

May I point the inspector to the current NPPF section 7 paragraphs 90 to 95

This section seems to want to control the impacts on current shopping centres by guiding local planning authorities to support their **growth, management, and adaptation**.

Shopping centres are encouraged to evolve beyond retail, incorporating leisure & office spaces and maybe housing.

As you can see from what I have submitted. the base line for assessing the viability of the Kennet centre is based solely on an economics officer who

- No longer works for the council
- Did only online research
- Introduced a basic error in information presented both to Western Area planning and district planning that has never been corrected.

I refer to the vacancy levels between Parkway and the Kennet centre, also the averages used across west Berkshire.

It was initially stated that vacancy rates at Parkway was zero %

That was then removed at district planning, but the difference between the 2 areas remained unchanged. i.e. The 9.834% higher mentioned in the committee reports.

As of yesterday a walk around Parkway shows 7 actual and 8 effective units empty out of 50. That is 16%. The Kennet centre is noted at 16.76 %.

So just 0.76% difference.

Now if we focus on verified action taken by the owner of the Kennet centre. We see from adverts, still showing via local estate agents like quintons, that tenancy cannot be guaranteed longer than Jan 2026. Just 6-7 months as of June 2025

That length of lease artificially alters the vacancy rate of the Kennet centre. Any large store would look for a minimum of 10 years to justify investment in moving into the Kennet centre.

Why is that important? Because the economics officer supported this application based on inaccurate data.

Vacancy rates are used to justify demolition and replacement. In reality following the NPPF and supporting adaptation of the Kennet Centre for more mixed used as well as allowing long leases could easily alter the vacancy rate to be significantly less than parkway.

We should also keep in mind that there are successful businesses operating from the Kennet centre. People like Tiny Town, Boswells, Timpsons etc. Add to this that the replacement before us, by the developers own estimate, would take 3 to 3.5 years.

During that time business and residents around the site would be massively impacted. Rather than supporting growth we suppress activity and the vitality of the town.

This is the exact opposite of what the NPPF aims for.

Even after any such development is completed we still have the arguments around the new retail and offices.

As an owner of several office units next to the town centre I have a clear understanding of what people look for when wanting to rent. A fundamental of that is some parking. The development offers none. Further it places those offices in a wind funnel which is overshadowed for much of the year.

The arguments by the developer, about how easy it will be to rent out new fitted units, is countered by existing units, that are fitted out that have not rented. A very large reason for that is they have no parking.

Now we also need to look at the housing mix on offer.

Keep in mind that Newbury has taken huge amounts of its offices and already converted them to flats.

- Pearl House
- The build to rent next to where we sit
- Old Bayer offices (Bond House)
- West Point House
- West Street House (Where West Berkshire Children's Services were)
- South Brooke house
- Mill Reef house

It is a fact, that when estate agents are asked what Newbury needs in housing terms they almost unanimously say no more flats, they say we need houses. This is clearly evidenced by Pearl house which is a brand new development that remains essentially empty.

Why is that important? Because if current flats don't achieve occupancy then there is no economic benefit to the town.

So to conclude: The incorrect data used and actions to suppress retail take-up at the Kennet centre, lead to the economics officer supporting this application. Real world shows the opposite is more likely. i.e. That the development has been having a detrimental effect on the town's economics already, that for several years until the

development is delivered it would have a significant negative impact and that even after completion there is little solid evidence to say Newbury would be better off.

Therefore I urge the inspector to refuse this application based on Section 7 of the NPPF and until the developer has demonstrated that every effort has been made to bring more retail, leisure and offices into the kennet centre. At a minimum a proper study of the impact, based on accurate data, should be undertaken so the effects of such a dramatic change to Newbury is understood.