


**West Berkshire Local Plan Review 2022-2039**
**Proposed Submission Representation Form**
**Ref:**
*(For official use only)*

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

This form has two parts:

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

**PART A: Your Details**

*Please note the following:*

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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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

	Your details	Agent's details (if applicable)
Title:	Mr	
First Name:*	Peter	
Last Name:*	Rawlinson	
Job title (where relevant):	Planning Manager	
Organisation (where relevant):	Gleeson Land	
Address* <i>Please include postcode:</i>	Sentinel House Harvest Crescent Fleet Hampshire GU51 2UZ	
Email address:*	████████████████████	
Telephone number:	01252 360319	

\*Mandatory field

**Part B – Your Representation**

***Please use a separate sheet for each representation***

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

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

Section/paragraph:	
Policy:	Policies SP3, SP4, SP5, SP12, & SP19
Appendix:	
Policies Map:	
Other:	

**1. Legally Compliant**

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

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

Yes  No

*Please give reasons for your answer:*

***Please see attached letter***

## 2. Soundness

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

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

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

Please tick all that apply:

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

Please give reasons for your answer:

*Please see attached letter*

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

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

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

Yes

No

**x**

Please give reasons for your answer:

*Please see attached letter*

#### 4. Proposed Changes

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

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

*Please see attached letter*

#### 5. Independent Examination

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

Yes

No

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

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

#### 6. Notification of Progress of the Local Plan Review


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

Please tick all that apply:

Tick

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

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

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

Gleeson Land  
Sentinel House  
Harvest Crescent  
Fleet  
GU51 2UZ

Sent by email to: [planningpolicy@westberks.gov.uk](mailto:planningpolicy@westberks.gov.uk)

Date: 3<sup>rd</sup> March 2023

Dear Sir/ Madam

## **West Berkshire Local Plan Review Proposed Submission Version (Regulation 19) Consultation**

Thank you for the opportunity to provide a response to the Council's Local Plan Review (LPR) Regulation 19 Consultation, referred to in this response as the 'Plan'. The following representations are submitted by Gleeson Land in relation to our land interests at Land Adjoining Man's Hill, Burghfield Common, RG7 3BD. HELAA reference BUR9.

### **Policy SP3 Settlement Hierarchy**

Gleeson supports the settlement hierarchy set out under Policy SP3 which identifies Rural Service Centres such as Burghfield Common as offering development potential appropriate to the character and function of the settlement. As set out in the supporting text the services and facilities provided by Rural Service Centres such as Burghfield Common provide a focal point for the surrounding villages and rural areas, and are sustainable locations for new development.

[REDACTED] ly defined Detailed Emergency Planning Zone (DEPZ) around AWE sites of [REDACTED] and limit the development potential of those areas and specific regard should be given to Policies SP2 North Wessex Downs AONB and SP4 Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment (AWE) Burghfield. Burghfield Common is not within the AONB but is now within the enlarged AWE Burghfield DEPZ.

### **Policy SP4 Atomic Weapons Establishment (AWE) Aldermaston and Atomic Weapons Establishment**

The policy explains that in the interests of public safety, and to ensure that any new developments do not pose an external hazard to the AWE sites, residential development (among others) located in the Detailed Emergency Planning Zone (DEPZ) of AWE Aldermaston and AWE Burghfield is likely to be refused planning permission by the Council, especially when the Office for Nuclear Regulation (ONR) and/or Ministry of Defence (MoD) (or their agents) have has advised against that development and/or object. The Plan clarifies that the ONR will be consulted on, *'any new development, re-use or re-classification of an existing development that could lead to an increase in residential or non-residential populations thus impacting on the off-site emergency plan'*.

Footnote 11 in relation to the consultation criteria notes that these criteria may change over time and that Policy SP4 reflects the Council's intention to follow the latest ONR guidance from time to time. Gleeson supports the Council following the ONR advice as and when it may change.

Paragraph 4.61 sets out that under the Radiation (Emergency Preparedness and Public Information) Regulations 2019 (REPPiR) legislation a formal review of the DEPZ is required on at least a 3 yearly basis, or if there is a material change in work with ionizing radiation. *'This may result in the DEPZ for either AWE site remaining the same, extending or reducing in size and geography over time. These will be kept under review.'* Should the area covered by the DEPZ change as a result of new modelling, or if the advice of the ONR changes, then it is considered that the Council's approach to new development within the currently affected areas should also change.

The Plan sets out that the ONR advice on a particular development will be influenced in part by whether or not they receive adequate assurance from the owner of the Off-Site Emergency Plan (the Council) that the development can be accommodated within that Plan. If it is considered that the AWE Off-Site Emergency Plan would be adversely affected with no viable and sustainable mitigation options public health would not be protected and then the West Berkshire District Council Emergency Planning Service would submit evidence against the development to the local planning authority. The ONR will also provide advice for developments that potentially pose an external hazard to the AWE sites.

The newly inserted text at paragraphs 4.57 to 4.61 further explain that *'given the potentially cumulative effects of any population increasing surrounding the AWE sites, it will be necessary to monitor committed and future approved but not built development in partnership with neighbouring councils. The Councils will monitor housing completions and commitments as part of the Annual Monitoring Report and send this information directly to the Emergency Planning Services in each council and the ONR for them to make informed judgements when assessing future development proposals.'* This suggests that rather than all new residential development [redacted] the acceptability of new development will depend on the capabilities of [redacted] to respond to populations in the DEPZ. The capabilities of the Emergency Planning Services may change over time and if the capability of the Emergency Services improves then consideration should be given to whether any new residential development could come forward at Burghfield Common, without unduly affecting the off-site emergency plan for AWE Burghfield. If this potential does arise allocations should be made for residential development at Burghfield Common to support its important role as a Rural Service Centre. The Council should work alongside the emergency services to improve their [redacted] any off-site emergency arising from AWE Burghfield. The goal should be for additional response capacity that would enable a suitable amount of development to come forward to support the continued role of Burghfield Common as a Rural Service Centre. If future development within the DEPZ is completely curtailed this will have negative impacts on the existing population and stifle sustainable development.

Paragraph 6.35 states that *'If in the future the DEPZ is reviewed and the emergency planning arrangements be amended, then future reviews of the Local Plan will consider whether strategic allocations in the area would be suitable.'* This provision is supported and it is considered that should a material change occur during the plan period to the DEPZ then a review of the plan should be commenced at the earliest opportunity. The Plan

could be affected if the DEPZ expands or contracts. If the DEPZ expands it may encompass sites allocated for development. If these sites consequently become unviable there would be a negative effect on the Council's housing land supply and housing delivery that will need to be rectified. Alternatively if the DEPZ is reduced in size this may result in land previously within the zone becoming unrestricted and therefore potentially suitable for sustainable development. The Plan still recognises that Burghfield Common as a Rural Service Centre is a sustainable settlement, despite it now being wholly within the restrictions of the DEPZ. New development in sustainable locations has been proven to bring numerous social, economic and environmental benefits and if the DEPZ changes it is also considered that an early review of the Local Plan should be commenced at the earliest opportunity to enable the consideration and allocation of land that may then be outside of the DEPZ for development.

## SP5 Responding to Climate Change

Gleeson supports the Council's intention to improve the resilience of land, buildings and existing future communities to the opportunities and impacts arising from climate change. However it is considered that the most effective way for this goal to be achieved will be through following the national Future Homes Standard that will be delivered through building regulation changes, which will require new homes to be zero carbon ready by 2025. There is no need to replicate this requirement in Policy SP5 (c) and (d), and it is therefore considered that these points should be removed from Policy SP5.

## SP12 Approach to Housing Delivery

The Council's use of a range between two potential housing targets of between 8,721 and 9,146 dwellings, or between 513 to 538 dwellings per annum is not specific or clear. The National Planning Policy Framework (NPPF) at Paragraph 16 (d) states that Plans should '*contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals*'. A housing delivery range is not clear or unambiguous. A range could result in time wasted in future planning determinations or appeals, [REDACTED] should be used when calculating the Council's five year housing land supply [REDACTED] housing delivery against the target. NPPF Paragraph 66 sets out that '*Strategic policy making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period.*' The NPPF does not refer to identifying a range for a housing target it requires a specific figure. Furthermore, NPPF Paragraph 60 refers to the Government's objective of significantly boosting the supply of homes. Given this overarching aim it is considered that the housing target should be [REDACTED] 5 dwellings or 538 dwellings per annum.

The Local Plan also at paragraph 6.6 recognises that Reading Borough Council has an identified shortfall of 230 dwellings. Whilst the Plan confirms that this need should be met within West Berkshire it stops short of actually agreeing the distribution of this unmet need, and states this will be subject to further review. If the unmet need has been identified, and that it will be accommodated within West Berkshire has been established, there is no reason to delay meeting this need and it should be included in the Council's housing requirement now and not put off for a further review. Sites should also be allocated now to meet this identified need.

## SP19 – Affordable Housing

The Local Plan at paragraph 6.83 sets out that there is a high need for affordable housing across the District with a net affordable and social rented housing need equivalent to 330dpa. Based on an overall housing target of the higher range at 538dpa the affordable need represents 61% of the total housing target. The affordable housing percentage being sought by the Council is 30% on previously developed land, 40% on greenfield land and 20% for developments of between 5 and 9 dwellings. This means the affordable need will not be met. Accordingly the Council should increase the overall housing target so that the delivery of the much needed affordable homes also rises.

## Conclusion

To summarise the above points, Gleeson Land supports the overall intentions of the Local Plan Review to deliver sustainable development for the district, the settlement hierarchy and the spatial strategy. However, it is considered that there should be a requirement for an earlier review of the Local Plan should any changes arise in the AWE Burghfield and AWE Aldermaston DEPZ's or the capabilities of the Emergency Planning Services that may change the acceptability of new residential development in areas currently covered by the DEPZ. In addition the housing target should be more clearly defined at the upper end of the given range. It should be clear throughout the whole Plan that the housing target is for 9,146 dwellings (538dpa), plus the 230 dwellings of unmet need from Reading Borough Council. This unmet need should be provided for in new site allocations now, rather than being left for a later review. Serious consideration should also be given to increasing the overall housing target further to support the delivery of more affordable homes given the very high need for such homes.

Yours faithfully,



Peter Rawlinson  
Planning Manager  
T: 01252 360 319

