



West Berkshire Local Plan Review 2022-2039
Proposed Submission Representation Form

Ref:

(For official use only)

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




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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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:*	Paul	
Last Name:*	Morgan	
Job title <i>(where relevant):</i>		
Organisation <i>(where relevant):</i>		
Address* <i>Please include postcode:</i>		
Email address:*		
Telephone number:		

*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):	
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	
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:

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
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		x
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		x
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		x
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		x

Please give reasons for your answer:

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

Please give reasons for your answer:

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.

The Local plan as it currently stands is, in my opinion, a poorly presented document and does not provide up to date evidence or sufficient detail to provide a sound basis for a local plan that will be in place until 2039.

It appears rushed and ill considered in many areas. The public really should have had the opportunity to question and clarify directly with the authors at a "Town Hall" type presentation / exhibition / seminar.

5. Independent Examination

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

Yes

 Yes

No

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

I have outlined my views on the attached document.

"Paul Morgan Local Plan REG19 Comments. Docx"

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	x
The publication of the report of the Inspector appointed to carry out the examination	x
The adoption of the Local Plan Review	x

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.

Signature	Paul Morgan	Date	03/03/2021
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

Comments / representations in respect of West Berkshire Local Plan Review (Reg 19) Proposed Submission

General observation

The Document is difficult to read, it lacks details, lacks cohesion and is not evidence based. For such an important plan the public should have been provided with the opportunity to see a presentation / exhibition and been allowed to ask questions / seek clarification from the authors. It feels like everything is being done behind closed doors and the public will be presented with a fait accompli.

It would appear that the current ADPP areas :ADPP1 Spatial strategy; ADPP2 Newbury; ADPP3 Thatcham; ADPP4 Eastern SP1 Spatial strategy - Area; ADPP5 AONB; ADPP6 East Kennet Valley, will be replaced by three SP1 areas: Newbury and Thatcham; Eastern Area North Wessex Downs AONB. What is the rationale behind this? why are Newbury and Thatcham now lumped together, where are the SP1 plans for Newbury and Thatcham etc.

How will this fit in with Neighbourhood Plans (NP) and how will NPs be incorporated?

The Berkshire Local Plan Review (Reg 19) Proposed Submission is totally disjointed and does not take a holistic view and is not based on evidence. For example, no reference is made to the current situation at the Vodafone Campus where 3 very large purpose built offices will soon be empty. The same applies to Turnpike Estate, where the old Quantel factory will soon be vacant.

London Road Industrial Estate / Faraday Road football Ground

Over the past 5-10 years West Berkshire Council have spent £Millions of taxpayer's monies with external consultants / property developers such as St Modwen; Strutt & Parker; Avison Young, Hemmingway design, etc. with respect to the London Road Industrial Estate

The A339 link road into the LRIE estate was built as part of the original scheme. The original budget was £2.9 million but the actual costs were over £5.2 million, funded by WBC, Thames Valley Berkshire Local Enterprise Partnership and the Dept of Transport

As part of the LRIE scheme WBC prematurely and unnecessarily closed the Faraday Road Football Stadium, an Asset of Community Value (that has been there since 1963, and pre-dated the LRIE). The cost of closing the ground and funding replacement facilities (that would not be needed if the football ground remained) again runs into £ millions

In June 2022 the Council signed off a further £850k for planning and consultancy to help deliver LRIE projects as part of another scheme called the London Road Industrial Estate Project Refresh (EX4219)

Despite the £ millions already spent the policy that WBC has adopted clearly has spectacularly failed.

The local plan should provide the Council with the opportunity to look again at the evidence and options that would deliver the most benefits to the public for a key location that is in central Newbury. By only referring to it in one paragraph Page 84: 7.10 it has to be assumed



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that the planning team are deliberately trying to avoid scrutiny from external parties to the mess that has been created and the lack of any deliverables for the huge sums spent.

The London Road Industrial Estate Project Refresh (EX4219), published in June 2022 only covers 2 sites 1) the Depot site and 2) the football ground - "the Depot site redeveloped for employment use by end of 2024" and "the playing field site redeveloped for employment use by end of 2026.

The football ground is NOT nor ever has been part of the LRIE - it is not a Designated Employment Area. The football ground should be treated on its own merits and NOT part of a "land grab" as part of a wider LRIE development proposal. The football ground is still classified as a football ground and has approved planning permission based on this status.

- 20/01966/COMIND – Renewal and expansion of the existing football pitch to form a new 3G main pitch and a smaller 3G training/practice pitch.
- 20/01530/OUT – Outline permission for replacement of clubhouse and new spectator stand at Newbury Football Ground. Matters to be considered: Access and Layout
- 21/07575/CERTE – Confirmation of lawful use of land as a football ground under class F2 of the Use Classes Order (Amendment 2020)

As such the football ground should NOT be subsumed as a land grab for the LRIE.

The football ground is clearly and well defined within the current West Berkshire Core Strategy (2006 - 2026) Development Plan Document which was adopted in July 2012

The principle policies in the Core Strategy that cover the football ground are:

- a. Area Delivery Plan Policy 2 Newbury (ADPP2)
- b. CS18

This local plan should provide as a minimum the same level of protection / status.

Paul Morgan