



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cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*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:		Ms
First Name:*		Catherine
Last Name:*		Mason
Job title (where relevant):		Associate Director
Organisation (where relevant):	Lambourn Business Park	Savills
Address* <i>Please include postcode:</i>	C/O Savills	33 Margaret Street, London, W1G 0JD
Email address:*	C/O Savills	██████████
Telephone number:		██████████

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

The accompanying guidance note available at: <https://www.westberks.gov.uk/lpr-proposed-submission-consultation> will assist you in making representations.

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change(s) as there will **not normally** be a subsequent opportunity to make further representations, **further submissions will ONLY be at the request of the Inspector, based on the matters and issues they identify for examination.***

Your name or organisation (and client if you are an agent):	Savills on behalf of Lambourn Business Park
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	SP15 (and Chapter 8)
Appendix:	
Policies Map:	
Other:	

1. Legally Compliant

Please see the guidance notes for an explanation of what 'legally compliant' means.

Do you consider the Local Plan Review is legally compliant?

Yes

No

Please give reasons for your answer:

2. Soundness

Please see the guidance notes for an explanation of what 'soundness' means.

Do you consider the Local Plan Review is sound?

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF)

Please tick all that apply:

NPPF criteria	Yes	No
Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development		✓
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		✓
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		✓
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		

Please give reasons for your answer:

See attached representation.

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.

Inclusion of the site as non-strategic allocation within Policy SP15 in order to ensure the plan is positively prepared, effective and justified. See attached representation for full details.

5. Independent Examination

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

Yes No

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

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

6. Notification of Progress of the Local Plan Review

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

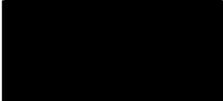
Please tick all that apply:

Tick

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

The adoption of the Local Plan Review	✓
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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.

2 March 2023



By Email Only: planningpolicy@westberks.gov.uk

Planning Policy
Development and Regulation
Council Offices
Market Street
Newbury
RG14 5LD

Catherine Mason

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F: +44 (0) 20 7495 3773
savills.com

Dear Sir or Madam,

**West Berkshire Local Plan Review 2022-2039 – Proposed Submission Version (Regulation 19)
Representations on Behalf of Lambourn Business Park**

On behalf of Lambourn Business Park, we write to submit representations to the West Berkshire Local Plan Review 2022-2039 Proposed Submission Version.

We support the general thrust of the plan and approach to development, however, it is our view that our client's site (land adjacent to Lambourn Business Park) represents a suitable and deliverable site for housing and should therefore be included within the non-strategic site allocations identified under Policy SP15 and Chapter 8 for the North Wessex Downs AONB Area. This amendment will result in a plan that is positively prepared, justified and effective and will ensure that the housing targets for the North Wessex AONB Area are achieved.

This site (1.9 hectares) could deliver a high quality development which makes efficient use of the land and should be included for the reasons set out below. The site has also been submitted as a potential housing site in response to separate consultation in respect of the Lambourn Neighbourhood Development Plan.

In order to be found sound at Examination in Public, the policies in the draft Local Plan need to comply with the tests of soundness set out in paragraph 35 of the NPPF (July 2021). The plan must be:

- "a) **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;*
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- c) **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*
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework." (author's emphasis underlined).*

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East.

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Policy SP3 of the emerging Local Plan identifies Lambourn as a Rural Service Centre offering development potential appropriate to the character and function of the settlement.

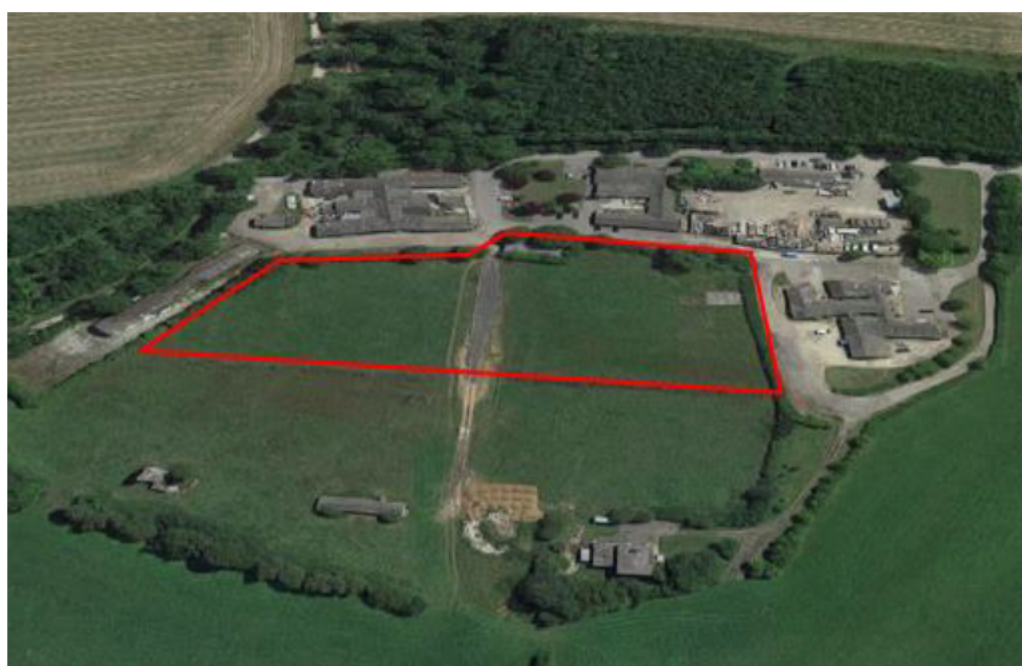
Policy SP1 of the emerging Local Plan identifies the spatial strategy for West Berkshire to:

- Direct development to areas of lower environmental value;
- Optimise the use of previously developed land; and
- Optimise the density of development to make the best use of land whilst conserving and enhancing the distinctive character and identity of the built, historic and natural environment.

Policy SP2 of the emerging Local Plan (North Wessex Downs AONB) states that the North Wessex Downs Area AONB will have appropriate and sustainable growth that conserves and enhances its special landscape qualities.

The proposed site offers the potential to deliver housing in accordance with emerging policies SP1 – SP3 for the following reasons:

- The site is ‘wrapped around’ by other parts of the business park (see below). There is built development on three sides and a number of established buildings on the fourth. Therefore the development would be ‘infill’ development that could be incorporated into the existing surrounding built form without any westward incursion into the countryside beyond the existing built form of the business park.



- Today, Lambourn Business Park (to the east and south of the site) is established as a location for office / industrial and storage use and designated as a Protected Employment Area in the Council’s Local Plan. The proposed site benefits from an extant planning permission (11/01822/OUTMAJ) for commercial development but remains vacant (see approved layout below). The approved buildings are single storey and do not make efficient use of the site. The site has been marketed but commercial development is not viable at the current time. However, the planning permission remains ‘extant’ which means it could be built in the future if market forces change.



- Up until now the site has been underutilised, considering its historic use and long-established planning consent for redevelopment. Aside from the site’s position within a designated AONB there are no other known constraints to development. The site is positioned within an established business park with an extant planning consent for commercial development and is not considered to make a positive contribution to the AONB.
- Through a landscape-led approach to layout, scale, density and design the development offers the opportunity to make a positive impact on the landscape.
- Buffer planting will serve to soften and screen the development from the adjacent business park and surrounding landscape alongside additional opportunities to ‘green’ the site through play and drainage features.
- The proposals seek to deliver up to 25 new homes (see sketch below). The development would offer a range of housing types and tenures, informed by local housing needs. It would include affordable housing.



- Mixed use development would add vitality to the business park, particularly at evenings and weekends. Night-time activity would naturally add security and safety to the business park. None of the existing activities at the business park would preclude adjacent residential development.
- Access would be provided via the existing and retained business park to the east, along the Public Right of Way which dissects the site.
- The site could come forward independently or as part of a wider site incorporating land to the west (which already has some limited buildings) within the plan period, subject to the needs of existing businesses currently located on the site. As part of the wider site, this could deliver a meaningful contribution to the housing targets for this spatial area with limited impact on the AONB.
- The site (including the wider site) is within a single ownership and is available immediately for development.

Allocation of this site within Policy SP15 of the Local Plan will accord with emerging policy SP1 of the Local Plan on the basis that the site benefits from an extant planning permission and is therefore tantamount to previously developed land, it represents an opportunity to make a positive impact on the landscape and AONB and would make efficient use of the land (unlike the extant planning permission).

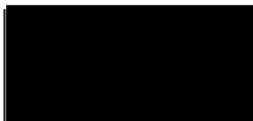
In order to ensure that the Local Plan is effective and justified, and ultimately sound, this site should be included within Policy SP15 the Local Plan as a non-strategic site allocation in the North Wessex AONB.

If the Council and / or appointed Inspector wanted to consider a larger housing allocation then our client would be open to considering residential development on the wider site in their ownership (see attached location plan showing the proposed site in red and wider land ownership in blue).

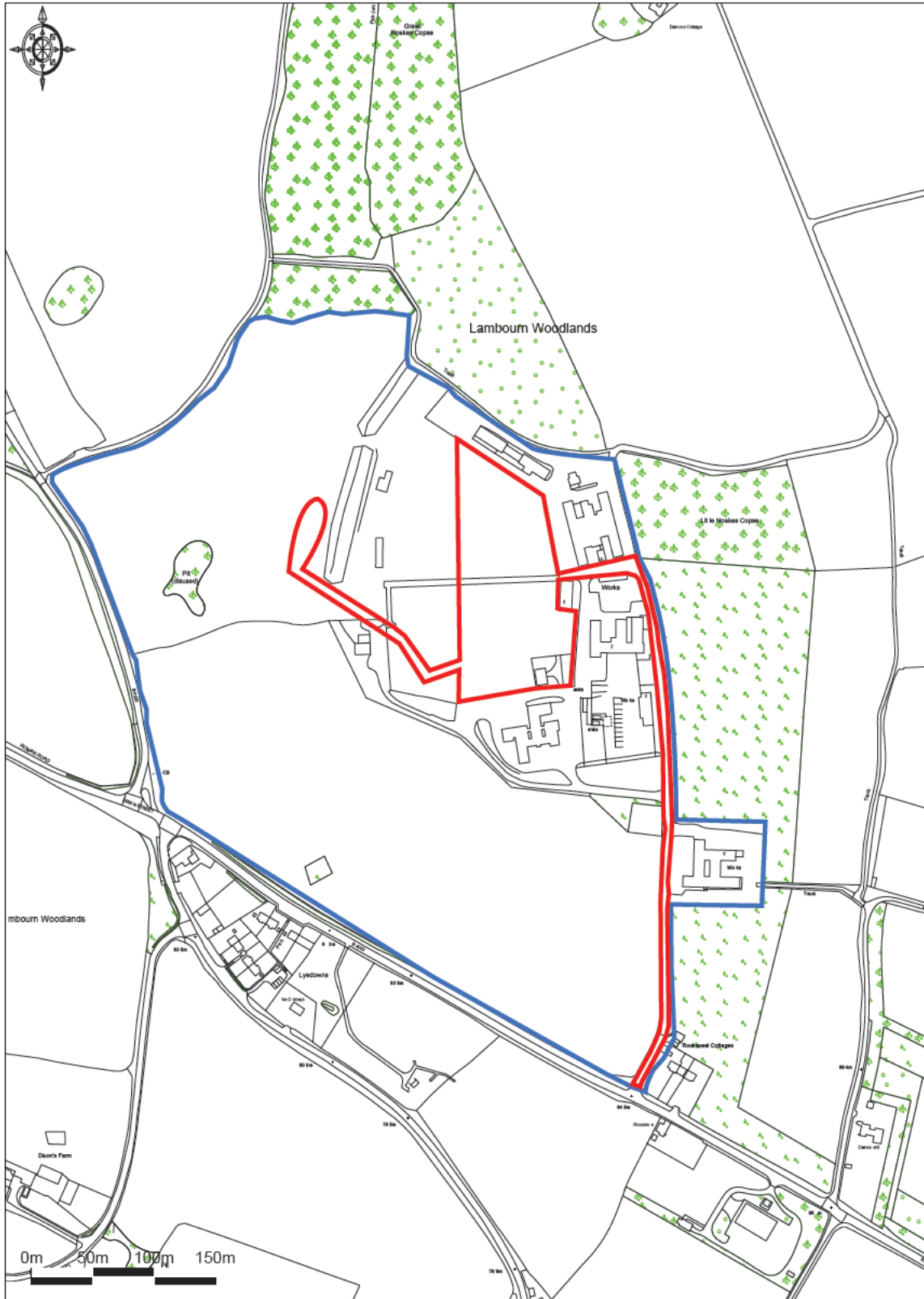
We request to be kept informed as the plan progresses and would like to participate in the Examination Hearing sessions to ensure our client's case is fully understood.

Please do let us know if you have any queries or would like to discuss.

Yours sincerely

A solid black rectangular box used to redact the signature of Catherine Mason.

Catherine Mason
Associate Director



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Project Lowesden Works Business Park	LPA West Berkshire Council	Indigo Planning Limited Swan Court Worple Road London SW19 4JS	
Title Site Location Plan	Date: 04.10.11 Project No: 645035 Drawing No: 645035/SLP	Drawn by: CC Scale: 1:5000	
Client RGB Communications & Lambourn Property Investments LLP		T 020 8605 9400 F 020 8605 9401 info@indigo-planning.com	

- KEY**
- Site Boundary
 - Ownership Boundary