

Report on the Lambourn Neighbourhood Plan [2025] to 2041

An Examination undertaken for West Berkshire Council with the support of the Lambourn Parish Council on the December 2025 submission version of the Plan.

Independent Examiner: Andrew Mead BSc(Hons) MRTPI MIQ

Date of Report: 8 October 2026

Intelligent Plans and Examinations (IPE) Ltd, Office 10, 5 Argyle Street, Bath BA2 4BA

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

Contents

Main Findings - Executive Summary	4
1. Introduction and Background	4
Lambourn Neighbourhood Plan [2025] to 2041.....	4
The Independent Examiner	5
The Scope of the Examination	5
The Basic Conditions	6
2. Approach to the Examination.....	7
Planning Policy Context	7
Submitted Documents	7
Site Visit.....	8
Written Representations with or without Public Hearing	8
Modifications	8
3. Procedural Compliance and Human Rights.....	8
Qualifying Body and Neighbourhood Plan Area.....	8
Plan Period	9
Neighbourhood Plan Preparation and Consultation	9
Development and Use of Land	9
Excluded Development	9
Local Nature Recovery Strategy	9
Climate Change	10
Human Rights	10
4. Compliance with the Basic Conditions	10
Assimilated Obligations	10
Main Issues.....	11
Vision and Objectives	12
Policy L1 – Landscape Character.....	12
Policy L2 – Development within the North Wessex Downs	12
Policy L3 – Green and Blue Infrastructure, Landscaping and Planting.....	12
Policy L4 – Local Green Spaces.....	13
Policy L5 – Important Views	13
Policy L6 – River Lambourn.....	13
Policy L7 – Biodiversity.....	14
Policy L8 – Dark Night Skies.....	14
Policy L9 – Flooding and Drainage.....	14
Policy L10 – Non Designated Heritage Assets	15

Policy L11 – Character and Design	15
Policy L12 – Sustainable Construction, Resources and Climate Change	15
Policy L13 – Housing Development.....	16
Policy L14 – Site Specific Housing Allocations	16
Policy L15 – Community Facilities	17
Policy L16 – Economy.....	17
Policy L17 – Racehorse Training Industry.....	18
Policy L18 – Accessibility, Road Safety and Sustainable Transport.....	18
Policy L19 – Community Infrastructure.....	19
Alterations to the Text.....	19
Community Aspirations.....	19
5. Conclusions.....	19
Summary	19
The Referendum and its Area	20
Final comments	20
Appendix: Modifications.....	21

Main Findings - Executive Summary

From my examination of the Lambourn Neighbourhood Plan (the Plan/the LNP) and its supporting documentation including the representations made, I have concluded that subject to the policy modifications set out in this report, the Plan meets the Basic Conditions.

I have also concluded that:

- The Plan has been prepared and submitted for examination by a qualifying body – the Lambourn Parish Council;
- The Plan has been prepared for an area properly designated as shown on Figure 1 on page 7 of the Plan;
- The Plan specifies the period during which it is to take effect: [2025] to 2041¹; and
- The policies relate to the development and use of land for a designated neighbourhood area.

I recommend that the Plan, once modified, proceeds to referendum on the basis that it has met all the relevant legal requirements.

I have considered whether the referendum area should extend beyond the designated area to which the Plan relates and have concluded that it should not.

1. Introduction and Background

Lambourn Neighbourhood Plan [2025] to 2041

- 1.1 The thriving village of Lambourn lies in the valley of the River Lambourn within a rural open downland setting. Lambourn is the second largest centre for horse racing facilities in the UK, after Newmarket. Consequently, a large number of young adults work in the horse racing yards and associated services. Lambourn occupies a relatively isolated position with Swindon and Newbury about 22km and 29km to the north west and south east respectively; Hungerford about 15km to the south; with Oxford some 45km – 60km away, depending on the route chosen. Lambourn Parish is entirely within the North Wessex Downs National Landscape. The M4 passes east to west through the southern part of the Parish. The population of the Parish in 2021 was about 4220.²
- 1.2 The preparation of the Neighbourhood Plan first began in 2018. The Plan was submitted to West Berkshire Council (WBC) in February 2026 and represents several years of work by the Parish Council and the Neighbourhood Plan Steering Group.

¹ As recommended to be modified. See paragraph 3.3 below.

² Census 2021.

The Independent Examiner

- 1.3 As the Plan has now reached the examination stage, I have been appointed as the examiner of the Lambourn Neighbourhood Plan by WBC, with the agreement of the Lambourn Parish Council (LPC).
- 1.4 I am a chartered town planner and former government Planning Inspector, with many years' experience in planning and with extensive experience of examining neighbourhood plans. I am an independent examiner, and do not have an interest in any of the land that may be affected by the draft Plan.

The Scope of the Examination

- 1.5 As the independent examiner I am required to produce this report and recommend either:
- (a) that the neighbourhood plan is submitted to a referendum without changes; or
 - (b) that modifications are made and that the modified neighbourhood plan is submitted to a referendum; or
 - (c) that the neighbourhood plan does not proceed to a referendum on the basis that it does not meet the necessary legal requirements.
- 1.6 The scope of the examination is set out in Paragraph 8(1) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) ('the 1990 Act'). The examiner must consider:
- Whether the plan meets the Basic Conditions.
 - Whether the plan complies with provisions under s.38A and s.38B of the Planning and Compulsory Purchase Act 2004 (as amended) ('the 2004 Act'). These are:
 - it has been prepared and submitted for examination by a qualifying body, for an area that has been properly designated by the local planning authority;
 - it sets out policies in relation to the development and use of land and does not go beyond the scope of what may be included in a draft plan³;
 - it specifies the period during which it has effect;
 - it is the only neighbourhood plan for the area and does not relate to land outside the designated neighbourhood area;
 - it does not include provisions and policies for 'excluded development';

³ See s.38B(A1) and s.38B(2C)(a) of the 2004 Act.

- so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, it is designed to secure that the development and use of land in the neighbourhood area contribute to the mitigation of, and adaptation to, climate change⁴; and
 - so far as the qualifying body considers appropriate, and having regard to the subject matter of the plan, it takes account of any local nature recovery strategy, under section 104 of the Environment Act 2021, that relates to all or part of the neighbourhood area.⁵
- Whether the referendum boundary should be extended beyond the designated area, should the plan proceed to referendum.
 - Such matters as prescribed in the Neighbourhood Planning (General) Regulations 2012 (as amended)('the 2012 Regulations').
- 1.7 I have considered only matters that fall within Paragraph 8(1) of Schedule 4B to the 1990 Act, with one exception. That is the requirement that the Plan is compatible with the Human Rights Convention.

The Basic Conditions

- 1.8 The 'Basic Conditions' are set out in Paragraph 8(2) of Schedule 4B to the 1990 Act. In order to meet the Basic Conditions, the neighbourhood plan must:
- Have regard to national policies and advice contained in guidance issued by the Secretary of State;
 - Contribute to the achievement of sustainable development;
 - not result in the development plan for the area of the authority proposing that less housing is provided by means of development taking place in that area than if the neighbourhood development plan were not to be made⁶;

⁴ This additional requirement was commenced on 25 March 2026 by virtue of *The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026*, which brought into force section 98 of the Levelling-up and Regeneration Act 2023.

⁵ See footnote above.

⁶ This Basic Condition applies from 25 March 2026 by virtue of *The Levelling-up and Regeneration Act 2023 (Commencement No. 11 and Saving and Transitional Provisions) Regulations 2026*, which brought into force section 99 of the Levelling-up and Regeneration Act 2023. This replaces the former Basic Condition which required a neighbourhood plan to be in general conformity with the strategic policies of the development plan for the area.

- be compatible with, and not breach, assimilated obligations⁷; and
- Meet prescribed conditions and comply with prescribed matters.

1.9 Regulation 32 of the 2012 Regulations prescribes a further Basic Condition for a neighbourhood plan. This requires that the making of the Neighbourhood Development Plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.⁸

2. Approach to the Examination

Planning Policy Context

- 2.1 The Development Plan for this part of West Berkshire Council, not including documents relating to excluded minerals and waste development, is the West Berkshire Local Plan Review (LPR) 2023 - 2041, adopted in 2025.
- 2.2 The planning policy for England is set out principally in the National Planning Policy Framework (NPPF). The Planning Practice Guidance (PPG) offers guidance on how this policy should be implemented. A revised NPPF was published in December 2024 and a new NPPF was published in August 2026. However, the new version does not apply for the purposes of this examination.⁹ Unless otherwise stated, all references in the report are to the December 2024 NPPF and the accompanying PPG.

Submitted Documents

- 2.3 I have considered all policy, guidance and other reference documents I consider relevant to the examination, including:
- the draft Lambourn Neighbourhood Plan [2025] to 2041 (December 2025)¹⁰;
 - Figure 1 on page 7 of the Plan which identifies the area to which the proposed Neighbourhood Development Plan relates;
 - the Consultation Statement (June 2026);
 - the Basic Conditions Statement (January 2026; Addendum update May 2026¹¹);

⁷ See: The Retained EU Law (Revocation and Reform) Act 2023 (Consequential Amendment) Regulations 2023, which replaced the previous reference to 'EU' obligations.

⁸ This revised Basic Condition came into force on 28 December 2018 through the Conservation of Habitats and Species and Planning (Various Amendments) (England and Wales) Regulations 2018.

⁹ See the transitional arrangements provided by Annex A, Paragraph 6 of the August 2026 NPPF: [National Planning Policy Framework - GOV.UK](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/National_Planning_Policy_Framework_-_August_2026.pdf)

¹⁰ Appendices A-S were also supplied and can be viewed at:

<https://westberks.gov.uk/lambourn-np-reg-16-consultation>

- the Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) Screening Report (July 2023);
- the SEA Report (November 2024);
- The HRA Appropriate Assessment (March 2026);
- all the representations that have been made in accordance with the Regulation 16 consultation; and
- the responses dated 6 August from WBC and dated 10 August from LPC to my letter of 27 July 2026.¹²

Site Visit

- 2.4 I made an unaccompanied site visit to the Neighbourhood Plan Area on 21 July 2026 to familiarise myself with it, and visit relevant sites and areas referenced in the Plan and evidential documents.

Written Representations with or without Public Hearing

- 2.5 This examination has been dealt with by written representations. Notwithstanding the request for a hearing, I considered a hearing session to be unnecessary as the consultation responses clearly articulated the objections to the Plan and presented arguments for and against the Plan's suitability to proceed to a referendum.

Modifications

- 2.6 Where necessary, I have recommended modifications to the Plan (**PMs**) in this report in order that it meets the Basic Conditions and other legal requirements. For ease of reference, I have listed these modifications separately in the Appendix.

3. Procedural Compliance and Human Rights

Qualifying Body and Neighbourhood Plan Area

- 3.1 The Lambourn Neighbourhood Plan has been prepared and submitted for examination by the Lambourn Parish Council, which is the qualifying body for an area that was designated by West Berkshire Council on 7 December 2018.
- 3.2 It is the only Neighbourhood Plan for the Lambourn Parish and does not relate to land outside the designated Neighbourhood Plan Area.

¹¹ The Addendum update was to address the revised legal compliance and Basic Conditions changes that came into force on 25 March 2026 (see paragraphs 1.6 – 1.8 above with the accompanying footnotes).

¹² View at: <https://www.westberks.gov.uk/lambournnp> Note: Further reference documents which Lambourn Parish Council have used to inform the submission version of the NDP can be also be viewed via the link.

Plan Period

- 3.3 The Plan specifies the period during which it is to take effect, which is from 2025 to 2041, but the 2025 start date is only evident from the first paragraph of the Foreword of the Plan. Therefore, I recommend that the front cover of the Plan clearly states the period as 2025 – 2041. **(PM1)**

Neighbourhood Plan Preparation and Consultation

- 3.4 Details of the preparation of and the consultation on the Plan are contained in the Consultation Statement (CS) submitted with the Plan. Work commenced in 2018. A Steering Group was formed and a series of pop-up exhibitions were held culminating in a decision to proceed with the Neighbourhood Plan. Table 1 of the CS (pages 39 – 41) comprehensively lists the many community engagement events leading up to and then including the statutory pre-submission Regulation 14 consultation period. The Plan was submitted to WBC on 16 February 2026.
- 3.5 The Regulation 14 consultation took place between 6 September 2024 and 18 October 2024. Notification emails were sent to over 5,000 people on the WBC Planning Policy database. Drop-in sessions were held at Woodlands St Mary, Eastbury, and Upper Lambourn and a public presentation was made to the Lambourn Parish Council. A full list of statutory consultees is at Table 2 of the CS (pages 42 – 45). Table 3 (page 46 onwards) lists the comments from consultees and members of the public, the responses from the Neighbourhood Plan Steering Group and any consequent changes to the Plan.
- 3.6 Consultation under Regulation 16 took place between 18 May 2026 and 30 June 2026. 16 responses were received, including one from WBC. I confirm that the legal requirements have been met by the consultation process. In addition, there has been regard to the advice in the PPG on plan preparation and engagement.

Development and Use of Land

- 3.7 The Plan sets out policies in relation to the development and use of land in accordance with s.38A of the 2004 Act and does not exceed the appropriate scope of a neighbourhood plan.¹³

Excluded Development

- 3.8 The Plan does not include provisions and policies for 'excluded development'.¹⁴

Local Nature Recovery Strategy

¹³ See s.38B(A1) and s.38B(2C)(a) of the 2004 Act.

¹⁴ The meaning of 'excluded development' is set out in s.61K of the 1990 Act.

- 3.9 The Berkshire Local Nature Recovery Strategy (LNRS) was published in October 2025. It identifies priorities, target areas and measures for the recovery and enhancement of biodiversity. The Neighbourhood Plan has been designed to take account of the LNRS insofar as it relates to Lambourn Parish. In my assessment, including noting the contents of the helpful Addendum update to the Basic Conditions Statement (BCS) (May 2026), I consider that none of the Plan's policies are in direct conflict with the LNRS strategy.

Climate Change

- 3.10 I am satisfied that overall, the Plan policies do not conflict with the aims of securing development which contributes to the mitigation of, and adaptation to, climate change. This conclusion was also assisted by the Addendum update to the BCS (May 2026).

Human Rights

- 3.11 The BCS notes that the LNP Steering Group have sought to ensure that the Plan been prepared having regard to the fundamental rights and freedom guaranteed under the European Convention on Human Rights and that it complies with the Human Rights Act 1998. The LNP has been the subject of extensive consultation with local people who could be affected by its policies and their views have been taken into account in finalising the Plan. An Equalities Assessment has been carried out on the policies in the Plan to ensure that the implementation of the Plan would not lead to increased inequalities or discrimination in the Neighbourhood Plan Area (See BCS: Appendix 1). The LPC are satisfied that the Plan does not breach Human Rights (within the meaning of the Human Rights Act 1998) and, from my independent assessment, I see no reason to disagree.

4. Compliance with the Basic Conditions

Assimilated Obligations

- 4.1 WBC made an HRA Screening Determination on 10 July 2023, stating that the Lambourn Neighbourhood Plan has the potential for likely significant effects on the River Lambourn Special Area of Conservation (SAC) due to the impacts of the housing allocations in Policy L14 on the air quality, water quality and hydrological changes (including nutrient neutrality) in combination with other plans and project. These pathways and the policies were discussed within the subsequent Appropriate Assessment. The adopted LPR provides protective policies for European sites within Policy CS17: Biodiversity and Geodiversity and Policy CS16: Flooding and Water Management. The HRA of the LPR concluded that it would not cause likely significant effects on any European site, either alone or in combination with other plans and projects.

- 4.2 As the LNP is not allocating net new dwellings above the level of the LPR, it can be concluded that the LNP would not adversely impact European sites, either alone or in combination with other plans and projects. Policy L6 (River Lambourn) already includes nutrient neutrality as a development requirement as does LPR Policy DM6 c. Development proposals will only be supported if they can achieve nutrient neutrality regarding the River Lambourn. Therefore, it is not considered necessary to make further amendments to the Neighbourhood Plan, other than to recommend that the references to nitrogen are amended to phosphorus as per paragraph 5.7 of the HRA Appropriate Assessment of the Plan. With these changes made it is considered that the Neighbourhood Plan will contain a sufficient policy framework to ensure no adverse effect on integrity of European sites arises from the allocations in the plan. Having read the Strategic Environmental Assessment Report, the SEA and HRA Screening Report and the HRA Appropriate Assessment, I support these conclusions.¹⁵

Main Issues

- 4.3 Having considered whether the Plan complies with various procedural and legal requirements, it is now necessary to deal with whether it complies with the remaining Basic Conditions, particularly the regard it pays to national policy and guidance and the contribution it makes to the achievement of sustainable development. I test the Plan against the Basic Conditions by considering specific issues of compliance of all the Plan's policies.
- 4.4 As part of that assessment, I consider whether the policies are sufficiently clear and unambiguous, having regard to advice in the PPG. A neighbourhood plan policy should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence.¹⁶
- 4.5 Accordingly, having regard to the Lambourn Neighbourhood Plan, the consultation responses, other evidence and the site visit, I consider that the main issues in this examination are whether the draft Plan's policies: (i) have regard to national policy and guidance; (ii) do not result in the development plan for the area proposing less housing development than would have been the case if the plan were not to be made; and (iii) would contribute to the achievement of sustainable development.

¹⁵ Noting that Natural England did not respond to consultation on the SEA and HRA Screening Report but had no objections to the Plan at Regulation 16 and neither did Historic England: see responses dated 26 June 2026 and 30 June 2026 respectively. The Environment Agency did not respond to the Regulation 16 consultation.

¹⁶ PPG Reference ID: 41-041-20140306.

Vision and Objectives

- 4.6 The vision for the LNP is based on issues raised by the community during the initial stages of the consultation process. The succinct vision is described in paragraph 4.1.3 on page 18 of the Plan. The vision is then separated into eight detailed objectives listed on pages 19 and 20 of the Plan to help to achieve the vision. The objectives provide the context for the nineteen land-use based policies organised into six broad themes.

Policy L1 – Landscape Character

- 4.7 The policy aims to protect the landscape character of the area. WBC suggest various amendments to the three paragraphs of the policy to either strengthen or clarify it. LPC support the changes to Clauses 1 and 2 and most of those in Clause 3, other than c) and e), which I consider as follows: c) I agree with the inclusion of the phrase "*proportionate to the scale and location of development*" because they are important considerations in the National Landscape; e) I agree with the principle of the suggestion by WBC, because the landscaping requirement would apply throughout the Plan area (not just within the Designated Employment Areas (DEA)). It will still apply within the DEA. I have incorporated the changes into a recommended cumulative modification to the policy which is shown in its modified form in the Appendix. **(PM2)** The policy would then have regard to national guidance¹⁷ and meet the Basic Conditions.

Policy L2 – Development within the North Wessex Downs

- 4.8 Policy L2 considers development proposals within the North Wessex Downs National Landscape. In order to avoid repetition with the LPR and ensure clarity, WBC have made suggestions to revise the policy about which LPC have made comments. I agree with the WBC revisions for the reasons given by the Council and will recommend them as a modification to the policy. **(PM3)** The policy would then have regard to national guidance¹⁸ and meet the Basic Conditions.

Policy L3 – Green and Blue Infrastructure, Landscaping and Planting

- 4.9 Policy L3 aims to safeguard watercourses and water bodies, features that provide natural flood defences, and trees and woodland features. Subject to the replacement of "should" with "*must*" in the final sentence of Clause 2 b), the policy has regard to national guidance¹⁹ and meets the Basic Conditions. **(PM4)**

¹⁷ NPPF: paragraph 187.

¹⁸ NPPF: paragraph 189.

¹⁹ NPPF: paragraphs 187 and 192.

Policy L4 – Local Green Spaces

4.10 Policy L4 defines nineteen Local Green Spaces (LGS). LGS designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- c) local in character and is not an extensive tract of land.²⁰

LGS should also be capable of enduring beyond the end of the Plan period.²¹ I agree that the proposed LGS satisfy the national designation criteria.

4.11 Therefore, subject to the inclusion of a reference to Figures 19 – 23 in the policy, it has regard to national guidance²² and meets the Basic Conditions. **(PM5)**

Policy L5 – Important Views

4.12 Policy L5 identifies twenty-three important views within which development must not have a significantly adverse impact. The policy has regard to national guidance²³ and meets the Basic Conditions.

Policy L6 – River Lambourn

4.13 The River Lambourn is a rare and ecologically important chalk stream which Policy L6 seeks to protect. I agree with the WBC comment that Clause 1 is descriptive and should be removed to the supporting text. WBC also suggest revisions to items c), d), e) and f) and the deletion of l) which LPC support. Item m) aims to ensure that nutrient neutrality is achieved from the start of its operational phase. WBC suggested that nutrient neutrality should be from the occupation of the development. However, I agree with LPC and there may be a considerable delay between commencing the development and occupying it. Therefore, I shall recommend the use of the term "*commencement*". With these recommended modifications, Policy L6 would have regard to national guidance²⁴ and meet the Basic Conditions. **(PM6)**

²⁰ NPPF: paragraph 107.

²¹ NPPF: paragraph 106.

²² NPPF: paragraphs 106 – 108.

²³ NPPF: paragraph 187.

²⁴ NPPF: paragraphs 187 and 192.

Policy L7 – Biodiversity

- 4.14 Policy L7 aims to conserve and enhance the local diversity of the area, including the creation and maintenance of wildlife corridors. I shall recommend combining Clauses 1 and 2 in order to avoid repetition and also to include reference to the wildlife corridors identified in the Plan. Clauses 4, 6 and 7 are covered in the comprehensive LPR Policy SP11. Clause 5 is dealt with in LPR Policy DM15. Therefore, I shall recommend the above modifications and deletions. I shall also recommend the addition of a paragraph to the supporting text agreed with LPC to refer to the Berkshire LNRS. **(PM7)** The policy would then have regard to national guidance²⁵ and meet the Basic Conditions.

Policy L8 – Dark Night Skies

- 4.15 Policy L8 seeks to minimise light pollution and enhance the dark night skies in the area. The amendments to the policy suggested by WBC aim to avoid repetition and improve clarity. In Clause 1, LPC disagreed with the inclusion of “where practicable” and I recommend the use of “*where possible*” because it is not always reasonable to require enhancement as a “claw back” where lighting has been previously permitted.
- 4.16 I do not support the representation which distinguishes between on-plot and off-plot lighting and suggests consequent amendments.²⁶ Some on-plot lighting, even downward facing porch lights, may be extremely intrusive. I support the amendment suggested by WBC to Clause 3 a) which, in my view, does not weaken the policy. I agree with LPC that it would be desirable to avoid light spill in darkness and shall only recommend a slight modification to Clause 3 g). Similarly, I support the comments by LPC about Clause 3 h) relating to night-time use and shall recommend the retention of the final phrase in the modification.
- 4.17 In Clause 3 i), the need to take into account the existing baseline levels is more appropriately considered at the time of the submission of any planning application rather than when the Plan is made; and can then be part of the assessment of the application. “Ensuring no further degradation of dark sky” is a reason for the policy, not in itself a policy statement. Therefore, I agree with the suggestions by WBC. The recommended modifications to the policy are detailed in the Appendix. **(PM8)** The policy would then have regard to national guidance²⁷ and meet the Basic Conditions.

Policy L9 – Flooding and Drainage

- 4.18 Policy L9 considers flooding and drainage issues within the Plan area. In order to avoid repetition with LPR Policies SP6 and DM9, and also to

²⁵ NPPF: paragraph 192.

²⁶ Regulation 16 representation from Thakeham dated 30 June 2026.

²⁷ NPPF: paragraph 198 c).

minimise ambiguity, WBC has suggested amendments to the policy to which LPC have responded. My recommended modifications described in the Appendix are aimed at removing repetition; removing ambiguity; and also being realistic in relating the possible impact of a development on the immediate site or surrounding, rather than burdening proposed development with the need to remedy defects which are possibly not of its making. The need to support the natural function of the River Lambourn in Clause 5 is covered by the requirement to protect watercourses in the revised Policy L6. I also consider that the protection of the quality of the River Lambourn is not weakened by the deletion of Clauses 7, 8 or, more especially, 9. The policy also lists areas identified as particularly vulnerable to flooding in Clause 3 and it is suggested by WBC, and I agree that, this is moved to the supporting text at paragraph 7.1.3. With the recommended modifications, the policy would then have regard to national guidance²⁸ and meet the Basic Conditions. **(PM9)**

Policy L10 – Non Designated Heritage Assets

- 4.19 Policy L10 identifies two lists of non-designated heritage assets and describes policy requirements in three Clauses, the third of which (Clause 4) raises the issue of public benefits of the proposal. The public benefit of a proposal is not included as a consideration in the NPPF, paragraph 216. Therefore, to have regard to national guidance, I suggested a revision to the policy which both Councils supported: *"Where a proposal would result in harm to the significance of a non-designated heritage asset, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."* I shall recommend that suggestion as a modification to Clause 4 and still retain Clause 5. **(PM10)** The policy would then have regard to national guidance²⁹ and meet the Basic Conditions.

Policy L11 – Character and Design

- 4.20 Policy L11 deals with character and design in new development. WBC have indicated that there is an inconsistency in how the Lambourn Design Code is referred to which could be corrected by the use of *"must demonstrate"* as opposed to *"should demonstrate"* which I shall recommend for Clauses 1 and 2. **(PM11)** The policy would then have regard to national guidance³⁰ and meet the Basic Conditions.

Policy L12 – Sustainable Construction, Resources and Climate Change

- 4.21 Policy L12 considers sustainable construction, resources and climate change. WBC raise a similar issue for the same reasons as above about the use of *"should"*, whereas *"must"* is preferred and which I shall

²⁸ NPPF: paragraphs 170 - 182.

²⁹ NPPF: paragraph 216.

³⁰ NPPF: Section 12.

recommend. **(PM12)** The policy would then have regard to national guidance³¹ and meet the Basic Conditions.

Policy L13 – Housing Development

- 4.22 Policy L13 is a general housing policy, the first Clause of which duplicates part of Policy L11. It is therefore unnecessary and I shall recommend it should be deleted. I shall also recommend amendments to Clause 2 to have regard to national guidance regarding major development. **(PM13)** The policy would then have regard to national guidance³² and meet the Basic Conditions.

Policy L14 – Site Specific Housing Allocations

- 4.23 Policy L14 comprises three sites allocated for housing development in the Plan: Policy L14A – Land at Wantage Road for approximately 25 dwellings; Policy L14B – Former Royal British Legion Site, Big Lane for approximately 10 dwellings; and Policy L14C – Land at Collingridge Farm for approximately 10 dwellings (including the potential for conversion of Collingridge House). Land at Collingridge Farm is no longer available for general housing development³³ and therefore I shall recommend that Policy L14C should be deleted.
- 4.24 Paragraph 9.4.1 refers to the site selection process for the housing allocations which is described in Appendix P. WBC comment on details within the site selection process about the specific allocated sites and which should be taken into account. However, WBC also state that the site selection fails to cover the exceptional circumstances test in the NPPF (paragraph 190) for major development in National Landscapes. Therefore, I shall recommend that the site selection test is updated to consider how the allocations meet the requirements of paragraph 190 of the NPPF.
- 4.25 I shall recommend a revision to criterion ii in Policies L14A and L14B to clarify the reference to the Design Code. WBC suggest that Policy L14A should include a reference to the need for an archaeological evaluation as reflected in the site assessment and I shall recommend it. Policies L14A and L14B would then have regard to national guidance³⁴ and meet the Basic Conditions. **(PM14)**
- 4.26 A representation was received which seeks four modifications to the Plan which are focussed on allocations for residential development in the Plan area.³⁵ The first modification is the inclusion of a new policy on Disability

³¹ NPPF: paragraph 162.

³² NPPF: paragraphs 61 and 124.

³³ See Regulation 16 representation from RAW Planning on behalf of Injured Jockeys Fund.

³⁴ NPPF: paragraphs 61, 124 and 190.

³⁵ See representation from Professor Wes Armour, dated 20 June 2026.

and Equality Impact Assessment for Residential Development. The second modification is to strengthen the residential amenity policy by adding a criterion considering disability of existing residents. The third modification would require pre application engagement. The fourth modification considers Construction Environment Management Plans.

- 4.27 In my opinion, a new policy on Disability and Equality and Impact Assessment is unnecessary because it is already possible to assess such impacts through the administration of Policies DM3 and DM5 of the Local Plan Review in standard development management procedures should a planning application be received. The second modification is also already provided for in Policies DM3 and DM5. Furthermore, should full mitigation be required for an application which is on land already allocated in the LPR, there is the possibility that the allocated land might not provide sufficient housing numbers and result in the Plan failing the Basic Condition which ensures housing delivery in neighbourhood plans.
- 4.28 The targeted pre application engagement sought in the third modification is impracticable, but the overall aim is capable of being satisfied through standard development management procedures when planning applications are received and consequent representations made by members of the public. Similarly, a construction management plan, should the need arise, can be required on a case-by-case basis as part of the standard development management process. Therefore, I do not support any of the four modifications sought to the Plan.

Policy L15 – Community Facilities

- 4.29 Policy L15 identifies a list of community facilities, seeks to protect them, and supports measures to improve them. Subject to the replacement of “utility” in Clause 3 c) with “*operation, function*”, in order to ensure clarity, the policy has regard to national guidance³⁶ and meets the Basic Conditions. **(PM15)**

Policy L16 – Economy

- 4.30 Policy L16 supports employment and rural industry proposals. WBC suggested various amendments to the criteria within the policy in order to avoid repetition with the LPR and ensure clarity, which I support subject to the following comments. On the introductory phrase of the policy and criterion i I can understand the wish of LPC to retain the phrase “sustainably located”, but it is not always possible to have a footpath access alongside a road to a site. There may be insufficient width or hedgerows and trees might require removal. Similarly, a site within a well-lit, safe walking distance of habitation is not always possible. Therefore, I support the amendment to criterion i suggested by WBC.

³⁶ NPPF: paragraph 98.

- 4.31 So far as amendments to iv are concerned, I consider that the reference to the phrase “compatible with surrounding uses” is unnecessary when followed by the subsequent phrase in the policy. The same compatibility phrase is also used in LPR Policy DM5 b. Whilst the Design Code is already mentioned in criterion iii, this should be made clearer.
- 4.32 I agree with LPC that traffic generation and highway safety are not the same, but it is the impact on highway safety itself which is the constraining factor not the issue of additional traffic. Accordingly, I agree with the amendment to criterion v suggested by WBC.
- 4.33 I agree that the amendment suggested by WBC to criterion vii is more appropriate because it includes not just the places shown on Figure 49 but will include other unspecified locations elsewhere within the Plan area. I will also recommend the inclusion of a reference to car parking in Lambourn. The amendment to criterion viii suggested by WBC provides the necessary clarity and I shall recommend it.
- 4.34 So far as criterion ix is concerned, as accepted by LPC, LPR Policy DM6 says that development proposals will be required to demonstrate nutrient neutrality, and proposals should support improving the status and overall health of the River Lambourn. Therefore, I shall recommend the deletion of the first phrase of the criterion.
- 4.35 With the recommended modifications Policy L16 would have regard to national guidance³⁷ and meet the Basic Conditions. **(PM16)**

Policy L17 – Racehorse Training Industry (RTI)

- 4.36 Policy L17 supports the Racehorse Training Industry (RTI). Some of the suggested revisions by WBC to ensure the policy is clear have the support of LPC and I agree with them and shall recommend them as modifications.
- 4.37 The suggested revision to criterion b) by WBC is disputed by LPC and I agree with the Parish Council that there may be occasions where the specific needs of the RTI should be taken into account, whether it be horses, access to gallops or on land adjacent to gallops. Therefore, I shall recommend the amendment suggested by the LPC. In criterion d), I do not consider that the failure to support suggested by WBC weakens the policy. With the recommended modifications, Policy L17 would have regard to national guidance³⁸ and would meet the Basic Conditions. **(PM17)**

Policy L18 – Accessibility, Road Safety and Sustainable Transport

- 4.38 Policy L18 aims to ensure accessibility, road safety and sustainable transport. Some amendments are suggested to Clause 3 g) to ensure

³⁷ NPPF: paragraphs 86 – 89.

³⁸ NPPF: paragraphs 86 – 88.

clarity which LPC support, with which I agree and which I shall recommend as modifications. **(PM18)** The policy would then have regard to national guidance³⁹ and would meet the Basic Conditions.

Policy L19 – Community Infrastructure

- 4.39 Policy L19 describes provisions for younger people, older people and those with additional needs and the racing community. The policy has regard to national guidance⁴⁰ and meets the Basic Conditions.

Alterations to the Text

- 4.40 The acceptance of the modifications will require minor consequential amendments to be made to the explanation within the Plan in order to make it logical. Other amendments might also include minor contextual updates, correcting minor inaccuracies or typographical errors, cross referencing and any renumbering of paragraphs and policies. None of these alterations would affect the ability of the Plan to meet the Basic Conditions and could be undertaken as minor, non-material changes.⁴¹

Community Aspirations

- 4.41 Section 12 contains a long list of actions to be carried out by the Parish Council. These worthwhile projects are listed on pages 98 and 99. These are items which the community is seeking but cannot be delivered through planning policies, which are not considered as part of the examination and which will not form part of the statutory Development Plan. Nevertheless, they represent aspirations or actions which would benefit the community and demonstrate one of the valuable associated attributes of the neighbourhood planning process.⁴²

5. Conclusions

Summary

- 5.1 The Lambourn Neighbourhood Plan has been duly prepared in compliance with the procedural requirements. My examination has investigated whether the Plan meets the Basic Conditions and other legal requirements for neighbourhood plans. I have had regard to all the responses made following consultation on the Neighbourhood Plan, and the evidence documents submitted with it.
- 5.2 I have made recommendations to modify seventeen of the nineteen policies, many comprising focused amendments to provide the necessary

³⁹ NPPF: paragraph 109.

⁴⁰ NPPF: paragraph 96.

⁴¹ PPG Reference ID: 41-106-20190509.

⁴² PPG Reference ID: 41-004-20190509.

clarity, in sum ensuring the Plan meets the Basic Conditions and other legal requirements. I recommend that the Plan, once modified, proceeds to referendum.

The Referendum and its Area

- 5.3 I have considered whether or not the referendum area should be extended beyond the designated area to which the Plan relates. The Plan as modified has no policy or proposals which I consider significant enough to have an impact beyond the designated Neighbourhood Plan boundary and which would require the referendum to extend to areas beyond the Plan boundary. I recommend that the boundary for the purposes of any future referendum on the Plan should be the boundary of the designated Neighbourhood Plan Area.

Final comments

- 5.4 The Lambourn Parish Council, the Neighbourhood Plan Steering Group and other voluntary contributors are to be commended for producing a comprehensive and extremely well illustrated Plan. I enjoyed examining the Plan and visiting Lambourn and its very scenic surroundings . The Plan benefitted greatly from the detailed Regulation 16 comments from WBC and from the constructive and cooperative responses by WBC and LPC to answering my questions. Subject to the recommended modifications, the Neighbourhood Plan will make a positive contribution to the Development Plan for the area.

Andrew Mead

Examiner

Appendix: Modifications

Proposed Modification (PM)

PM1 – Front cover

State clearly the Plan period as: **"2025 – 2041"**

PM2 – Policy L1

Amend the policy to:

"1. Development proposals must demonstrate how they conserve or enhance the landscape character of the Parish and accord with the recommendations of the Lambourn Design Code (Appendix G).

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

3. It 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 wildlife sites as shown in Figures 29 and 30.

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

c) 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.

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

e) The provision of suitable landscaping incorporating appropriate layout, scale, design and landscaping (including screening and long-term management) to ensure that the development will not result in unacceptable harm to landscape character.

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

PM3 – Policy L2

Amend the policy to:

"Development proposals within the Parish must:

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 Code (Appendix G).

2. Retain, conserve and, where possible, enhance characteristic tree cover, woodland, hedgerows, and the sylvan setting which contributes to the visual containment of built form.

3. Be 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. 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.

PM4 – Policy L3

In the final sentence of Clause 2 b), replace "should" with ***"must"***.

PM5 – Policy L4

Amend the first sentence of the policy to: ***"The Neighbourhood Plan designates the following locations as Local Green Spaces, as illustrated in Figures 19 – 23: etc...."***.

PM6 – Policy L6

Delete Clause 1 and include in the supporting text.

Amend items c), d), e) and f) to:

"c) Proposals adjacent to the river will be supported where they do not increase flood risk on-site or elsewhere, having regard to Policy L9.

d) Proposals which include development alongside the river, or the change of use of land alongside the river, must demonstrate that there will be no adverse impact upon the riverbank or the riparian environment, including from future use or management

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

f) Development must, where appropriate and proportionate to its scale, improve access to and connectivity along the river corridor, including links to Public Rights of Way."

Delete item l).

Amend the final phrase in m) to: ***"... to ensure development is nutrient neutral from its commencement."***

PM7 – Policy L7

Amend the policy to:

"1. Development proposals should retain, protect and, where practicable, enhance biodiversity and contribute to strengthening ecological networks across the Parish, especially within the wildlife corridors shown in Figure 31. Development proposals will be expected to:

a) Maintain and strengthen habitat connectivity within the Parish and with adjoining ecological networks; and

b) Protect and enhance locally characteristic habitats, including: lowland calcareous grassland; traditional orchards; chalk stream habitats associated with the River Lambourn; hedgerow and woodland networks.

2. Development proposals should incorporate bird and bat boxes, etc..."

Add to the supporting text a new paragraph:

"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."

Delete Clauses 3 - 7.

PM8 – Policy L8

Amend the Clauses of the policy as follows:

"1. Development proposals should conserve and, where possible, enhance the intrinsically dark night skies of the Parish by avoiding

or minimising light pollution, including skyglow, glare and light spill."

[2. Unchanged]

"3. Development proposals which include lighting should ensure that:

a) Adverse effects from the installed lighting are avoided, or where this is not achievable, minimised and appropriately mitigated, including through measures such as the use of sensors or other control systems;"

[b) – f) unchanged]

"g) Where possible, new glazing should be screened at night to avoid light spillage into rural and unlit areas;

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 downward-directed, low intensity lighting and avoids extended or overnight use, unless it can be clearly justified and mitigated;

i) Development in and around Membury, including development associated with the Membury Services and the Membury Industrial Area, should be designed to limit cumulative light pollution."

PM9 – Policy L9

Amend the policy by substituting as follows:

"1. Development proposals must (a) 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, (b) show how they will manage surface water and minimise the risk of localised flooding, particularly where natural surfaces or topsoil are to be removed. (c) refer to the requirements of Policy SP6 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 flooding capacity constraints. Proposals should identify areas susceptible to flooding from all sources (i.e. fluvial, surface water, sewer and groundwater), requiring detailed submissions with planning applications."

3. Deleted. Move the list to amended paragraph 7.1.3.

"4. Sustainable Drainage Systems (SuDS) must be designed in accordance with the adopted 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, contribute to landscape, biodiversity and watercourse improvements.

5. Development proposals should incorporate SuDS, where appropriate, and will be supported where it is demonstrated that surface water run-off will not adversely affect neighbouring properties, watercourses, drainage infrastructure or sewer systems.

6. 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."

Delete Clauses 7, 8 and 9.

Amend paragraph 7.1.3 to: ***"As illustrated in Figures 33 and 34 below, several areas within the Parish are susceptible to surface water flooding, a potential concern that may not be readily apparent to those proposing new developments. The following areas have been identified as being particularly vulnerable to flooding: a) Junction at B4000 towards the High Street, etc"***.

PM10 – Policy L10

Amend Clause 4 to:

"Where a proposal would result in harm to the significance of a non-designated heritage asset, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

PM11 – Policy L11

Amend Clause 1 to: ***"Development proposals must demonstrate how they respond ...etc."***

Amend Clause 2 to: ***"As appropriate development proposals must demonstrate within their ... how they accord with each relevant matter set out in the Design Code (Appendix G). Including ... etc."***

PM12 – Policy L12

Amend the policy to: ***"All new development proposals must incorporate measures ... etc."***

Intelligent Plans and Examinations (IPE) Ltd, Office 10, 5 Argyle Street, Bath BA2 4BA

Registered in England and Wales. Company Reg. No. 10100118. VAT Reg. No. 237 7641 84

PM13 – Policy L13

Delete Clause 1.

Amend Clause 2 to:

"Development proposals of 10 or more dwellings (gross) should demonstrate how the proposed housing mix has regard to the current and future local housing needs identified in the Housing Need Assessment (Appendix O), or updated successor document."

PM14 – Policy L14

Update Appendix P: Site Specific Housing Allocations Selection to consider the exceptional circumstances required to justify major development in the National Landscape (NPPF, paragraph 190).

Delete Policy L14C from Policy L14 and Figure 45.

Amend criterion ii in Policies L14A and L14B to:

"Development of the site should have regard to the guidance set out in the Design Code (Appendix G)."

Add criterion to Policy L14A:

"vii Development will be informed by an archaeological desk-based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site".

PM15 – Policy L15

In Clause 3 c) replace "... utility ..." with " ... **operation, function** ...".

PM16 – Policy L16

Amend the first paragraph and criterion i) to:

"Proposals for new or expanded employment and rural industry development proposals (use classes B2 and E(g)) will be 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"

Amend criterion iii to:

"Accord with the Lambourn Design Code (Appendix G) and take opportunities to enhance the wider local landscape as appropriate."

Amend criterion iv to:

"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);"

Amend criterion v to:

"Do not result in an unacceptable impact upon highway safety, either on their own or cumulatively;"

Amend criterion vii to:

"Do not result in adverse impacts upon the local road network and particularly car parking in Lambourn;"

Amend criterion viii to:

"Do not lead to unacceptable impacts on air quality 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; and"

Amend criterion ix to:

"Ensure 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."

PM17 – Policy L17

Amend the first paragraph of Clause 1 and criteria a) and b) to:

"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:

a) 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)."

Amend criterion b) to:

"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."

Amend criterion c) to:

"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."

Amend criterion d) to:

"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 not be supported."

Amend criterion f) to:

"To promote high-quality design in equestrian-related development, including housing residential accommodation, proposals must be designed in accordance with the Design Code (Appendix G)."

Amend Clause 2 and criteria a) and b) to:

"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) Supports the creation of hostels on yard sites."

Amend the first paragraph of Clause 3 to:

"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: ...etc."

PM18 – Policy L18

Amend Clause 3. g) to

"Where appropriate to their scale, nature and location of development, mitigation measures to improve road safety should be designed to avoid the urbanisation of the rural landscape, minimise noise impacts, and avoid adverse effects on pedestrians, cyclists and horse-riding users of the route (see The Lambourn Parish Design Code in Appendix G)."