

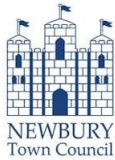
From: [REDACTED]
To: [REDACTED]
Subject: Newbury Town
Date: 30 January 2025 16:13:55
Attachments: [REDACTED]

This is an EXTERNAL EMAIL. STOP. THINK before you CLICK links or OPEN attachments.

Dear Sir/Madam

Please find attached the response from Newbury Town Council to the LPR.

Regards



TOBY MILES-MALLOWAN
Chief Executive Officer
Newbury Town Council

[REDACTED]
[REDACTED]
[REDACTED]

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**West Berkshire Local Plan Review 2022-2039 (LPR)
 Consultation on Proposed Main Modifications
 (6 December 2024 – 31 January 2025)**

Representation Form

Ref:
 (For official use only)

Please complete and return this form:	By email: [REDACTED]
	By post: Planning Policy, Development and Housing, Council Offices, Market Street, Newbury, RG14 5LD
Return by:	11:59pm on Friday 31 January 2025

Please read the **Guidance Note**, available on the Council’s website <https://www.westberks.gov.uk/lpr-proposed-main-modifications>, before making your representations.

This form has two parts:
 PART A – Your details
 PART B – Your representation(s)

Please complete a new form for each representation you wish to make.

<u>PART A: Your details</u>		
<i>Please note the following:</i>		
<ul style="list-style-type: none"> <i>We cannot register your representation without your details.</i> <i>Representations cannot be kept confidential and will be available for public scrutiny, however, your contact details will not be published.</i> 		
	1. Your details	2. Agent’s details (if applicable)
Title	Mr	
First Name*	Tobias	
Last Name*	Miles-Mallowan	
Job title <i>(where relevant)</i>	Town Clerk	
Organisation <i>(where relevant)</i>	Newbury Town Council	
Address* <i>Please include postcode</i>	Town Hall, Market Place, Newbury, RG14 5AA	
Email address*	[REDACTED]	
Telephone number		
Consultee ID <i>(if known)</i>		

*Mandatory Field

PART B – Your representation(s)

All comments made at previous stages of the LPR have been taken into account by the Inspector and there is no need to resubmit these. Publication of the proposed Main Modifications is a regulatory stage and any representations made should relate specifically to the legal compliance and soundness of the proposed Main Modifications and should not relate to parts of the Plan that are not proposed to be modified.

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change.

Your name or organisation (and client if you are an agent):	Newbury Town Council
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Proposed Main Modifications and Proposed Changes to the Policies Map

1. Please indicate whether your representation relates to the Schedule of Proposed Main Modifications or the Schedule of Proposed Changes to the Policies Map and provide the modification/change number you are commenting on below:

Document name	Schedule of Proposed Main Modifications – November 2024
Modification/Change reference number (MM / PMC)	. We would like to see
MM1 Page 14 Paragraph 14	Newbury Town Council would like the LPR to be more specific on paragraph 4.11. when stating 'sustainable growth' stating that this covers, Drainage issues, Water infrastructure, Road ways etc.
MM3 Pages 16-17	Newbury Town Council would like Parish Council boundaries to be aligned with the Settlement boundaries
MM3 Pages 16-17	Newbury Town Council disagrees with the blanket net density and flatted developments. There needs to be consideration of conservation areas and their needs. Likewise, Newbury Town Council would like the LPR to consider current challenges in local areas such as Town Centre Flooding in Newbury. The LPR needs to consider housing mix and not simply refer to 'Flatted Developments.'
MM7 Page 22	<p>Newbury Town Council opposes this amendment, Newbury Town Council is concerned about the amount of Windfall Developments coming forward (Kennet Centre, Bond Street, Pound Street) as the Local Planning Authority is not allowing the local plan to include sites within the Newbury Settlement Boundary. The NPPF makes no mention of the words 'Settlement Boundary' so this cannot be considered as a key approach as it is not supported by Evidence from other Local Plans at Reg 18 Stage and beyond.</p> <p>NTC would like to see all developments within the 'Newbury Settlement' be counted towards the housing requirement figure. Had the Eagle Quarter been granted planning this would have added 427 properties that would not have been added to the housing target.</p>

MM14 Page 38-41	The changes to paragraph 5.45 creates a vagueness as to who is responsible for the identification and management of local heritage assets and non-designated heritage assets.
MM19 Pages 51-54	Paragraph 6.20. Newbury Town Council argue that all Windfall sites should be included in the calculations of future supply.
MM19 Pages 51-54	Table 2 Housing Supply 1 April 2023- 31 March 2041. The Sandford Park figures are lower than what is on this table.
MM23 Pages 60-61	Paragraph 6, should make it specific that the 40% affordable housing figure is across all housing types (flats, houses, size) and tenures.
MM25 Pages 63-65	Section on Transport – Transport assessment and travel plan must focus on need to divert traffic away from Newbury Town Centre notably current pinch points such as the Robin Hood Roundabout (A4) and A339.
MM29 Pages 70-71	Changes to the 9 th Paragraph. Newbury Town Council disagrees with setting the limits at 10 or more dwellings for the provision of affordable housing and feel that this should be in line with the rest of West Berks. The majority of developments within Newbury Settlement boundary is less than 10 dwellings.
MM31 pages 73-75	Paragraph 7.10 – this can be addressed as part of the Newbury Town Council’s Neighbourhood Development Plan
MM33 Page 79	Newbury Town Council Object to the changes shown in the Map (PMC10), the Market Place must be kept as a primary shopping area. We would like to see the east side of the Market Place retained as a Primary Shopping Area up until the traffic lights at the junction with Bear Street and Cheap Street.
MM36 page 85	Paragraph 8.3 – Newbury Town Council questions the figure of 1500 homes for Sandford development.
MM76 Pages 157-158	Paragraph after 10.22 – Newbury Town Council would like to see the section ‘for residential refurbishment developments of 10+....’ Reduced to developments of 5+. As most developments in Newbury are below 10+ properties
MM78 page 165	Penultimate Paragraph: Newbury Town Council is broadly supportive of this proposal; however, Newbury Town Council would like to see this go further and ask that the Local Planning Authority considers the Cumulative impacts of developments on capacity rather than individual developments. We would also ask that this section references that Grampian Planning Conditions would be imposed where there isn’t capacity.
MM90 page 207	We are disappointed to see this removed, whilst we accept the reasons for its deletion, we feel that this is an essential part of any local plan review.
MM105 page 235	Second Paragraph Parking: Newbury Town Council feel that the new wording weakens the parking requirements, we would like to see the original wording kept.

2. Do you consider the Proposed Main Modification or Proposed Policy Map Change to be:
(please tick/mark ‘X’ one answer for a and one for b)

a) Legally compliant

Yes

No

b) **Sound**

Yes No

Please refer to the guidance notes for a full explanation of 'legally compliant' and 'soundness'

If you consider the Proposed Main Modification or Proposed Policy Map Change not to be sound, please identify which test of soundness your representation relates to:
(please tick/mark 'X' all that apply)

Positively Prepared: The LPR should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements.	
Justified: the LPR should be the most appropriate strategy, when considered against the reasonable alternatives	
Effective: the LPR should be deliverable	
Consistent with national policy: the LPR should enable the delivery of sustainable development in accordance with the policies of the NPPF	

3. If you have answered 'No' to question 2a or 2b above, please provide details of why you consider the Proposed Main Modification or Proposed Policy Map Change is not legally compliant or is unsound, including any changes you consider necessary to make the Plan legally compliant or sound.

You will need to say why this change will make the Local Plan Review 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.

Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA)

4. Do you have any comments on the updated Sustainability Appraisal/Strategic Environmental Assessment Report – Proposed Main Modifications (November 2024)?
(Please be as precise as possible)

Page number	Summary of the whole plan
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Paragraph number	
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Comments:

NTC has produced its own SWOT analysis of the data in the SEA:

Strengths:

- **Comprehensive Data Collection:** The evidence base encompasses a wide range of studies and assessments, ensuring that the LPR is informed.
- **Strategic Site Allocations:** The identification of specific sites for development in Newbury is supported by evidence, facilitating targeted growth and efficient land use.
- **Public Consultation:** The inclusion of public feedback in the evidence base enhances the plan's responsiveness to community needs and aspirations.

Weaknesses:

- **Data Gaps:** Certain areas lack sufficient data, potentially leading to less informed decision-making for specific aspects of the plan.
- **Complexity:** The extensive volume of evidence can be overwhelming, making it challenging for stakeholders to navigate and fully comprehend all aspects.

Opportunities:

- **Adaptive Planning:** NTC would like West Berks to allow for the LPR to be responsive to emerging trends and data, enabling adjustments to strategies as new information becomes available.
- **Enhanced Stakeholder Engagement:** A transparent and accessible evidence base can foster greater community involvement and support for the LPR.

Threats:

- **Data Obsolescence:** Rapid changes in demographics, economics, or environmental conditions could render parts of the evidence base outdated, potentially impacting the relevance of the LPR.
- **Resource Limitations:** Constraints in resources may hinder the ability to update and expand the evidence base as needed, affecting the plan's effectiveness.

The Following are identified Data Gaps in the Local Plan Evidence:

1. Environmental Assessments:

- While general environmental appraisals are included, there may be insufficient localised data on:
 - **Air quality** impacts for specific sites in Newbury. The LPR makes reference to closing air quality monitoring.
 - **Biodiversity loss** and mitigation strategies for smaller, ecologically sensitive areas.

- **Flood risk analysis** updates, especially in light of changing climate patterns. There has been no review on the cumulative impact of developments across the Newbury Settlement on Flooding.

2. Infrastructure Planning:

- Limited clarity on **transportation modelling** for Newbury's growing population, including public transit capacity and road congestion analysis.
- Gaps in detailed planning for **healthcare and educational facilities** (e.g., school places (particularly secondary school provision), GP surgeries) that align with residential growth.

3. Affordable Housing Evidence:

- Specific data on **housing affordability trends** and the actual needs of Newbury residents, including the balance between affordable and market-rate housing (LHA rates haven't increased in line with market forces).

4. Economic Development:

- Lack of granular data on:
 - **Employment growth forecasts** tailored to Newbury's local industries.
 - The impact of the plan on **existing businesses** and local high streets (what involvement have the BID had?).

5. Community Feedback Insights:

- While public consultations are included, there may be limited analysis of:
 - Concerns about **overdevelopment** in areas around Newbury.
 - Residents' opinions on balancing conservation with growth.

Threats to the Local Plan:

1. Outdated or Incomplete Evidence:

- If demographic, economic, or environmental data becomes obsolete, it risks making the plan less relevant or poorly aligned with Newbury's actual needs.

2. Climate Change Impacts:

- Accelerating climate risks (e.g., flooding, extreme weather) could render long-term infrastructure and environmental planning inadequate.

3. Economic Uncertainty:

- Broader economic factors (e.g., post-Brexit changes, national economic downturns) could impact funding and viability for projects in Newbury.

4. Community Opposition:

- Insufficient engagement or perceived neglect of local concerns may lead to resistance against proposed developments, especially in sensitive areas (Eagle Quarter, Sandleford).

5. Strain on Existing Infrastructure:

- If the infrastructure planning is misaligned with population growth, Newbury could face:
 - Increased traffic congestion.
 - Overburdened schools, healthcare, and public services.
 - Flooding from sewage, which is already an issue
 - Electrical supply issues

6. Ecological and Heritage Impacts:

- Developments around Newbury might face backlash if they negatively affect:
 - The surrounding Areas of Outstanding Natural Beauty (AONBs).
 - Historical or cultural landmarks (skyline of Newbury).
 - Protection of the Newbury Conservation Area

7. Resource and Budget Constraints:

- Limited financial or staffing resources could delay or restrict the delivery of infrastructure projects and community facilities.

8. Regulatory and Policy Changes:

- Shifts in national planning policies or environmental legislation could undermine key aspects of the local plan, requiring revisions and delays.

NTC Recommends that the SEA should:

- **Bridge Data Gaps:** Commission updated studies on air quality, transport, flood risk, and biodiversity specific to Newbury.
- **Strengthen Community Engagement:** Ensure ongoing consultation with residents and stakeholders to incorporate real-time feedback.
- **Mitigate Climate Risks:** Incorporate adaptive planning for evolving environmental challenges.
- **Prioritise Infrastructure Delivery:** Align growth areas with clear commitments for roads, schools, and healthcare investments. Estate Design to encourage alternative modes of transport (cycle routes, walking, regular bus stops and circular car routes)

Closing the Data Gaps

1. Environmental Assessments

- **Air Quality:**
 - Conduct localised air quality studies, focusing on areas with proposed housing or employment growth, particularly near main roads (e.g., A339 and A4).
 - Use real-time monitoring equipment in high-risk zones to collect updated data and assess compliance with national air quality standards.
- **Biodiversity:**
 - Map wildlife corridors (green and blue) and identify species of concern within and near Newbury. Collaborate with local conservation groups for accurate ecological surveys.
 - Include biodiversity net gain calculations for each proposed development, specifying how habitat restoration will mitigate impacts.
- **Flood Risk Analysis:**
 - Update flood risk maps to include recent events and projected changes in rainfall intensity due to climate change.
 - Collaborate with the Environment Agency and Thames Water to model site-specific flood risks for proposed developments (both Fluvial and pluvial flooding). Develop a SUDs strategy and compliance for future developments

2. Infrastructure Planning

- **Transportation:**
 - Undertake a comprehensive transport demand study, particularly for public transit options (bus, rail) and active travel (cycling, walking) routes.
 - Use traffic simulation models to assess the impact of proposed developments on congestion in key areas like the A339 and Robin Hood roundabout.

- Investigate opportunities for park-and-ride systems or improved connections to Newbury Station.
- Investigate other local authorities who have successfully implemented mass transit systems into estate designs (Bicester North)
- **Education and Healthcare:**
 - Commission demographic projections to determine school place demand and the capacity of healthcare facilities, factoring in planned housing growth.
 - Engage with NHS trusts, Health and Wellbeing Board, LEA and BOB integrated care board to identify funding sources for additional infrastructure.

3. Affordable Housing Evidence

- Conduct a **housing needs assessment** specific to Newbury to determine demand for affordable vs. market-rate housing.
- Include data on median incomes and rent/mortgage affordability to inform planning policies and Section 106 agreements (developer contributions for affordable housing).
- Partner with housing associations to ensure proposed developments meet local needs.

4. Economic Development

- Develop detailed sectoral studies to identify:
 - Growth industries in Newbury (e.g., technology, retail, logistics).
 - The needs of small businesses and the potential impact of proposed development on high streets.
- Integrate local business (via BID, LEP's Chamber of Commerce and Voluntary Sectors) feedback into employment site allocations and infrastructure upgrades.

5. Community Feedback Insights

- Implement more granular surveys and focus groups in Newbury to gather targeted feedback on specific sites or proposals.
- Enhance transparency by publishing summaries of how public feedback has influenced decisions.

Solutions to Threats

1. Mitigating Outdated or Incomplete Evidence

- Build flexibility into the local plan by committing to regular updates of key evidence documents every 2–5 years.
- Include a monitoring framework in the plan that tracks key indicators (e.g., housing delivery, infrastructure provision) and allows for adaptive policies.

2. Addressing Climate Change Risks

- Integrate climate-resilient infrastructure into all new developments (e.g., sustainable drainage systems, renewable energy systems, tree planting, living walls etc).
- Set stricter energy efficiency standards for new homes and commercial buildings in Newbury to future-proof against rising energy costs and emissions targets.

3. Reducing Community Opposition

- Establish a clear communication strategy to explain the benefits of the plan (e.g., affordable housing, infrastructure improvements).
- Develop “green buffers” or open spaces near sensitive areas to balance development with the preservation of local character. Developments of certain sizes to have community gardens etc.

4. Managing Strain on Infrastructure

- Set up phased delivery of housing tied to infrastructure milestones, ensuring schools, roads, and healthcare are developed alongside new homes.
- Secure higher levels of developer contributions through clear viability studies that demonstrate the need for local infrastructure.
- More planned use of Section 106 and CIL monies to support infrastructure development (such as revenue funding to provide services)

5. Protecting Ecology and Heritage

- Ensure that developments near the North Wessex Downs AONB include strict design requirements to minimize visual and environmental impact.
- Introduce protections for Newbury’s historical sites (e.g., Shaw House) and designate/enforce conservation areas where appropriate.
- Neighbourhood Development Plan

6. Mitigating Economic and Resource Constraints

- Work with regional and national partners to secure funding for infrastructure projects (e.g., Levelling Up Fund, Homes England).
- Explore innovative financing options like public-private partnerships for key developments.

7. Addressing Regulatory Changes

- Monitor national planning policy changes closely and include “safeguarded” sites that can be adapted to meet evolving requirements.
- Regularly engage with policymakers and regional bodies to align local goals with national priorities.

NTC suggests the following **detailed recommendations and strategies** tailored for **transport, housing, and public engagement** in Newbury and its immediate surroundings, aligned with the West Berkshire Local Plan:

1. Transport Recommendations and Strategies

Short-Term Recommendations:

1. Public Transport Enhancements:

- Increase the frequency of bus services, especially during peak hours, on routes connecting residential areas to key hubs like Newbury Town Centre, Newbury Station, and Vodafone HQ.

- Improve integration between rail and bus services by adjusting bus schedules to align with train arrival and departure times.
- Introduce real-time travel information systems at bus stops and train stations to encourage public transport use, new developments to have tablets linked to public transport network, new developments to be no further than 400m from a bus stop (Bicester Eco Town).

2. Active Travel Infrastructure:

- Develop and expand safe walking and cycling routes connecting residential areas (e.g., Wash Common, Speen) to schools, employment zones, and retail centres.
- Install secure bike parking at key locations, including Newbury Station, Parkway Shopping Centre, and key employment sites.
- Prioritise bus, cycle and pedestrian routes to encourage these modes of transport over car use.

3. Traffic Management:

- Optimise traffic flow at congestion hotspots such as the Robin Hood Roundabout and the A339 corridor by implementing signal timing adjustments and lane reconfigurations.

Medium- to Long-Term Strategies:

1. Park-and-Ride System:

- Introduce park-and-ride facilities on the outskirts of Newbury (e.g., near the A34 and A339 junctions) to reduce town centre congestion and promote sustainable commuting.

2. Green Transport Initiatives:

- Create electric vehicle (EV) charging hubs at major car parks, with incentives for businesses to install EV chargers at workplaces.
- Partner with ride-sharing platforms to promote carpooling and shared commuting options.

3. New Transport Hubs:

- Establish integrated transport hubs in Newbury to combine bus, rail, cycling, and EV charging facilities into single accessible locations.

4. Future-Proofing Roads:

- Conduct detailed traffic modelling to assess the long-term impact of proposed developments on road capacity and congestion.

2. Housing Recommendations and Strategies

Short-Term Recommendations:

1. Affordable Housing Delivery:

- Require developers to allocate a higher proportion of affordable housing units (e.g., 40%) on new developments in and around Newbury.
- Use Section 106 agreements to fund affordable housing or key infrastructure improvements where on-site provision isn't feasible.

2. Diverse Housing Mix:

- Prioritise developments that include a mix of housing types to meet the needs of:
 - Young professionals (e.g., 1–2-bedroom apartments).
 - Families (e.g., 3–4-bedroom homes).
 - Older adults (e.g., bungalows or retirement living).

- Support development of family sized properties over high density housing with focus on 1/2 bedroom properties.

3. Brownfield Development:

- Incentivise the redevelopment of brownfield sites in Newbury Town Centre (e.g., underused industrial or retail spaces) for mixed-use or residential purposes to reduce greenfield land use.

Medium- to Long-Term Strategies:

1. Sustainable Housing Design:

- Mandate high energy efficiency standards for new homes (e.g., Passivhaus principles or EPC rating A), including features like solar panels, rainwater harvesting, heat pumps, living roof/walls.
- Incorporate community green spaces, play areas, and allotments into housing developments to promote well-being and biodiversity.

2. Smart Housing Allocation:

- Focus residential developments in areas with good access to public transport, reducing reliance on cars and supporting sustainable commuting patterns and access to real time public transport information.
- When considering large scale developments, adopt Cherwell Districts approach to Bicester North Development and plan in designs that encourages and promotes alternative methods of transport.

3. Infrastructure-Linked Housing:

- Phase housing delivery with infrastructure upgrades, ensuring that schools, healthcare facilities, and transport links are in place before or alongside residential growth.

4. Rural and Suburban Integration:

- In areas surrounding Newbury, ensure new housing developments blend with the existing character of villages and rural areas by enforcing strict locality specific design codes.
- Protect green corridors and breaks between settlements to protect unique settlements such as Thatcham and Newbury.

3. Public Engagement Recommendations and Strategies

Short-Term Recommendations:

1. Targeted Community Consultations:

- Organise ‘town hall’ meetings, drop-in sessions, and workshops focused on specific developments or issues (e.g., transport, housing, green space).
- Use online surveys and social media platforms to reach a broader audience, ensuring input from younger demographics and commuters.

2. Transparent Communication:

- Publish easy-to-understand summaries of key documents, such as site allocations and the sustainability appraisal, to make the Local Plan more accessible.
- Provide regular updates on the plan’s progress through a dedicated webpage, email newsletters, and local media.

3. Feedback Loop:

- Create a visible process to show how public feedback has influenced decisions, building trust and credibility with residents.

Medium- to Long-Term Strategies:

1. Citizen Advisory Panels:

- Establish local advisory panels comprising residents, businesses, and community leaders to provide ongoing input on major developments.
- Rotate membership annually to include diverse perspectives.

2. Community-Led Initiatives:

- Partner and support local Councils to develop “neighbourhood plans” for specific parts of West Berks, allowing residents to shape growth and land use at a granular level. Specifically allowing Neighbourhood Plans to allocate housing.

3. Youth Engagement:

- Collaborate with schools and colleges in Newbury to involve younger generations in planning discussions through workshops, competitions, and project-based learning.

4. Digital Tools for Engagement:

- Launch a mobile app or interactive map that allows residents to view proposed developments, track progress, and provide feedback directly.

5. Annual Reviews:

- Host an annual Local Plan review meeting open to the public, where key milestones, challenges, and updates are shared transparently.

Habitats Regulations Assessment

5. Do you have any comments on the addendum to the Habitats Regulations Assessment of the Proposed Main Modifications (November 2024)?

(Please be as precise as possible)

Page number	See below:
Paragraph number	<p>1. Data Limitations:</p> <ul style="list-style-type: none">• Outdated or Non-Specific Data: The assessment references data that may not reflect current ecological conditions, potentially affecting the accuracy of impact predictions. For instance, the reliance on historical water quality data in Section 4.4 (pages 13-14) may not account for recent changes in pollution levels or hydrological dynamics. <p>2. Cumulative Effects Analysis:</p> <ul style="list-style-type: none">• Limited Evaluation of Combined Impacts: While individual impacts are assessed, the report lacks a comprehensive analysis of cumulative effects arising from multiple plan policies or in combination with other projects. Section 5 (pages 21-22) briefly mentions other plans and projects but does not delve into a detailed cumulative impact assessment. <p>3. Monitoring Framework:</p> <ul style="list-style-type: none">• Absence of a Detailed Monitoring Strategy: The report does not provide a robust framework for tracking the effectiveness of proposed mitigation measures over time. Although mitigation is discussed in Section 7 (pages 25-31), there is a lack of specificity regarding how these measures will be monitored and evaluated for success. <p>4. Climate Change Considerations:</p> <ul style="list-style-type: none">• Insufficient Analysis of Climate Change Impacts: The assessment does not thoroughly examine how climate change may exacerbate impacts on protected sites. Potential effects such as altered hydrological regimes or increased frequency of extreme weather events are not adequately addressed in the context of habitat vulnerability. <p>5. In-Combination Effects:</p> <ul style="list-style-type: none">• Limited Evaluation with Other Regional Plans: There's a lack of detailed assessment regarding how the Local Plan's proposals might interact with other regional plans or projects, potentially leading to an underestimation of cumulative impacts. Section 5 (pages 21-22) lists

	<p>other plans but does not provide an in-depth analysis of their combined effects.</p> <p>6. Species-Specific Assessments:</p> <ul style="list-style-type: none"> • Generalised Species Impact Analysis: The report could benefit from more detailed assessments of species particularly vulnerable to proposed developments. While habitat impacts are discussed, there is limited focus on specific species' needs and how they might be affected by habitat changes or disturbances.
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Comments:

Newbury Town Council has the following concerns:

Data Limitations

Issue:

- Some assessments rely on outdated or non-specific data, potentially compromising the accuracy of conclusions regarding habitat and species impacts.

Legislation and Regulations:

- **Conservation of Habitats and Species Regulations 2017 (as amended):** Requires assessments to be based on the best available scientific evidence (Regulation 63).
- **EU Habitats Directive (92/43/EEC):** Emphasises data sufficiency for environmental assessments.

Best Practice Recommendations:

- Adopt **remote sensing technologies** and **citizen science initiatives** for up-to-date species and habitat monitoring.
- Utilise datasets from organisations like the **UK Centre for Ecology & Hydrology (CEH)** and **Natural England's MAGIC database**.
- Incorporate emerging ecological monitoring techniques, such as **eDNA analysis** for tracking sensitive aquatic and terrestrial species.

Cumulative Effects Analysis

Issue:

- Limited evaluation of cumulative impacts from multiple developments or plan policies that may collectively affect protected sites.

Legislation and Regulations:

- **Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Directive):** Mandates that strategic environmental assessments consider cumulative impacts.

- **Conservation of Habitats and Species Regulations 2017:** Requires assessment of combined impacts from multiple plans/projects.

Best Practice Recommendations:

- Establish a **Cumulative Impact Matrix** identifying and quantifying combined pressures on biodiversity.
- Collaborate with neighbouring authorities for regional assessments, aligning with the **Duty to Cooperate** under the **Localism Act 2011**.
- Use ecological modelling software such as **InVEST (Integrated Valuation of Ecosystem Services and Trade-offs)**.

Monitoring Framework

Issue:

- The report lacks a robust strategy to track the success of mitigation measures over time.

Legislation and Regulations:

- **Habitats Regulations 2017, Regulation 63:** Requires that competent authorities ensure mitigation measures are adequately monitored.
- **The Environment Act 2021:** Emphasises monitoring biodiversity gains through long-term strategies.

Best Practice Recommendations:

- Develop a **SMART-based monitoring framework** (Specific, Measurable, Achievable, Relevant, Time-bound).
- Implement **Biodiversity Net Gain (BNG)** monitoring using DEFRA's biodiversity metric tools.
- Partner with local conservation organisations and use long-term indicator species studies.

Climate Change Considerations

Issue:

- The report lacks analysis of how climate change may exacerbate impacts on protected sites.

Legislation and Regulations:

- **Climate Change Act 2008:** Sets legally binding climate adaptation targets.
- **National Planning Policy Framework (NPPF) 2021:** Requires local plans to address the risks of climate change on natural environments.
- **The Environment Act 2021:** Calls for adaptive biodiversity measures.

Best Practice Recommendations:

- Assess potential changes in species migration, water availability, and habitat viability due to changing climate conditions.

- Integrate climate adaptation measures into development proposals (e.g., habitat corridors).
- Use **UK Climate Projections (UKCP18)** data for modelling scenarios.

In-Combination Effects

Issue:

- Insufficient evaluation of how the Local Plan interacts with other regional or national projects, leading to potential underestimation of impacts.

Legislation and Regulations:

- **Conservation of Habitats and Species Regulations 2017:** Requires in-combination assessments (Regulation 63).
- **Environmental Impact Assessment (EIA) Regulations 2017:** Mandate the evaluation of cumulative project impacts.

Best Practice Recommendations:

- Create a **regional development impact database** for coordinated assessments.
- Conduct **spatial and temporal GIS analyses** to visualise in-combination effects.
- Partner with **neighbouring planning authorities** for data sharing and joint environmental assessments.

Species-Specific Assessments

Issue:

- Limited focus on species particularly vulnerable to the proposed developments.

Legislation and Regulations:

- **Wildlife and Countryside Act 1981:** Protects specific species and their habitats.
- **Conservation of Habitats and Species Regulations 2017:** Requires assessments for species listed in Annex II of the Habitats Directive.

Best Practice Recommendations:

- Conduct species-specific surveys for key species such as bats, great crested newts, and dormice, adhering to **Natural England survey guidance**.
- Develop **species action plans** aligned with the **UK Biodiversity Action Plan (UKBAP)**.
- Implement **mitigation banking schemes** to offset habitat disturbances for vulnerable species.

Recommendations:

- **Update Baseline Data:** Incorporate the most recent ecological data to enhance the accuracy of impact assessments.
- **Enhance Cumulative Impact Analysis:** Develop a more comprehensive evaluation of cumulative and in-combination effects, considering other local and regional plans.

- **Strengthen Monitoring and Adaptive Management:** Establish a detailed monitoring framework with clear indicators to assess the effectiveness of mitigation measures and allow for adaptive management.
- **Integrate Climate Change Adaptation:** Assess potential climate change impacts on protected sites and incorporate adaptive strategies into the Local Plan.
- **Conduct Species-Specific Studies:** Perform detailed assessments for vulnerable species to ensure their protection under the proposed developments.

By addressing these weaknesses and gaps, the HRA can provide a more robust framework to safeguard West Berkshire's valuable natural habitats while facilitating sustainable development

Notification of Progress of the Local Plan Review

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

(please tick/mark 'X' all that apply)

<i>The publication of the report of the Inspector appointed to carry out the examination</i>	X
<i>The adoption of the Local Plan Review</i>	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		Date	
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Your completed representations must be received by the Council by 11:59pm on Friday 31 January 2025.

Please note – Personal/Contact Details

All submitted representations will be made publicly available, including on the Council's website, with the person/organisation making the representation being identified. A copy of all submitted representations will also be made available to the Planning Inspectorate and the person appointed by the Secretary of State to conduct the examination.

To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the LPR. The Council therefore cannot accept anonymous representations – you must provide us with your name and contact details. Address details will not be made publicly available. 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>.

The Council will also need to make sure that the names and full addresses of those making representations can be made available and taken into account by the Inspector. By submitting a representation, you confirm that you agree to this and accept responsibility for your comments.

The Planning Inspectorate's privacy statement for local plan examinations is available at <https://www.gov.uk/guidance/local-plans#plans-privacy-statement>.