

## Summary of representations received by West Berkshire District Council on the Compton Neighbourhood Development Plan as part of the Regulation 16 consultation

**Consultation dates:** Friday 4 June – Friday 16 July 2021

Ref No.	Consultee	Policy / paragraph	Summary of comment
cndp2	Oxfordshire County Council Minerals and Waste Planning Policy	General	<ul style="list-style-type: none"> <li>There are no Minerals safeguarding areas near the border at that point.</li> <li>There are no quarries in that area that would be affected.</li> <li>There is a waste facility (Prospect Farm) about 2km from the boundary of the village. It has a temporary planning permission and is sufficiently distant not to be affected.</li> </ul>
cndp3	Cllr Carolyne Culver	General	<p>Housing Site Allocations Development Plan Document allocates 140 homes on the former Pirbright site. The latest planning application 20/01336/OUTMAJ is seeking up to 185.</p> <p>There should be commensurate investment in infrastructure - schools, doctors' surgery and public transport - if this many homes are to be built.</p> <p>The developer needs to provide 30 per cent affordable homes on a brownfield site, and the development should meet the requirements of West Berkshire Council's Strategic Housing Market Assessment recommended housing mix currently developments have too few one and two bed homes. See <a href="https://info.westberks.gov.uk/CHttpHandler.ashx?id=40949&amp;p=0">https://info.westberks.gov.uk/CHttpHandler.ashx?id=40949&amp;p=0</a> page 370 table 140.</p> <p>People in Compton want one and two bed homes so that their children can stay in the area, or so they themselves can downsize without having to move out of the area.</p>
cndp4	Clive Tombs	Policy C15: Public Rights of Way	The design of new developments should seek to incorporate footways of sufficient width throughout their course, with appropriate dropped crossing points.
		Policy C19: Sustainable	Strong support for policy, particularly in the context of evolving proposals for improved cycle- and/or walking routes south from Compton to Hampstead Norreys and, potentially, north towards Didcot.

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		Transport Network	<p>There should be consideration of increased financial and other active local support for, use of and if feasible further enhancements to, the established WBC-funded/Newbury &amp; District-operated local bus route 6. Purpose would be to maintain, increase use of and if possible increase frequency of, this important link for Compton and other nearby villages to/from Newbury.</p> <p>Consideration could also be given to connection with a new 'missing link' bus service linking West Berkshire with the employment opportunities at Harwell Business Campus and in Didcot, and Didcot Parkway Station - although it has to be acknowledged that this 'missing link' bus service would require pump-priming funding to establish and to maintain it, as is also the case with the existing bus route 6.</p>
		Policy C23: Infrastructure Priorities	Support the identified priority projects, in particular the first bullet point for the reasons above.
cndp5	Environment Agency	General	<p>Unable to review the plan due to resourcing issues within the team and high workloads.</p> <p>Reference made to guidance on neighbourhood planning produced by Natural England, English Heritage, Forestry Commission, and Environment Agency. This sets out sources of environmental information and ideas on incorporating the environment into plans:  <a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environmentagency.gov.uk/LIT_6524_7da381.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environmentagency.gov.uk/LIT_6524_7da381.pdf</a></p>
cndp6	Transport for London	General	No comments
cndp7	Robin Edwards	General	No comments
cndp8	Sport England	General	<p>No specific comments made on the NDP. General advice provided in respect of:</p> <ul style="list-style-type: none"> <li>• compliance with section 8 and paragraphs 96 and 97 of the National Planning Policy Framework (NPPF);</li> <li>• compliance with the health and well-being section of Planning Practice Guidance</li> <li>• evidence base and assessing needs;</li> <li>• demand for sport as a result of new development;</li> </ul>

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			<ul style="list-style-type: none"> <li>• Sport England's statutory consultee role in protecting playing fields and the presumption against the loss of playing field land; and</li> <li>• design</li> </ul>
cndp9	The Coal Authority	General	No comments
cndp10	Office for Nuclear Regulation (ONR)	General	<p>ONR's land use planning processes published at <a href="http://www.onr.org.uk/land-useplanning.htm">http://www.onr.org.uk/land-useplanning.htm</a> may apply to some of the developments within the Compton Neighbourhood Development Plan.</p> <p>If there are areas within an ONR consultation zone, be aware that in order for ONR to have no objections to such developments will require:</p> <ul style="list-style-type: none"> <li>• confirmation from relevant Council emergency planners that developments can be accommodated within any emergency plan required under the Radiation (Emergency Preparedness and Public Information) Regulations 2019; and</li> <li>• that the developments do not pose an external hazard to the site.</li> </ul>
cndp11	Canal and River Trust	General	No comments
cndp12	Highways England	General	<p>The strategic road network (SRN) is a critical national asset which it works to ensure is operated and managed in the public interest. Highways England will therefore be concerned with proposals that have the potential to impact the safe and efficient operation of the SRN, in this case the A34 and M4.</p> <p>Having reviewed the NDP and its supporting documentation, Highways England have no comments</p>
cndp13	Swindon Borough Council	General	No comments
cndp14	National Grid	General	<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines.</p> <p>National Grid has identified that it has no record of such assets within the Neighbourhood Plan area.</p>

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cndp15	Thames Water	Paragraph 193: Objective A	<p>Support objective, but consider that this is a valid planning matter and that the plan should include a policy relating to wastewater/sewerage infrastructure to ensure its soundness in line with guidance in the NPPF (paras 20, 26, 28) and Planning Practice guidance (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>Proposed new water / wastewater infrastructure policy text:</p> <p><u>Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.</u></p> <p><u>The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.</u></p>
		Policy C18: Sustainable Drainage	<p>Planning Practice Guidance states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>It is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to Sustainable Drainage Systems (SuDS) that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an</p>

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			<p>important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>Thames Water request the inclusion of the following paragraph:</p> <p><u>Surface water drainage - It is the responsibility of a developer to follow the sequential approach to the disposal of surface waters with proper provision for surface water draining to ground, water course or surface water sewers being given. The discharging of surface waters to the foul sewer can be a major contributor to sewer flooding and should therefore be avoided.</u></p>
		General	<p>The Thames Water region has been designated as 'seriously water stressed' and in light of this Thames Water are proposing the following policy text:</p> <p><u>Development must be designed to be water efficient and reduce water consumption. Refurbishments and other non-domestic development will be expected to meet BREEAM water-efficiency credits. Residential development must not exceed a maximum water use of 105 litres per head per day (excluding the allowance of up to 5 litres for external water consumption). Planning conditions will be applied to new residential development to ensure that the water efficiency standards are met.</u></p>
cndp16	Natural England	General	<p>No specific comments made on the NDP. General advice provided in respect of:</p> <ul style="list-style-type: none"> <li>the protection that paragraph 172 of the NPPF gives to Areas of Outstanding Natural Beauty;</li> <li>consideration of landscape policies in the development plan;</li> <li>Local Landscape Character Assessments; and</li> <li>consulting with the relevant AONB Partnership or Conservation Board.</li> </ul>

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cndp17	Homes England	Policy C6: Hostel retention at the HSA DPD Policy HSA23 Allocation at Pirbright Institute	<p>Regulation 14 response remains valid.</p> <p>The retention of the hostel site should not be mandated within policy. It should also be noted that this steps beyond the scope of and conflicts with West Berkshire's Housing Site Allocations Policy HSA23 which only deals with the 'site' and it's potential to come forward for development, not the buildings themselves. Policy HSA23 envisages that should this occur, the site must be integrated with the wider allocation, something which the above referenced planning application clearly does.</p> <p>There are significant challenges in reusing these buildings and integrating them with the wider redevelopment proposals. Furthermore, market testing with potential developers has indicated a preference for demolition rather than retention and, in addition, housing associations would typically prefer new build housing when transferring to their stock in order to ensure the quality and their ability to effectively ensure the long-term maintenance. Homes England are committed to the provision of a housing mix across the site which meets the needs of those seeking smaller 1 and 2 bedroom homes.</p> <p>Support for the broad principle in Policy HSA23 and suggest that Policy C6 is either deleted or amended to better align with HSA23.</p>
		Policy C7: Development Density at the HSA DPD Policy HSA23 Allocation at Pirbright Institute	<p>There is no design detail available within the Plan to substantiate the need to utilise single storey dwellings in Area B in order "to assist with the transition of the development in an appropriate scale to the open countryside beyond."</p> <p>As such, it is inappropriate for the Policy, in the absence of detailed supporting evidence, to stipulate this. It should therefore be left to the Development Management process, considering Technical Assessments, to appraise whether proposed building heights are appropriate or not.</p>
		Policy C9: Design at the HSA DPD Policy	<p>Policy should be updated to reference Building for a Healthy Life as the update to Building for Life.</p>

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		HSA23 at the Pirbright Site	We note the comment in the Consultation Report in response to the same point which was made at Regulation 14 stage however the update is not simply a Homes England's update to the document. Whilst we have partnered in producing the new document, it is important to note that this was produced alongside NHS England and NHS Improvement. The update is also referenced within the Government's National Design Guide and therefore as new Policy, the NDP should reflect the latest position.
		Policy C13: Community Uses at the HSA DPD Policy 23 at the Pirbright Site	<p>The Consultation Report suggests that the submitted plan wording is amended from Regulation 14 stage and now includes "and delivered" in respect of community facilities. However, the version published by the Council does not include this wording; clarification is required.</p> <p>In seeking to require delivery of these facilities within the proposed wording, the Policy is undeliverable on the basis that Homes England has no remit to deliver nursery facilities. Whilst there are instances of where premises for such facilities are provided, it would be expected that there would be a viable commercial operator. As noted below in our comments on the Consultation Report, we have had no commercial approach from potential operators. On this basis, the wording would be inappropriate.</p> <p>In addition to the above, the same issues exist as with the hostel site buildings, namely that the reuse of the former nursery building would be inappropriate in the context of the requirement for remediation and the comprehensive redevelopment of the site.</p>
		Basic Conditions Statement	<p>The section regarding policy C2 fails to reference key and relevant sections of the NPPF:</p> <ul style="list-style-type: none"> <li>• Para 117 - the importance of making "as much use as possible of previously-developed or 'brownfield' land"</li> <li>• Para 118c - notes that policy and decisions should "give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land"</li> <li>• Para 118d - notes that policy and decisions should "promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively".</li> </ul>

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		Consultation Report	<p>Section 6 seeks to respond to comments made at Regulation 14 by Homes England and West Berkshire Council in relation to draft Policy C13, specifically the potential use of buildings on the former Pirbright Site for childcare and employment provision.</p> <p>Paragraphs 6.2 and 6.3 refer to a technical note that has been prepared in response to comments. Notwithstanding the interest that existing childcare operators and potential businesses may have in seeking new premises, the commercial and practical realities of using existing buildings on the site have not been addressed and therefore the note is insufficient justification for the policy as drafted.</p> <p>Whilst the desire to see existing buildings reused is noted, there needs to be a recognition that buildings on the site are not fit for modern use and that the costs of bringing them to an acceptable standard would be restrictive. In addition, the retention of some buildings and demolition of others would prejudice the ability to deliver both comprehensive remediation and a cohesive development scheme. Finally, there has been no credible commercial approach to Homes England to discuss the potential use of existing buildings and on that basis, given our remit to deliver housing, including much needed affordable housing, we have progressed the redevelopment proposals as per the submitted planning application.</p>
		Examination Involvement	Given the important issues raised and our interest in the only allocated housing site in Compton, Homes England would wish to be involved in any relevant examination hearing that may be held. We continue to seek a positive dialogue with the NDP group/Parish Council around the long-term redevelopment of the site and look forward to the next steps in the NDP process.
cndp18	Historic England	General	Pleased that several of their recommendations with regard to the historic environment at the pre-submission stage have been incorporated into the submission version, including a clear objective for the historic environment and inclusion of archaeological remains in the review of the parish's heritage assets.
		Appendix 2	It would contribute to the completeness of the evidence base if the scheduled ancient monument of Perborough Castle were included on the map of heritage assets on Page 62.
		C6, C13	Whilst they have not been identified as heritage assets we are interested that the plan requires retention and reuse of buildings of the former hostel, which lie outside the adopted SPD boundary.



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			We support the reuse of existing buildings, rather than demolition, particularly where they are of robust construction and have a quality of design that creates a strong sense of place and a record of the area's past development and identity. We see this as an important aspect of sustainable development by retaining the carbon embodied in the building materials, their transport and construction of the buildings. As such we are pleased to support Policy C6.
cndp19	Gareth Ryman, Principal Ecologist West Berkshire District Council	Paragraph 16.5	Is habitat creation and improvement planned in these areas?
		Paragraph 16.6	Future use should have basins to hold water if possible, though how this works with the ground water situation is unclear it would help with surface flood water alleviation.  And provide extra local habitat opportunities for wildlife.
		Paragraph 16.14	As part of the Parish design guide preferred species for planting should be included/stated.
		Paragraph 16.15	DEFRA Metric 3.0 Published ~07/07/2021
		Paragraph 16.15, 1 <sup>st</sup> bullet	Engagement with the Districts Green and Blue infrastructure plan will help here.
		Paragraph 16.15, 5 <sup>th</sup> and 6 <sup>th</sup> bullets	Nature recovery network should be also spoken about.
		Paragraph 16.17	Must talk about ground water also, it is the most important environmental factor/constraint effecting the area.  Having management plan for the ditch and stream network in the parish would be very useful.
		Paragraph 17.7	Use multi purpose solutions with SuDS included in the new parking areas, these will need maintenance. Important in water quality and drainage.
		Paragraph 17.10	Include pool car availability for larger new developments.
		Paragraph 17.11	A higher ratio per new dwelling than other areas of the District would probably help.
		Paragraph 17.12	Verge management will also need to be considered.

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		1 Paragraph 9.3 Objective A	<p>Work needed on abstraction impacts by TW on the natural environment with low flows in the summer months. Kennet catchment partnership are the managing agents for the Pang catchment which Compton parish sits within.</p> <p>Misconnections should also be targeted also - <a href="https://www.thameswater.co.uk/help/home-improvements/misconnected-pipes">https://www.thameswater.co.uk/help/home-improvements/misconnected-pipes</a>  <a href="http://www.connectright.org.uk/">http://www.connectright.org.uk/</a></p>
cndp20	Stuart Clark, Principal Engineer, West Berkshire District Council	Policy C18: Sustainable Drainage	The plan does not include a surface water flood risk plan and it does not acknowledge the effects of climate change on flood risk.

Representations are available to view in full on West Berkshire District Council's website: <https://info.westberks.gov.uk/comptonnp> and on the Council's Consultation Portal: <https://consult.westberks.gov.uk/kse>.