



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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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:	Dr	
First Name:*	David	
Last Name:*	PEACOCK	
Job title (where relevant):	Chair	
Organisation (where relevant):	The Newbury Society	
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):	The Newbury Society
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	10.81
Policy:	DM9
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		
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		
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		N
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		N

Please give reasons for your answer:

In considering the West Berkshire Local Plan at this stage, we have considered the tests of soundness – whether the Local Plan is positively prepared, justified, effective and consistent with national policy, and wish to make the following comments.

General

Some of the policies in this Local Plan do not appear to be achievable (i.e. effective) without government intervention; for example, some of the carbon-reduction policies. The aim of building carbon-neutral housing (3.1 p. 10) is admirable and should be pursued; but in order for this to be achieved, in practice it would require changes to the (national) building regulations.

Roads

There is nothing in this Local Plan about the strategic road network. The view seems to be that the roads can time and time again take another 100 houses with just another tweak to the Robin Hood roundabout. In considering additional houses, and particularly when considering additional houses on sites involving more than 1,000 houses at a time, WBC needs to actively consider the consequences for the strategic road network.

If several thousand new houses are to be built locally, would this require some new strategic roads to take traffic away from the Robin Hood roundabout (For example, a road from the A339 Swan Roundabout to the A343 Andover Road; a road from the Andover Road to the A4/A34 interchange west of Newbury; or a road from the A34/A339 interchange north of Newbury across to north Thatcham)? These consequences would represent major changes for the area, and need to be considered alongside the proposals for housing development, not at some later stage.

Historic Environment

POLICY SP 9 (p. 42)

Although the role of the HER (Historic Environment Record) receives attention in the Local Plan, we

do not see any detail included here to support the role of the council’s conservation officers, which (for us) appears crucial if this “positive action” for conservation of “heritage assets” is to take place.

Conservation Areas

Policy DM9 on Conservation Areas is misleading and flawed (see 10.81 p. 220).

West Berkshire Council has been repeating general assurances about Conservation Area Appraisals for many years, with little sign of progress. In the 1990 (*sic*) Local Plan (policy B.ENV.6), WBC’s predecessor Newbury District Council stated that “The District Council will encourage the preparation and implementation of schemes to preserve and enhance Conservation Areas.” In this Local Plan WBC now says it is undertaking a “phased programme of Conservation Area Appraisals.” What has actually happened for the 53 CAs across West Berkshire (mostly created in the 1970s and 1980s), is that 51 of them have never had Appraisals adopted.

In 2010, two CAAs were adopted; and in the 13 years since then, no CAAs have been adopted, in spite of several documents being put forward from different parishes in the hope that these will encourage action from WBC. Of the six conservation areas in Newbury, created from 1971 onwards, none has ever received an Appraisal. In practice, despite its assurances, WBC is not following national policy on the creation of Appraisals, let alone on their regular review.

Far from facilitating local involvement, as national policy indicates and the current draft Local Plan suggests, WBC has ignored or rejected approaches for nearly 20 years. Submissions from Newbury Town Council were made as long ago as 2006. Even in work on preparing the recent draft Appraisal for Newbury town centre, WBC deliberately excluded participation from Newbury Town Council and community groups such as The Newbury Society.

The Conservation Area Working Group (named in this policy) has not met since March 2020. Its status is unclear (- Is it an informal group?), and it was not even notified by WBC about the Newbury town centre draft Appraisal, let alone consulted. In addition, any progress at all in WBC adopting CAAs was dependent upon the limited time of its conservation officer(s), yet over the past year this has been heavily cut, to effectively remove them from future involvement and to stall future efforts. A policy which consists of empty words, and can be demonstrated as such, cannot be considered sound, effective or consistent with national policy.

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 Y 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.

In the light of 2. above, policy DM9 needs to be rewritten to put forward a clear and achievable policy for the preparation of some Conservation Area Appraisals for West Berkshire, referencing resources required.

Heritage should be seen as one element of sustainability.

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

N

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

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	David Peacock	Date	3 March, 2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.