</p> <p>Absolute priority being given to tackling Climate</p> <p>Over the Plan period, even if all new homes are built to zero carbon standards, there will by 2037 be only a small reduction in the overall carbon footprint of the District. New builds in any one year seldom accounts for more than 1% of total built stock.</p>	<p>The support is noted.</p> <p>The comments on climate change are noted. The LPR seeks to go as far it is believed we can within the current legislation and the planning system. This is set out in further detail in Policies SP5 and DM3 of the Emerging Draft LPR.</p>
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(Proposed Submission LPR Policy: SP1 Spatial Strategy)

Respondent	Response	Council response
Newbury Town Council (lpr2272)	<p>We agree with the policy – but with a changed proposed.</p> <p>The Spatial Strategy is well balanced, apart from not recognising that it may be necessary to allow some high-density housing within Designated Employment Areas that need modernisation and redevelopment in order to make such redevelopment economically viable.</p> <p>It seems odd that the LPA is aware that one promoted housing site within a Newbury DEA already has the benefit of planning consent on part of its area for several years' worth of 'windfall allowance', yet this does not feature anywhere in the calculations of housing need and the assessment of overall windfall allowance in the Plan Period takes account only of 'small sites' of less than 10 dwellings.</p> <p>We particularly welcome the supporting text in 4.18, where it refers to "maintaining vibrant and balanced communities" and "opportunity to reduce out-commuting and the need to travel". This applies as much to service villages in the AONB as elsewhere. The post-Covid environment is likely to mean that even those whose jobs notionally are based outside their home area – or even outside the District – will be able and willing to travel less for work purposes, because working from home for at least part of the time will remain the norm. It is largely for this reason that we wish the Local Plan to be more flexible about new developments of all kinds in and adjacent to the AONB. However, we see no need to amend SP 1 in this respect.</p>	<p>Comments noted.</p> <p>Designated Employment Areas are considered to represent coherent areas of employment land containing established concentrations of office, industrial and warehousing development. These areas allow business uses to locate together, complement and support one another, with relatively little disturbance to surrounding residential areas. It is therefore important to ensure the role and function of each DEA is maintained and strengthened to enhance economic growth so as to prevent their economic function being diluted and potentially compromised through amenity concerns or a lack of competitiveness.</p> <p>Presumably Newbury Town Council are referring to the London Road Industrial Estate in Newbury, where there is a permission for 160 residential units on Land off Faraday and Kelvin Road. The calculation of housing need takes no account of sites – it is based on household projections with an uplift based on local affordability. The housing supply, however, includes these 160 units as outstanding permissions. The windfall allowance is for sites that are not yet permitted or even identified.</p> <p>Comments regarding development in the AONB are noted.</p> <p>However, the conservation and enhancement of the natural beauty of the landscape will be the primary consideration in the assessment of development proposals in the AONB.</p>

Emerging Draft LPR Policy: SP2 North Wessex Downs AONB
(Proposed Submission LPR Policy: SP2 North Wessex Downs AONB)

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2271)	<p>This section is headed “Our Place Based Approach” but goes on to refer to “landscape led” planning. The two phrases are not the same, but “place” is much more than landscape.</p> <p>“Place” implies the entire perceived human geography: social, economic, and environmental. The AONB is more than mere landscape and the landscape we inherit is the result of centuries of stewardship by local people, who need to live and work in it as a community. We feel that much of the North Wessex Downs has become exclusive to people who live in it but do not work it or particularly wish to share it – even with Nature. Much of it is a prairie, barren of wildlife. It is not a place that future generations living working or visiting from the rest of the District and beyond will enjoy unless we plan differently.</p> <p>If the people of Newbury, Thatcham, and the outer suburbs of Reading – residents of West Berkshire – are to be expected to continue helping to pay to conserve and enhance the AONB then the Local Plan must accommodate more housing for its villages to remain or become viable, through tourism and new rural businesses offering employment within active travel distance wherever possible.</p> <p>We welcome the initiative of some villages in the AONB to prepare their own Neighbourhood Plans, noting that this will have to involve community led planning for more homes than are set out in this Local Plan. We trust this will enable some of the pressure on countryside surrounding our towns to be relieved. We do not see that all land outside settlements in the AONB needs protecting from development, even if it isn’t entirely ‘landscape led’.</p> <p>Development should always be sustainable but the social and economic aspects of tackling climate change can and should go alongside the environmental – which is about much more than preserving landscape as it is now.</p> <p>The conservation of the natural beauty of the landscape should not be the only “primary consideration” in assessment of development proposals in the AONB. The need to combat climate change is just as important in the AONB as anywhere outside it and there may be development proposed that helps tackle climate change but which it could be argued does not enhance the landscape.</p>	<p>Comments noted.</p> <p>SP2 is a strategic policy which sets out the Council’s overall planning policy approach to the AONB. This has to be set within a national planning policy context and be read alongside all the other policies in the LPR. This is set out in para 1.7 of the Emerging Draft LPR. There are other policies for instance which explain in more detail the Council’s approach to the distribution of housing, green infrastructure, economic development and the response to climate change.</p> <p>The Council’s approach to residential development in the countryside will be set out in Policy DM1 of the Proposed Submission LPR. This applies across the whole of the District.</p> <p>Paragraph 4.23 of the Emerging Draft LPR sets out that the conservation and enhancement of natural beauty is the primary purpose of AONB designation as set out in the Countryside and Rights of Way Act 2000.</p>

Emerging Draft LPR Policy: SP3 Settlement Hierarchy

Respondent	Response	Council Response
Newbury Town Council (lpr2270)	<p>We support the settlement hierarchy, especially the need to retain separate identity of adjacent settlements. We regret that the gap between Newbury & Greenham has already almost disappeared but strongly urge that the remaining gap around St Mary's Church Greenham is retained, also the gap east of the Community Hospital which is in Newbury despite having a Thatcham postal address.</p> <p>The expansion of Newbury settlement area into parts of Cold Ash, Shaw, Speen, and Enborne is of concern, especially with the introduction of CIL and the pressure that new development in those parishes puts on Newbury town centre community services, which are "supporting infrastructure". Therefore, at the earliest opportunity we wish to see a Community Governance Review undertaken by the District Council to adjust parish boundaries, although we realise this is not part of the Local Plan process.</p>	<p>Comments noted, Policy DM1: Development in the Countryside sets out a presumption against development outside of adopted settlement boundaries. The Council recognises in the LPR the pressure for development, and cumulative impact is an important consideration in the areas which face this pressure, as incremental changes when viewed collectively can significantly change the character of a landscape.</p> <p>Development which does not provide adequate and timely infrastructure will not be supported. An Infrastructure Delivery Plan (IDP) has been produced to support the LPR, is a 'living document' and will be updated regularly updated in consultation with infrastructure providers.</p> <p>As noted, parish boundary amendments cannot be considered through the LPR. No change required.</p>
Emerging Draft LPR Policy: SP4 Atomic Weapons Establishment (AWE) Aldermaston and AWE Burghfield		
Newbury Town Council (lpr2269)	<p>Acknowledge the constraint put on development and the knock on effect for Newbury and Thatcham</p> <p>Given that there is no evidence to indicate that this consultation with the ONR has commenced, it is necessary for West Berkshire Council to put forward alternative sites for the second phase of Draft Local Plan should future discussions with ONR restrict development.</p>	Response noted

(Proposed Submission LPR Policy: SP5 Climate Change)

Respondent	Response	Council Response
<p>Newbury Town Council (lpr2268)</p>	<p>Yes we support it – but we wish to strengthen it.</p> <p>We wish to positively encourage developments whose main purpose is to combat climate change, such as renewable energy projects.</p> <p>It is not enough that development proposals aim to be themselves carbon neutral. The Local Plan must reflect what is said in the Council's Environment Strategy: "any carbon dioxide gas emissions within West Berkshire will be balanced with an equivalent of emissions that are either offset or prevented".</p> <p>Developments should aim where possible to be carbon positive, to counterbalance the many existing developments – some still being built out – which are carbon negative. Developments that are specifically to provide renewable energy must be encouraged and supported, especially on Council owned land or when community-led to supply nearby settlements. Such developments should be considered as part of the essential infrastructure of the District and able to be part funded by CIL contributions from other developments.</p> <p>In this sentence: "All development should contribute to West Berkshire becoming and staying carbon neutral by 2030" the words "as much as possible" should be added after "contribute".</p>	<p>Comments noted.</p> <p>The Environment Strategy is much broader in its scope than just new development notwithstanding the importance of new development being carbon neutral or better. For instance, development cannot offset carbon emissions from resident's use of transport as a consequence of house building. However, the Local Plan Review policy does seek to develop in the most sustainable locations.</p> <p>The Council believes that this policy together with other related policies referred to within the Plan, is clear in its intent with respect to tackling climate change through sustainable development.</p> <p>Proposed Submission LPR Policy DM4 Building Sustainable Homes and Businesses addresses the requirement for renewable energy in new developments.</p> <p>The Council considers the addition of "as much as possible" would weaken the policy.</p>

(Proposed Submission LPR Policy: SP6 Flood Risk)

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2267)	<p>We support this policy but require more clarity around the meaning of when “the benefits of the development to the community outweigh the risk of flooding.”</p> <p>Reason: For example, when an existing residential property in an area of high flood risk has extremely poor flood protection and is so structurally unsound as to be uninhabitable without extensive refurbishment, unless it has a heritage value the policy should regard the benefits to the community from replacing it with a modern, well insulated dwelling (or dwellings) that fully mitigate flood risk as well as significantly reducing the property’s overall carbon footprint should mean that no sequential test is required. It is unreasonable to expect an owner to undertake work on such a property that costs more than it would to replace it. It can result in land in an otherwise sustainable location remaining out of use indefinitely, which cannot in the interests of the wider community.</p> <p>Change proposed: In the paragraph beginning “A Sequential Test does not need ...” after “changes of use,” add “a site in a settlement that has remained unoccupied for more than three years”.</p> <p>We note in 5.14 the supporting text refers to Sequential/Exceptions Tests being needed for sites allocated within this Plan “when the proposed use and/or vulnerability classification” differs from the allocation. The LRIE DEA in Newbury is being promoted heavily for “residential led” redevelopment which ought to mean that Sequential and Exceptions Tests are needed for the whole site, since it already has a Master Plan approved by the Council as landowner. This needs to be stated explicitly somewhere, possibly here.</p>	<p>Comments noted.</p> <p>PPG at paragraph 036 (ref id: 7-036-20220825) states that identifies examples of wider sustainability benefits to the community, and these include:</p> <ul style="list-style-type: none"> • The re-use of suitable brownfield land as part of a local regeneration scheme; • An overall reduction in flood risk to the wider community through the provision of, or financial contribution to, flood risk management infrastructure; and • The provision of multifunctional Sustainable Drainage Systems that integrate with green infrastructure, significantly exceeding NPPF policy requirements for Sustainable Drainage Systems; <p>The PPG requires a sequential risk-based assessment to the location of development. Application of the sequential approach in the plan-making process, in particular application of the Sequential Test, will help ensure that development can be safely and sustainably delivered.</p> <p>The PPG outlines that the Sequential Test does not need to be applied for individual developments on sites which have been allocated in development plans through the Sequential Test, or for applications for minor development or change of use (except for a change of use to a caravan, camping or chalet site, or to a mobile home or park home site).</p> <p>The PPG does not state that a sequential test is not required for sites in settlements that have remained unoccupied for more than three years.</p> <p>The Exception Test is a method to demonstrate and help ensure that flood risk to people and property will be managed satisfactorily, while allowing necessary development to go ahead in situations where suitable sites at lower risk of flooding are not available.</p>
Emerging Draft LPR Policy: SP7 Design Principles		
Newbury Town Council (lpr2266)	We support this policy while noting that not all the stated bullet points will be relevant or carry the same weight in any one development.	Comments noted.

Emerging Draft LPR Policy: SP8 Landscape Character

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2265)	We support this policy but would like clarification as to what is meant by “perceptual components” of the character of the landscape. We would also like to see some reference to features that are widely regarded as eyesores in the landscape – even the urban scene – such as the former post office building (the BT Tower) at the junction of Bear Lane and A339. We would dearly like to see something in the Local Plan that provides strong encouragement for development that removes such eyesores.	<p>Comments noted.</p> <p>Add the following definition of ‘perceptual components of landscape character’ to the glossary: <u>‘Our own personal appreciation of landscape and how we relate to or make use of it as individuals and communities through sight, sound, smell and feel.’</u></p> <p>As part of the evaluation of individual landscape character areas, the West Berkshire Landscape Character Assessment (LCA) 2019 identifies key detractors and issues including past, current and likely future trends that bring about change in the landscape and sets out landscape guidance focused on development management considerations to enhance the landscape of the area.</p>

Emerging Draft LPR Policy: SP9 Historic Environment

	<p>We support this policy but wish to add another category to the list of what constitutes “heritage”: “ancient ways”.</p> <p>Reason: our precious rights of way network is not just an important transport and green infrastructure feature but also very largely an important vestige of the history of the area. Many footpaths, tracks, ‘green lanes’ and drove roads enhance our landscape and need to be preserved for the education as well as enjoyment and practical use by future generations. Too often their heritage value is destroyed with careless urbanising treatment by developers, if they are not altogether obstructed, neglected, or demolished entirely.</p> <p>Wherever possible all such historic routes should be preserved in the state they are found at the time a site is brought forward for development, or at least as much of them as possible incorporated in the public rights of way network through Definitive Map Modification Orders (DMMOs) to ensure they remain open for use, protected and well managed. This is as important within settlements as in the open countryside.</p> <p>Proposed changes: add in “f)” after “areas” the words “historic routes”.</p>	<p>Comments noted</p> <p>The NPPF defines a heritage asset as ‘a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.’ This policy uses the same definition for consistency.</p> <p>Historic public rights of way would be considered under criterion g) of the policy.</p> <p>Amend criterion g) of the policy as follows – ‘.... or through the development management or other planning processes.’</p> <p>In the supporting text add a bullet point to the end of paragraph 5.46 of the Emerging Draft LPR as follows –</p> <ul style="list-style-type: none"> • ‘Historic Public Rights of Way’
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Emerging Draft LPR Policy: SP10 Green Infrastructure

Respondent	Response	Council Response
Newbury Town Council (lpr2263)	<p>We strongly support this policy. However, we wish to have more support for allotments here.</p> <p>Reason: Developments in urban areas such as Newbury's settlement area need to make specific provision for allotments at the earliest stage, in consultation with local councils which have statutory responsibility for providing them but have great difficulty finding land for them.</p> <p>In Newbury, there is currently a large waiting list for plots, and we believe the demand for allotments can only continue to grow as housing densities have increased in recent decades while we now see support for reducing "food miles" and the health and biodiversity value of allotments over that of some other forms of green infrastructure.</p> <p>Housing developments of more than 100 dwellings with densities greater than 30 should be required to make specific on-site provision for allotments according to the needs of surveys of demand carried out in partnership with surrounding parishes, or to contribute a financial contribution towards off-site provision. All other housing developments should contribute through the parish component of CIL.</p> <p>Allotment should not be taken as public open space. Rather they should be seen as an addition to public open space (see in the DC 37).</p> <p>Change proposed: In the supporting text, we wish to see a paragraph that reflects the above</p>	<p>Comments noted</p> <p>Allotments would be recognised by this policy and are included in the examples of GI assets in the supporting text.</p> <p>The provision of the most appropriate GI will vary in type and scale from site to site. The Council wishes to retain the flexibility to agree the best solutions with the developers rather than set out a detailed set of specification for all possible types of GI.</p>
Emerging Draft LPR Policy: SP11 Biodiversity and Geodiversity		
	<p>We support this policy but again feel that it ought to mention the biodiversity value of allotments.</p>	<p>Noted, it is acknowledged that allotments can make a positive contribution to biodiversity.</p> <p>The following text will be added to the supporting text to recognise the variety of spaces which can contribute to biodiversity value:</p> <p>'The 2019 'State of Nature Report' indicates that biodiversity across the UK is continuing to decline and as such change is required in relation to how we manage land. The Report highlights that urbanisation can fragment landscapes by creating barriers between habitats, thus isolating some populations but also recognises the wide variety of green spaces which exist within urban environments including domestic gardens, parks, allotments, cemeteries, ponds, and road verges which can all add to biodiversity value.'</p>

Emerging Draft LPR Policy: SP12 Approach to Housing Delivery

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2261)	<p>We neither support nor object to this policy because we are not able to comment adequately on the method of arriving at the target number of dwellings. We note (6.6) that this is liable to change in any case and accept that there has to be a number here.</p> <p>Some doubts about the current methodology are raised by the inclusion in the Local Plan of some sites that are already largely built out (parts of RSA 6), others that have been recently refused for numbers of dwellings smaller than stated in the Plan (RSA 5), yet more that have had planning consent for some time (remainder of RSA 6, RSA 2). On the other hand, there are sites not specifically mentioned in the Plan at all that have had planning consent including substantial amounts of housing for some years, seemingly because they are within a DEA (Faraday Plaza in LRIE). Nowhere is this explained.</p> <p>We wish to improve the aim of the policy in terms of climate change to allow loss of existing homes if it can be shown they are not habitable and that they can be replaced in situ with a net long-term gain in terms of tackling climate change and no net loss of habitable dwellings.</p> <p>Reason: to assist with the aim of achieving carbon neutral by 2030 and also to upgrade properties that have unavoidably high carbon fuel usage, in accordance with the council's Housing Strategy.</p> <p>Change proposed: add to last sentence ".... including replacement of dwellings that are unavoidably expensive to heat by carbon fuels, where the net long-term cost (including cost in use) can be shown to be significantly reduced by re-build and there is no net loss in terms of numbers of dwellings on the development site."</p>	<p>The government's standard methodology is used to determine the Local Housing Need (LHN), which forms the starting point for the housing requirement. At the time of the consultation on the emerging draft Local Plan Review (LPR) Regulation 18 consultation the government was consulting on changes to the formula, which would have led to a higher number for West Berkshire. The government's response to their consultation has, however, resulted in no change to the standard methodology for West Berkshire.</p> <p>There are several sources that will ensure a continuous supply of land for housing across the plan period. These include:</p> <ul style="list-style-type: none"> • Retained Local Plan (ie. Core Strategy and Housing Site Allocation Development Plan Document) and Stratfield Mortimer Neighbourhood Development Plan (NDP) allocations; • Allocations in the Local Plan which are not being retained due to development being at an advanced stage of construction; • Existing planning commitments on unallocated sites • Existing planning commitments for communal accommodation (C2 use class); • Small site windfall allowance; • New sites allocated in the LPR; and • Sites to be allocated in neighbourhood plans. <p>The contribution these sources of supply make to meeting the housing requirement are set in Table 2 of policy SP12. Several of the retained Local Plan allocations have been removed since the Regulation 18 consultation due to development being close to completion.</p> <p>The policy as it currently reads does not prevent redevelopment of dwellings and the policy for building sustainable homes and businesses (DM4) would apply to any redevelopment proposal as development plan policies need to be read together. No change is therefore proposed.</p>

Emerging Draft LPR Policy: SP13 Sites allocated for residential and mixed-use development in Newbury and Thatcham

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2260)	<p><i>See attachment on objective for full response to the LPR.</i></p> <p>We do not support this policy. We comment separately on SP 16 & 17.</p> <p>Reasons: As stated above in SP 12, there appear to be inconsistencies in the selection of sites to include in the Plan. For the Newbury settlement area and a bit beyond, we list all sites in the draft Plan, the HELAA, the 2013 SHLAA and the HSA DPD in a separate document to be read with this response (<i>attached</i>).</p> <p>Changes sought:</p> <ul style="list-style-type: none"> • Delete these sites and include them instead in “sites with planning consent and/or under construction” in the explanation of total housing numbers required in SP 12 supporting text: RSA2, RSA3, RSA4, • Delete RSA5 altogether as • Add the following HELAA sites with appropriate RSA numbering, maps, and descriptive text: <ol style="list-style-type: none"> 1. NEW02 land south of Phoenix Centre, Newtown Road – 24 dwellings 2. NEW07 former Magistrates Court, Mill Lane – 13 dwellings • Include NEW01 HELAA site housing numbers taken from promoter’s Council approved Master Plan – minimum 258 We would like to see a higher figure of around 550, taking account of the consented development Faraday Plaza and without removing the DEA status of the site in this Plan but accepting that is can deliver both a major increase in employment and significant new housing. <p>These changes taken together would go a considerable way towards meeting the overall housing need in the District. None of them should be considered ‘windfall’ sites because all have been promoted for housing and are shown in the HELAA as deliverable in this Plan period.</p> <p>(</p>	<p>The existing housing allocations in the Housing Site Allocations Development Plan Document (HSA DPD) have been rolled forward, but where the site is completed or where construction is underway, they will be excluded from the LPR (eg RSA6 will be amended to exclude that part that is now complete). All sites will also be reviewed to take account of any representations and/or additional information.</p> <p>Sites that have an extant planning permission are included in the supply. This includes both allocated and non-allocated sites.</p> <p>Allocation RSA5 (Land adjoining New Road, Newbury) is no longer proposed for allocation. This is due to the adverse impact on the surrounding Ancient Woodland. Standing advice in relation to ancient woodland has changed recently. There is significant pressure from all sides on the adjacent wood which would be close to residential areas within the site. The buffer zone required would be greater than 15 metres. The loss of green infrastructure cannot be enhanced. Following the National Planning Policy Framework (NPPF) which states at paragraph 180 c) that ‘development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists’, and further to the refused planning application for four dwellings, it is considered that the impact on the ancient woodland would be so great that the site is not suitable for development.</p> <p>Sites NEW1, NEW02, and NEW07 are not proposed for allocation as they are all located within the settlement boundary. 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. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable.</p> <p>The West Berkshire Local Plan does not include allocations within settlement boundaries because the principle of development is considered acceptable.</p> <p>For the reasons above it is not proposed to amend the LPR to include sites NEW1, NEW2, and NEW7 as allocations. Therefore no further changes to Policy SP13 are proposed.</p>

Emerging Draft LPR Policy: SP16 Sandleford strategic site allocation

Respondent (with lpr ref)		Council Response
Newbury Town Council (lpr2259)	<p>We continue to strongly oppose this policy.</p> <p>Warren Road can never be suitable as an “all vehicle” access for the whole site of upwards of 1500 dwellings and supporting local centre. If Sandleford is ever to be built, it does need all-vehicle access roads on each of three sides: north towards Newbury town centre; east directly onto A339 for southbound traffic; and onto A343 for traffic bound for A34 in both directions. An access road in the middle of Wash Common next to two schools and two churches must be only for emergency vehicles, buses, pedestrians, and If there is ever a “Sandleford South”, then extend site south to enable perhaps a fourth all-vehicle access to the whole site could be onto</p> <p>Andover Road south of the settlement area at Wash Water. However, this is deemed undeliverable within the Plan period. Therefore, Sandleford as described in the SPD should not be considered until an acceptable fourth access route is deliverable.</p> <p>A ‘local centre’ should be a business and social ‘hub’ not primarily retail or employment. Changing travel and working patterns indicate that families will spend much more time in their local communities and less time “at work”. Therefore, large developments such as this need to make provision for larger social and all-purpose community support facilities within the site, in partnership with the local council[s]. These must be delivered much earlier in the build-out than has been the case with recent large developments such as Newbury Racecourse and North</p> <p>The Climate Emergency, the Council’s Environment Strategy and other precedents (e.g. Wiltshire’s recently adopted Local Plan) lead us to believe that a much greater buffer is required around ancient woodland within this site. Unless this is provided, we believe the development will be contrary to the aims of the Biodiversity policy SP11.</p> <p>Changes:</p> <p>We do not believe this policy should remain in the Local Plan without a complete review because it has been shown to be undeliverable even before the Climate Emergency was announced and is certainly not deliverable now unless the SPD is revised to reflect the emerging Local Plan policies.</p>	<p>Comments noted.</p> <p>Local Plan Review (LPR) Transport Assessment Report Phase 1 (2019) has informed the preparation of the Local Plan Review and has included known highway improvements that have a reasonable expectation of being delivered which includes; New access from the A339 to the Sandleford development and dualling of the A339 between the new Sandleford access and the Pinchington Lane roundabout. Further modelling work will continue to be undertaken as part of the LPR TA up to the Regulation 19 submission. This will include work on identifying and scoping the necessary mitigation that will be required to address areas of concern highlighted by the transport modelling outputs shown in this Phase 1 Transport Assessment.</p> <p>The term ‘Local Centres’ generally refers to a range of small shops of a local nature, serving a small catchment. Typically, local centres might include, amongst other shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Policy DM39 introduces a presumption in favour of the provision of new or enhanced community facilities. In addition to this the Sandleford Park SPD sets out that the principal community facilities to be provided are: Primary educational facilities for the new population; an extension to Park House School sufficient for the new population; Early Years and Children’s Centre provision for the new population; a space for indoor community use that may include a place of worship; library provision; and small scale retail facilities to provide at least one local shop/convenience store.</p> <p>The supporting text to Proposed Submission LPR Policy DM15 Trees Woodland and hedgerows has been amended to include:</p> <p>‘Development near ancient woodland will be treated in accordance with the most up to date joint Natural England and Forestry Commission Standing Advice. This currently advises that development proposals should have a buffer zone of at least 15 metres from the boundary of the woodland to avoid root damage. For ancient and veteran trees the buffer zone should be at least 15 times larger than the diameter of the tree. The buffer zone should be 5 metres from the edge of the tree’s canopy if that area is larger than 15 times the tree’s diameter. Precise buffers would need to be determined through detailed assessment and design when proposals are submitted for development. The Council will adopt a precautionary approach as to what would be considered appropriate in order to ensure that any buffer fulfils the specific requirements of its location and the type of development proposed.’</p>

(Proposed Submission LPR Policy: SP17 North East Thatcham strategic site allocation)

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2258)	We will not comment on this in any detail but have grave reservations about the need for such a large housing development in a part of the District that is poorly connected to the wider transport network. We fear it will impact upon traffic congestion throughout the Newbury & Thatcham Plan Area and beyond and we have not seen anything in the supporting evidence to alleviate those fears. We reserve judgement until the Regulation 19 consultation stage.	Comments noted, the Phase 1 Transport Assessment (TA) report identified that there were not large swathes of the highway network identified as being potentially problematic by the end of the plan period. Having said that, the TA report also acknowledges that there would be delays at junctions and the highway network on the A4 corridor and adjoining links as a result of the THA20 development, including some displacement of A4 traffic onto wider rural routes such as Upper Bucklebury. For instance, without mitigation the transport models used do show significant impacts along the A4 and Floral Way resulting in potential delays per vehicle of an extra 32 – 62% when compared to the 2036 Core Forecast (without development). However, a development of this nature would not be expected to go ahead without mitigation measures and improvements being made to local transport networks as addressed in the IDP and informed by updated transport modelling. The package should better accommodate the expected increase in traffic as a result of the development. The modelling outputs focus on the impacts for both morning and evening peaks. It should be noted that it is not just changes to the highway network that will form mitigation packages. Other measures to reduce vehicles journeys from the development in favour of more sustainable travel and lifestyle choices will be important elements of the overall transport plan.

(Proposed Submission LPR Policy: SP18 Housing Type and Mix)

Newbury Town Council (lpr2257)	<p>We broadly support this policy.</p> <p>Reason: We wish to strengthen support for community needs housing: selfbuild, co-housing, etc. The housing market lacks innovation and fails to meet a wide range of needs.</p> <p>We believe that housing designed mainly by and built for those who intend to live in it themselves is generally of a better quality than what the major volume home builders produce, because their main duty is maximising shareholder profit, and they have to an unhealthy extent dominated the land market.</p>	<p>Comments noted.</p> <p>The Council's starting position should be to look favourably upon schemes initiated by the local community.</p> <p>Amend final paragraph of Policy as follows:</p> <p>‘In order to support local communities to meet their housing needs the Council may will normally support the development...’</p>
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(Proposed Submission LPR Policy: SP19 Affordable Housing)

Newbury Town Council (lpr2256)	<p>We strongly support this policy.</p> <p>Reason: The reference to the need for all affordable housing to be “built to net zero carbon standards” is welcomed. For those who cannot afford market rents or mortgages, the cost of heating and powering their homes is especially important. Provided similar policies are adopted nationally by LPAs, economies of scale for developers should ensure that the cost of making homes both affordable and sustainable in climate terms should not be excessive.</p>	Comments noted
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(Proposed Submission LPR Policy: SP20 Strategic approach to employment land)

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2255)	<p>Policy not supported.</p> <p>There is no reference to the impact of Covid-19. All evidence pre-dates the pandemic. Whilst the implications for strategic spatial planning are not yet clear, evidence is mounting that casts doubt on the need for new office floor space and indicates that much employment will be largely home-based. In particular, the concept of the “15-minute neighbourhood” is gaining support within the planning profession.</p> <p>Changes to be made/preferred approach: To be discussed. None at this time.</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p>

(Proposed Submission LPR Policy: SP20 Strategic approach to employment land)

Newbury Town Council (lpr2255)	<p>Policy not supported.</p> <p>There is no reference to the impact of Covid-19. All evidence pre-dates the pandemic. Whilst the implications for strategic spatial planning are not yet clear, evidence is mounting that casts doubt on the need for new office floor space and indicates that much employment will be largely home-based. In particular, the concept of the “15-minute neighbourhood” is gaining support within the planning profession.</p> <p>Changes to be made/preferred approach: To be discussed. None at this time.</p>	<p>Comments noted. No changes to the policy are required in light of this representation.</p> <p>Given the preparation of the ELR 2020 was undertaken prior to the COVID 19 pandemic, the Council has taken the opportunity to update this work using the most recent economic forecasts which take account of the major macro-economic changes which have taken place, including COVID and Brexit. The update to the ELR will inform the LPR and will be published alongside the Regulation 19 consultation.</p>
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(Proposed Submission LPR Policy: SP21 Employment site allocations)

Newbury Town Council (lpr2254)	<p>We wish to add Newbury Showground adjacent to J13 as an additional storage and distribution area.</p> <p>Reason: This would reduce the number of HGVs travelling into and through Newbury along the A4 from west and north in particular and enable other employment sites within Newbury to be redeveloped for commercial and industrial purposes. Junction 13 is the obvious hub for distribution networks and the Showground seems likely to undergo viability issues, as well as causing severe traffic congestion on local roads at certain times. Some light industrial and other commercial uses could also be relocated to the Showground from LRIE (possibly temporarily) while that site is redeveloped.</p>	<p>Comments noted.</p> <p>The land at Newbury Showground is to be assessed through the Housing and Employment Land Availability Assessment (HELAA). Even if found suitable, this would not replace existing employment areas (i.e. Colthrop and LRIE), and planning policy would not be able to force the relocation of uses from one site to another. There is no proposal by Colthrop Industrial Estate to redevelop the area for a mixed use development, and therefore the availability and deliverability are unknown. The A4 is part of the District's freight route and HGVs are directed to use this road.</p>
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(Proposed Submission LPR Policy: SP23 Transport)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2253)	We support this policy.	Comment noted

(Proposed Submission LPR Policy: SP24 Infrastructure requirements and delivery)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2252)	We cannot be expected to comment on this policy until the Infrastructure Delivery Plan is published.	<p>Comment noted.</p> <p>The Draft IDP was published on the Council's website in October 2021.</p> <p>This document includes a schedule of infrastructure requirements. The Draft IDP is currently being updating and will be published alongside the Regulation 19 Local Plan Review.</p> <p>At the time of writing no further representations were made by Newbury Town Council on the Draft IDP (October 2021). As a result, no further amendments need to be made in light of this representation.</p>

(Proposed Submission LPR ref: Chapter 8 Non-strategic site allocations)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2251)	We only comment in detail on those that are within or adjacent to Newbury Settlement Area. However, in general we believe that a few more small sites need to be identified outside of major urban areas in Rural Service Centres and Service Villages, for reasons given above (SP nn). We would prefer these to come forward through community led neighbourhood planning.	Comments noted. The Council's strategy is for a mix of sites: strategic sites such as Sandleford Park and North East Thatcham, which can delivering infrastructure, facilities and significant numbers of affordable homes and a larger number of medium and smaller sites, including brownfield sites within settlement boundaries. The strategy seeks to focus development in the more sustainable settlements of the District rather than distribute development more evenly. This approach continues that set out in the Core Strategy which went through all stages of consultation, examination and adoption by the Council.

Emerging Draft LPR Policy: RSA1 The Kennet Centre, Newbury

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2250)	We strongly support this site but have some reservations about the heights of some buildings proposed in the draft Master Plan. We note that currently there is no housing within the site, which is 100% town centre uses. We support the proposed mix of uses, the use of ground source heat pumps and the degree of vitality that should come with a large residential component.	Support for allocation noted. The site will now be removed from the LPR due to flood risk. As the site lies within the settlement boundary there is already a presumption in favour of development as set out in Policy SP1. Further details of this are set out above in the Council's response to representation lpr765.

(Proposed Submission LPR Policy: RSA1 Land north of Newbury College, Monks Lane, Newbury)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2247)	These sites (RSA2, 4 and 6) all have planning consent and much of RSA6 is already built and occupied. We do support their allocation in the Plan. In policy terms, the consented planning applications seem to make their inclusion superfluous.	Comments noted. Development has not yet commenced on the site. The allocation will therefore continue to be included in the LPR.

(Proposed Submission LPR Policy: RSA3 Land at Coley Farm, Stoney Lane, Newbury)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Statutory consultees		
Newbury Town Council (lpr2248)	These sites (RSA2, 4 and 6) all have planning consent and much of RSA6 is already built and occupied. We do support their allocation in the Plan. In policy terms, the consented planning applications seem to make their inclusion superfluous.	Comments noted. No changes to the policy are required in light of this representation.

(Proposed Submission LPR Policy: RSA4 Land off Greenham Road, Newbury)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2249)	These sites (RSA2, 4 and 6) all have planning consent and much of RSA6 is already built and occupied. We do support their allocation in the Plan. In policy terms, the consented planning applications seem to make their inclusion superfluous.	Comments noted. Several sources will ensure a continuous supply of housing across the plan period. These include retained allocations in the Local Plan. The site is currently allocated in the Housing Site Allocations DPD which forms part of the existing Local Plan. It is acknowledged that two of the parcels of land which make up the site have now been built out and so these will be removed from the LPR. The allocation is however being retained across the remaining part of the site that has not yet been built out. The policy will be amended accordingly.

(Proposed Submission LPR Policy: DM1 Residential Development in the Countryside)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2246)	Make explicit reference to zero carbon homes. Reason: To allow for innovative solutions in response to climate change. Change Proposed: In 9.7 of the supporting text and especially in relation to 'c', 'd' and 'j' of the listed 'criteria' in the policy, add the following sentence: "Developments that achieve or closely approach zero carbon or better in terms of their overall impact in any location within the countryside are likely to be looked on favourably, if they also fit one or more of the above criteria." Cross-ref. to DC23 & DC33.	Comments noted. This policy needs to be read in conjunction with other relevant policies in the LPR including Emerging Draft LPR Policies SP5, SP7, SP8 and DC3 Building Sustainable Homes. The policies make clear that all development, regardless of its location, should contribute to West Berkshire becoming and staying carbon neutral by 2030. Even if a development is carbon neutral or better it should still confirm with other relevant policies in the Plan.

(Proposed Submission LPR Policy: DM3 Health & Wellbeing)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2245)	We support this policy. This is a vital aspect of “place making”. However, it needs to take account of the whole life of the development, its surroundings, and future occupants - not just initial build quality and residents.	Comments noted. The supporting text makes clear that Health Impact Assessments will consider the likelihood, significance and duration of both the potential positive and negative impacts of proposals and will identify what will be monitored, how and by whom. They will also take into account the cumulative impacts of development.

(Proposed Submission LPR Policy: DM4 Building Sustainable Homes and Businesses)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2244)	We support the approach to homes having a nationally recognised and measurable standard of quality. However, we do not support the treatment of Renewable Energy as merely a class of Business: category “3”. Reason: Renewable Energy should be a separate DC policy on its own to highlight its importance. There are ‘developments’ which are purely for renewable energy, e.g. solar arrays, micro-hydro and wind turbines. Under ‘3’ currently there is ‘A’ which deals with renewable energy as part of a residential or commercial development. ‘B’ is for renewable energy developments that are ‘stand-alone’. These should be in the Local Plan but as a separate category with its own policy, in particular to cover schemes in ‘countryside’. This should be referenced in the proposed amendment to SP5 (see above) and only the sub- category “A” should be part of this policy.	The comments are noted. The Proposed Submission LPR policy is generally supportive of renewable energy schemes subject to and according to their proposed location.

(Proposed Submission LPR Policy: DM15 Trees, woodlands and hedgerows)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2243)	<p>Include provision in this policy for large tree planting schemes in or near settlements to have prior planning permission.</p> <p>Reason: Large areas of new tree planting near to residential areas should require planning permission. They can cause harm to the amenity of nearby homes.</p> <p>Change proposed: Add to end of policy, in separate paragraph:</p> <p>“Whilst the Council supports the planting of trees in the countryside, which is normally not a matter for the LPA, large areas of tree planting can over time cause harm to the amenity of nearby residential properties. Therefore, schemes for more than [n] trees capable of reaching a height in excess of [m] metres may require planning consent if within a settlement area or if the nearest settlement boundary is within [x] metres of any part of the proposed planted area.</p>	<p>Comments noted.</p> <p>The suggested paragraph falls outside the scope of the Local Plan Review.</p>

(Proposed Submission LPR Policy: DM16 First Homes exception sites)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2242)	<p>We support this policy.</p> <p>Although the policy is unlikely to be needed in Newbury or Greenham since all land suitable for development is either already allocated for housing or needed for public open space, or protected in some other way from development, it is needed adjacent to many other settlements.</p>	Comments noted

(Proposed Submission LPR Policy: DM17 Rural Exception Housing)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2241)	This policy is not applicable to the Newbury settlement area or the rest of Newbury & Greenham.	Comment noted

(Proposed Submission LPR Policy: DM18 Self and custom build housing)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2240)	<p>We strongly support this policy.</p> <p>Reason: see SP 18. Quality of housing is generally higher when designed and built for an end user. We would like to see more publicity given to the policy, because surveys by the national association for self- and custom-built housing show that few people know about these as a separate category and it should be actively promoted.</p>	Comments noted

(Proposed Submission LPR Policy: DM19 Specialised Housing)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2239)	We support this policy.	Support noted

(Proposed Submission LPR Policy: DM20 DC19 Gypsies, Traveller and Travelling Showpeople)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2238)	<p>We support this policy apart from the inclusion of the need to be on previously developed land which we feel is not at all necessary. Whilst desirable, the words “previously developed” [land] should be prefaced by “high quality agricultural or public open space (or access) – or (preferably) -”.</p>	<p>The Planning Policy for Traveller Sites and the NPPF support the use of brownfield/previously developed land for development, including that for gypsy and traveller pitches. It is considered appropriate to seek to direct gypsy and traveller pitches to previously developed land where possible.</p>

(Proposed Submission LPR Policy: DM21 Retention of mobile home parks)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2237)	We support this policy.	Comment noted

(Proposed Submission LPR Policy: DM22 Residential use of space above non-residential units)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2236)	We support this policy. However more consideration needs to be given to the need for storage of cycles and bins, possibly on a communal basis.	Comments noted. Policies DM42 and DM44 (and the supporting text of policy DM31) set out the expectations for cycle parking and storage as part of residential development. Elsewhere in the plan (at Policy SP7) the requirements for the provision of waste storage are already set out and there is no need to repeat them in this policy.

(Proposed Submission LPR Policy: DM24 Conversion of existing redundant and disused buildings in the countryside to residential use)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2234)	<p>We do not support this policy as it stands.</p> <p>There should be more flexibility to re-use buildings that are not structurally sound in their entirety. To We wish to preserve - or restore and re-use - structures in the countryside that reflect the local character and to remove eyesores.</p> <p>Change Proposed: Delete '(i)' and renumber. Add in Supporting text: Conversion of a building that is partially but not wholly structurally sound to a residential use will not normally be allowed unless the building is itself of heritage value, its retention for another use cannot be justified and re-use will enhance its heritage value or that of its setting."</p> <p>Para 11.49 in the existing Supporting Text is very hard to understand as written. In any case, it might be itself redundant if the above amendment is accepted.</p>	<p>Comments noted.</p> <p>The purpose of criterion a) (was i) in the Emerging Draft LPR) is to ensure the policy is applicable to buildings capable of conversion, rather than needing significant building works to enable the habitation of the building. This follows the NPPF (paragraph 80) which permits the re-use of redundant or disused buildings. The redevelopment of buildings/sites is covered under Policy DM35 where proposals support the rural economy.</p> <p>The supporting text (first paragraph) provides further detail to the purpose of the policy, and is explicit in its intention not to apply to buildings that have an adverse visual/landscape impact, such as large agricultural sheds.</p>

(Proposed Submission LPR Policy: DM25 Replacement of existing dwellings in the countryside)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2233)	This policy is not applicable to Newbury or most of Greenham, but we support it.	Comments noted

(Proposed Submission LPR Policy: DM28 Residential Extensions)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2230)	We support this policy	Comments noted

(Proposed Submission LPR Policy: DM29 Residential Annexes)

(Proposed Submission LPR Policy: DM30 Residential Space Standards)

(Proposed Submission LPR Policy: DM31 Residential amenity)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2229)	We support this policy	Comments noted

(Proposed Submission LPR Policy: DM35 Sustaining a prosperous rural economy)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2225)	<p>We support the policy. However, there is lack of clarity about the definition or “rural” in this context. Market towns like Newbury, Thatcham and Hungerford are integral to the “rural economy” but the policy appears to be intended to relate purely to businesses located in what in planning terms is “open countryside” and not in “settlements” at or near the top of the hierarchy used in this Plan.</p> <p>Reason: this policy should not exclude development in larger settlements across the District which genuinely support “rural business” (e.g. breweries) but should make it clearer under what circumstances a development proposal that doesn’t need to be located in the countryside might be permitted.</p>	<p>Comments noted.</p> <p>The policy is specifically for economic development in the countryside, for locations outside of settlement boundaries.</p> <p>The policy does not exclude development in larger settlements, but as development in rural areas is generally more restrictive, the policy is aimed at providing opportunities for particular development, and in particular circumstances in rural areas. The principle of developing in the settlement boundaries of market towns (Newbury, Thatcham, Hungerford) is generally supported, and therefore does not require a specific policy. As part of the submission version of the Plan there will be a specific policy for local community facilities.</p>

(Proposed Submission LPR Policy: DM32 Designated Employment Areas)

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2226)	<p>We broadly support this policy, but it is unclear what is meant by “small scale commercial and services uses” or why they might not be permitted in DEAs.</p> <p>Reason: Every kind of “commercial and services” land use would seem to involve “employment”. So, it is unclear why there is a need for any policy to control it. It might even be encouraged, because if (for example) it means personal services like hairdresser or food takeaway food, then locating such businesses within a DEA surely should reduce the need of customers working in that DEA to travel to/from the DEA to secure those services.</p> <p>An entire rethink of “business uses” within the Local Plan appears to be needed. So much “business” now takes place within the home. It makes the separation of “residential” and “non- residential” property for all purposes (including local taxation) seem outdated. However, this is a matter beyond planning policy although linked to it.</p> <p>There should perhaps be some reference to “live-work” units here – or in a separate policy.</p> <p>Changes to be made/preferred approach: None proposed at this stage. Examples are needed to show why this aspect of the policy is required,</p>	<p>Comments noted. The policy will be amended to provide clarity regarding development within DEAs.</p> <p>This policy relates to DEAs, their role and function as well as the uses permitted within these areas. They are locations across the District designated for business development, and for the purposes of the LPR business development relates to offices, industry, storage and distribution uses. Other employment generating uses, such as hairdressers, supermarkets etc. fall under the term economic development which is wider than the term business development within this plan.</p> <p>The Planning Practice Guidance (PPG) requires strategic policy-making authorities to gather evidence on existing business needs and plan for future business uses.</p>

(Proposed Submission LPR Policy: DM37 Equestrian and Horseracing Industry)

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2223)	<p>We support this policy, apart from concern about the possible impact of Racecourse events (noise) on neighbouring residential land. not in policy</p> <p>Reason: There has been a significant increase in evening events at Newbury Racecourse that are not related to racing, at the same time as a very large increase in numbers of homes on adjacent land within the Racecourse's ownership. This could harm the amenity of residents who may have been unaware of the frequency and type non-racing activities there. We are also concerned about the more general disregard for the interests of their leaseholders and occupiers exhibited by the Racecourse and by the 'gagging clause' in their lease to property owners which seems to disenfranchise them with respect to this. Whilst this may not be entirely a planning matter, we believe it has an impact on how future proposals for development by the Racecourse should be regarded.</p> <p>Change Proposed: Add to end of Supporting Text for Newbury Racecourse:</p> <p>"Development proposals in support of events not related to the racing industry and likely to occur mainly in evenings or at weekends must demonstrate community support and sensitivity to noise and traffic impacts on the neighbourhood and highway network."</p>	<p>Comments noted</p> <p>Add the following text to end of the Emerging Draft LPR unnumbered para(after 12.43) relating to Newbury Racecourse - <u>The consideration of neighbour amenity will be an important issue when considering development proposals in support of events not related to the horseracing industry.</u></p>

(Proposed Submission LPR Policy: DM42 Transport Infrastructure)

Respondent (with lpr ref)	Response	Council Response
Newbury Town Council (lpr2222)	<p>2. Minor change regarding re-use of former railway lines 3. Aim to reduce need to travel by car</p> <p>Reason: The Hermitage to Hamstead Norreys cycle path has recently been completed. The current focus is the link between Hermitage and Newbury, which will require considerably most funding but also potentially have much greater</p> <p>The ideal transport policy would not rely on private car ownership at all. The concept of a “15-minute neighbourhood” applied to a sustainable modern settlement in a Climate Emergency would require all daily needs to be met without a car.</p> <p>Change Proposed: In 12.48 of Supporting Text, in last sentence replace “re-use the alignment” with “replace that part”; also delete all after “railway line to provide” and replace with: “... between Hermitage and Newbury, a route for both leisure and potentially commuter use, incorporating existing minor roads and bridle ways as ”</p> <p>Somewhere in Supporting Text – preferably at the end of first para (12.44) or immediately after it, there needs to be a statement such as: “At all stages in planning for a major development, proposals should consider ways of reducing the need to travel, especially during the working day. Where possible, all facilities needed on a daily basis should be located within a 15-minute journey time of a new place of employment or residence by means other than the private car. If necessary, facilities should be provided on site.”</p>	<p>Comments noted.</p> <p>A link from Newbury to connect with the Hermitage to Hampstead Norreys former railway cycle path is recognised both as an important leisure and potential commuter cycling route, including being shown in the Council’s Local Walking & Cycling Infrastructure. WBC would be supportive of initiatives to develop and deliver a link from Newbury to the new active travel path.</p> <p>Add the following text to the end of the first paragraph of the supporting text as follows - <u>‘...At all stages, proposals should consider the need of reducing the need to travel, especially during the working day. Where possible, services and facilities should be located within an acceptable walking and cycling distances of new places of employment or residences.’</u></p>

(Proposed Submission LPR Policies: DM44 Parking and DM45 Travel Planning)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2221)	<p>Travel Plans should be in a separate</p> <p>3. Add reference to on-road parking outside Residents Parking Zones</p> <p>Reason:</p> <ul style="list-style-type: none"> There is much more to travel planning than relates to It needs a separate policy because of its importance to spatial planning of new developments. With new on-road cycle lanes being introduced with the LCWIPs, we need to protect roadsides that are designated for cyclists as no-parking for all <p>Changes:</p> <p>Completely re-word to emphasise that travel needs to be a core consideration in any major development, whether there is land for parking or not. It is the need for vehicular travel that Climate Emergency requires consideration of. This would then obviate the need for the first sentence in this part of Policy DC36.</p> <p>Add new paragraph immediately above current "Travel Plans": "Where any proposed development abuts a designated primary cycle route on a road that has insufficient width to provide that route segregated from vehicular traffic or pedestrians, the development must not result in additional on-road parking and should where possible enable any existing on-road parking to be accommodated within the This applies outside Residents Parking Zones and even beyond settlement boundaries – but not where speed limits are below 30mph."</p>	<p>Comments noted.</p> <p>A separate policy covering Travel Plans will be prepared for the Regulation 19 submission. The importance of the role for good travel planning to influence people's travel choices and behaviour is recognised.</p> <p>Route audits undertaken for the LCWIP included on-street car parking, which will be considered where new cycle schemes are developed. If a mandatory cycle lane is proposed (i.e. marked with a solid white line), then motorists should never enter or park in it. If cycle lanes are advisory (i.e. marked with a hatched line), motorists should not enter or park in them if it is unavoidable. These issues will be considered on a scheme-by-scheme basis. These points will be considered in the re-draft of a new separate Travel Plans policy.</p> <p>The presence of a designated cycle route (such as those outlined in the Council's LCWIP) would be considered in the development application process.</p>

(Proposed Submission LPR Policy: DM40 Public Open Space)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council (lpr2220)	<p>We support a generous provision of public open space in all housing developments.</p> <p>'Public' means public. Public space should not be exclusive to any specific development but rather should include the wider community.</p>	Comments noted

(Proposed Submission LPR Policy: DM41 Digital Infrastructure)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Newbury Town Council	<p>We support and encourage this policy.</p> <p>We would like to see broadband infrastructure funded by the CIL pot.</p>	<p>Support for policy noted.</p> <p>Emerging Draft LPR Policy SP23 (Infrastructure Requirements and Delivery) supports digital infrastructure.</p> <p>The Infrastructure Delivery Plan consultation in March 2021 did not put forward any comments/suggests in relation to digital infrastructure, or more importantly infrastructure projects from any of the digital infrastructure providers.</p> <p>Community Infrastructure Levy (CIL) cannot be handed over to an external provider (private company/organisation) but the Council can work with providers on projects – not studies or personnel or project management funding – but on actual infrastructure.</p>

(Proposed Submission LPR Policy: DM39 Local Community Facilities)

Respondent <i>(with lpr ref)</i>	Response	Council Response
Statutory consultees		
Newbury Town Council (lpr2218)	<p>Developers must provide a more generous and flexible allocation of land for community facilities and provide it earlier in the build – done in partnership with the local council(s).</p>	<p>Comments noted. Developer contributions are sought on most new development within the District. These contributions are sought in order to provide for additional facilities and infrastructure demands as a result of new development.</p> <p>Where a development is large enough to support additional facilities on site (for example, strategic in size), these will be provided.</p> <p>Policy SP23 of the Emerging Draft LPR sets out the planning policy approach for infrastructure requirements and delivery.</p>

Local Area Plan presentation

Newbury Town Council

7.00 pm, 19 Jan 2023.

Invitees: All members of Newbury Town Council and the Council's Neighbourhood Development Plan Steering Group

Present: Paul Millard, Ian Blake, Councillors Nigel Foot (Chairman), David Marsh, Gary Norman, Andy Moore, Jo Day, Vaughan Miller, Phil Barnett, Billy Drummond, Roger Hunneman and Hugh Peacocke (CEO)

WBC Officers: Eric Owens, Interim Executive Director – Place
Bryan Lyttle, Planning Policy Manager.

The Chairman welcomed all and invited WBC officers to tell the attendance about the "Regulation 19" consultation.

Eric Ownes said that on the 1st of December 2022 WBC resolved to complete the Regulation 19 documentation, publish for consultation, then submit to the Planning Inspectorate

The consultation runs from the 27th of January to the 3rd of March 2023.

The Regulation 19 consultation is for the Planning Inspectorate. Comments received would be reviewed, collated and submitted to the inspector by the 23rd of March.

Examination may happen in the summertime.

The regulation 19 consultation is a formal consultation for the Planning Inspectorate. It includes a tracked changes version of the regulation 18 document having regard to the comments received from that consultation.

Anyone who wishes to have their views heard by the Inspectorate must respond to the regulation 19 consultation.

The local area plan review replaces the core strategy the site allocations.

The attendants asked questions about housing need, housing targets and housing site allocations.

Bryan Lyttle responded that these had regard to the Area of Outstanding Natural Beauty, flooding, birth rates and population growth. The LAP review proposes a target 513 dwellings per annum (current target is 525 dwellings per annum)

Noted that there is an increasing housing waiting list and that young people are moving away from West Berkshire as housing is unaffordable.

The LAP has a housing mix policy.

It is not possible to say what impact of the new NPPF will have on the local area plan.

The deadline for completion of the local area plan is December 2023.

Windfall sites, affordable housing and the height of buildings in the town Centre were also discussed.

The conservation area appraisal will be a material consideration in the planning process. WBC will be asking the consultants who prepared the draft CAA to assist in assessing the responses. They may contact people or organisations who respond to the consultation. Following this the process is for WBC to adapt the CAA.

Bryan Lyttle reported that the regulation 18 consultation received thousands of responses.

The Chairman and those present thank Mr Owens and Mr Lyttle for their time and the assistance they had provided the Newbury Town Council and the Neighbourhood Development Plan Steering Group.