

**INDEPENDENT EXAMINATION OF THE LAMBOURN
NEIGHBOURHOOD DEVELOPMENT PLAN**

EXAMINER: Andrew Mead BSc (Hons) MRTPI MIQ

Examination Ref: 02/AM/LNP

EXAMINER'S QUESTIONS:

Q3: WBC has suggested detailed amendments to Policies L1, L2, L6, L7, L8, L9, L13, L16, L17 and L18. Please may I have the comments of LPC to those suggestions?

General comments on WBC's response to the Regulation 16 Consultation.

LPC would like to thank the teams at WBC for their thorough review of the Submission Version of the Lambourn Neighbourhood Development Plan (LNDP). It has been a very useful exercise to go through the comments made, and understand the reasons for the suggested amendments.

It has become clear that, in some instances, the results from the local consultations on the LNDP are at odds with WBC's perceptions and the LPR does not represent the needs of the local community. Where this is felt to be the case, LPC has endeavoured to give an explanation and include locally specific examples.

With regard to suggested amendments to the Supporting Text of Policies, LPC has made some comments, but in general if LPC supports an amendment, then the related amendments to the Supporting Text are also supported. LPC does not support amendments to Supporting Text that relate to Policy changes it does not support.

KEY

Black: Original text in Plan

Red underlined : WBC suggested amendments

~~Black ruled through~~: WBC suggested deletions

Blue: LPC comments on WBC amendments

Suggested Amendments to: Policy L1 Landscape Character

1. Development proposals ~~should~~ **must** demonstrate how they conserve or enhance the landscape character of the Parish, ~~taking into consideration~~ and **accord with** the recommendations of the Lambourn Design Code ([Appendix G](#)).

LPC supports these suggested amendments, which strengthen the Policy

2. Proposals ~~should~~ **must** reflect the characteristics and features which define the seven local landscape character areas (see Appendix E and F), which are as listed below:

- a. LCA 1 – Open Chalk Downland.
- b. LCA 2 – Wooded Downland.
- c. LCA 3 – Membury Airfield.
- d. LCA 4 – Ermin Street.
- e. LCA 5 – Lynch Wood.
- f. LCA 6 – Lower Lambourn Valley Floor.
- g. LCA 7 – Upper Lambourn.

LPC supports these suggested amendments

3. It ~~should~~ **must** be demonstrated how consideration has been given to:

a) **Avoiding harm to, and where possible enhancing, the** Protection of the historic pattern of watercourses, woodland, grassland, and **designated or locally important** ~~existing~~ wildlife sites as shown in Figures 29 and 30.

LPC supports these suggested amendments

b) **Protecting and where possible, enhancing** ~~Preservation of~~ important views into and out of the settlement as shown in Figure 24.

LPC supports these suggested amendments

c) ~~Enhanced access to, and appreciation of,~~ **Providing or enhancing access to** the Downland Landscape (see Figure 12), **including improvements to walking, cycling and, where relevant, equestrian connections, where these are proportionate to the scale and location of development** ~~by improving connectivity.~~

LPC partially supports these suggested amendments. Based on local consultation, the scale and location of a development are not relevant factors in Parishioners' desire to access the Downland landscape.

d) **Managing the impact of non-rural uses. Proposals for** ~~Minimising the impact of~~ intensive and industrial ~~or~~ storage uses ~~on the landscape outside of the Designated Employment Areas (DEA)~~ **must demonstrate that they will not result in unacceptable harm to the landscape.**

LPC supports these suggested amendments

e) ~~The provision of suitable landscaping and screening to those sites within the DEA, with longer term management conditions.~~ **Incorporating appropriate layout, scale, design and landscaping (including screening and long-term management) to ensure they will not result in unacceptable harm to landscape character.**

LPC does NOT support the deletion of this criterion. The suggested wording loses the reference to the DEA and weakens the Policy. Following locally-expressed concerns, this point was specifically aimed at development in the DEA, so that applicants could demonstrate long-term management had been considered.

f) **Avoiding or appropriately mitigating adverse effects on** ~~Mitigating the harm~~ to the landscape character arising from ~~the~~ intensification of existing and new recreational uses located outside or on the edge of the settlement.

LPC supports these suggested amendments

Suggested Amendments to: Policy L2 Development within the North Wessex Downs

Development proposals within the Parish should **must:**

LPC supports this amendment, and the replacement of “should” with “must”, as suggested elsewhere.

~~1. Preserve the unique character and beauty of the North Wessex Downs National Landscape, whilst allowing for appropriate and sustainable development that respects the settlement heritage and natural environment.~~

LPC would like to retain this in some form. Could the Policy begin thus?:

In order to conserve the unique character and beauty of the North Wessex Downs National Landscape, whilst allowing for appropriate and sustainable development that respects the settlement heritage and natural environment, development proposals within the Parish must:

~~2~~ **1.** Conserve the Downland landscape in the transitional areas between areas of development and open landscape. Development at the edge of settlements must provide a gradual and well-integrated transition to the surrounding countryside and accord with the Lambourn Design Guide (Appendix G).

Development around the DEA and in some other areas of the Parish is not "at the edge of settlements" but a "gradual and well- integrated transition to the surrounding countryside" would be appropriate for both scenarios. The reference to Appendix G, as in criterion 9, (suggested for deletion) strengthens the Policy.

~~3. Be subject to rigorous environmental impact assessments to ensure they do not adversely affect the area's ecological integrity.~~

Whilst recognising the legislation governing EIAs, this criterion was included due to the community's concerns about how EIA requirements and biodiversity policies have apparently been circumvented by applicants. The "salami slicing" of parcels of land reduces the need for EIAs, whilst claims of biodiversity net gain seem to offer little demonstrable improvement. LPC sought to find a form of words which would ensure the impact of development on the environment was investigated with due diligence, especially given the requirements of the LNRS, within the National Landscape.

~~4~~ **2.** Respect and maintain the existing pattern of discrete, well landscaped villages and residential hamlets within the National Landscape must be maintained. Retain, conserve and, where possible, enhance characteristic tree cover, woodland, hedgerows, and the sylvan setting which contributes to the visual containment of built form.

This changes the emphasis of the original criterion, removes the reference to the National Landscape, and diminishes the local "voice". The settlement patterns within the Parish are noted in the Lambourn Parish Character Appraisal (Appendix E). Perhaps: *Retain and conserve the existing pattern of discrete, well-landscaped villages and residential hamlets within the National Landscape?* See also criterion 8, below

~~5. Reflect the constraints of the undulating natural topography of the area (see Figures 11 and 12) and the visibility of buildings on higher ground which could adversely impact the wider area. Membury in particular is one of the highest areas in the Parish and subject to most of the proposals for large scale, tall building development. Tall buildings in locations that are more than 195m AOD (hilltop) are likely to be highly visible in the landscape and are therefore unlikely to be acceptable.~~

LPC would wish this criterion to be included. Concern about the height and visibility of buildings on higher ground was expressed during local consultations. This criterion, with its specific

reference to Membury, was included to address this concern. The Design Code (Appendix G), also makes reference to topography and the height of buildings. This Policy reflects the community's desire to learn from previous developments where building heights have had an adverse impact on the National Landscape and local character. It seeks to ensure that future development responds positively to locally expressed views and aspirations, maintaining the distinctive identity of the neighbourhood while accommodating appropriate growth

~~6 3. Respect the context of buildings within each settlement, including the gradient of the valley and the height of surrounding Downland~~ Are sensitively sited and designed to respond to the Parish's downland topography (refer to Figures 11 and 12), valley form and elevated skylines, avoiding visually prominent or intrusive development, particularly on higher ground and ridge lines

LPC supports this suggested amendment and notes the attempt to reference the deleted criterion 5, but feels a better form of words could be found. Does the suggestion also incorporate the former criterion 7?

~~7 Refer~~ Development proposals must accord with to the Lambourn Design Code (see Appendix G), which establishes an average building height within each character area and assesses the topography. Any deviation from these average heights must be justified.

~~8 Respect natural tree canopy and coverage. Development that causes significant harm to any areas of established sylvan character will not be supported.~~

LPC wishes to retain reference to tree canopy. Could this be done within criterion 4? E.g. *Retain and conserve the existing pattern of discrete, well-landscaped villages and residential hamlets within the National Landscape. Where possible, enhance characteristic tree cover, woodland, hedgerows, and the sylvan setting which contributes to the visual containment of built form. Development which causes significant harm to any areas of significant sylvan character will not be supported.*

~~9. Respect the edge of settlement area to ensure that development transitions seamlessly into the surrounding landscape (see Appendix G).~~

See LPC response to criterion 2/**1**.

Suggested Amendments to: Policy L6 River Lambourn

1. The River Lambourn holds great ecological and environmental significance to both the local community and wider country. In addition to being designated as a SAC under the Conservation of Habitats and Species Regulations 2017, most of the river is also designated as a SSSI.

LPC would like to retain this to give context to the Policy, and emphasise how special the River Lambourn is.

21. Safeguarding the River Lambourn is crucial and consideration must be given to conserving its natural resources and promoting sustainable practices, ensuring lasting benefits for both the local environment and future generations. This includes the following aspects:

- a) Development proposals adjacent to the River Lambourn must prioritise the protection and enhancement of the waterside character, heritage value and setting of the river.
- b) Proposals should seek to maintain the low-key and informal nature of the river and its tributaries and streams to preserve their natural charm.
- c) Proposals adjacent to the river will be supported where they do not pose significant adverse impacts on increase flood risk to safeguard nearby communities and properties on-site or elsewhere, having regard to policy L9.

LPC supports these suggested amendments

- d) Proposals which include development alongside the river, or the change of use of land alongside the river, must ensure demonstrate that there is will be no adverse impact upon the riverbank and that or the riparian environment, including from is not harmed by any future use or management

LPC supports these suggested amendments

- e) New developments should also provide maintain or enhance physical and visual links with surrounding areas, including views along the river, to promote connectivity and integration with the landscape.

LPC supports these suggested amendments

- f) ~~Proposals~~ Development ~~will be supported when consideration is given to~~ must, where appropriate and proportionate to its scale, improve the quality of and links to riverside access to and connectivity along the river corridor, and including links to Public Rights of Way ~~to enhance accessibility and recreational opportunities.~~

LPC supports these suggested amendments

- g) Major developments within the defined riverside corridor must be accompanied by a landscape and visual impact assessment to demonstrate that proposals will not result in adverse landscape and visual effects.
- h) Proposals within the river corridor must seek to protect and enhance it as a valuable resource for biodiversity and wildlife, functioning as a wildlife corridor to promote ecological connectivity
- i) Proposals should respect and enhance the winterbourne nature of the watercourse, recognising its seasonal variations and ecological significance.
- j) Consideration should be given to how applications may adversely impact upon dry riverbeds (including where incorporated into garden areas and their access).
- k) Where possible SuDS schemes should be designed to contribute towards the landscaping and biodiversity of the River Lambourn, in addition to supporting appropriate use of the river.
- l) ~~Development proposals will only be supported if they can achieve Nutrient Neutrality regarding the River Lambourn.~~

LPC agrees (l) should be deleted. Policy DM6 does say development within the catchment of the River Lambourn "will be required to demonstrate Nutrient Neutrality", although that could be

mitigation actually delivered elsewhere. LPC would like to see mitigation delivered in the Parish if possible.

m) Applications for development that will result in a net increase in phosphorous reaching the River Lambourn will be required to confirm the phosphorous budget and set out specific and appropriately located mitigation measures that will be implemented to ensure development is nutrient neutral from the start of its ~~operational phase~~ occupation.

Is it possible phosphorous could reach the river prior to occupation, i.e. during the construction phase? If not, LPC would support this amendment.

Suggested Amendments to: Policy L7 Biodiversity

Supporting text:

LPC supports the use of full terminology, rather than acronyms, in 6.7.2, pg 48 and elsewhere: SAC Special Area of Conservation; SSSI Sites of Special Scientific Interest.

LPC supports the replacement of footnote 8, pg 53, with: The Berkshire Local Nature Recovery Strategy (LNRS), which was published in October 2025, identifies priorities, target areas and measures for the recovery and enhancement of biodiversity. This Neighbourhood Plan has been designed to take account of the LNRS insofar as it relates to Lambourn Parish, and asks: Should this be elevated from a footnote to an additional paragraph in the supporting text?

Paragraph 6.7.18 of the supporting text includes a policy requirement for “all development proposals in the NP area should seek to deliver a biodiversity net gain of at least 10%, in line with the NPPF.” Policy requirements must not be included within supporting text. Paragraph 6.7.18 should be deleted.

This simply references the NPPF and forms part of the context to Policy L7.

Policy L7 Biodiversity

1. Development proposals should conserve, and enhance the local biodiversity of the area including the maintenance and creation of wildlife corridors within the NP area as shown on Figure 31 and contribute to strengthening ecological networks across the parish.

LPC supports the addition of the suggested amendment, but considers that the reference to the *maintenance and creation of wildlife corridors as shown in Fig 31* does focus the policy on what is distinctive about Lambourn Parish, and is in line with the Berkshire LNRS, so should not be deleted.

Development proposals will be expected to:

2. a) Retain, protect and where practicable enhance ecological networks and New wildlife corridors shown on Figure 31 are to be encouraged and developers within biodiversity opportunity areas will be expected to contribute to the enhancement of such areas.

LPC considers these amendments weaken the policy.

3. b) Maintain and strengthen habitat connectivity within the parish and with adjoining ecological networks Existing wildlife corridors in adjacent parishes should be identified and where possible connected into the NP area as appropriate.

LPC supports these proposed amendments

4. ~~Applicants should provide evidence of the means by which a biodiversity net gain can be achieved through enhancement measures as part of their planning applications.~~

5. ~~Proposals should avoid the loss of ancient and veteran trees and those of amenity value, in addition to native vegetation in accordance with Policy L3 and also be accompanied by surveys which assess the impact of the development on biodiversity.~~

LPC considers that the removal of criteria 4 and 5 weaken the Policy and should not be removed.

6. c) Particular attention should be given to Protect and enhance locally characteristic habitats, including:
lowland calcareous grassland;

traditional orchards;

chalk stream habitats associated with the River Lambourn;

hedgerow and woodland networks

~~restrict the impact on local and neighbouring Sites of Special Scientific Interest (SSSI), including:~~

~~i. ——— River Lambourn SAC / SSSI.; ii. Parkfarm Down SSSI.; iii. Seven Barrows SSSI.; iv. Croker's Hole SSSI.; v. Fognam Chalk Quarry SSSI.; vi. White Shute SSSI. vii. Cleeve Hill SSSI. viii. Westfield Farm Chalk Bank.~~

~~7. This is in addition to Ancient Woodland – the largest of which being Great Park Wood, Whitehill Wood and Cleeve Wood/Lords Wood Cuckoo Copse~~

LPC considers that the suggested changes to criteria 6 and 7 weaken the Policy by removing references to distinctive features of the Parish.

Suggested Amendments to: Policy L8 Dark Night Skies

1. Development proposals should conserve, and where practicable, enhance the intrinsically relative tranquillity in relation to light pollution and dark night skies of the parish by avoiding or minimising light pollution, including skyglow, glare and light spill.

What are the criteria in this case for "practicable"? LPC suggests wording be amended as follows: Development proposals should conserve, and enhance the intrinsic tranquillity in relation to light pollution and dark night skies of the parish by avoiding or minimising light pollution, including skyglow, glare and light spill.

2. Development proposals should also demonstrate that they meet or exceed the Institute of Lighting Professionals guidance and other relevant standards or guidance (CIE 150:2017 Guide on the Limitation of the Effects of Obtrusive Light from Outdoor Lighting Installations) or any equivalent replacement/updated guidance for lighting within environmental zones.

3. Development proposals which include lighting should ensure that:

a) Adverse effects from the installed lighting ~~should be~~ is avoided, or where this is not achievable, minimised and appropriately mitigated, including through measures such as the use of ~~b) If it is demonstrated that the above is not achievable, then adverse impacts are appropriately mitigated e.g. activated by sensors, and turned off by timers~~ or other control systems;

LPC considers these changes weaken the Policy. Keep (a) as written in Policy. (b) to read: If it is demonstrated that the above is not achievable, then adverse impacts are appropriately mitigated, including through measures such as the use of sensors, timers or other control systems

~~cb) The measured and observed sky quality in the surrounding area is not reduced;~~

~~dc) Lighting is not unnecessarily visible in nearby designated areas and key habitats;~~

~~ed) The visibility of lighting from the surrounding landscape is avoided;~~

~~fe) Building designs should avoid large areas of glazing which would result in light spillage into rural and unlit areas;~~

~~g) Glazing should be screened at night to avoid light spillage into rural and unlit areas where possible;~~

This criterion was intended to apply to larger business /industrial premises, where the potential light spill is larger and more easily enforced. LPC would like to retain this criterion in some form.

h) Lighting associated with Equestrian-related development, including stabling and outdoor arenas, is kept to the minimum necessary and is designed to avoid unnecessary illumination of the surrounding countryside, including through measures such as ~~incorporates downward-directed, low-intensity lighting and avoids extended or overnight use unless it can be clearly justified and mitigated;~~

LPC agrees to the amendment but would like to KEEP the reference to overnight lighting.

Experience has shown that lighting is often left on when it is unnecessary or could be mitigated.

~~I f) Development in and around Membury, including development associated with the near Membury Services or and the Membury Industrial Area, should be designed to limit cumulative light pollution, taking into account existing baseline levels and ensuring no further degradation of dark sky.~~

LPC accepts the addition to this criterion but the deleted sentence should be kept. Baseline levels need to be established at Membury and further degradation of the dark night sky limited. A local Tawny owl population has been lost this year due to additional overnight lighting on a recent development.

Suggested Amendments to Policy L9 Flooding and Drainage

Supporting text

For clarity, the following modification is suggested to paragraph 7.1.1: ~~While Local Plan Review Policy SP6 focuses on water management and the NPPF guides development to areas at the lowest flood risk, the following policy aims to identify and manage flood risk from all sources (i.e. fluvial, surface water, sewer and groundwater), in line with the evidence presented in the West Berkshire Council Strategic Flood Risk Assessment (SFRA) [2022 Update].~~ Policy L9 supplements Local Plan Review policy SP6 by providing locally specific guidance for Lambourn Parish, informed by the Strategic Flood Risk Assessment and local evidence on flooding from all sources (fluvial, surface water, sewer and groundwater).

LPC is concerned that, by removing the original wording, context for the policy is lost.

The strategic policies of the development plan require the consideration of the risk of flooding from all sources, and this includes surface water flooding. This echoes the requirements of the NPPF. It seems unnecessary to state that those proposing new development may not be aware of surface water flooding.

This comment was made at the pre-Submission (Regulation 14) stage. The Plan was not amended for the Submission version. Amendments were not made because LPC sees on a regular basis that there IS a lack of awareness about the causes of surface water flooding in the Parish. There is great local concern that, despite existing policies, flooding and drainage remain problems in the Parish.

Policy L9: Flooding and Drainage

1. Development proposals must ~~should~~ demonstrate that they will not increase flood risk on site or elsewhere, having regard to locally identified flood risk areas shown in Figure 33 and listed in paragraph 7.1.3 of the supporting text, how they will manage surface water and minimise the risk of localised flooding, particularly where natural surfaces or topsoil are to be removed. Proposals should refer to the requirements of Policy S6 of the LPR regarding Flood Risk Assessments and ensure that flood risk, both on-site and downstream, is appropriately addressed. 2. Where relevant, consideration should be given to historic surface water flooding records, high groundwater levels, and known sewer ~~sewer~~ flooding capacity constraints, as well as to areas with known drainage issues. Proposals should identify areas susceptible to flooding from all sources (i.e. fluvial, surface water, sewer and groundwater), requiring detailed submissions with planning applications.

LPC supports this proposed amendment as the inclusion of “must” strengthens the policy, but concern has been expressed at the removal of the specific reference to the removal of natural surfaces and topsoil, and about the use of flood records. Whilst historic flood records are useful, more recent records are not necessarily up-to-date, especially given the impact of recent climate change. Would it be appropriate to retain “Proposals should identify areas susceptible to flooding from all sources (i.e. fluvial, surface water, sewer and groundwater)”?

42. Sustainable Drainage Systems (SuDS) must be designed in accordance with the adopted ~~In order to sustainably manage flood risk on site and to ensure flood risk is not increased elsewhere, development will be required to incorporate a SuDS scheme which follows the drainage hierarchy, should be informed by The West Berkshire Council SuDS Supplementary Planning Document (SPD) or any successor document~~ and The Non-Statutory Technical Standards for Sustainable Drainage Systems. SuDS schemes should respond to local chalk geology and groundwater conditions and, where feasible, be designed to contribute to towards the landscaping landscape enhancement, and biodiversity of the development site, in addition to supporting appropriate use of the river and

watercourse improvements.

LPC agrees with these proposed amendments except for the removal of the reference to biodiversity. This should be retained. LPC is also concerned that there is no indication of the criteria for “feasible” landscape enhancement and watercourse improvements, bearing in mind the sensitivity of the local river catchment areas.

53. Development proposals will be supported where it is demonstrated that surface water run-off will not adversely affect neighbouring properties, watercourses, drainage infrastructure or sewer systems. Site-specific drainage strategies should incorporate SuDS and other appropriate measures to ensure no net increase in flood risk and to support the natural function of the River Lambourn and its catchment.

LPC supports this proposed amendment, but would like the reference to supporting the natural function of the River Lambourn and its catchment to be retained. Perhaps: “...systems and will support the natural function of the River Lambourn and its catchment.” The reference to “watercourses” is not specifically local.

64. ~~Schemes will be detailed within a site specific flood risk assessment and designed to current policy and best practice guidance, including taking account of climate change, to manage rainfall run-off rates and volumes to existing predevelopment rates and mimic the natural drainage regime of the site.~~ Where Flood Risk Assessments are required, they should demonstrate how local groundwater conditions, climate change allowances and cumulative impacts on drainage and sewer infrastructure have been assessed and addressed.

7. ~~Where possible SuDS schemes should be designed to contribute towards the landscaping and biodiversity of the development site, in addition to supporting appropriate use of the river. Applicants should also evaluate the soil and geological conditions to ensure that a SuDS can be effectively implemented.~~

8. ~~All proposals should identify mitigation measures and their maintenance e.g. permeable surfaces in perpetuity or suitable drains to be used and kept clean and drainage gullies/grids to be kept clear. Outstanding works needed along rivers to mitigate flooding risks and improve water management should also be considered.~~

9. ~~Development proposals will be supported where it is demonstrated that surface water drainage will not add to the existing site runoff or cause any adverse impact to neighbouring properties and surrounding environment. More specifically, development proposals will only be supported if they can achieve Nutrient Neutrality regarding the River Lambourn.~~

LPC is concerned that these amendments weaken policy L9. Parishioners are expecting strong policy on this major issue, wanting applicants to demonstrate they have understood the local situation and are prepared to frame practical responses.

Suggested Amendments to: Policy L16 Economy

Supporting text

- *WBC comment:* Change not made. The following modification is required to paragraph 10.2.7:
'Lambourn Parish contains 2 Protected Employment Areas (or Designated Employment Areas (DEAs) as they are referred to in the LPR),. DEAs are specific locations that are designated in the strategic policies of the development plan for business uses / development to promote sustainable economic growth. These areas host a diverse range of businesses from large multi-national companies to small and medium sized enterprises, all of which contribute to a strong and resilient local economy. Such areas contribute significantly to the supply of employment land across the district, and provide further opportunities for regeneration and intensification of use.'
LPC agrees, but given the fragmented nature of the two Designated Employment Areas, all the sites should be named/referred to on the maps. The Submitted Plan uses the maps (Figs. 47 and 47.1) which were supplied by WBC, and which correspond to those on their website.
- *WBC comment:* These paragraphs (10.2.8, 10.2.9, 10.2.11, and 10.2.12, pg 87) include mention of unauthorised development at the Membury Industrial Estate. Whilst there have been complaints, it does not appear that any have progressed to enforcement action.
Complaints have not resulted in enforcement action being taken. The reasons given for this suggest they have not been seen as a priority. There is large scale public interest in seeing planning decisions enforced and much disillusionment amongst Parishioners when complaints are not followed up.

Policy L16 Economy

Proposals for new or expanded Employment and rural industry development proposals (use classes B2 and E(g)) will be encouraged-supported within Designated Employment Areas, existing suitably located employment sites, and within the settlement boundary of Lambourn, or where they help to diversify the rural economy where the following criteria are met, subject to ensuring that they are in compliance with the Parish Design Code and:

i. ~~Are appropriate to the local economy and sustainably located such that they are accessible by non-car modes;~~

The removal of reference to sustainability substantially weakens the policy. The DEA areas in particular are poorly served by public transport (A point noted by WBC Highways in planning applications) and access via the B4000/Ermin Street and Ramsbury Road for walkers or cyclists is dangerous, given the lack of footpaths and the amount of heavy traffic. Although Upper Lambourn, Lambourn and Eastbury are better served by public transport, LPC considers this part of the Policy should be retained

ii. Prevent significant harm to identified heritage and the local biodiversity assets;

iii. Accord with the Lambourn design Code (Appendix G) and take ~~Are screened with appropriate native landscaping and opportunities are taken to enhance the wider local landscape as appropriate (see LDC)~~

LPC supports the proposed amendment

iv ~~iii~~ Are compatible with surrounding uses and ~~sited in a location where they~~ do not cause a nuisance with regard to adverse impact upon neighbouring uses, particularly with regard to noise, air quality, lighting, vibration, smell or visual impact (including important views);

The addition of air quality, lighting and vibration is supported, but it is not clear why “compatible with surrounding uses” has been inserted. This could, for example, lead to the lighting levels at Membury Services being duplicated by a neighbouring site and thus increasing light pollution in the National Landscape. Could this criterion begin: “Do not cause etc.”? A reference to the Design Code (Appendix G) would also help clarify the objective of the Policy, which is that development should seek to protect and, wherever reasonably possible, enhance the environmental quality and wellbeing of the neighbourhood

v ~~iv.~~ ~~Do not lead to significant traffic generation~~ Does not result in an unacceptable impact upon on highway safety, either on its own or cumulatively;

These amendments alter the meaning of the criterion. Traffic generation is not the same issue as highway safety. The impact of additional traffic generation is not only felt within the Parish (eg the increasing numbers of HGVs using Lambourn High Street) but also by neighbouring Parishes. The reference to cumulative impact is noted and appreciated.

vi ~~v.~~ Do not exacerbate issues at currently constrained junctions (see Figure 50);

vii ~~vi.~~ ~~— Demonstrate that traffic generation would not exceed the highway network capacity and provide ample parking to prevent exacerbating traffic problems within Lambourn High Street, Ramsbury Road and other identified problem areas as shown on Figure 49~~ Do not result in adverse impacts upon the local road network.;

Concerns were raised about the lack of parking in Lambourn throughout all the local consultations. The recent introduction of parking charges in the High Street car park has further exacerbated the issue. To eliminate reference to parking issues would be to deny the expressed strong wishes of the community and weaken both the policy and public support for the Plan. The suggested alternative is weak and lacks any specific references to problem areas and to highway capacity.

viii ~~vii~~ Does not lead to unacceptable impacts on lead to air quality problems (where existing air quality levels are high, or where development has the potential to give rise to significant air quality effects, proposals should be accompanied by an Air Quality Assessment);

ix ~~ix.~~ ~~— Achieve Nutrient Neutrality to mitigate the impact of runoff on local water systems, ensuring that soil health is preserved while minimising environmental harm. Mitigation required will need to be operational and in place prior to any nutrient pollution being discharged.~~

Policy DM6 in LPR does say that development proposals will be required to demonstrate nutrient neutrality, and proposals should support improving the status and overall health of the River Lambourn. However, criterion ix considers soil health and other environmental harm and makes clear that mitigation should be in place before any nutrient pollution is discharged. This is intended to clarify the extent of the detail required in any proposal.

Suggested Amendments to: Policy L17 Racehorse Training Industry

‘1. Proposals regarding the horseracing industry will be supported where development helps strengthen the rural economy and conserves the quality of the environment and the local character and satisfies the following criteria:

LPC supports these amendments.

a) ~~To~~ Supports the racehorse industry and allows sustainable and appropriate growth including associated businesses in conjunction with the findings of the Landscape Character Appraisal (see Appendix F)

LPC supports these amendments.

b) ~~———— To protect the racehorse industry from development which is incompatible with existing uses such as those which are noise generating, would increase pollutants to unacceptable levels, or would reduce access (all modes), both physically to a site or to associated facilities.~~

Paragraph 200 of the NPPF does deal with this, as indicated previously by the Minerals and Waste team in their comments on criterion b, but this is a matter of horse welfare as well as planning. By retaining this criterion the point that access to the gallops and other facilities could be affected by neighbouring development is reinforced, and including a specific local example of how national policy affects the Parish.

With regard to the use of "incompatible", which is "open to the interpretation of the applicant and the decision maker and would be difficult to implement". LPC suggests rewording the criterion to say: To protect the racehorse industry, development must be compatible with existing uses and not generate noise, increase pollutants above acceptable levels, or reduce access (all modes), both physically to a site or to associated facilities.

c) Existing RTI sites and facilities should be retained unless clear evidence demonstrates they are no longer viable. In assessing viability, consideration should be given to the availability of alternative private and public facilities (see as shown in Figures 46 and 47 and Appendix R) to ensure continued access for the community.;

LPC supports these amendments.

d) ~~In the instance~~ Where existing sites and facilities are proven to be no longer viable sites currently dedicated to racing or supporting the Racing Related Industries (RRI) are presumed to continue serving these purposes. Proposals for repurposing these sites away from RTI-linked uses ~~will be rejected~~ not be supported

LPC would prefer the original wording: "will be rejected", as "not be supported" may weaken the Policy.

f) To promote ~~good~~ high-quality design in ~~equestrian-related buildings~~ development, including ~~housing~~ residential accommodation, proposals ~~should~~ must be designed in accordance with the Design Code (see Appendix G)

LPC supports these suggested amendments, which strengthen the Policy.

Housing

. As one of the main challenges of sustaining the horseracing industry, high quality housing for RTI staff will be supported where proposals comply with the following criteria:

a) Contributes towards a balance of hostels, flats, houses and retirement accommodation that serves the diverse needs of RTI staff.

b) Support^s the creation of hostels on yard sites.

3. Where planning permission is required for the provision of accommodation for racehorse industry workers, in addition to complying with other relevant policies of the Development Plan

a) the need for it must be demonstrated as being essential to the current or future operation of the business to which it relates; and

b) the accommodation must be secured via a legal obligation to the business concerned for the purposes of staff accommodation.

LPC supports the suggested amendments to the above criteria in the Policy: Housing 2. (a), (b); 3.

LPC would like to comment on a further point, which may be of relevance to both Policy L17 and Policy L16. A previous comment from the Minerals and Waste team on Objective 2 of Vision and Objectives (pg 19) states:

Commercial development at Membury is not going to, or need to, support the needs of the racing industry.

MC Equine Surfaces (formerly Martin Collins Enterprises), based in the DEA, does a considerable amount of work for racing establishments within the Parish. Technical advances, such as the Pyreg waste disposal system, mean that businesses which support the RTI might be located appropriately in the DEA. These are just two examples which illustrate how commercial development in the DEA already does, and could in future, support the needs of the RTI.

Suggested Amendments to: Policy L18 Accessibility, Road Safety and Sustainable Transport

g) As Where appropriate to their scale, nature and location of development, mitigation measures to improve road safety should be designed ~~so as not to~~ to avoid the ~~urbanise~~ urbanisation of the rural landscape, ~~and should not increase~~ minimise noise impacts, and avoid ~~nor have an adverse impact~~ effects on pedestrians, cyclists ~~or~~ and horse-riding users of the route (see The Lambourn Parish Design Code in Appendix G).

LPC supports these proposed amendments