


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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.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

	Your details	Agent's details (if applicable)
Title:		
First Name:*	ANTHONY	
Last Name:*	KING	
Job title (where relevant):	CHAIRMAN	
Organisation (where relevant):	WOODLANDERS PROTECTION GROUP	
Address* Please include postcode:		
Email address:*		
Telephone number:		

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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):	Anthony KING WOODLANDEDRS PROTECTION GROUP
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**Please indicate which part of the Local Plan Review this representation relates to:**

Section/paragraph:	
Policy:	
Appendix:	
Policies Map:	
Other:	WHOLE DOCUMENT

### 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

NO

*Please give reasons for your answer:*

IT IS NOT CLEAR THAT ALL LEGAL REQUIREMENTS ARE MET
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## 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	/	
<b>Justified:</b> the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		/
<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		/
<b>Consistent with national policy:</b> the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		/

Please give reasons for your answer:

FOR SPECIFIC AREAS SOME OF THESE CONDITIONS HAVE NOT BEEN MET

## 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.

ALL REFERENCES TO ADDITIONAL INDUSTRIAL DEVELOPMENT AT MEMBURY ES2 AND ES3 SHOULD BE REMOVED.

#### 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:

BECAUSE THERE ARE COMPLEX ISSUE4S AND EVIDENCE THAT NEEDS TO BE EXAMINED.

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

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


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

Please tick all that apply:

Tick

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

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

West Berks Local Plan- Comments.

**PROPOSED SUBMISSION(REG 19) WEST BERKSHIRE LOCAL PLAN REVIEW 2022-2039.**

**COMMENTS OF ANTHONY KING**

**SUPPORTING DOCUMENT- INFRASTRUCTURE DELIVERY PLAN JAN 2023**

Policy SP 21

Table4

ES 2 and ES 3 total land = 15581sq m Floorspace-Membury

Total= 63581sq m for West Berks

Therefore 25% of all the industrial floor space is in an area described by the consultants on economics and land use.

**In a supporting document, Stantec, consultants on employment and land use demand, have stated, regarding Membury, that there is weak market demand and little employment demand. All the demand and population is in the East of the WBC area. In addition they have stated that any distribution businesses should be close to Motorway junctions. Membury is 7km from a motorway junction along a series of country lanes, some undesignated.**

CI 5.92 “..it is important that employers are encouraged to recruit local people in order to boost the local economy and reduce the need to commute long distances by car.”

**There is little availability of a local workforce and many will have to drive long distances by private cars or be bussed in. Hence the Objection of some council officers on the use of Membury sites in the future, as they are unsustainable For example on Walkers Logistics current sites at Membury most of the workforce is bussed in from Reading and Swindon. The current proposal for LAM 6 will only make this worse.**

5.129 and 5.130 “all the development at Membury removes a healthy environmental.....”  
**The generation of traffic from Membury, including significant HGV movements, has removed any leisure activities such as Walking, Cycling or Horse Riding from the local area.**

**DOCUMENT -Appendix 8c SA/SEA of Employment Sites**

**LAM6 .LAND WEST OF MEMBURY ROAD, WALKERS LOGISTICS.**

**Assesment Table page 33.**

SA Sub Objectives- 9a To reduce West Berkshire’s contribution to Green house gas emissions.

**No effects of Policy on SA Objectives are measured**

Mitigation- "Mitigation measures would be required"

Comment- " ..there should be no overall impact on any element of sustainability as a result of this development."

**My comments - The Council's own Officers have stated that this development is NOT Sustainable**

**The Council's own Officers have called for no more development at Membury Industrial Area, as the whole site is NOT Sustainable.**

- Objective 2(a)- "To support healthy active lifestyle.
  - The site will not impact on health, active lifestyle.
  - All sites will need to consider travel planning measures for staff which could include support for active travel to and from site"
  - "The site is promoted for employment use, it is unlikely there will be an impact on any element of sustainability in relation to health, safety, wellbeing and inequalities.

**My Comments- (Note these are based in the current situation and the recently approved development on Lam 6)**

**This Objective, 2a, will never be met, so 2 statements above are untrue for residents who are severely impacted.**

**Staff and workers cannot access this site by walking or cycling and have to use private motorised vehicles. Third relating to sustainability, can never be monitored or regulated.**

**The lanes used as access to this site can NO LONGER be used for walking, cycling or horse riding due to the volume of traffic including small vehicles but especially HGV's which are and will be generated on those lanes to access the trunk road network. It is now extremely dangerous to enter/ exit properties on these lanes. In addition the council have allowed the applicant, Walkers, to suppress the Traffic generation figures in the accepted scheme. This suppression is against Best Practice in Traffic and Transport Planning, can never be monitored or regulated and is possibly illegal. The result of this will be a dramatic rise in HGV vehicles on the access lanes to further reduce the chance of residents leaving their home in a car and preventing residents of the whole area living active lifestyles.**

Objective 4(a) " To reduce accidents and improve safety."

4(b) " To increase opportunities for walking, cycling and use of public transport."

**The traffic generated from Membury and the enormous future traffic to be generated make the surrounding network of lanes extremely dangerous. There are recent examples of HGV and other vehicles hitting a house outside of normal working hours. There is limited opportunity to improve safety and reduce accidents.**

**There is no viable Public Transport near the site. The closest is at Hungerford 10km away.**

Objective 5(a) "To conserve and enhance ...biodiversity..."

Objective 5(b) "To conserve and enhance the character of the landscape."

**Erecting a warehouse the size of a major sports stadium in a field, used for grazing sheep, in the AONB and generating potentially 850 vehicle trips per day CAN NOT conserve or protect anything in the local area.**

Objective 10(a) "To encourage a range of employment opportunities that meet the needs of the district."

(b) (c "To support a strong, diverse economic base..."

**There is little economic benefit to the local area as most of the current Walker's employees live outside West Berkshire and some of those are bussed in from Reading and Swindon.**

**This reinforces the view of the Council's Consultants, Stantec, who carried out the supporting study to this plan, that , as all the employee resources are in the East of the District, the use of the Membury site on the Western edge was not supported and any warehousing should be in the East of West Berkshire close to Motorway Junctions.**

Overall Effect

**Comments on Text.**

**How can anyone say " The site will have an overall neutral impact on Sustainability."**

**The authors if this report have never studied the area or the current site.**

**There are no sustainable travel options available which is why some WBC officers have asked for no further development at Membury.**

**There are limited available staff close to the site and nearly all will come from outside the area, many from Reading, Wiltshire and Hampshire.**

**There is no public transport so they will all have to be bussed in or use their own vehicles.**

**Walking and Cycling are not possible due to the dangerous nature of the local road network.**

**LAM10 Land south of Trinity Grain, Ramsbury Road, Membury( Mixed Employment Uses)**

**COMMENTS.**

**This site is adjacent to the green field to be used for the Lam 9, Walkers, site.**

**On that basis it has similar characteristics.**

**1)Both are a " Green Lung" in the middle of the Membury Industrial Area.**

**2)Both use the same network of country lanes for vehicle access.**

**3)For both there is no available and viable Public Transport to the site.**

**4) Land adjacent to this site is liable to flooding.**

**5) This site is adjacent to rural homes.**

**6) Both are not sustainable and should not be developed.**

**7) Both generate HGV which are a risk to the local populations.**



8) it is not clear what activities would take place on this site but generally the Economy of West Berkshire is strong so it is unlikely that there would be any added Economic gain.

**GENERAL POINT ABOUT THE Industrial Area at Membury.**

West Berkshire should not include this site in this plan as:

- 1) The current sites are unmanaged and the council has little information on the ownership, tenants and changes of use that are taking place.
- 2) There is no joined up Master Plan of the area showing current and future activities or land use.
- 3) There is no Environmental impact Assessment of the whole site or any part of it.
- 4) There is no Drainage Strategy for Membury and hence no site wide drainage infrastructure which is now leading to local flooding.
- 5) There is no understanding of the utilities demand and capacity. The power system in the local area is often down with temporary generators mobilised to support the local community.
- 6) The local road system is unsuitable for the current traffic generation and any increase will further degrade it.
- 7) There is no Risk Assessment available for the site as a whole. With a Live airfield adjacent, a major motorway and service area, chemical storage, major fuel storage and unknown risks within the current businesses there could be a disaster waiting to happen.
- 8) The location is **UNSUSTAINABLE**. There is no **VIABLE** public transport within 10 kilometres, so **ALL** workers, goods, deliveries have to access the site by road based vehicles. As well as making the area unsafe the quality of healthy life is compromised. **COUNCIL OFFICERS HAVE STATED THAT THE INDUSTRIAL SITE IS NOT SUSTAINABLE AND NO FURTHER DEVELOPMENT SHOULD TAKE PLACE.** Despite this the Council continue to approve more vehicle intensive planning applications, sometimes with the **WRONG** traffic generation forecasts

For this local plan, I have focussed on the area I know best and it is clear all plans for further industrial expansion at Membury should be removed, as there is little information to support this and overwhelming information to **STOP** any further development there.

Anthony King  
Chairman of the Woodlanders Protection Group.

