



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

**Ref:**

*(For official use only)*

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

This form has two parts:

- Part A - Your details: need only be completed once
- Part B - Your representation(s): please fill in a separate sheet for each representation you wish to make

**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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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>*

	<b>Your details</b>	<b>Agent's details (if applicable)</b>
Title:		Ms
First Name:*		Sarah
Last Name:*		Pyne
Job title <i>(where relevant):</i>		
Organisation <i>(where relevant):</i>	The Wasing Estate	Pro Vision
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\*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):	Pro Vision (on behalf of The Wasing Estate)
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	SP3; SP12; SP20; SP21; DM35; DM36
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
<b>Positively Prepared:</b> The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		X
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
<b>Effective:</b> the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please refer to our accompanying statement for our full representations.

## 3. Complies with the Duty to Co-operate

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

### Do you consider the Local Plan Review complies with the Duty to Co-operate?

Yes

No

Please give reasons for your answer:

#### 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 accompanying statement for our full representations.

#### 5. Independent Examination

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

Yes

No

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

Please see accompanying statement

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.*

#### 6. Notification of Progress of the Local Plan Review

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

*Please tick all that apply:*

*Tick*

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

*Please ensure that we have either an up to date email address or postal address at which we can contact you. You can amend your contact details by logging onto your account on the Local Plan Consultation Portal or by contacting the Planning Policy team.*

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

# **WEST BERKSHIRE COUNCIL LOCAL PLAN REVIEW REGULATION 19 CONSULTATION**

Representations on behalf of The Wasing Estate

Prepared by Pro Vision on behalf of The Wasing Estate

March 2023

**REPRESENTATIONS ON BEHALF OF THE WASING ESTATE**

WEST BERKSHIRE COUNCIL LOCAL PLAN REVIEW REGULATION 19 CONSULTATION  
PROJECT NO. 51380

**PREPARED BY:**

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**CHECKED BY:**

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**DATE:**

MARCH 2023

**PRO VISION**

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## 1.0 Introduction and Background

1.1 These representations are submitted on behalf of our client, The Wasing Estate, in response to the West Berkshire Council Local Plan Review Proposed Submission (Regulation 19) Consultation.

### **Background**

1.2 The Wasing Estate is a traditional farming and sporting rural estate extending in total to some 1,600 hectares. A large proportion of the Estate is currently laid to pasture for livestock, with the farming business operated from Wasing Farm. The Estate also has a number of former farm buildings, many now put to a diverse range of commercial uses, the most notable of these is the successful wedding venue at Wasing Park. Wasing Estate employs a total of 55 people on a permanent basis and a further 141 on a casual basis serving the wedding and events business, making it a significant contributor to the District's rural economy.

1.3 Given the nature and location of the Estate, the majority of its land falls outside of the district's defined settlement boundaries, and within the countryside. Whilst this is not necessarily opposed, it is essential for our client to ensure that policies related to development within the countryside do not preclude the Estate from thriving, expanding and diversifying where necessary.

1.4 A number of sites within Wasing's Estate have been promoted for alternative uses within previous iterations of the draft Local Plan:

- BRIM1: Land East of Manor Farm, Brimpton (for residential use);
- BRIM2: Land West of Manor Farm, Brimpton (for residential use);
- BRIM3: Land at Larkwhistle Farm, Brimpton Common (for employment use); and
- ALD5: Land at Basingstoke Road, Aldermaston Wharf (for residential use).

1.5 It is understood that the council have not pursued the allocation of any of these sites within the proposed submission version of the West Berkshire Local Plan Review (LPR) to 2039, which is addressed below. Further, in order to consider whether a Local Plan is sound, reference needs to be made to the National Planning Policy Framework ('the Framework') paragraph 35. This identifies that a sound Plan is:



- **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’;
- **Justified** – ‘an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence’;
- **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’; and
- **Consistent with National Policy** – ‘enabling the delivery of sustainable development in accordance with the policies in this Framework’.

1.6 We consider that a number of the aspects of the LPR are unsound and require changes to the Plan. As such, these representations make comment on the following policies:

- Policy SP3
- Policy SP12
- Policy SP20
- Policy SP21
- Policy DM35
- Policy DM36

## 2.0 Representations

### Draft Policy SP3 'Settlement Hierarchy'

- 2.1 The National Planning Policy Framework, at paragraph 79, confirms that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Furthermore, it states that planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. For the reasons set out below, we do not consider that the council's proposed settlement hierarchy, as set out within Draft Policy SP3, allows for this.
- 2.2 Draft Policy SP3 identifies the district's 'Urban Areas', 'Rural Service Centres' and 'Service Villages'. As the Plan is currently drafted, neither Brimpton or Aldermaston Wharf villages are proposed to fall within any of these categories, but the draft Policy Map identifies that they benefit from a defined settlement boundary.
- 2.3 Draft Policy SP3, as drafted, notes that, *"Development in smaller settlements with settlement boundaries, and which are not included in the settlement hierarchy, will be delivered in accordance with Policy SP1. Development outside of these settlements, in other rural hamlets and in isolated groups of development will be restricted to that which is appropriate in a rural area as set out in Policy DM1."*
- 2.4 The supporting text, at paragraph 4.37, expands by stating: *"Settlements outside of the settlement hierarchy will deliver additional development but this will be limited to infill or change of use within the settlement where a settlement boundary has been defined, and to rural exception schemes for affordable housing to meet local needs. Some limited development is important for the long-term sustainability of rural communities. Outside these settlements, in the countryside, a more restrictive approach to development will be taken as set out in other policies in the LPR."*
- 2.5 We note that the council also place the same restriction to allow only infill or changes of use to development within Rural Service Centres, and Service Villages (as stated within draft Policy SP3).
- 2.6 Paragraph 6.31, in respect of the role of settlement boundaries, states that *"Sites within settlement boundaries are not being allocated. This is because settlement boundaries are a long established planning tool. They identify the main built up area of a settlement within*

*which development is considered acceptable in principle, subject to other policy considerations.”* This sentiment is also repeated at paragraph 3.1 of Appendix 3.

2.7 The Estate objects to the council’s inconsistent approach to development within settlement boundaries. It is apparent that settlement boundaries, as a “long established planning tool” identify areas in which development is considered acceptable in principle, nevertheless in many instances the council are proposing to limit development to only ‘infill or change of use’. This is unnecessary and unjustified, and this restriction should be removed to encourage growth.

2.8 Draft Policy SP3 does (in principle) allow for non-strategic sites to be allocated for housing and economic development, albeit at the ‘service village’ level, through other policies in the Plan or in Neighbourhood Plans. We support this and would add that allocating non-strategic sites to ‘smaller villages’ would not be inconsistent with the draft LPR spatial strategy. However, the Estate maintains its objection to the draft LPR only identifying housing site allocations at the ‘service village’ level and above and considers that smaller villages and rural areas are also able to make a contribution to housing supply as well as to delivering a wider choice of homes.

2.9 The council’s Site Selection Methodology document (January 2023) confirms that, in respect of assessing potential sites for development, states:

*“Sites which were not ruled out in the HELAA were assessed to determine which settlement they fell in. Sites in settlements below the hierarchy or in ‘open countryside’ have been ruled out from further consideration because they are considered to be within unsustainable locations. The exception to this has been the employment sites as several of the Designated Employment Areas are located in locations outside of the settlement hierarchy. In addition, paragraph 85 of the NPPF is clear that planning policies should recognise that sites to meet local business needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport.”*

2.10 The Estate objects to this approach and have concern that this will have serious implications for rural communities. If development in the ‘smaller villages’ continues to be severely restricted, and without opportunities for growth in suitable locations within and around these villages, rural communities and their valued services and facilities will continue to decline and it is conceivable that they may disappear altogether. The draft LPR does not

support the vitality of rural communities since it fails to identify opportunities for these villages to grow and thrive. The LPR is contrary to the NPPF in that regard.

- 2.11 We also note that the council is still maintaining its stance that Aldermaston Wharf should not be classified as a service village despite scoring 21 points as set out within the evidence base related to the Settlement Hierarchy. Aldermaston Wharf scored highly enough to be, and it performs the function of, a 'service village'. It is a sustainable settlement, with key services including a village hall, access to employment opportunities and a convenience store. In addition to this, there is a public house, a private school, mobile library service, a nursery, recreation ground and children's play area.
- 2.12 As noted in the Topic Paper, Aldermaston Wharf benefits from excellent public transport and is highly accessible. There is a mainline railway station and bus stops, providing regular services to Reading, Newbury, Thatcham and Beenham. A footpath and cycleway has recently been constructed, which connects Aldermaston Wharf with Aldermaston Village. Aldermaston Wharf and Aldermaston Village are very well linked and should be looked at holistically. Aldermaston Village provides key services and facilities, such as a primary school, a convenience store, a village hall and a farm shop, all of which are easily accessible from Aldermaston Wharf.
- 2.13 Aldermaston Village is currently a 'service village' in the Core Strategy but is proposed to be downgraded as part of the LPR settlement hierarchy review. We reiterate that we do not support this approach and consider that Aldermaston Village should remain a 'service village', given there has been no significant change to the settlement, nor any known loss of key services and facilities.
- 2.14 It is evident that the decision to categorise both Aldermaston Wharf and Aldermaston Village as 'smaller villages' is not justified for the above reasons. Moreover, it would appear that sufficient weight has not been given to the high level of accessibility of Aldermaston Wharf in the settlement hierarchy review. We therefore encourage the Council to reconsider this, noting that both Aldermaston Wharf and Aldermaston Village both clearly perform the function of 'service villages' and are scored at the 'service village' level.
- 2.15 As a 'service village', it would clearly be appropriate and consistent with the LPR's spatial strategy to allocate a housing site at Aldermaston Wharf to help sustain the range of services and facilities, improving the vitality of the village and in turn, supporting the wider rural economy, noting that *"where there are groups of smaller settlements, development in*

*one village may support services in a village nearby”* (NPPF Paragraph 79). Housing allocation sites should not be precluded due to a perceived lack of services and facilities. Rural housing is essential to ensure the long-term viability of these services and facilities.

- 2.16 Notwithstanding this, even as a ‘smaller villages’, housing site allocations at Brimpton and Aldermaston Wharf, including BRIM1, BRIM2 and ALD5 which are located adjacent to the existing settlement, would be consistent with wider aims to sustain a prosperous rural economy. For the council to make a blanket statement that sites in settlements below the hierarchy or in open countryside have been ruled out of further consideration because they are unsustainable is inconsistent with the fact that many rural villages have defined settlement boundaries, which in turn suggests that the principle of new development is acceptable. Furthermore, and what the council have failed to consider, is that many people desire living in rural locations, and to provide new housing in such locations is to meet the strategic objective of providing a range of sites to meet the district’s housing needs and aspirations. The LPR is therefore not justified, not consistent with national policy and not positively prepared. The LPR is therefore unsound.
- 2.17 Previous representations in respect of sites BRIM1, BRIM2 and ALD5 are appended for the Inspectors consideration (Appendix A and B respectively) to highlight that these are suitable locations to accommodate new residential development. This is particularly important given the objections that are raised in respect of the council’s overall approach to the delivery of housing, below. We note that in respect of Site ALD5, the council had concerns over flood risk on part of the site; to alleviate these concerns and clarify the current position in terms of the extent of flood risk on the site, we enclose (at Appendix C) a short letter from Dr Chris Whitlow of Edenvale Young and confirm that the Estate is willing to provide further technical information as and when required. Draft Policy SP12 ‘Approach to Housing Delivery’
- 2.18 Draft Policy SP12 explains that provision will be made for 8,721 to 9,146 net additional homes for the period 1 April 2022 to 31 March 2039. It is acknowledged that the target figure of 538 dwellings per annum (dpa) does not constitute a ceiling or cap to development. The target figure of 538 dpa is a 5% uplift on the local housing need (LHN), as calculated using the standard method.
- 2.19 In this regard, we note that the Regulation 18 version of the West Berks LPR included a 10% buffer/uplift, but that this has been reduced to 5%, as set out within the Housing

Background Paper, to provide a balance between boosting housing supply in the district while considering the limitations and constraints of a largely rural district (paragraph 2.33).

- 2.20 The Council does not provide any justification that a 10% buffer/uplift (or greater) to the housing requirement could not be accommodated within the district without harm to those constraints. Indeed, none of the key environmental constraints (e.g AONB) in the district or the rural nature of the district preclude the principle of residential development (different to floodplain, Green Belt etc.), but instead will shape the form and direction of growth across the district via the broad spatial strategy. As such, there is no justification to identify such a reduction in housing growth during the plan period on this basis, particularly as there appear to be sufficient sites available in the HELAA to accommodate further growth. As such, it is considered that the level of housing currently proposed is insufficient to support the Government's objective of significantly boosting the supply of housing.
- 2.21 It is considered that West Berkshire's housing target should be increased to between 564 - 616 dpa (i.e. a 10-20% buffer/uplift to the minimum LHN), which would equate to finding a supply of between 9,588 – 10,472 dwellings up to 2039. This level of housing will ensure sufficient flexibility to deliver the minimum local housing need, but also provides for choice and contingency to the market and reflect current and future demographic trends and housing market signals and affordability in West Berkshire.
- 2.22 In respect of housing supply, it is concluded that to be positively prepared and sound, the LPR should be allocating more sites for housing over the plan period and we refer back to the comments above in respect of the settlement hierarchy and the council's approach to allocating new sites for development. It is considered that the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy, and noting that many available sites in the 'smaller villages' with a defined settlement boundary have been overlooked contrary to paragraph 79 of the NPPF.

**Draft Policy SP20 'Strategic Approach to Employment Land' / SP21 'Sites Allocated for Employment Land'**

- 2.23 We note that the council have a long history of under-provision of employment floorspace, including offices and industrial uses. The council's most recently published evidence base documents, including the West Berkshire Employment Land Review (ELR) Addendum December 2022 and the Employment Background Paper January 2023, once again identifies a significant shortfall in provision against identified need.

2.24 As drafted, Policy SP21 allocates four sites (ESA1; ESA2, ESA4; and ESA6) for B2/B8 industrial uses, and two sites (ESA3 and ESA5) for Egiii/B2 (office/industrial) uses. Assuming sites ESA3 and ESA5 adopt a 50%/50% split of these uses, the total quantum of new employment floorspace to be provided for across the plan period is as follows:

- B2/B8 = 63,001 sqm
- Egiii = 5,800 sqm

2.25 This is clearly significantly below the identified need for 91,109 sqm of industrial floorspace and 50,816 sqm of office space as set out at paragraphs 7.8 and 7.4 of the Draft LPR Proposed Submission Version respectively. The LPR is also clear that these demand figures are a minimum.

2.26 As such, and at present, it is therefore considered that the plan does not meet the government’s aims as set out within the NPPF to build a strong and competitive economy, particularly Paragraph 81 which states that Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt.

2.27 We note that our client’s land at Larkwhistle Farm, Brimpton Common (ref. BRIM3) has not been identified as an allocated employment site, as promoted. The published updated Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA) November 2022, states that:

*“Overall development of the site would have a neutral impact on sustainability. There is a positive impact on economic sustainability as the site is promoted for employment uses. There are a number of unknown sustainability impacts, especially in relation to environmental sustainability as the final use of the site is unknown. Mitigation measures would be required to ensure no negative impacts occurred, and in many cases could result in a positive impact. There are also a number of potential negative impacts on environmental sustainability due to the rural nature of the site requiring car use to access the site, as well as the loss of a greenfield site. Mitigation measures would be required.”*

2.28 The Estate object to the council’s approach not to allocate this site for much needed employment land on this basis. Firstly, whilst a ‘brownfield first’ approach is generally supported, it is evident that the lack of available, or suitable brownfield sites means that the

council has a duty to consider greenfield sites as alternatives. Secondly, the NPPF paragraph 85 is very clear that in seeking to build a strong and competitive economy, the council should recognise that sites may have to be found in locations that are not well served by public transport:

*“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.”*

- 2.29 As such, we object to the council’s approach to selecting suitable sites as it is not consistent with national policy, nor does the LPR result in a positively prepared plan as it does not meet the objectively assessed needs for employment. The LPR is therefore unsound.
- 2.30 Previous representations in respect of BRIM3 are appended for the Inspectors consideration (Appendix D) to highlight that this is a suitable location to accommodate new employment development. Whilst technically classified by the NPPF as a ‘greenfield site’, it is important to note that the site has been previously used for mineral extraction and the resultant land is of poor agricultural quality; development of this site would not, therefore, result in the loss of the best and most versatile agricultural land.
- 2.31 We note that council’s comments regarding opportunities to improve accessibility by foot, cycling or by public transport and wish to highlight that the Estate’s adjoining land ownership means that there would likely be opportunities to facilitate pedestrian access to nearby local facilities through creating a connection to the public footpath network.

#### **Draft Policy DM35 ‘Sustaining a Prosperous Rural Economy’**

- 2.32 Draft Policy DM35 encourages development proposals that contribute to sustaining a prosperous rural economy and does allow for proposals for economic development in the countryside, which is supported. However the Estate objects to the proposed amendments



to the policy which are considered to be very onerous and conflicting with the aims of national policy:

*a) The proposals demonstrate that the business can make a long term contribution to the rural economy*

2.33 Criteria (a) is now significantly more onerous than previously drafted and clear guidance is not given as to how this policy criteria may be demonstrated. This will preclude many proposals for economic development from coming forward.

*d) Where new buildings are proposed the landowner has not disposed of, or converted, any buildings to a residential use in the previous 3 years which could have met the needs of the development proposed*

2.34 The proposed amendments to criteria (d) are unjustified and significantly more onerous, and prejudice businesses that may have had to previously adapt to earlier changes in circumstances. This criteria fails to accord with Paragraph 82(d) of the NPPF that requires planning policies to be flexible and to enable a rapid response to changes in circumstances, enabling conditions in which businesses can invest, expand and adapt.

*h) New or replacement buildings are located within or adjoining an existing group of buildings and further expansion into the open countryside is avoided*

2.35 This prohibits economic development on any site that does not already have existing buildings or is not already adjoining existing buildings. This approach suggests a presumption against new buildings for economic development, where in fact this is supported under Paragraph 84(a) of the NPPF.

*j) It would not generate traffic of a type or amount inappropriate for the rural roads, byways or restricted byways affected by the proposal or require improvements to these roads, byways, or restricted byways which could be detrimental to their character and use by motorised and non-motorised traffic*

2.36 This criteria is not justified and goes beyond that required by national policy. The assessment of highways impacts should be consistent with Paragraph 111 of the NPPF, which states only that “Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

### Draft Policy DM36 'Farm Diversification'

2.37 Whilst the principle of allowing farm diversification proposals is supported, the Estate objects to draft policy DM26 as drafted, particularly criteria (e), (h) and (j).

*e) When new buildings are proposed, the business has not disposed of a building or converted one to a residential use in the previous 3 years which could have met the need of the development proposed;*

2.38 As above, criteria (e) fails to accord with Paragraph 82(d) of the NPPF that requires planning policies to be flexible and to enable a rapid response to changes in circumstances, enabling conditions in which businesses can invest, expand and adapt. This is an unnecessary criteria and prejudices those where this situation may have arisen as a result of requiring adaptation to changing circumstances. The policy, therefore, is unjustified and fails to accord with national policy.

*h) Any internal and external changes do not harm the significance of a heritage asset in accordance with Policies SP9 and DM12*

2.39 This criteria simply requires consideration of other development plan policies and therefore, for clarity and ease, should be removed as it is unnecessary duplication.

*j) It does not generate traffic of a type or amount inappropriate for the rural roads affected by the proposal or require improvements to these roads which could be detrimental to their rural character.*

2.40 As above, this criteria is not justified and goes beyond that required by national policy. The assessment of highways impacts should be consistent with Paragraph 111 of the NPPF, which requires only that *"Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."*

### 3.0 Conclusion

- 3.1 In conclusion, The Wasing Estate have concerns over a number of the policies as drafted, and overall consider that the plan is not consistent with national planning policy, and particularly the council's strategy and approach in respect of new housing and employment development has not been fully justified. The LPR does not identify sufficient residential or employment sites to meet the district's housing and employment needs. Furthermore, as drafted a number of policies do not provide adequate flexibility and support to existing rural businesses to achieve a prosperous rural economy in West Berkshire. As a result, the Plan is not sound and should be modified to address the concerns in this letter prior to submission.
- 3.2 We trust this Statement clearly sets out our client's position at this stage and respectfully request that the above is given due consideration as part of any examination into the West Berkshire Local Plan. Our client is expecting to participate in the examination of the plan to elaborate on these matters.

## Appendix A – Representations to Regulation 18 consultation: sites BRIM1 and BRIM2

Our ref: 50988/LB/SS

Planning Policy  
West Berkshire Council  
Council Offices  
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Berkshire  
RG14 5LD



05 February 2021

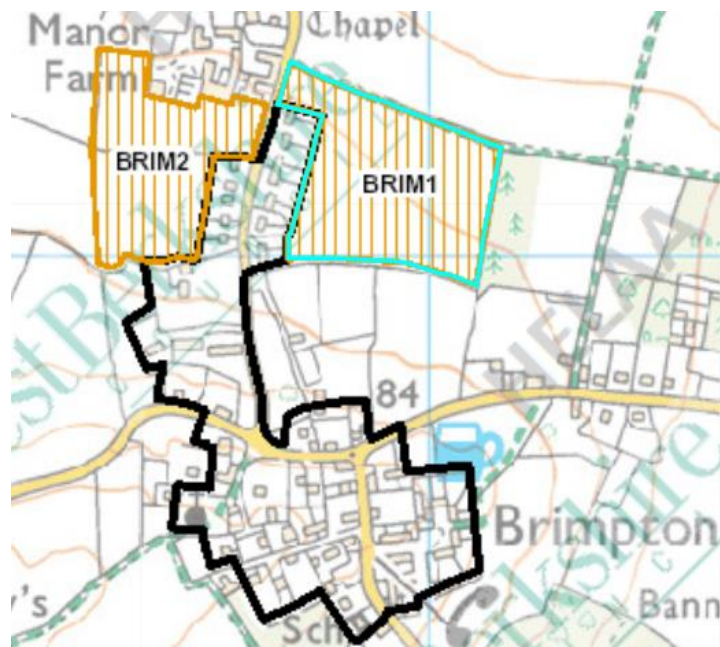
Dear Sirs

### **Land at Manor Farm, Brimpton**

Pro Vision is instructed by The Wasing Estate to submit a representation in response to the West Berkshire Council ("the Council") Regulation 18 Consultation on the emerging draft of the Local Plan Review (LPR) to 2037.

### **Introduction**

This representation relates to our client's land at Manor Farm, east and west of Brimpton Road ("the site(s)"). These sites are identified in the Council's Housing and Economic Land Availability Assessment (HELAA) as BRIM1 (east) and BRIM2 (west), as shown in the Council's map below.



The sites are outside of, but immediately adjacent to the settlement boundary. The sites are also outside of the Area of Outstanding Natural Beauty (AONB).

## **The settlement hierarchy and the role of 'smaller villages'**

Both the West Berkshire Core Strategy (Area Delivery Plan Policy 1) and the draft LPR (draft Policy SP3) categorise Brimpton as a 'smaller village' in the settlement hierarchy. Both policies permit (in principle) limited infill or minor development in 'smaller villages', acknowledging that "*some limited development is important for the long-term sustainability of rural communities*"<sup>1</sup>.

Draft Policy SP3 does (in principle) allow for non-strategic sites allocated for housing and economic development, albeit at the 'service village' level, through other policies in the Plan or in Neighbourhood Plans. We support this and would add that allocating non-strategic sites to 'smaller villages' would not be inconsistent with the draft LPR spatial strategy.

In addition, draft Policy DC1 explains that although there will be a presumption against new development outside of adopted settlement boundaries, there will be exceptions, such as sites allocated as part of the Development Plan. We support this, recognising the importance of sustainable growth in rural communities to help enhance their vitality, as highlighted in the NPPF<sup>2</sup>.

The evidence base that informed the preparation of the draft LPR includes a review of the settlement hierarchy, set out within the 'Settlement Hierarchy Review Topic Paper'. The methodology for the review comprised of a scoring system based on sustainability of settlements in terms of provision of services and facilities. The Topic Paper explains that 'smaller villages' score between 0-15 points, 'service villages' between 16-30 points and 'rural service centres' score over 30 points. Brimpton is placed at the higher end of the 'smaller villages' category, scoring 10 points.

Brimpton has a good range of services and facilities, including a primary school, a village hall, a public house, a hairdresser and a church. The village shop unfortunately closed three years ago. There are also bus stops providing regular services to Thatcham, Beenham and Calcot, as well as a community transport scheme. Brimpton is also within close reach of Thatcham and Baughurst to access other services and facilities which are not available in the village, as and when required.

Brimpton is a suitable location for the allocation of small-scale housing sites to contribute to a range of site sizes for residential development, in accordance with draft Policy SP1. Housing allocation sites should not be dependent on the level and extent of existing service and facilities but instead should be seen as a mechanism to support these services and facilities. Rural housing is essential to ensure their long-term viability and retention. If development in the 'smaller villages' continues to be severely restricted, rural communities and their valued services and facilities will continue to decline. Brimpton has in fact already lost a post office and convenience store and so without opportunities for growth, it is conceivable that its remaining services and facilities will disappear. The pub has been struggling for a number of years, whilst Arkells, the brewery owner, are known to be trying to close it down, and there is also a lack of a community centre. It is vital therefore that essential community services can be supported by an appropriate population.

Housing site allocations at Brimpton would be consistent with the LPRs overarching spatial strategy to promote the sustainability of villages and in turn, supporting the wider rural economy, noting

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<sup>1</sup> Paragraph 4.34

<sup>2</sup> Paragraph 78

that *"where there are groups of smaller settlements, development in one village may support services in a village nearby"*<sup>3</sup>.

### **Settlement boundary review**

In addition to housing site allocations, there also appears to be scope to extend the settlement boundary of Brimpton as part of the settlement boundary review.

Appendix 3 of the draft LPR sets out the Council's intention to undertake this review. Settlement boundaries identify the main built-up area within which development is considered acceptable in principle. The LPR confirms that settlement boundaries will include characteristics such as:

- The main settlement area i.e. the area of close knit physical character; and
- 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.

The current settlement boundary of Brimpton is drawn tightly around the majority of the built-up area, however there appears to be spaces which are not currently included within the boundary, but which clearly follow the existing settlement pattern. Both sites, as can be seen in the above map, are physically, functionally and visually well related to the existing built-up area, immediately adjoining the close-knit linear pattern of frontage development along Brimpton Road. The inclusion of these sites within a revised settlement boundary would represent logical rounding off opportunities to the settlement.

We support the upcoming settlement boundary review, including at Brimpton, as this will encourage and enable the delivery of some small-scale development in the village. In addition to allocations, the delivery of small-scale sites will assist in meeting the Council's housing requirements over the Plan period, noting the important contribution small and medium sites can make as they are often built-out relatively quickly, as confirmed by the NPPF<sup>4</sup>.

### **Land at Manor Farm and site promotion**

The sites have been promoted through the Council's Call for Sites. These are available in the HELAA December 2020 (reference BRIM1 and BRIM2).

BRIM1 is 4.1ha in area and is a greenfield site in agricultural use. BRIM2 is 3.16ha in area and is also a greenfield site in agricultural use. The sites are set within a cluster of existing residential development, with Brimpton Road running north to south through the centre of the village, bisecting the two sites. Manor Farmstead is immediately north of BRIM2.

The HELAA assesses the potential capacity of the combined sites as being approximately 163 dwellings. That level of growth is likely to be regarded as disproportionate in relation to the size of the village and having regard to landscape and heritage considerations. The Wasing Estate therefore considers the scale and form of an allocation or allocations at Brimpton should be

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<sup>3</sup> NPPF paragraph 78

<sup>4</sup> NPPF paragraph 68

determined by a design study but accepts that the scale of growth is likely to be in the range of 20 – 40 dwellings.

The HELAA concludes that at present, the suitability of the sites is unknown as further information on matters such as highways, landscape and ecology are required before a decision can be made.

The HELAA states that the number of dwellings proposed by the developer is not supported by Highways as it is considered too great in terms of impact on the local highway network. Approximately 40 dwellings in total is preferred at both sites (as opposed to approximately 85 in total at both sites). However, Highways England advised that the development of the sites would unlikely materially impact the operation of the strategic road network.

As BRIM2 is located within the setting of the historic farmstead of Manor Farm, the HELAA states that a Heritage Impact Assessment would be required to ensure the site would not harm the setting of the heritage assets.

The HELAA confirms for both sites that *"some frontage development along Brimpton Road would continue the existing settlement form, however development of the whole site would be inappropriate in the context of the existing settlement form and pattern"*.

There are no significant constraints that would prevent the development of the sites. It is also considered that the concerns raised in the HELAA could be addressed and overcome through the submission of technical reports relating to, inter alia, heritage, landscape, highways and ecology, as well as through sensitive design. A highways report will also assist in establishing the total number of dwellings that can be developed at the sites without compromising the local highway network.

The sites are therefore considered to be suitable, available and achievable for development.

### **Summary and conclusion**

Brimpton is a smaller village in which the LPR acknowledges *"some limited development is important for the long-term sustainability of rural communities"*.

Brimpton has a good range of services and facilities and is a suitable location for the allocation of small-scale housing sites, proportionate to the size and nature of the village.

Housing allocation sites should not be dependent on the level of existing services and facilities, but instead should be seen as a mechanism to support these. Rural housing is essential to ensure their long-term viability and retention.

Modest, sustainable growth helps to enhance the vitality of rural communities and the wider rural economy, with groups of settlements supporting each other. The allocation of both sites in the LPR would assist in meeting the Council's housing requirements whilst facilitating sustainable rural growth and importantly, not leaving the 'smaller villages' behind.

In addition to housing site allocations, we welcome the Council's intention to carry out a settlement boundary review. The sites are eligible for inclusion within a revised settlement boundary – the HELAA confirms that *"some frontage development along Brimpton Road would continue the existing settlement form"*. The sites would represent logical rounding off opportunities to the settlement.



We consider the concerns raised in the HELAA can be addressed and overcome both through the submission of technical reports and through sensitive design. There are no significant constraints inhibiting their development, resulting in suitable, available and achievable sites.

We trust that this site will be given due consideration and we look forward to engaging with the Council through the continued preparation of the LPR.

Should you have any queries or require any further information, please do contact us.

Yours faithfully



**Laura Black MRTPI**  
Planner



cc. Wasing Estate

## Appendix B – Representations to Regulation 18 consultation: site ALD5

Our ref: 50988/LB/SS

Planning Policy  
West Berkshire Council  
Council Offices  
Market Street  
Newbury  
Berkshire  
RG14 5LD



05 February 2021

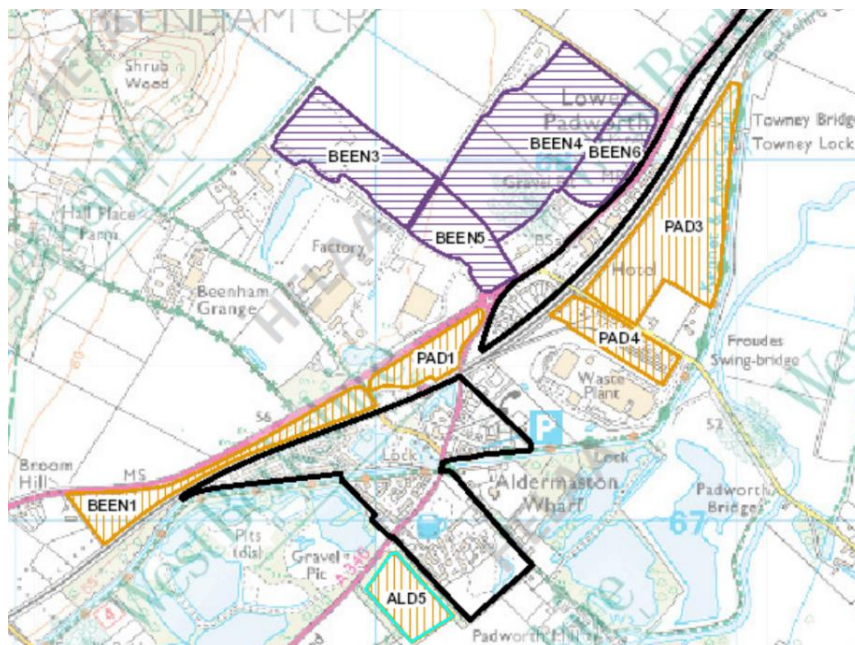
Dear Sirs

### Land at Basingstoke Road, Aldermaston Wharf

Pro Vision is instructed by The Wasing Estate to submit a representation in response to the West Berkshire Council ('the Council') Regulation 18 Consultation on the emerging draft of the Local Plan Review (LPR) to 2037.

#### Introduction

This representation relates to our client's land at Basingstoke Road, Aldermaston Wharf ("the site"). The site is identified in the Council's Housing and Economic Land Availability Assessment (HELAA) as ALD5, as show in the Council's map below.



The site is outside of, but immediately adjacent to the settlement boundary. The site is also outside of the Area of Outstanding Natural Beauty (AONB).

## The settlement hierarchy

Both the West Berkshire Core Strategy (Area Delivery Plan Policy 1) and the draft LPR (draft Policy SP3) categorise Aldermaston Wharf as a 'smaller village' in the settlement hierarchy. Both policies permit (in principle) limited infill or minor development in 'smaller villages', acknowledging that *"some limited development is important for the long-term sustainability of rural communities"*<sup>1</sup>.

Draft Policy SP3 does (in principle) allow for non-strategic sites allocated for housing and economic development, albeit at the 'service village' level, through other policies in the Plan or in Neighbourhood Plans. We support this and would add that allocating non-strategic sites to 'smaller villages' would not be inconsistent with the draft LPR spatial strategy.

In addition, draft Policy DC1 explains that although there will be a presumption against new development outside of adopted settlement boundaries, there will be exceptions, such as sites allocated as part of the Development Plan.

We support this, recognising the importance of sustainable growth in rural communities to help enhance their vitality, as highlighted in the NPPF<sup>2</sup>. However, it should be questioned why the draft LPR only identifies housing site allocations at the 'service village' level and above.

The evidence base that informed the preparation of the draft LPR includes a review of the settlement hierarchy, set out within the 'Settlement Hierarchy Review Topic Paper'. This has been reviewed in order to establish whether Aldermaston Wharf was correctly categorised as a 'smaller village'.

The methodology for the review comprised of a scoring system based on sustainability of settlements in terms of provision of services and facilities. The Topic Paper explains that 'smaller villages' score between 0-15 points, 'service villages' between 16-30 points and 'rural service centres' score over 30 points.

Within the Topic Paper, Aldermaston Wharf scores 21 points, however Bradfield Southend also scores 21 points but is categorised as a 'service village', as is Great Shefford, scoring 22 points. There is therefore either no or only a marginal difference between the scores and assessed level of services and facilities at Aldermaston Wharf and other settlements which have been categorised as 'service villages' and where housing site allocations are proposed.

Even though Aldermaston Wharf scores well above the 0-15 point range to be considered a 'smaller village' it is still placed in this category. Appendix 5 of the Topic Paper describes Aldermaston Wharf, stating that *"the community has access to only three of the key services and facilities, a village hall, convenience store and Protected Employment Area it shares at Beenham Industrial Area, but it benefits from excellent public transport by both rail and bus services. It has reasonable access to other community services and facilities. It is not evident that the settlement offers any additional functionality for the surrounding area. Despite its location on the main transport corridor between Reading and Newbury which indicates a sustainable location, the lack of other key facilities means that the settlement should not be classified as a service village"*.

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<sup>1</sup> Paragraph 4.34

<sup>2</sup> Paragraph 78

When Aldermaston Wharf is compared with Bradfield Southend, there is very little difference between the range and extent of the services and facilities available.

Aldermaston Wharf scored highly enough to be, and it performs the function of, a 'service village'. It is a sustainable settlement, with key services including a village hall, access to employment opportunities and a convenience store. In addition to this, there is a public house, a private school, mobile library service, a nursery, recreation ground and children's play area.

As noted in the Topic Paper, Aldermaston Wharf benefits from excellent public transport and is highly accessible. There is a mainline railway station and bus stops, providing regular services to Reading, Newbury, Thatcham and Beenham. A footpath and cycleway has recently been constructed, which connects Aldermaston Wharf with Aldermaston Village. Aldermaston Wharf and Aldermaston Village are very well linked and should be looked at holistically. Aldermaston Village provides key services and facilities, such as a primary school, a convenience store, a village hall and a farm shop, all of which are easily accessible from Aldermaston Wharf.

Aldermaston Village is currently a 'service village' in the Core Strategy but is proposed to be downgraded as part of the LPR settlement hierarchy review. We do not support this and consider that Aldermaston Village should remain a 'service village', given there has been no significant change to the settlement, nor any known loss of key services and facilities.

It is evident that the decision to categorise both Aldermaston Wharf and Aldermaston Village as 'smaller villages' is not justified for the above reasons. Moreover, it would appear that sufficient weight has not been given to the high level of accessibility of Aldermaston Wharf in the settlement hierarchy review. We therefore encourage the Council to reconsider this, noting that both Aldermaston Wharf and Aldermaston Village both clearly perform the function of 'service villages' and are scored at the 'service village' level.

As a 'service village', it would clearly be appropriate and consistent with the LPR's spatial strategy to allocate a housing site at Aldermaston Wharf to help sustain the range of services and facilities, improving the vitality of the village and in turn, supporting the wider rural economy, noting that "*where there are groups of smaller settlements, development in one village may support services in a village nearby*"<sup>3</sup>. Housing allocation sites should not be precluded due to a perceived lack of services and facilities. Rural housing is essential to ensure the long-term viability of these services and facilities.

Notwithstanding this, even as a 'smaller village' Aldermaston Wharf should be considered a suitable location for the allocation of a small-scale housing site to contribute to deliver a range of site sizes for residential development, in accordance with draft Policy SP1.

### **Land at Basingstoke Road and promotion of the site**

The site has been promoted through the Council's Call for Sites. This was published in the Housing and Economic Land Availability Assessment (HELAA) in December 2020 (reference ALD5).

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<sup>3</sup> NPPF paragraph 78

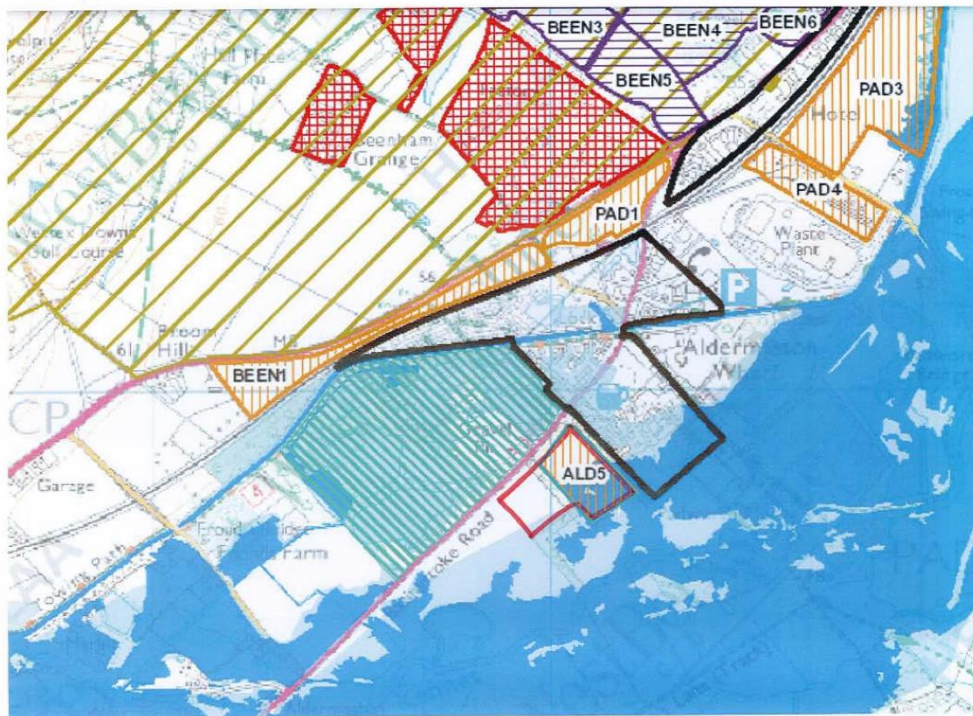
The site is 2.96ha in area and is a greenfield site in agricultural use. To the north is Basingstoke Road, to the south and west is agricultural land and the River Kennet, to the north-east is existing residential development at Fallows Road and Orchard Dene Drive.

The HELAA concluded that at present, the suitability of the site is unknown as further information on matters such as highways, flood risk and ecology are required before a decision can be made.

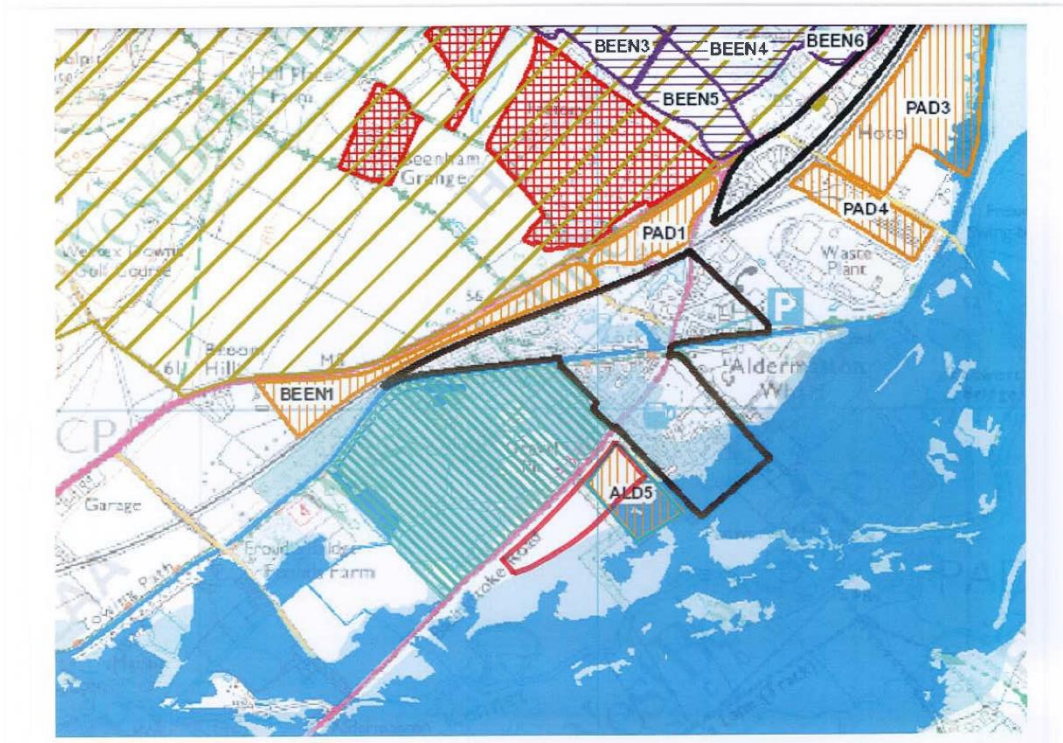
The HELAA confirms that there are no access issues and it is unlikely that the development of the site would result in any material impact on the highway network. It also states that the site is close to Aldermaston Gravel Pits SSSI, however both Natural England and Berks, Bucks and Oxon Wildlife Trust consider that development of the site would not result in large impacts and mitigation measures can be implemented.

In terms of flood risk, the HELAA considers there is a negligible risk of groundwater flooding but a high risk of surface water flooding in the north-west corner only. According to the Environment Agency's flood map, the southern half of the site is a combination of Flood Zone 2 and 3, although it should be noted that only a small part of this southern area is recorded as having historical flooding. The northern half of the site is Flood Zone 1.

The Council's Drainage Officer states that only the northern half of the site is suitable for development for this reason, however as demonstrated in the maps below, a large proportion of the existing residential development to the north-east lies within Flood Zones 2 and 3. Moreover, there have been extensive flood alleviation works carried out by the Estate recently which have significantly reduced the risk of the site flooding. A Technical Note explaining these works will be provided.







In addition to the HELAA site, the Estate own land to the south west along Basingstoke Road (as outlined in red on the above maps). The Estate is open to the promotion of this land also and would be happy to engage with the Council in terms of future development potential. A Call for Sites submission will shortly be made in relation to this land.

It is considered that the concerns raised in the HELAA could be addressed and overcome through both the commissioning of technical reports and careful, sensitive design, resulting in a site which is suitable, available and achievable for development.

There are few opportunities elsewhere in Aldermaston Wharf to deliver housing, as can be seen in the above maps. The allocation of this site would represent a logical, small scale extension to the settlement which would facilitate the sustainable growth of this vibrant rural community.

### **Summary and conclusion**

The categorisation of Aldermaston Wharf as a 'smaller village' in the settlement hierarchy review is not justified. It is clear that it meets the criteria for a 'service village', both in terms of its performance and function and its scoring.

It is a sustainable rural settlement which not only offers key services and facilities, but is highly accessible, benefitting from excellent public transport, as well as a cycle and footpath link to the neighbouring Aldermaston Village. Aldermaston Wharf and Village should be considered holistically.

Nonetheless, even as a 'smaller village', Aldermaston Wharf is suitable for housing allocations proportionate to the size and nature of the village.

Housing allocations should not be precluded on the basis of limited existing services and facilities. Rural housing is essential to ensuring the long-term viability and retention of these services and

facilities. Modest, sustainable growth helps to enhance the vitality of rural communities and the wider rural economy, with groups of settlements supporting each other.


We consider the concerns raised in the HELAA can be addressed and overcome through a combination of the commissioning of technical reports and careful design, resulting in a suitable, available and achievable site.

The site represents a logical opportunity for a small-scale housing allocation and extension to Aldermaston Wharf. It would contribute towards the delivery of a range of site sizes for residential development, assisting in meeting the Council's housing requirements whilst facilitating sustainable rural growth.

We trust that this site will be given due consideration and we look forward to engaging with the Council through the upcoming stages of the LPR.

Should you have any queries or require any further information, please do contact us.

Yours faithfully



**Laura Black MRTPI**  
Planner



cc. The Wasing Estate



## Appendix C – Letter from Dr Chris Whitlow – Edenvale Young

3<sup>rd</sup> March 2023

[REDACTED]  
The Estate Office  
Wasing  
Berkshire  
RG7 4NG  
By email

**Re: Flood Risk to Land at Fallows Road, Aldermaston Wharf  
(West Berks. Site Ref - "Ald5")**

Dear [REDACTED]

Thank you for your instructions of 19<sup>th</sup> January 2023, requesting a letter of advice regarding flood risk at the above site. This advice is based on recent work carried out in preparing a flood risk assessment for nearby land at Willowmead.

This report is in the public domain and can be viewed on the West Berkshire Council planning portal at <http://planning.westberks.gov.uk/rpp/index.asp?caseref=20/02497/OUTD>. A copy is also attached for ease of reference.

A map showing the location of the aforementioned site from the West Berkshire Helaa interactive map – the site is currently labelled as ald5 - is shown below as Figure 1. The nearby Willowmead site is beneath the text labelling "Comfrey Cottage"

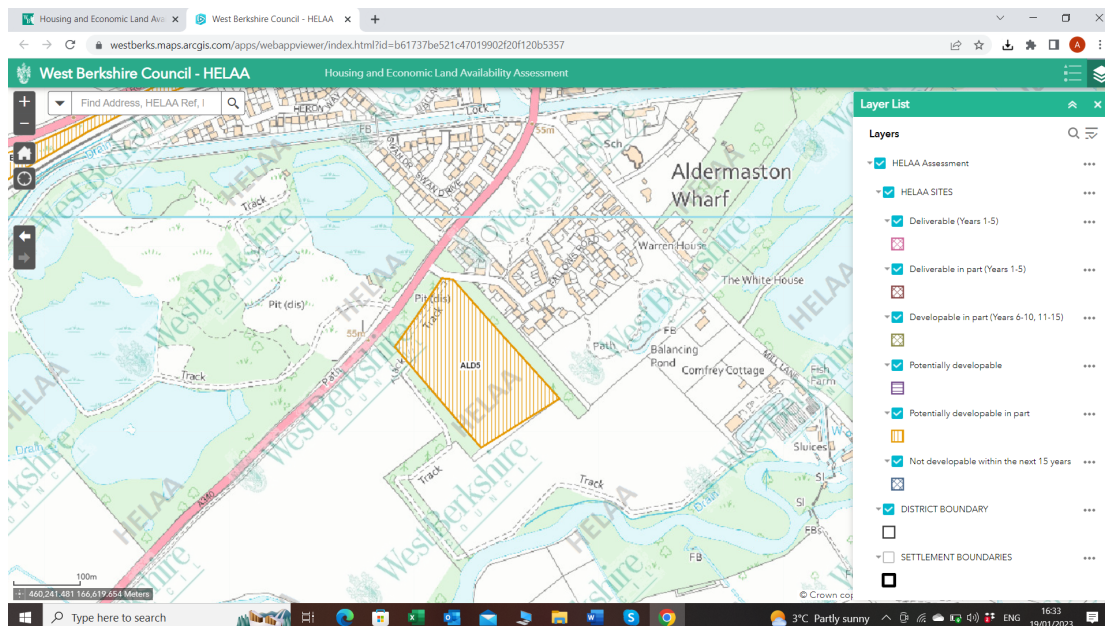


Figure 1: Location of proposed development adjacent to Fallows Road

The strategy adopted to inform this flood risk assessment was to amend the existing Environment Agency Lower Kennet one dimensional hydraulic model between Newbury and Tyle Mill to a so-called 1D/2D model which accords with current best practice. This process also included incorporation of new survey data local to Padworth including survey of the recently constructed low earth bund/bank remediation measure adjacent to the left bank of the river, upstream of the Trout Farm. This structure was designed by Edenvale Young and constructed by the Wasing Estate as emergency works following a breach in the right bank after the period of prolonged high flows in winter 2013/14.. It was consented by the Environment Agency and inspected twice by myself and another colleague at Edenvale Young.

With the bund in place, hydraulic modelling showed that neither Willowmead nor the proposed development land to the west, at Fallows Road, Aldermaston Wharf should be included in the Environment Agency Flood Zones 2 or 3. A zoomed in maximum flood depth map is shown below, taken from Figure 6.7 of this FRA report illustrating this, for the 1 in 1000 year return period (0.1%AEP) flood event. The bund is located to the south of the text denoting the location of the Fish Farm.



Figure 2: Flood depth mapping for 1 in 1000 year return period (0.1%AEP) from Willowmead FRA

Photographs of the bund functioning as designed are included below from December 2019 and February 2023.



Figure 3: December 2019



Figure 4: February 2023

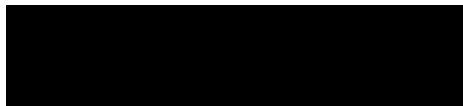
The Willowmead FRA noted that the area was shown partially as having been subject to flooding in June 1971 but that was believed to have been caused by blockage to Padworth Bridge downstream. This is not the case for the proposed

development site off Fallows Road.

It was concluded in the Willowmead FRA that with the new bund in place, the site was not at risk from surface water flooding, reservoir flooding or groundwater flooding so the proposed residential development should be safe from flood risk during its design life. This conclusion can also be drawn for the proposed residential development on the nearby site off Fallows Road.

A further level of resilience was recommended by setting finished floor levels to 53.2mAOD for the proposed development and these levels could be adopted for the proposed development on land adjacent to Fallows Road as a precautionary measure.

Yours sincerely,



(Dr.) Chris Whitlow  
Director

## Appendix D – Representations to Regulation 18: site BRIM3

Our ref: 50988/LB/SS

Planning Policy  
West Berkshire Council  
Council Offices  
Market Street  
Newbury  
Berkshire  
RG14 5LD



05 February 2021

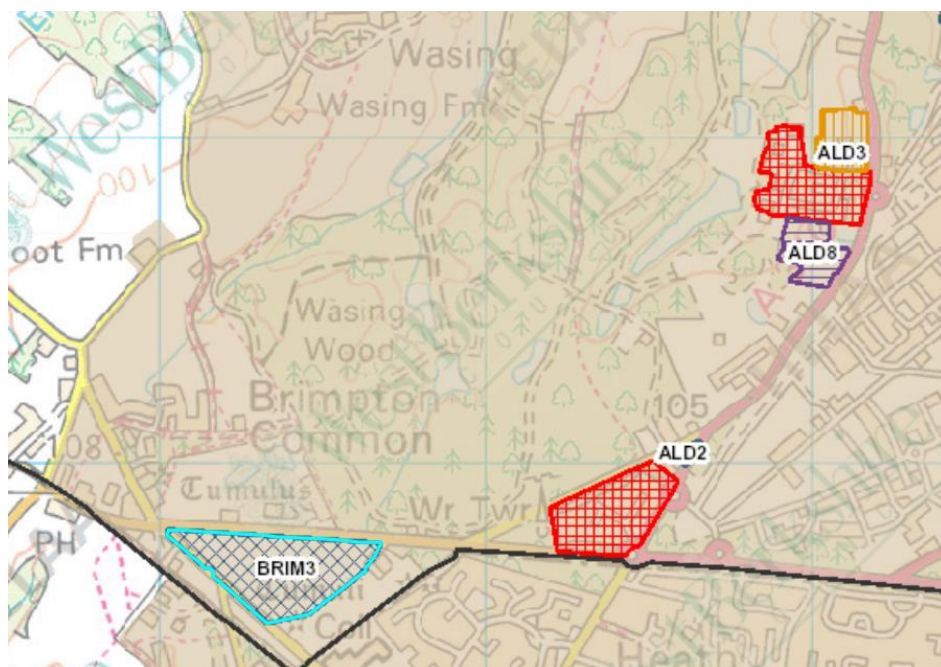
Dear Sirs

### **Larkwhistle Farm, Brimpton Road, Brimpton Common**

Pro Vision is instructed by The Wasing Estate to submit a representation in response to the West Berkshire Council ("the Council") Regulation 18 Consultation on the emerging draft of the Local Plan Review (LPR) to 2037.

#### **Introduction**

This representation relates to our client's land at Larkwhistle Farm, Brimpton Road ("the site"). The site is identified in the Council's Housing and Economic Land Availability Assessment (HELAA) as BRIM3, as shown in the Council's map below.



The site is outside of any settlement boundary and is outside of the Area of Outstanding Natural Beauty (AONB). It is within the inner emergency planning zone of AWE Aldermaston.



## Employment and economic development

The draft LPR explains that West Berkshire's vision is to *"retain and attract sustainable business growth with training and employment opportunities. A variety of different sectors together with a combination of larger businesses and small and medium-sized enterprises will ensure a resilient and sustainable economy.<sup>1</sup>"* Its economic strategic objective is to *"facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities".*

The evidence base that informed the preparation of the draft LPR includes an Employment Land Review, Functional Economic Market Area (FEMA) and Economic Development Needs Assessment (EDNA).

The Employment Land Review states:

- A minimum of 65,000 sqm of new office floorspace should be provided in the Plan. Some could come forward through office provision at Theale (THE8). However, this would neither be quantitatively nor qualitatively sufficient to meet the needs of Newbury;
- The Council should scope the next generation of policies so that if market demand for offices strengthens, it is clear that the 65,000sqm requirement is a minimum and policy is flexible and supportive for all forms of office development;
- For industrial, demand is more pressing given the current market shortage and there is a need to frontload the Plan with 62,000sqm of deliverable sites;
- The HELAA identified only one possible office site in the East of the District and saw nothing at all promoted in Newbury town. The likelihood is that sites are instead being promoted for housing – especially given the weak office market in the past; and
- For both markets the Council needs to consider if additional land can be identified

Draft Policy SP20 sets out the strategic approach to economic development and hierarchy of centres. Within this, it states provision has been made for 62,000sqm of office floorspace and 65,000sqm of industrial, storage and distribution. Both of which are below the identified requirements as set out in the Employment Land Review. This should be reviewed and additional sites identified to at least provide for the District's minimum requirements, noting the recommendations in the Employment Land Review.

The Policy explains that such provision will be achieved by, inter alia, the development of office, other commercial and service uses (class E) and community uses (Class F) outside existing town and district centres provided it can be demonstrated that there are no other sequentially preferable sites within or on the edge of centres and Designated Employment Areas and that the vitality and viability of existing town and district centres will not be adversely affected.

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<sup>1</sup> LPR Paragraph 3.1



Supporting text for draft Policy SP20 states that *"The Council's preferred approach is that if an edge of centre or out of centre site must be utilised for office development, then the site should be located within an existing Designated Employment Area. If this is shown not to be possible, then an impact assessment is required to clearly show that the vitality and viability of the District's town and district centres is not adversely affected<sup>2</sup>."*

Although perhaps overly restrictive, we support this general allowance for office development beyond just the town and district centres and Designated Employment Areas. This would appear to reflect NPPF, stating that *"planning policies and decision should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings<sup>3</sup>."*

Draft Policy SP21 sets out the sites allocated for economic development. It has identified just one site (Theale East Business Centre) for the delivery of new employment floorspace of 20,000sqm. This is well below the identified need of 65,000sqm. Identifying such a small proportion of the overall requirement is highly inadequate. The LPR should go further and identify sufficient deliverable sites to meet the employment needs of the District.

Draft Policy DC31 states that proposals for employment uses will continue to be focused within the District's Designated Employment Areas. We consider the LPR should not rely heavily on existing and Designated Employment Sites to meet the identified requirements. The Council should be flexible and consider if additional land can be identified, as noted in the Employment Land Review.

Nonetheless, although no specific sites are identified, draft Policy DC31 does allow for business uses outside of the District's defined Designated Employment Areas where they are compatible with uses in the surrounding area and do not result in conflict from vehicular movement and/or with the amenity of neighbouring occupiers. We support this allowance and flexibility.

### **Larkwhistle Farm and site promotion**

The site has been promoted through the Council's Call for Sites. This was published in the Housing and Economic Land Availability Assessment (HELAA) in December 2020 (reference BRIM3), as shown in the Council's map above.

The site is 10.6ha in area and is a greenfield site in agricultural use. According to the Agricultural Land Classification (ALC), the site is grade 4 meaning it is of poor quality. The development of this site would therefore not result in the loss of best and most versatile agricultural land.

To the north of the site is the B3051, Lakeside Garden Shop, a truck hire and a reclamation centre. To the south is The Hurst Community College and Leisure Centre. To the west and east is residential development. Brimpton Road forms the south-western boundary of the site. Adjacent to the site to the south is the Basingstoke and Deane Borough Council boundary.

The HELAA concluded that the site is unsuitable for development, however this was based on the site being promoted for residential development.

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<sup>2</sup> LPR Paragraph 7.6

<sup>3</sup> NPPF Paragraph 83 a)

We consider the site to be suitable as an employment site and should be considered as an identified employment site in the LPR.

Larkwhistle Farm is within close proximity (approximately 600m) to Calleva Park, a Designated Employment Area and could be seen as an extension to this Area. Employment uses at the site would be compatible with the uses in the surrounding area, as described above and therefore would not result in conflict with these neighbouring occupiers.

The site is of a sufficient distance away from existing residential development as well as there being intervening fields, meaning there would be no harm to residential amenity. This accords with draft Policy DC31.

### **Summary and conclusion**

The LPR does not identify sufficient deliverable sites to meet the identified employment needs of the District. This is inadequate and the LPR should go further in identifying additional sites.

It has been made clear in the Employment Land Review that the identified requirements is a minimum and that the Council should be flexible and supportive of all forms of employment development.

There should be less reliance upon existing and Designated Employment Sites – the Council should be open to considering if additional land can be identified, as noted in the Employment Land Review.

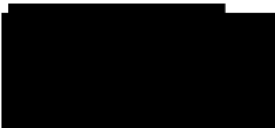
Larkwhistle Farm is a suitable, available and achievable site for employment development. It is appropriately located nearby to Calleva Park Designated Employment Area and would be compatible with surrounding uses. It would also accord with West Berkshire's strategic objective to *"facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities"*.

The allocation of this site would assist the Council in meeting its identified employment needs over the Plan period.

We trust that this site will be given due consideration and we look forward to engaging with the Council through the continued preparation of the LPR.

Should you have any queries or require any further information, please do contact us.

Yours faithfully



**Laura Black MRTPI**  
Planner



cc. The Wasing Estate