

Comment

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Your comments on the Cold Ash NDP

Please set out your comments regarding the Cold Ash Neighbourhood Development Plan (NDP) and specify which page / paragraph / policy / appendix they relate to

Dear Sir / Madam,

Cold Ash Neighbourhood Plan (Regulation 16 version) – Consultation representations

Rectory Homes welcomes the opportunity to comment on the Regulation 16 (proposed submission) version of the Cold Ash Neighbourhood Plan and wishes to make a number of representations as set out below.

Established in the 1990s, Rectory is a small-medium sized housebuilder operating in Oxfordshire, Buckinghamshire, Berkshire and the wider Home Counties. Our focus is on small to medium sites in towns and villages and we specialise in high quality housing developments built to reflect the local vernacular using locally sourced natural and sustainable materials.

We have an interest in the existing and emerging planning policies for Cold Ash having secured a land option for a site at New Farm, The Ridge. Small sites are extremely important in rural areas such as West Berkshire, especially as they can be delivered quickly; small schemes generate little adverse impact and can deliver a range of positive benefits to local communities.

Our representations are as follows:

Housing Requirement

Rectory Homes notes the Neighbourhood Plan does not allocate any sites for housing given the West Berkshire Local Plan Review does not identify a housing requirement for Cold Ash.

The West Berkshire Local Plan Review is currently at Examination with hearing sessions expected to take place between September to November 2023. As such, there is scope for the emerging Local Plan to be amended as required dependant on the Inspector's conclusions following the hearing sessions.

Rectory Homes submitted representations to the Regulation 19 version of the West Berkshire Local Plan review. In particular, we have cited concerns regarding the approach to housing delivery within the emerging Plan on the following grounds:

- The Plan sets a range of homes to be delivered within the Plan period but does not definitely state what the minimum housing requirement is;
- The Plan makes no provision to assist with delivering the identified unmet housing need from Reading Borough Council;
- Based on the Council's anticipated trajectory of housing supply, upon expected adoption of the Plan in 2024/25 the housing land supply will be marginal, allowing very little scope to account for any delays in the delivery of sites;
- As a result of the above, there is a possibility that the Plan may be out-of-date shortly after adoption and therefore a larger than 5% buffer to the housing requirement should be incorporated to account for any unforeseen delays to the delivery of housing;
- Approximately 20% of the Council's supply is anticipated to comprise the delivery of windfall sites. There is no certainty that this level of windfall sites will be delivered and therefore more sites should be allocated for housing.

Given the conveyed concerns regarding the Council's approach to housing delivery, it is clear that additional sites will need to be identified for allocation in order to provide a Plan that is positively prepared and sound. There are opportunities within the Newbury and Thatcham sub-area to provide a mix of additional large and small site allocations within the settlements of Newbury and Cold Ash to provide a robust strategy on housing delivery. As such, there is a high probability that through the examination of the West Berkshire Local Plan Review it is established that Cold Ash will need to allocate sites for housing within the Neighbourhood Plan.

We consider the site at New Farm, The Ridge in Cold Ash to be an appropriate location for small-scale infill development of new homes. The site could be developed in a linear form to reflect the existing settlement pattern along The Ridge and be landscape-led in its design to minimise any impacts on the AONB. The site therefore has the potential to provide a sensitively designed and high quality housing scheme in a mixture of private and affordable tenure dwellings which reflects local housing needs.

Policy CAP1: Location of Development

Rectory Homes considers the criteria in part 2 of the policy which provides circumstances in which development proposals outside of the established settlement boundaries to be too restrictive. In reality, a very limited amount of sites would be receive support from the policy when assessed against the criteria as currently drafted. Given the housing strategy within the West Berkshire Local Plan Review relies on 20% of the housing requirement being delivered on windfall sites, planning policies which relate to the location of housing should be flexibly worded and with a broader range of circumstances in which proposals can receive policy support.

One such suggested addition would be to include a criterion which allows for the development of infill sites outside the defined settlement boundaries if the proposal would reflect the existing settlement pattern and such sites are already substantially enclosed (on at least three sides) by existing built form. This would enable the delivery of a greater number of homes on windfall sites that are generally appropriate locations for development.

Policy CAP2: Local Character and Heritage

Rectory Homes are advocates of good design and we pride ourselves on the delivery of new homes which reflect the local vernacular and the character of an area and assimilate readily within the landscape with limited adverse impacts. As such, we are supportive of the general thrust and principles of Policy CAP2.

However, part B iii. of the policy is not entirely consistent with the NPPF. The policy requires development proposals to enhance the significance and setting of an asset however this is not always possible. The Framework is more flexibly worded, stating at Paragraph 197 local planning authorities

should take account of the desirability of sustaining and enhancing the significance of heritage assets. It does not explicitly require development proposals to result in an enhancement of the significance and setting of a heritage asset.

In fact, the NPPF even sets out circumstances in which development proposals can be supported even where it has been established that there will be harm to a heritage asset. Depending on the level of harm considered, paragraphs 201 and 202 of the NPPF provide the policy tests where development can be supported.

As such, part B iii. of Policy CAP2 should be re-worded to remove any reference to proposals needing to enhance the significance and setting of a heritage asset as such assets are already afforded due protection through the NPPF and with appropriate policy tests. Instead, the policy should require the provision of a Heritage Statement with every planning application for development which is considered to / or has the potential to, affect a heritage asset. This will ensure any impacts of a proposed development will be appropriately considered.

Policy CAP3: Design of Development

Rectory Homes are supportive of this policy.

Policy CAP4: Sustainable Design

Whilst generally supportive of the principles of this policy, part d. is not specific enough in what is required. As currently drafted, it is unclear exactly what constitutes 'low carbon sustainable design' and what is meant by 'avoid or mitigate all regulated emissions by following the energy hierarchy.' The policy is not specific enough for an applicant or indeed the decision maker to be certain of what is expected. This is contrary to Paragraph 16 of the NPPF which requires local planning policies to be unambiguous.

Policy SP5 of the West Berkshire Local Plan Review had similar issues in requiring 'all development to achieve the highest viable levels of energy efficiency.' Such an approach will require a viability assessment to be submitted with every planning application, leading to further delays due to negotiations regarding what level of efficiency can be achieved.

Rectory Homes are committed to responding positively to climate change and we strive to make improvements to the efficiency of our development schemes where possible. It is our position therefore that the most effective way of achieving more energy efficient housing is through the application of building regulations and implementation of the Future Homes Standard. This provides a clear and universal set of requirements providing certainty to developers from the outset.

We therefore suggest part d. is either re-written to be clearer in what is expected and required, with appropriate justification and compliance with adopted and emerging planning policy or removed from the policy altogether.

Policy CAP6: Biodiversity and the Network of Green and Blue Infrastructure

Rectory Homes are supportive of this policy.

Policy CAP8: Iconic Views

Rectory Homes acknowledges the purpose of Policy CAP8 in protecting important public views across the Neighbourhood Plan area. On this basis, Rectory Homes are supportive of the policy. However, such views must undoubtedly be from publicly accessible areas and legitimate in order to benefit from protection under Policy CAP8.

Rectory Homes notes that Viewpoint 2 extends over the area of land known as Land at New Farm, The Ridge. Figure 13 within the Neighbourhood Plan shows this perceived view on plan form as taken from the point along The Ridge where the road meets the private road serving The Birches and The Holding and the Public Right of Way which extends to the northwards.

Appendix B to the Neighbourhood Plan forms photos showing each iconic view deemed worthy of protection. The photo included for viewpoint 2 (From The Ridge across Westrop Farm and Westrop Gulley) does not accurately reflect any public viewpoints from The Ridge or any other publicly accessible location within the immediate area. The site at New Farm, The Ridge is not publicly accessible and the site boundary with The Ridge is formed of mature trees – albeit, this boundary is 'gappy' in places and there is an agricultural field gate located at the north-western corner of the site which does permit

some views across the site from these points. However, the photo enclosed at Appendix B in the Neighbourhood Plan does not represent any achievable public views from these locations.

We would therefore appreciate clarification on where exactly the photo shown at Appendix B for viewpoint is taken from. It would appear from the photo that it has been taken from within the site itself which is private land and from an elevated position. If this cannot be suitably evidenced, Viewpoint 2 as currently shown should be removed from Policy CAP8.

We trust you will consider the above representations and look forward to receiving your formal acknowledgement.

Yours faithfully

Steven Kerry MPlan MRTPI

Associate Planning Director

Notification of progress of the Cold Ash NDP

- Do you wish to be notified of any of the following?**
- . Publication of the Examiners report / Decision to progress to referendum
 - . Decision to adopt the Cold Ash NDP