

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

Ref:

(For official use only)

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

This form has two parts:

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

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:		Mr
First Name:*		Gareth
Last Name:*		Johns
Job title <i>(where relevant):</i>		
Organisation <i>(where relevant):</i>		Pro Vision
Address* <i>Please include postcode:</i>		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address:*		garethj@pro-vision.co.uk
Telephone number:		01962 677044

*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 obo Newbury Racecourse Plc.
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	Chapter 3 – Vision and objectives Paragraph 3.2 - Vision Strategic Objective 2: Housing
Policy:	
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		X
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

The Vision confirms that the Council will make available “...**housing of different types, sizes, tenures and affordability will be a priority** in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability” [our emphasis]. The ‘Housing’ objective explains that a key objective of the Plan is to meet its’s housing need by providing a range of housing, including affordable housing.

Please see accompanying statement for our full representations. In brief, the housing target is insufficient to boost the supply of housing and provide flexibility, address affordability and need for affordable housing in the district and the housing supply would likely lead to a housing shortfall below the LHN, particularly due to reliance on windfall sites and the large strategic sites.

As such, the Council’s strategic policies of the Local Plan (i.e. Policy SP12 and the strategic site allocations etc.) do not currently deliver the Plan’s vision and objectives and are unsound.

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.

There is justification 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). 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. As such, the LPR should be allocating more sites for housing over the plan period that is consistent with the broad spatial strategy.

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:

We wish to appear at the examination to present our evidence and technical information to support these representations

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.

Signature	Gareth Johns	Date	02/03/2023
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First Name:*		Gareth
Last Name:*		Johns
Job title <i>(where relevant):</i>		
Organisation <i>(where relevant):</i>		Pro Vision
Address* <i>Please include postcode:</i>		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address:*		garethj@pro-vision.co.uk
Telephone number:		01962 677044

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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.

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Your name or organisation (and client if you are an agent):	Pro Vision obo Newbury Racecourse Plc.
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	Paragraphs 6.1 to 6.25
Policy:	Policy SP12: Approach to Housing Delivery
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		X
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see accompanying statement for our full representations.

In summary, 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;
- significantly below the Council’s aspirations to achieve and address the affordability problem / affordable housing need within West Berkshire;
- does not take account of potential unmet need from neighbouring authorities (particularly from Reading) given the changes in local housing needs; and
- The buffer is too low, given the level of constraint and variables in the district that affect delivery of new homes, and taking account of the level of available sites in identified in the HELAA.

In addition, there is concern that the Council expected housing supply is not sufficient to meet the minimum LHN and will lead to a significant housing shortfall across the plan period.

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.

In summary, 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.

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:

We wish to appear at the examination to present our evidence and technical information to support these representations

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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
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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	Gareth Johns	Date	02/03/2023
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Title:		Mr
First Name:*		Gareth
Last Name:*		Johns
Job title <i>(where relevant):</i>		
Organisation <i>(where relevant):</i>		Pro Vision
Address* <i>Please include postcode:</i>		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address:*		garethj@pro-vision.co.uk
Telephone number:		01962 677044

*Mandatory field

Part B – Your Representation

Please use a separate sheet for each representation

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Your name or organisation (and client if you are an agent):	Pro Vision obo Newbury Racecourse Plc.
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	Policy SP13: Sites allocated for residential and mixed-use development in Newbury and Thatcham
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		X
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please refer to our accompanying statement for our full representations.

Our assessment of the housing requirement and supply demonstrates that there is a need to allocate additional housing sites that is consistent with the broad spatial strategy.

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).

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Please see accompanying statement for our full representations.

There is a need to allocate additional housing sites. Accordingly, we are of the view that the Council should reconsider allocation our clients' site at 'land adjacent New Road, Newbury', in addition to other sites that have been overlooked, for allocation in the Local Plan Review. There are no significant technical, physical, or environmental constraints that would prevent development of the site and its delivery.

The specialist evidence indicates that the Council's conclusions in regard to ancient woodland are not well founded and, therefore, the site should be re-considered for allocation in the Plan.

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:

We wish to appear at the examination to present our evidence and technical information to support these representations

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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

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

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Signature	Gareth Johns	Date	02/03/2023
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Your name or organisation (and client if you are an agent):	Pro Vision obo Newbury Racecourse Plc.
---	--

Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	Policy SP16: Sandleford Strategic Site Allocation
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?

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Please tick all that apply:

NPPF criteria	Yes	No
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Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see accompanying statement for our full representations.

It is considered that the housing delivery of 1,580 dwellings at Sandleford Park during the plan period is questionable.

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.

In brief, it is considered that the Council should take a cautious approach with the delivery of Sandford Park during the plan period. The Regulation 18 Consultation on the LPR noted that Sandford Park was expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR's development strategy.

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:

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Your name or organisation (and client if you are an agent):	Pro Vision obo Newbury Racecourse Plc.
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	Policy SP17: North East Thatcham Strategic Site Allocation
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)

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Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see accompanying statement for our full representations.

In summary, it is considered that the housing delivery of 1,500 dwellings at NE Thatcham during the plan period is questionable. Further evidence is required to justify the allocation, particularly given the reduction to 1,500 new homes and the potential lack of delivery of a secondary school.

The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years and a realistic average annual build out rate is c.100-120 dpa.

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

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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.

The justification for the allocation of NE Thatcham is questioned. Notwithstanding this, the timescales and annual rate of completions is not supported and appears overly optimistic. As a result, it is considered that the delivering completions from 2031/32 at 120 dpa would equate to, at best, 960 dwellings over the plan period from NE Thatcham.

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:

We wish to appear at the examination to present our evidence and technical information to support these representations

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.

Signature	Gareth Johns	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.

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

Ref:

(For official use only)

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

This form has two parts:

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

PART A: Your Details

Please note the following:

- *We cannot register your representation without your details.*
- *Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.*
- *All information will be sent for examination by an independent inspector*
- *All personal data will be handled in line with the Council's Privacy Policy on the Development Plan. You can view the Council's privacy notices at <http://info.westberks.gov.uk/privacynotices>*

	Your details	Agent's details (if applicable)
Title:		Mr
First Name:*		Gareth
Last Name:*		Johns
Job title <i>(where relevant):</i>		
Organisation <i>(where relevant):</i>		Pro Vision
Address* <i>Please include postcode:</i>		The Lodge, Highcroft Road, Winchester, SO22 5GU
Email address:*		garethj@pro-vision.co.uk
Telephone number:		01962 677044

*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 obo Newbury Racecourse Plc.
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Please indicate which part of the Local Plan Review this representation relates to:

Section/paragraph:	
Policy:	
Appendix:	Appendix 8: Housing Trajectory
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		X
Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence		X
Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground		X
Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF		X

Please give reasons for your answer:

Please see accompanying statement for our full representations.

The housing trajectory likely to lead to a shortfall of housing across the plan period due to reliance on windfall sites and large strategic sites (e.g Sandford and NE Thatcham) that are questionable in terms of their deliverability and overly optimistic assumptions about delivery rates.

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.

The housing trajectory will need to be updated given the need to allocate additional sites for housing over the plan period. It is also considered that the Plan at Appendix 8 should include the individual phasing of sites to assist monitoring.

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:

We wish to appear at the examination to present our evidence and technical information to support these representations

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.

Signature	Gareth Johns	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.

WEST BERKSHIRE LOCAL PLAN REVIEW

Land south of Newbury Racecourse

Representation on Regulation 19 Consultation on the proposed submission West Berkshire Local Plan Review 2022 – 2039 (dated January 2023)

Prepared by Pro Vision on behalf of Newbury Racecourse Plc.

March 2023

LAND SOUTH OF NEWBURY RACECOURSE

WEST BERKSHIRE LOCAL PLAN REVIEW

PROJECT NO. 2299

PREPARED BY:

GARETH JOHNS MRTPI

ASSOCIATE DIRECTOR

CHECKED BY:

JAMES ILES MRTPI

DIRECTOR

DATE:

MARCH 2023

PRO VISION

THE LODGE,
HIGHCROFT ROAD,
WINCHESTER,
SO22 5GU

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APPENDICES

Appendix A - Site Location Plan

Appendix B - Illustrative Masterplan

1.0 Introduction

1.1 This representation is made on behalf of Newbury Racecourse Plc. in relation to land in their sole ownership at 'Land south of Newbury Racecourse (HELAA Ref: GRE3)'. It is in response to West Berkshire's Regulation 19 Consultation on the proposed submission version of the West Berkshire Local Plan Review (LPR) to 2039.

1.2 The Racecourse's land has an area of approximately 13.47 hectares and has previously been promoted for development through the Council's Call for Sites, LPR 'Issues and Options' Consultation undertaken in November 2018 and 'emerging draft' LPR Consultation concluding in February 2021. The Council's HELAA (Dec 2020) concluded that the Site is 'potentially developable in part'. However, the Council's Updated HELAA (Jan 2023) now identifies that the Site is 'not developable within the next 15 years'.

1.3 This representation is supported by the following documents:

- Proposed Submission Local Plan Review Comment Forms (relating to the 'Vision and Objectives', Policy SP12, Policy SP13, Policy SP16, Policy SP17 and Appendix 8: Housing Trajectory);
- Site Location Plan prepared by Pro Vision (Appendix A);
- Illustrative Masterplan prepared by Pro Vision (Appendix B); and
- Landscape and Visual Impact Assessment prepared by WH Landscape (enclosed separately);

1.4 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:

- 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’.

1.5 In summary, having looked at the evidence base behind the LPR, we consider that the proposed development strategy, including the housing strategy, is flawed in that it is unlikely to deliver as the Council predicts, and that opportunities to identify a more robust delivery strategy have been missed.

1.6 Therefore, we consider that a number of the aspects of the LPR are unsound and require changes to the Plan. As such, we have provided some recommended changes under each section below.

2.0 Delivering Housing

Introduction

- 2.1 Policy SP12 explains that provision will be made for 8,721 to 9,146 net additional homes for the period 1st April 2022 to 31st March 2039. It is acknowledged that the target figure of 538 dwellings per annum (dpa) does not constitute a ceiling or cap to development.
- 2.2 The target figure of 538 dpa is a 5% uplift on the local housing need (LHN), as calculated using the standard method.
- 2.3 However, it is considered that there is clear justification for higher housing growth in West Berkshire to meet the level of need identified in the evidence, not least in respect of addressing affordability.

The Housing Requirement

1) The Duty to Co-operate

- 2.4 The Council, at paragraphs 6.5 to 6.8 of the Plan, note that there is a current unmet need from Reading Borough Council of around 230 dwellings up to 2036 and that there will be a need to consider any further unmet need given the housing needs generated by the standard method (i.e. the 35% uplift to Reading as one of the largest urban areas in England).
- 2.5 The Council also notes that the distribution of any unmet need has not been agreed and will be subject to a further review through the plan making process before the need arises.
- 2.6 Reading has identified that a five year review of its Plan is required by 2024. This will need to include an urban capacity assessment. A revised future unmet need figure is therefore likely to be available shortly. It is anticipated that the future unmet need from Reading will be significant – the housing requirement increases to 907 dpa from Lichfield’s analysis of the standard method for local housing need, dated April 2022 (from 689 dpa in the current Reading Borough Local Plan). However, at this stage without further evidence there is no certainty on what the unmet need will be or how it will be redistributed. However, it is widely accepted that Reading has limited land capacity to deliver these additional housing requirements in full and, therefore, highly likely that neighbours, including West Berkshire will be required to deliver in meeting some of this unmet need.

- 2.7 To address this expected significant future unmet need from Reading, it is considered that the Plan should include additional flexibility to address this future unmet need.
- 2) Affordable Housing and Affordability Uplift
- 2.8 The Vision at Chapter 3 of the Plan states that the Council will ensure that delivering “...**housing of different types, sizes, tenures and affordability will be a priority** in order to provide West Berkshire residents with homes and environs at sustainable locations in towns and villages that meet their needs, whatever their income, stage of life and ability” [our emphasis].
- 2.9 The Updated Housing Needs Assessment (dated, July 2022) prepared by Icení (on behalf of the Council) confirms that there is a “*notable need for affordable housing, and it is clear that provision of new **affordable housing is an important and pressing issue across the District***” [our emphasis]. The conclusion adds that “*the evidence does however suggest that **affordable housing delivery should be maximised where opportunities arise***” [our emphasis].
- 2.10 The report advises that the scale of affordable housing need is 697 dpa (a 188% increase on need following the Council’s Housing Needs Assessment in 2020). This is also 136% of the standard method minimum LHN. Accordingly, the report advises that theoretically if 40% of all new housing delivered was for affordable housing around 1,740 dpa would be needed to meet West Berkshire’s affordable housing need in full (paragraph 3.24). The Council’s affordable housing position is clearly worsening.
- 2.11 It is acknowledged that the delivery of housing in line with the standard method figure may over time improve the affordability of market housing (and thus reduce affordable housing needs) through the affordability uplift in the standard method. However, West Berkshire’s past housing delivery rates have generally been in line - if not greater - than the current minimum LHN and yet affordability problems/affordable housing need remains pressing. As a result, not positively addressing the affordability problems and affordable housing need across West Berkshire in this plan period could have significant social and economic consequences which do not appear to have been appropriately considered, including in the Sustainability Appraisal (SA/SEA) for Policy SP12.
- 2.12 For this reason, the calculation of affordable housing need supports an increase in the overall housing requirement. Further, the current proposed level of housing is not aspirational and will not help the Council deliver its Local Plan ‘Vision’. The Council’s Vision provides the

context of the Local Plan and, therefore, we observe that the strategic policies and housing requirements do not deliver these principles of the Plan and it will inevitably fail in meeting this key priority.

3) The Buffer/Uplift

- 2.13 The Council provide for a 5% buffer/uplift on the minimum LHN. The Council argue that this is to boost supply and have some built-in flexibility.
- 2.14 The Council should be concerned that limiting the housing supply to only a 5% buffer will significantly restrict the delivery of new homes and therefore, amongst other issues, will further raise house prices to levels which create cost barriers to local residents and workers. There are many factors and variables that can affect housing supply, especially in such a constrained district, therefore there is clear justification for a significantly larger buffer. And the recent phosphates issue associated with the River Lambourn is a recent example of unforeseen issues affecting delivery of new homes.
- 2.15 In addition, an appropriate buffer will support greater flexibility in the Plan if the anticipated housing supply does not deliver. This is considered further at Section 3 below.
- 2.16 An appropriate uplift to the housing requirement is likely to fall between 10-20%. This would increase the Council's target housing requirement to 564 - 616 dpa, which would equate to finding a supply of 9,588 – 10,472 dwellings up to 2039. This follows the approach in other recently adopted Local Plans, including South Oxfordshire (c. 27% buffer), Maidenhead (c. 12% buffer), and North Herts (c. 13% buffer). Further, the draft Wokingham Local Plan currently includes a 20% buffer.
- 2.17 The Regulation 18 version of the West Berks LPR included a 10% buffer/uplift. However, it is noted by the Council in the Housing Background Paper that they reduced this figure to 5% 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). This appears to be counter-intuitive; the greater level of constraint, the greater level of buffer is required to provide greater prospect of meeting the housing need, especially where one of the Plan's priorities is to improve affordability. Furthermore, the SA/SEA undertakes an analysis, at Appendix 4 Section 2.1, between LHN+ 5% and LHN+ 10%. The LHN + 10% scores significantly better with 'overall positive, with some significantly positive effects'. However, the SA/SEA concludes at Table 26 of the report that this would put the rural nature of the district at undue

pressure. The SA/SEA therefore takes forward a flawed approach that does not fit with the objectives of the Plan.

2.18 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. 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, internationally protected habitats 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 the buffer, particularly as there is clear evidence of many more available sites in the HELAA to accommodate further growth.

Conclusion

2.19 Overall, it is considered that the level of housing currently proposed is:

- a) insufficient to support the Government's objective of significantly boosting the supply of housing;
- b) significantly below the Council's aspirations to achieve and address the affordability problem / affordable housing need within West Berkshire;
- c) does not take account of potential unmet need from neighbouring authorities (particularly from Reading) given the changes in local housing needs; and
- d) The buffer is too low, given the level of constraint and variables in the district that affect delivery of new homes, and taking account of the level of available sites in identified in the HELAA.

2.20 It is considered that this justifies 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.

2.21 Accordingly, the Council's housing target does not meet the following tests for soundness: positively prepared, effective or consistent with national policy.

3.0 Meeting Housing Need

Housing Supply

- 3.1 The Framework, at paragraph 11 b), confirms that “*strategic policies should, as a minimum, provide for objectively assessed needs for housing...*”. The LPR identifies several sources of housing supply across the plan period at Table 2 of the Plan. These include: retained allocations; existing commitments on unallocated sites; windfall sites; and through new allocations in the Local Plan Review and Neighbourhood Plans.

Existing allocations

- 3.2 The history of some of these sites identified in the supply that do not currently have planning permission (around 95 units, excluding Sandleford Park West) or only have outline permission (392 units, excluding Sandleford Park East) or where a site’s delivery has been continually delayed clearly does not support confidence in their timely delivery. As such, it is considered that a 10% non-implementation rate is factored in to, at least, some of this supply would provide a more robust strategy

Non-allocated Sites with planning permission

- 3.3 Table 2 shows that nearly 1,958 dwellings are provided on un-allocated sites (including prior approvals) with planning permission. Again, a 10% non-implementation rate should be applied to this figure to provide a more robust strategy as it is unlikely that all these permissions will be delivered.

Windfall allowance

- 3.4 The housing supply includes a windfall allowance of 1,949 dwellings (or 26.6% of the total housing supply) up to 2039. It has been based on the average annual delivery on small sites of less than 10 units (excluding prior approvals for permitted development) between 2006 – 2022.
- 3.5 However, it is recommended that the Council remove or significantly reduce this windfall allowance to provide greater surety of supply through allocations and without having to rely on the use of a windfall allowance which by its nature is uncertain. The latest consultation on the revised Framework and the draft Levelling Up and Regeneration Bill also place a greater emphasis and need to provide a genuinely plan-led system.

- 3.6 The Council contend that delivery of windfalls has been consistent and reliable. The Council has not provided any evidence however about future supply to justify such an approach. There also appears to be a recent trend that opportunities for windfalls are reducing on small sites. As set out at Table 3.1 of the Housing Background Paper the delivery over the last three years 2019/20 to 2021/22 has reduced to an annual average of 97 completions. Indeed, in the last five years the annual average is also only 112 completions, notably lower than LPRs anticipation of 140 dpa.
- 3.7 In addition, it is also worth noting the windfall allowance is taken from smaller sites (i.e. less than 10 new homes) and, therefore, a reliance on sites for potentially between 1-4 dwellings in the housing supply will not deliver any affordable housing and further exacerbate affordable housing need within West Berkshire, contrary to the LPR's priority to improve affordability of housing for its existing and future residents.
- 3.8 As a result, the windfall allowance of around 140 dpa should be removed completely or significantly reduced given recent trends.
- 3.9 The implications of this are important. Even a relatively modest but more realistic reduction to 100 dpa would reduce immediately the total housing supply by, at least, 549 dwellings. The remedy is for more positive planning by taking forward more of the available sites from the HELAA. This will reduce the reliance on windfall sites and provide greater surety of supply through allocations and improve overall affordable housing provision.

Future Supply

- 3.10 Notwithstanding the above comments regarding housing supply, the Plan explains that there is a need to identify sites for a further 1,809 dwellings to meet the 538 dpa target (or 9,146). The Plan allocates some 1,720 homes (which includes 1,500 at NE Thatcham) and a further 80 dwellings to come forward through Neighbourhood Plans.

Housing Trajectory

The Council are already slightly (9 dwellings) short of their housing target figure (LHN + 5%) rather than ahead of the target. However, it is considered that the housing trajectory during the plan period is unrealistic, particularly relating to the strategic allocations.

Sandleford Park (as allocated at Policies SP13 and SP16)

- 3.11 The Housing Background Paper, at Appendix 2, sets out the housing trajectory including the phasing of individual sites. The Council contend that Sandleford East (which benefits from outline planning permission) will begin delivering 100 dpa from 2025/26 through to 2034/35, with 80 dwellings provided during the year 2035/36.
- 3.12 This appears an optimistic timetable, particularly given the previous planning delays with the site (allocated in 2012), that a reserved matters application has yet to be submitted for any phase(s) and the need to address several planning conditions prior to commencement of construction. The start date of 2025/26 for first completions therefore seems very much a 'best case scenario'.
- 3.13 It is understood that the site is being delivered by a single housebuilder. This therefore could lead to a lower absorption rate due to lack of variety of housing product in accordance with the findings of Letwin's Independent Review of Build Out (October 2018). The 100 dpa across the plan period therefore is likely to be impractical and affect site delivery over the plan period.
- 3.14 With regards to Sandleford West, this site does not have any planning permission despite an outline application being submitted in April 2018. It appears that the Council are awaiting an amended package of information and revised plans. Therefore, first completions in 2027/8 is simply conjecture. There will also be a need to submit and agree reserved matters and address conditions ahead of that time.
- 3.15 With the above in mind, it is considered that the Council should take a cautious approach with the delivery of Sandleford Park during the plan period. The Regulation 18 Consultation on the LPR noted that Sandleford Park was expected to deliver 1,000 dwellings across the plan period. This seems a more robust figure than the 1,580 dwellings now proposed, and a more realistic basis for the LPR's development strategy.

North East Thatcham (as allocated at Policies SP13 and SP17)

- 3.16 The Council has reduced the delivery of NE Thatcham from a total of 2,500 dwellings to 1,500 dwellings. Notwithstanding this, the Council anticipate that NE Thatcham will deliver 1,500 homes over the plan period (compared to 1,250 dwellings expected at the Regulation 18 stage). For reasons we discuss below, this appears to be unjustified.

The justification for NE Thatcham

- 3.17 The supporting evidence base for NE Thatcham - including the Thatcham Strategic Growth Study (which includes a Vision and Concept Plan) - still refer to the delivery of 2,500 homes and has not been updated to reflect the position in the current version of the LPR. This also includes the Viability Testing which tested 2,300-2,500 new homes. This work would need to be updated for any Plan to be found sound.
- 3.18 There is also some uncertainty whether the Council is actually proposing additional housing at NE Thatcham beyond the plan period given the evidence base still refers to 2,500 new homes and the site allocation boundary remains the same. Furthermore, the evidence base includes the 'West Berkshire Strategic Vision 2050' in accordance with paragraph 22 of the Framework (requiring local plans to look beyond the plan period where they include larger scale developments). However, the LPR includes no reference to this strategic vision.
- 3.19 The site allocation policy also still refers to the delivery of the secondary school. However, there is no updated viability appraisal to confirm that this is deliverable for a site of 1,500 new homes in total. This raises the following concerns:
- The Thatcham Growth Study (Stage 3) acknowledges that strategic development at this scale (i.e. 2 500 new homes) is the only approach that is likely to deliver an additional secondary school for the town, without which any growth would cause issues in provision.
 - Again, the Thatcham Growth Study (Stage 3) notes that the scale of development (i.e. 2,500 new homes) would not create the need for a secondary school development on its own and, therefore, is only half-funded by developer contribution. A reduction to 1,500 new homes is therefore likely to increase this funding gap further, with no indication of how this additional funding will be resolved.
 - A secondary school would internalise a significant number of trips from the proposed development. Indeed, the Access and Movement Report for NE Thatcham in the Thatcham Growth Study (Stage 3) assumes that the secondary school will have 50% internal trips. Therefore, with question marks over the potential delivery of a secondary school for a site of 1,500 new homes, the sustainability credentials of NE Thatcham are uncertain.

3.20 As a result, the identification of NE Thatcham is not potentially justified as there is a distinct lack of evidence to support the allocation of NE Thatcham for 1,500 new homes and consideration of other reasonable alternatives. In particular, the lack of delivery of a secondary school and reduction in housing numbers would take away the key justification for growth at this location to help deliver new education provision and additional community infrastructure. The SA/SEA, at Appendix 4, acknowledges this but the Council still proceed on this basis as it is considered that 2,500 new homes in Thatcham is too many.

Scale and timescales for Housing Delivery

3.21 Notwithstanding the above, the Council's assumptions on the expected housing supply from NE Thatcham are also clearly unreasonable.

3.22 The Housing Background Paper demonstrates that the Council expect NE Thatcham to start delivering 150 dpa from 2029/30 to 2038/2039. On the face of it, this appears to be overly optimistic.

3.23 The market evidence demonstrates that for schemes of 1,500 dwellings, the lead-in time from validation of an application through to first completions is approximately 7 years (Source: Lichfield's Start to Finish (2nd Edition), dated February 2020). As such, given the timescales for the adoption of the Plan (i.e. late 2024 in the LDS) and taking a view that the planning application for this site is submitted by the end of 2024/2025, first completions cannot be projected before 2031/2032. This timescale may be optimistic given there is a need to prepare and agree to a coherent masterplan or development framework, if prior mineral extraction is required and/or there are delays to the adoption of the Plan. In addition, as noted with Sandleford Park, the Council has a previous poor record of delivering strategic sites within their expected timescales.

3.24 Furthermore, market evidence suggests that for sites of 1,500, a realistic average annual build out rate is c.100-120 dpa (Source: Lichfield's Start to Finish (2nd Edition)). As such, delivering completions from 2031/32 at 120 dpa would therefore equate to, at best, 960 dwellings over the plan period. A shortfall of 540 dwellings.

Conclusion

3.25 The Housing Background Paper, at Table 3.4, sets out the housing supply and future supply for the Council during the plan period. The table below sets out a comparison with our analysis and findings above:

Supply Category	Net units outstanding (the Council's figures)	Net units outstanding (our analysis of the Council's figures in comparison)
Local Plan retained allocations		
Sandleford Park	1,580	1,000 (-580)
Housing Site Allocations DPD	990	942 (-48)
<i>Subtotal:</i>	2,570	1,942 (-628)
Neighbourhood Plan Allocation		
Stratfield Mortimer	82	82
Local Plan allocations not being retained (due to site being at an advanced stage of construction)		
Newbury Racecourse	465	465
Housing Site Allocations DPD	256	256
<i>Subtotal</i>	721	721
Existing planning commitments on unallocated sites	1,958	1,763 (-195)
Existing planning commitments for C2 Use Class communal accommodation	57	57
New allocations within the LPR	1,720	1,180 (-540)
Sites to be allocated within neighbourhood plans	80	80
Small site windfall allowance to 2039	1,949	1,400 (-549)
Total	9,137	7,225 (-1,912)

- 3.26 With the above in mind, it is considered that currently the Council's housing supply is not sufficient to meet the minimum LHN (8,721 dwellings). Indeed, even by just discounting the expected housing shortfall from NE Thatcham during the plan period, this would decimate any headroom built in by the 5% buffer/uplift and the Council's housing supply would fail to meet the minimum LHN ($9,137 - 540 = 8,597$).
- 3.27 Accordingly, the Council's approach to housing delivery does not meet the following tests for soundness: positively prepared, effective or consistent with national policy.
- 3.28 As a result, it is concluded 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 HELAA including at 'land south of Newbury Racecourse' have been overlooked. The level of housing shortfall (potentially around 2,363 - 3,247 dwellings when providing a 10 - 20% buffer to the LHN in accordance with comments at Section 2) is substantial and, therefore, should be addressed through allocations in this Plan rather than any early/immediate review of the Local Plan, which would be to defer difficult, strategic planning decisions rather than demonstrating positive planning now.

4.0 Land South of Newbury Racecourse and Site Assessment

- 4.1 In the context of these concerns about the vulnerability of the submitted development strategy, and the obvious remedy to identify a greater yield of new homes from the available sites in the HELAA, we turn to our client's land which has been overlooked ('Land south of Newbury Racecourse (HELAA Ref: GRE3)')
- 4.2 The Council's HELAA (Dec 2020) concluded that the Site is 'potentially developable in part'. However, the Council's Updated HELAA (Jan 2023) now identifies that the Site is 'not developable within the next 15 years'. There has been no obvious change in assessment of the site which justifies this change in status. We disagree with this revised assessment/conclusion for the reasons set out below.
- 4.3 Accordingly, we are of the view that the Council should include our client's land, in addition to other sites that have been overlooked, for allocation in the Local Plan Review (the Racecourse site alone is unlikely to remedy the issues we have identified).
- 4.4 The capacity of the site is around 160-170 dwellings. However, subject to further assessment (e.g. tree surveys) the capacity of the site could be greater. The evolution of the Masterplan has been landscape-led and informed by a comprehensive Landscape and Visual Impact Assessment (LVIA). Consequently, the proposed layout reduces the area of built development and enhances the existing green infrastructure to further integrate the development into the immediate and wider landscape.
- 4.5 An Illustrative Masterplan, at Appendix B, demonstrates how the development of the site could accommodate around 161 dwellings, as suggested by the Council. The proposed development will respect the edges of the surrounding woodland and the significant trees within the site. It avoids development on the more steeply sloping parts of the site and makes adequate provision for surface water attenuation. The aim is to integrate the development within its setting with pedestrian links to create a permeable environment.

Suitability of GRE3

- 4.6 The Council's HELAA document concludes that the '*there is low capacity for development due to the site being constrained by in a number of ways where any development would affect views and characteristics which would cause harm to the landscape. The Assessment therefore*

recommends that the site is not developed for housing.' In respect of this, we comment as follows:

4.7 A comprehensive LVIA, prepared by WH Landscape Consultancy Ltd accompanies these representations and were previously submitted to the Council as part of the consultation on the 'emerging draft' LPR in 2021. The LVIA assess the existing landscape to determine and describe the conditions against which changes resulting from the development can be measured or predicted and assessed. In response to the landscape conclusions of the Council's Site Assessment, the LVIA demonstrates that:

- Overall, the development will have an overall Moderate – Moderate/Minor effect, which is not considered significant under the LVIA methodology.
- There will be some localised benefits in respect of the enhancement of the current green infrastructure within and around the site. These benefits will be further enhanced by the proposed additional green infrastructure.

4.8 The HELAA identifies no 'showstoppers' that would prevent the delivery of the site for housing, including on heritage, ecology, drainage, traffic, air quality and the sustainability of the site.

Availability of GRE3

4.9 The site is available for a residential development immediately. The site is within the sole control of the Racecourse which will facilitate its timely development.

Achievability of GRE3

4.10 The site is considered to be 'achievable' (as defined in the HELAA Methodology 2016) for the reasons set out below:

- A primary access is achievable from Mandarin Drive/ Rosyth Gardens. The Racecourse's land extends to the highway boundary in this location and, therefore, an access from this location can be implemented. A secondary southern access can also be achieved from Greyberry Copse Road (albeit the technical evidence considers that this is not essential). An agreement has, in principle, been agreed with the landowner and the Racecourse expect to conclude a formal access agreement shortly allowing the secondary access if required.

- The site is greenfield - therefore it is likely that there are no significant constraints (such as contamination) which would preclude development of the site on viability grounds.
- The Racecourse have ample experience in selling sites to developers and delivering development at Newbury. There is also developer interest in the site.

Summary

4.11 There are no insurmountable constraints that would prevent the delivery of the 'Land south of Newbury Racecourse (Ref: GRE3)' for development. The site is therefore suitable, available and achievable for residential development which can help West Berkshire meet the identified housing need in a timely and sustainable manner. Accordingly, we are of the view that the Council should re-consider our client's site for allocation in the Local Plan Review.

5.0 Conclusion

5.1 Newbury Racecourse Plc. has concerns that the Council's Local Plan Review is currently unsound having regard to the tests of soundness at paragraph 35 of the Framework.

5.2 It is considered that there are a number of matters that indicate that the proposed strategy is not robust and, therefore, liable to fail in its objectives. There is justification to increase the housing requirement, to address these issues including:

- The Plan's priority to improve affordability and to deliver additional affordable homes;
- The need to boost supply significantly and to build in greater flexibility in the Plan if the anticipated housing supply does not deliver; and
- Unmet need from neighbouring authorities (e.g Reading);

5.3 With the above in mind, 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.

5.4 In addition, the Council's housing supply would fail to meet the minimum LHN. This is particularly due to reliance on windfall sites and large strategic sites (e.g Sandleford Park and NE Thatcham) that are questionable in terms of timescales for housing delivery and annual rate of completions. The Council's justification for the allocation NE Thatcham is also not warranted, particularly given the lack of updated evidence and reduction in housing numbers.

5.5 As a result, and noting the significant amount of available land in the HELAA that has been overlooked, it is concluded that the remedy is for the LPR is to allocate more sites for housing over the plan period, consistent with the broad spatial strategy i.e. focusing development on the most sustainable settlements, including Newbury, in accordance with the settlement hierarchy (Policy SP3/Table 1 District Settlement Hierarchy).

5.6 Accordingly, we are of the view that the Council should consider 'land south of Newbury Racecourse', in addition to other sites that have been overlooked in suitable locations, for allocation in the Local Plan Review. We contend that the site is suitable, available and achievable and therefore the Council has been premature and unjustified in declaring it

undevelopable over the plan period. Its allocation would, in principle, be consistent with the settlement hierarchy.

- 5.7 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 the West Berkshire Local Plan Review.

Appendix A – Site Location Plan

SITE LOCATION PLAN

Key

 Site Boundary
13.47 ha



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REV.	DATE	AMENDMENTS	DRAWN	CHECKED
#	29.03.17		CD	JP

CLIENT:
Newbury Racecourse PLC

PROJECT:
Land South of Newbury Racecourse

DRAWING:
Site Location Plan

DATE:
March 2017

SCALE: 1:2500 @ A3

DWG NO: 2299/SK00

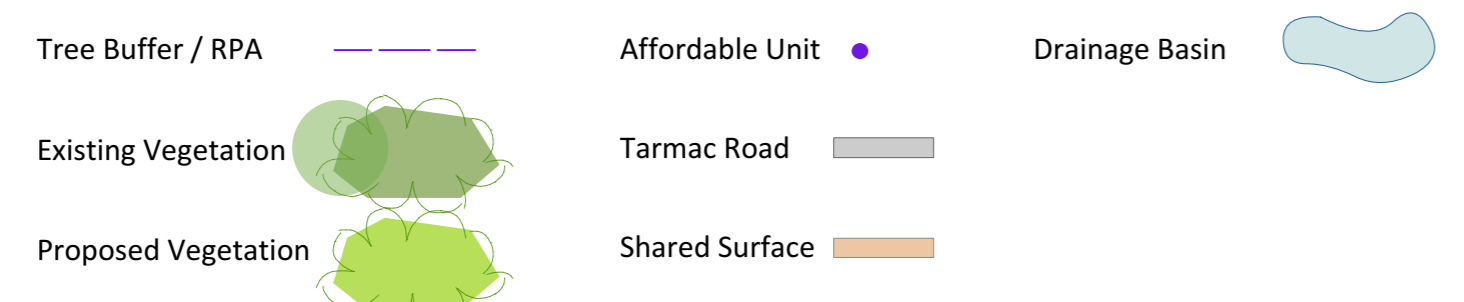
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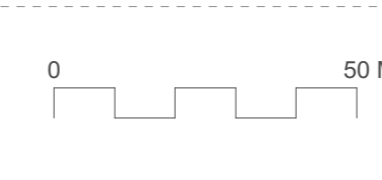
www.pro-vision.co.uk



Appendix B – Illustrative Masterplan



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REV	DATE	AMENDMENTS	DRAWN	CHECKED
1	2021.01	Issue for planning application	MD	MD
2	2021.01	Issue for planning application	MD	MD
3	2021.01	Issue for planning application	MD	MD

CLIENT:
Newbury Racecourse

PROJECT:
Land South of Newbury Racecourse

DRAWING:
Illustrative Masterplan

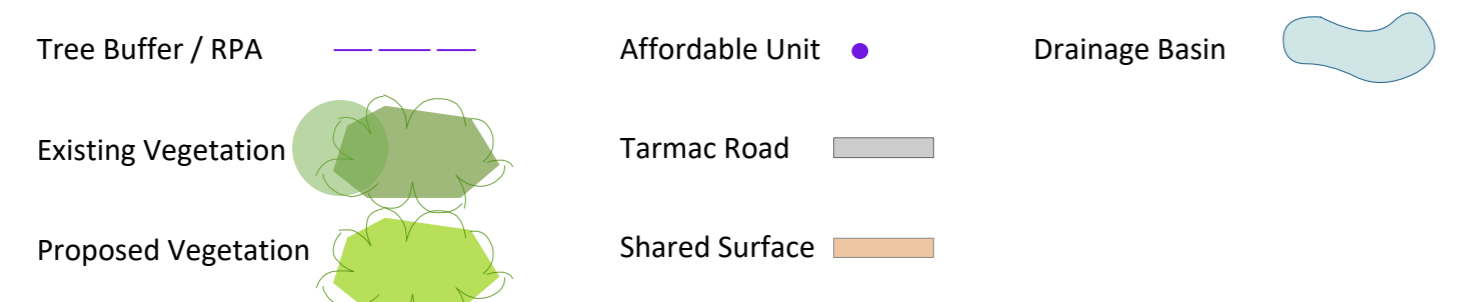
DATE:
January 2021

SCALE: 1:1250
SIZE: A1
JOB NO: 2299
DWG NO: SK1-01
REV: 8

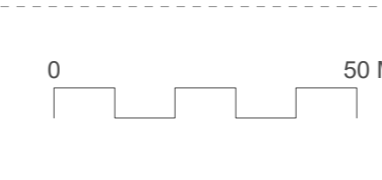


APPENDICES

APPENDIX 1: DRAFT ILLUSTRATIVE SITE PLAN



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REV	DATE	AMENDMENTS	DRAWN	CHECKED
1	2021.01	Issue for planning	MD	MD
2	2021.01	Issue for construction	MD	MD
3	2021.01	Final version and design team added	MD	MD

CLIENT:
Newbury Racecourse

PROJECT:
Land South of Newbury Racecourse

DRAWING:
Illustrative Masterplan

DATE:
January 2021

SCALE: **1:1250**
 SIZE: **A1**
 JOB NO: **2299**
 DWG NO: **SK1-01**
 REV: **B**



APPENDIX 2: VIEWPOINT PHOTOGRAPHS



VP: 1

Viewpoint direction: East

Approximate distance from site: 15m

Taken by: TA

Photograph date: October 2020

OS map elevation: 90m AOD



VP: 2	Viewpoint direction: North-east	Approximate distance from site: Adjacent
Taken by: TA	Photograph date: October 2020	OS map elevation: 110m AOD



VP: 3

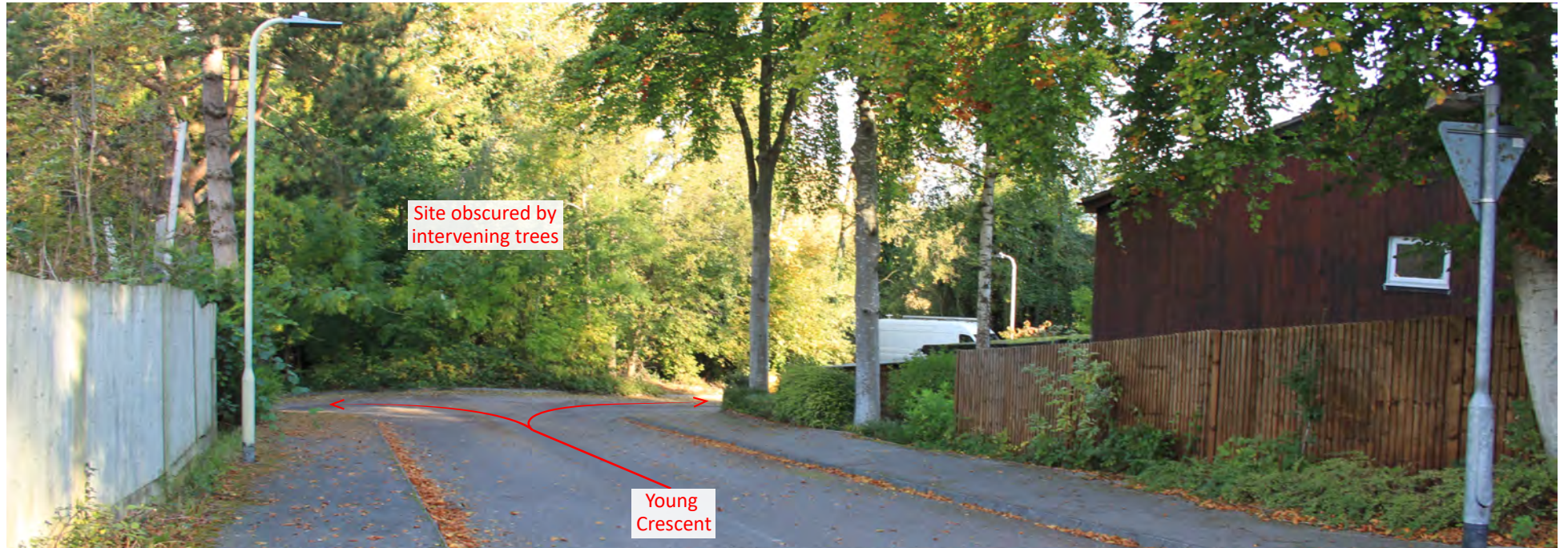
Viewpoint direction: North-east

Approximate distance from site: 50m

Taken by: TA

Photograph date: October 2020

OS map elevation: Between 115-120m AOD



Site obscured by
intervening trees

Young
Crescent

VP: 4

Viewpoint direction: North

Approximate distance from site: 50m

Taken by: TA

Photograph date: October 2020

OS map elevation: Between 95-100m AOD



VP: 5

Viewpoint direction: North

Approximate distance from site: 25m

Taken by: TA

Photograph date: October 2020

OS map elevation: 100m AOD



VP: 6	Viewpoint direction: North	Approximate distance from site: 25m
Taken by: TA	Photograph date: October 2020	OS map elevation: Between 90-95m AOD



VP: 7

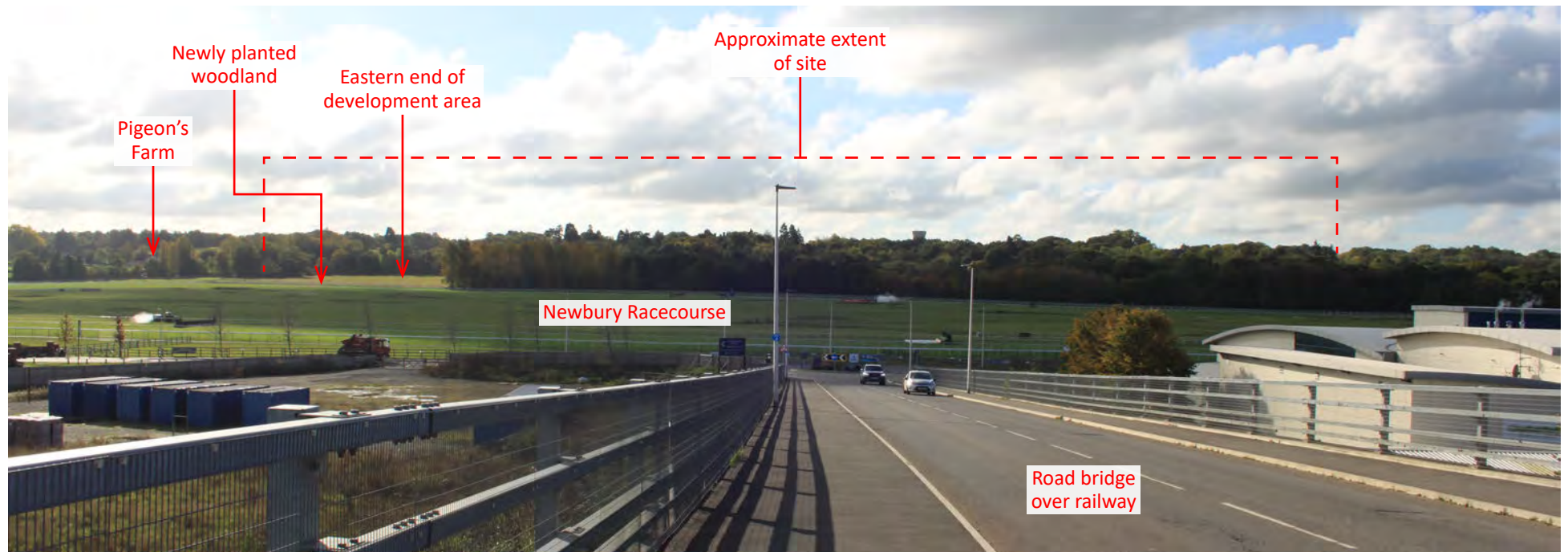
Viewpoint direction: South-east

Approximate distance from site: 1015m

Taken by: TA

Photograph date: October 2020

OS map elevation: N/A - On a bridge over a railway



VP: 8

Viewpoint direction: South

Approximate distance from site: 650m

Taken by: TA

Photograph date: October 2020

OS map elevation: N/A - On a bridge over a railway



VP: 9

Viewpoint direction: South-west

Approximate distance from site: 605m

Taken by: TA

Photograph date: October 2020

OS map elevation: Between 70-75m AOD



VP: 10

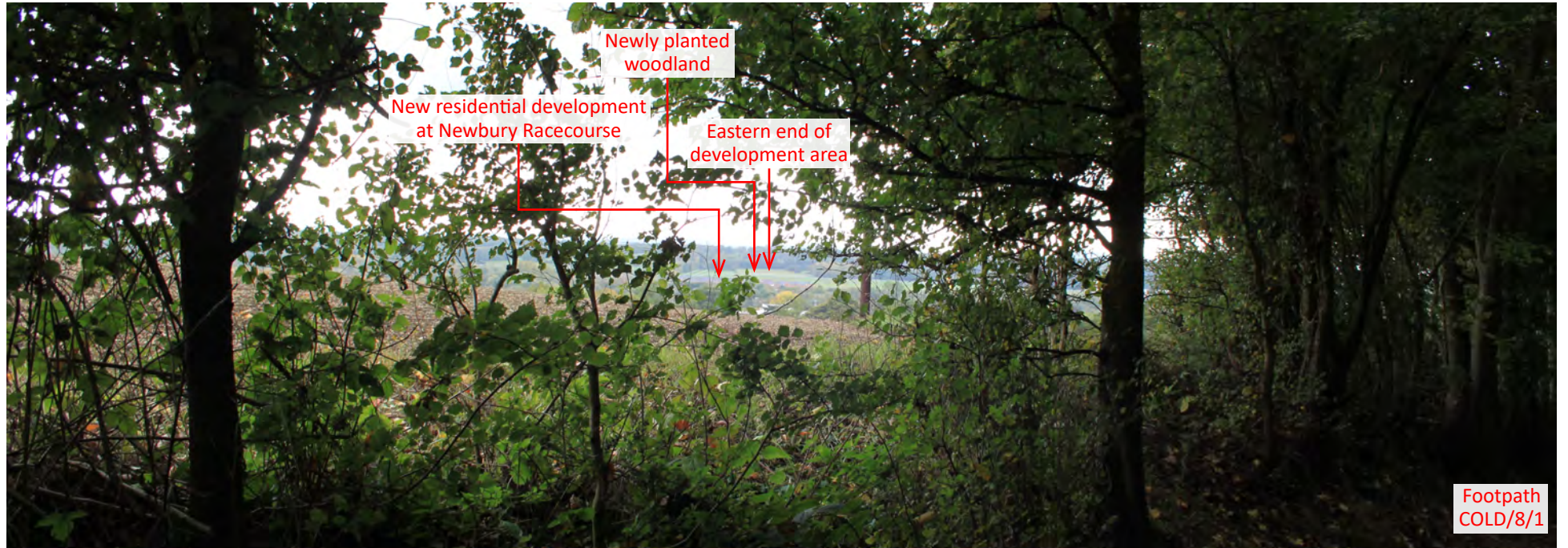
Viewpoint direction: West

Approximate distance from site: 695m

Taken by: TA

Photograph date: October 2020

OS map elevation: Between 70-75m AOD



VP: 11

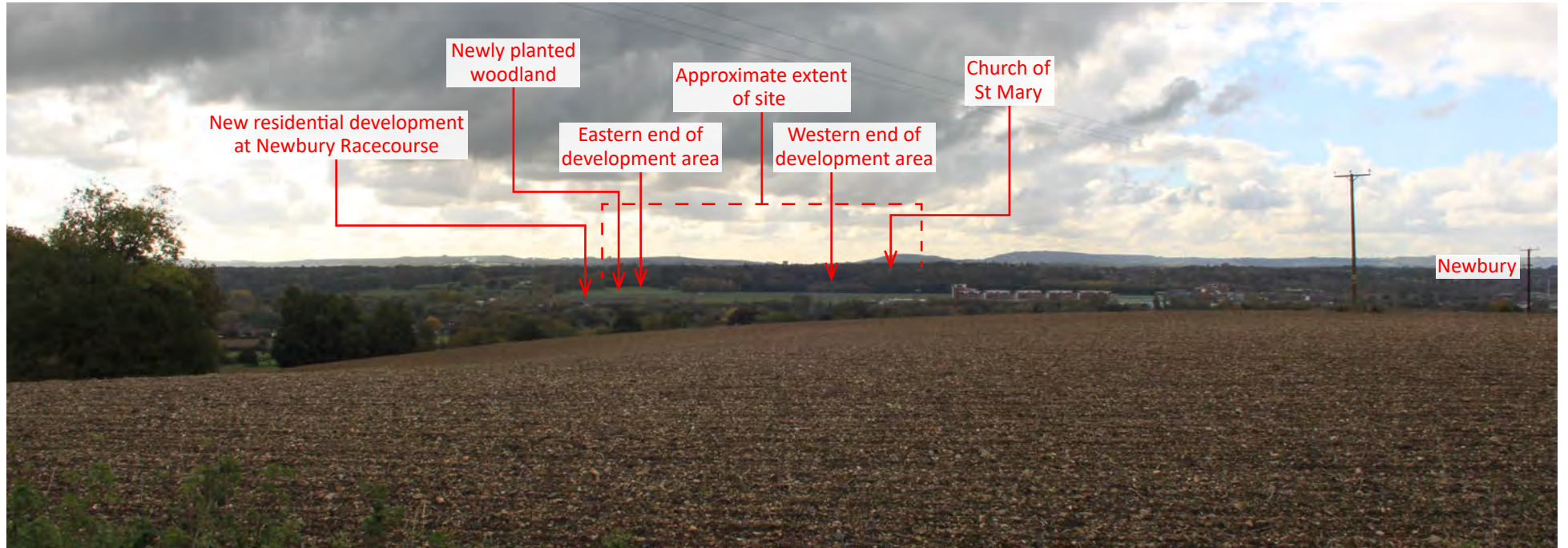
Viewpoint direction: South

Approximate distance from site: 2540m

Taken by: TA

Photograph date: October 2020

OS map elevation: 130m AOD



VP: 12

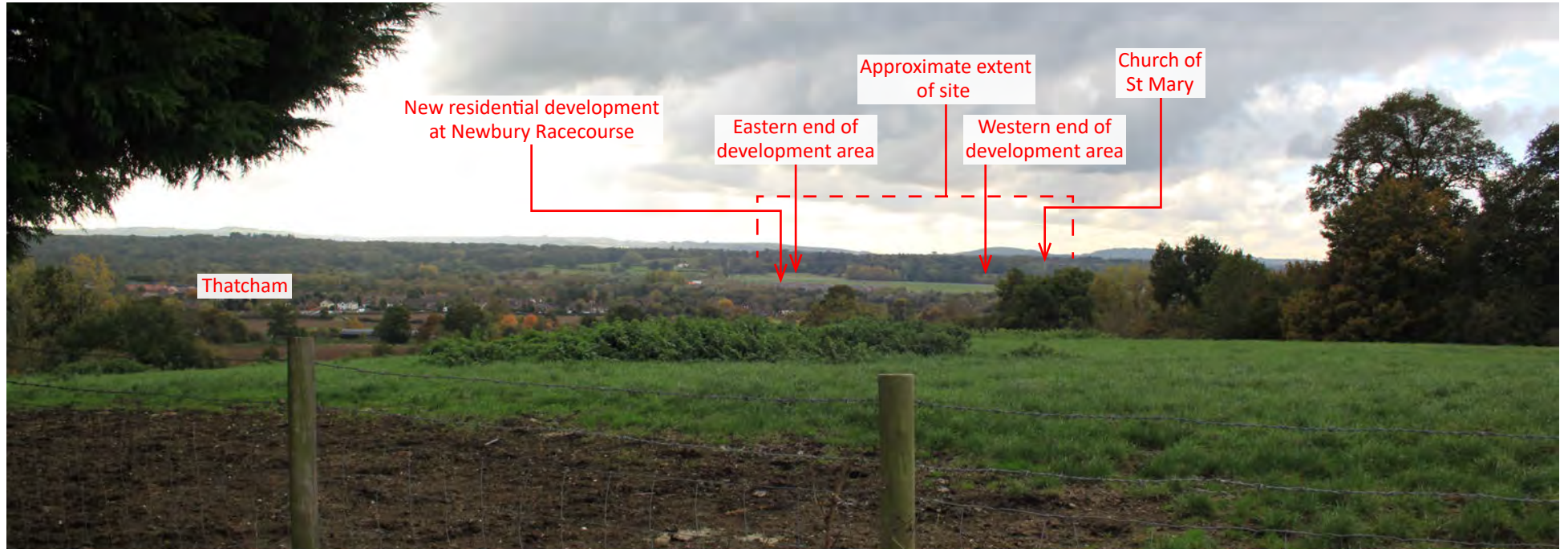
Viewpoint direction: South

Approximate distance from site: 2595m

Taken by: TA

Photograph date: October 2020

OS map elevation: Between 130-135m AOD



VP: 13a

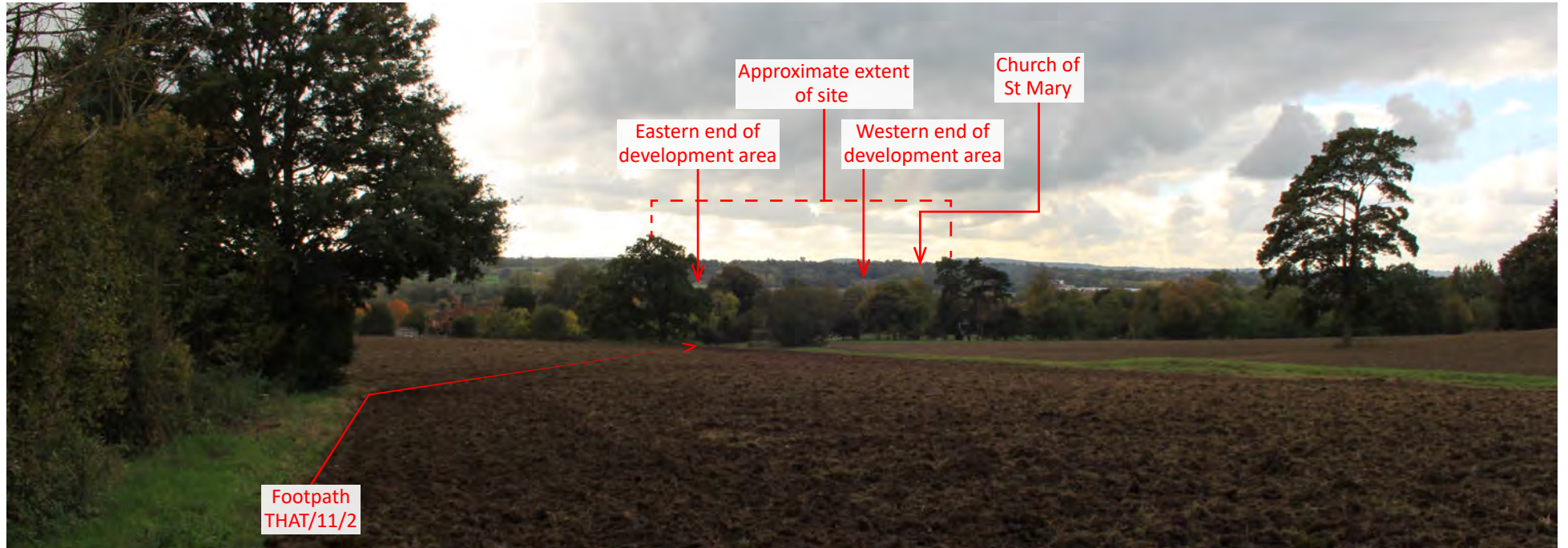
Viewpoint direction: South

Approximate distance from site: 2585m

Taken by: TA

Photograph date: October 2020

OS map elevation: Between 125-130m AOD



VP: 13b

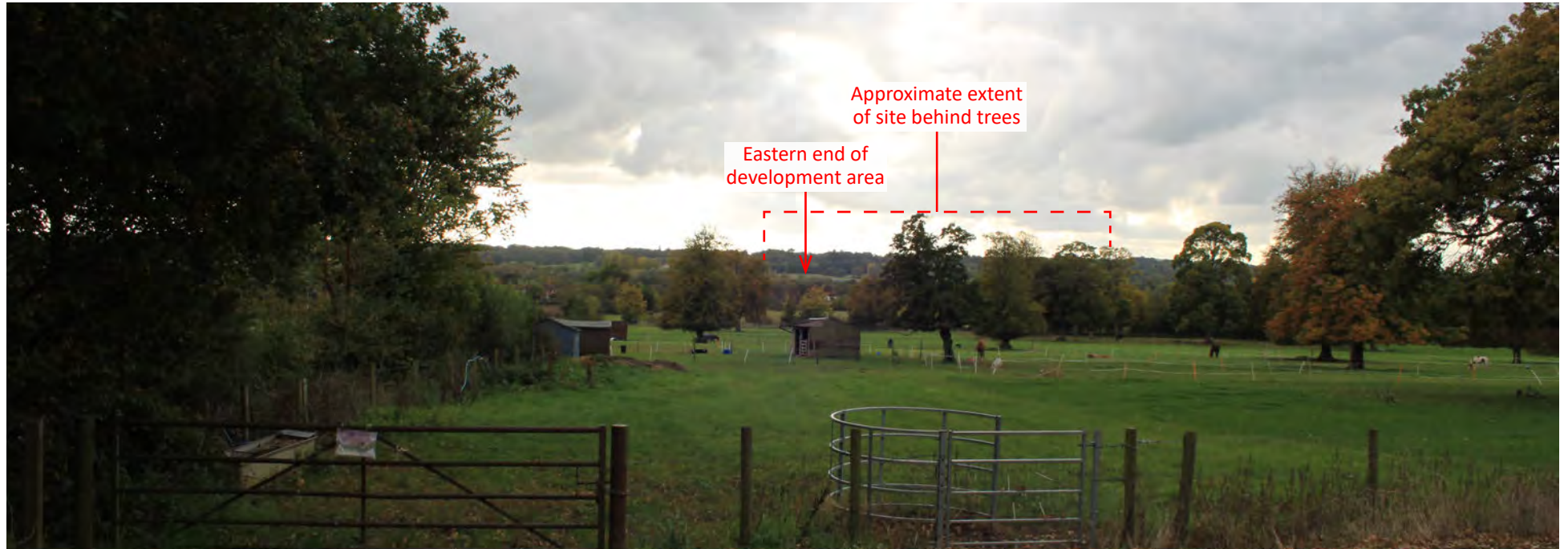
Viewpoint direction: South

Approximate distance from site: 2405m

Taken by: TA

Photograph date: October 2020

OS map elevation: 110m AOD



VP: 13c

Viewpoint direction: South

Approximate distance from site: 2135m

Taken by: TA

Photograph date: October 2020

OS map elevation: 95m AOD



VP: 14

Viewpoint direction: South-west

Approximate distance from site: 3520m

Taken by: TA

Photograph date: October 2020

OS map elevation: Between 105-110m AOD



VP: 15

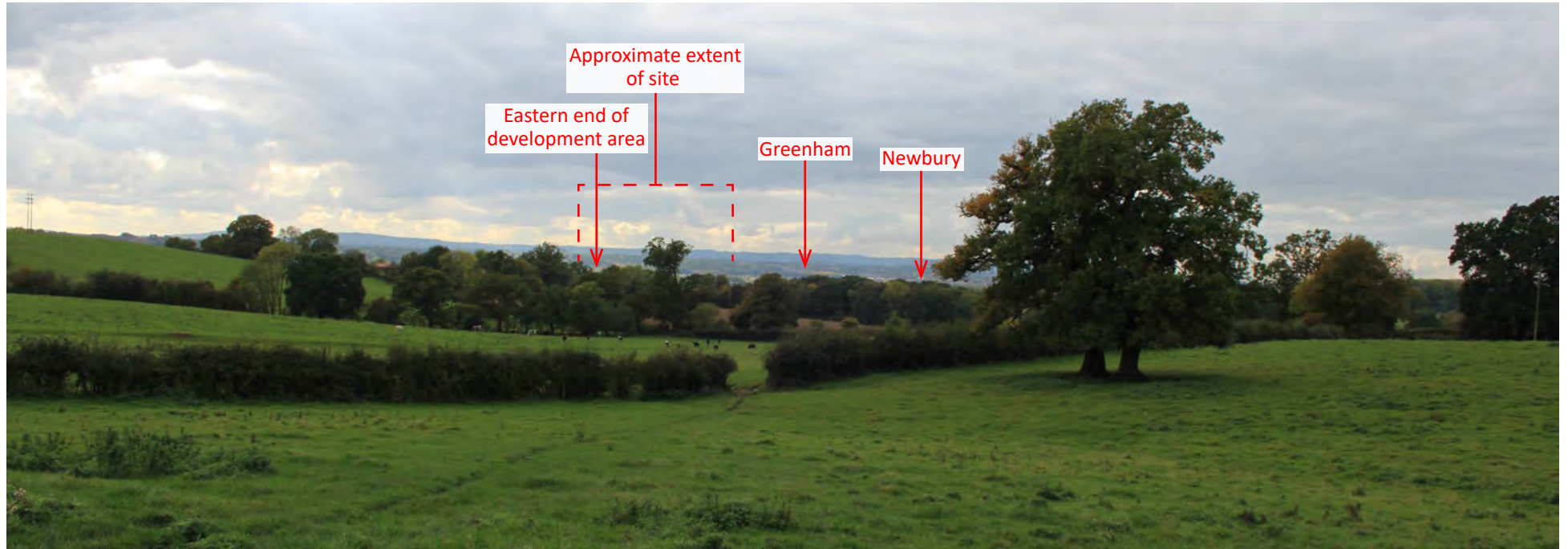
Viewpoint direction: South-west

Approximate distance from site: 3610m

Taken by: TA

Photograph date: October 2020

OS map elevation: 115m AOD



VP: 16

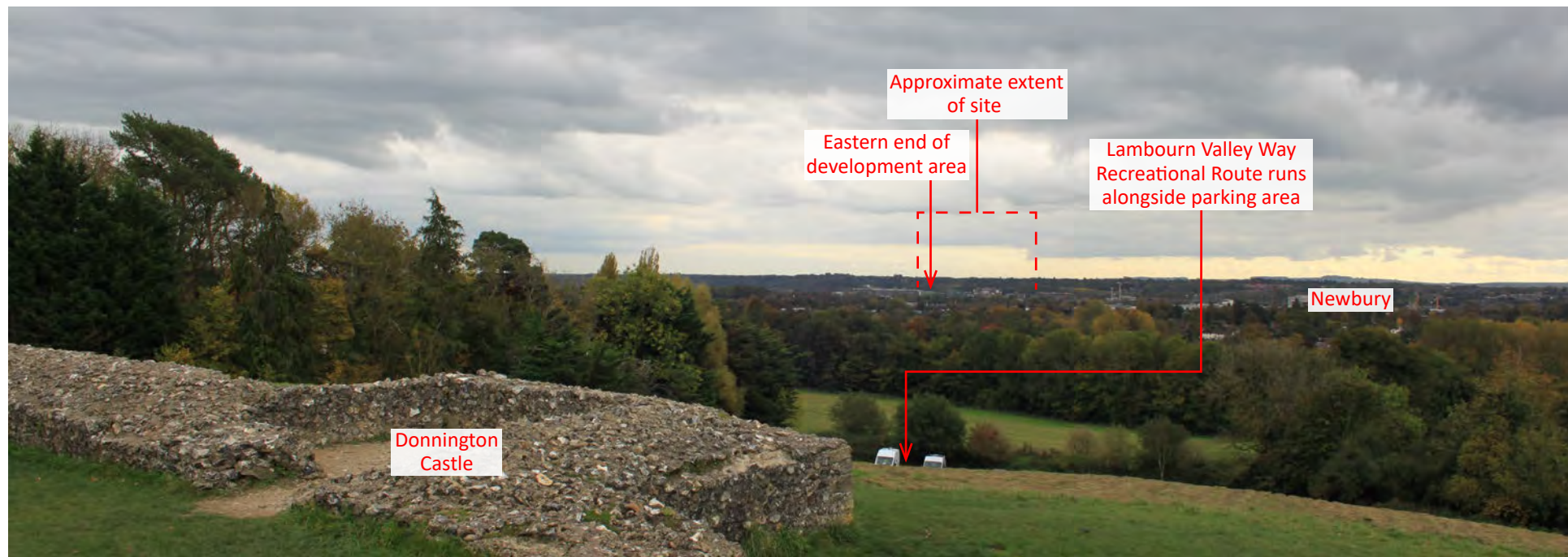
Viewpoint direction: South-west

Approximate distance from site: 4170m

Taken by: TA

Photograph date: October 2020

OS map elevation: 125m AOD



VP: 17

Viewpoint direction: South-east

Approximate distance from site: 4035m

Taken by: TA

Photograph date: October 2020

OS map elevation: 125m AOD