

Comment

Consultee	Alexander Anderson (1257697)
Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Alexander Anderson (1257697)
Comment ID	PS274
Response Date	02/03/23 15:34
Consultation Point	Policy SP 21 Sites Allocated for Employment Land (View)
Status	Processed
Submission Type	Web
Version	0.3
Bookmark	Anderson, Alexander

1. Do you consider the Local Plan Review is legally compliant?

Please see the guidance note for an explanation of what 'legally compliant' means

Yes

2. Do you consider the Local Plan Review is sound?

Please see the guidance notes for an explanation of what 'soundness' means.

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

Please tick all that apply:

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development. . No

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . No

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . Yes

Please give reasons for your answer

I am particularly concerned that no Environmental Impact Assessment has been carried out on the Membury Industrial site which has expanded hugely, especially over the previous eight years.

This has led to an intolerable increase in the traffic on this rural road network which affords no regard for the residents who live here. There is no public transport in the area, which along with a complete lack of cycle lanes, means that the impact on the traffic on the network is beyond its capacity. These roads are dangerous and further development will only increase this danger.

The economic arguments for increasing the industrial development at Membury do not outweigh the environmental impact on the local environment. This is an ANOB, yet that does seem to be taken into consideration when driving the industrial development on. Indeed it seems to go against the Government's desire to protect these areas leading to the rural character of this area being destroyed.

3. Do you consider the Local Plan Review complies with the Duty to Co-operate?

Please see the guidance note for an explanation of what 'Duty to Cooperate' means.

No

Please give reasons for your answer

(25). Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).

I would suggest that the local community and local nature partnerships have not been consulted with reference to the industrial development at Membury.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A full Environmental Impact Assessment needs to be carried out on the whole of the Membury Industrial Site before further development, which expands onto the ANOB, is allowed.

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply

**The submission of the Local Plan Review for
Independent Examination**

**The publication of the report of the Inspector appointed
to carry out the examination**

The adoption of the Local Plan Review

Comment

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Email Address	[REDACTED]
Address	[REDACTED] [REDACTED] [REDACTED] [REDACTED]
Event Name	Proposed Submission (Reg 19) West Berkshire Local Plan Review 2022-2039
Comment by	Alexander Anderson (1257697)
Comment ID	PS536
Response Date	02/03/23 15:34
Consultation Point	Policy ESA 2 Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site Ref: LAM6) (View)
Status	Processed
Submission Type	Web
Version	0.3
Bookmark	Anderson, Alexander

1. Do you consider the Local Plan Review is legally compliant?

Please see the guidance note for an explanation of what 'legally compliant' means

Yes

Please give reasons for your answer

I have said yes here as i do not feel (having no legal background) able to comment otherwise.

2. Do you consider the Local Plan Review is sound?

Please see the guidance notes for an explanation of what 'soundness' means.

The soundness of the LPR should be assessed against the following criteria from the National Planning Policy Framework (NPPF).

Please tick all that apply:

Positively Prepared: The plan provides a strategy which, as a minimum, seeks to meet the area's objectively assessed need and is informed by . No

agreements with other authorities, so that unmet need from neighbouring areas is accommodated where practical to do so and is consistent with achieving sustainable development.

Justified: the plan is an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence. . No

Effective: the plan is deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. . No

Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies of the NPPF. . No

Please give reasons for your answer

I am particularly concerned that no Environmental Impact Assessment has been carried out on the Membury Industrial site which has expanded hugely, especially over the previous eight years. This has led to an intolerable increase in the traffic on this rural road network which affords no regard for the residents who live here. There is no public transport in the area, which along with a complete lack of cycle lanes, means that the impact on the traffic on the network is beyond its capacity. These roads are dangerous and further development will only increase this danger.

The economic arguments for increasing the industrial development at Membury do not outweigh the environmental impact on the local environment. This is an ANOB, yet that does seem to be taken into consideration when driving the industrial development on. This is in direct contradiction to DC32 points i, ii and viii

Indeed it seems to go against the Government's desire to protect these areas leading to the rural character of this area being destroyed. See DC35 section h:

It would not generate traffic of a type or amount inappropriate for the rural roads, byways or restricted byways affected by the proposal or require improvements to these roads.... which could be detrimental to their character.

Please give reasons for your answer

25). Strategic policy-making authorities should collaborate to identify the relevant strategic matters which they need to address in their plans. They should also engage with their local communities and relevant bodies including Local Enterprise Partnerships, Local Nature Partnerships, the Marine Management Organisation, county councils, infrastructure providers, elected Mayors and combined authorities (in cases where Mayors or combined authorities do not have plan-making powers).

This has been taken from the accompanying documents to the plan in order to justify my comments in this section.

I would suggest that the local community and local nature partnerships have not been consulted with reference to the industrial development at Membury.

Also as stated in Policy ESA3 section h:

Development will be informed by a Flood Risk Assessment, which will include flood mitigation measures including SuDS.

4. Proposed Changes

Please set out what change(s) you consider necessary to make the Local Plan Review legally compliant or sound, having regard to the tests you have identified above (Please note that non-compliance with the duty to co-operate is incapable of modification at examination).

You will need to say why this change will make the Local Plan Review legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

A full Environmental Impact Assessment needs to be carried out on the whole of the Membury Industrial Site before further development, which expands onto the ANOB, is allowed. This whole area has been subject to piecemeal development over which no-one has an overview of the true impact. The effect on this ANOB is devastating and must be reviewed properly.

5. Independent Examination

If your representation is seeking a change, do you consider it necessary to participate at the examination hearing session(s)? No

6. Notification of Progress of the Local Plan Review

Do you wish to be notified of any of the following?

Please tick all that apply

- | | | |
|----------------------------------------------------------------------------------------------|---|-----|
| The submission of the Local Plan Review for Independent Examination | . | Yes |
| The publication of the report of the Inspector appointed to carry out the examination | . | Yes |
| The adoption of the Local Plan Review | . | Yes |