

Comment

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Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	West Berkshire Green Party ([REDACTED] - 1335160)
Comment ID	PS743
Response Date	03/03/23 15:35
Consultation Point	Policy SP 16 Sandlesford Strategic Site Allocation (View)
Status	Processed
Submission Type	Web
Version	0.1
Bookmark	West Berkshire Green Party

1. Do you consider the Local Plan Review is legally compliant?

Please see the guidance note for an explanation of what 'legally compliant' means

Yes

2. Do you consider the Local Plan Review is sound?

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

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

Please tick all that apply:

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. . No

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . No

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

I do not accept that the area's need has been "objectively assessed". The target for housing is an arbitrary figure based on government guidelines which the government itself has now disowned. The draft plan takes no account of this. West Berkshire has particular issues, notably that a large part of the district falls within an AONB, that make the target in the plan unrealistic without two large developments on greenfield sites that in my view are not consistent with the NPPF and are contradictory to many parts of the draft plan itself.

The plan is not an appropriate strategy for the reasons given above.

The plan is not deliverable because, as the history of its predecessor demonstrates, developments on the scale of Sandleford Park and Thatcham NE are not deliverable within the plan period.

I do not believe that the plan enables the delivery of sustainable development in accordance with the NPPF.

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

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

Yes

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 Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

SP16

Inclusion in the draft plan of further development at Sandleford Park contradicts the very first strategic policy in the plan, SP1 (spatial strategy), which says priority should be given to sites of "lower environmental value", on "previously developed land," and "conserving and enhancing the distinctive character and identity of the natural environment".

It is also inconsistent with SP10 (green infrastructure), which seeks to prevent the loss of green spaces and to "extend wildlife corridors and provide habitat connectivity", with DM15 (trees, woodland and hedgerows) and DM16 (ancient woodland).

SP 11 (biodiversity and geodiversity) states: "A network of green infrastructure will be provided which will conserve the areas of ancient woodland and provide appropriate buffers between the development and the ancient woodland." There are several areas of ancient woodland on this site. The draft plan does not explain what it means by "appropriate buffers" but the council has indicated that it considers 15 metres appropriate, despite the following:

"Although the minimum size of a buffer zone should be at least 15 metres, we would expect this to be significantly larger for a development of this nature and size." (Natural England)

"It is considered that a buffer of greater than 15m would be appropriate for the ancient woodland on this site and that a buffer of 30m would be appropriate in areas where the ancient woodland is immediately adjacent to the built development ... If this development were to proceed with the currently proposed 15m buffer zone, it is likely that these ancient woodlands will deteriorate for the reasons stated above and the council will fail to meet its statutory obligations under the Natural Environment and Rural Communities Act (2006) and will fail to meet the policy objectives of both the NPPF and West Berkshire Core Strategy." (Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust)

The Woodland Trust recommends 50 metres; Kings Lynn & West Norfolk Council agreed a 50-metre buffer for its Reffley Wood site and Wiltshire County Council's policy is "a 100-metre woodland/parkland buffer between all ancient woodland ... and built development".

At an absolute minimum, therefore, SP16 should contain clear guidance on what precisely it considers an appropriate buffer for ancient woodland in line with the above comments and policies, and indeed the policies included elsewhere in the draft plan.

SP16 is inconsistent with the NPPF (2018) on biodiversity which it defines as "development that leaves the environment in a measurably better state than beforehand". It is inconceivable that further Sandleford Park development, on a wildlife-rich greenfield site, can meet this requirement.

It is also inconsistent with SP23, which says that development should "minimise the impact of all forms of travel on the environment" (in accordance with the council's climate emergency and environment strategy). The location of the site in relation to Newbury Town Centre makes it inevitable that many if not most residents would be reliant on cars. One only has to look at comparable developments (for example the Glendale Avenue estate on the opposite side of the A343) to realise that Sandleford Park will maximise, rather than minimise, the impact of transport (and in particular private cars) on the environment because of its location.

However much wishful thinking the council engages in, the fact is that the location of Sandleford guarantees that many if not most people living there will rely on the private car for most journeys.

SP16 further contradicts the draft plan on DM2 (separation of settlements) where the proposed expansion of Sandleford Park southwards, with access via Warren Road, significantly reduces the separation between Newbury and Enborne Row/Wash Water. Developers are already proposing "Sandleford Park South" which would remove this separation entirely and create a single housing development from Monks Lane to the Hampshire border. The plan as drafted can only encourage rather than prevent this process because it clearly identifies Sandleford as the principal area of Newbury for development.

SP16 is also in conflict with DM8 (Air Quality), which says it should not expose occupiers who are particularly sensitive to air pollution, such as those in schools, healthcare establishments or housing for older people. By changing the sustainable transport link via Warren Road to a main access route, vulnerable users will be subjected to additional air pollution. Warren Road is literally a few metres away from Park House School, opposite Falkland School, and close to at least one of the proposed Sandleford development schools.

The Warren Road access road is perhaps the least acceptable and explicable part of SP16. Previously this had been designated for pedestrians, cyclists and public transport only. Without explanation, in the new draft plan this has now been redesignated for "primary all-vehicle access". This is clearly in conflict with SP23 and DM8 and in addition will completely change the character and environment of the entire Wash Common area. It is outrageous that this change has appeared in the draft plan without any explanation or justification.

For all these reasons it is the view of West Berkshire Green Party, the minority Green Group of West Berkshire councillors, the official opposition Green Group of Newbury town councillors, and myself as Green Party councillor for Newbury Wash Common ward (West Berkshire Council) and Wash Common ward (Newbury Town Council) – which includes the Sandleford Park site – that SP16 is in conflict with numerous elements of the draft plan, the NPPF, and indeed government policy on housing allocations, and therefore renders the current draft plan unsound.

One final point is that although Bloor Homes' application to develop the first phase of Sandleford Park was granted outline planning permission on appeal, for up to 1,000 homes, this has no bearing on the rest of the allocated site. The draft plan includes 1,500 homes, envisaging 500 in addition to the Blair Homes development. However, we would argue that these 500 homes should be removed from the plan for all the reasons stated in this submission, particularly as they would have a far more seriously detrimental effect on the area because of Warren Road access.

5. Independent Examination

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

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.

As West Berkshire councillor for the ward that includes Sandleford, I have an in-depth knowledge of the issues affected by SP16 and feel it would be beneficial for the examination if I were able to participate and answer any questions that may arise.

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

The submission of the Local Plan Review for Independent Examination . Yes

The publication of the report of the Inspector appointed to carry out the examination . Yes

The adoption of the Local Plan Review . Yes