


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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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	Mrs
First Name:*	Phil	Rebecca
Last Name:*	Simmons	Humble
Job title (where relevant):	Land Manager	Associate
Organisation (where relevant):	Donnington New Homes	Pegasus Group
Address* <i>Please include postcode:</i>	Warren Rd, Newbury RG14 6NH	3 West Links Tollgate Chandlers Ford SO53 3TG
Email address:*	[REDACTED]	[REDACTED]
Telephone number:	[REDACTED]	[REDACTED]

*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):	Rebecca Humble, Pegasus Group on behalf of Donnington New Homes
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	See attachment
Policy:	See attachment
Appendix:	See attachment
Policies Map:	See attachment
Other:	See attachment

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:

See attachment

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:

See attachment

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

X

Please give reasons for your answer:

See attachment

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.

See attachment

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 make the relevant points before the Inspector and provide answers to any queries arising.

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

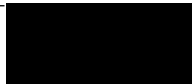
Do you wish to be notified of any of the following?

Please tick all that apply:

Tick

The submission of the Local Plan Review for Independent Examination	Yes
The publication of the report of the Inspector appointed to carry out the examination	Yes
The adoption of the Local Plan Review	Yes

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	02.03.2023
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Your completed representations must be received by the Council by 4:30pm on Friday 3 March 2023.

P20-2795 Sandleford Park South

2nd March 2023

[REDACTED]
Planning and Transport Policy Manager
West Berkshire Council
Council Offices
Market Street
Newbury
RG14 5LD

Dear [REDACTED]

**Ref: West Berkshire Local Plan Review 2022-2039 – Regulation 19: Proposed Submission
Sandleford Park South including the delivery of the Wash Common Relief Road**

On behalf of our Client, Donnington New Homes (DNH), I write in response to the Council's current consultation on the emerging West Berkshire Local Plan Review 2022-2039.

As the Council will be aware our Client controls land south of the existing Core Strategy allocation at Sandleford Park (Policy CS3). These representations follow the previous submissions made by our Client in 2013 (for inclusion in the Strategic Housing Land Availability Assessment (SHLAA)); in 2017 in response to the Council's Call for Sites (HELAA); in 2018 in response to the Council's Local Plan Scoping Report and Sustainability Appraisal; later in 2018 in response to the Regulation 18 West Berkshire Local Plan Review to 2036; in November 2020 as an update to our original HELAA Call for Sites submission, and in February 2021 in response to the consultation carried out by the Council on its Regulation 18 Local Plan Review.

Housing Need and Supply

3 West Links, Tollgate, Chandlers Ford, Eastleigh, Hampshire, SO53 3TG
T 023 8254 2777 E Solent@pegasusgroup.co.uk
Offices throughout the UK

Pegasus Group is a trading name of Pegasus Planning Group Limited (07277000) registered in England and Wales
Registered Office: Pegasus House, Querns Business Centre, Whitworth Road, Cirencester, Gloucestershire GL7 1RT

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arrangements in the proposed revised Annex to the NPPF make it clear that the dWBLP will be assessed against the test of soundness as outlined in paragraph 35 of the NPPF published in July 2021. In other matters, until the proposed revisions to the NPPF are made, the dWBLP should proceed on the basis of existing national policy and guidance.

Strategic Objective 2 of the Proposed Submission Plan is: -:

“To provide a range of sites to ensure that the District's housing needs and aspirations are met by providing a range of market, affordable and specialist housing types, tenures and sizes in appropriate and sustainable locations.”

Policy S12 of the dWBLP sets out the minimum housing requirement for the Council as 513 dwellings per annum (dpa) for the for the period 1 April 2022 to 31 March 2039; resulting in a total requirement of 8,721 dwellings. The figure of 513 dpa is calculated using the Government's Standard Methodology (SM) as set out in the NPPF and the accompanying Planning Practice Guidance. The figure of 513 dpa corresponds with that calculated by Pegasus Group in accordance with the SM and latest available data. The Planning Practice Guidance (PPG)¹ explains that the SM should be considered as a starting point and that the level of need should be informed by local conditions:

“ The government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. It does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour. Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.”

It goes onto outline circumstances where this may be appropriate:

.... include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

- *growth strategies for the area that are likely to be deliverable, for example where funding is in place to promote and facilitate additional growth (e.g. Housing Deals);*
- *strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or*

¹ Paragraph: O10 Reference ID: 2a-O10-20190220



- *an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground;*

The West Berkshire Housing Needs Assessment Update (WBHNAU) prepared by Icen Projects Limited on behalf of West Berkshire Council in July 2022 concluded that there are at present no reasons to increase housing supply above that calculated using the Standard Method.

Housing Requirement Buffer

Policy S12 of the dWBLP expresses the housing requirement as a range, with an additional 5% above the LHN (rounded to 538 per annum) made to be in accordance with the Government's objective of significantly boosting the supply of homes as set out in the NPPF. Paragraph 6.10 of the dWBLP states that:

"The allocation of sites in the LPR aims to meet delivery of a higher number of homes in order to both boost supply and have some built-in flexibility. The upper end of the range is a target but should not be considered a maximum amount. It is not intended to be a cap on development that would otherwise be acceptable."

The inclusion of such a buffer helps to ensure that the LHN as a minimum is delivered within the Plan period. The inclusion of a buffer is supported in principle by Donnington New Homes. However, concern is raised as to the extent of the buffer planned for in the dWBLP. Although there is no national guidance regarding the extent of any buffer, it is common practice in local plans to have at least a 10% buffer to ensure the minimum housing requirement is met, should the sources identified in the Plan not come forward as expected.

The approach to housing delivery was assessed through the Sustainability Appraisal (SA) as part of the Plan making process and published alongside the dWBLP. As well as ensuring the Plan meets the NPPF's objective of boosting the supply of housing, the SA recognises the need for some flexibility above the LHN figure to take account any changes to the LHN and allow for phasing issues and an element of non-delivery of sites.

Two reasonable alternatives were considered in the SA, namely meeting the Local Housing Need (LHN) figure and LHN plus a buffer. The two reasonable alternatives were then subject to SA/SEA.



The Regulation 18 consultation considered a buffer of 10% to help to boost supply and provide Flexibility. However, in response to the comments made as part of the Regulation 18 consultation a buffer of 5% was also considered for the production of the Regulation 19 dWBLP. This lower buffer was considered on the basis that “it would also provide a degree of flexibility helping to provide flexibility and a boost to the supply, while taking into account the constraints seen across the district”. These two options, along with the baseline LHN were then subject to SA/SEA.

All three options were assessed as having an overall positive effect against the SA objectives. However the LHN+10% buffer was assessed as having ‘an overall positive effect with some significantly positive effects’. In particular, the LHN+10% buffer option would significantly help to support the economy.

The SA concluded that all three options would have a negative effect on two of the SA objectives:

- 5: Ensure that the character and distinctiveness of the natural, built and historic environment is conserved and enhanced, and
- 6: To protect and improve air, water and soil quality, and minimise noise levels throughout West Berkshire

However, in relation to the above objectives it was noted that with mitigation the impact should be neutral for all three options. It is therefore, surprising that the Council progressed on the basis of

the lower buffer option of +5% for determining the housing requirement when there were no additional negative effects from the option of using the LHN+10% buffer, and indeed the higher figure would provide some additional significant positive benefits.

Unmet Needs of Reading

Paragraph 11b of the NPPF specifies that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.



The Reading Local Plan was adopted in November 2019 and includes a housing need of 16,077 homes (699 pa) for the period 2013–36, of which 230 (unmet need) are to be provided elsewhere in the Housing Market Area.

The Duty to Co-operate was introduced by section 33A of the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011. It places a legal duty on local planning authorities, county councils and prescribed public bodies to work together on strategic cross boundary matters. The Localism Act states that the 'duty' requires that engagement should occur constructively, actively and on an ongoing basis during the plan making process and that regard must be given to the activities of other authorities where these are relevant to the local planning authority in question.

Two of the four tests of soundness of local plans (NPPF Paragraph 35) directly relate to the Duty to Co-operate: Plans must be:

- *Positively prepared* – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.
- *Effective* – 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.

Planning Practice Guidance (PPG) at Section 61, paragraphs 09–28, includes specific guidance on the production, scope, and content of Statements of Common Ground. West Berkshire Council published a Duty to Co-operative Statement in January 2023. It refers to and includes a Statement of Common Ground (WBCSoCG) published in August 2021, and signed by representatives of Bracknell Forest, Reading, West Berkshire and Wokingham Councils.

The WBCSoCG refers to A Memorandum of Understanding that was originally signed by these four



Berkshire authorities in October 2017. This recognised the level of unmet need and agreed that the West of Berkshire area should meet its housing needs in full. This was replaced by a revised Memorandum of Understanding signed in August 2021. The Western Berkshire authorities have agreed through the Memorandum of Understanding that Reading's existing unmet need of 230 dwellings (based on the current development plan) is a collective responsibility and will be met within the HMA through flexibility included in emerging plans. It goes on to say that no authority is required to increase the minimum housing requirement or identify specific sites. However, this agreement relates only to Reading's need as calculated by the SHMA, not by any alternative calculations of need, which will need to be subject to separate discussions.

The Memorandum of Understanding states the identified 230 dwellings unmet need is likely to affect the planned level of housing provision in the latter part of the plan period, from 2026 to 2036, and will not therefore need to be accommodated in the short term. There is no specific identification of site(s) to meet the identified 230 dwellings of the unmet need of Reading, nor inclusion within the housing requirement of any adjacent authority. Policy SP12 of the dWBLP therefore does not include any provision for meeting the unmet needs of Reading.

Paragraph 6.7 of the dWBLP addresses the needs of Reading as calculated using the SM:

“Reading has identified that a five yearly review is required by 2024 and that will need to consider how to deal with the housing needs generated by the standard methodology. Though the principle of meeting any unmet need within the Western Berkshire Housing Market Area (HMA) is accepted, the distribution of that unmet need within the HMA has not been agreed and will be subject to further review, through the plan-making process, before the need arises”.



A review of the Reading Local Plan should take place by November 2024. The Reading Local Development Scheme (LDS) has not been updated from that published in November 2016 and there is no indication of a timetable to review the Local Plan. Given the lack of progress since the adoption of the Reading Local Plan in 2019 the prospect of a new Plan being adopted by November 2024 is extremely unlikely. Furthermore, housing delivery within Reading has fallen below the expected amount. Between 2013 and 2022 a total of 5,853 dwellings were completed in Reading Borough as compared to the annualised total of 6,201 representing a shortfall of 348 homes.

Reading is identified as a 35% uplift urban local authority in the 2020 revised Standard Methodology for Housing Need. The current figure for Reading based on the Standard Methodology is 907 dpa; an increase of 32% on the adopted Local Plan figure. If this is applied to the remainder of the Plan period 2022 to 2036, the need increases by 3,052 above the Adopted Plan figure.

The approach of the Western Berkshire authorities is to challenge the extent of the housing needs of Reading and to delay any resolution to meeting that need for as long as possible.

As an unmet need was identified in the 2036 Reading Local Plan, it is highly likely that a continued unmet need will be identified for the subsequent Review of the Reading Local Plan, particularly given the higher local housing need figure outlined above. Once established in the Revised Reading Local Plan, the adjacent authorities will need to accommodate this need in their own local plan reviews. In the case of West Berkshire this will not be until 2028 at the earliest and more realistically 2030 at best. In total therefore a period of 8 years will have elapsed since the housing need was established before it is effectively met. The total shortfall would be 1,557 homes over that period.

The West of Berkshire Authorities should be planning now to meet the future unmet needs of Reading Borough, including a realistic assessment of the proportion that can be met within West Berkshire, rather than deferring this contrary to the requirements of paragraph 35c of the NPPF. The dWBLP should be flexible enough to accommodate, at least in part, some of that unmet need.

Affordable Housing Needs

Planning Practice Guidance paragraph 2a-024 states:



“... An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.”

The West Berkshire Housing Needs Assessment Update (WBHNAU) shows a net annual need for 330 rented affordable homes and a net annual need for 367 affordable home ownership homes in the District. Therefore, the total affordable housing need of 697 homes per annum is in excess (130%) of the total housing provision proposed in the dWBLP.

Despite the level of need being high, the WBHNAU considers that this would not necessarily point to any requirement for the Council to increase the Local Plan Review housing requirement above that suggested by the SM.

“The link between affordable need and overall need (of all tenures) is complex and in trying to make a link it must be remembered that many of those picked up as having an affordable need are already in housing (and therefore do not generate a net additional need for a home)”.

The WBHNAU considers that the affordable housing need arising from newly forming households is already accounted for in the output from the demographic modelling (i.e. the Standard Method), and are therefore already included in the overall housing need figures.

Whilst it is accepted that the relationship between affordable housing need and overall housing need is complex and that there is no simple arithmetical means of linking the two, the PPG is clear that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes. Furthermore paragraph 20 of the NPPF is clear that strategic policies should make sufficient provision for affordable housing.

The WBHNAU erroneously conflates the overall housing needs of the area with that of the need for affordable housing. Whilst it is true that a proportion of households in need of affordable housing are already accounted for in the demographic modelling of the SM and therefore it is not necessary to deliver more homes than suggested by the SM, this misses the fact that the WBHNAU identifies that there is a greater need for affordable homes than there are for all homes according to the standard method. Accordingly, even if all of the homes proposed were delivered as affordable



homes there would still be a shortfall. It also misses the fact that a proportion of the housing delivered will not be affordable homes and so will not respond to the needs identified and that accordingly, it will be necessary to provide for an even greater number of homes to meet the need for affordable housing as set out in the Planning Practice Guidance.

Donnington New Homes acknowledges that the Council may not be able to meet the affordable housing needs in full. However, the disparity between what is needed and what is planned to be delivered indicates a clear need for an uplift in the overall housing requirement to ensure a sufficient provision of affordable housing in accordance with paragraph 20 of the NPPF.

The Council acknowledges the upper target of the housing provision does not constitute a ceiling or cap to development (draft Policy SP12). An uplift in the housing provision for affordable housing needs would therefore not be at odds with the development strategy of the Council.

Housing Delivery

The Council's Five Year Housing Land Supply Statement (November, 2022) claims a 6.4 year supply against the LHN figure of 513 dpa for the 5 year period commencing at April 2022. It should be noted that none of the proposed new allocations in the dWBLP are forecast by the Council to commence before April 2027. However, as the Plan is unlikely to be adopted before April 2024 it is necessary to assess the likely five year housing land supply at that point.

The housing trajectory presented in the Housing Background Paper shows there will be a nominal shortfall of 434 dwellings against the housing requirement of 538 + 5% buffer² for the period 2024 to 2029 before any oversupply in the first two years³ of the Plan period are taken into account, resulting in a 4.23 year supply. Should the oversupply be accounted for across the remaining plan period⁴ the shortfall would reduce to 61 and result in a 4.89 year supply. However, if the shortfall is

² As per paragraph 74 of the NPPF

³ 'Oversupply' 2020-22 = 1,177

⁴ The inverse 'Liverpool' method



accounted for in the first five years of the plan following its adoption⁵ there would be a surplus of 684 dwellings and a 5 year supply of 6.21 years.

Whilst it currently falls to a matter of planning judgement as to which of these three approaches should be used, it is clearly open to a decision-maker to conclude that at the point of adoption the Council will be unable to demonstrate a five-year land supply. Therefore, additional sites capable of delivering early in the plan period would ensure that a five year land supply will be able to be demonstrated on any basis.

Housing Needs and Supply Conclusions

The above analysis highlights shortcomings in respect of housing provision in the dWBLP as follows:-

- a) an insufficient buffer to allow for flexibility and ensure the LHN is met in full over the Plan period,
- b) a higher housing requirement by increasing the buffer can be made with no additional negative affects against the Sustainability Appraisal objectives, and indeed would provide additional positive benefits,
- c) the current unmet needs of Reading are not adequately provided for,
- d) the likely future unmet needs of Reading should be planned for now, and the dWBLP should include flexibility to allow for the provision of that need as part of the Duty to Co-operate,
- e) there is a clear case for an uplift to the housing provision to account for the identified affordable housing needs of the area, and
- f) a potential shortfall in the five year housing land supply from the intended date of adoption of the plan if the oversupply is not accounted for in the five years following adoption

⁵ The inverse 'Sedgefield' method



WBC Evidence Base

Turning now to the Evidence Base on which the Council has based its assessment. In January, 2023, the Council updated its HELAA to reflect a number of additional sites put forwards along with corrections made in response to the previous consultation (including reference to my client's part of site as '*NEW8: Sandleford Park South*'). In line with previous versions of the HELAA, the 2023 update assesses each site at Appendix 4. In relation to '*Local Plan History*', the assessment of my client's site states the site was;

'.....ruled out for allocation because the site is close to the strategic site allocation of Sandleford, and it was considered that this part of Newbury should not have further development of this scale in the short to medium term.'

The Council's method for not considering Sandleford Park South for allocation is flawed in that considering an area '*should not have further development*' does not accord with the requirements set out in the NPPG in relation to Plan Making. Para 038 states that '*Policies need to be justified*' and goes on to state that, '*evidence needs to inform what is in the plan*'. Simply considering that an area should '*not have further development*' is not a justified approach to plan making and is not based on evidence. The evidence presented in our previous representations (including Appendix A) relating to Sandleford Park South shows that the site is **SUITABLE** for development, **AVAILABLE**, and **ACHIEVABLE**.

In relation to evidence, para 038 of NPPG states that '*evidence needs to inform what is in the plan.....rather than being collected retrospectively*'. It is therefore, interesting that the Council only updated its HELAA in January 2023, which is the same month it published its current Regulation 19 Consultation Plan – it would seem this would have allowed little time for the Council to properly consider the updates to the HELAA in order that they be given thorough consideration within the current consultation Plan and reflect the requirements of the NPPG that evidence should inform the Plan.

The Council's other key concern relating to the site relates to impact on distant views of the landscape stating that development of the site, '*would not respect the role the landscape plays as*



a setting to the character of Newbury'. As demonstrated by the Landscape Appraisal commissioned by our client and submitted as an Appendix to our February 2021 representations (and included here at Appendix A), the Council's conclusions on this matter are incorrect. The Landscape Appraisal clarifies that (absence of) impact, as follows:

Visual Amenity – *"the site benefits from a significant degree of visual containment such that development as proposed with the masterplan would not have a significant visual effect upon the surrounding settlements or countryside".... "By introducing a substantial tree belt running along the southern boundary of the western half of the site on the steeper slopes and adjacent to the River Enborne watercourse, such a linear tree belt would provide substantial screening for residential properties on the lower slopes of the site. With a spine road running through the site orientated east-west linking the Andover Road with the residential allocation to the north, this would provide the opportunity to introduce substantial tree cover along this highway corridor."*

Landscape Character – *"the site and its immediate environs form a heavily wooded landscape and that as far as the site is concerned, it physically and visually relates to the River Enborne Valley, a shallow narrow valley which is broadly orientated east-west linking Newtown and Newtown Common to the east with Enborne Row to the west. Beyond the boundary of the settlement itself, there is a sense of rurality and this is achieved because there is little by way of visual connection with the adjacent settlements and in particular, Newbury and Wash Common to the north"....";*

" There is a wooded character to the landscape, and this is also evident on the site";

" The proposed masterplan envisages a number of neighbourhood areas which are set within the retained vegetation and in particular tree cover that frames and subdivides the site. As a consequence, the residential neighbourhoods would have a strong sylvan backdrop and character to them which reflects the general character of the immediate locality. The proposed development would therefore be in keeping with the character and appearance of the local existing residential neighbourhoods".



Potential Development Framework Strategy – *"In terms of visual amenity, the eastern half of the site is extremely well contained in visual terms given the topography and configuration of tree cover and woodland framing the site. Whilst the western half of the site is more visible from some public footpaths on the southern side of the valley, by introducing a tree belt along the southern boundary of the site adjacent to the Enborne River as a riparian wooded landscape, together with a strong boulevard feature defining the spine road which traverses the mid slope, both these features would effectively visually frame residential neighbourhoods on the upper and lower slopes within the western half of the site".*

Concluding Remarks – *"A residential development within this site accommodating the field and vegetation pattern would ensure that the proposal would reflect the grain of the landscape and in so doing would be in keeping with the character and appearance of other residential neighbourhoods in the local landscape and townscape. This would ensure that the residential scheme would be successfully integrated into the existing landscape framework of the site and its surrounding area."*

As detailed in the submission made in February 2021 (Appendix A) which set out our client's views in relation to the Council's conclusions on the suitability of the site, we remain of the same views which, in summary, are that the Council has inaccurately categorised the site in relation to its **SUITABILITY** for development. The Council concluded that the site would be *'inappropriate in the context of settlement form, pattern and character of the landscape'* and included references to *'Local Wildlife Sites within the site'*.

Of most importance, is that this conclusion significantly overlooks the range of benefits that could be delivered in association with the site including new publicly accessible open space, including a riverside walk, a range of new homes including affordable provision, potential for landscape enhancements within and around parcels of development designed to *'integrate into the landscape'* (WBC HELAA 2023, Appendix 4). In addition, and of key importance, however, is the delivery of the **Wash Common Relief Road**.



It is well documented that the delivery of a **Wash Common Relief Road** has been a long-standing local aspiration as evidenced by its reference within the Newbury Town Plan 2019-2036 (Adopted June 2018) which states, on page 37:

*“The foregoing [a new road from the Swan roundabout to the A34 along the River Enborne] would link in with a specific proposal by the Town Council on the vehicle access to Sandleford. In common with local residents, we do not support Warren Road as the principal western access, because of interference with the considerable local traffic to schools and shops, and Andover Road’s role as a principal gateway into the town. We need to make provision for the large proportion of cars from Sandleford which will wish to join the A34. **Our recommended solution is a new road from the western Sandleford development east and south of Garden Close Lane, joining the A343 at Wash Water.** The Town Council’s position is that this is the only feasible solution for a western access to Sandleford.”*

This is reiterated at para 8.11.4 on page 41, where proposals to create additional road capacity in the Town are outlined: *“A new road from the planned western Sandleford development east and south of Garden Close Lane, joining the A343 at Wash Water, to provide a direct access for Sandleford residents to the A34.”*

This aspiration is reflected in WBDC’s own conclusions on the suitability of Sandleford Park South to deliver an additional access to Sandleford Park whereby, in relation to Highway and Access matters, Appendix 4 of the January 2023 HELAA states;

*‘Vehicular access for this site and the adjoining sites would be obtained via the A343 Andover Road ...connecting into Sandleford (Park). **This is very important** as it allows traffic to not only spread from these three sites, but will also provide access to for Sandleford that will reduce traffic on Andover Road to the north’.*

It is therefore clear that plan makers – both within West Berkshire District Council and within Newbury Town Council – consider the benefits associated with an allocation at Sandleford Park South as being highly significant in delivering the long-held aspiration of a Wash Common Relief



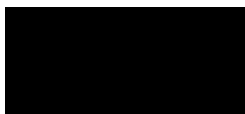
Road. As set out in previous representations relating to this site, and reiterated above, the site can deliver this benefit together with a series of other local benefits (including affordable housing, public open space and a riverside walk), without causing any harm to the landscape setting of the local area. Accordingly, is entirely appropriate for development and should be allocated within the emerging Plan.

Relationship with adjoining land

Land to the west of the my clients site is currently controlled by Gladman developments. That area of land provides connectivity to the A343 (Andover Road) which would allow for the consolidated delivery of the Wash Common Relief Road. My client is advised by Gladman that they will make their own representations under separate cover in relation to their land and that matter. My client remains committed to working collaboratively with Gladman, as appropriate, in relation to this matter and all other cross site matters.

On behalf of my client, Donnington New Homes, I look forward to the Council's acknowledgement of its receipt of these representations to the Emerging Local Plan, and I look forward to receiving notification of the next steps in the Local plan process in due course.

Yours sincerely



Rebecca Humble

Associate Planner



Enc.
Appendix A – February 2021 Representation

P20-2795 Sandleford Park South

5 February 2021

██████████
Planning and Transport Policy Manager
West Berkshire Council
Council Offices
Market Street
Newbury
RG14 5LD

Dear ██████████

Ref: West Berkshire Local Plan Review 2020 - 2037

Sandleford Park South including delivery of the Wash Common Relief Road

On behalf of our Clients, Donnington New Homes and Gladman Developments Ltd, I write in response to the Council's current consultation on the emerging West Berkshire Local Plan Review 2020-2037.

As the Council will be aware our Clients control land south of the existing Core Strategy allocation at Sandleford Park (Policy CS3). These representations follow the previous submissions by our Clients in 2013 (for inclusion in the Strategic Housing Land Availability Assessment (SHLAA)); in 2017 in response to the Council's Call for Sites (HELAA); in 2018 in response to the Council's Local Plan Scoping Report and Sustainability Appraisal; later in 2018 in response to the Regulation 18 West Berkshire Local Plan Review to 2036; and in November 2020 as an update to our original HELAA Call for Sites submission.

The earlier previous submissions referred to the site as the Sandleford Park Extension (SPE). Given that Sandleford Park (as allocated by Policy CS3) now comprises Sandleford Park West (SPW), controlled by Donnington New Homes and Sandleford Park (also known as SP) controlled by Bloor Homes, it is considered that the use of the acronym "SPE" could be assumed to mean 'Sandleford Park East', which is not the case. Indeed, the Council's current HELAA erroneously refers to the site as HELAA Ref. NEW8, "Sandleford Park East".

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The revised name, **Sandleford Park South (SPS)**, was used for the purposes of the 2018 response to the Local Plan Scoping Report and Sustainability Appraisal, and again during the Regulation 18 consultation response later in 2018; and this name has been carried forwards to this current consultation response. The HELAA should be corrected accordingly please to refer to the NEW8 site as Sandleford Park South.

As the Council will be aware, a detailed submission was made in November 2017 in response to the Council's open 'Call for Sites' for land to be considered in the HELAA, and this was most recently updated by our submission in November, 2020. That submission provided a detailed description of the site, its characteristics and history in relation to previous iterations of the HELAA. Within those iterations of the HELAA, Council Officers have previously been reluctant to identify the land as being appropriate for development on landscape grounds. Appendix 4 to the current HELAA, "Site Assessments", considers the site's "Suitability" at Stage 2b as follows:

"WOULD DEVELOPMENT BE APPROPRIATE IN THE CONTEXT OF THE EXISTING SETTLEMENT FORM, PATTERN AND CHARACTER OF THE LANDSCAPE?"

West Berkshire Landscape Character Assessment (2019): the site lies within the Greenham Woodland and Heathland Mosaic LCA (WH2). It notes that the Newbury settlement boundary has extended into this area to take account of allocated development, particularly at Sandleford Park, and there is continued pressure for further development south of Newbury. The LCA identifies this as a key detractor.

The landscape strategy for this area is therefore to ensure new development integrates into the landscape. The distinction between individual settlements and the role of the landscape as a setting to the character of those individual settlements should be respected. The site forms part of the sloping valley side and contributes positively to the setting of Newbury. Development in this location would extend development down the valley side and would not respect the role the landscape plays as a setting to the character of Newbury.

Concern that development would not be appropriate in the context of the existing settlement form, pattern and character of the landscape. Further assessment required if part of the site were to be considered further.

The Council's Archaeology Officer has advised that care needed as partly early enclosure and secondary woodland." (our underlining)

As a result, the following "**SUITABILITY CONCLUSIONS**" comments are made:

"Site would be inappropriate in context of the settlement form, pattern and character of the landscape.

Local Wildlife Sites within site."

The site is assessed as "UNSUITABLE" for development. However, this does not appear to be a balanced conclusion as it does not take into account the potential benefits which can be delivered through the allocation of this site for development. Warren Road is planned to serve as the western, fourth access to Sandleford Park in accordance with adopted and emerging Local Plan policy and the adopted Sandleford Park SPD. The Sandleford Park South development includes the delivery of a Link Road which would run between the western part of the Sandleford Park strategic development site within New Warren Farm and the A343 Andover Road at Sandpit Hill, Wash Water, providing a fifth access to Sandleford Park. The delivery of this road infrastructure would redistribute traffic from Sandleford Park, relieving Monks Lane, Andover Road and Warren Road as west-bound routes to the A34. In this regard, the HELAA's "Suitability" assessment also includes the following "HIGHWAYS AND ACCESS" comments:

"Access:

Vehicular access for this site and the adjoining sites would be obtained via the A343 Andover Road with a 6.0 metre wide through road northwards connecting into Sandleford. This is very important as it allows traffic to not only spread from these three sites, but will also provide a fifth access for Sandleford that will reduce traffic on Andover Road to the north. The access onto the A343 will need to be a full roundabout or a traffic signal junction. If this through route is not intended then Highways will not support any of these three sites." (our underlining)

The Council's Highways Engineer's comment that the delivery of the strategic road infrastructure through the site is "very important" has not been balanced against the perceived landscape harm that the development of the site may cause, even though the Landscape assessment concludes that "Further assessment required if part of the site were

to be considered further." This indicates that the Landscape comments were preliminary comments, and that the potential landscape impact of housing development on the site actually requires further assessment before any conclusions can be reached on the site's Suitability for development.

However, on the basis that the HELAA's assessment is that the NEW8 site is not "Suitable" for development, the HELAA goes on to state that the site's AVAILABILITY is *"Not assessed due to site being unsuitable"* and similarly that the site's ACHIEVABILITY is *"Not assessed due to site being unsuitable"*. As a result, the NEW8 site is classified as *"Not developable within the next 15 years"* – apparently solely on the basis of a preliminary landscape assessment which is not balanced against the "very important" benefit of the delivery of the fifth access to Sandleford Park which the development of this site would deliver.

Our Clients believe that the Council's HELAA assessment of this site as being UNSUITABLE for development for landscape impact reasons is incorrect because consideration has not been given within the assessment to the potential for any such impacts to be mitigated. Furthermore, in reaching a conclusion that the site is unsuitable, the Council is missing an important opportunity to identify land for residential allocation in a sustainable location as part of the Local Plan Review that would secure the delivery of "very important" strategic road infrastructure.

For these reasons, our Clients have commissioned a Landscape Appraisal of the site which has been prepared by Andrew Cook BA (Hons) MLD CMLI MIEMA CEnv, Executive Director of Pegasus Group, which explains why the site is suitable to accommodate residential development in a form proposed from a landscape and visual perspective, as shown on a revised version of the Sandleford Park South Masterplan which also accompanies this submission. That Landscape Appraisal forms an important element of this submission and we provide a summary here, drawing out the key points raised, as follows:

Development Context – *"...residential development located across the promotion site would effectively dovetail into the existing residential properties located to the east of Andover Road and link seamlessly into the residential allocation to the north";*

Environmental Designations – *"the site is relatively free of environmental*

constraints";

Visual Amenity – "the site benefits from a significant degree of visual containment such that development as proposed with the masterplan would not have a significant visual effect upon the surrounding settlements or countryside".... "By introducing a substantial tree belt running along the southern boundary of the western half of the site on the steeper slopes and adjacent to the River Enborne watercourse, such a linear tree belt would provide substantial screening for residential properties on the lower slopes of the site. With a spine road running through the site orientated east-west linking the Andover Road with the residential allocation to the north, this would provide the opportunity to introduce substantial tree cover along this highway corridor."

Landscape Character – "the site and its immediate environs form a heavily wooded landscape and that as far as the site is concerned, it physically and visually relates to the River Enborne Valley, a shallow narrow valley which is broadly orientated east-west linking Newtown and Newtown Common to the east with Enborne Row to the west. Beyond the boundary of the settlement itself, there is a sense of rurality and this is achieved because there is little by way of visual connection with the adjacent settlements and in particular, Newbury and Wash Common to the north"....";

" There is a wooded character to the landscape, and this is also evident on the site";

" The proposed masterplan envisages a number of neighbourhood areas which are set within the retained vegetation and in particular tree cover that frames and subdivides the site. As a consequence, the residential neighbourhoods would have a strong sylvan backdrop and character to them which reflects the general character of the immediate locality. The proposed development would therefore be in keeping with the character and appearance of the local existing residential neighbourhoods".

Potential Development Framework Strategy – "In terms of visual amenity, the eastern half of the site is extremely well contained in visual terms given the topography and configuration of tree cover and woodland framing the site. Whilst

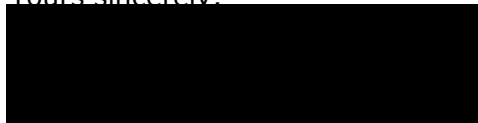
the western half of the site is more visible from some public footpaths on the southern side of the valley, by introducing a tree belt along the southern boundary of the site adjacent to the Enborne River as a riparian wooded landscape, together with a strong boulevard feature defining the spine road which traverses the mid slope, both these features would effectively visually frame residential neighbourhoods on the upper and lower slopes within the western half of the site".

Concluding Remarks – "A residential development within this site accommodating the field and vegetation pattern would ensure that the proposal would reflect the grain of the landscape and in so doing would be in keeping with the character and appearance of other residential neighbourhoods in the local landscape and townscape. This would ensure that the residential scheme would be successfully integrated into the existing landscape framework of the site and its surrounding area."

This Landscape Appraisal confirms that, in landscape terms, the site is SUITABLE for a sensitively designed and landscaped residential development of the form illustrated in the accompanying indicative Masterplan. The site is also AVAILABLE and ACHIEVABLE, such that its HELAA assessment should be updated to treat it as a potential candidate site to be allocated for housing development.

On behalf of my Clients, Donnington New Homes and Gladman Developments Ltd., I look forward to the Council's acknowledgement of its receipt of these representations to the Emerging Local Plan, and I look forward to receiving notification of the next steps in the Local plan process in due course.

Yours sincerely,



Jeremy Gardiner
Senior Director



Encs:

Landscape Appraisal – Pegasus Group 05.02.21

Sandleford Park South Masterplan Rev F 03.02.21

P20-2234 Sandford Park West

2nd March 2023

[REDACTED]
Planning and Transport Policy Manager
West Berkshire Council
Council Offices
Market Street
Newbury
RG14 5LD

Dear [REDACTED]

**Ref: West Berkshire Local Plan Review 2022-2037 – Regulation 19: Proposed Submission
Sandford Park West**

On behalf of our Client, Donnington New Homes, I write in response to the Council's current consultation on the emerging West Berkshire Local Plan Review 2022-2039 (hereafter 'the Plan'). As you will be aware from past submissions, my client controls the western portion of Sandford Park (known as Sandford Park West) allocated by the existing West Berkshire Core Strategy Policy CS3. That Policy allocates approximately 134ha of land to provide a strategic housing development. Donnington New Homes has consistently promoted the land for over 10 years, demonstrating my client's ongoing commitment to its delivery. In 2018, my client submitted a planning application (ref. 18/00828/OUTMAJ) for the development of land within its control that was to be considered jointly with a corresponding application submitted by Bloor Homes and the Sandford Farm Partnership (SFP), on the balance of the site. Since that time, Bloor Homes and SFP have obtained planning permission on the land within their control (in May 2022), following appeal and Secretary of State 'Call In' which demonstrates the acceptability of development on the site at this location. This decision is a key part of the Plan's implementation and

3 West Links, Tollgate, Chandlers Ford, Eastleigh, Hampshire, SO53 3TG
T 023 8254 2777 E Solent@pegasusgroup.co.uk
Offices throughout the UK

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The overarching principles of distribution of development, as set out within Policies SP1 and SP3 of the Plan, are supported. Those being that Newbury will, as the most sustainable settlement in the District, continue to be the focus for new development. My client welcomes the clarification within **Policy SP1 – Spatial Strategy** stating that Sandleford Park is '*an urban extension*' as opposed to a '*new urban extension*' as it was referred to in the Regulation 18 Plan. As set out above, the site has been allocated for in excess of 10 years and part now has planning permission, so to make reference to the site as a '*new*' site was previously incorrect.

To emphasise the importance of Newbury as the continued focus for new development, the commentary within the Plan relating to the extensive area covered by rural parishes and AONB (74%) is welcomed. The continued protection of the AONB will be, to an extent, reliant on the delivery of the majority of new development within and around Newbury and Thatcham. My client's site at Sandleford Park West will make a valuable contribution to that delivery.

The principle of Newbury continuing to be a '*prime focus for new development*' as set out in **Policy SP3 – Settlement Hierarchy** is also supported. Newbury and Thatcham continue to be the most sustainable locations for new development providing a range of services, together with linkages to higher order services in surrounding cities. New development, and the associated increase in population, will mean that existing services will continue to thrive and also support new ones, which, in turn, will mean both Newbury and Thatcham can continue to be the key economic and social hubs of the District. On the basis that Newbury is the most sustainable settlement in the District, clarification that the scale of new development in those areas will '*be expected to...*' be proportionate to the level of services and facilities in the settlement is welcomed – Sandleford Park West is of a scale that has the ability to sustain existing, and support new services and facilities in and around Newbury.

Policy SP5 – Responding to Climate Change: My client continues to support the principles of this policy which seeks to ensure new development responds appropriately to climate change. However, the introduction of the requirement to '*achieve net zero operational carbon development*' poses a risk to the viability of new development which, in turn poses a risk to the delivery of new development and, ultimately, the delivery of the targets contained within the Council's Plan. The inclusion of the words '*...will be required to...*' represents an excessively onerous



expectation at a time when development is already being challenged by the introduction of BNG later in (November) 2023. Since the Regulation 18 Plan was published, Part L of the Building Regulations has come in force. This provides a measurable benchmark against which new development could be considered. To futureproof the Policy, the wording should be amended to require **new development to comply with the Building Regulations in force at the time the development is considered** instead to requiring all new development to meet potential unattainable targets that render a development unviable. The deletion of the 'blue' infrastructure from 'k.' of the policy limits the valuable contribution new and existing water environments can make to the ability of new development to positively respond to climate change over time.

The principle of Landscape led development outlined in **Policy SP8** is generally supported however, reference to the 2019 West Berkshire Landscape Character Assessment could become outdated during the lifetime of the Plan. As such, the wording of the Policy should be amended so that, after the words '*set out in the West Berkshire Landscape Character Assessment (2019)*'; the words '*or landscape character assessment relevant at the time the application is determined*'. This will avoid any ambiguity for developers in terms of which benchmark development is being assessed against.

Like Policy SP5, my client supports the principles outlined in **Policy SP11 – Biodiversity and Geodiversity**, however reference within the policy to the requirement for '*10% Biodiversity Net Gain*' is currently unlawful – the Environment Act 2021 sets out that this requirement will be mandatory from a yet to be confirmed date, in November 2023. As such, at the time of drafting, the Council does not have the legal basis upon which to require applicants to provide this requirement. Accordingly, Policy SP11 should be amended to reflect the relevant, national requirement for Biodiversity Net Gain in force at the time an application is considered.

Policy SP12 – Approach to Housing Delivery: Table 2 which supports this Policy identifies that Sandford Park will deliver 1,580 units within the Plan period. This target is considered to be a robust prediction which my client supports. There is however, conflict with the following Policy in the Plan (**Policy SP13 – Sites allocated in Newbury and Thatcham**), between the figures cited for Sandford Park Strategic Site whereby Policy SP13 identifies a figure of only 1,500, 80 units less than SP12. On the basis the Secretary of State has already approved 1,080 on land controlled by



Sandleford Farm Partnership/Bloor Homes, the figure contained in Policy SP12 is the correct figure to include within the submission plan.

As a point of consistency **Policy SP13** refers to Sandleford Park as just that ('*Sandleford Park*') whereas, Table 2 of **Policy SP12** refers to it as '*Sandleford Park Strategic Site*'. To further confuse matters, in **Policy SP16** which actually allocates the site, it is referred to as '*Sandleford Park Strategic Allocation*'. The Plan should be consistent throughout in its reference to the name given to each site to ensure that the Plan is clear and consistent.

Clearly our client **supports Policy SP16: Sandleford Strategic Site Allocation**. As drafted however, the Policy is unclear in relation to the requirement for Flood Risk Assessment whereby the Policy states that '*a detailed flood risk assessment with hydraulic modelling will be required for the whole site*'. It is very common for a site of this scale to be under multiple ownerships / control and not uncommon for separate flood risk assessments (FRA) to be prepared by each applicant depending on the ability to manage water on land within their control. As drafted, the Policy could be interpreted to require a full site (i.e. all land within the red line accompanying Policy SP16) FRA to be submitted in all circumstances, regardless of which land / parcel of land an individual planning application relates to. This is unnecessary. It is entirely reasonable and appropriate for a FRA to relate only to land within a red line submitted with a planning application and, subject to that FRA taking into account the circumstances (such as levels, gradient, ground conditions), at a reasonable scale, of surrounding land, that FRA should be considered acceptable and allow a parcel of land within a wider site / allocation to come forwards (as has happened, with the Secretary of State's approval, for that part of Sandleford Park controlled by Bloor Homes). Accordingly, **Policy SP16, should be amended**, to be clearer that a FRA for "the site" need only to relate to the land within a red line submitted with any given planning application.

There is a requirement for the wording within the Policy to be further amended to clarify the requirements in relation to housing mix. As currently drafted, the Policy requires that there should be an emphasis on homes with at least 3 bedrooms. It is entirely reasonable to expect that the housing mix requirements within the District may change over the Plan period and accordingly, Policy SP16 should be clearer that the housing mix should respond appropriately to the SHMA (or



other relevant housing needs assessment) requirements relevant at the time an application is considered.

In relation to the red line plan contained within the Plan relating to Sandleford Park, it is unclear why the Council has excluded land to the rear / south of Ashton House and Lynwood House at the eastern end of Warren Road from the allocation. That land falls within my clients control, and has previously been included in planning application proposals for the Sandleford Park West site. It has no significance in relation to ecology, heritage or other constraint that may require it to be free from development. It is not, therefore, clear why the Council has excluded it from the allocation in the Plan and accordingly, the red line plan should be amended to include that land. Should the Council require clarification on the precise extent of this area of land, my client would be pleased to provide it.

We note that the Reg 19 Plan is consistent with the adopted Core Strategy in excluding Warren Road, west of the entrance to New Warren Farm, from the allocation boundary and this is supported.

The boundary line of the allocation across the south side of Eastern Fields within Sandleford Park West should also be reviewed. The plan contained within the red line includes a 'kink' part way across Eastern Fields. This doesn't appear to tie in with any notable features on the ground and does not accurately represent the land my client has promoted or sought planning permission for. The site location plan submitted with my client's planning application on the land shows a straight line across the boundary of this part of the site. The plan within emerging Local Plan should reflect that position.

There may also be issues around the definition of the red line plan relating to Sandleford Park Strategic Site on the eastern boundary adjacent to A339 and north of the recycling centre. The Core Strategy Plan, and the red line plan relating to planning permission 20/01238/OUTMAJ (Bloor/SFP) include the balancing pond directly west of the A339 and north of the recycling centre. The site access plans approved by the SoS through planning permission ref 20/01238/OUTMAJ show the site access north of that balancing pond. We suggest that the Council should review the site allocation red line in this area to ensure consistency.



Policy SP18 (Housing Type and Mix) now requires 10% market dwellings, and 5 affordable units, to be Building Regulations Part M4(3) compliant. It is unnecessary to repeat Building Regulation requirements within Planning Policy and, accordingly, the policy should be amended to delete this requirement.

Policy DM4 (Building Sustainable Homes and Businesses) requires that, ahead of formal adoption of Future Homes Standard, development achieves a 63% reduction in carbon emissions by on-site measures, as compared to Part L Building Regulations. It goes on to require targets for space heat demand targets. The proposed levels expected by this policy are completely excessively and overly onerous. In terms of evidence for this, the Council's own evidence base for this policy (WBC Evidence Report – Local Plan Review (LPR) – Policies SP5 and DM4 (Evidence Base) confirms that the Climate Change Act sets standards that require 15–20kWh/m²/year space heat demand, by 2025. As drafted, and at the time of drafting, the Council's proposed policy requires a lower threshold at an earlier point *targeted* by the Climate Change Act. The explanation as to why a lower threshold (15kWh/m²/year space heat demand as opposed to a range of 15–20) has been included in the Policy is that the '*....target was revised to less than 15kWh after further consideration at the officers' workshop....*'. The technical evidence discussed during that workshop is unclear along with whether any relevant, industry experts attended/informed the conclusions drawn.

On a similar theme, para 9.5 of the Council's evidence paper outlines the proposed approach in relation to carbon Target Emission Rates. The paragraph sets out assumptions for % reductions in carbon emissions based on 63% being '*approximately equivalent to 75% on the Part L 2013 Building Regulations*'. It is unclear how this 'assumption' has been made, whether the result of the assumption has been tested from an implementation and viability perspective, and whether sound technical advice has been sought in relation to the assumption.

The above are two examples whereby the Council's evidence for the onerous targets set by policy DM4 appears to be questionable, which gives rise to a question mark over the reliability of the policy as a whole. Furthermore, it is unclear whether the policy has been 'tested' in terms of how viable, or not, the requirements are for implementation.



There are other examples within the Evidence Base paper where similar 'assumptions' appear to have been made, and there is a lack of clarity on why the Council has drawn the conclusions it has. Given the technical topic area, before, potentially unsound, evidence is used to inform a policy that could place requirements on the development industry that could compromise future viability, it needs to be rigorously tested by industry experts with the technical expertise to impartially advise on the implications of the various measures/targets proposed.

The policy should be re-drafted once these points have been taken into account and properly addressed.

The amendments to **Policy DM15 – Trees, Woodland and Hedgerows** are welcomed as they provide the flexibility for trees which are of a lower quality to be replaced, at an appropriate location and scale, to maximise the development potential of allocated and other sites.

Policy DC36 – Parking: Objection is raised to this Policy as drafted because it excludes garages from being counted as part of parking provision on housing sites. No justification has been provided for this. Garages should be included where alternative storage space is provided on plot or within a garage of adequate dimensions for items such as bicycles. For comparison, **BCP Council's "Parking Standards SPD"** (adopted January 2021) allows garages to be counted as parking spaces where they meet minimum internal size requirements of 7m x 3.3m. Paragraphs 3.2.10 – 3.2.11 of this SPD state:

"Research has shown that in many developments less than half of all garages are used for car parking, instead being used for storage. In terms of sizes, an internal minimum of 7m x 3.3m is considered appropriate to ensure that a large modern family car (eg SUV) will fit comfortably with a minimum circulation space to allow for some general storage which may include cycles..."

"This 7m x 3.3m must be a clear, unobstructed space to allow a vehicle to enter and exit safely. Garages must also have entrances wide and high enough to allow for large family cars.....Garages will only be counted as a parking space where they meet the minimum size requirements..."

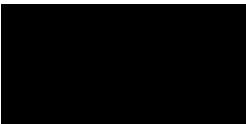


It is recommended that the Council takes this approach to the treatment of garages as parking spaces. Otherwise, to completely discount garages from every housing site's parking provision will have significant negative effects on the efficient use of land, contrary to Government guidance.

The Policy also fails to acknowledge and allow for the valuable contribution that on-street car parking can make to parking provision on a site, particularly for visitors. It is considered that the Policy, as drafted, lacks sufficient detail to address these issues and that a new Parking SPD should be prepared and adopted by the Council to address this matter.

On behalf of my client, Donnington New Homes, I look forward to the Council's acknowledgement of its receipt of these representations to the Emerging Local Plan, and I look forward to receiving notification of the next steps in the Local plan process in due course.

Yours sincerely



Rebecca Humble

Associate Planner

