

From: Richard Carrow, Chairman Burghclere Parish Council

Portal Hall
Church Lane
BURGHCLERE
RG20 9HX

18th November 2020

Local Plan Update

Introduction

1. Burghclere Parish Council is grateful for the opportunity to comment on the Local Plan Update. We would like to commend those involved for the significant amount of work undertaken in unprecedented conditions.
2. Before commenting in detail the parish council wishes to signal its principal concern at the continued lack of 5 year land supply, the consequences of which means that the 'presumption in favour of sustainable development' (para 11d of the NPPF) apply. The effect of this has spawned a number of planning applications in the parish two of which have been upheld at appeal and two dismissed. A fifth appeal will go to a Hearing on 3 Dec at which we will argue the case for 'prematurity' in respect of the Neighbourhood Plan (NP). Since the ALP policies SS1 (and others) are considered out of date, the risk of speculative development that completely skews the intent behind the policies of the LP remains unacceptably high, and more pertinently disenfranchises residents and their local representatives from the protection that such policies are meant to provide.

General observations

3. We understand that planning reforms envisaged in the White Paper are unlikely to materialise before the LPU is complete. We would wish support for neighbourhood planning to continue and welcome focus on design and climate change, which should translate into meaningful policies as the new Local Plan develops.

4. We further understand that the affordable housing % for new development will remain as now. We would not wish to see any reduction especially for smaller sites as proposed in the Changes to the Current Planning System consultation paper.
5. Borough Council encouragement of community-led plans (CLPs) is welcome, noting that without planning 'weight' they do not replace NPs but could form part of complementary, or subsequent supplementary activity for the benefit of local communities.
6. The parish council remains vexed about wastewater/sewerage in and around the village of Burghclere. Thames Water (TW) acknowledge that the problem of hydraulic overload (flooding) in very wet weather causes pollution overflow into local streams; the most recent event recorded was on 15 Nov and is the fifth this year. Nevertheless TW claim that the system can cope and have no plans to enhance their pipe network given lack of funding and higher priorities elsewhere. More development in the village or around Tothill will make an already unacceptable situation much worse.
7. Although recycling is a county matter, we would wish to see mention of the need for a Household Waste Recycling Facility (HWRC) to service the needs of those in the NW of the Borough/County as evidenced by the spat over funding for access to West Berkshire Council's HWRC at Newtown Road during the summer.
8. Consideration of alternative power generation opportunities is welcome. This should be further encouraged.

Detailed observations

9. Turning to the documentation:
 - a. Promoted Sites. No comment.

b. Settlement Study (Part 1).

- (1) We agree that Burghclere should be classified 'Small Village' under Category 5 given its size, availability of local services and facilities, accessibility to public transport and other facilities.
- (2) Para 1.1.1. We consider it important that the LPU continues to pursue a spatial planning approach to planning notwithstanding the proposals contained in the White Paper-Planning for the Future.
- (3) Para 2.3.1. We note the Inspector's comments¹ that policies SS1 and SS6 are not entirely consistent with rural housing policy contained within the Framework (NPPF), which is less restrictive. If we are to avoid Inspectors' interpretations of LP policies disadvantaging appeals then this perceived anomaly needs to be addressed. If this is not the case then PINS needs to be challenged.
- (4) Para 2.3.3. While recognising that our settlement needs to deliver at least 10 dwellings through either windfall development or through the NP process by site allocation, we are surprised that some building (a total of 8 houses at Whitway) is not included in these totals and would wish an acknowledgement in the future plan that all new housing within the parish is tallied against the requirement to ensure accounting is fair and transparent.
- (5) Para 4.1.5. We consider this to be a critical conclusion. Although without statutory force it should feature prominently in Category 5 planning considerations.
- (6) Para 4.2.3. Although we are not affected, some detail of how SPBs might be identified could be included.

¹ Appeal Ref: APP/H1705/W/20/3256370 Land at Oxleas House, Ox Drove, Burghclere RG20 9HH dated 29 Oct 2020

- (7) Appendix B - Employment Facilities. We agree with the last two paragraphs of the Methodology column, noting that in future working from home (WFH) is a factor likely to rise in prominence. This will have other impacts (i.a. space, connectivity etc.) that we would wish to see considered in later iterations.

c. Site Assessment Process

- (1) Para 2.11. We strongly support neighbourhood planning as a means of assisting housing delivery. The risk that with the loss of a 5 year land supply planning appeals may override the work of NPs cannot be overstated. This would significantly impact on the willingness of communities to trust, engage and deliver on NPs.

- (2) Appendix 1. The Detailed criteria column is presentationally confusing. Options should be numbered or bulleted for clarity and simplicity.

d. Sustainability Appraisal Report We have no specific observations against the Consultation Questions at para 17.2 but would like to make the following observations.

- (1) Natural Environment and Sustainability. The parish council is supportive of efforts in respect of Natural Environment and Sustainability, and in particular, water resource management, biodiversity, waste/recycling and renewable energy. Policies to improve, enhance or increase use would be supported and, where feasible, encourage the engagement and support of local communities through education and funding for specific initiatives.

- (2) Transport. Rural communities such as ours will continue to rely on private transport given the scarcity of public transport links. Growing electrification of vehicles will require improvement to and enhancement of the local grid; the current number of power cuts demonstrates the system is not robust and is therefore unlikely to cope with increased demand. At the same time, the road network should be reexamined to factor in the growing range of e-vehicle options: from e-bikes and e-trikes to e-cars such as the Citroen Ami.