


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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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:*		Jonathan
Last Name:*		Walton
Job title (where relevant):		Planning and Development Director
Organisation (where relevant):	Newbury and Crookham Golf Club and Chartfield Homes	Opus Works
Address* <i>Please include postcode:</i>	33-35 Burys Bank Road, Newbury, Thatcham. RG19 8BZ	Gardenia House Church Lane Ewshot Farnham GU19 5BJ
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):	Newbury and Crookham Golf Club and Chartfield Homes (joint representations), made by Opus Works on behalf of the clients
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP1, SP3, SP7, SP8, SP10, SP11, SP12, SP13, DM35, DM39
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.

Please see attached letter covering all representations and proposed changes, where relevant.

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:

To enable the Local Plan to recognise the further assistance needed for rural business and leisure facilities and to underpin a robust mechanism to allow enabling development to come forward to help realise this, where appropriate.

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

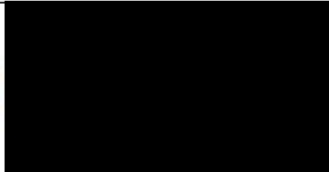
Do you wish to be notified of any of the following?

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		Date	03/03/23
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

P19-3096PL

3rd March 2023

West Berkshire Local Plan
West Berkshire Council
Council Offices
Market Street
Newbury
RG14 5LD

Dear Sir/Madam

Re: West Berkshire Local Plan Review 2022-2039: Reg 19. Proposed Submission. Representations submitted on behalf of Chartfield Homes and Newbury and Crookham Golf Club.

We have reviewed the Local Plan Review (LPR) and we wish to submit a number of representations in response to policies and proposals, which impact upon the development plans of Newbury and Crookham Golf Club (NCGC), particularly in light of ongoing determination of the plans for redevelopment of the existing clubhouse (ref: 22/01400/FUL), which is proposed to be financially enabled via a residential development of 31 units (ref: 22/01448/FULEXT).

In the paragraphs below, we will identify the relevant policies and proposals before commenting on them either in support, or in the form of an objection, which we trust West Berkshire Council (the Council) as Local Planning Authority (LPA) will give careful consideration, before the submission draft of the Local Plan Review is published and submitted for examination.

Policy SP1 – Spatial Strategy

This policy states that the overall approach to development will be based on three spatial areas:

- Newbury and Thatcham
- Eastern Area
- North Wessex Downs AONB



Newbury is identified as a focus for housing development. NCGC is located on the south-eastern edge of Newbury. Therefore, in accordance with policy SP1, it is a suitable and sustainable location for housing development.

Policy SP1 – Spatial Strategy is supported.

Policy SP3 – Settlement Hierarchy

This policy states that development in West Berkshire will comply with the spatial strategy set out in policy SP1. Development will be focused on the most sustainable settlements. The Urban Areas (including Newbury) will be the prime focus for housing and economic development, offering development potential through: regeneration of built-up areas; allocated sites in the LPR and Neighbourhood Plans; retention of settlement identity and necessary supporting infrastructure.

In this case, we consider that land at NCGC is suitable for allocation as a residential site in the LPR, as it lies on the edge of the settlement of Newbury and is adjacent to an existing bus stop on an established bus route (Number 2 and 8 services). As such, the application site, the location of which and proposed site layout is provided within Appendix 1 to this document, is a suitable and sustainable setting for residential development, according to this policy.

Further, it is considered that the site should qualify for inclusion within the Newbury settlement boundary as part of the ongoing review set out in Appendix 2 of the LPR on the following grounds:

"Boundaries will include:

Single plots or other similar small scale development opportunities which would provide infill and rounding off opportunities that are physically, functionally and visually related to the existing built up area, taking account of any environmental development constraints".

Policy SP3 – Settlement Hierarchy is supported and request is made for the land identified for development at NCGC to be included within the revised settlement boundary of Newbury, particularly in light of the significant uplift and long-term retention of a Local Community Facility (Policy DM39) this would enable.



Policy SP7 – Design Principles

This policy states that new development will strengthen a sense of place through high quality locally distinctive design and place shaping. It will make places better for people, taking opportunities available for conserving and enhancing the character, appearance and quality of an area and the way it functions.

NCGC consists of 50 hectares (123 acres) of undulating land immediately to the east of the built-up area of Newbury, as delineated by Pigeons Farm Road. NCGC contains considerable areas of woodland and green infrastructure. A modest housing development of c.31 units on 2 hectares (5 acres) of land at the western edge of NCGC, which sits on relatively flat land, offers opportunity to make good use of this under-utilised space which does not form part of the playing area associated with golf course, to create a **verdant and attractive “landscape-led” scheme. Enabling the retention of NCGC through** delivery of a much-needed replacement clubhouse and will in turn conserve and enhance the existing landscape character and historic context of the site, which is the seventh oldest golf club in England, as well as its wider surroundings. The location on the edge of the countryside, adjacent to existing rights of way and overlooking land in leisure use will offer unique opportunities to improve access to the countryside and leisure facilities for new residents and existing ones. The health and well-being benefits of the proposal for the local population will be significant.

Policy SP7 – Design Principles is supported.

Policy SP8 – Landscape Character

This policy states that landscape-led development which conserves and enhances the biodiversity and local distinctiveness of the landscape character of the district will be supported. With regard to development proposals, particular regard will be given to: valued features and qualities; sensitivity and capacity of area to change and ensuring that new development is appropriate in terms of location, scale and design to the context of the existing settlement form, pattern and character.

The proposed residential site does not lie in a sensitive landscape location. The site is remote from the AONB to the north, while closer to the north-west is the racecourse and to the south is the former Greenham Common Air Base. As part of the residential application process, a LVIA has been undertaken which has demonstrated that the new buildings will not have a harmful impact on the existing settlement form, pattern and character. Appropriate landscape mitigation is also proposed, including native planting and significant biodiversity enhancement measures. The 50-hectare land holding



contains substantial areas of woodland, which helps to screen the residential site from long-distance views and the proposed residential development will therefore make little significant impact to the landscape setting of the settlement or the surrounding area; development may arguably improve the setting.

Furthermore, the proposed demolition and replacement of the clubhouse, which will be funded by the proposed housing development, is proposed as a wholly single-storey building, on previously developed land, which is subject to landscape planting to ensure that it blends into the landscape and does not lead to any harm arising either to the site or its surroundings, as demonstrated by the submissions made in support of the planning application. The new homes and clubhouse will provide significant economic, environmental and social benefits for the local community, whilst not harming the landscape character of the area and its surroundings.

Policy SP8 – Landscape Character is supported.

Policy SP10 – Green Infrastructure

This policy states that the council will maximise the potential for strengthening both local and strategic Green Infrastructure (GI) across the district. Development will protect and enhance existing GI assets and linkages and add to the local network for the benefit of both the natural environment and the health and wellbeing of the community.

NCGC is a land holding of 50 hectares (123 acres). Only 2 hectares (5 acres) are proposed for residential development in the south-west extremity of the land holding. There is considerable scope available to use parts of the remaining 48 hectares of land to plant new trees and other GI to enhance and protect the verdant character and appearance of the local area on the south-eastern edge of the settlement and this is demonstrated in the landscape proposals and the Biodiversity Net Gain report submitted in support of the proposals.

Allocation of land at NCGC will ensure that significant GI improvements will be provided as part of a landscape-led scheme. The availability of so much land in the same ownership and adjoining the proposed development will offer opportunities to make a net gain in GI, which will be to the benefit of the local community. Given the location of the GI on NCGC, which is managed by a team of green keepers, who are highly qualified in arboreal and ecological care, it will be possible to ensure that any new planting is maintained and properly managed over the long-term which will ensure that the GI improvements are there to be enjoyed by the local community for many decades to come.



Policy SP10 – Green Infrastructure is supported.

Policy SP11 – Biodiversity and Geodiversity

This policy states that development proposals will conserve and enhance biodiversity and/or geodiversity and will deliver net gain. Development proposals across the district will be expected to deliver 10% net gain for biodiversity either within the site boundary or as off-site compensation where appropriate.

On a land holding of 50 hectares, with only 2 acres proposed for residential development, there will be considerable scope for the provision of biodiversity net gain. This will be available not only for the 2 acres of residential development proposed by NCGC, but it could potentially be available for other smaller residential sites to utilise. To support the planning application package, a Biodiversity Net Gain assessment has been undertaken to establish the means to achieve a 10% on-site net gain. This has ensured that the proposal will make a positive contribution to bio and geodiversity in the local area to the benefit of the local community, both in visual and well-being terms. Such improvements, if consented, will ensure that NCGC contributes positively the bio and geodiversity of the locality for many decades to come.

Policy SP11 – Biodiversity and Geodiversity is supported.

Policy SP12 – Approach to Housing Delivery

This policy states that 8,721 to 9,146 net additional homes are required for the period 1 April 2022 to 31 March 2039, equating to 513 to 538 dwellings per annum. It is noted that the higher figure provided does not constitute a ceiling or cap to development. New homes will be located according to policies SP1, SP3 and DM1. It is important for the **council to ensure that the reference to the housing target figure not being a “ceiling or cap to development” is retained in the policy. This is because, this is a positive message** to send out, whilst there is a nationally recognised shortage of housing in the UK and any policy that seeks to facilitate additional housing provision at this time is to be encouraged.

The policy states that new housing will be focused in and adjoining the larger settlements, including the largest and most sustainable settlement of Newbury. Therefore, a development of 31 dwellings on land at NCGC, on the eastern edge of Newbury, will comply with policies SP1 and SP3, which will enable housing to be **provided to meet the council’s housing requirements, as set out in policy SP12. The** proposed dwellings will make a valuable contribution towards the housing needs of the district. The allocation of land on the edge of Newbury at NCGC will comply with this



policy, by helping to provide much needed new housing in a sustainable location, where the impacts of development can be satisfactorily mitigated.

Policy SP12 – Approach to Housing Delivery is supported. However, it is considered that the text should not be amended to remove reference to the delivery of housing over and above the "target figure" of 538 dwellings per annum.

Table 2 Housing Supply at 31 March 2022

Supply category	Net Units Outstanding
• Core Strategy: Sandleford Park Strategic Site	1,580
• HSA DPD Sites	990
• Stratfield Mortimer NDP Site	82
Subtotal	2,652
Local Plan allocations not being retained (due to site being at an advanced stage of construction)	
• Core Strategy: Newbury Racecourse	465
• HSA DPD Sites	256
Subtotal	721
Existing planning commitments on unallocated sites	1,958
Existing planning commitments for C2 Use Class communal accommodation	57
Windfall allowance to 2039	1,949
TOTAL	7,337

Paragraph 6.12 states that the requirement of 9,146 dwellings minus the supply of 7,337, means that sites for a further 1,809 homes need to be found. In addition, there needs to be some built-in flexibility to allow for phasing issues and to allow for non-delivery, particularly of larger sites, which need a great deal of up-front investment in roads and other infrastructure. Therefore, it is important to make it clear that the current shortfall of 1,809 dwellings should be a minimum and not a ceiling or a cap to development, as required by policy SP12 (see above).

It is likely that larger sites identified in the Local Plan will have some problems with delivery. It is unlikely that they will deliver the housing numbers predicted in the suggested timescales, because all larger sites encounter issues with such matters as site assembly, ownership and title issues, capital funding, infrastructure costs and delivery, planning permissions and legal undertakings, such as section 38, 106 and 278 agreements. Some larger sites, such as North East Thatcham, are also the subject of vehement objections from residents and scrutiny by Full Council and may not actually come forward in the numbers identified in the LPR during the period to 2039, particularly



as sales enquiries and corresponding build rates start to recognisably decline. Overall, it should be expected that the larger sites will not deliver the housing numbers needed in a timely fashion and there is a real need for more medium-sized and smaller sites, of less than 100 dwellings, to help to fill the gaps. Smaller sites can be delivered in short time frames, as they do not have the depth of issues that the larger sites have. Therefore, the council should allocate more smaller sites to ensure that housing needs are met in the short to medium-term.

Table 2 and Paragraph 6.12 – Housing Supply at March 2022 is supported. However, it is considered that it should be made very clear that the current shortfall of 1,809 dwellings is a minimum provision and not a ceiling or cap on development.

Policy SP13 – Sites allocated for residential and mixed-use development in Newbury and Thatcham

The policy lists a number of sites of varying sizes, which are proposed to be allocated for residential development. It is recognised, however, that the LPR demonstrates a considerable housing shortfall and whilst there is a sizeable contribution by windfall sites, of which the ongoing residential proposals could form part of the potential quantum, it is contended that further sites should be allocated to provide more certainty regarding where development is identified and the rationale underpinning this inclusion, particularly given the increase in the identified shortfall from 1,661 dwellings to 1,809 dwellings between the Reg.18 and Reg.19 versions of the LPR.

It is noted from review of the current LPR allocations that the Council is not averse to allocating land in the countryside or to amend settlement boundaries. It is also pertinent to highlight Full Councils concerns about delivery at the scale identified in respect of the NE Thatcham allocation. In this context, and irrespective of any changes to 5YHLS guidance, it is considered that allocation of the proposed residential land at NCGC is merited. The 2 hectares of land proposed for residential development is relatively flat with no long distance views. It is well-screened and fully enclosed by existing woodland, both around the development parcel and at site boundaries and a landscape-led scheme that will enhance and improve the visual amenity of the local area and provide 10% biodiversity net gain has been developed. Use of additional owned by NCGC to enhance the natural environment on the edge of Newbury and provide improvements to access and usability of surrounding public rights of way as part of the residential proposals, will lead to considerable improvements to the amenities, wellness and mental health of both existing and future local residents.



In its current form, it is therefore considered that Policy SP13 has not allocated sufficient sites to help meet the District-wide shortfall of 1,809 dwellings identified in the LPR. The allocation of residential development at NCGC would not only help towards more effective delivery against identified housing need, but would also support other policy aspirations of the LPR relating to support for the rural economy and local community facilities (in this regard, please see our additional comments against Policies DM35 and DM39, below).

Policy SP13 – Sites allocated for residential and mixed-use development in Newbury and Thatcham is Objected to, because it is considered that accommodation can be made for the proposed residential development at NCGC, which should be included in the list of larger sites (1ha or larger) for the allocation of c.31 dwellings.

Should the Council consider the representations made in support of allocation of land at NCGC for residential development to have merit, NCGC respectfully suggest the following policy wording:

Policy RSA XX – Land at Newbury and Crookham Golf Club, Greenham, Newbury (Site Ref: GRE10 and GRE11)

The site, as identified on the indicative map, has a developable area of 2 hectares and is proposed to be allocated for residential development comprising c. 31 dwellings, made up primarily of family-sized homes.

Development will be delivered in accordance with the following parameters:

- 1. The provision of c.31 dwellings will be developed at a mass and density that reflects the character of the adjoining settlement.*
- 2. The site will be developed in accordance with the Landscape Sensitivity Assessment (2011).*
- 3. The design and layout of the development will be further informed by a full detailed LVIA as required by Policy SP8.*
- 4. The scheme will provide significant Green Infrastructure improvements in accordance with Policy SP10.*
- 5. The scheme will include at least 10% bio and geodiversity net gain in accordance with Policy SP11.*



6. *The scheme will be supported by an extended phase 1 habitat survey, together with further detailed surveys arising from that as necessary.*
7. *The scheme will be informed by a FRA, which will advise on any necessary flooding and drainage mitigation measures.*
8. *A Transport Assessment will be required to establish the appropriate locations for access onto the wider road network and to ensure appropriate measures are put in place to mitigate impacts on the highway network.*
9. *As the proposal is to enable redevelopment of an existing Local Community Facility, a S106 agreement will be required to ensure that capital released by the development is only spent on the redevelopment of the NCGC clubhouse and other improvements to the golf course to improve its long-term viability.*
10. *A Viability Report will be required to identify the level of affordable housing capable of being supported by the enabling residential development.*

Policy DM35 – Sustaining a prosperous Rural Economy

NCGC is a rural 'not for profit' company, located beyond the settlement boundary of Newbury, but in an area adjacent to many homes and local residents who make use of its attractive open spaces to play golf and enjoy the countryside. The sport of golf is currently under a great deal of pressure. Overall, player numbers are on a long-term downward trend and balance sheets around the world have been hit hard by Covid-19 related closures. In this context, there have been two recent closures; the Racecourse and Donnington Valley, the latter of which has closed to members.

Whilst the Covid period provided a small boost in numbers to NCGC when golf provided that chance to enjoy sport in safety, the financial pressures have remained and change is required. There are several examples of other golf courses within the Council area or in adjacent Districts and Boroughs seeking to similarly plan for their future through discreet residential development and/or diversification of the leisure offer.

It is therefore important to plan proactively to ensure retention of sports and leisure facilities for the local community, especially ones that provide opportunities for exercise in the open air, which is good for fitness, health and mental well-being. NCGC is a leisure facility located in a rural area in a very accessible location. It is a business that supports 19 on-site, as well as a number of associated indirect jobs, which leads to overall investment of over £500k per annum in the local economy. NCGC also maintains 50 hectares of attractive countryside, which would otherwise suffer from lack of



stewardship. There are significant community, well-being and environmental benefits accruable from ensuring that the golf club is retained and encouraged to thrive into the future.

Policy DM 35 states that proposals for development relating to rural enterprises, such as NCGC, should demonstrate that they comply with a long list of criteria. As mentioned previously, NCGC proposes to demolish and replace its existing clubhouse and car park. The new clubhouse will have much-improved facilities for use by members and the general public. The enhanced facilities will create opportunities for greater training, work with schools and the local community. Significant landscape and biodiversity improvements will be possible because the golf club owns 50 hectares of rural land, which offers tremendous scope for investment in the local area. It will not just be a case of allocating 2 hectares of land and getting c.31 dwellings in return. The benefits of the allocation of the proposed enabling development will be substantial and will ensure that the community gains considerable tangible benefits from the scheme over many years.

The development proposals, which are supported by England Golf and Sport England, will help to attract new and varied membership, diversify income streams and ensure that the future of the golf club will be secure for decades to come. However, this will only be possible if an enabling development of c.31 dwellings on surplus land, which adjoins the existing settlement, is permitted in order to fund the redevelopment of the clubhouse and to provide capital to ensure the golf club is robust and can thrive into the future.

The policy as worded does not include any reference to enabling development or tacit support for leisure-based uses. Equally, the Council currently only recognises enabling **development in the context of the preservation of historic buildings. Whilst 'enabling development' is a concept set out in the NPPF in reference to funding the retention and repair of heritage assets, this has a wider scope beyond the protection of heritage assets as confirmed through legal judgements such as R (on the application of Thakeham Village Action Ltd) v Horsham District Council, 29 January 2014 where paragraphs 213 and 214 of that judgement state that:**

"I do not believe that the principles of enabling development are limited to ventures that would protect a heritage asset or a facility that serves or is accessible to the public. And I also reject the submission that those principles do not extend to a financial contribution that would support development undertaken by another company on another site.

The jurisprudence does not support either of those concepts. The scope for enabling development is wide. There are many ways in which it may serve a proper planning



*purpose. It may fund works of repair or improvement to a listed building. It may fund the protection of a particular habitat. It may fund the provision of a swimming pool for public use, or some other public facility. But that is far from being an exhaustive list of **the benefits it may help to provide.**"*

Accordingly, appropriate wording should be added to the policy to provide greater flexibility and allow for proactive assistance to be given to local community and leisure facilities that will otherwise fail, as follows:

xii. Enabling development will be permitted in circumstances where the capital generated will be used to improve the facilities of the rural enterprise, such that it can continue to provide economic, environmental and social benefits for the community in the long-term future. Planning permission will only be granted for enabling development schemes, if sufficient justification is provided to demonstrate that the level of capital generated is proportionate to the cost of providing the improved facilities, this being secured by S106

Policy DM 35 - Supporting the Rural Economy is objected to in its present form. The policy needs to be amended to include the above additional criterion, which will allow for a wider and more appropriate definition of enabling development, which in turn will help to maintain rural enterprises, like NCGC, into the foreseeable future.

Policy DM39 – Local Community Facilities

NCGC is a leisure-based business, located adjacent to many homes and local residents in the Newbury Area who make use of its attractive open spaces to play golf and visit the facilities. The sport of golf is currently under a great deal of pressure. Player numbers are on a long-term downward trend and balance sheets around the world have been hit hard by Covid-19 related closures. Against this, it is important for the local community to have access to sports and recreation facilities, especially ones that provide opportunities for exercise in the open air, which is good for fitness, health and mental well-being. In this regard, it is noted that in supporting text to Policy DM39, paragraph 12.62 identifies **'Areas or places for community outdoor sport or recreation'** within the definition of local community facilities.

NCGC is a leisure facility located in a highly accessible location. It is a business that supports 19 FTE jobs and it maintains c.50 hectares of attractive and maintained land, which would otherwise suffer from lack of stewardship. There are significant community, well-being and environmental benefits accruable from ensuring that the golf club is retained and encouraged to thrive into the future.



Policy DM39 provides support for new and expanded provision of local community facilities, subject to meeting a number of criteria relating to need, accessibility, design, engagement and use of spaces. The proposals at NCGC have been subject to lengthy and meaningful engagement and consideration to identify how to best respond to changing needs and demands in the golf industry and to deliver on inclusivity and diversity ambitions and these are manifest in the planning applications submitted to the Council for its consideration.

The new clubhouse will have much improved facilities for use by members and the general public. The enhanced facilities will create opportunities for greater training, work with schools and the local community. Significant landscape and biodiversity improvements have been suggested through the planning applications, as have improved access and extensions to public rights of way around the golf course. The golf club ownership of c.50 hectares of rural land offers tremendous scope for investment in the local area. It will not just be a case of allocating c. 2 hectares of land and getting c.31 dwellings in return. The benefits of the allocation of the proposed enabling development will be substantial and will ensure that the community gains considerable tangible benefits from the scheme over many years.

A scheme of c.31 dwellings is currently proposed, which has been subject to significant due diligence at pre-application stage and identified as a quantum that could provide the quantum of enabling development desired, whilst also ensuring that the minimum level of development required is progressed. Retention of long-term golf at NCGC is the scheme driver and the residential development is being progressed solely to fund this. A detailed Business Case has been submitted to the Council to set out issues and options leading to the development decisions made, these being subject to robust Viability Review.

The improvements to the clubhouse and course will help to attract new and varied membership, diversify income streams and ensure that the future of the golf club will be secure for decades to come. However, this will only be possible in these testing times, if an enabling development of c.31 dwellings on surplus land, which adjoins the existing settlement, is permitted in order to fund the redevelopment of the clubhouse and to provide capital to ensure the golf club is robust and can thrive into the future.

Taking this into account, it is considered that Policy DM39 should provide a mechanism to enable the funding of new and expanded community facility provision. The case for supporting enabling development and the breadth of uses that this can be tailored to is set out in our response to Policy DM35, but for completeness in respect of this separate policy is reiterated below.



Whilst '**enabling development**' is a concept set out in the 2021 NPPF in reference to funding the retention and repair of heritage assets, this has a wider scope beyond the protection of heritage assets as confirmed through legal judgements such as R (on the application of Thakeham Village Action Ltd) v Horsham District Council, 29 January 2014 where paragraphs 213 and 214 of that judgement state that:

"I do not believe that the principles of enabling development are limited to ventures that would protect a heritage asset or a facility that serves or is accessible to the public. And I also reject the submission that those principles do not extend to a financial contribution that would support development undertaken by another company on another site.

The jurisprudence does not support either of those concepts. The scope for enabling development is wide. There are many ways in which it may serve a proper planning purpose. It may fund works of repair or improvement to a listed building. It may fund the protection of a particular habitat. It may fund the provision of a swimming pool for public use, or some other public facility. But that is far from being an exhaustive list of the benefits it may help to provide."

Accordingly, appropriate wording should be added to the policy to provide greater flexibility and allow for proactive assistance to be given to local community facilities that will otherwise fail, as follows:

"Enabling development will be permitted in circumstances where the capital generated will be used to underpin the improvement the Local Community Facilities, such that it can continue to provide economic, environmental and social benefits for the community in the long-term future. Planning permission will only be granted for enabling development schemes, if sufficient justification is provided to demonstrate that the investment is necessary and that the level of capital generated is proportionate to the cost of providing the improved facilities, this being secured by S106".



I trust that the above comments and suggestions can be given due consideration in the evolution of the local plan. If you have any queries regarding these representations, please do not hesitate to contact me.

Yours faithfully,

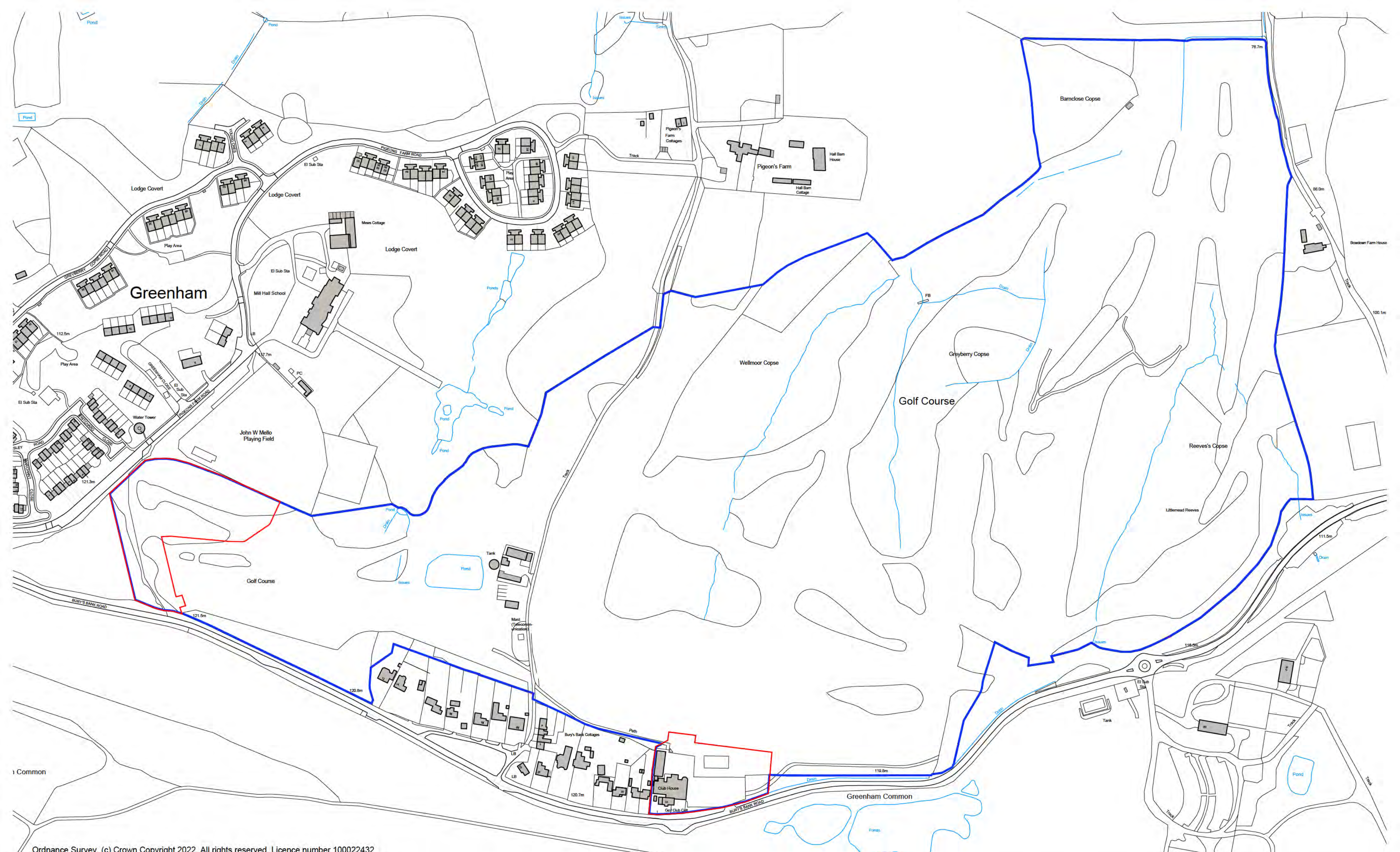


Jonathan Walton

Planning and Development Director



Appendix 1: Proposed Enabling Development, Site Location and Current
Proposed Layout

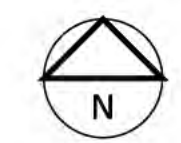


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Rev	Comments	Date	Dr	Ch
P1	First Issue	26/05/2022	AM	PP

- Application Boundary
- Ownership Boundary

PWA Code: 16001
 Notes: Use annotated dimensions only. All dimensions in millimeters unless otherwise stated. This drawing is to be read in conjunction with all other related material. Any discrepancies, conflicts or errors must be reported to Piper Whitlock Architecture before commencing work.



Drawing Title:
Site Location Plan

Project Name:
Newbury & Cookham Golf Club, Newbury

Client: **Newbury & Crookham Golf Club Ltd & Chartfield Home (NCGC) Ltd**



Project Ref: **NCGC -PWA-00 -00-DR-A-0553-P1**

Status: **FOR INFORMATION** Stage: **3** Scale @ A2: **1:2500**

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Out of Bounds


BURY'S BANK ROAD

Rev	Comments	Date	Dr	Ch
G1	Planning Issue	06/05/2022	SP	PP
G2	Existing Homes & changing room layout updated	12/09/2022	SP	PP

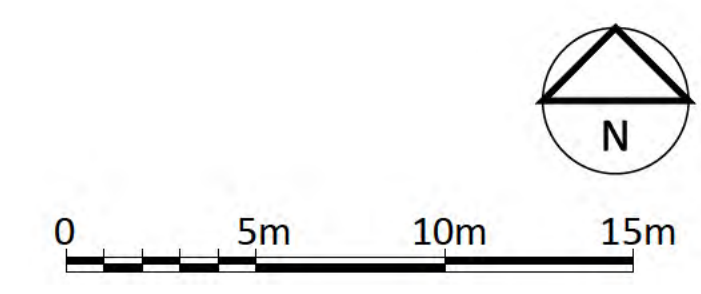
PWA Code: 16001
 Notes: Use annotated dimensions only. All dimensions in millimeters unless otherwise stated. This drawing is to be read in conjunction with all other related material. Any discrepancies, conflicts or errors must be reported to Piper Whitlock Architecture before commencing work.

Note - Scheme set in context of proposed course layout changes Ordnance Survey, (c) Crown Copyright 2022. All rights reserved. Licence number 100022432

Drawing Title: Proposed Clubhouse Site Plan		Project Name: Newbury & Crookham Golf Club Newbury	
Client: Newbury & Crookham Golf Club Ltd & Chartfield Home (NCGC) Ltd			
Project Ref: NCGC -PWA-00 -00	Orig: -PWA-00 -00	Zones: -DR-A-0010-G2	Rev: 3
Status: PLANNING	Stage: 3	Scale @ A1: 1:200	Role: PP



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121.3m

North West & North East boundary's indicated are subject to confirmation due to discrepancies between OS & Survey - Exact boundary TBC

For landscape between residential development and golf course, see Ecosa Biodiversity Net Gain Planting Plan

Pumping station
Sub-station

BURY'S BANK ROAD

Footpath Realigned

Forward Visibility Space

Rev	Comments	Date	Dr	Ch
G1	Planning Issue	11/04/2022	SP	PP
G2	Visitor Parking Indicated	04/10/2022	SP	PP

PWA Code: 20010
 Notes: Use annotated dimensions only. All dimensions in millimeters unless otherwise stated. This drawing is to be read in conjunction with all other related material. Any discrepancies, omissions or errors must be reported to Piper Whitlock Architecture before commencing work.

Drawing Title:
Proposed Site Plan

Project Name:
NCGC 14/15 Hole, Residential, Newbury

Client: **Newbury & Crookham Golf Club Ltd & Chartfield Homes (NCGC) Ltd**
 Project Ref: **NCGCR -PWA-00 -00 -DR- A -0011 - G2**
 Status: **PLANNING**
 Stage: **3** Scale @ **A2**

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