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Subject: Representations to the Main Modifications: Local Plan Review (Ref: 1274515)
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Good afternoon

Please see attached the representations to the Main Modifications consultation on behalf of Donnington New Homes.

Kind regards

Kimberley

KIMBERLEY PARRY [REDACTED]
ASSOCIATE



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Town and Country Planning Act 1990 (As Amended)

West Berkshire Local Plan Review

Proposed Main Modifications: Local Plan Review 2022-2039

Representations on Behalf of: **Donnington New Homes (Ref: 1274515)**

January 2025



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1. Introduction

- 1.1 Neame Sutton is instructed by Donnington New Homes to prepare representations to the proposed main modifications (MM) (November 2024) to the West Berkshire Local Plan Review 2022-2039, in accordance with the requirements of the main modifications' (MM) consultation process.
- 1.2 To avoid repetition, as a member of the North East Thatcham Partnership (NET), Donnington New Homes endorses the representation submitted on behalf of the NET Partnership.
- 1.3 These representations address the main modifications pursuant to the requirements of developers.

2. Proposed Main Modifications (November 2024)

MM3: Policy SP1

- 2.1 Whilst Donnington Homes supports a density policy to ensure the efficient use of land, they are of the opinion that the proposed densities set out in Policy SP1 (Spatial Strategy) may not be appropriate (20dpha to 70dpha, depending on the location).
- 2.2 MM3 proposes the introduction of a 20dpha density on sites within the AONB/Natural Landscapes which is still considered relatively restrictive given the potential requirements for sites allocated in the respective Neighbourhood Plans, particularly when considered together with the need for landscape-led design and the requirements of Policies SP18 (Housing Type and Mix), DM31 (Residential Amenity and Gardens) and DM44 (Car Parking and Cycle Storage) and their respective requirements for the use of the Nationally Described Space Standards (NDSS), M4(2) and M4(3) standards, cycle and bin storage, mix of homes, parking and EV charging points, as well as the now mandatory BNG, and the need to utilise renewable sources of energy.
- 2.3 The densities proposed together with the development control criteria outlined above, may impact the type, size and tenure of homes provided, resulting in the Council being unable to provide an appropriate housing mix across West Berkshire, and the homes that are being delivered, unable to satisfy the need of the district.
- 2.4 Donnington New Homes considers that the minimum net densities should be reduced, and that flexibility be included in relation to density to allow the site requirements to be considered individually and in the context of their allocations.

MM5: Supporting Text to Policy SP2

- 2.5 Donnington New Homes supports the insertion of the proposed new paragraphs, which recognise that sites that meet the requirements of the allocation in Neighbourhood Plans will be considered in accordance and consistent with the development plan and national policy.

MM18: Policy SP12

- 2.6 Given the clear need to increase the housing requirement, Donnington New Homes supports the allocation of 55 dwellings to Hungerford, which, as a Rural Service Centre, is capable of accommodating growth, and provides the opportunity to deliver sites early in the plan period. Hungerford benefits from a good range of key services and opportunities for employment, community, and education. It is accessible and has regular public transport services to a range of destinations.

[MM28: Policy SP19](#)

- 2.7 Whilst it is recognised that the Council are seeking to maximise the opportunities to deliver affordable housing, it is considered that this policy should accurately reflect national policy and not apply a blanket approach to all areas.

[MM75: Policy DM4](#)

- 2.8 Whilst Donnington New Homes is dedicated to sustainable design and development, Policy DM4 is considered aspirational and does not acknowledge the practical implications of the requirements set out, for example, the first paragraph states that new dwellings should achieve net zero operational carbon emissions, including both regulated and unregulated energy. It is unclear as to how unregulated energy will be controlled or monitored and places an onerous obligation on both the developer and future resident.

[MM90: Policy DM30 and Supporting Text](#)

- 2.9 Donnington New Homes support high-quality design and the positive impact that this can have on people's quality of life and wellbeing, however, given that there is no evidence to suggest that the introduction of the NDSS into policy will improve the quality of housing delivered, nor any evidence to suggest that homes below the NDSS aren't meeting residents' needs, it is not considered that additional space necessarily equates to an improvement in quality and as such, Donnington New Homes support the removal of this policy, which will provide sufficient flexibility to allow smaller development schemes to be delivered with well-designed residential units and ensure that development is viable.

[MM92: Supporting Text to Policy DM31](#)

- 2.10 Paragraph 132 (p.40) of the National Design Guide highlights that balconies can enhance outdoor amenity and provide a degree of privacy and separation from public space. In some case it may be that, with the densities being sought, a site cannot accommodate the full amenity space requirement through communal space but is able to contribute or offset the shortfall through private amenity space by way of balconies. It is, therefore, supported that balconies do constitute acceptable forms of amenity space.