

Planning Policy Team
Development and Regulation
West Berkshire District Council
Market Street
Newbury
RG14 5LD

Date: 3rd March 2023

Dear Sir / Madam

Representations | Local Plan Review 2022-2039 Proposed Submission

This Representation is prepared by Knight Frank, on behalf on Limes Leisure Investments LLP, the landowner of the site comprising Nuffield Health, Newbury, RG14 7PN ('the site').

It is submitted in response to the West Berkshire Local Plan Review 2022-2039 Proposed Submission consultation published in January 2023 ('draft Local Plan').

In general, we support the preparation of the new Local Plan for West Berkshire and our comments to the consultation aim to help create a sound Local Plan. This is in respect of the four tests of soundness set out in National Planning Policy Framework ('NPPF') Para 35 including being: a) positively prepared, b) justified, c) effective, and d) consistent with national policy.

The following is set out below:

- The site;
- Development opportunity; and
- Comments on policies / sections of the draft Local Plan.

The Site

The site is located within Newbury (within the urban area) and is approx. 1.7 miles from the town centre. It is approx. 1.5 hectares (3.6 acres) in size and is rectangular in shape. It comprises a 4,552 sqm (49,000 sqft) modern health and fitness club. It is currently occupied by Nuffield Health. It is the equivalent of approximately 2-3 storeys in height. The remainder of the site is used for surface car parking (240 spaces).

The site is brownfield land / previously developed land, and close to the town centre, Newbury Racecourse Station (within 800m) and Newbury Station (within 1500m) and the road network (M4 Junction 13 and A4/A34/A339).

Potential Development Opportunity

The site clearly represents an excellent future development opportunity. Most significantly it is previously developed land, located within Newbury urban area, and forms part of the CS2 Newbury Racecourse strategic site allocation. Therefore, the sustainability and suitability of the site is not in question.

The site could be redeveloped to provide future residential development, of a similar scale to neighbouring new development which is between 6-9 storey.

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Such proposals would be in conformity with national policy which promotes the effective use of land and a focus on previously developed land.

Comments on policies / sections of the draft Local Plan

Appendix 7 Schedule of policies to be superseded / deleted

The draft Local Plan proposes to not carry forward site allocation policies from the West Berkshire Core Strategy 2006-2026 and Housing Site Allocations DPD 2006-2026. These policies include “CS2 *Newbury Racecourse strategic site allocation*”. This proposed deletion is also referenced in the Sustainability Appraisal (Para. 5.3.2.1).

The draft Local Plan explains the policies are not carried forward “*as they have either been built out or are nearing completion.*”

In terms of planning status, the site has outline consent for 1,500 new dwellings, in accordance with the policy, however not all of the reserved matters applications have come forward. Therefore, we suggest that it is not built out or nearing completion.

The sustainability and suitability of the site for future development is not in question, and therefore we suggest that as a location for future development it is not discounted by the new Local Plan. It could also deliver additional growth in the future e.g. at the Nuffield Health site. The site is deliverable and suitable for future development.

We recommend that through the Local Plan the Council does not prevent future development at the “racecourse” site. By adopting this approach the Local Plan would be positively prepared and consistent with national policy, as it would make effective use of land (previously developed land).

Section 4 Development Strategy

Under Policy SP1, we support the spatial strategy which “optimises the use of previously developed land”.

Under Policy SP3, we support the proposed settlement hierarchy. Future development should be focused in urban areas, especially Newbury.

By adopting this approach, the Local Plan would be positively prepared and consistent with national policy, as it would make effective use of land (previously developed land).

Section 6 Delivering Housing

Under Policy SP12, we support the position that the housing target set out in the draft Local Plan “does not constitute a ceiling or cap to development”.

In terms of windfall sites, we recommend that a range of sites should be considered to constitute windfall sites and should not just be limited to small sites.

In terms of housing supply, we recommend that a complete housing supply table is prepared as currently shown Table 2 does not add up to the total housing target.

By adopting this approach, the Local Plan would be positively prepared and consistent with national policy, as it would make effective use of land.

Section 12 Development Management Policies

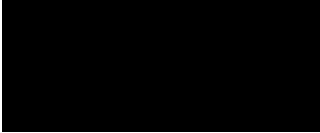
Under Policy DM39, we recommend that a site specific approach to community facilities (in terms of loss of) is adopted by the Council in the new Local Plan. This would allow for development opportunities to respond better to current / changing market conditions and demand for development.

By adopting this approach, the Local Plan would be positively prepared and consistent with national policy, as it would make effective use of land.

Conclusion

In conclusion, we would be happy to discuss any of the above comments with you, including the site opportunity.

Yours sincerely



Roland Brass
Partner

