

Representations in respect of West Berkshire Local Plan Review (Reg 19) Proposed Submission

**Thames Valley Chamber of Commerce Group on behalf of West Berkshire
Chamber of Commerce**

1.0 Introduction

Introduction and Background to West Berkshire Chamber of Commerce

- 1.1. West Berkshire Chamber of Commerce (WBCC) is the British Chamber of Commerce's (BCC) accredited Chamber for the West Berkshire area. WBCC are part of the Thames Valley Chamber of Commerce Group (TVCC) which covers Heathrow and the Thames Valley corridor from West London to Swindon which collectively represents over 4,000 businesses and 5,000 active trade customers as part of its wider membership, many of whom have business interests or are represented in the West Berkshire area. TVCC is recognised as the leading voice of business representing micro to major multi-international organisations and is a centre of excellence providing international trade services and global representations committed to long term relationships with its members and providing them with relevant value-added services that assist, support and protect regional, national and international business.
- 1.2. Whilst West Berkshire is located in the western end of the South East region, WBCC firmly believes that in economic terms the area is very much aligned to London and the South East, particularly the heart of the Thames Valley and including strong linkages with Oxfordshire to the north and Hampshire to the south as well as the rest of Berkshire and Buckinghamshire.

WBCC's Engagement in the Development Plan Process

- 1.3. TVCC, on behalf of WBCC, has played a key part in the Development Plan and planning process over many years at a national, regional and local level. During that time, it has submitted representations and appeared at Public Examinations throughout the Thames Valley and surrounding area. As noted in Section 1 of these representations above, WBCC's economic hinterland extends extensively not only into Swindon and Wiltshire to the west but also into Hampshire and Oxfordshire to the south and north respectively and the rest of Berkshire (Reading, Bracknell and Wokingham) to the east and further east towards London Heathrow airport. Our representations have been made in these areas as gauged appropriate to WBCC's member interests.

Business Manifesto and Local WBCC Policy Priorities

- 1.4. Attached to these representations are copies of the TVCC Business Manifesto and the WBCC Local Policy Priorities Statement which set out both the business agenda sought by the Thames Valley Chambers generally and the policy priorities for the WBCC area. These are not repeated in the representations, but we would request that they form an invaluable reference source that should be read in connection with these representations to set and establish their full context.

2.0 Comments on Local Plan Proposed Submission

- 2.1. This section sets out the Chamber's comments on the soundness of the proposed Local Plan and the proposed modifications to it.

Soundness

- 2.2. The Chamber broadly supports Policy SP20 which states that **"The redevelopment and regeneration of existing employment sites for business uses will be supported"**, however this single line of text does not go into sufficient depth on how this will be achieved in line with NPPF policies pertaining to sustainable development. As a result, policy SP20 of the Proposed Local Plan could be considered not to be **justified** in accordance with the NPPF. This is exemplified by the Council's approach to the London Road Industrial Estate (LRIE), referenced in supporting paragraph 7.10 of the Local Plan which states the following:-

"7.10 The ELR is clear that the industrial requirement of 91,109sqm is a minimum and therefore the regeneration of the London Road Industrial Estate (LRIE) will provide flexibility to the figures in the later part of the plan period. The redevelopment and regeneration of the LRIE is a long held vision of the Council and a recent decision by the Council's Executive (June 2022) agreed a new approach for the site which focuses on job creation, attracting investment to Newbury and achieving carbon neutrality. The site has scope, subject to overcoming other policy constraints, for regeneration and the intensification of employment uses to maximise the potential of the site, which at present is not optimum and does not provide an attractive environment for modern day use. The majority of the LRIE site falls within the London Road Industrial Estates DEA, an area designated for business uses. It is important to note that the DEA includes the majority of the Council owned LRIE and the adjoining Riverpark Industrial Estate but excludes the football ground. A key aspiration of the regeneration is to increase the type and level of employment opportunities on the site through intensification and more efficient use of brownfield land. The Council are currently preparing a comprehensive strategy for the delivery of regeneration on the LRIE site. Due to the timing of this strategy and the site's location within the settlement boundary of Newbury, the site has not been identified as a site allocation, however it does need to be recognised as an area of regeneration for its potential to deliver flexibility to the employment figures over the plan period."

- 2.3. The Council's current strategy for the regeneration of the LRIE is outlined within the London Road Industrial Estate Project Refresh report (Ref. EX4219), dated 9th June 2022. It seeks to create an LRIE Supplementary Planning Document (SPD) for the redevelopment of the site, rather than, for example, a site specific Local Plan allocation and accompanying Policy. It also provides a timeline for delivery, estimating the adoption of the SPD by the end of 2024, with both the depot site and playing field site redeveloped for employment use by 2026.
- 2.4. The reason that the policy might be considered not **justified** as it is not an appropriate strategy, and neither is it backed up by proportionate evidence. The redevelopment of a site the scale of LRIE, either comprehensively or through a series of linked and phased proposals, would be subject to significant detailed EIA work, due to several important constraints at the site, including flood risk, traffic etc. and should the site be developed in a piecemeal fashion

then the appropriate strategic environmental investigation is likely not to occur and subsequent development will have to rely upon cumulative development requirements of the EIA Regulations 2027.

- 2.5. While this approach is consistent with national policy, the following paragraphs set out the Chamber's recommendations to bring even further in line with national guidance and to ensure that the policy is positively and sustainably delivered.
- 2.6. In order to establish criteria to ensure that development or redevelopment of the site is sustainable, a comprehensive development-plan led policy framework which has been subject of Strategic Environmental Assessment (SEA) is suggested, an approach which does not appear to have been considered by West Berkshire Council. An SPD-led approach such as that proposed to be used for the LRIE site may not be able to achieve this and likely would not constitute an appropriate alternative.
- 2.7. Whilst LRIE is somewhat unique in the particular constraints that apply to that site, it highlights the need for the aforementioned development-plan led policy framework across the district's principal employment areas to avoid unsustainable piecemeal development. Specific criteria-based policies for the principal employment areas should be written in a manner that encourages inward investment and provides an appropriate and positive policy context for the necessary infrastructure improvements.
- 2.8. We would like to see greater depth, into the policy approach, to securing – and ensuring – West Berkshire retains and identifies new employment land of sufficient quality and in locations that are attractive to investors to meet current and future needs.
- 2.9. In 2020 the AWE Burghfield Detailed Emergency Planning Zones (DEPZ) was extended under new REPPiR 19 legislation. We understand there are potentially serious implications on employment land within the zone, including sites in Newbury, Theale, Aldermaston and nr Reading (Green Park). The Chamber would like to suggest that this should be seriously considered within the Local Plan and that the Council should work proactively with the AWE establishments to determine the full extent of any potential employment land impacts.

Proposed Modifications

- 2.10. In order ensure that the Local Plan is seen to be considered sound, the Chamber proposes the following modifications to facilitate an appropriate approach to development or redevelopment proposals at Designated Employment Areas across the district.

Site/Area Specific Policies

- 2.11. The Chamber supports the West Berkshire Council's aim of intensifying employment uses, along with the redevelopment and regeneration of existing employment sites for business uses. However, in order to ensure that proposals for this constitute sustainable development and are of sufficient quality to attract inward investment, the Chamber proposes that a series of positive and criteria led site-specific policies are included in the Local Plan for each Designated Employment Area, which consider the relevant constraints and characteristics of

each site. Continuing to use LRIE as an example, the following criteria would have to be included in any site-specific policies:-

- **Flood Risk:** The majority of the site is within Flood Zone 3, meaning a high risk of flooding. Any proposals for use or change of use should be required to undertake a sequential test in accordance with Policy SP6 Flood Risk. Stormwater attenuation measures and already existing opportunities to mitigate against the effects of flooding on site or in the vicinity should be considered positively. The size of LRIE is such that in the context of a comprehensive or phased redevelopment it would undoubtedly constitute EIA development within the context of the EIA Regulations 2017 and therefore requires a development plan i.e. site specific Local plan policy framework to set out the criteria that need to be addressed and met if sustainable redevelopment proposals are contemplated.
- **Climate Change:** Given the ongoing climate crisis, and especially the already measured and predicted effects of climate change in relation to weather & flooding, it is of paramount importance that any proposals for development or redevelopment in LRIE should satisfy the criteria of Policy SP5 Responding to Climate Change and any appropriate requirements that may be introduced by site specific Local Plan policy.
- **Biodiversity:** In line with the requirements of the Environment Act 2021, any development should be required to demonstrate a 10% Biodiversity Net Gain, meeting the requirements of Policy SP11 Biodiversity and Geodiversity.
- **Traffic Generation:** As any intensification of employment use at the site would result in increased amounts of traffic from the site, a set of criteria should be developed to ensure that the impacts of this are fully understood and mitigated against.
- Other site specific policy criteria should also be introduced to control the design, height, massing and land use mix of development or redevelopment proposals as may be appropriate.

- 2.12. These policies should clearly show the boundaries of the Designated Employment Areas with reference to the Proposals Map or other insert map as may be appropriate.
- 2.13. We do not believe it is the Chamber's responsibility to define the specific wording of the policies however we do believe that they would be effective in guaranteeing sustainable development and attract inward investment across West Berkshire's Designated Employment Areas.

Policy SP21 Sites Allocated for Employment Land

- 2.14. The Chamber supports the allocation of additional land for employment as part of this policy, and inclusion of criteria based specific allocations for these sites, in line with the latter half of the Local Policy Priority of ***"Maintaining support to existing exporters and helping new businesses grow their trade activity"***, and the general objective of attracting inwards investment and regeneration in a post-Brexit economy.

Policy SP22 Town and District Centres

- 2.15. The Chamber supports the Council's goal of maintaining and enhancing the vitality and viability of West Berkshire's town and district centres, in line with the stated Local Policy Priority of ***"Supporting initiatives that re-imagine Newbury town centre encourage***

appropriate levels of investment and active town centre management that will help secure their future vitality, vibrancy, and employment opportunities”.

- 2.16. However, the policy is somewhat lacking in the re-imagination element of the Priority and could do more to ensure that Newbury town centre, as well as other town centres across West Berkshire, remain dynamic and can retain their retail offer and attract inward investment.

Policy SP5 Responding to Climate Change

- 2.17. The Chamber supports the Council’s commitment to responding to the ongoing climate emergency, and agrees with the criteria set out within this policy. This is in line with the Chamber’s stated Local Plan Priority of ***promoting “initiatives that support a green recovery, and proposals that are helping to build a local economy centred around net-zero, sustainability principles and social purpose”***. However, the policy could provide greater clarity on the thresholds for each criteria.

Policy SP10 Green Infrastructure

- 2.18. The Chamber supports the commitment to protecting and enhancing existing Green Infrastructure assets across the district, recognising the value that they can bring on a range of factors.
- 2.19. The Chamber particularly supports the inclusion of amenity green space, such as outdoor sports facilities, as a type of green infrastructure asset, as maintaining and improving the health and happiness of the district’s citizens is a mutually beneficial process which also helps local businesses.
- 2.20. Again, using LRIE as an example, the Chamber is aware of the ongoing controversy surrounding the Faraday Road Football Ground (including its inclusion as a site for development in the Refresh Report), and would like to highlight it as a great example of important green infrastructure of considerable merit. The Chamber therefore fully supports the retention of the football ground for community sport use and as a key green infrastructure asset. This would also be a further example where a site specific policy would give certainty of the retention of this highly valued community facility.

SP23 Transport

- 2.21. The Chamber supports the application of the criteria in Policy SP23 to development which generates a transport impact, in line with the Chamber’s Local Plan Priority of ***“supporting appropriate local transport initiatives that strengthen confidence in travelling by public transport and lead to its sustained recovery”***. Furthermore, the policy should be referenced in any proposed site specific criteria for designated employment areas.

DM32 Designated Employment Areas

- 2.22. The Chamber supports the general ambition of Policy DM32 in so far as it seeks to support and expand business in West Berkshire. The Chamber also supports redevelopment and

regeneration of land within DEAs to provide additional business development where it is needed, including the statement in supporting text paragraph 12.7 that this is to be supported to attract inward investment.

- 2.23. However, in line with previous representations on Policy SP20, the Chamber believes that this policy could go even further in setting out a positive strategy for the future of the Designated Employment Areas which would guarantee appropriate development or redevelopment and help ensure the best conditions for attracting inwards investment are created.
- 2.24. Therefore, the Chamber would like to reiterate earlier comments that a development-plan and SEA led framework of positive, criteria-led site specific policies for each Designated Employment Area should be included within the Local Plan.

DM39 Local Community Facilities

- 2.25. The Chamber supports the Council's stated aim of retaining local community facilities, **only** permitting proposals which would result in the loss of an existing local community facility subject to the **clear demonstration** of the criteria contained within this policy.
- 2.26. The Chamber would like to stress the importance of local community facilities, not just for the citizens of West Berkshire but also for the local economy. Good health, happiness and wellbeing in the workforce increase productivity, alongside the great benefits they have for individuals.

3.0 Conclusion

- 3.1. These representations have outlined West Berkshire Chamber of Commerce's concerns as to the soundness of the Local Plan preparation process. The primary concern of WBCC is that the proposed policies regarding designated employment areas, in particular SP20 as exemplified by the Council's approach to LRIE, are unsound and do not go far enough to ensure that the development or redevelopment of DEAs across the district is sustainable and creates the best conditions for attracting inward investment. This is as well as the policies potentially not being appropriately justified. As they are, the policies run the risk of enabling piecemeal development at Designated Employment Areas which would result in a lower quality of land available for business use as well as potentially resulting in vital environmental investigation not being able to take place.
- 3.2. As such, various modifications have been proposed to ensure the soundness of the Local Plan. Most importantly, a development-plan and SEA led framework of criteria-based site specific policies for each DEA should be adopted which would guarantee that development or redevelopment is sustainable and can create the best conditions for inwards investment and regeneration. There have also been several wider minor comments and representations on other policies throughout the Local Plan.
- 3.3. To conclude, these representations have concluded that the Proposed Local Plan is potentially unsound and we therefore respectfully request that the sentiments of these representations be fully considered and reflected in further Modification to the submitted Local Plan.



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Thames Valley Chamber of Commerce Group