

## Compton Neighbourhood Development Plan (NDP) Consultation (Regulation 16)

Comments should be returned no later than 4:30pm on Friday 16 July 2021:

- **Preferably via our consultation portal at the Council's website:**  
<http://consult.westberks.gov.uk/kse>
- **By e-mail to:** [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk)
- **By post to:** Planning Policy, Development and Planning, West Berkshire Council, Council Offices, Market Street, Newbury, RG14 5LD

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This form has three parts: –

Part A – Personal details

Part B – Notification of progress of the Compton NDP

Part C – Your representations

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## Part A – Personal Details

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details of the agent in 2.*

Title	Mr
First Name	Mike
Last Name	Harris
Job Title (where relevant)	Senior Planning & Enabling Manager
Organisation (where relevant)	Homes England
Address Line 1	2 Rivergate
Line 2	Temple Quay
Line 3	Bristol
Line 4	
Post Code	BS1 6EH
Telephone Number	██████████
E-mail Address	████████████████████

### 2. Agent's Details (if applicable)


**Please note that representations cannot be kept confidential and will be published for public scrutiny, however your contact details will not be published. You can view the Council's privacy notices at: <https://info.westberks.gov.uk/privacynotices>.**

## Part B – Notification of progress of the Compton NDP

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

<i>Publication of the Examiners report / Decision to progress to referendum</i>	Yes
<i>Decision to adopt the Neighbourhood Plan</i>	Yes

## **Part C – Your comments on the Compton NDP**

**Please use a separate response sheet for each separate comment**

Under Regulation 15 of the Neighbourhood Planning (General) Regulations, Compton Parish Council submitted the Compton NDP to West Berkshire District Council on 6 May 2021.

In accordance with Regulation 16, West Berkshire District Council must now undertake a 6 week public consultation on the plan, during which interested parties can make comments. The consultation period will run from Friday 4 June 2021 to 4:30pm on Friday 16 July 2021.

Please read the submission Compton NDP and its supporting documents, and provide your comments to the proposals. Please use a separate response form for each comment.

The Council has a duty not to accept comments of a discriminatory nature.

**To which part of the document does this comment relate? Please specify the section or policy on which you are commenting.**

**Section** Various – see comments below

**Policy Ref** Various – see comments below

**Your comments:**

### **Overview**

Homes England is an executive non-departmental public body, sponsored by the Ministry of Housing, Communities & Local Government. We are the government's housing accelerator with responsibility for:

- increasing the number of new homes that are built in England, including affordable homes and homes for market, sale or rent
- improving existing affordable homes and bringing empty homes back into use as affordable housing
- increasing the supply of public land and speeding up the rate that it can be built on
- helping to stimulate local economic growth by using our land and investment, and attracting private sector investment in local areas.

In respect of the Compton Neighbourhood Development Plan (CNDP) our interest primarily relates to our ownership of the former Pirbright Institute site and our proposals for redevelopment to meet local housing needs. A Planning Application (ref. 20/01336) is being considered by West Berkshire Council and has recently been updated to reflect the responses to statutory consultation undertaken during the summer of 2020.

Homes England made representations at the Regulation 14 stage of the CNDP. Much of what was set out in those representations remains relevant and is not repeated here; a copy is attached and should be considered alongside this Regulation 16 response as our collective position.

In respect of Regulation 16, detailed comments on the submitted plan are set out below.

### **Policy**

*Policy C6* – Our Regulation 14 response remains valid.

Whilst we note the response of the Neighbourhood Plan authors in the Consultation Report, the retention of the hostel site should not be mandated within CNDP policy. It should also be noted that this step is beyond the scope of and conflicts with West Berkshire's Housing Site Allocations Policy HSA23 which only deals with the 'site' and its potential to come forward for development, not the buildings themselves. Policy HSA23 envisages that should this occur, the site must be integrated with the wider allocation, something which the above referenced planning application clearly does.

As noted at Regulation 14, there are significant challenges in reusing these buildings and integrating them with the wider redevelopment proposals. Furthermore, market testing with potential developers has indicated a preference for demolition rather than retention and, in addition, housing associations would typically prefer new build housing when transferring to their stock in order to ensure the quality and their ability to effectively ensure the long-term maintenance. Homes England are committed to the provision of a housing mix across the site which meets the needs of those seeking smaller 1 and 2 bedroom homes.

We support the broad principle in Policy HSA23 and suggest that CNDP Policy C6 is either deleted or amended to better align with HSA23.

*Policy C7* – there is no design detail available within the Plan to substantiate the need to utilise single storey dwellings in Area B in order “to assist with the transition of the development in an appropriate scale to the open countryside beyond.”

As such, it is inappropriate for the Policy, in the absence of detailed supporting evidence, to stipulate this. It should therefore be left to the Development Management process, considering Technical Assessments, to appraise whether proposed building heights are appropriate or not.

*Policy C9* – policy should be updated to reference Building for a Healthy Life as the update to Building for Life.

We note the comment in the Consultation Report in response to the same point which was made at Regulation 14 stage however the update is not simply a Homes England’s update to the document. Whilst we have partnered in producing the new document, it is important to note that this was produced alongside NHS England and NHS Improvement. The update is also referenced within the Government’s National Design Guide and therefore as new Policy, the CDNP should reflect the latest position.

*Policy C13* – The Consultation Report suggests that the submitted plan wording is amended from Regulation 14 stage and now includes “and delivered” in respect of community facilities. However, the version published by the Council does not include this wording; clarification is required. Notwithstanding, our Regulation 14 comments remain valid.

In seeking to require delivery of these facilities within the proposed wording, the Policy is undeliverable on the basis that Homes England has no remit to deliver nursery facilities. Whilst there are instances of where premises for such facilities are provided, it would be expected that there would be a viable commercial operator. As noted below in our comments on the Consultation Report, we have had no commercial approach from potential operators. On this basis, the wording would be inappropriate.

In addition to the above, the same issues exist as with the hostel site buildings, namely that the reuse of the former nursery building would be inappropriate in the context of the requirement for remediation and the comprehensive redevelopment of the site.

### **Basic Conditions**

The section in respect of Policy C2 fails to reference key and relevant sections of the National Planning Policy Framework (NPPF) which should be taken together as the policy framework. Specific references include:

- Paragraph 117 – the importance of making “as much use as possible of previously-developed or ‘brownfield’ land”;
- Paragraph 118c –notes that policy and decisions should “give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land”;
- Paragraph 118d – notes that policy and decisions should “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively”

### **Consultation Report**

Aside from detailed policy comments made above, the following are observations in respect of the Consultation Report.

Section 6 seeks to respond to comments made at Regulation 14 by Homes England and West Berkshire Council in relation to draft Policy C13, specifically the potential use of buildings on the former Pirbright Site for childcare and employment provision.

Paragraphs 6.2 and 6.3 refer to a technical note that has been prepared in response to comments. Notwithstanding the interest that existing childcare operators and potential businesses may have in seeking new premises, the commercial and practical realities of using existing buildings on the site have not been addressed and therefore the note is insufficient justification for the policy as drafted.

Whilst the desire to see existing buildings reused is noted, there needs to be a recognition that buildings on the site are not fit for modern use and that the costs of bringing them to an acceptable standard would be restrictive. In addition, the retention of some buildings and demolition of others would prejudice the ability to deliver both comprehensive remediation and a cohesive development scheme. Finally, there has been no credible commercial approach to Homes England to discuss the potential use of existing buildings and on that basis, given our remit to deliver housing, including much needed affordable housing, we have progressed the redevelopment proposals as per the submitted planning application.

#### **Examination involvement**

Given the important issues raised and our interest in the only allocated housing site in Compton, Homes England would wish to be involved in any relevant examination hearing that may be held. We continue to seek a positive dialogue with the CDNP group/Parish Council around the long-term redevelopment of the site and look forward to the next steps in the CDNP process.

**Your completed representations must be received by 4:30pm on Friday 16 July 2021.**

**Compton Neighbourhood Plan Regulation 14 Consultation**  
**Monday 9<sup>th</sup> November – Monday 21<sup>st</sup> December 2020**



**Pre-submission Consultation Comments Form**

The Regulation 14 consultation provides an opportunity for the NDP, and supporting documentation to be presented as a whole to the community, statutory consultees and other stakeholders for comment. All responses received will be reviewed by the NDP Steering Group and revisions may be made to the Draft Plan. A Consultation Statement which will include a summary of all comments received and how these were considered will be made available with the final ‘Submission Plan’, that will be submitted to West Berkshire Council for further consultation and independent examination.

Thank you for your help and support in preparing the Compton Neighbourhood Development Plan.

<b>Name/ organisation and postcode (for purposes of clarification and feedback only)</b>		
Name/organisation: Mike Harris MRTPI (Senior Planning & Enabling Manager) / Homes England		
Post Code: BS1 6EH		Date: 18/12/2020
<b><i>If you have comments please record them below:</i></b>		
Plan page number	Paragraph or Policy Number	Comment
5	39	<p>In relation to the redevelopment of the former Pirbright Institute site, Homes England agree with the principles of redevelopment protecting the AONB and the wider character and appearance of the village.</p> <p>Redevelopment for housing, as demonstrated within the technical evidence supporting our planning application, will provide a significant landscape improvement when considered against the existing built form.</p> <p>More widely, we are committed to delivering high design standards together with requiring our development partners to deliver against the Building for Healthy Life principles.</p>
6	39 bullet 5	<p>Whilst acknowledging the policy context at the time of allocating the site, particularly the consideration of deliverability and viability, it is welcomed that the draft NP recognises the importance of considering proposals in the latest context/against up-to-date evidence.</p> <p>It is clear that since the time of the allocation, matters of viability/deliverability have moved on, hence the level of development sought in the current planning application.</p>
7	3.10	Reference to viability/soundness of HSA DPD Policy HSA23 – please note comment above.

15	5.10	<p>Whilst recognising and supporting the principle of Neighbourhood Plans to provide a fine grain local input to policy, it is important to ensure that any potential changes which might have an impact on the overarching principles of the HSA DPD are considered strategically. This is particularly relevant in respect of development type and quantum and any potential building retention.</p> <p>In respect of the latter, whilst we recognise the desire of the local community to see some buildings and/or uses retained/reopened, there must be consideration of the impacts of doing so and the costs involved. The planning application process is the most appropriate method for making such judgements.</p>
19	9.6	<p>Homes England support the provision of high quality, affordable homes. The planning application submitted for the redevelopment of the Pirbright Institute proposes Local Plan compliant 30% provision. The types and tenures of homes to be provided, to meet local requirements, will be based on advice from WBC Officers.</p>
21	Policy C2	<p>We cautiously welcome the reference to an approximate level of development on the Pirbright Institute site. Further, we agree that it is necessary for an application to demonstrate that development will be appropriate in the context of the village and wider AONB.</p> <p>We welcome what appears to be the general thrust of Policy C2, namely to ensure that development is appropriate whilst recognising that, whilst there are reasons why further development (above the HSA allocated level) may be required (for instance in relation to viability/deliverability), there are significant benefits to working to deliver high quality development on this site. Further, development of this site, within the village itself, has the potential to deliver local needs housing whilst protecting the village for potential green field redevelopment on the village fringe.</p>
21	9.11	<p>Note previous comments in respect of viability/soundness at the time of examination/adoption of the HSA DPD and subsequent changes in context.</p>
22	9.12	<p>We do not agree with the blanket approach given to density, and thus development capacity of the Pirbright Institute site.</p> <p>The supporting technical work to the planning application addresses the wider density of Compton, noting that in places it is above 20dph, i.e. development density is not uniform across the village area. To apply a blanket approach would be inappropriate and fail to make best use of brownfield land. Such an approach could lead to speculative development proposals on greenfield sites and lead to inappropriate sprawl.</p> <p>Further, an unjustified, low density cap on development on the Pirbright Institute site risks limiting the ability to remediate and redevelop the site in respect of the costs of providing a 'clean' site.</p>



22	9.14	<p>Homes England fully support the need to demolish and remediate the Pirbright Institute site prior to redevelopment. The current planning includes this as a first principle and, following the grant of planning permission, we/our partners will undertake demolition and remediation ahead of development.</p> <p>As recognised within the paragraph, the costs of this work are a factor that will be considered alongside an assessment of what scale of development is appropriate for the site. However, it is essential to recognise that these costs are significant and that viability assumptions made at the time of drafting/adopting HSA DPD Policy 23 are no longer relevant. It is entirely appropriate for the planning application determination process to make those judgements by exercising the established planning balance.</p>
23	9.16	<p>Reference to density in a blanket form is not considered to be the most appropriate approach to ensure a high quality, comprehensive redevelopment of the Pirbright Institute site. It is considered that there is scope for the site, and wider village, to accommodate a range of development types/sizes with varying density across the site. It is imperative that a 'one size fits all' approach is avoided.</p>
28	Policy C6	<p>We support the principle of delivering a range of one- and two-bedroom homes.</p> <p>However, redevelopment of the Pirbright Institute hostel site is not the most appropriate method for achieving this. Firstly, such an approach would prevent a mix of homes being provided across the site, effectively segregating smaller homes in to one area. Secondly, the hostel buildings are not considered to be in an appropriate condition to form part of a comprehensive development. There are a range of issues here, including but not limited to design, accommodation layout, development form, parking and building/environmental performance standards.</p> <p>Homes England are committed to providing a range of house types/sizes across tenure types throughout the development.</p>
29/30	Policy C7/para 11.11	<p>Homes England are committed within the planning application for the Pirbright Institute to provide a range of homes across size/type/tenure. We therefore support the broad approach/principle of Policy C7</p> <p>However, we would suggest that the Policy could be improved by removing reference to Area B in order to ensure that development can be delivered flexibly across the site, taking account of site constraints.</p>
31	Policy C8	<p>We support the principle of development achieving high standards of design. Reference to the Government's National Design Guide is welcome.</p> <p>Homes England work to ensure our development partners adhere to the principles of Building for a Healthy Life (update of Building for Life 12). Reference to the guide might provide further clarity to the policy and ensure that all parties understand the standards that are required and are able to work from a common benchmark that will have been found elsewhere across the county/country.</p>

33	Policy C9	Broadly support the principles of the policy subject to updating the reference from 'Building for Life' to 'Building for a Healthy Life'.
35	Policy C10	<p>Criteria a) – we consider that it is inappropriate to stipulate the consideration of potential tourism use. Whilst 'alternative uses, potentially including tourism' might be appropriate, not all existing employment uses will have the potential to convert to tourism use and as such the policy will place an inappropriate stipulation on potential change of use applications.</p> <p>Criteria b) – unnecessary as replicates principles established within wider planning practice.</p>
36	Policy C11	<p>Homes England support the principle of redeveloping the former Pirbright Institute site as a mixed-use development; the submitted planning application demonstrates this. However, as worded, Policy C11 is overly restrictive for a number of reasons.</p> <p>Firstly, it places unreasonable restrictions/requirements on the use/type/size of employment floorspace to be provided. Secondly, reference to the re-use of existing buildings is inappropriate given the previous use of those buildings and the recognised importance (noted elsewhere within the draft NP e.g. para 9.14) to undertake full demolition and remediation prior to redevelopment.</p> <p>In simple terms, the demolition and remediation of some buildings and their immediate surroundings, whilst retaining others, is impractical and risks contamination remaining on site.</p>
40	Policy C13	<p>It is not considered appropriate for the draft NP to place such tight requirements on the possible reuse and reopening of facilities, in particular the nursery. As drafted, there is no consideration of how such facilities would be funded or operated and it is both unreasonable and unrealistic to expect redevelopment of the site with such constraints.</p> <p>With regard to the cricket ground, the current planning application proposes the retention with scope for re-opening and adoption as formal public open space for the wider community.</p>
43	Policy C15	Where appropriate to the site, Homes England supports this principle subject to appropriate consideration, on each case, in respect of adoption. The application for the Pirbright Institute site proposes to improve cross site connections, linking existing public rights of way.
44/45/46	Policy C16	Homes England support the principle of retaining the cricket ground at the former Pirbright Institute. This is a feature of the current planning application.
48	Policy C17	Homes England support the principle of the policy. We welcome the policy not establishing a set measured target (this is more appropriate at Local Plan/National level where an appropriate 'credits' system can be established).

		The current planning application for the Pirbright Institute site identifies a net gain in biodiversity both in terms of available green space and improvements to the existing spaces/features. The principles of a landscape-led approach are supported.
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Comments can be submitted by returning the Comments Form by :

- **Email to :** [comptonndpsec2@gmail.com](mailto:comptonndpsec2@gmail.com)
- **Placing in** the Collection box in the Compton Village Shop

Or by completing the form online at <http://www.comptonndp.org.uk/community/compton-neighbourhood-development-plan-13450/regulation14-consultation/>