

Newbury Town Design Statement Refresh 2018

Consultation Responses and Recommended Actions.

Underlined text within the Recommended Action column is text which is suggested to be inserted, and text with strikethrough is suggested for deletion.

Consultee	Representation	WBDC Recommended Action (for Newbury Town Council)	Town Council Working Group Response / Recommendation
David Peacocke	<p>DP comments on the June 2017 draft of the Newbury Town Design Statement.</p> <p><u>Section 1 Introduction</u> P. 4 ("Scope"). Why has the Town Council chosen to identify itself directly with West Berkshire's policies for the town? Surely an element of distance and independence would be helpful? In this document, the town council should aim to speak as a voice for the town, rather than present a district view.</p> <p>Par 1 "This Town Design Statement (TDS) will inform <u>and interpret</u> existing West Berkshire District Council policies..." or "...will inform <u>and extend</u>..." would be better than "inform and support." And "...the guidance contained in this Design Statement <u>provides an interpretation</u>..." would be preferable to "provides an explanation..."</p>	<p>These comments are noted and some changes are proposed to the Design Statement.</p> <p>The Town Design Statement (TDS) is a community led document which is intended to influence the operation of the statutory planning system. It needs to comply with existing policies within the development plan, and where appropriate, will be used as a material consideration in the determination of planning applications.</p> <p>Agreed – wording in TDS can be amended - pg4, 1st paragraph to read: "This Town Design Statement (TDS) will inform and support <u>provide the detailed context for</u> existing West Berkshire District Council policies...' "...As a 'material consideration' the guidance contained in this Design Statement provides an explanation of West Berkshire Council's policy position and while it is not a statutory document it has been subject to public consultation."</p>	<p>Agreed</p> <p>Agreed</p>

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	<p><u>Section 2 Historical Development</u></p> <p>p. 6 The Oxford diocese is a relatively late creation, and Newbury was in the diocese of Salisbury for much of its existence. Newbury is better described as "...set between the <u>medieval</u> centres of Winchester and Oxford..."</p> <p>p. 6. In spite of its claims, St. Bartholomew's school was not founded in 1466. It evolved from a chantry founded in 1466, but the first references to the school itself are from the 16th century, during the reign of Henry VIII.</p> <p>p. 6. The Elephant in the Market is not an 18th-century coaching inn. As the Queen's Hotel (evolving from the Three Tuns), it is a Victorian inn (and retains its Victorian ground floor frontage).</p> <p>p. 7. The reference to Newbury's "...first industries..." linked to the 18th century is misleading. Industrial activities were carried out in the town in the medieval period, and cloth production was a major export industry in Newbury in the 16th century.</p> <p>p. 7. "The development [Parkway] has successfully integrated 21st century design features into the heart of the conservation area..." is an over-statement which reads like part of a developers' press release. The previous sentence is more than adequate. This development, while generally positive in impact (although it involved the demolition of several listed buildings) should not be recommended in policy as a future design model.</p> <p>p. 7 Is the town council agreed on how Newbury Wharf should be redeveloped? If not, it needs to be very careful about a commitment to "the regeneration of the Wharf area" in policy.</p> <p><u>Section 4.3 The Town Centre</u></p>	<p>Amend text to include the word '<u>medieval</u>' in replace of 'ecclesiastical'.</p> <p>Amend text in 3rd paragraph to read: 'St Bartholomew's School is one of the oldest schools in England, founded on Lady's Day, March 25th evolving from a chantry founded in 1466 in The Litten, a Scheduled....'</p> <p>Amend last sentence of 4th paragraph to remove reference to the Elephant in the Market.</p> <p>Amend text to replace the word 'first' with '<u>following</u>'.</p> <p>Noted. The text within the TDS is not a policy or guideline, but a statement.</p> <p>Noted.</p>	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p>

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	<p>p. 26 Newbury's traditional bricks would normally be described as red and blue (although the blue is more of a grey); rather than <u>pink</u> and blue.</p> <p>p. 26 Although no precise date is known for the establishment of Newbury market, it was a medieval foundation, probably set up in the Norman period. There is a documentary reference from A.D. 1205.</p> <p>p. 26 The town hall clock tower was built in 1881 (separately from the main part of the town hall, which was built 1876-78).</p> <p>p. 28. All areas of Newbury are dealt with by including "Recommended Design Guidelines" in this Statement, except for the most important, Newbury Town Centre, where they are missing. They need to be included.</p> <p>In particular, Newbury Town Council should include a policy for shopfront design, which emphasizes the traditional forms which are most appropriate to the Conservation Area. See the "Shopfront Design Guide" produced by Hackney Environmental Services as an example.</p> <p>It may be felt that this is more appropriately dealt with at West Berkshire level. However, there appears to be no guide of this kind available at West Berkshire level, and in the absence of a Conservation Area Appraisal for Newbury Town Centre, the town centre conservation area and its many listed buildings are particularly vulnerable. Adopting policies similar to those in the Hackney guide, or a relevant selection, would help to close this gap.</p> <p>To illustrate the point, internally illuminated plastic shop signs, and full-height plate glass windows, are not generally appropriate in a conservation area. They detrimentally affect the character of the area.</p>	<p>Amend text to replace 'pink' with the word '<u>red</u>'.</p> <p>Amend text in 5th paragraph to read: '...the Thursday market being a charter market dating back to <u>at least 1596, and may be earlier,</u> and one on Saturday's.'</p> <p>Amend text in 5th paragraph to read: '...its clock tower were built <u>between 1976 and 1881, in 1878</u> with decorative'</p> <p>Agreed. This section (4.3: The Town Centre) needs Recommended Design Guidelines, as set out within other sections.</p> <p>Noted. The following comments need further consideration by the Town Council when developing the Recommended Design Guidelines for the section (4.3: The Town Centre).</p>	<p>Agreed</p> <p>Agreed</p> <p>'...its clock tower were built <u>between 1876 and 1881, in 1878</u> with decorative'</p> <p>Include Design Guidelines - Invite Dr. Peacock to submit his proposals for consideration by the Working Group</p>

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	<p>In addition, guideline principles should be inserted with reference to Victoria Park, along the lines of those relating to Northcroft and Goldwell: "The green space of Victoria Park should be preserved as parkland for recreational use;" and "The design of future development in this area should respect the open aspect and recreational role of Victoria Park."</p> <p>In addition, a policy should be included in this design statement to underline the crucial importance of historic and listed buildings to the character of the town centre, and emphasizing that alterations should aim to preserve and maintain their historic fabric; and that new development should respect them and their settings.</p> <p>These principles do not appear to be adequately reflected in the Vision ("Newbury 2026 - A Vision for Newbury Town Centre"), and need to be put into policy. The Town Council needs to present its view, re-stating policies which it fully supports in its own words, and adding others it feels to be necessary, regardless of the existence of Vision.</p> <p><u>Section 4.7 South and City</u> p. 45 Par 1. St Bartholomew's Hospital ("...the oldest...") dates back to the 13th century or earlier, although the current buildings are from the 17th century.</p> <p>Par 2. In the medieval period the Litten was part of St. Bartholomew's Hospital, then in the 16th century became a base for St Bartholomew's school as well as a chapel for St. Bartholomew's almshouses (a continuation of the Hospital), and continued as both until the middle of the 19th century, when a separate schoolroom was built S of the Litten.</p>	<p>Amend text in 2nd paragraph to read: '....started life as <u>part of St Bartholomew's school</u> and then served the hospital as a chapel. Hospital, then in the 16th century became a base for St Bartholomew's school as well as a chapel for St Bartholomew's almshouses (a continuation of the Hospital), and continued as both</p>	<p>Insert a design guideline relating to the role of Victoria Park</p> <p>Agreed</p> <p>Agreed</p> <p>Agreed</p>

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	<p><u>Section 5 Conclusion</u> p. 62 The importance of the contribution made by historic and listed buildings to the character of Newbury as a whole should be recognized by the inclusion here of a principle that future development should respect them and enhance their settings.</p> <p><u>ADDITIONS</u> In my view, the current shortage of social housing locally should be reflected in two ways: a) The design statement should recognise the importance of the almshouses in Newbury, particularly in the City and St. John's areas, both to the character of the town and as a social amenity. It should state that this will be taken into account as a planning issue for development proposals. b) In addition, given the price of housing for purchase and rent in the Newbury area, and the current shortage of social housing, the design statement should recognise the importance of the existing social housing in and around Newbury, and state that this will be taken into account as a planning issue for development proposals.</p> <p>I can find nothing in the design statement which addresses the height of future development in the town. If the character of Newbury is to be maintained, and a trend towards Basingstoke-style avoided, this needs a specific planning policy. Recent developments and plans for Newbury have included buildings up to 10 storeys tall. I propose that in the town centre conservation area at least, a design guideline recommends that redevelopment should be limited to a height of three storeys at the street frontage, with any higher development (also limited in height) acceptable only at a distance behind the street frontage, to help maintain the existing character.</p>	<p><u>until the middle of the 19th century, when a separate schoolroom was built south of The Litten'.</u></p> <p>Noted. This is covered by policy CS19 of the Core Strategy.</p> <p>Noted. The following comments are matters for the development plan and/or are covered by the Quality Design SPD.</p>	<p>Agreed</p> <p>Agreed that the design statement should recognise the importance of the almshouses in Newbury, particularly in the City and St. John's areas, both to the character of the town and as a social amenity. It should state that this will be taken into account as a planning issue for development proposals.</p> <p>Agreed that the height of re-development should be appropriate for the Town Centre and sympathetic to its surroundings.</p>

All of these elements combine to create greater understanding of the character of Newbury, and will provide the community with the opportunity to understand and communicate what makes their town distinctive, attractive and interesting to live in. However knowledge of this history does not necessarily mean preserving our towns without further change. Understanding how things have changed in the past can stimulate ideas for future actions and we would suggest that there is a wider, more focused range of heritage led design guidelines and opportunities available as part of this refresh. As such we have made some suggestions below for the Council to consider how the plan might make greater use of the towns historic environment resources and to safeguard the features and character that make the area unique.

Identify your designated heritage assets: Ideally this should include the locations of the Listed Buildings throughout the town, as well as the

Noted. Insert the following text to the start of Section 2: Historical Development pg6: The character of Newbury is a product of its historical evolution over centuries. Its history, as a planned Norman

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	<p>Grade II Registered Historic Park and Gardens at Shaw House, Sandford Priory and Donnington Grove and the Registered Battlefield of the Battle of Newbury 1643 (these are the town's 'designated heritage assets') and conservation areas.</p> <p>On-line access to mapped information on listed buildings and other heritage designations such as registered battlefields, and registered parks and gardens is available from Historic England as well as many local Historic Environment Records. It is also important to identify any assets which are on the national At Risk Register.</p> <p>Townscape character and layout: Although designated assets clearly need to be identified as of particular importance in community-led plans, they are only a small part of the overall heritage. In developing the guidelines in the statement we would encourage the Council to give an equal consideration to the location of historic environment resources within and surrounding the town. This can include areas of historic landscape character, as well as both designated and possible non-designated heritage assets (these terms are defined in the National Planning Policy Framework).</p> <p>Character is the shape and look of the town and its surrounding landscape, its pattern of major roads and routes, buildings, bridges, market places, the presence of traditional town industry in Newbury such as its mills, its green spaces, and the shape and pattern of the fields, woods and hedgerows that surround it has built up since its earliest origins and been created by previous generations.</p> <p>In order to help identify and provide a reasonable level of detail on all your local townscapes within the design statement we recommend that the statement could further analyse the number of relatively recent historic environment studies which have been identified on Page 8.</p> <p>Taken together the Historic Landscape Characterisation, the Historic Environment Character Zones and the Newbury Historic Character Study provide much information on the development of the town, defining different areas of the townscape (and identifying those that share characteristics), as well as describing the town in terms of its landscape setting.</p>	<p>market town that prospered as a <u>significant cloth production centre in the late medieval period and which was subject to a variety of economic and social pressures, has left its mark on the physical environment that survives today. Ensuring that the town retains its unique character, as well as allowing it to evolve and change to meet new demands relies on a proper understanding of its history and the significance of the resource handed down over many generations. This is set out in more detail in the Newbury Historic Character Study undertaken in 2006¹ which should therefore be taken into consideration in the design of new development alongside this document.</u></p>	<p><i>history, as a planned Norman market town that prospered as a significant cloth production centre in the late medieval period and which was subject to a variety of economic and social pressures, has left its mark on the physical environment that survives today. Ensuring that the town retains its unique character, as well as allowing it to evolve and change to meet new demands relies on a proper understanding of its history and the significance of the resource handed down over many generations. This is set out in more detail in the Newbury Historic Character Study undertaken in 2006 which can provide further guidance in this matter.</i></p>
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¹ The Newbury Historic Character Study <http://info.westberks.gov.uk/historicenvironmentprojects>

	<p>They are readily available through the use of an interactive online map, which together can create a comprehensive character evidence base, including maps where necessary within your plan.</p> <p>For Newbury considering how its early buildings reflect the historic agricultural, industrial or trading economy of the town, or other aspects of its history, such as the development of the community including serving its religious, educational and social needs, might support the identification of such buildings as non-designated heritage assets to which development proposals will need to respond sensitively.</p> <p>Landscape Setting: West Berkshire Council also have several studies regarding landscape character available which would be useful to cross reference and summarise in your statement of landscape setting as it provides more information on the landscape's aesthetic appeal and sensitivity to change. These are particularly relevant in identifying positive features of the area's landscape (including views) that should be sustained as its distinctive character. In particular it is worth highlighting just how large a contribution Newbury Battlefield and the river valleys make to the area's historic character and landscape setting.</p> <p>Plotting the identifiable extent of the historic parks, battlefield, rivers and landscape settings and other subsidiary features that illustrate the history of development of Newbury could help to document their influence on the character of the area and define the landscape setting that protects their positive characteristics. This may also help to draw out the differences between these areas and areas of historic farmland and the characteristic features of each that are important to the community to protect in planning decisions.</p> <p>Views: If they have not been identified before important key views and lines of sight within the town and the setting of its historic buildings which are important to the community can be identified, and can be depicted on a map with sensitive views to and from the surrounding landscape for example from the battlefield.</p> <p>Design Guidelines We commend the community in setting their own objectives for the design statement. The character of the town and its landscape setting is a product of its historical evolution over centuries, including the significant influence of human management and, as such forms an historical, as well as a natural environment. In managing change through development it is desirable to ensure the contribution of the historic element of its environment (such as the patterns of parkland, woodland, fields and</p>	<p>Noted. Replace the 1st two paragraphs of Section 3: Landscape Setting pg8 to read as follows: The Town of Newbury is set in beautiful countryside, with the canal and rivers cutting an attractive green passage through its centre and along Victoria Park.</p> <p>Geologically the surrounding area is chalk downland being part of the beautiful Berkshire Downs, much of which is part of the North Wessex Downs Area of Outstanding Natural Beauty. The town of Newbury is built on both sides of the valley of the River Kennet and the two plateaux which rise about 20 metres. A mile north the land descends again to the River Lambourn. Two miles to the south at Wash Common the land falls away to the River Enborne. Parts of the residential suburbs of Wash Common are at 120 metres above sea level. This topography produces green corridors alongside the rivers and canal, adding visual relief to the urban environment and provides welcome recreational areas surprisingly near the town centre.</p>	
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	<p>hedgerows) and both their designed and accidental aesthetic value are given consideration (there is also a fine balance between the historical development of these features and their role in the parish's ecological landscape).</p> <p>Guidelines should ensure new development addresses the connections between people and places and the integration of new development with the natural, built and historic environment. We positively encourage the use of guidelines to ensure developments respond to local character and history and reflect the identity of local surroundings and materials (whilst not preventing or discouraging appropriate innovation). Design guidelines can also be used for several areas which share particular characteristics.</p> <p>Regarding the guidance on design principles for each character it would be helpful to explain more what it is thought should happen to reflect and complement the character of that particular character area. For example, should new buildings conform to the predominant height rather than the tallest building height found locally? Where variety is a positive characteristic should new development provide a variety of heights that reflects and sustains this characteristic? To enhance the setting of heritage assets in their vicinity, including views from historic parks and gardens, could new development use landscape buffers and placement of green open space or should they design a frontage that provides an attractive interface with areas of open landscape? Where particular important views have been identified how should these be respected or enhanced?</p> <p>A town statement allows you to identify the way building materials contribute to the place and whether there are problems with using them now. It may be helpful to consider whether there are locations within the town where there is a particularly characteristic range of building materials used. By identifying such locations (or shared locations) and defining the distinctive palette of materials it may be possible to justify a guideline on the contribution a particular distinctive local building material or detail the community may wish future development to respect. Again, we would suggest considering the findings of the Newbury Historic Character Study which provides evidence that may be used in formulating appropriate guidance.</p> <p>Your community led plan provides an opportunity to encourage good design in new development and we note the statement is largely silent about desirable character and appearance that could guide the proposed developments at Market Street and Sandleford. As substantial developments these are likely to have a significant impact on the</p>	<p>The town of Newbury sits within a <u>unique landscape setting created by the natural assets of the Rivers Kennet and Lambourn and the various designed and/or designated landscapes which surround the town, from Shaw House Park and Garden and Donnington Grove in the north, Sandleford Priory to the south, and Newbury Battlefield to the west.</u></p> <p><u>Geologically the surrounding area is chalk downland being part of the beautiful Berkshire Downs, much of which is part of the North Wessex Downs Area of Outstanding Natural Beauty. The town of Newbury is built on both sides of the valley of the River Kennet and the two plateaux which rise about 20 metres. The River Kennet, both upstream and throughout Newbury, is a nationally important chalk stream habitat and is nationally protected as a Site of Special Scientific Interest.</u></p> <p><u>A mile north the land descends again to the River Lambourn, an internationally important chalk stream habitat, reflected in its statutory protection as a European Special Area of Conservation. It is also nationally protected as a Site of Special Scientific Interest. Two miles to the south at Wash Common the land falls away to the River Enborne. Parts of the residential suburbs of Wash Common are at 120 metres above sea level. This topography produces green corridors</u></p>	Agreed
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	<p>character of the landscape, particularly as an impact on the setting of the Registered Park and Garden of Sandleford which may contribute to its significance. For example we recommend that the community can identify views from (and to) the Registered Garden in addition to views from other heritage assets as features that should be given detailed consideration in developing proposals for these sites.</p> <p>Further opportunities</p> <p>A town design statement can not only provide design guidelines but identify other opportunities for conserving and enhancing the town's character. Preparing a design statement offers your community the opportunity to review the condition of key historic, buildings, sites and features, to update the local authority records and play a key part in reversing any deterioration.</p> <p>Action on Conservation Areas: We would recommend that the five Conservation Areas within the Statement area: Newbury Town Centre, Shaw Road and Crescent; Shaw House and Church; Donnington Square and Stroud Green should be clearly identified on a map in the plan as West Berkshire Council has a duty to clearly define why an area has been designated as a Conservation Area, to outline its special interest, and to publish proposals for its preservation and enhancement. This is usually done as part of a Conservation Management Plan, however it appears that none of these conservation areas has a Conservation Area Appraisal or Management Plan yet and, with the approval of the Council, a very positive outcome for the statement would be for the community and Council to assist West Berkshire, or if appropriate even take the lead in producing these appraisals. Completing the required Conservation Area Appraisals would provide an up to date evidence base for the Town Design Statement and could possibly identify further areas that could be recommended for consideration as a Conservation Area.</p> <p>Local Listing: This also provides an opportunity to consider whether other buildings in the town have an historic interest that deserves consideration in planning. This might be supported by consideration of historic maps to help the community see graphically how the town developed as well as in written descriptions.</p> <p>Whilst the park and gardens at Shaw House, Sandleford Priory and Donnington Grove have been recognised as significant through the Registered Park and Garden designation, there remains potential for other historic parks or landscapes to be recognised locally as historically significant and to require development proposals to respond positively to</p>	<p><u>alongside the rivers and canal, adding visual relief to the urban environment and provides welcome recreational areas surprisingly near the town centre.</u></p> <p>Noted.</p>	<p>Agreed</p>
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	<p>these as non-designated heritage assets, including avoiding or minimising harm to their settings.</p> <p>Risk and Green Spaces: Newbury is rich in historic green spaces from its immense English Civil War battlefield site forming the urban-rural fringe to the west, to its intimate registered parks and gardens that provide an important aspect of Newbury's historic character and high amenity value for the community. As some of the most complex and vulnerable assets, it is important to identify these sites as they are likely to be at particular risk through development in the future. Unfortunately both Sandleford Priory and Shaw House are At Risk with extensive significant problems and parts of the battlefield have been built over, and your community can play an important part in reducing this risk.</p> <p>As such we would suggest it is worth considering redrawing the North East Newbury boundary to include Shaw House, its Registered Park and Garden and the River Lambourn, as it is integral to the nucleated settlement cluster of Shaw that resulted in construction of a focus of a small cluster of buildings of a high architectural interest, which, as the statement notes, make an important contribution to the area's character. The creation of the park also had a profound effect on the form of the River Lambourn, which was the main focus for an ornamental canalised water garden, surviving as archaeological evidence in the public open space to the south. We would be interested to see how the design statement could provide more guidance, not only for new development to sustain and enhance the characteristics of the town that are the result of these elements of its past, but also in identifying new local priorities for action to explore, interpret and understand these assets with regards to reducing further harm.</p> <p>Streetscape: Your community's character depends as much on the small details within the street such as walls, fences, signage and street trees as in its architecture and the statement could consider new guidance and recommendations to improve the streetscape when the opportunity arises. Our publication Streets For All can provide more information on best practice for this.</p> <p>We hope these comments are of assistance to the Town Council in moving forward with the Town Design Statement and ensure it provides a positive contribution for guiding change within the rich historic environment of the town and its landscape setting. Please don't hesitate to contact me if you have any queries relating to our comments or would like further information or advice.</p>		
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Environment Agency	Thank you for your consultation on this document. We have no comments to make.	Noted.	
Thames Water (Savills)	<p>Thames Water Utilities Ltd (Thames Water) Property Services function is being delivered by Savills (UK) Limited as Thames Water's appointed supplier.</p> <p>Thames Water are the statutory sewerage (and water) undertaker for West Berkshire and are hence a 'specific consultation body' in accordance with the Town & Country Planning (Local Planning) Regulations 2012. We have the following comments on behalf of Thames Water:</p> <p>Public Realm</p> <p>Thames Water support the creation of more public realm as long as 24/7 access is retained to our water supply/sewerage infrastructure e.g. manholes, which have historically been located within the highway.</p> <p>At present Thames Water can access their water supply/sewerage network infrastructure via normal roadworks / parking suspensions and seek assurance that any proposals will not create additional access restrictions.</p> <p>Trees</p> <p>Thames Water recognises the environmental benefits of trees and supports increased tree planting. However, in order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.</p>	Noted. The following comments are matters to be considered as part of any planning application.	<p>Agreed</p> <p>(Note when planning new trees)</p>
Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT)	<p>Thank you for consulting the Berkshire, Buckinghamshire and Oxfordshire Wildlife Trust (BBOWT) on this Draft Newbury Town Design Statement (henceforth the "Draft Statement"). As a wildlife conservation charity, our comments relate specifically to the protection and enhancement of biodiversity.</p> <p>Newbury Town has a remarkably biodiverse environment, which makes it very important for nature conservation, but this biodiversity is also important for local residents' health and wellbeing. In order to best benefit the Newbury Town community, support the policy and statutory obligations of West Berkshire Council, and best inform local developers about their obligations in respect of biodiversity conservation, we consider</p>	Noted, and responded to below.	Agreed

	<p>that the following two issues need addressing within a revised Draft Statement:</p> <ol style="list-style-type: none"> 1. The Draft Statement includes brief description of some of the natural environment assets within Newbury Town, but we feel that an opportunity has been missed to highlight the national and international importance of some of these assets (i.e. the River Lambourn SAC and River Kennet SSSI). 2. The Draft Statement should also state the national planning policy obligation to embed biodiversity within the design of new developments, in order that local priorities for biodiversity protection and enhancement are effectively delivered as Newbury Town develops. <p>Our detailed comments on these two issues are as follows.</p> <p>1. Recognising Key Natural Environment Assets</p> <p>The River Lambourn runs alongside the northern boundary of North West Newbury and straight through North East Newbury and the Industrial area (as shown on page 2 of the Draft Statement). The River Lambourn is an internationally important chalk stream habitat, reflected in its statutory protection as a European Special Area of Conservation. It is also nationally protected as a Site of Special Scientific Interest. These designations reflect both the unique qualities of the river in this area, and carry obligations in terms of its protection.</p> <p>The River Kennet runs between North West Newbury and Westfields, through the Town Centre and Industrial area and continues beyond the town boundary to a confluence with the River Lambourn. The River Kennet, both upstream and throughout Newbury, is a nationally important chalk stream habitat with the <i>“highest average number of species per site surveyed of any other lowland river in Britain”</i> (Natural England SSSI Citation for the River Kennet). It is nationally protected as a Site of Special Scientific Interest.</p> <p>BBOWT recommends that the statutory designations of these two key natural environmental assets are acknowledged within a revised Draft Statement in order to highlight the unique environmental heritage of the area and the considerations and constraints on built development in the vicinity of these habitats.</p> <p>The recognition of these natural environmental assets within a revised Draft Statement will also help to focus any local biodiversity enhancement efforts (which arise from new developments for example) appropriately, and therefore deliver benefits where most needed.</p>	<p>Agreed – amendments to be made as set out below to reflect these comments.</p> <p>Amendments recommended to text on pg8 of Design Statement in response to comments made by Historic England. See earlier response above.</p> <p>Amend text in first paragraph on pg10 to read: ‘...The A339 flyover imposes the eastern boundary, while the water meadows of the <u>internationally important chalk stream habitat of the River Lambourn</u> form’</p> <p>Amend text in first paragraph on pg18 to read: ‘...The <u>internationally important chalk stream habitat of the River Lambourn</u> traverses’</p>	<p>Agreed</p>
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2. Biodiversity Enhancement with New Development and Local Strategic Priorities

A key national planning policy requirement for all new development is to achieve an overall net gain in biodiversity (National Planning Policy Framework (NPPF) paragraphs 9, 109 and 152). This is further reinforced by the Council's statutory duty under section 40 of the Natural Environment and Rural Communities (NERC) Act 2006 to minimise impacts on biodiversity and provide net gains in biodiversity with new development.

Government guidance on fulfilling this duty states: *"A key purpose of this duty is to embed consideration of biodiversity as an integral part of policy and decision making throughout the public sector, which should be seeking to make a significant contribution to the achievement of the commitments made by government in its Biodiversity 2020 strategy.....The National Planning Policy Framework is clear that pursuing sustainable development includes moving from a net loss of biodiversity to achieving net gains for nature, and that a core principle for planning is that it should contribute to conserving and enhancing the natural environment (<https://www.gov.uk/guidance/natural-environment#biodiversity-and-ecosystems>).*

The revised Draft Statement should therefore state this requirement that all new development should deliver a net gain in biodiversity. This is especially relevant in a design statement because achieving this objective will have a significant impact on the appearance and layout of any new development proposal. For example, the density of buildings that would be acceptable on green field sites depends on what proportion of the site must be reserved for biodiversity conservation in order to meet this obligation. Equally, the design of new buildings should maximise opportunities to embed biodiversity into the fabric and structure themselves (e.g. integrated bat and bird boxes, green roofs on shallow sloping rooftops, rainwater harvesting and sustainable naturalised drainage schemes like biodiverse swales and pond features). **The revised Draft Statement should therefore state the requirement that all new developments must achieve a net gain in biodiversity and where possible embed biodiversity features into the design of the buildings themselves. This revision is required to make sure the Draft Statement is in accordance with the NPPF and is aligned with West Berkshire Council's statutory duties under the NERC Act 2006.**

Noted. This comment is already covered by Core Strategy policies in the development plan.

Agreed

	<p>A corner of North West Newbury lies within the Lambourn Valley Biodiversity Opportunity Area (BOA) and a section of the Industrial area lies within the Kennet Valley East BOA (see: http://berkshirelnp.org/index.php/what-we-do/strategy/biodiversity-opportunity-areas). BOAs identify where nature conservation resources should be focussed in order to achieve the greatest positive impact. For example, within these areas the most appropriate conservation enhancements to carry out (e.g. through developer contributions) include restoring wet grassland and lowland meadow habitats. BOAs should be highlighted within a revised Draft Statement so that readers are made aware of these pre-existing strategic local nature conservation goals, and to help inform the design of local planning proposals.</p> <p>Access to local <i>green</i> space, preferably rich in nature, is an important current public health priority, with access to and use of good quality green space regarded as a factor in reducing health inequalities associated with economic deprivation (Public Health England & University College, London, 2014), and in improving people's health and wellbeing (Faculty of Public Health and Natural England, 2011; Bird, 2007).</p> <p>The Draft Statement currently mentions the importance of the network of local <i>open</i> spaces within Newbury Town. However, there is a distinction between planning for open space (based on Planning Policy Guidance 17) and planning for green infrastructure (based on PPS 12). The requirement for local authorities to develop a green infrastructure strategy is set out in the NPPF (paragraph 114).</p> <p>Natural England defines "green infrastructure" as <i>"a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features. It should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types. Green Infrastructure includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural hinterland. Consequently it needs to be delivered at all spatial scales from sub-regional to local neighbourhood levels, accommodating both accessible natural green spaces within local communities and often much larger sites in the urban fringe and wider countryside."</i> (see: http://publications.naturalengland.org.uk/file/94026)</p>	<p>Noted. This comment is already covered by Core Strategy policies in the development plan.</p>	<p>Agreed</p>
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	<p>In other words, developing a coherent network of green infrastructure throughout Newbury Town should ideally be at least envisioned within the town design statement in order to ensure that a unified network, which suits the needs of the people it serves, is planned for at the local scale. Currently, the Draft Statement makes no mention of green infrastructure. We therefore recommend that a revised Draft Statement refers to the need for green infrastructure to be identified, enhanced, and created within Newbury Town. All new development proposed should be designed to accommodate green infrastructure where appropriate.</p>	<p>Noted. This comment is already covered by Core Strategy policies in the development plan.</p>	<p>Agreed</p>
Natural England	<p>Thank you for your consultation on the above dated 5 October 2017 which was received by Natural England on the same day.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England's Comments</p> <ul style="list-style-type: none"> • Natural England notes and welcomes the planning principles to conserve and enhance the River Lambourn SSSI/SAC and the River Kennet SSSI. In particular, we advise that measures relating to surface and foul water management should be considered through building design to help conserve these riverine ecosystems. We suggest that Sustainable Drainage Systems are implemented for surface water management, and that the use of package treatment plants for foul water management are avoided, especially in areas in close proximity to these designated sites. • Natural England notes and welcomes the planning principles to conserve and enhance the town's green spaces. We would encourage the consideration of strengthening and connecting these green spaces within the wider landscape through incorporating green infrastructure into building design. Multi-functional green infrastructure can perform a range of functions including improved flood risk management, provision of accessible green space, climate change adaptation and biodiversity enhancement. • Due consideration should be given within design principles to avoid impacts on the special qualities of the nearby North Wessex Downs Area of Outstanding Natural Beauty, on protected species and on woodland classified on the ancient Woodland Inventory. 	<p>Noted. These comments refer to matters which are covered by policies within the development plan.</p>	<p>Agreed</p>

APPENDIX B

WBC Economic Development Officer	<p>I would like to make the following observation on the draft TDS:</p> <p>On p.28 reference is made to the “Newbury 2026 - a Vision for Newbury Town Centre” and outlines proposals to create a series of Quarters for Newbury Town Centre. These proposals have now been superseded by subsequent versions of the “Newbury Vision” and no reference is included to the idea of Quarters. The latest version of the document can be found here:</p> <p>http://info.westberks.gov.uk/index.aspx?articleid=30524</p> <p>It is highly unlikely that the Quarter concept will be revisited in the short to medium term.</p>	<p>Noted. Delete text relating to the Newbury 2026 Vision on pg 28 and insert new text relating to the Newbury 2026 Vision in section 2 on page 7 instead.</p> <p>Amend text in last paragraph of pg7 to read: Major new developments are planned for Newbury, <u>and identified within the Newbury 2026 Vision</u>, which could be realized during the life of this Plan, including</p>	
WBC Senior Environmental Health Officer	<p>I have briefly reviewed the statement and recommended design guidelines. I have also briefly looked at the more general planning policy documents on the web site.</p> <p>I note the purpose of the documents is to manage change. I am concerned no mention has been made about the provision of electric charging points. It is the government’s intention to ban all new petrol and diesel cars and vans by 2040. Inevitably there will be a phased change and hybrids and electric vehicles will become more popular before then. In order to facilitate this change we will need electric charging points to ensure a thriving economy/sustainable community. Clearly this will also bring about improvements in public health with better air quality which is to be welcomed too.</p> <p>I think it would be sensible that we prepare for the future and the design guidelines also have regard to the pending changes in vehicles in the future.</p>	<p>Noted. Amend text on page 62 relating to Key Principle No. 2 to read: ‘....new estates here should have good pedestrian and cycle routes into the Town, to minimize dependency on cars <u>and encourage the use of alternative fuels.</u>’</p>	Agreed
WBC Acting Archaeological Officer / Historic Environment Record Officer	<p>Thank you for the consultation on the Draft Refresh of the Newbury Town Design Statement.</p> <p>The archaeology service was not involved in the first edition of this document, although we maintain many datasets which could have contributed to the evidence base, and it is a pity that there is probably limited opportunity now to assist with this Refreshed version. Reduced staff capacity earlier this year may also have hindered good liaison with the Town Council. The West Berkshire Historic Environment Record (HER), the primary index of the historic environment and dynamic information system, has greatly increased the number of records it holds on buildings and structures, both designated and undesignated, which could have fed into the discussion of the various areas. We can also supply further information on other designations – mention of the</p>	<p>Noted.</p> <p>Amendments recommended to text on pg8 of Design Statement in response to comments made by Historic England. See earlier response above.</p>	Agreed

	<p>Scheduled Monuments, Registered Battlefields and Conservation Areas within Newbury, and the Registered Parks just outside it, would add further understanding of the constraints and opportunities within these areas.</p> <p>In addition our Historic Landscape Characterisation (HLC) project mapped current and past land uses. Data is available via our online map (or can be provided to enquirers) eg https://gis1.westberks.gov.uk/ApplicationTemplates/OnlineMap/?vln=HISTORIC%20LANDSCAPE%20CHARACTERISATION&x=447076&y=166809&scale=6.</p> <p>The HLC project is listed on p8 of the statement but no use has been made of it. Historic boundaries and roads which would have influenced the shape of development over centuries and which make the past legible would benefit from consideration in this design statement. Modern developments in the 20th and 21st centuries often utilised existing land parcels, mainly due to single-ownership. Consequently, individual developments often preserve these and this could be taken into consideration with future development, particularly in-filling which would blur these boundaries and potentially remove historic legibility, historic boundaries, or historic routeways which followed them. Designs would benefit from considering the 'shape' of historic landscapes to preserve surviving historic elements – roads, boundaries, hedgerows, trees, structures. Abi Tompkins who has recently joined the team as Assistant Archaeologist, has completed the Oxfordshire HLC project this year and is well qualified to assist in providing further guidance.</p> <p>We would like to make three specific suggestions where evidence from our HLC project seems particularly relevant:</p> <p>1) North West Newbury Area The Oxford Road (p12)</p> <p>The boundaries of Donnington Square survive as a distinct feature in Newbury, surrounded by 20th and 21st century housing.</p> <p>Suggested design principle: Any development should seek to preserve the boundaries of the historic Donnington Square.</p>	<p>Insert the following text under Recommended Design Guidelines, as a key characteristic of the Oxford Road estate (pg13): <u>The boundaries of Donnington Square survive as a distinct feature in Newbury, surrounded by 20th and 21st century housing.</u></p>	<p>Agreed. (Insert picture)</p>
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	<p>2) Industrial Area (p34)</p> <p>A cluster of historic buildings can be found in the north-eastern part of this area, near the confluence of the rivers Kennet and Lambourn. These buildings, which include Ham Mill and Cottage, and what is now Newbury Manor Hotel, were once post medieval corn mills powered by water wheels.</p> <p>Suggested design principle: Any development should seek to preserve and enhance the historic mills and the character of their immediate riverine surrounds.</p> <p>3) Wash Common Character Area Andover Road (p57)</p> <p>To the east of the 20th and 21st century ribbon development along Andover Road, a series of pre-18th century fields and an area of old woodland survive. These rare and historic features preserve the irregular arrangement of the post medieval landscape to the south of Newbury and</p>	<p>Insert the following text under Recommended Design Guidelines, as a design principle (pg13): <u>Any future development should seek to preserve the boundaries of the historic Donnington Square.</u></p> <p>This section (4.5: Industrial Area) needs Recommended Design Guidelines, as set out within other sections.</p> <p>Insert the following text after the 5th paragraph on pg 34 (Industrial Area): <u>A cluster of historic buildings can be found in the north-eastern part of the industrial area, near the confluence of the rivers Kennet and Lambourn. These buildings, which include Ham Mill and Cottage, and what is now Newbury Manor Hotel, were once post medieval corn mills powered by water wheels.</u></p> <p>Insert the following text under Recommended Design Guidelines (see comment above), as a design principle (pg34): <u>Any future development should seek to preserve and enhance the historic mills and the character of their immediate riverine surrounds.</u></p> <p>Insert the following text after the third paragraph under the Andover Road sub-section on pg57: <u>To the east of the 20th and 21st century ribbon development along</u></p>	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p>
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	<p>represent the informal enclosure of the medieval open fields and commons, after which the area takes its name.</p> <p>Suggested design principle: Any future development in this area should maintain the sinuous form of the landscape, using the existing enclosure boundaries to inform the shape of development and internal design.</p> <p>On a separate point, we are sorry that under the section about Newbury's attractions on p7, no mention is made of the West Berkshire Museum, or in fact the considerable offer provided by West Berkshire Heritage (www.westberkshireheritage.org.uk). Arlington Arts outside Newbury is included but not Shaw House apparently which seems a strange omission.</p> <p>Please do consider the information and advice that we can contribute in any further community plans. If possible I would like to see links in this Town Design Statement to our services, eg www.westberks.gov.uk/HER , http://info.westberks.gov.uk/historicenvironmentprojects. Our 2006 publication <i>Historic Newbury, Fit for the Future</i> is also available online http://info.westberks.gov.uk/CHttpHandler.ashx?id=9097&p=0</p>	<p><u>Andover Road, a series of pre-18th century fields and an area of old woodland survive. These rare and historic features preserve the irregular arrangement of the post medieval landscape to the south of Newbury and represent the informal enclosure of the medieval open fields and commons, after which the area takes its name.</u></p> <p>Insert the following text under Recommended Design Guidelines as a design principle (pg58): <u>The design and layout of any future development in this area should be informed by the irregular arrangement of the post medieval landscape.</u></p> <p>Insert reference to West Berkshire Museum and Shaw House on pg 7. Add text to 4th paragraph to read: <u>'In addition the West Berkshire Museum and Shaw House provide a rich source of heritage in the town.'</u></p> <p>Replace final paragraph of Section 3: Landscape Setting on pg8 to read: <u>Further details of the character of the landscape surrounding</u></p>	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p>
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		<p>Newbury can be found in the following landscape character assessments:</p> <ul style="list-style-type: none"> - Newbury District-wide Landscape Character Assessment (Newbury District Council 1993) http://info.westberks.gov.uk/CHttpHandler.ashx?id=36259&p=0 - North Wessex Downs AONB Integrated Landscape Character Assessment (Countryside Agency 2002); http://info.westberks.gov.uk/CHttpHandler.ashx?id=36254&p - Berkshire Landscape Character Assessment (Berkshire Joint Strategic Planning Unit 2003) http://info.westberks.gov.uk/CHttpHandler.ashx?id=36264&p=0 - Historic Landscape Characterisation http://info.westberks.gov.uk/historicenvironmentprojects - Historic Environment Character Zoning http://info.westberks.gov.uk/historicenvironmentprojects - Newbury Landscape Sensitivity Study 2009 http://info.westberks.gov.uk/CHttpHandler.ashx?id=36260&p=0 - Landscape Capacity Assessment (Newbury) 2015 (for the proposed sites in the Housing Site Allocation Development Plan Document in the setting of the AONB) http://info.westberks.gov.uk/CHttpHandler.ashx?id=40259&p=0 	
WBC Highways Development Control Team Leader	I have viewed the statement, and do not have many comments. The only area where I consider where we may struggle with the principles is Monks Lane / Newtown Road area where bigger junctions for Sandford may not enhance the area.	Noted.	Noted.