

23/0124 West Berkshire Local Plan Review

Responses from Planning Committee, Stratfield Mortimer Parish Council

From Andrew Richardson:

Development Strategy – pages 10-25

No comments over and above the issues raised in our response in early 2023

Design Quality – 33-43

Comment from Inspector - Is policy SP7 consistent with national policy aimed at achieving well-designed places (Chapter 12 NPPF).

Having looked at this section my feeling is that the local plan broadly meets the criteria. We did not make a comment on this in our previous submission

Landscape Character 33-37

Question from Inspector: Is the requirement in policy SP8 for all residential development to be accompanied by an appropriate landscape assessment justified and consistent with national policy?

Reviewed chapter 19 of national policy framework (which deals with conservation and heritage) and the text in the LPR appears to be broadly in line with the requirements. No comments were made on the previous submission.

Historic Environment 37-42

As above – same conclusion

From Danusia Morsley:

I have reviewed the following sections:

Development Strategy - p 10-25

Biodiversity - geodiversity - p 45-51

Fostering economic growth - p 73-85

Appendix 6 - p258-261

I find the inspector has not raised any new issues pertinent to us in these sections. I also find he has not addressed any of the points we raised so I think they are all still valid and should remain

From Graham Bridgman:

Development Strategy

Our earlier response in relation to SP1 was “The strategy is in general sound but many aspects are described as West Berkshire will support or encourage, but no indication is given of how they will be funded.”

Personally, I don't think that funding is a relevant issue – the assumption should be that if the LPR proposes something it will be funded.

Looking at the questions raised by the Inspector in section M3 (“Spatial Strategy”) that have relevance for Mortimer, my responses would be:

Q3.1 Does policy SP1 set out an appropriate spatial strategy that will contribute to the achievement of sustainable development?. The LPR identifies three spatial areas whereas the current local plan identifies four. The nature of what are currently the Eastern Urban Area and the East Kennet Valley are different and combining them into the Eastern Area fails to recognise the more rural nature of the East Kennet Valley. Indeed Policy SP3 effectively recognises this difference by differentiating between the urban areas (including Tilehurst and Calcot) and the rural service centres (including Burghfield and Mortimer).

Q3.1(d) In particular: ... Theale being the focus for additional housing in the Eastern Area fails to recognise the developments in various other locations (eg Tilehurst, Calcot, Burghfield and Mortimer) that are carried over from the current Plan. (Nb that SP1 doesn't mention Theale under the Eastern Area sub-heading.)

Q3.2 Is the settlement hierarchy defined in policy SP3 and tables 1 and 17 of the Plan appropriate and based on proportionate evidence? So far as Mortimer is concerned, yes.

Q3.3 Are the settlement boundaries defined on the Policies Map appropriate and based on proportionate evidence? So far as Mortimer is concerned, yes.

Q3.4 Does policy SP3 set out an effective and justified approach to allocating non-strategic sites at urban areas, rural service centres and service villages through neighbourhood plans? So far as Mortimer is concerned, yes.

Q3.5 Is policy SP4 relating to development within the Detailed Emergency Planning Zones, the 5km Outer Consultation Zones, and 12km Consultation Zones around AWE Aldermaston and AWE Burghfield consistent with national policy and relevant legislation? We understand this to be the case (the Burghfield DEPZ extends slightly into the parish of Stratfield Mortimer).

Q3.12 Are the Council's proposed modifications to policy SP12 (to state that the Council will supply a housing requirement figure for each neighbourhood area when a neighbourhood plan is being prepared or updated, and that any sites allocated in a neighbourhood plan would be additional to sites allocated in the Plan) necessary to make the Plan sound and would they be effective in that regard? Allocating a housing requirement when a neighbourhood plan is being prepared should be part and parcel of the process. It isn't clear at what stage there would be an allocation where a neighbourhood plan is being updated and this could be clarified (for example, Stratfield Mortimer is (the only area?) preparing an updated plan and the LPR makes it clear that there will be no additional housing requirement over and above the requirement in the current plan currently being built out.

Q3.13 Is the strategic approach of restricting development outside settlement boundaries set out in policies SP1 and SP2 justified and consistent with national

policy? We understand it to be consistent with national policy, and consider that it is justified to restrict development in the countryside outside settlement boundaries.

Housing Land Supply

Although this is in section 7, so a response isn't required until March, it may be worth responding to Q7.3 *Is the assumption that 82 dwellings will be completed in the plan period on land to the south of St John's School, The Street, Stratfield Mortimer justified?* Suggested response is: Yes, the site is being built out and the phased development is on track to be completed as anticipated. Indeed, it is very possible that the site will deliver a further 20 windfall dwellings over and above the 110 designated in the Stratfield Mortimer Neighbourhood Development Plan.

Climate Change, Flood Risk

The LPR has draft policies SP5 (*Responding to Climate Change*) and SP6 (*Flood Risk*). Our previous response was to SP6 only, and doesn't appear to have been addressed, hence the suggested response below.

Q12.4 *Is policy SP6 consistent with national policy and associated guidance relating to development and flood risk?* We repeat our response to the initial consultation: "With respect to run-off on pre-developed sites the maximum discharge rate equivalent to 50% of the existing 1 in 100 year runoff rate is not acceptable. There is normally a logarithmic relationship between probability and run-off data. Thus 50% of the existing runoff rate has a priority of about 0.1 i.e. is a 1 in 10 year event. This is unacceptable and could lead to relatively frequent flooding. A 1 in 50 year runoff rate would be much more appropriate."

From David Butler:

Housing – pages 105-210

DM17 Rural Exception housing

It's for smaller schemes in with market housing schemes and requires a needs survey to provide evidence of a local need, Does the council do this and how often (every application) **Supporting text 11.6 answers this - its by parish council and needs to be up to date!**

DM18 Self Custom Built Housing

Must be sensitive to the area but this is a bit subjective, We are not in AONB but it need to remain looking like a typical English village. **Not really addressed but not a big issue.**

DM20 Gypsies Travellers

Council to allocate land which meets their needs such as infrastructure, transport, ecological assessments and so on. This needs looking at! **Quite detailed and 4 houses corner (17 plots) is referenced, I have concerns over this even if it is Government policy, also there is no mention of public security or the policing of gypsy sites.**

DM21 retention of Mobile Parks

We need to safeguard their loss as affordable housing. This is answered in 11.37 as a need to safeguard the loss of these sites.

DM 30 Residential Space Standards

This may be national standards but England has the smallest new homes in Europe (Not something to be proud of) 11.100 reiterates my comments , very good answer.

Economic Growth – pages 210-238

DM33 Development in AWE

To be supported however West Berks already know of major development plans which will impact local roads, businesses, accommodation and services and this is not referred to. Text 12.11 to 12.13 This is a difficult one to answer but local impacts are not referred to.

DM38 – Educational and Institutional

Supported only if proportional and there is a need, I suggest we need to look 5 years ahead not wait for it to be a problem. Text 12.57 part answers this as “planning authorities to look at existing and new communities”.

DM40 - Public Open spaces

10 or more dwellings to provide spaces based on 3-3.4 Ha/1000 population No comment all ok.

DM41 - Digital Infrastructure

Fibre to all residential development premises, I am unsure of where this is a legal requirement. All ok, well defined in policy and text 12.96

DM42 - Transport Infrastructure

This doesn't go far enough, New developments to CONSIDER all forms of transport, Car, Bike, Horse, Bus, Train or walking All ok now incorporated in policy and texts.

DM44 – Parking

We are zone 3 so for Housing 1bed=1.5 spaces, 2 bed = 2 spaces, 3 bed =2.5 spaces, 4 bed = 3 spaces. All ok, zones highlighted.

DM45 – Travel planning

The wording is not right it repeats itself, 60 dwellings= travel plan, 10 dwellings = travel pack All now ok.