


	<p><b>West Berkshire Local Plan Review 2022-2039</b></p> <p><b>Proposed Submission Representation Form</b></p> <p><b>Ref:</b></p> <p><i>(For official use only)</i></p>
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<b>Please complete online or return this form to:</b>	<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

<b>PART A: Your Details</b>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> <li>• We cannot register your representation without your details.</li> <li>• Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</li> <li>• All information will be sent for examination by an independent inspector</li> <li>• 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 <a href="http://info.westberks.gov.uk/privacynotices">http://info.westberks.gov.uk/privacynotices</a></li> </ul>		
	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:	'Spring Meadows Action Group'	Ms
First Name:*		Susan
Last Name:*		Maughey
Job title <i>(where relevant):</i>		Planning Consultant
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 ( <i>and client if you are an agent</i> ):	Agent: Susan Maugey Client: Spring Meadows Action Group
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### **Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	Chapter 8 – ‘Non-Strategic Site Allocations’
Policy:	Page 166, draft policy RSA19 – Land west of Spring Meadows, Great Shefford
Appendix:	
Policies Map:	Site GS1
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:*

I have no reason to believe otherwise

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

Please give reasons for your answer:

The sustainability of Site GS1, given the provisos under draft policy RSA 19 is questioned for the reasons set out in the accompanying representations.

## 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:

I have no reason to believe otherwise

#### 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.*

My representations solely relate to Site GS1

#### 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	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.*

<b>Signature</b>	<b>Ms S Maugey</b>	<b>Date</b>	<b>03/03/2023</b>
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**Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.**

## Local Plan Review Representations

### Site Allocations: Land west of Spring Meadows, Great Shefford

#### Draft Policy RSA 19

1. This open piece of land, a green field located immediately beyond the north-western end of Spring Meadows, has been allocated by West Berks Council as a potential site to be developed for residential purposes. Referenced in the draft Local Plan's Submission version as '**Site GS1**', the text indicates that the site could accommodate approximately 15 dwellings.
2. The site's northern boundary lies adjacent to the narrow, un-made track off Wantage Road. Clearly, this would be unsuitable to facilitate access to the site, so the intended access point is shown set between nos 41 and 43 Spring Meadows, which is currently a short cul-de-sac spur. This point would serve as both the site's ingress and egress. For safety purposes, this would also necessitate a footway, most likely to both sides of the intended carriageway, thereby adding significant width to the existing road.
3. Draft policy RSA 19 states:

*'Measures will be included to improve accessibility by, and encourage use of non-car transport modes. These measures will be set out in a Travel Information Pack.'*

What do the above sentences actually mean, and would such an intention be realistic in practice? The means of achieving the objective is vague in the extreme and does not provide sufficient certainty and effective mitigation measures so as to justify the site's allocation for housing.

There is already heavy reliance on the private car due to the general absence of goods, services and facilities in proximity to Spring Meadows. This puts into question the sustainability of location for additional housing. The provision of cycle routes to serve the site are mentioned but, again, this would hardly make any significant difference to the amount of vehicular traffic and associated movements generated by the development of 15 new dwellings.

4. Shefford C of E Primary School and its grounds sit beyond the site's southern boundary. During the daily drop-off and pick-up times additional cars are parked, short-term, at the kerbside – some perhaps inconsiderately - and, as a result, there is potential vehicular/pedestrian conflict. Additional housing would only exacerbate the situation.
5. The draft policy indicates that a 'landscape visual impact assessment' (LVIA) would be required to justify any proposed development of the site. However, it is noted that, save for the indication that the housing units would be kept away from the site's northern boundary, there is little, if anything, to suggest that any initial LVIA

assessment has already taken place to demonstrate that the intended quantum of development would satisfactorily integrate into its surroundings.

6. In November 2023 it will be mandatory for developers to deliver a minimum of 10% Biodiversity Net Gain (BNG) on development sites. It is not clear whether the site is of sufficient size to accommodate 15 dwellings and their respective curtilages, adequate roadway, associated hard-surfacing, landscaping and also informal open space so as to allow for the requirement.
7. The draft policy mentions that a flood risk assessment will be required to accompany any application for development. This suggests that the site lies within either Flood Risk Zones 2 or 3 and, notwithstanding any mitigation measures necessary, it means that the sequential test exercise would firstly need to be carried out to see whether new housing could be placed on Flood Zone 1 land, instead.
8. It is also indicated that any planning permission for housing may necessitate that the development be phased due to pressures on the local foul drainage system. This is unusual and suggests that the development of additional housing in the immediate area may give rise to future problems in this regard.
9. A further issue relates to the requirement for nitrate neutrality, due to the nearby River Lambourn SSSI/SAC. New housing in proximity will require for a mandatory Habitats Regulation Assessment, and the response from Natural England (the relevant statutory consultee) would be crucial to the scheme's acceptability and viability.
10. Finally, the land lies outside the settlement boundary of Great Shefford. There are green fields lie to the north and west of the site and, although all development proposals must be determined on their respective planning merits and/or impacts, the development of this piece of land would likely be the catalyst for other such land to subsequently be given over to housing. This would be to the detriment of the wider area's open character and the visual amenities currently enjoyed by existing residents.