

<b>General Approach</b>		
<b>Item Number</b>	<b>Item Heading</b>	<b>WBC Approach</b>
1	Boundary Phasing	It is intended that the updated boundary for Newbury Town Centre, both Kennett and Avon Canal Conservation Areas (East and West) and the newly proposed Newtown Road Conservation Area, will all be designated concurrently. The CAAMP document will be updated to make the proposed boundary changes clear in terms of phasing and to highlight that no areas of conservation significance will be left unprotected. Areas proposed to move from the NTC CA to other CAs have been identified as better aligning with the character and appearance of the other CAs, which would facilitate their management in the future. Historic England has confirmed the Conservation Areas would benefit from the same legal protection by designating the updated boundaries alone without an Appraisal and Management Plan.
2	Boundary Changes - General Approach	<p>The proposed boundary changes are in light of up to date planning policy. Given that the conservation area was originally designated in 1971, the planning policy landscape has changed considerable since that time. The original conservation area designation included no supporting appraisal or evidence. It is considered appropriate to conduct an appraisal of the conservation area's current character and condition, in line with Historic England guidance and the council's statutory requirements.</p> <p>The proposed reductions to the NTC Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or unlisted), these buildings alone may not be sufficient to justify the conservation area designations in those locations. It is of paramount importance not to “water down” the special interest of the CA. The NPPF posits that impacts on a conservation area must be considered on the Conservation Area “as a whole;” thus, the larger the CA; and the lesser the quality; the less will be the impact of new development. This may allow developments of greater impact than would be justified on a more tightly confined CA, with high-quality buildings throughout. The higher the quality of the CA, the higher the benchmark is for proposed development. Including areas of lower architectural and historic interest would leave WBC open to challenge. WBC may use Local Listing to protect any non-designated heritage assets that will no longer benefit from conservation area protection as a result of the proposed boundary changes.</p>
3	Boundary Changes - Areas	The proposed conservation area boundary has been reviewed in light of public consultation comments and feedback from Historic England and other stakeholders. The following approach for each area has been agreed:
3a	Boundary Change - Area 1	Previously proposed omission overturned - This area is now proposed to be retained as part of the NTC Conservation Area
3b	Boundary Change - Area 2	Previously proposed omission confirmed - This area has been assessed and found to be of insufficient historic and/or architectural interest to warrant inclusion in the conservation area and would undermine the protection of

		the whole CA. Any unlisted buildings of historic/architectural interest will be considered for protection via local listing as appropriate. Any trees of high amenity value will be considered for TPO.
3c	Boundary Change - Area 3	Previously proposed addition confirmed – General support for this change.
3d	Boundary Change - Area 4	Previously proposed omission overturned - This area is now proposed to be retained as part of the NTC Conservation Area.
3e	Boundary Change - Area 5	Previously proposed addition confirmed – General support for this change.
3f	Boundary Change - Area 6	Previously proposed omission confirmed - This area has been assessed and found to be of insufficient historic and/or architectural interest to warrant inclusion in the conservation area and would undermine the protection of the whole CA. Any unlisted buildings of historic/architectural interest (such as the Georgian Terrace) will be considered for protection via local listing as appropriate. Any trees of high amenity value will be considered for TPO.
3g	Boundary Change - Area 7	Previously proposed omission part confirmed and part overturned. The terraces on Craven Road are to be retained as part of the NTC Conservation Area. The rest of this area has been assessed and found to be of insufficient historic and/or architectural interest to warrant inclusion in the conservation area and would undermine the protection of the whole CA. Any unlisted buildings of historic/architectural interest will be considered for protection via local listing as appropriate. Any trees of high amenity value will be considered for TPO.
3h	Boundary Change - Area 8	Previously proposed addition overturned – the existing conservation area boundary will be retained in this area.
3i	Boundary Change - Area 9	Previously proposed omission confirmed - This area has been assessed and found to be of insufficient historic and/or architectural interest to warrant inclusion in the conservation area and would undermine the protection of the whole CA.
3j	Boundary Change - Area 10	Previously proposed omission confirmed – This area is now proposed to be included within the newly proposed Newtown Road Conservation Area
3k	Boundary Change - Area 11	Previously proposed omission overturned - This area is now proposed to be retained as part of the NTC Conservation Area.
3l	Boundary Change - Area 12	Previously proposed omission confirmed - This area has been assessed and found to be of insufficient historic and/or architectural interest to warrant inclusion in the conservation area and would undermine the protection of the whole CA.

3m	Boundary Change - Area 13	Previously proposed omission confirmed - This area has been assessed and found to be of insufficient historic and/or architectural interest to warrant inclusion in the conservation area and would undermine the protection of the whole CA. Any trees of high amenity value will be considered for TPO.
3n	Boundary Change - Area 14	Previously proposed omission partly overturned - This area is now proposed to be retained as part of the NTC Conservation Area but amended so that the railway line is not included.
3o	Boundary Change - Area 15	Previously proposed omission confirmed - This area has been assessed and found to be of insufficient historic and/or architectural interest to warrant inclusion in the conservation area and would undermine the protection of the whole CA. Any unlisted buildings of historic/architectural interest will be considered for protection via local listing as appropriate. Any trees of high amenity value will be considered for TPO.
3p	Boundary Change - Area 16	Previously proposed addition confirmed – General support for this change. Existing boundary to be updated.
3q	Boundary Change - Area 17	Previously proposed omission confirmed - This area has been assessed and found to be of insufficient historic and/or architectural interest to warrant inclusion in the conservation area and would undermine the protection of the whole CA. Any unlisted buildings of historic/architectural interest will be considered for protection via local listing as appropriate. Any trees of high amenity value will be considered for TPO.
4	Trees	A conservation area is not designated on trees alone. However, if there are trees of historic value, such as having an association with a historic event, this may warrant their inclusion. Otherwise, should any trees of high amenity value fall outside of the proposed conservation area boundary, these will be assessed concurrently with the council's tree officers to assess whether those trees are of sufficient value to warrant a TPO. The council will endeavour to designate TPOs concurrently with the revised conservation area boundary. Open/green spaces and trees that are considered to have a positive contribution to the setting of the CA, such as through screening or as a buffer, should be assessed as part of any planning application in line with Historic England and NPPF guidance.
5	Inventory of Listed Buildings	The CAAMP document will be updated to include an appended simple list of heritage assets (designated and undesignated). It would be disproportionate to conduct a full detailed assessment or photographic record of all notable buildings in Newbury. Such a detailed assessment is not the function or purpose of a Conservation Area Appraisal, which is reserved for Heritage Statements. Instead, this information may be separately captured in the HER or added to the Historic England website as enhanced list descriptions, by local historic groups.
6	Purpose of the CAAMP	The purpose of the Conservation Area Appraisal and Management Plan (CAAMP) is to set out special historic and architectural interest of the conservation area and to set out recommendations for its appropriate future management and decision making. It is a statutory requirement for local planning authorities from time to time to review their conservation areas and provision of a CAAMP is strongly recommended by Historic England. The draft CAAMP includes design guidance and recommendations (chapter 13 in consultation draft dated December 2021). These seek to provide developers with clearer guidance on how proposed changes can

		better conserve and enhance the character and appearance of the conservation area. Future applications will be assessed on a case-by-case basis in line with national and local planning policy. Development must comply with the policies set out in the Local Plan and NPPF. The design guidance and recommendations contained within the CAAMP are advisory and do not hold the same weight as planning policies. However, they will become a material planning consideration, once adopted.
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<b>Individual Responses</b>		
<b>Respondent</b>	<b>Comments</b>	<b>Council Response</b>
Resident	Care should be taken to protect trees within the conservation area when any development plans are submitted. Street parking for residents needs to be clearly marked and retained, visitors and users of the town centre should be encouraged to use other purpose built car parks. There are heavy volumes of traffic on Bartholomew Street, Pound Street and Newtown Road and there should be further traffic free zones or traffic (and speed) reduction measures. Retail mix is important not just high numbers of the same type e.g. nail bars	<p>A conservation area is not designated on trees alone – Please refer to “General Approach” Item No. 4 for more detail. Should any trees of high amenity value fall outside of the proposed conservation area boundary, these will be assessed concurrently with the council's tree officers to assess whether those trees are of sufficient value to warrant a TPO. In such cases, TPOs will be designated concurrently with the updated conservation area boundary.</p> <p>Traffic and parking issues are beyond the scope and purpose of the CAAMP; however, recommendations for appropriate new design of traffic and parking infrastructure and facilities have been provided as part of the CAAMP document.</p> <p>Retail mix is a boarder planning matter that falls outside of the scope and purpose of the CAAMP document; however, recommendations for appropriate new design to ensure economic vitality, in line with local planning policies, has been provided as part of the CAAMP document.</p>
Resident	This document should have been created 50 years ago to protect Newbury's heritage. The people of Newbury & interested parties have not been given enough time to examine & absorb the information in the plan. The reference maps are of poor quality. The process has been anything but open & transparent. There has been no room for public debate on decisions that will affect the lives of the people of Newbury for decades to come. An extremely poor decision-making process. Shame on you.	Noted - The document will be reviewed and simplified, where possible, as part of this ongoing process.

Resident	<p>Area 1 It's important to keep it as a grassed area with trees as a natural protection from the pollution of the A339; &amp; as a wildlife corridor into Victoria Park. Area 2 We need to retain the characterful buildings at the edge of the park &amp; the gateways to Newbury. We are a market town &amp; need to retain a market town aesthetic. When we use Victoria Park or walk thru' it, we need to see characterful buildings &amp; spaces; not dense, modern builds of more than four storeys in height. It's worth noting that a building being listed won't protect it from being altered or knocked down. Area 4 We need trees, mature planting &amp; green spaces throughout Newbury. Especially close to roundabouts where traffic is heaviest &amp; standing idle. Trees are important for wildlife &amp; shade in a hotter environment. Area 6 The West Street 19th century terraced houses are characterful &amp; wonderful to live in. They are built on marsh land, so suffer from subsidence. Any buildings put in their place must have all of that land stabilised; be of our market town aesthetic &amp; not be too densely built, or too high. Area 7 There are lots of older, distinctive buildings, mature trees &amp; landscape in that location, that intrinsically form the character of the area &amp; some act as wayfinders or meeting points &amp; are therefore important to keep. I've lived in Newbury my whole life &amp; am passionate about trying to protect it from inappropriate development.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p> <p>A conservation area is not designated on trees alone. Should any trees of high amenity value fall outside of the proposed conservation area boundary, these will be assessed concurrently with the council's tree officers to assess whether those trees are of sufficient value to warrant a TPO. In such cases, TPOs will be designated concurrently with the revised conservation area boundary.</p>
Resident	<p>Area 6: Subtraction of the area west of Northbrook Street I don't wholly agree with the statements made in section 4.10</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>
Resident	<p>Area 6 section 4.10 This western boundary is complex due to the piecemeal development to the rear of the buildings on Northbrook Street and The Broadway; the historic street and field patterns has been largely lost due to modern commercial development. WBC have developed this themselves, within their own conservation area. This cannot therefore be given as a valid reason to remove the area from</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to</p>

	<p>conservation. Keeping the conservation area should prevent further development and preserve what still is the historic street and field patterns. The proposed changes are to make the boundary easier to understand by running along existing plot boundaries and land divisions, excluding modern development where possible which does not contribute to the special interest of the area. This statement actually provides reason as to why the next one is not a valid statement. Whilst characterful in their own right, the row of 19th century terraced houses on West Street are not of sufficient interest to justify inclusion, especially when this would come at the cost of including neighbouring modern development of an adverse character. This area is not of sufficient historical or architectural interest to justify its inclusion. The 19th century terrace is of special, sufficient and of historic interest to the area due to it being more than likely a Georgian terrace, originally named Carnarvon Terrace, built to house people working for Lord Carnarvon. Looking at the existing boundary and the proposed boundary it is entirely possible to keep the terrace within the conservation area without including WB Council's modern developments.</p>	<p>ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>
	<p>The effect on the surrounding area, especially residential locations, that a re-development of West Street would bring - this may not be stated so far but it is inevitable once the possibility of compulsory purchase can be muted. But the main factor surely if we are keen to preserve the history of Newbury is the connection to the Highclere estate in years gone by.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>
Resident	<p>Only to ask what is wrong with this terrace - what has changed to warrant taking away the conservation protection?</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not</p>

		devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.
Resident	West St look and feel should be protected and invested due to its unique style in Newbury and historical importance. Not subject to slack development rights.	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.
Resident	Things should be left as they are we don't need more flats this close to the town centre.	NA - the purpose of the CAAMP is to set out special historic and architectural interest of the conservation area and to set out recommendations for its appropriate future management. It is not a proposal for development. The council cannot comment on the acceptability of future planning applications in light of current or future local and national planning policy and guidance, including the NTCCAAMP.

Resident	<p>I have learnt that it is proposed that the Conservation Status is removed from West Street. I understand that this could enable 'developers' to demolish the entire street and probably build flats that will not enhance the character or charm of the area. Part of the appeal of Newbury is that it is an historic town, with an interesting past, an old market square, the twice weekly markets, the museum, the Corn Exchange, canal and rivers. Its history is part of its attraction. We have known and loved Newbury for more than forty years and although we left in 2001, we jumped at the opportunity to return here, which we achieved in 2021. Our children were educated here so our links are very strong and we still have many friends here. Obviously, new elements have needed to be added to the town, but surely now is the time to preserve what remains of the old, and this includes West Street, in order that there is a good aesthetic balance in the town which is accessible to all. If West Street is redeveloped, this gem of architecture will be lost for posterity. Should it be demolished it is too late to say "with hindsight this was a mistake". I hope sincerely that the Newbury Town Council will think again and continue the Conservation status on West Street for future generations, as well as the peace of mind for the current residents, many of whom have substantially developed their property. At the time of purchase, it was never envisaged that their investment of time, money and care should ever be at risk. Presenting them with a 250 page document with only 3 weeks for consultation is hardly respectful of their investment in the town or well-being. Kind regards, Richard B. Miller.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>
Local Business	<p>Many areas within the current conservation area have been redeveloped over the years, or built form significantly altered therefore to the point that there is nothing left to 'conserve'. This is certainly the case for the area No.7 in figure 1 of the Conservation Area Appraisal and Management Plan that is proposed for removal from the CA. We support this.</p>	<p>Noted - no further response required</p>
Resident	<p>Area 6 Subtraction of the area west of Northbrook Street. While the modern developments referenced are certainly 'of an adverse character', in particular the ApartHotel known as 'Central Gate', the exclusion of what is described as "row of 19th century terraced houses on West Street" appears to be based either on inadequate research or deliberate misrepresentation. The row of dwellings formerly known as</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The Georgian Terrace on West Street will be considered</p>

	<p>Carnarvon Terrace, and which are now numbers 60 to 88 West Street, are 18th century, not 19th century, having been built in 1796. They are believed to have been built to house artisans associated with the Highclere estate, and are certainly of enough architectural and historic interest either to be included in the existing conservation area or to be designated as a separate conservation area in their own right, excluding the intrusive modern developments.</p>	<p>separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>
<p>Resident/Local Business</p>	<p>Not really sure why this change is necessary, it seems a complete waste of tax payers money. I have read the details but still am of the opinion that it's a waste of time. I do not agree of the area of West Street and the Carnarvon Terrace being outside the area, as now it is inside and the statement that the row of 19thc buildings are of no merit is quite frankly ridiculous. Despite the statement made it seems that once again 'gentrification' is taking place here and these buildings will be in the firing line of more demolition and yet more flats. This row is now the last row of such buildings the other to are past the Lion pub ie Regents Court and were demolished a good few years ago. There no justification to remove any areas from the conservation list especially this are unless this row is listed in the mean time.</p>	<p>It is a statutory requirement for local planning authorities from time to time to review their conservation areas. Provision of a Conservation Area appraisal and management plan (CAAMP) is strongly recommended by Historic England and will be of great value to the future management of the conservation area by informing the assessment of future proposed development and thus the decision making process.</p> <p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3 (specifically 3f) for more details.</p>
<p>Resident/Local Business</p>	<p>Up to date information of all buildings that are of note the residents of Newbury.</p>	<p>Noted - The document will be reviewed and simplified, where possible, as part of this process. It would be</p>

		disproportionate to conduct a full detailed assessment of all notable buildings in Newbury. Such a detailed assessment is not the function or purpose of a Conservation Area Appraisal, which is reserved for Heritage Statements. Please refer to General Approach Item No. 5 for more detail.
Resident	Even in the existing Conservation Area (CA), such as in Bartholomew Street, recent redevelopments have been examples of poor architecture. Proposals for the Kennet Centre are horrendous. I have little faith in WBC's willingness to resist pressure from developers so any reduction in the CA would increase this pressure.	Provision of a Conservation Area appraisal and management plan (CAAMP) is strongly recommended by Historic England and will be of great value to the future management of the conservation area by informing the assessment of future proposed development and thus the decision making process. The draft conservation area appraisal includes design guidance and recommendations (chapter 13 in Consultation draft dated December 2021). These seek to provide developers with guidance on how proposed changes can better conserve and enhance the character and appearance of the conservation area. This would also apply to the area of the Kennet centre.
Resident	Restrictions on the construction of oversized apartment blocks	NA - the purpose of the CAAMP is to set out special historic and architectural interest of the conservation area and to set out recommendations for its appropriate future management. This document cannot impose such prescriptive restrictions on development, and future applications will be assessed on a case-by-case basis in line with national and local planning policy. Development must comply with the policies set out in the Local Plan and NPPF. The design guidance and recommendations contained within the CAAMP are advisory only and do not hold the same weight as planning policies. However, they are a material planning consideration, once adopted.
Resident	I've heard that it has been proposed to remove West Street from the Conservation area, and I'd like to know why this is.	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to

		<p>ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>
Resident	<p>I object to the proposed changes in Areas 1, 2, 4, 6, 7, 10, 11, 14, 15, 17. Areas 2, 6 and 7 require detailed discussion, which has not taken place. Removal of Area 4 should never have been considered. Removal of Area 17 is controversial, and needs open discussion. Not enough consideration has been given to the positive impact on the conservation area of trees etc in many of the areas identified for removal.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p> <p>A conservation area is not designated on trees alone – Please refer to “General Approach” Item No. 4 for more detail. Should any trees of high amenity value fall outside of the proposed conservation area boundary, these will be assessed concurrently with the council's tree officers to assess whether those trees are of sufficient value to warrant a TPO. In such cases, TPOs will be designated concurrently with the updated conservation area boundary.</p>

Resident	The draft Appraisal includes no detailed information about the (nationally) listed buildings in this Conservation Area. Best practice would be (at least) to least and photograph each listed building, plus additional heritage assets.	It would be disproportionate to conduct a full detailed assessment of all notable buildings in Newbury. Such a detailed assessment is not the function or purpose of a Conservation Area Appraisal, which is reserved for Heritage Statements. Please refer to General Approach Item No. 5 for more detail.
Resident	The boundaries shown for the existing town centre Conservation Area are not accurate. The town centre Conservation Area joins the two adjacent canal conservation areas (K & A Newbury East and K & A Newbury West) much further east and west of Newbury bridge. Unless WBC has other information, the boundaries are those set with the last extension of this conservation area in 1990, which is not even mentioned in this Appraisal. The effect of the current undeclared boundary changes for the town centre conservation area would be to remove the Newbury Lock area, West Mills (the street and the mill area), and part of Northcroft; and West Berkshire Museum (two buildings, Grade I and Grade II* listed) and the area of Newbury Wharf in front of it from any conservation area. The Appraisal needs proof-reading. It includes many errors, with even street-names given incorrectly. It would have been helpful to involve the local community in the preparation of this draft (in line with guidance from Historic England), which could have avoided many errors. An Appraisal for this area is long overdue; the first parts of this area were designated in 1971, and this is the first draft Appraisal, 52 years later.	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Please note that some sites are proposed to be included within other neighbouring conservation areas, such as West Berkshire Museum. Please refer to "General Approach" Item Nos. 1, 2 and 3 for more details, including the revised approach for each area.</p> <p>Noted - The document will be reviewed and simplified, where possible, as part of this process.</p>
Resident	Removing the conservation status puts these historical areas at risk of redevelopment. Newbury town centre has so much historical relevance and interest and should not be ruined by further modern redevelopments, the character of the town will be eroded. I have no objections to expanding conservation areas. There are plenty of areas within a respectable walking distance of the town centre and rail station where developments would be more appropriate, I appreciate this is not about development planning, but it does open considerable risk.	Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation

		area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.
Resident	The area known as Canarvon Terrace has historical interest in architecture which could be lost if these boundary changes are made.	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.
Resident	Except I think Area 1 should be included as an extension to the green areas of Victoria Park and a continuation of the tree line along the A339	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 1 is now proposed to be included. Please refer to "General Approach" Item Nos. 2 and 3a for more details, including the revised approach for each area.  A conservation area is not designated on trees alone – Please refer to “General Approach” Item No. 4 for more detail.
Resident	I strongly think as a Town centre CAAMP that the Kennet area West and East should be incorporated in to an even larger document. The River Kennet and K&A canal are integral to the town and these two areas should NOT be separate. They should be updated if necessary and incorporated.	The Kennet and Avon Canal Conservation Areas (east and west) are already separate conservation areas and will remain so. It is against best practice to combine conservation areas, as larger conservation areas are more difficult to manage. The CAAMP will provide an appraisal of the updated Newbury Town Centre

		Conservation Area only, although its wider setting and the presence of the two neighbouring canal conservation areas will be briefly acknowledged.
Resident	I agree with the Policies and Recommendations. Appendix 1: Positive Contributors: I feel it is shocking so many key buildings have not been locally listed. I agree with the priorities. I hope new staff will enable this to take place very soon I agree with many comments adjacent to the photographs. The comment against Figure 38 Parkway commenting on the height of buildings and lack of furniture is laughable considering Lochailort's 10/11 storey proposals which I strongly dislike As multi-storey car parks go, I think the Kennet Centre car park is okay. I dislike the brick wall and engraved panels further along. Shop fronts and signs are often a detraction to the existing conservation areas - agree with the examples given	N/A – No response required
Resident	Area number 6, West Street terrace. The houses in this terrace date back to the 1800s and has links to the Carnarvon Estate as it was built for the workers. This is important local history . We call our town historic Newbury so let's look after that and make sure we protect the history of the working people and not just the more wealthy folk	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.
Resident	Despite its additions/removals complexity, on balance, no obvious reasons to object.	Noted - The document will be reviewed and simplified, where possible, as part of this process.

Resident	It needs a thorough proof read as there are numerous errors.	Noted - The document will be reviewed as part of this process.
Resident	Will any of these changes allow the plans such as the proposed Eagle Quarter development to be refused? (If not, what is the point of this document?)	NA - the purpose of the CAAMP is to set out special historic and architectural interest of the conservation area and to set out recommendations for its appropriate future management. It is not a proposal for development. The council cannot comment on the acceptability of future planning applications in light of current or future local and national planning policy and guidance, including the NTCCAAMP.
Resident	Measures to prevent plans on the scale of the Eagle Quarter development from being proposed, in terms of height of main blocks, and height of the perimeter.	This document cannot impose such prescriptive restrictions on specific developments, and future applications will be assessed on a case-by-case basis in line with national and local planning policy. Development must comply with the policies set out in the Local Plan and NPPF. The design guidance and recommendations contained within the CAAMP are advisory only and do not hold the same weight as planning policies. However, they are a material planning consideration, once adopted. These recommendations will provide guidance for developers.
Resident	I cannot understand why the 19th centre character houses in what is now west xt are being demister, surely these are the sorts of things that should be being preserved.	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those

		locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.
Resident	We should keep and enhance the buildings for future generations. We put up characterless buildings which will put Newbury into the boring town and we will lose our character.	The ongoing development of the draft conservation area appraisal includes design guidance and recommendations (chapter 13 in Consultation draft dated December 2021). These seek to provide developers with clearer guidance on how proposed changes can better conserve and enhance the character and appearance of the conservation area.
Resident	Looks very thorough, but was it worth all the effort? Why not include all the areas? Removing Area 6 which includes West Street's "Carnarvon Terrace" seems to be an odd decision as there are numerous worthy buildings cut off by less worthy ones. Surely a simple boundary with additions should have been the answer.	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.
Resident	It's very interesting, but also very long and difficult to comment on. I am concerned why the boundaries needed to be reduced anywhere as the justifications are not strong. Also I spotted some typos... P.16 Fig 1 map has Kennet & Avon Canal East Conservation Area and Kennet & Avon Canal West Conservation Area the wrong way round! P.19 Area 12 title Subtraction of the area to the south of Derby Road and south of the St John's roundabout (4.16) has the wrong title - same title as Area 10 (4.14) P.21 title Kennet	Noted - The document will be reviewed as part of this process.

	and Avon Canal East Conservation Area (4.24) should read West (4.23 is East) P.40 Fig 9: OS Maps 196, 1-25000 (date incomplete 196?)	
Resident	Concern that the terraced houses in West Street have been itemised as 19th century while they are in fact 17th century houses constructed by the Carnarvon family for their estate workers.	Noted - The document will be reviewed as part of this process
Resident	The fact that this extremely important document, states the age of the houses in question, are incorrect by 100 years, leads me to believe this has not been given sufficient thought. Most certainly this very important error must be corrected and the proposal resubmitted and WBC must be made aware of this blatant error.	Noted - The document will be reviewed as part of this process
Resident	My previous comments do question the ability of the people that prepared this draft. I presume Lord Porchester has been made aware of the recommendations in the draft to properties built by his ancestors.	NA - the required consultees have been notified as part of this process, and the draft document has been publicised as part of this public consultation process.
Resident	Proper discussion with residents who it will affect	Noted - Comments in relation to the first draft have been considered and the document will be reviewed as part of this process.
Resident	The existing areas. Do not reduce the conservation area.	Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.
Resident	The proposal to change the status of the terraced houses, originally Carnarvon Terrace, in West Street has no purpose in the whole format of Newbury as a historical town. Those houses are from the exterior a shining example of what used	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required

	<p>to be, are representative of hundreds of years of our history as they were built in the 1700's. If they were derelict or uncared for it would be a different matter but they are homes that have stood the test of time are loved not only by their current residents but all of us that have lived there with our memories of it being a good place to live and our memories of those who lived there with us and are now gone. Wake up West Berks Council and stop trying to damage the town any further by potentially setting the potential for development by removing what little protection they have.</p>	<p>to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>
Resident	A sensible approach to what the town really needs.	NA - no response required
Resident	<p>If the result is to pretty up the town then that is admirable. However if the Council want to do something worthwhile then get all the residents of West Street, with a suitable grant for the works to revitalise the front gardens and create a pleasant experience for town visitors who access the car parks.</p>	<p>NA - this is not the purpose of function of this document. The purpose of the CAAMP is to set out special historic and architectural interest of the conservation area and to set out recommendations for its appropriate future management and decision making.</p>
Resident	<p>There is a drastic and irresponsible approach to reduce the conservation area within the town centre and Kennet waterway that undermines the council's position to protect the area for future generations. These oversights are very prominent in reducing green space covered and reducing the scope of the protected area. E.g.: the substantial reduction of the cemetery, green spaces around the rail line, around the Kennet, around Victoria park and around the high-street. It would be irresponsible to allow the following areas to be removed: - 1, 2, 4, 6, 7, 9, 10, 12, 13, 14, 15, 16 and 17. Irrespective of past errors which have de-characterised the area (via construction), the council shall not permit, via one of its biggest tools, to further allow de-characterisation of the town centre conservation area. The proposal does have some quality of life improvements such as: - updated boundaries in region marked as 5.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p>

		Clarification - there are no removals to greenspaces proposed, Only the removal of various verges which do not actively contribute to the character and appearance of the conservation area. These removals seek to make the boundary clearer by following existing townscape features. The cemetery is not proposed to be removed, but to become part of a separate conservation area, known as Newtown Road Conservation Area.
Resident	No need to change West Street. Leave alone and change it's name back.	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.
	Stop building eyesores e.g. Train station and Bartholomew flats in the town centre. Demolish the BT tower instead.	The ongoing development of the draft conservation area appraisal includes design guidance and recommendations (chapter 13 in Consultation draft dated December 2021). These seek to provide developers with clearer guidance on how proposed changes can better conserve and enhance the character and appearance of the conservation area.#
Resident	I don't understand the need to remove any areas from the conservation area. Presumably the current areas were defined at some point because of their value or a need to be	Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic

	<p>part of the area. Now the phrase seems to be "not of sufficient interest". Why and how has this changed to be uninteresting or is it the views of the author(s) that differ from previous recommendations that has changed? Have the areas changed since the plan was drawn up originally or do the authors of the current plan have a different mind set? If the areas have changed, how is this possible if it's a conservation area. If the perceptions have changed then are these views right and why are previous views now disregarded? This is relevant to all Area Numbers where they are to be removed from the Conservation areas.</p>	<p>England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p> <p>The boundary changes are in light of up to date planning policy. Given that the conservation area was originally designated in 1971, the planning policy landscape has changed considerable since that time. The original conservation area designation included no supporting appraisal or evidence. It is considered appropriate to conduct an appraisal of the conservation area's current character and condition, in line with Historic England guidance.</p>
Resident	<p>This is quite clearly a cynical ploy to enable further development in sensitive areas of Newbury. Zone 6, especially, should remain in the conservation area. The council have lost their way, and aren't representing the will of the town any more. We don't want your 'neighbouring modern development'</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those</p>

		locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.
Resident	If this is changed there will be more flats built in the town centre	NA - the purpose of the CAAMP is to set out special historic and architectural interest of the conservation area and to set out recommendations for its appropriate future management. It is not a proposal for development. The council cannot comment on the acceptability of future planning applications in light of current or future local and national planning policy and guidance, including the NTCCAAMP.
Local Business	Think the new boundary includes to many residential dwellings	Noted - the proposed boundary is being reviewed in light of public consultation comments. There is no restrictions or specific guidance on the proportion of residential buildings that can be included within a conservation area. On balance, the updated boundary contains fewer residential buildings owing to the proposed removals.
Local Business	Yes I am concerned as at number 46 Cheap Street. It is medium importance for listing on the plan. It is noted that it has Stucco frontage and that it is a house. This is not the case any more. It should not be listed as the reasons for the listing does not exist.	Noted - The document will be reviewed as part of this process
Other – nearby village resident	Not enough consideration has been given to the loss of protection to old buildings and trees, which will significantly affect the rest of the town CA. The boundaries in respect of the two Kennet CAs is just plan wrong and if the subtractions go ahead big areas will fall outside any CA.	Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please note that some sites are proposed to be included within other neighbouring conservation areas, such as West Berkshire Museum and others. The boundaries for neighbouring

		<p>CAs will be updated/adopted concurrently with NTC. Please refer to "General Approach" Item Nos. 1, 2 and 3 for more details, including the revised approach for each area.</p> <p>A conservation area is not designated on trees alone – Please refer to “General Approach” Item No. 4 for more detail. Should any trees of high amenity value fall outside of the proposed conservation area boundary, these will be assessed concurrently with the council's tree officers to assess whether those trees are of sufficient value to warrant a TPO. In such cases, TPOs will be designated concurrently with the updated conservation area boundary.</p>
Other – nearby village resident	How about historical fact?! Detailed analysis and record of listed/locally listed buildings. Inadequate appreciation loss of area of trees would make to the remaining CA. Consultation of local experts.	Noted - The document will be reviewed as part of this process. It would be disproportionate to conduct a full detailed assessment of all notable buildings in Newbury. Such a detailed assessment is not the function or purpose of a Conservation Area Appraisal, which is reserved for Heritage Statements. Please refer to General Approach Item No. 5 for more detail.
Other – nearby village resident	Please refer to my email to the council [name supplied] and my comments included in the response from the Newbury Society.	Noted - The document will be reviewed as part of this process
Resident	2 ) The houses of St Marys Place and path should be included in the conversation area boundary. They are of historic importance and lead onto Victoria Park this area should continue to be in the boundary although except areas behind the buildings could be removed from the boundary.	Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to

		"General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.
Resident	Pictures of some of the beautiful buildings you are removing from the boundary area.	Noted - the proposed boundary is being reviewed in light of public consultation comments. All photography and surveys were undertaken as part of the 2021 document and it is not currently proposed to update this.
	But any amendments that seek to reduce the Conservation area should not be made	Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.
Resident	It needs to be clearer for residents to understand. A summary document would have been useful.	Noted - The document will be reviewed as part of this process.
Resident	As a Newbury resident of 10 years, part of the reason we chose to move to this town was that it still maintained a historic market town feel. The excess of new homes and flats have begun to spoil our town in more recent years so keeping our conservations areas protected is of paramount importance. In recent months, we were pleased to see West Berks council refused planning for a 67 bed care home in a conservation area bordering the canal and a historic part of our town. We need a council that respects these special areas of our locale and protects us from the continuing greed of developers.	NA - the purpose of the CAAMP is to set out special historic and architectural interest of the conservation area and to set out recommendations for its appropriate future management. It is not a proposal for development. The council cannot comment on the acceptability of future planning applications in light of current or future local and national planning policy and guidance, including the NTCCAAMP
Resident	I wish to comment on the old Terrace in West st, formerly known as Caernarvon Terrace. I live in number 64, and the	Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been

	<p>deeds tell me that it was built in 1796. I believe that this terrace is part of Newbury's heritage and should be conserved. To be in a conservation area is the best way to do this. The buildings have been somewhat disregarded and are a bit shabby, though I have done mine up and extended the kitchen, and it is a lovely house to live in, and right in the town centre. I suspect that the reason for removing the conservation area status that protects them now, is to allow development of the area for more flats - the plot of the whole terrace is really quite large, with room for parking at the back of each house.</p>	<p>reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>
Resident	<p>Consideration of protecting Newbury's historic buildings in West st terrace. These houses were built by the Caernarvon family for their craftsmen, so they could live in town as well maintain Highclere Castle. I believe this is part of the history of the area and should be protected by being in a conservation area, and also be improved.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>

Resident	I have made my thoughts in the previous two boxes, but would like to say that I will pursue this matter with publicity if necessary.	NA - no response required
Resident	Westbourne Terrace and the Old police Station development have been included, when they are a mishmash of sixties and seventies uncontrolled development. Additionally the school and adjacent houses have not been included. There is no period character, but the conservation area status prevents the building beings being expanded to two bedrooms, or alternatively having uninsulated external bathrooms. Westbourne Terrace and the Old Police Station development should be removed from the conservation area, as it imposes restrictions, without any benefit to the residents, or community.	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p> <p>It is important to assess the character of the area as a whole, and not simply as individual buildings. The areas of Westbourne Terrace and the Old Policy Station are considered to be of sufficient character as a whole to justify their retention as part of the conservation area.</p>
Resident	I have the feeling that the proposals have not looked at the area from the point of view of aesthetics and appears to be a formula for wasting money on the part of the council and restricting the freedom of the landlords/community to development the area to the best commercial use. I believe whatever the wishes of the community, the council will ignore them as they have done elsewhere in Newbury.	<p>It is a statutory requirement for local planning authorities from time to time to review their conservation areas. Provision of a Conservation Area appraisal and management plan (CAAMP) is strongly recommended by Historic England and will be of great value to the future management of the conservation area by informing the assessment of future proposed development and thus the decision making process.</p> <p>The ongoing development of the draft conservation area appraisal includes design guidance and recommendations (chapter 13 in Consultation draft dated December 2021). These seek to provide developers with clearer guidance on how proposed changes can better</p>

		conserve and enhance the character and appearance of the conservation area.
Resident	The plan is very complex for a normal resident to understand, in my case anyway. So I am not sure if my answer is correct in relation to the question, cross referencing with the plan. So to be clear. I do not feel any conservation area, nature, wildlife, protected areas or areas of natural beauty should be altered. Any areas of this nature should only be protected, enhanced and made bigger. Not subtracted.	Noted - The document will be reviewed as part of this process  Clarification - the conservation area's purpose to conserve and enhance the character and appearance of the area (which is of historic and architectural interest). It does not relate to conservation of nature and wild life
Resident	Maybe a general overview of the purpose of all of this. Are you wanting to protect natural areas or amend or remove them.	Clarification - the conservation area's purpose to conserve and enhance the character and appearance of the area (which is of historic and architectural interest). It does not relate to conservation of nature and wild life
Resident	It will more than likely make no difference, like always with this stuff. But I fully promote any conservation areas to be kept natural. Children, people and animals need more natural beauty and not more buildings and planning etc. Thanks	The ongoing development of the draft conservation area appraisal includes design guidance and recommendations (chapter 13 in Consultation draft dated December 2021). These seek to provide developers with clearer guidance on how proposed changes can better conserve and enhance the character and appearance of the conservation area.
Resident	I believe that the Town Centre Conservation Area should extend further from the Town Bridge.	Noted - the proposed boundary is being reviewed in light of public consultation comments. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.
Resident	More references to the canal towpaths and views from them into the town centre.	This would not normally be included within the scope of the Newbury Town Centre CAAMP. However, key views from the tow paths have been included.
Resident	A lot of thought and time has gone into this plan and I'm pleased you're considering the aesthetics of the town centre more and trying to secure a character for it. It's a shame it wasn't in place before Weavers Yard was green-lighted as I feel this development is at least a couple of storeys too tall for the surrounding area and will oppress and darken that end of town. On Pg.17 you mention the grass verge to the northeast of Victoria Park and that it makes a limited contribution to the conservation area. I'm concerned it may be singled-out for redevelopment/housing. Please try and keep	NA - no response required

	<p>this green and tree-lined. I think this would be important for the people living so close to the A339, especially as the properties there don't have much in the way of gardens. Also, it's nicer for drivers to see the trees and it makes that horribly busy road feel more spacious. It's far more gentle on the eye than what's on the other side of the A339. I also noticed you mentioned that retail units should not be converted to other uses, such as housing. I welcome this idea but fear we now have more than enough shops, so please, no more as there are already too many empty units. Please work on attracting good retailers back to Newbury. I really miss the John Lewis and wish an agreement had been come to in order to retain it. And of course, the loss of Debenhams (though this was not just a local issue).</p>	
Resident	<p>What made the council extend the conservation area ? And what is the true purpose for it ?</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p>
Resident	<p>It may be good for some rich people to live in conservation areas by middle class will be affected and can cause discrimination and other major issues long term.</p>	<p>NA - no response required</p>
Resident	<p>It is unclear what boundary amendments are being made. For example Area 1 Northeast grass verge - the map provided is not detailed enough to determine clearly where the grass verge is or the change that is being made.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its</p>

		special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.
Resident	Maps should be more detailed with grid references to ensure clarity of intent is given. No impact statement is provided or clarification to a lay person as to what the change will mean. Information provided without clarity of intent is meaningless.	Noted - The document will be reviewed as part of this process.
Resident	From past experience West Berkshire have failed to adequately resource the management of their existing designated Conservation areas. Good PR but poor delivery inevitable under the current regime.	NA - no response required
Resident	You have all these long winded drafts about history and stuff, you have colourful maps which to the ordinary person mean not very much. WHY are you amending these boundaries - you have not as far as i can see stated why the real reason not guide lines from the government u know pass the parcel stuff. Is this to do with you building more housing perhaps? YES or NO will suffice. Will you be adding 5g towers again yes or no - ref you need an environmental survey for each tower just so that you know this has been decreed via the High Court in England, as yet you have not produced one single environment survey for the effects of a 5 g tower so your already breaking the law in this moment and planning to add more to the Newbury areas.	<p>Noted - The document will be reviewed as part of this process</p> <p>Noted - the proposed boundary is being reviewed in light of public consultation comments.</p> <p>NA - the purpose of the CAAMP is to set out special historic and architectural interest of the conservation area and to set out recommendations for its appropriate future management and decision making. This draft NTCCAAMP is an independent document and has not been produced in response to, or anticipation of, any proposed future development that may come forward. Future applications will be assessed on their own merits or demerits, and will take up-to-date planning policy into consideration as part of the decision making process. This document, once adopted, will inform that decision making process, and will provide developers and householders with additional understanding and design</p>

		guidance to better conserve and enhance the character and appearance of the conservation area.
Resident	A simple explanation for people who are not map makers, town planners and get confused with all your spin and colourful maps, simple why are you making a draft and who instructed you to do this which property development organisation.	It is a statutory requirement for local planning authorities from time to time to review their conservation areas. Provision of a Conservation Area appraisal and management plan (CAAMP) is strongly recommended by Historic England and will be of great value to the future management of the conservation area by informing the assessment of future proposed development and thus the decision making process. This draft NTCCAAMP is an independent document and has not been produced in response to, or anticipation of, any proposed future development that may come forward. This document was instructed by the council, in line with best practice and Historic England guidance. This document is not affiliated with any developer, land owner or otherwise.
Resident	I would like to trust what you have supplied but you have not made it simple for a reason right? Why are you changing the boundaries.	Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.
Resident	Don't think it will make overmuch difference.	NA - no response required
Resident	The opinion and agreement of Newbury Town Council - does this map against their plans?	Newbury town council has been consulted as part of this consultation process.

Resident	It's professional and difficult to criticise but as someone famous once said 'this pudding has no theme'.	NA - no response required
Resident	please make new developments in the town centre sympathetic particularly in the height of new buildings.	The ongoing development of the draft conservation area appraisal includes design guidance and recommendations (chapter 13 in Consultation draft dated December 2021). These seek to provide developers with clearer guidance on how proposed changes can better conserve and enhance the character and appearance of the conservation area.
Resident	You could make the map a bit clearer, name roads.	Noted - The document will be reviewed as part of this process.
Resident	1,2,4,6 and 7: It's difficult to understand the reasoning for exclusion UNLESS it's to earmark those areas for development. In particular, 1) the strip is part of an already curtailed Victoria Park and could have a useful purpose; 2) the attractive Georgian terrace fronts the remnants of WW2 defences embedded in the path - on both counts that merits retention within the conservation boundary; 4) dismissal of the area because buildings are listed is a spurious argument - listing hasn't prevented demolition in the past; it's particularly important to protect the buildings on the E side of Oxford Road; 6) Carnarvon Terrace in West Street is a now precious example of C19th dwellings - often occupied by teachers; 7) this area needs to be protected, it's part of the earliest settlement. Until and until credible reasons for excluding areas are provided, there is absolutely no reason why they should be. I hope the exclusion isn't a ham-fisted attempt to earmark areas for development.	Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.
Resident	The most glaring omission is under 6.8: The single sentence fails to adequately describe the significance of nonconformity in Newbury - from 1640s to the present day. You list the almshouses, but not the nonconformist groups (let alone their places of worship - some now demolished, others converted, and some still in use). During the Civil War and beyond, Newbury was known to be a nonconformist town (both politically and spiritually) - a single sentence is insufficient. MAPS (section 6): Consider the inclusion of the 1720s'	Noted - The document will be reviewed as part of this process  This document intends to provide an overview of character, architectural and historic interest; it is not intended as a complete history of Newbury and it would be disproportionate to do so. Such a detailed assessment is not the function or purpose of a Conservation Area Appraisal, which is reserved for Heritage Statements.

	<p>William Stukeley map and the 1730s' Duke of Chandos map - both in the collections of West Berkshire Museum, and both showing the town centre. ART WORKS (7.20): I question the inclusion of Two Rivers as a "work of art" - it resembles stained streaks on the side of a wholly unattractive block ... and this is what greets rail passengers as they enter Newbury. Symphony of Trees is another questionable inclusion - nice idea, but so poorly executed that it is now in a sorry state. You have omitted Paul Forsey's mosaic embedded in the paving outside Newbury Library. LISTED BUILDINGS (Fig 57): The Cloth Hall is Grade I, the Corn Stores Grade II* ... on your plan they are both designated Grade II. Unless, horrifyingly, you have failed to include these two iconic buildings at all. Fig 149: This was the dwelling of John Winchcombe, rather than 'Jack of Newbury'. For too long, Newbury has been subjected to confusion over the identity of the latter, whereas John Winchcombe the Tudor clothier is immediately identifiable. POLICIES: These need to be worked up to form a document for use by planners and developers; it needs more specific detail, including pictorial examples.</p>	
Resident	<p>5 minutes to complete?! This exercise has been rendered more difficult by the length of the document, and the problems of navigating it. There needs to be a separate document (reviewed periodically) with clear details (including illustrations) of building materials, design features, street furniture, shop frontages, signage, interpretation etc permissible within the conservation area. It should be the 'go to' document for planners and developers. Archaeology and Conservation must be included in all planning matters within the conservation area; other interested groups (eg Newbury Society) and qualified individuals should also have the opportunity for inclusion. Pay attention to the 1973 publication 'Newbury Buildings Past and Present' published by the Borough Museum. I wish I had the energy to spend several hours scrutinising this important document. I fear others will give up, as I now have.</p>	Noted - The document will be reviewed as part of this process
Resident	<p>I believe the revised area should preserve key buildings and characterful areas of our lovely town.</p>	NA - no response required

Resident	Area 11 is a car parking lot/car wash. I looked on historical google maps and the facing of the car park onto Link Road used to have bushes which covered it up. I feel like that use of planting to hide unsightly but necessary areas could come back to make Newbury feel nicer.	NA - the council cannot comment on, or anticipate, future changes that may be proposed, including changes to planting and vegetation. However, the recommendations set out in chapter 19 of the draft NTCCAAMP encourage the provision or retention of planting, soft landscaping and other appropriate vegetation.
Resident	West Street is mainly residential without a lot of character now so the proposed subtraction makes good sense.	NA - no response required
Resident	I have checked a few changes, and they seemed well reasoned.	NA - no response required
Resident	Some of the maps and history seem a little superfluous and add to the feeling that nobody with just an hour to spare could possibly get to the bottom of what is being proposed or why.	This is an appraisal document of the conservation area, reviewing its current character and condition, as well as providing an overview of the existing building stock. It also highlights any issues within the conservation area (design, planning, townscape and heritage matters only) and puts forward recommendations and design guidance to assist householders and developers to inform the design of future proposals, and also provide a guide for assessing proposals as part of the council's decision making process.
Montagu Evans on behalf of Lochailort (Kennet Centre)	<p>Newbury Corn Exchange Car Park (11.7)  This should be identified as a negative contribution to the conservation area. Paragraph 11.7 of the draft CAA to identify the potential for car parks to be unattractive features within the conservation area. This extends to the large areas of car parking to south of the Kennet which lack amenity or high-quality public realm. The draft CAA should also acknowledge the adverse effect of the Newbury Wharf Car Park, the Newbury Central Car Park and the bus station on the setting of the conservation area as illustrated below [photographs supplied]</p> <p>4.20 Addition of Area 16  We do not agree that the post office yard makes a positive contribution to the character and appearance of the conservation area and should remain excluded from the boundary. The purported historic interest of the yard is not defined. The negative influence of the yard is illustrated below [photographs supplied]</p>	<p>Thank you for your detailed consultation comments following the public consultation on the draft Newbury Town Centre Conservation Area Appraisal and Management Plan. We have carefully considered your comments and have provided responses to the various points you have raised in your document below.</p> <p>1. Paragraph 11.7 (Car Parks)  We agree that some car parks within the CA exhibit features and characteristics that would benefit from improvement, as mentioned in paragraph 11.7. However, we will not be adding car parks to the building audit as “negative contributors”, as the criteria set out in paragraph 8.15 requires negative contributors to be buildings. Parking space is a necessary provision within the town centre. This CAAMP invites enhancements through various recommendations (see section 13.14-17), which will be reviewed as part of this process.</p>

6.21 - This paragraph explains the history of the development of the Kennet Centre, and should identify that the building has a negative impact on the character and appearance of the conservation area.

Figure 4 - The plan of the town centre does not accurately reflect the presence of large commercial centres within the town centre, namely the Kennet Centre and Parkway and this should be changed accordingly. The plans is keyed as 'current types' and so should reflect the presence of larger later developments on the character of the conservation area.

7.4 - It is not accurate to characterise the whole of Bartholomew Street as having a typology of historic shops. There is extensive modern infill present on Bartholomew Street, including the frontages of the Kennet Centre, which does not reflect the historic plot pattern nor other characteristics of the historic sections of the street. The description of Bartholomew Street should be amended to reflect this later influence to ensure that the characterization of the street is accurate. This is illustrated in the photographs below [photographs supplied].

Similarly, the description of Northbrook Street should accurately reflect the extent of modern post war redevelopments.

7.8 - This section should reflect on the loss of historic plot patterns arising from the development of the conservation area. To fail to do so means that the hsiotirc development of a large area of the town centre to the south of the Kennet is not accurately reflected in the appraisal.

8.9 - It is inappropriate for a conservation area appraisal to set development management policies or guidelines and such issues should be considered in accordance with the development plan. This paragraph should be deleted.

Figure 58 -

The whole of the Kennet Centre should be shown as detracting from the conservation area. At the moment the plan only shows part of the Kennet Centre as a detracting feature, and this should be corrected. A site plan showing the full extent of the Kennet Centre is appended to this letter.

No. 17-19 Market Place is identified as a positive contributor to the conservation area. We do not agree with this

2. Paragraph 4.20 (Area 16 Addition)

Following a detailed boundary review with Historic England, The Newbury Society and Newbury Town Council, it has been agreed that the Post Office yard is worthy of inclusion within the CA as a part of the Post Office site and this part of the town's history and development. Its utilitarian character goes hand in hand with its historic development and use.

3. Paragraph 6.21 (Kennet Centre)

We will amend the building audit map to show the whole of the Kennet Centre as a negative contributor to the conservation area, as per the site boundary you have helpfully provided. We will reflect this in the wording of paragraph 6.21.

4. Figure 4 (landscape characterisation map)

To clarify, the yellow part of this map shows the historical extent of the settlement of Newbury as per previous archaeological studies of the area. This is not intended as a detailed morphological study showing later development within this area. We will review this map and the associated wording/key to make the map's purpose clearer.

5. Paragraph 7.4 (Bartholomew Street)

We do not agree with this comment – this paragraph does not characterise “the whole” of Bartholomew Street or Northbrook Street in this way.

6. Paragraph 7.8 (burgage plots)

Agreed - We can add a paragraph addressing the loss of historic plots through larger modern development schemes.

7. Paragraph 8.9 (loss of public amenity)

We are unsure how your comment applies to this paragraph. It is typical for CAAMP document to refer to local and national planning policy and guidance, as per this paragraph.

8. Building Audit

Agree regarding the Kennet Centre: we will amend the building audit map to show the whole of the Kennet Centre as a negative contributor to the conservation area, as per the site boundary you have helpfully provided.

assessment and consider that the building should be properly identified as no more than a neutral contributor.

The building dates from the 20th Century and is generally poorly detailed. The pilasters and entablature are the wrong proportions, corner detail to pilasters unresolved and not according to precedent, cornice and entablature wrong mouldings and unresolved, floors cross the windows, which are inappropriately proportioned. The windows are inappropriately detailed with no sills. This is illustrated in the photographs below [photographs supplied]

The run of buildings that are located south of 17-19 Market Place southwards to and including the modern entrance to the Kennet Centre should be identified as buildings which detract from the conservation area. These buildings are poorly detailed in modern brick with modern shop fronts at ground floor and windows that do not reflect the vernacular rhythm above. The roof form is expressed as a large single plain which similarly detracts. This detracting effect, which is wholly ignored in the CAA is shown in the photographs below [photographs supplied]

The Newbury Corn Exchange Car Park and Post Office yard (see above) should be identified as negative contributors to the conservation area.

Figure 60 - The legend is unclear and should be clarified.

9.16 - The CAA appraisal should make clear that all of the identified views are experienced in a kinetic fashion and that the illustrative imagery is representative of that experience at one point or another along the view route. None of the townscape views that are identified represent static viewing points and thus the assessment of the contribution that all of the views make to the significance and amenity of the conservation area should be in the context of movement along them.

For example, View 12, along the towpath, is an entirely arbitrarily selected position. While it is helpful for illustrating the amenity of the canal, there is no reason that this particular position has been selected over another further to the east or the west. To avoid undue primacy being accorded to one particular position, the CAA should be clear that these are representative views to illustrate the contribution that these particular kinetic experiences make to the conservation area.

Downgrading 17-19 Market Place to a neutral contributor: We do not agree, this building makes a clear positive contribution to the character and appearance of the area and is contextually appropriate.

Downgrading of neighbouring south of 17-19 Market Place to negative contributors: We do not agree. These buildings sit quietly and appropriately within the townscape context. A negative contribution is one that is actively detracting, which does not apply to these buildings.

Comments on Corn Exchange Car Park and Post Office yard have been covered in response to comments above.

9. Paragraph 9.16 (views)

Several views have already been identified as kinetic (including view 12 on the Tow Path). This is a still photograph and, therefore, a representative image. This is why multiple photographs are shown for a single viewpoint. As a kinetic view, it would be expected that the viewpoint could move as appropriate, as indicated by the arrows in the viewpoints map in Figure 60. We will review the views map and associated wording and we will update as appropriate to clarify this.

10. Figures 80-82 (view 16)

We will mention the Kennet Centre in these views, but please note that this is not an impact assessment, only a brief description.

11. Figures 85-86 (view 19)

This view has already been identified within the view type unfolding and kinetic. As per point 9 above, we will update the views map and associated wording to make this clearer.

12. Paragraph 11.3 (Modern Development)

We will add the Kennet Centre to this paragraph.

However, we do feel that the Kennet Centre has already been given due consideration as a detracting feature. Eg. Paragraph 11.4: "The demolition of small-scale buildings to accommodate multi-storey buildings has eroded the town's character in places, having a detrimental impact on the setting of nearby heritage assets. For example, the Kennet Centre, the West Berkshire Council offices, and the Debenhams development"

Figures 80-82 - These views should identify the other Kennet Centre buildings that detract from these representative views. The Kennet Centre is plainly a negative feature in this part of the town centre and this should be reflected in a description of the impact that the centre has on these views.

Figures 85-86 -

These views are part of an unfolding experience as one moves south along the street, crossing the canal and entering Bartholomew Street. This experience encompasses views 88-89 looking east and west along the canal, which forms part of the amenity of this sequence. The overall sequence takes in a number of heritage assets which draw the attention (such as St Nicholas Church and the Town Hall), but also affords views of the unattractive elements of the Kennet Centre (as illustrated in the photographs provided) This should be reflected in the description of these views.

11.3 - In describing modern elements that detract from the conservation area, there is a notable absence of analysis of the Kennet Centre which is the largest and most significant detracting feature in the conservation area. This should be reflected in this section headed 'Modern Development'.

Figure 115 - Please refer to the appended plan to ensure that the boundary of the Kennet Centre is drawn correctly.

12.25 - This fails to present an accurate assessment of the Market Place character area by not identifying the modern buildings on the west side of the market place that are associated with the Kennet Centre, and are of a detracting influence within the conservation area.

12.66 - The CAA needs to be clearer that the Kennet Centre is a negative feature within this character area.

12.67- 12.68 - Given the significance of the negative influence of the Kennet Centre on the townscape of this character area, these paragraphs are insufficient to describe the townscape and architectural quality. The paragraphs should be re-worded to avoid the implication that the street furniture somehow mitigates the severe impact that the Kennet Centre has on townscape character.

12.69 - The wording 'do not contribute positively to' should be changed to 'significantly detracts from'.

Chapter 13 –

13. Figure 115 - Noted

14. Paragraph 12.25

The modern buildings on Market Place are covered in 12.31 and figures 143 and 144. We do not believe these buildings to make a negative contribution, as set out on the Buildings Audit map.

15. Paragraph 12.66 - Noted

16. Paragraphs 12.67-68

These paragraphs have been reviewed and are considered to accurately portray the negative contribution of the Kennet Centre. We do not feel that acknowledgement of pedestrianisation and the street furniture as positive elements provides mitigation to the Kennet Centre, only that these are positive features in their own right.

17. Paragraph 12.69

We will review this wording and update as appropriate.

18. Chapter 13

To clarify, all the guidance in this section are design recommendations and not part of the local development plan. The guidance in this section would be a material planning consideration, but would not hold the same weight as the adopted planning policy. To make this clearer, we will review and update the wording throughout this chapter so that it reads clearly as design guidance and recommendations only (as opposed to adopted planning policies).

19. Pol 23 (opportunity areas)

The Kennet Centre has already been identified as an opportunity area: "The Kennet Centre and the Council Offices would benefit from reconsideration with sensitive redevelopment whilst maintaining the historic street pattern." The reference to street pattern remains relevant, as it refers to the retention of surviving streets. We will adjust the wording to clarify this.

We have major concerns around the wording within Chapter 13 setting out recommendations for the management of the conservation area, many of which are expressed as 'policies', indicated by the prefix 'POL'.

It is wholly inappropriate for Conservation Area Appraisals to set policy. Policy can only be expressed in a development plan which has been the subject of an examination in public following the appropriate plan preparation process. Such policies clearly need to be sound according to the tests of soundness set out within Paragraph 35 of the NPPF.

Clearly, an update to policy needs to take account of the full range of a planning authority's needs, including meeting the area's objectively assessed needs, based on the proper evidence base. 'Policies' contained within a CAA manifestly cannot achieve this and to do so would bypass proper process and consideration of the strategic objectives for the planning area.

This is recognised within Historic England Advice Note 1 (Conservation Area Appraisal, Designation and Management) (2019) which states, with reference to development plans (para 83):

*"Plans should set out a positive strategy for the conservation and enjoyment of the historic environment. For conservation areas this is likely to include overarching, strategic policies in Local Plans to ensure special attention is paid to the desirability of preserving or enhancing their character or appearance when making decisions affecting these areas. However, the NPPF's approach suggests more is expected as part of a 'positive strategy', likely to include specific, more detailed, policies for individual conservation areas, possibly alongside site allocation and/or design policies"*

Paragraph 84 of the guidance goes on to identify potential development management policies (i.e properly contained within a development plan) on:

- *identification and protection of important views and vistas;*
- *criteria for determining applications involving demolition and replacement of buildings;*
- *support for applications retaining key features and bringing them into their optimum viable use;*
- *criteria for determining applications involving alterations and extensions to historic buildings;*

- requirements to evaluate archaeological interest within conservation areas;
- an urban design strategy for securing good design quality in new development;
- *retail and other use class policies to protect uses that contribute to the character or historic or architectural interest of a conservation area; and*
- *site allocations within conservation areas to bring forward and guide beneficial development of gap sites or sites currently detracting from the area's character or appearance.*

Plainly the guidance anticipates that such matters are properly addressed within a development plan. This extends to design guidance of a general nature.

The policies contained within Chapter 13 of the CAA can therefore only be interpreted as recommendations to inform the formulation of development plan policies (to be assessed in the context of the objectives of a development plan as a whole) through the appropriate process. Such policies within the CAA have no status for decision making purposes and this should be made clear in the CAA that these are not policies but recommendations to be carried forward for assessment through the development plan process.

We are however very concerned with the specific wording of certain recommendations (which read as if they are policies) which are inconsistent with the approach set out in the NPPF.

The NPPF is predicated on identifying the significance of heritage assets, then establishing the impact of development on that significance. Where the impact is identified as a harmful one, the NPPF specifically allows for the planning benefits (of a whole range) to be balanced against that harm. The CAA is currently drafted to wholly bypass and prejudice that process. This is wholly inappropriate and the following references should be deleted from the CAA on the basis of a conflict with the NPPF.

- Pol5 purports to reproduce the guidance contained within the NPPF regarding the demolition of buildings within conservation areas, however it is simplified and therefore superfluous and liable to confuse as it does not refer to the staged approach to assessment set out in the NPPF. This should be deleted from the appraisal;

- Pol6 should be deleted as it does not provide an adequate framework for the assessment of new development. It is wholly inconsistent with the staged approach to assessment set out in the NPPF in that it is expressed in terms of inviolable principles; for example, *'New development should not interrupt the overall roofline in the key views set in Chapter 9'*. Aside from the problematic matter of setting policy within the CAA, such a 'policy' entirely bypasses the appropriate assessment of development proposals in accordance with the development plan as a whole (including, say, the application of paragraph 202 of the NPPF) and would be unlikely to be considered sound in a development plan context;
- The guidance in Pol6 is also imprecise. For example, it states that 'new development should not be excessively tall or dominant' - without defining the meaning of the terms, which in any event would be for assessment on a site by site basis on the facts of the case;
- Similar concerns arise with parts a-f of the 'policy' POL6, which is overly prescriptive and inappropriate guidance to be included within a CAA; and
- POL13 refers to certain views from outside the conservation area and states that development which would negatively affect these views 'will not be permitted'. This is wholly inconsistent with the NPPF and it is not the place of a CAA to set out binary policies in this fashion. This is an entirely unsound use of the CAA.

The above references are a matter of considerable concern as they sidestep due process for the revision of development plan policies and are inconsistent with the NPPF. The inclusion of such policies is therefore inappropriate and stakeholders are liable to be confused about the status of the document. Reliance on these policies for development management processes would be inappropriate due to the proper weight that could be accorded to the CAA.

#### POL23

The Kennet Centre should be identified as a key opportunity for the enhancement of the conservation area. This is the largest development site within the CA and one that is identified as a negative contributor. Plainly the Kennet Centre has a negative effect on multiple positions of the CA and

	<p>proactive development of the site should be expressed as a priority.</p> <p>The reference to maintaining the historic street pattern is superfluous as there is no historic street pattern remaining within the footprint of the Kennet Centre and this reference should be deleted.</p>	
Resident	<p>As a local resident for over 65 years I would like to know where the money is coming from for these changes, we are told here will be further increases to our already expensive council tax &amp; that WBC are short of money so why continue to spend money on vanity projects that can wait for a few years, is it important to the local community or is it someone's chance to put their name up in lights?</p> <p>It seems to me that you don't 'house-keep' your funds that are provided by the local community &amp; government very well.</p>	<p>This exercise is important and necessary, as no appraisal for this conservation area has previously been conducted. It is a statutory requirement for local planning authorities from time to time to review their conservation areas. Provision of a Conservation Area appraisal and management plan (CAAMP) is strongly recommended by Historic England and will be of great value to the future management of the conservation area by informing the assessment of future proposed development and thus the decision making process.</p>
Resident	<p>I would like to register disapproval for the proposed withdrawal of the conservation area protection for the terrace in West Street. I believe that the result would be that another part of Newbury's 18th century heritage could be lost - it will be made much easier for the area to be developed, and the terrace demolished. The value of the terrace to developers being that the footprint of the West st terrace is substantial and located in the centre of Newbury. I live in number 64 (built in 1795), and have invested a considerable amount into a two storey extension at the back, and much else to create a home for my retirement that is central to Newbury, and with enough space for my pictures and books.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>
Resident	<p>With reference to the published consultation draft of the Newbury Town Centre Conservation Area Appraisal and Management Plan, we would like to point out that the author</p>	<p>Noted - The document will be reviewed as part of this process</p>

has fundamentally misunderstood the relationship of Angel Court to the CA and misrepresented Westbourne Terrace in the descriptions at Paragraphs 12.51, 12.56, 12.59, 12.61 and Figure 174. This mistake is not however repeated in the table in the appendix at Section 16.

As you will be aware, Angel Court is not in the CA because it is a C.1980s cul-de-sac of largely social housing with no heritage or townscape merit. Westbourne Terrace on the other hand is a 19th century remnant of a wider Speenhamland street pattern that would have read coherently with Pelican Lane, and the former Eastbourne Terrace and Pelican Terrace.

At the appendix, Westbourne Terrace has been labelled as Medium priority for listing. The photo at Figure 174 shows what happens when WBC takes its eye off the ball with the inappropriate application of cladding to no.7 and the poor architectural quality of the front porch added to the Council owned no. 4.

It would be appreciated if subsequent applications for such works including dormers to the front elevations are given sufficient consideration against the objectives of the CA and its management plan.

Whilst understanding that this document is a draft, some aspects of the publication indicate a rushed approach such as the poor quality maps and figures and the incomplete header on each odd numbered page.

We found that paragraph 12.61 in particular was confusing (notwithstanding the incorrect reference to Angel Court) because it is not giving specific examples of brick walls with heritage interest such as that which separates the rear of Westbourne Terrace from the Police House.

A number of the conservation area maps are low quality and pixelated. The separate map showing areas to be added or subtracted is very poor and the legend to the character areas map has disintegrated.

<p>Newbury Society</p>	<p>Whilst the draft document appraising the town centre Conservation Area (CA) does some good analysis, its shortcoming far outweigh its positive benefits. I am very concerned about the overall document on a number of levels; the length of time it has taken for an appraisal to be undertaken, the quality of the study, the depth of the appraisal, the serious factual errors, and, one could say, the councils efforts to deter, or at least limit public input.</p> <p>The fifty or so conservation areas in West Berkshire were set up in the region of 50 years ago. In spite of years of public pressure on the Council to undertake the regular appraisals required by law, this is only the third in the district and the first for Newbury itself and by far the most important. Best practice says re-appraisals should be carried out every ten years. Much has been changed and lost in that time.</p> <p>Bodies such as the Newbury Society with their extensive continuity of local knowledge and wish to enhance the town offering their services and wanting to be involved in the public consultation with, have always been rebuffed by the council in favour of outside consultants.</p> <p>As a result of the above the report is full of errors, misunderstandings and omissions in a number of areas, amongst which are:</p> <ul style="list-style-type: none"> <li>- the development of the CAs over the years appears not to have been researched properly and is described erroneously.</li> <li>- there are serious errors in the understanding and depiction of the boundaries of the CA, most particularly in relation to the Kennet CAs, east and west.</li> <li>- The cover of the document gives the date of the report as December 2021, whereas it was presented to the public in January 2023.</li> <li>- Once published the public have been only allowed six weeks to respond to this 250 page document at the same time as the public were presented with the local plan, with the same time constraint. A request for an extension to the consultation period was summarily dismissed.</li> </ul> <p>Subtraction of areas from the CA:</p>	<p>Noted- The document will be reviewed as part of this process</p> <p>It would be disproportionate to conduct a full detailed assessment of all notable buildings in Newbury. Such a detailed assessment is not the function or purpose of a Conservation Area Appraisal, which is reserved for Heritage Statements. Please refer to General Approach Item No. 5 for more detail.</p> <p>All photography and surveys were undertaken as part of the 2021 document and it is not currently proposed to update this. As such, the document will remain a representation of the conservation area from 2021.</p> <p>Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p> <p>A conservation area is not designated on trees alone – Please refer to “General Approach” Item No. 4 for more detail. Should any trees of high amenity value fall outside of the proposed conservation area boundary, these will be assessed concurrently with the council's tree officers to assess whether those trees are of sufficient value to warrant a TPO. In such cases, TPOs will be designated concurrently with the updated conservation area boundary.</p>
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	<p>I have particular interest in the trees in the areas recommended to be removed from the CA, so losing their protected status. During a very recent webinar hosted by the Arboricultural Association on tree protection, the question of the inadequate protection of trees afforded by CA status was consistently expressed. In light of the council's declared climate emergency, to withdraw areas of existing trees from the protection of the CA would be a retrogressive step. (It might be said that these trees could then be protected by a Tree Preservation Order (TPO) is to misunderstand the situation. Very few trees in the CA warrant a TPO, and it is a costly process. It is the collective greenery and screening, which is at risk). The loss of key areas, for instance Oxford Road, opposite Waitrose and the Newtown Road, Derby Road area is highly detrimental to the green gateways to the town centre CA.</p> <p>I urge the council not to accept this appraisal as it stands. I urge them to make extensive and changes to this document (or start again) and involve interested, knowledgeable local people to enhance the study. (would certainly withhold payment until the consultants made amends). Please be very circumspect about withdrawing protection from the town's trees and be far more proactive and rigorous in applying tree protection to all existing trees.</p>	
Newbury Society	<p>We heartily welcome the production of this document, which is the first formal Appraisal of this Conservation Area since the first parts of it were designated more than 50 years ago, in 1971.</p> <p>The current public notice (NWN Jan. 12, 2023 p. 68) states that this conservation area was reviewed in 2010. However, we have been involved with Conservation Areas in an attempt to secure appraisals since well before 2010 and are unaware of any review for this conservation area, or any consultation (whether public, or simply with Newbury Town Council) or published material relating to it at that time or since. We are not aware of any related Public Notices (which would be required) from c.2010.</p>	<p>The information and corrections in this document are noted - The document will be reviewed as part of this process and updated as appropriate/relevant, in line with the agreed "General Approach".</p> <p>The Kennet and Avon Canal Conservation Areas (east and west) are already separate conservation areas and will remain so. Please note that some sites are proposed to be included within other neighbouring conservation areas, such as West Berkshire Museum and others. The boundaries for neighbouring CAs will be updated/adopted concurrently with NTC so that no areas of significance are left unprotected. Please refer to "General Approach" Item Nos. 1, 2 and 3 for more details, including the revised approach for each area. The level of protection afforded</p>

There are problems with some of the evidence-base for this appraisal. West Berkshire Council does not appear to have much of the supporting evidence produced to support the creation of this conservation area in its various stages, 1971-1990 (see section C, part 2 below), which does not appear to have ever been digitised. This includes some of the accompanying maps: we can see no evidence showing use of the map associated with the last major extension of this conservation area's boundaries, in 1990 (eight years before the creation of West Berkshire Council); this revision is not even mentioned in the Appraisal. There also appears to be no evidence of serious attempts by West Berkshire Council to acquire this material since the council's creation, in spite of its role as the responsible authority. The missing evidence could be highly relevant when considering subtractions from the conservation area.

We contest the Appraisal's portrayal of the existing boundaries to this conservation area, which are inaccurate; see the whole of section A, part of section B (after 17) and C2 below. We ask that West Berkshire Council provide clear supporting evidence and references for its interpretation of the existing boundaries.

We also feel that the Newbury town centre conservation area is too large to be easily manageable, and needs to be sub-divided into adjoining areas to make future Appraisals more practical. As a minimum, the area needs to be divided into two; but more areas would be preferable. As an example of the existing complexity, the area contains well over 150 listed buildings, including two at Grade I and 17 at Grade II\*, which are inadequately documented in the draft Appraisal (see C8 below).

#### **A. BOUNDARY INACCURACIES**

In considering the present submitted draft Appraisal, we would like to start by highlighting serious inaccuracies in the submission. There are several errors in the portrayal of the existing boundary of the Newbury Town Centre conservation area on the accompanying map.

to both canal conservation areas will remain the same. The council will coordinate the updated boundary of both canal conservation areas in parallel to the proposed updates to the Newbury Town Centre Conservation Area boundary.

There are no plans to split Newbury Town Centre Conservation Area into two separate areas. However, the CA has been divided into various character areas to assist with character analysis and management.

The proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.

This document intends to provide an overview of character, architectural and historic interest; it is not intended as a complete history of Newbury and it would be disproportionate to do so. The document will be reviewed to address any identified inaccuracies, but it is not possible at this stage to add substantial detail to the historic background sections of the report (e.g. Non-conformity). It is the role of individual heritage statements to research historic background relevant to the site/proposal.

Please note than any buildings and areas falling outside of the updated CA boundaries will not be subject to

1. K & A Canal Newbury Conservation Areas
2. Northcroft
3. Post Office, Cheap Street
4. The former Vyne or Vine inn, 61 Bartholomew St

**B. REVIEW OF PROPOSED BOUNDARY CHANGES (1-17 etc)**

1. SUBTRACT: Grass "verge" NE of Victoria Park.  
RECOMMENDATION: OBJECT.
2. SUBTRACT: [St Mary's Road area] north of Victoria Park  
RECOMMENDATION: OBJECT (BUT MIGHT ACCEPT SUBTRACTION OF PART OF THIS AREA).
3. ADD: Infant Schoolhouse, Speenhamland.  
RECOMMENDATION: SUPPORT
4. SUBTRACT: Area NE of Oxford Road [opposite Waitrose]  
RECOMMENDATION: STRONGLY OBJECT
5. ADD: Area west of the Broadway and Northbrook Street [N end]  
RECOMMENDATION: SUPPORT
6. SUBTRACT: Area west of Northbrook St [West Street etc]  
RECOMMENDATION: OBJECT.
7. SUBTRACT: Area west of Oddfellows Road and Bartholomew St.  
RECOMMENDATION: OBJECT
8. ADD: Area traversing the railway. RECOMMENDATION: WBC CHECK THE 1990 BOUNDARY SCHEDULE (THIS IS ALREADY IN THE CONSERVATION AREA, EXCEPT FOR THE SECTION OF RAILWAY, WHICH DOES NOT NEED TO BE INCLUDED).
9. SUBTRACT: Area south of the railway  
RECOMMENDATION: SUPPORT.
10. SUBTRACT: Area south of Derby Road and south of St John's roundabout. RECOMMENDATION: OBJECT
11. SUBTRACT and ADD: [Areas in] Link Road and Newtown Road (minor). RECOMMENDATION: OBJECT
12. SUBTRACT: Western part of St Nicolas' School playground (ERROR in description 4.15 p. 19; listed as Area south of Derby Road and south of St John's roundabout i.e. a repeat of the description for area 10).  
RECOMMENDATION: NO OBJECTION
13. SUBTRACT and ADD: Areas by Newbury station (minor).  
RECOMMENDATION: NO OBJECTION

detailed assessment, nor will they be included as part of the building Audit. The council's resources and budgeting are outside the scope and purpose of the CAAMP document.

14. SUBTRACT: Area north of the railway.  
RECOMMENDATION: OBJECT
15. SUBTRACT: Area to the west of the A339.  
RECOMMENDATION: OBJECT
16. ADD: Area around the Post Office. RECOMMENDATION:  
WBC CHECK THE 1990 SCHEDULE. THE OLD POST  
OFFICE IS ALREADY INSIDE THE CA. HOWEVER, WE  
WOULD SUPPORT ADDING THE ROYAL MAIL YARD  
(PARTICULARLY THE CHEAP STREET END,  
FOLLOWING THE BUILDING LINE) AND WOULD NOT  
OBJECT TO ADDING THIS STRETCH OF BEAR LANE.
17. SUBTRACT: Area to the south of the Wharf car park.  
RECOMMENDATION: OBJECT.

4.23. Heading should read "Kennet and Avon Canal  
(Newbury East)" not "Kennet and Avon Canal East."

4.24. Heading should read "Kennet and Avon Canal  
(Newbury West) [sic]" not "Kennet and Avon Canal East."

#### NEWTOWN ROAD CONSERVATION AREA

In principle, we support the creation of this separate and extended conservation area. Proposals for this were put to WBC in 2006 (sic) by a Newbury Town Council group led by councillor Gina Houghton, but no action was taken. We also favour breaking the rest of the Newbury town centre conservation area into at least two and preferably more conservation areas, in order to facilitate future Appraisals.

However, we do have concerns about the process involved. The existing Newtown Road area which is part of the Appraisal should not be removed from the Newbury town centre conservation area until an Appraisal has been completed for a new Newtown Road Conservation Area. Bearing in mind that West Berkshire Council currently has 51 conservation areas awaiting Appraisals, this seems unlikely to happen in the foreseeable future. Given the complexity of the current town centre Appraisal, and the limited opportunity for consultation, we think that an assessment of the appropriate boundaries for a new

Newtown Road conservation area should be left for consideration in a new area-specific Appraisal.

### **C. REVIEW OF CONTENT**

Index

9. View 21: "Argyle Street" should read "Argyle Road."

#### 1. Summary of Special Interest

The River Kennet Navigation (opened 1723) and the Kennet and Avon Canal (opened throughout in 1810) need to be mentioned in this section, as they make a contribution to the economy of Newbury leading to the creation of a number of high-status Georgian houses which survive in this conservation area, and contribute significantly to its character. The development of the town cannot be properly understood without consideration of the role of Newbury Wharf.

1.5 The date of foundation for St. Bartholomew's Hospital is not known. It was founded before 1215, when it was granted the right to hold a fair by King John.

Evidence indicates that Bartholomew Street was built up as far as the junction with Pound Street during the medieval period, so to say that St Bartholomew's Hospital was outside the town and did not become part of the town until the 18th century is misleading. A better description might be to describe it as "on the edge of the urban area."

#### 1.6 Key building typologies of interest

These should include breweries, and historic inns and pubs.

This section should also include notable buildings linked to local builders or architects of national and local significance. For example, 18th-century buildings linked (whether on the basis of evidence or not) with James Clarke, master builder; and 19th-century buildings designed by architect James H. Money.

## Materials

To describe the blue/silvered bricks as “occasionally seen” is to understate their importance. There are a number of examples in Northbrook Street, Bartholomew Street, Cheap Street, Mansion House Street, Wharf Street, West Mills, Broadway, London Road and Old Bath Road. These include some of the most high-status Georgian homes in the town.

## 2. Introduction

2.3 The draft states that the Newbury town centre conservation area was designated in 1971, and gives no indication of the progression of changes which lead to the present town centre conservation area, over nearly 20 years. Given the sparsity of publicly-available documentation, this progression is highly relevant in identifying the boundaries.

There are four stages, described below as stages a) to d).

a) Three distinct conservation areas were created in 1971, all within the town centre conservation area as it is now:

“Pound Street and Newtown Road” (including “The City”).

“Kennet and Avon Canal” (Newbury Bridge and much more, including West Mills, Newbury Lock, Market Place and the area of Newbury Wharf in front of the museum)

“Northbrook Street” (including the Broadway area)

Maps are available showing all of these, which should be reproduced in the Appraisal.

b & c) These areas were then extended b) in 1973 (to include parts of Northcroft Lane, West Street and Pembroke Road); and revised again c) in 1976 or 1977. By 1977 the areas focussed on Northbrook Street and the Canal had become fused into one town centre conservation area. In a 1980s reference stage c) is described as taking place in 1976; although the public notice was not published in the London Gazette until July 18, 1977.

A map showing the extent of the town centre conservation area before the addition of the 1983 K & A conservation areas appears at the back of the Newbury and Thatcham District Plan, Written Statement, published by Newbury District Council in 1981, with the title “Proposals Map.”

The two adjacent Kennet and Avon Canal conservation areas were added in 1983 to the existing Newbury town centre conservation area; these were K & A Canal (Newbury East) and K & A Canal (Newbury West), two of seven K & A conservation areas introduced in 1983 across West Berkshire. The town centre section of the canal (including Newbury Lock, Newbury Bridge and the stretch past the Waterside Centre) remained in the Newbury town centre conservation area. Parts of the boundaries of the town centre conservation area are indicated on the maps and in the schedules of the K & A Canal (Newbury East) and K & A Canal (Newbury West) Conservation Areas.

d) Much of the southern part of the town centre conservation area (including the Kennet Centre) and more was added in 1990 (The public notice was published in the Newbury Weekly News on Feb. 1, 1990 p. 28, featuring a Schedule with a detailed description of the boundary changes). This is when the "Pound Street and Newtown Road" area designated in 1971 (including "The City") ceased to be a conservation area in its own right and was absorbed into the Newbury town centre conservation area. The extensions in 1990 included Cheap Street and the rest of Bartholomew Street, and the southern part of Newbury Wharf (Area 17).

We are not aware of any approved changes in the boundaries of the Newbury town centre conservation area since 1990. If West Berkshire Council considers that further changes have been made, we would ask it to produce the associated public notices etc.

#### Documentation and Community Involvement

2.6 p. 9. The draft Appraisal states: "the Conservation Area Appraisal & Management Plan involved the following Consultation: Contact via letter to residents and business, Statutory and Non-Statutory Consultees and Stakeholders. An invitation to comment with Draft Documents available digitally and in hard copy. Responses made via survey form, or letter. A list of those contacted is available as an Appendix to this document."

The wording here is misleading. In spite of the "Final Issue" date given of December 2021 (sic), there was no general consultation until the draft was published online on the West

Berkshire Council website on January 12, 2023 (sic). There is no list of those contacted available as an Appendix to the document, even though it is included in the index as Appendix 2.

Hard copies of the draft Appraisal cannot be acquired or purchased by members of the public, although three hard copies have been made available for public inspection (as indicated in the public notice published in the Newbury Weekly News on January 12, 2023). We are not aware of letters to Newbury residents in general, even now. We are aware of a number of targeted letters, but have no information about the selection process or the numbers involved.

We do feel that community involvement prior to the launch of this 2023 consultation would have been of benefit to the draft, and would have helped to avoid serious errors such as those in the boundaries described. In spite of several requests to be involved, The Newbury Society (which is the Civic Society for Newbury and a non-statutory consultee) received nothing formal in terms of consultation and no opportunity to become involved until the day the draft was published online, i.e., January 12, 2023, hours after the formal consultation on the draft had opened. A West Berkshire Council email to members of its community panel, notifying them of the consultation, was sent out on Tuesday January 17, five days after the consultation period had started.

The consultation draft proposes the removal of several large areas from this conservation area: the St. Mary's Road area (Area 2); the West Street area (Area 6); and the Craven Road area (Area 7). Time is needed for a proper assessment of these, given that the information on why they were included in this conservation area is not in the public domain.

In these circumstances, on January 16, 2023 The Newbury Society submitted a request for the consultation period to be extended by six weeks (with copies to various interested parties, including Newbury Town Council and the West

Berkshire Heritage Forum). This was rejected by West Berkshire Council within hours.

In addition, West Berkshire Council started its consultation on the Local Plan Review just eight days after launching this Newbury conservation area consultation; which, for a small civic society such as ours, makes detailed consideration of this complex 249-page document even more challenging.

### 3. Planning Policy Context

Much of this section is general national policy or West Berkshire policy, with little specific to the town of Newbury or to this conservation area. None of the Core Strategy (2006-2026) or the Newbury Vision policies relating to this area are specified.

While we appreciate it is essential that this section is included, we do think that placing it later in the draft Appraisal (e.g. just before the Conservation Area Management Plan) would be helpful, as we consider that many people would be deterred from reading more at this point.

West Berkshire Council's Supplementary Planning Guidance on shopfront design ("Shopfronts and Signs, Supplementary Planning Guidance," 2003), draws themes and illustrations directly from this conservation area. It should be named and identified in this Appraisal as part of the Planning Policy Context for this Conservation Area, and applied consistently.

### 4. Boundary Review

See section B above.

### 5. Location, general character and landscape setting

"The Appraisal acknowledges that, other than Victoria Park, 'the town centre does not have extensive greenery,' but where it is found it makes a considerable difference (Figs. 31/32, 35, 51, 53, 55, 56.71)." John Handy 2023, 1.5. See the attached report by John Handy (tree advisor to The

Newbury Society): Observations on the Arboricultural Element of the Newbury Town Centre Conservation Area Appraisal, Feb. 2023; and in particular the “Additional Recommendations” (section 3).

5.1 See comments on boundary, section A, especially with reference to the boundaries with the K & A Canal conservation areas.

Toward end of this paragraph, should read Northcroft Lane, not “Northbrook Lane.”

5.7 The A339 connects the town with Oxford to the north, [ADD Winchester and Southampton to the south], and Basingstoke to the south-east.

5.8 “Brummell Grove” should read “Brummell Road.”

#### 6. Historic Development and Archaeology

6.2 This section or elsewhere needs to include a reference to the medieval common fields of Newbury: the East Field (between Bartholomew Street and Cheap Street, across both sides of the modern St John’s Road) and West Field (west of Bartholomew Street, and stretching out to the south of part of the Enborne Road).

6.3 p. 28, in reference to St. Bartholomew’s Hospital, states “...it is thought it may have been a leper hospital linked to the Benedictine abbeys of Abingdon or Reading,” giving a reference to VCH Berks vol. 2 (1907). However, the account of the hospital given in this volume pp. 95-97 does not contain any such description, although there is a reference on p. 97 to the Hospital of St Mary Magdalene, Newbury, which was a leper hospital for women.

The Hospital’s medieval role as a hospital in the modern sense is confirmed and detailed by the Oxford Archaeology excavations (referred to under “Archaeology”, 6.25 p. 43).

6.5 Trade, 13th-16th Century. This should be headed "Trade and Industry."

Cloth production had always taken place in Newbury, but expanded through the 15th century, becoming nationally-significant in the 16th, with a recognised place in national exports. In the 15th century the major link was with Southampton, but in the 16th century this was surpassed by London, and (for example) there is very good evidence of clothier John Winchcombe II's London connections.

6.7. (Civil War) The wording here could be misleading. Although most of the fighting took place outside the built-up area of Newbury, the urban areas were closely associated with both battles. On both occasions King Charles I stayed in Newbury; the town was occupied by the royalists on the night before the First Battle in 1643; and the part of the town north of Newbury Bridge occupied by the royalists for several days leading up to the Second Battle in 1644, with guards placed on the bridge.

6.7 (Almshouses)

The first St. Bartholomew's Hospital Almshouses (just 4) were built in the mid-16th century. These were then rebuilt and expanded in 1618, and rebuilt again in 1698, as stated.

The original Pearce's Almshouses were in West Mills, and stayed there until the 1880s (The building survives, inside the town centre conservation area).

The original Coxedd's almshouses were founded in West Mills in 1690, and stayed there until the 1880s (The building survives, inside the conservation area).

The original Hunt's almshouses were founded in West Mills in 1729, rebuilt in 1817, and stayed there until the 1950s (The 1817 building survives, inside the conservation area).

Childs' Almshouses were established in 1824, not 1821.

Church Almshouses existed on the south side of St. Nicolas Church in the 17th century (the building later demolished); and the Almshouses moved to other locations before merging with Childs' Almshouses to create the Church and Childs' Almshouses in Newtown Road in 1879.

6.8 [Non-Conformity]

“Another characteristic of Newbury in the post-medieval period was its flourishing Non-Conformism, leading to the construction of several chapels, some with associated burial grounds.” It should also be said that Non-conformity flourished early in Newbury, with strong support in the 17th century. Much could be added to this section.

#### 6.10 (Transport)

The significance of Newbury Wharf needs to be included here, with a large 18th-century basin in front of (what is now) West Berkshire Museum, and a narrower 19th-century basin stretching across Area 17. Newbury Wharf had considerable economic significance, as Newbury became an inland port servicing not just its immediate surroundings, but areas into Wiltshire as well. In the 18th century the Kennet Navigation was increased in width to take the substantial “Newbury barges.”

#### 6.17

In referring to pasture, this needs to include Northcroft to the west of the urban area as well as The Marsh to the east.

#### MAPS

The John Willis map of 1768 (Fig. 5 p. 36) is an important map, but here is taken from a poor-quality reproduction. This is “A Plan of the Town of Newbury and Speenhamland,” which forms part of “A Map of the Country Ten Miles Round Newbury in Berkshire.”

For the maps, it would be useful to add either the R. K. Dawson boundary map of 1837 or the Cornelius Davis map of 1849, or both.

6.24 p. 42 (Roman Archaeology) seriously understates the importance of Roman finds in Newbury. The Newbury Goods Yard Cemetery uncovered in the 19th century contained an estimated 200 burials, with the number of about 100 inhumations supported by contemporary evidence, and a less robust matching figure for cremations [David Peacock Newbury Roman Cemetery, Countryside Books, Newbury

2018]. This suggests a settlement of some size, and was not necessarily the complete extent of the cemetery. Therefore, to say categorically “Newbury was not a town during the Roman period...” is misleading.

The cemetery was not south of Newbury, but immediately to the east of the town centre, on the present Sainsbury’s site.

There remain serious questions about the route of the main Roman road (Silchester to Gloucester) as it passes Newbury, which has implications for the location of future Roman finds. Whether or not the Sainsbury’s Roman Cemetery was alongside the major Roman road, it is likely to have been alongside a Roman road, which has implications for the town centre conservation area and particularly the adjacent area.

Other finds in the Enborne Road area, both within Newbury (although not in the town centre) and nearby in Enborne are also significant. Roman coins and pottery have been found in many parts of Newbury, not just near the Market Place.

6.25 (Tudor Archaeology) More archaeology in relation to cloth-production in Newbury would provide valuable information, particularly on its nationally-significant status in the 16th century. The potential sites include the area below and around nos. 22 to 24 Northbrook Street, which include the current Marks & Spencer building. Recent work on the sites on various closed department stores around the country has shown strong potential for good archaeology.

Some of the industrial activity at the rear of premises on the west side of the Market Place (and elsewhere) is likely to be associated with the dyeing of cloth, which is well-documented as a Newbury industry, particularly in the Tudor period.

## 7. Spaces, layout and street pattern

Figure 15 shows on the left the entrance to the former Eight Bells yard and on the right (brick and stone) the entrance to

the former Trafalgar Place (13 houses, one outside w-c to each two houses, now demolished).

7.9 Needs to mention Northcroft as well as Victoria Park. Much of it may be outside the town centre conservation area but part of it is inside. Historically and at present it is of considerable importance in relation to the town centre.

7.27 Another significant exception is the horse-chestnut tree in Mayor's Lane, near the Friends' Meeting House.

#### 8. Building audit

Bearing in mind that this is the first building audit taken of this conservation area, and that it contains over 150 listed buildings, this building audit needs to be comprehensive. It is not; it is woefully inadequate.

Section 8.1. refers to The Newbury town centre Conservation Area and then states "Within the Conservation Area there are a total of 154 listed buildings. Of these, 138 are listed at Grade II, 15 buildings are listed at Grade II\* and 1 building is listed at Grade I." This may or may not be true within the area demarcated as the town centre conservation area on the accompanying map, but the sentence uses the present tense and does not accurately quantify the number of listed buildings within the current conservation area boundaries. These include two Grade I listed buildings and 17 Grade II\* listed buildings, and the number of Grade II listed buildings significantly exceeds 138. The Grade I and Grade II\* buildings are:

Grade I

St Nicolas Church in Bartholomew Street.

Wharf Street Cloth Hall

Grade II\*

1. 1-27 Argyle Road, St Bartholomew's Hospital.
2. Bartholomew St, gateways to St Nicolas' Church
3. 28 Bartholomew Street
4. 2 Old Bath Road, The Chestnuts
5. Bridge Street, Newbury Bridge
6. 63 Cheap Street

7. 40 London Road, St Mary's House
8. Newtown Road, Litten Chapel
9. 10-11 Northbrook Street (Camp Hopson 1663 building, now listed as one of two listed buildings both numbered wrongly as 7-11; the other is no. 8-9, listed Grade II).
10. 24 Northbrook St, Jack of Newbury's House.
11. 42 Northbrook St, Specsavers
12. Northbrook Street, Methodist Church
13. 91-92 Northbrook Street
14. 22 Oxford Road, Wessex House (formerly The Shrubbery)
15. 3 West Mills, St Nicolas' House
16. 5 Wharf Street
17. Newbury Wharf Corn Stores/ Granary (West Berkshire Museum)

Section 8.2 then refers to positive and negative contributors, which here are set out by map only, with details of unlisted buildings in Appendix I. There they are grouped by location, with "priority for local listing" marked against them. There is no attempt to document listed buildings or even single out listed buildings of major historic or architectural importance. In particular, this Appraisal should highlight a) Newbury's pre-1700 buildings; and b) buildings of high architectural value from the 18th century, such as those associated with (whether on the basis of evidence or not) James Clarke of Newbury. As an alternative to b), this Appraisal might wish to use a list of the conservation area's Grade I and Grade II\* listed buildings for the same purpose.

Historic England advises that an Appraisal might "include a photographic survey of all buildings being included at the time of designation." [Designating and Managing a Conservation Area, Historic England]. While such an approach might be too comprehensive for West Berkshire Council, this Appraisal should contain photographs of all nationally-listed buildings, all locally-listed buildings, and (at least) those buildings triple-ticked with priority for local listing. In the absence of any previous Appraisal, this Appraisal forms the base from which future change in the conservation area will be documented. If

necessary, this information could be relegated to an Appendix, but it is essential that it is included.

For references to individual unlisted buildings see Appendix I below (16).

The sheer scale of the task of documenting all the heritage assets/ significant buildings across this conservation area is another argument for dividing the town centre area into two or more conservation areas.

#### 9. Setting and views

9.8 The Kennet and Avon Canal and adjacent land is an integral part of the town centre conservation area, as made clear in A and C2 above.

West Mills (the street), in spite of Grenville Astill 1978, was part of the medieval area of the town, shown clearly by the history of both Town Mills and West Mills (the mills), and the 15th-century date of the building which later became Pearce's almshouses (17-18 West Mills).

9.9 Mature larger-species tree planting and landscaping in the Wharf Road car parks could made a significant different to the appearance of this area, and views both from the town centre and the A339.

9.11 We strongly agree that views towards the tower of St Nicolas' Church and the tower of Newbury Town hall should be protected.

9.7 The view of the clock tower of St. Nicolas' church is within the Newbury town centre conservation area.

9.7 "Argyle Street" should read "Argyle Road." We agree that this view "takes-in some of the least-spoiled historic town landscape..."

Fig. 87 is inside the town centre conservation area, not outside (see A and C2 above).

9.18 We agree that Cromwell Place is an “opportunity for improvement,” and have concerns about the fate of the former URC Hall.

Fig. 75. This is inside the town centre conservation area, not outside.

Fig. 76. This is inside the town centre conservation area, not outside.

Fig. 79. This is inside the town centre conservation area, not outside.

9.17. Looking from West Mills towards the tower of St Nicolas Church is entirely within the town centre conservation area.

Fig. 87 This view is from inside the town centre conservation area, not from outside.

Fig. 89. This view is entirely within the town centre conservation area, not looking out. The whole stretch of the K & A Canal shown is entirely within the Newbury town centre conservation area.

Fig. 98 Marsh Lane, as shown, should remain an open view, showing the deep plot pattern and giving public access to the historic fabric along the side of 24 Northbrook St (“Jack of Newbury’s House”).

#### 10. Ambience

Part of the ambience of this conservation area relates to Newbury’s historic evolution as a rural market town, with markets both for arable crops (with its importance reflected in the Corn Exchange) and cattle (with a long-standing cattle market, with dedicated facilities off Market Street for about a century).

Another key element of its ambience relates to the prosperity of sections of the community following the opening of the Kennet Navigation in 1723, which is reflected in some fine 18th-century buildings which should be recognised, not least for the contribution they make to the present street scene.

Open spaces are also highly significant: including the green spaces of Victoria Park (reduced in size several times over the past century) and Northcroft; and the public realm offered by areas such as the Market Place and by Newbury Wharf, even in its neglected areas.

Some of these positive qualities were summarised in a Newbury Society leaflet in 1991:

“ - the market-town atmosphere, with a thriving town centre interspersed with architectural gems;  
- the rich history expressed in so many of its buildings;  
- the waterways heritage and the unique canal and River Kennet landscape;  
- the green spaces near the town centre.”

Buildings associated with local builders and architects such as James Clarke (builder, 18th-century), James H. Money (architect, mainly 19th-century) and A. J. Campbell Cooper (architect, 20th century) deserve particular recognition.

#### 11. Assessment of condition

The Georgian Group's report on Newbury states that “...the two primary threats to Newbury's historic character are the erosion of architectural detail and unsympathetic or unimaginative new development.” Georgian Group 1990 p. 25.

11.2 (Sense of arrival). We agree that the “quality of the gateways to Newbury fail to provide strong sense of identity for the town,” and feel strongly that “This is exacerbated by some prominent examples of poor-quality, recent and later 20th-century redevelopment (such as the Telephone Exchange), which compromise views into and out of the conservation area...”

Fig. 103. Note that part of the brick-built former Telephone Exchange nestles in the angle of its over-sized successor.

11.3 We agree that many recent developments "...can appear oversized and lack a sense of responsive articulation and materiality that would have helped them to relate better to the surrounding historic environment..."

11.6 (Alterations and extensions). We agree that a range of alterations and extensions "...erode the historic character and appearance of the Conservation area..." The roof extensions next to the listed building at 28 Bartholomew Street provide one obvious example.

11.9 West Berkshire Council has entirely satisfactory Supplementary Planning Guidance on shopfront design ("Shopfronts and Signs, Supplementary Planning Guidance," 2003), which has been haphazardly implemented. If this were better applied, it would lead to more sympathetic shopfronts in the conservation area. It should be named and identified in this Appraisal as part of the Planning Policy Context for this Conservation Area.

11.10 "Derby Street" should read "Derby Road."

Fig. 112. "Derby Street" should read "Derby Road."

## 12. Character areas and zones

Fig. 138 The view of St. Nicolas church tower is looking east, not west.

Fig. 146. The Wilko (former Woolworths) building was built 1959-60 (not early 20th century).

12.40 "Albert Street" should read "Albert Road."

Fig. 157. 12 Northbrook is a 18th century frontage. It has not been re-faced; it has been re-pointed.

Fig. 186. The panels do not represent buildings along the Kennet. They represent Bath (not on the Kennet), Salisbury (not on the Kennet), Newbury, Oxford (not on the Kennet), Reading and London (not on the Kennet).

Fig. 188. "Manor's Lane" should read "Mayor's Lane."

12.72 We agree that the steeped-up roof of Southbrook House is an unattractive feature in the conservation area, and detracts from the setting of the listed building at no. 28.

Fig. 195. We agree that the stepped-up roof of Southbrook House is an unattractive feature in the conservation area, and detracts from the setting of the listed building at no. 28.

Building heights as listed in Chapter 12 (relates to 13.10):

1. Victoria Park and Park Terrace – 2 storeys (p. 133)
2. Park Way – 2 & 3 storey (p. 139) (No height given for Parkway itself)
3. Market Place – 3 storey plus occasional attic (p. 151)
4. Northbrook Street – 2 or 3 storeys (p. 164)
5. Speenhamland – 1 to 4 storeys (p. 179)
6. Kennet Centre – 5 storeys maximum building height (Weavers Yard) (p. 195)
7. Bartholomew Street – 2 or 3 storeys (p. 208)
8. St Bartholomew's and The City – 3 storeys (The Litten) (p. 223)

### 13. Conservation [Area] Management Plan

If West Berkshire Council is unwilling at this time to accept our proposal that this Conservation Area should be subdivided, then in order to make it more manageable for future Appraisals, we would like to see the creation of several "zones" within the one conservation area, to assist in future subdivision.

13.2 REC1 We do not accept the draft Appraisal's interpretation of the existing boundaries of the conservation area, which has serious implications (for example, removing

the Newbury Lock area from any conservation area protections).

We contest many of the boundary changes proposed in the draft Appraisal (see section B above).

13.3 REC2 The part of the proposed Newtown Road Conservation Area which lies within the Newbury town centre conservation area should not be removed from the latter until an Appraisal of the proposed Newtown Road Conservation Area has been completed (to ensure a continuity of protection).

13.4 REC3. Bearing in mind that this is the first formal Appraisal of this area in more than 50 years, and that there are 51 outstanding Conservation Area Appraisals across West Berkshire, this recommendation needs to include requirements in terms of staffing to ensure that the review of Appraisals even every 20 years becomes a realistic possibility.

13.5 POL1 We support the proposed improvements to wayfinding (a); lighting (b), pavement surface (c), public telephones (d), electrical and mechanical plant (e), boundary treatments (f) and handrails etc (g).

13.6 POL2, 13.7 POL3 and 13.8 POL4

These sections outline general rules for planning applications in conservation areas, such as the use of traditional materials, which we support.

13.6 a) "complimentary" should read "complementary."

13.6 c) We strongly support the statement "Historic traditional roofscapes should be retained, especially where they are publicly visible..." Local clay tiles, for example, give a distinctive appearance to many roofs in the conservation area.

Design of New Development

### 13.9 Rules for demolition

#### 13.10 New development schemes.

a) We strongly agree that “The height, mass and bulk must be carefully considered to avoid impact on key views and loss of character...”

b) We agree that “Building heights for each character area should respect the established building heights in the immediate area, as set out in Chapter 12...” although it would be helpful to have some clarity about the meaning of “respect” in this context. The building heights given are from one to five storeys (see above, section 12), but generally two to three storeys.

We agree that “New development should not be excessively tall or dominant...” However, we think that it should be specifically stated in this section that (given its unique effect) the height of the Telephone Exchange should not be accepted as a material factor in allowing increased heights in its vicinity.

We view the guidelines in this section as positive in terms of future development in the conservation area.

13.11 REC4. We support this recommendation for new archaeological priority areas.

#### Shopfronts

West Berkshire Council has a very sensible shopfront policy which uses specific examples from inside this conservation area, and it should be named in this document, and used as guidance. It is “Shopfronts and Signs, Supplementary Planning Guidance,” 2003. We do not understand why it has been omitted.

#### Traffic and Parking

13.4. POL9 In general we agree with the “creative re-use or aesthetic enhancement of current urban voids...”, but we believe that (in the short and medium term) significant surface car parking should be retained within the town centre to help support local shops and services, and that this should be enhanced with “planting, soft landscaping and screening” where possible (to include larger-species trees where practical), as with new parking areas.

13.17 POL12 We echo the concerns about the clutter of road signage (and street furniture), and feel that more consideration needs to be given to the location of these, particularly to avoid harm to the settings of listed buildings.

Development within the setting of the Conservation Area

13.19 POL14 All new development “...must be aware of the potential impact of tall building [sic] may have of the setting of [sic] the conservation area...” Apart from re-working the grammar of this sentence, “must be aware of...” is far too weak in a planning context.

Landscape and trees

See attached report by John Handy (tree advisor to The Newbury Society): Observations on the Arboricultural Element of the Newbury Town Centre Conservation Area Appraisal, Feb. 2023.

Protection of Economic Vitality

13.27 POL19. We consider that proposals to change the use of a shop in the town centre conservation area from commercial to residential should require a planning application, whether a listed building or not. The list of potential candidates for local listing makes it clear that there are many high-quality unlisted buildings in this area, and that planning applications should be required, in spite of national rules on permissive development. Only with planning applications is there an adequate opportunity to consult with

the local community. If necessary, an Article 4 direction should be introduced to ensure this.

#### Specific Opportunity Areas

13.28 POL20. We agree that improvements to the Bartholomew Street bridge over the railway (known as “Black Boys Bridge”, after the adjacent former pub) would be desirable.

13.29 POL21. If Area 17 is retained in the Conservation Area, this recommendation should be extended to include the car park there (adjacent to KFC).

13.30 POL22. We agree that there are improvements possible in the Speenhamland area; however, we would like to consider specific proposals in their own right.

13.31 POL23. We agree that much of the Kennet Centre would benefit from redevelopment, and agree that “sensitive redevelopment” is exactly what is required. We also consider that the Council Offices are architecturally poor.

13.32 POL24. (Bear Lane entrance to Newbury) This has partly been overtaken by events. There is now no vehicular entry to the town centre from the A339 along Bear Lane. However, this part of the conservation area could be improved by planting and better landscape management of the areas to the north and south of the east end of Bear Lane, Areas 15 and 17 in the boundary review, both owned by West Berkshire Council.

13.33 POL25. (Railway Station area) We agree, and consider that the Grainger/ Market Street/ “urban village” development has been a missed opportunity, even though improvements to the public realm were promised as an integral part of the redevelopment, especially on the north side of the railway station.

13.34 POL26. We would like to see this slightly reworded, to avoid any perception of carte blanche pre-approval. “Some

plots at the rear of buildings along Northbrook Street and the Broadway may present opportunities for improvement and sensitive redevelopment.”

13.35 POL27. (Victoria Park/ Park Way interface) We have concerns about the potential implications of this, and would like some reassurances. Victoria Park is an enormous asset to the town, a vital green space which is highly significant to the conservation area, and should be protected. It has been periodically reduced in size over the past century, and the process continues. Land was taken from Victoria Park to create Park Way (the road, with surface parking spaces along both sides and in the middle), to service Newbury’s shops and business community; This was effectively lost into the Parkway (shopping centre) development. Other pieces of the Park have been taken for the A339 (then the A34), for the site of the nursery school, for the realignment of the approach to the “emergency” bridge, and for the widening of the A339 to create a new entry to the LRIE/ Faraday Road area.

#### 14. Contact Details

It should be noted that the draft Appraisal has been produced by consultants, and not by West Berkshire Council’s in-house conservation team, which (in spite of the area’s 51 outstanding Appraisals, all for areas which have never received an Appraisal, even though they are mainly 1970s and 1980s creations) was significantly reduced in manpower last year (2022). This has implications for the timescale in producing future Appraisals; for local specialised input into future Appraisals; and for the periodic review of Appraisals.

#### 15. References

The list of books is poor, and (bearing in mind the size and complexity of the Conservation Area, and that this is the first time this area has received a formal Appraisal) needs to be more comprehensive. Where, for example, are: Georgian Group Town Report 1; Newbury Berkshire, Georgian Group, London 1990.

Sue Hopson Newbury: A Photographic Record 1850-1935, Countryside Books, Newbury 1983.  
Walter Money Popular History of Newbury, 1905.  
[“Pevsner”] Geoffrey Tyack, Simon Bradley and Nikolaus Pevsner Berkshire (in the “Buildings of England” series), Yale University Press, New Haven and London 2010.  
R. B. Tubb Newbury Road by Road, Thatcham, 2011.  
Newbury Buildings Past & Present, Borough Museum, Newbury 1973.  
And more.

## 16. Appendices

### Appendix I

General Comment: On the whole this is a good list, with buildings given serious individual consideration. We don't understand why the buildings are in the order they are, making it more difficult to navigate. Only non-listed buildings are included; as stated earlier (section 8), we do think that this Appraisal should also document the listed buildings, and highlight some of the outstanding examples.

#### Positive Contributors:

64 Northbrook Street was extensively altered for Metro Bank. The Victorian panel from the former Joseph Hopson store faces into West Street.

101 Northbrook Street is a completely 1980s structure (the Anchor was completely demolished).

91 Bartholomew Street, Nags Head (or “Nag’s”; but not “Naggs”). Although the frontage is Victorian, there are 18th-century references to the pub under this name. The bars have been knocked into one, but besides that the building is largely unchanged since the 19th-century.

79 Bartholomew St (Cloth & Scissors, former Empsons), has an entry in Newbury Buildings Past & Present 1973.

44 Cheap Street. This building (Downer) is a building designed by James H. Money (1880), and deserves to be nationally listed.

8 London Road, the Cross Keys. On the site of a significant London-Bath Road coaching inn, which Walter Money's Popular History of Newbury (1905) says has "recently been pulled down and rebuilt."

"Newton Road, 37-41" should read "Newtown Road."

20-21 Northbrook Street were built 1867-8. The first occupants previously occupied premises in front of the (Wesleyan) Methodist church on the other side of Northbrook Street, which were then demolished to open up the view of the church.

Northcroft Lane, Salvation Army Hall. By Newbury architect Walter Henry Bell, foundation stone laid 1893. Exceptional frontage. Merits national listing.

Pelican Lane, "Old Police House" should read "Old Police Station." From a time in the 19th-century when Newbury had two police stations, one for the Borough and the other (the Berkshire Constabulary) for the rural police. Continued in use after the Borough police were absorbed into the Berkshire Constabulary.

47 the Broadway. There is no 47 the Broadway. The shop designed by James H. Money is at 47 Northbrook Street (Dogs Trust, corner of Park St), built 1882-83 for Alphonse Cary's music warehouse.

The former St. John's Vicarage (Victorian, by Butterfield; Abbeyfield/ Herbert Potter House) in St John's Road should also be included. This was nationally listed, but the listing was confused with the listing of 212 Newtown Road, and it was removed from the list.

Negative contributors:

	<p>Boots (4-5 Northbrook St) in particular stands out as a negative contributor, close to Newbury Bridge and in a sensitive area with several good buildings, at the heart of the town. Built 1979-80. Very poor, and in a key location.</p> <p>The current Jobcentre in Oxford Street is another negative contributor, partly because of the type of bricks used.</p> <p>Broadway House (Broadway) also has a very bland frontage, without merit, near the Clock Tower and the former Bath Road.</p> <p>This section does not include the Telephone Exchange, which is outside the conservation area but should be included because of its proximity and because has a such a significant negative effect upon the ambience of the conservation area; particularly on Bear Lane and part of Cheap Street; on the whole Newbury Wharf area; and on King's Road West. The building (which opened in 1974) was in practice approved by the GPO itself, and was accepted largely because of the technological improvement associated with Standard Telephone Dialling (STD). However, with subsequent changes in technology, large parts of the existing building are effectively redundant, and its scale and mass should not provide a precedent for any building which replaces it; or for any development nearby. Part of the previous Telephone Exchange still stands enfolded in the 1960s/70s structure, and is a more interesting building.</p> <p>Appendix II</p> <p>Contents completely absent. This reflects the lack of consultation with the community (including Newbury Town Council and The Newbury Society) prior to the online consultation launched on January 12, 2023, even though the draft Appraisal is dated December 2021 (sic).</p>	
Newbury Society	<p>Introduction.</p> <p>1.1 The positive effects of trees and greenery on urban situations are well documented: they are visually attractive,</p>	<p>A conservation area is not designated on trees alone – Please refer to “General Approach” Item No. 4 for more detail. Should any trees of high amenity value fall outside</p>

can screen unsightly views, soften hard angular architecture, dampen wind speeds, give shade, baffle traffic noise, give sense of well-being, provide habitat and bio-diversity in an otherwise sterile environment etc. In this Conservation Area Appraisal little consideration has been given to the benefits of trees and greenery, other than visual. The following notes are similarly restricted and I have also used examples of trees outside the CA, to illustrate a few points.

1.2 Within a Conservation Area, trees with a stem diameter greater than 75mm (at 1.5m above ground level) are protected by provisions in Section 211 of the Town and Country Planning Act 1990. The provisions require someone wanting to carry out tree work or felling of a tree in the Conservation Area (CA) to give a notice of intent (a Section 211 Notice) to the local planning authority six weeks before it is intended to carry out the work. The provisions also protect against damage (accidental or otherwise), including the root system. The six week period gives the authority an opportunity to cover the tree with a Tree Preservation Order. Outside a CA, with very few exceptions, a tree not carrying a TPO may have done to it whatever the owner wishes.

1.3 In considering trees it must be understood that in ideal conditions their roots will extend at least twice the radius of the branch spread, 90% of which will be no more than 2ft below the surface. Clearly, roots can be severely damaged by digging within the root zone, particularly linear excavations, but also indirectly, severely damaged by soil compaction, water-logging, dumping etc. In urban situations rooting areas are inevitably restricted so, are disproportionately vulnerable to damage, all of which will have implications on the tree's health, longevity and safety. Such damage may take many years to manifest itself, but this whole exercise is conservation of the long-term and trees should be there for the long term.

1.4 The Appraisal has nothing to say on the standards of arboricultural work and general care of trees in the Conservation Area. Retaining trees within the CA gives the opportunity for the LPA to protect them, not only from felling and inappropriate tree work, but also from the insidious, minor, but long-lasting damage that generally goes unchecked e.g. preventing the storing of road digging

of the proposed conservation area boundary, these will be assessed concurrently with the council's tree officers to assess whether those trees are of sufficient value to warrant a TPO. In such cases, TPOs will be designated concurrently with the updated conservation area boundary.

equipment and materials beneath trees. The quality of tree work is not audited and it is often poor (and sometimes shocking) also causes long term damage to a tree. The tree officer may only be in the post for a few years, but his vigilance and decision making can have a long-lasting impact on the town's trees.

1.5 The Appraisal acknowledges that, other than Victoria Park, 'the town centre does not have extensive greenery', but where it is found it makes a considerable difference, (Figs. 31/32, 35, 51, 53, 55, 56, 71.). The report makes the point that the town has few 'landmark' trees but cites the plane tree in Feltre Place benefitting the approach to the town from the south (7.26). (This site is a good example of preserving and enhancing a significant tree. Removal of the old Christian Science Reading Room only a few feet away, and re-siting the new buildings well away from the tree it has created a beneficial, modern addition to the CA). Where there has been significant tree planting, such as Northbrook Street and the Market Place, the semi-mature trees have yet to have a major impact. In other words, more trees and greenery and within CAs and approaches to the town would be beneficial.

1.6 The Appraisal makes notes and recommendations on building detail but, except in the most general terms, (13.21 POL 16 & 18), the report does little to inform policy on tree establishment. There is some general advice on tree planting but planting a tree is one thing; getting it to survive, grow and thrive is a far more difficult proposition. But, tree planting is often unpopular. Trees take up space, light, shed leaves and need maintaining etc. For the greater good, tree and shrub planting with careful consideration of what type and where, should be insisted on by the council, particularly in light of their 'environmental emergency'/green campaign.

1.6.1 Where trees are removed from within the CA they should be replaced with a maintenance clause.

1.6.2 Instead of landscaping (tree and shrub planting) it should be a major consideration in giving planning consent e.g. 31 Bartholomew Street (opposite the end of Market Street) where there was a sizeable open area and garden at the front but is now the site of an unimaginative modern block.

1.6.3 Allow far more space to existing trees and shrubs:

A In Area 1 there was a row of about five or six mature beech, with considerable safe life expectancy, until that is, Charlton Place roadway was constructed within a few metres of the trees. This inevitably caused massive root and soil damage leading to decay making the trees unsafe, to the extent that they all had to be removed ten to fifteen years ago. The stumps are still there).

B Very recently, the plane tree in early maturity with many years of growth to be expected on the corner of Mayor's Lane and Market Street is under threat. The new Market Street development building has been allowed a few metres away from this tree and it has already had to be pruned back. No doubt it will end up being pollarded for the rest of its life rather than being allowed to grow like the one in Feltre Place.

## 2 Subtractions and additions

2.1 The areas proposed for subtraction are at the fringes of the Town Centre CA and contain a higher-than-average proportion of the CA's trees. As such this greenery serves as a screen and demarcation of the CA, enhancing the different feel of being in a more special area of the town. Trees are able to partially separate the Conservation Area from the harsh reality of modern buildings and traffic e.g. the few trees seen at the southern end of Cheap Street. By excluding these small areas of trees from the CA, the legal protection falls away, leaving the planning authority with a reduced ability to protect them from being 'developed', let alone being able to prevent minor, incidental damage. Most trees may not be 'worthy' of a TPO but they still have an important contribution to make to the street-scene and the townscape.

2.2 Area 1 The narrow strip of parkland northwards of Victoria Park and verge south, to the Kennet West Conservation Area.

Although there are no buildings in this zone, this is one of the few areas within the CA, apart from the rest of Victoria Park, where there is a group of early mature, large species trees (beech, birch, willow, sycamore). These act as a partial screen between the north-western extremity of the Park and the mass traffic on the A339 northwards. They go some way to creating a tree-lined thoroughfare along the edge of the Park. While the control of the trees is in the hands of the

Authority, their importance should be protected by dint of being in a conservation area. This edge of the park has already been left sliced and exposed by the widening of the A339.

More tree and shrub planting is urgently required along this boundary of the Conservation Area to screen the Park and create a green through-route along an unlovely stretch of dual-carriageway (This should have been implemented as part of the road widening scheme). The stand of mainly early mature trees between the boating pond and the A339 has been very successful in this respect.

Although outside the CA, tree planting along the east side of this section of the A339 should also be put in hand as soon possible, in advance of the Faraday Road industrial area being developed.

2.3 Area 2 Between London Road and Victoria Park, west of St Mary's Road.

Although the area comprises mainly new buildings there are some older structures, some with architectural merit.

Amongst the housing and office developments there is a relatively high proportion of trees, mostly in early maturity with a number of larger, mature specimens that can be seen across the fences from St Mary's Road. Subtracting this area from the CA would expose these trees to removal (to let more sun into the garden or to add a few more parking spaces), or inappropriate lopping, long before they were able to contribute significantly to the views of this part of the town and from Victoria Park. Park View House (65 London Road/Park View) and its car park are just outside the CA. The trees around the carpark (have been hideously mutilated by inappropriate pruning. In side the CA they would have been protected and could well now be respectable trees contributing to the townscape.

I feel an extension of this character area to include the older buildings along London Road, including St Joseph's Church, notwithstanding the lack of trees here.

2.4 Area 4 North-east of Oxford Road, up to the old College Roundabout.

Similar to both the above areas, this zone provides an attractive green entrance to the town from the old Oxford Road, with some interesting older buildings, in contrast to

Waitrose and its featureless 10ft retaining wall opposite. Adding the 'attractive,' traditional 'historic' old Schoolhouse whilst removing the older roadside buildings, trees and greenery that make an attractive street-scene from the CA would be perverse and detrimental.

Removal from the CA would again enable private owners to remove trees that they perceive as troublesome, but having considerable visual amenity value for the public.

2.5 Area 5 West of Northbrook Street, behind the old Bayer complex.

I welcome the inclusion of Area 5, particularly the tree stock, which are mainly in early maturity and still to have significant visual impact. Unfortunately, this area is much neglected these trees have been allowed to grow too close together, outgrown the site and are now suffering from excess competition and inappropriate arboricultural work. They should have been re-spaced (an arboricultural term) thinned out (a forestry term). With an appropriate management scheme this site could be brought back to become significant stand of trees right in the town.

2.6 Area 7 The northern part of this zone, west of Oddfellows Road and Bartholomew Street.

One of the most important trees in the town is the massive horse chestnut that stands at the front of The Maltings in Kennet Road. The tree and its two smaller companions carry TPOs. However, the tree is currently within the Town Centre CA but, depending on the accuracy of the boundaries of the subtracted area depicted on the report map, seems destined to lose its Conservation Area protection. It would be regrettable if the trees and the green setting were to lose the protection afforded by being in a Conservation Area.

2.7 Area 10 Derby Road and northern end of Newtown Road.

This zone includes the old Wellington Arms pub and adjacent old buildings.

2.7.1 Although the trees in Derby Road are few and provide limited visual amenity (four birch in early maturity and an ash) they do provide a green edge to this very old part of the town. It is likely that the ash will have to be taken down when it inevitably succumbs to ash die-back disease, and this will make the birch even more visually important. If the west side

of Derby Road was to be taken out of the CA, these trees must be covered by a group TPO.

2.7.2 The southern end of Newtown Road, from the St John's Roundabout to Newtown Road cemetery, including the traditional St John's Post Office. This area contains a group of large, mature trees including lime, Scots pine, ash, sycamore, birch, evergreen oak (Holm oak/Quecus ilex).

(Some of the group, it should be noted are additionally covered by specific TPOs). The group is a significant feature at this busy intersection as one enters the main town from the south and south-west. The trees also provide an attractive green route into the new Newtown Road CA, running up and into the tree-lined Newtown Cemetery and complementing the memorial garden on the other side of the road. Most of the trees stand in the grounds of St John's Gardens. To lose or have inappropriately lopped an unprotected tree, just because, for instance they were casting too much shade, would be a loss to the general treescape of both Conservation Areas. It would make spatial sense to retain this area as part of the new CA.

2.8 Area 14 The grassy area between Station Approach and the A339

Part of this area include the railway embankment parallel with the railway station and presumably owned by the railway.

This area would be suitable for tree planting, (if the railway could be persuaded as part of the upgrading of the station).

This area is summarily dismissed in the appraisal and apparently rather insignificant. However, this small area of early mature trees is seen from the whole length of Cheap Street and from the Market Place and screens the dual carriageway, the ugly new railway bridge parapet and the equally ugly Halfords building from this part of the 'Kennet Centre character area.' Up close, the small area creates a green screen and zonal demarcation between the dual carriageway and the south-east corner of the Conservation Area.

I am not aware of the responsibility for this small area, but the trees need protection as an important feature. This area is sometimes used as a storage area for contractor's equipment and has recently been partially excavated, all to the inevitable, long-term detriment of the trees; this should have

been prevented. This area deserves to be treated with more respect and afforded the protection of the CA, and enforced, if the trees are to provide a long-term contribution. It would benefit from some infill planting to reinforce the screen.

2.9 Area 15 Area next south west of Police station roundabout.

Although the architecture lends nothing of note to the CA, the four plane trees are another small but significant green demarcation of the CA against the dual-carriageway. The cherry in the adjacent 'bed' would benefit from additional tree planting. As Area 14, the Appraisal dismisses this little area as having little relevance to the CA. However, it is an important and effective screen from the road of the Telephone Exchange building as one approaches the roundabout from the south. Again, I am unaware of ownership, but this area, like Area 14, has been used for storage of equipment which inevitably damages soil structure and therefore the very limited rooting area that has been allowed for these trees. Being within the CA allows the local authority to prevent misuse of this area and damage to the trees.

2.10 Area 17 Area northwest of the police station roundabout

Trees have been established on the sloping verge of the A339 overlooking the new bus station, amongst existing small trees and shrubs.

This area proposed for subtraction includes the dry-cleaner's parking area at the southern end of the Wharf car park next to Bear Lane. This case provides an example of the threat under which trees exist in the urban environment and highlights a missed opportunity to recognise trees as a public benefit, by making use of the Conservation Area provisions in the Town and Country Planning Act. Two large sycamore trees used to stand in this small parking area ( - the stumps are still there). Planning authority consent (Ref. 14/01592/TPC) was given in 2014 to take down one tree 'because it was damaged by the wall,' and prune the other. The second tree has been removed since. These were significant trees in an otherwise rather bleak situation opposite the BT tower. Even being within a Conservation Area was not enough to ensure their protection. The threat to

the trees appears to have been ignored within the planning decisions when this old pub site was developed and subsequently, a replacement tree could have been insisted on by the planning authority when the trees were removed. Even within a Conservation Area, trees are at risk. Subtracting the protection of the conservation area to trees, as the appraisal recommends, will leave the valuable tree stock even more exposed and at risk.

### 3 Additional Recommendations

3.1 A Tree Warden scheme should be instigated for the town, with particular attention to the Conservation Areas.

3.2 Trees removed from within the Conservation Area should be replaced in the same position or immediately adjacent.

3.3 Stringent monitoring of building work within potential rooting distance should be enforced at the owners' expense, all as recommended in BS5837:2012 'Trees in Relation to Design, Demolition and Construction', and strictly audited by the tree team in West Berkshire Council. (In Area 1 there was a row of about five or six mature beech, with considerable safe life expectancy- until that is, Charlton Place roadway was constructed within a few metres of the trees. This inevitably caused massive root and soil damage leading to decay making the trees unsafe, to the extent that they all had to be removed ten to fifteen years ago. The stumps are still there).

3.4 When considering planning applications serious consideration should be given to the distances between existing trees and their growth potential and the elevation of the structure. The local authority should write into planning policy a higher consideration for tree planting.

3.5 A select few tree work contractors should be able to be recommended by the Tree Team at WBC and their work audited to conform to the latest tree work guidance and industry best practice.

3.6 Set up a working party to identify potential planting plots. This could mean removing individual parking spaces in existing car parks!! (Cars or trees?).

3.7 Plant larger-species trees than the inoffensive municipal cherries, crab apples, rowans, birch etc.

Resident	<p>I should like to confirm objections and support on this consultation as listed below. An appraisal of the conservation areas would be good to ensure that the long-standing protections are enshrined in law, however the “subtraction” of some areas is largely unnecessary and requires careful examination and discussion. Many of the smaller “subtraction” areas have trees which are extremely important in terms of conservation. I have added objections and other comments to the points below.</p> <p>On the boundary changes (1-17) proposed in the draft Appraisal:</p> <ol style="list-style-type: none"> <li>1. SUBTRACT: Grass "verge" NE of Victoria Park, alongside the A339. I object to this subtraction of green space.</li> <li>2. SUBTRACT: [St Mary's Road area] between Victoria Park and London Road I object, but might consider subtraction of part of this area and request that any decision is postponed until the next review of the conservation area.</li> <li>3. ADD: Infant Schoolhouse, Speenhamland. I definitely support this.</li> <li>4. SUBTRACT: Area NE of Oxford Road [opposite Waitrose] I strongly object to this.</li> <li>5. ADD: Area west of the Broadway and Northbrook Street [N end, behind street-front buildings] I support this.</li> <li>6. SUBTRACT: Area west of Northbrook St [the whole of the N-S part of West Street etc] I object to this. Please defer any decision until the next review of conservation area.</li> <li>7. SUBTRACT: Area west of Oddfellows Rd and Bartholomew St [incl. part of Craven Road]. I object to this; please defer any decision until the next review of this conservation area.</li> <li>8. ADD: Area traversing the railway [61 Bartholomew St etc] Please check the 1990 boundary schedule before any decision is taken.</li> <li>9. SUBTRACT: Area south of the railway [Pound St, part of former Jewson builders' yard] I support this.</li> <li>10. SUBTRACT: Area south of Derby Road and south of St John's roundabout. [3 areas] I object to this.</li> <li>11. SUBTRACT and ADD: [Areas in] Link Road and Newtown Road (minor) [Fair Close etc] I object to this.</li> <li>12. SUBTRACT: Western part of St Nicolas' School playground (There is an error in description 4.15 p. 19;</li> </ol>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p> <p>A conservation area is not designated on trees alone – Please refer to “General Approach” Item No. 4 for more detail. Should any trees of high amenity value fall outside of the proposed conservation area boundary, these will be assessed concurrently with the council's tree officers to assess whether those trees are of sufficient value to warrant a TPO. In such cases, TPOs will be designated where appropriate concurrently with the updated conservation area boundary.</p>
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	<p>listed as Area south of Derby Road and south of St John's roundabout i.e. a repeat of the description for area 10). I do not object to this.</p> <p>13. SUBTRACT and ADD: Areas by Newbury station (minor) [S of railway, W of station building] I do not object to this.</p> <p>14. SUBTRACT: Area north of the railway [Station Approach triangle]. I object to this.</p> <p>15. SUBTRACT: Area to the west of the A339 [E end of Kings Road W]. I object to this.</p> <p>16. ADD: Area around the old Post Office. Please check the 1990 schedule as the former post office is within the conservation area. I would support adding the Royal Mail yard and adding this stretch of Bear Lane.</p> <p>17. SUBTRACT: Newbury Wharf, area of bus station and car park near KFC. I object to this.</p>	
Resident	<p>Area 6: Subtraction of the area west of Northbrook Street: 4.10 This western boundary is complex due to the piecemeal development to the rear of the buildings on Northbrook Street and The Broadway; the historic street and field patterns has been largely lost due to modern commercial development. The proposed changes are to make the boundary easier to understand by running along existing plot boundaries and land divisions, excluding modern development where possible which does not contribute to the special interest of the area. Whilst characterful in their own right, the row of 19th century terraced houses on West Street are not of sufficient interest to justify inclusion, especially when this would come at the cost of including neighbouring modern development of an adverse character. This area is not of sufficient historical or architectural interest to justify its inclusion."</p> <p>I disagree with the above statement that the row of 19th century terraced houses are not of sufficient interest to keep this area listed as part of the conversation area. They are an important feature of that part of town, with links to Highclere Castle and the Carnavon family, and are therefore an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. I ask that this planned exclusion from the conservation area can be reversed, as these terraced houses contribute immensely to the local historical character of Newbury.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. Area 6 has been reassessed as part of this process and is confirmed to lack the special historic and architectural interest required to justify inclusion within the conservation area. The reductions to the conservation area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. The Georgian Terrace on West Street will be considered separately for local listing. Please refer to "General Approach" Item Nos. 2 and 3f for more details.</p>

Resident	<p>I am writing to express particular concern about the treatment of Conservation Area boundaries around the Kennet and Avon Canal and River Kennet as they pass through Newbury. The ambience of various areas (eg the lock and the canal towpath) - which have become a vital 'lung' in the town centre - are dependent on views into and out of the existing conservation areas as well as the physical characteristics (both structures, green spaces, trees etc) of those areas themselves. It is important that the protection of these aspects of the Kennet and Avon Canal/River Kennet and their immediate surroundings remains as strong as at present and there is no time when weakened protection can be exploited by developers. Can we be reassured that the implementation of any changes made as a result of the current consultation will not result in the loss - even temporarily – of conservation area status to the East and West sections of the Kennet and Avon Canal?</p>	<p>The Kennet and Avon Canal Conservation Areas (east and west) are already separate conservation areas and will remain so. Please note that some sites are proposed to be included within other neighbouring conservation areas, such as West Berkshire Museum and others. The boundaries for neighbouring CAs will be updated/adopted concurrently with NTC so that no areas of significance are left unprotected. Please refer to "General Approach" Item Nos. 1, 2 and 3 for more details, including the revised approach for each area. The level of protection afforded to both canal conservation areas will remain the same. The council will coordinate the updated boundary of both canal conservation areas in parallel to the proposed updates to the Newbury Town Centre Conservation Area boundary.</p>
Newbury Town Council	<p>The Town council is pleased that West Berkshire District Council are finally progressing the preparation of the Newbury Town Centre Conservation Area Appraisal. The Council welcomes the positive support the draft document gives to conservation measures and the guidance set out for conservation and future planning and development within the area covered by the CAA. However, there is serious concern that the District Council failed to involve or discuss the preparation of the draft document with any local interests such as the Town Council, the Newbury Society or the Newbury District Field Club, or to avail of local expertise such as Dr David Peacock, who would have been more than willing to assist in this matter. As a consequence of this, the draft document contains many inaccuracies and mistakes which could have been easily picked up with local assistance and involvement. This is the approach recommended by Historic England, which encourages planning authorities preparing conservation area appraisals to consult and involve local communities, Parish Councils and other relevant local bodies.</p>	N/A – No response required
Newbury Town Council	<p>This is a very important matter for Newbury and we are very disappointed that the District Council has not involved or consulted us or any of the other interested parties or</p>	<p>All photography and surveys were undertaken in 2020 and 2021 as part of the 2021 document and it is not currently proposed to update this. As such, the document</p>

	<p>organisations in Newbury who could have provided valuable insight and information in the preparation of this draft. These are the people who will also support and champion the CAA when it is made. This is despite the guidance from Historic England that these stakeholders should have been involved and consulted. We would also point out that the WBC Conservation Area Working group did not meet to consider this matter ( the Working Group has not met since before the pandemic). Our Town Council members who are also members of WBC knew nothing of the preparation of this draft.</p> <p>Regarding the document itself, the many errors contained in the draft could have been identified and addressed had the appropriate parties/ stakeholders been involved in the drafting. The title of the draft says "December 2021". We are unclear if this is a typo or if a year actually elapsed between the date the document was ready and when WBC consulted on it. The Town Council wishes to bring the following matters to your attention:</p>	<p>will remain a representation of the conservation area from 2021.</p>
<p>Newbury Town Council</p>	<p>A) Boundary review: Concern was expressed that, given the boundaries shown in the map on page 16 between the adjacent Kennet and Avon Canal conservation areas and the Newbury town centre conservation area, this Appraisal would effectively remove sensitive areas from the Newbury town centre conservation area, without acknowledgement or consultation. This problem is a consequence of the draft Appraisal's inaccurate interpretation of the existing boundaries of the Newbury town centre conservation area, confirmed in 1990, which lie far from Newbury Bridge both to the east and to the west. The areas removed would include Newbury Lock, West Mills (road and mills site), and West Berkshire Museum. These would then be without conservation area protections until the two Kennet &amp; Avon Canal conservation area boundaries could be redrawn to match those shown on the map (i.e. for an open-ended period).</p> <p>It was recommended that WBC checks the Schedule and map of the most recently approved boundary of the conservation area, dated 1990, to confirm the foregoing, and the error of the map on page 13.</p>	<p>Noted - the proposed boundary is being reviewed and checked as part of this process. The Kennet and Avon Canal Conservation Areas (east and west) are already separate conservation areas and will remain so. Please note that some sites are proposed to be included within other neighbouring conservation areas, such as West Berkshire Museum and others. The boundaries for neighbouring CAs will be updated/adopted concurrently with NTC so that no areas of significance are left unprotected. Please refer to "General Approach" Item Nos. 1, 2 and 3 for more details, including the revised approach for each area. The level of protection afforded to both canal conservation areas will remain the same. The council will coordinate the updated boundary of both canal conservation areas in parallel to the proposed updates to the Newbury Town Centre Conservation Area boundary.</p>

	<p>It was pointed out that seven Canal conservation areas were created along the canal across West Berkshire in 1983, and suggested that the two adjoining Newbury be known as Kennet and Avon Canal (Newbury East) and Kennet and Avon Canal (Newbury West). These are, in fact, the existing names. Also that in several places the draft CAA has east and west the wrong way around.</p>	
<p>Newbury Town Council</p>	<p>This Council recommends the following responses to the proposed boundary changes:</p> <ol style="list-style-type: none"> <li>1. subtract: grass “verge” NE of Victoria Park. Object. Trees on the site provide an important screening effect as part of its ambience, and should be protected as part of the conservation area.</li> <li>2. subtract: [St Mary’s Road area] between Victoria Park and London Road: Object to the removal of this area as a whole. As a minimum, parts bordering Victoria Park, areas containing mature trees and areas around buildings of value should be retained in the conservation area. In practice, this requires retaining this area at present to ensure that time is available for a more considered decision to be taken.</li> <li>3. add: infant schoolhouse, Speenhamland. Support.</li> <li>4. subtract: area NE of Oxford Road [opposite Waitrose] Strongly object. This contains important listed buildings such as Wessex House and 20 Oxford Road, and is an important gateway to Newbury.</li> <li>5. add: area West of the Broadway and Northbrook Street [N end] Support.</li> <li>6. subtract: area West of Northbrook Street [West Street etc] Object. No arguments have been presented for its removal.</li> <li>7. subtract: area West of Oddfellows Rd and Bartholomew Street [incl. part of Craven Road]. Object. This includes 1840’s buildings and the 1862 Diamond House in Craven Road, a major horse chestnut tree in Kennet Road, and the former Phoenix Brewery and its brewer’s house.</li> <li>8. add: area traversing the railway [61 Bartholomew Street, etc] Comment. This is already in the conservation area, except for the section of railway, which does not need to be included.</li> <li>9: subtract: area south of the railway [Pound Street, part of former Jewson builders’ yard]No objection.</li> </ol>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p> <p>A conservation area is not designated on trees alone – Please refer to “General Approach” Item No. 4 for more detail. Should any trees of high amenity value fall outside of the proposed conservation area boundary, these will be assessed concurrently with the council's tree officers to assess whether those trees are of sufficient value to warrant a TPO. In such cases, TPOs will be designated concurrently with the updated conservation area boundary.</p>

10. subtract: area south of Derby Road and south of St John's roundabout. Two areas. Object. (a) Hampton Road and Derby Road. This is an important historic setting comprising a number of listed buildings. The 1930's locally listed buildings and their ambience require protection. (b) In the angle between the St John's Post Office/Old Newtown Road and Newtown Road, the area of trees. These make a significant and positive contribution to the conservation area, and should be retained.

11. subtract and add: [areas in] Link Road and Newtown Road (minor) [Fair Close etc] Object. This is the historic Fair Close. It provides the setting for the Lower Raymond's Almshouses, and the planting makes a positive contribution to the conservation area. The lack of detail in the map makes it difficult to be precise about the exact area involved.

12. subtract: Western part of St. Nicolas' school playground (error in description 4.15 p. 19; listed as area south of Derby Road and south of St. John's roundabout i.e. a repeat of the description for area 10). No objection.

13. subtract and add: areas by Newbury station (minor) [S of railway, W of station building] No objection.

14. subtract: area north of the railway [station approach triangle]. Object. This site provides an important boundary to the conservation area, including trees which can be seen from along Cheap Street and as far away as the Market Place, helping to screen the conservation area from the A339 dual-carriageway.

15. subtract: area to the West of the a339 [E end of kings Road W]. Object. Again this provides a soft boundary to the conservation area, with four plane trees, another tree and the neglected opportunity for more planting. It also helps to partly screen the unsightly Telephone Exchange from the A339.

16. add: area around the old post office. Comment. The former post office is already inside the CAA. However, we would support adding the Royal Mail yard (particularly the Cheap Street end, following the building line) and would not object to adding this stretch of Bear Lane.

17. subtract: Newbury wharf, area of bus station and car Park near KFC. Object. This area was added to the conservation area in 1990 following strong local opposition to development plans for Newbury Wharf the previous year. It allows open

	views towards the Granary/ Corn Stores and with landscaping / planting (including the replacement of mature trees which were present in 1990) could make a positive contribution to the conservation area.	
Newbury Town Council	B. Character Areas and Zones: The Town Council recommends that the Town Centre conservation area should be divided into at least two separate areas (north and south?) to facilitate reviews in future years.	There are currently no plans to split the area into two separate conservation areas, other than the proposed separation of the area to the south (newly proposed Newtown Road CA) and the various boundary amendments, as explained above.
Newbury Town Council	C. Building Audit: The Town Council has serious concerns at failures in the draft regarding listed buildings. The total of listed buildings is wrong and some important ones are omitted. The Town council recommends that the CAA includes an audit of listed buildings, with a full list by name. At a minimum, there should be a list of the two Grade 1 Listed buildings and the seventeen Grade II* listed buildings within the conservation area. Photographs of all nationally and locally listed buildings, and buildings recommended for local listing, should be included in an Appendix, arranged street by street. As the first Appraisal for this area, this document will become a benchmark against which future change will be measured. The Council supports the recommendations for local listing of 6 additional buildings: <ul style="list-style-type: none"> <li>- 79 Bartholomew Street</li> <li>- The Nags Head</li> <li>- 44 Cheap street</li> <li>- Methodist Chapel (Hampton Road)</li> <li>- The Cross Keys</li> <li>- The Salvation Army Hall.</li> </ul> The Town Council also recommends the addition of St. John's Vicarage.	Noted - The document will be reviewed as part of this process. It would be disproportionate to conduct a full detailed assessment of all notable buildings in Newbury. Such a detailed assessment is not the function or purpose of a Conservation Area Appraisal, which is reserved for Heritage Statements. However, a simple list of heritage assets is proposed to be included. Please refer to General Approach Item No. 5 for more detail.
Newbury Town Council	D. Positive, negative, and distracting elements: The Town Council welcomes this useful summary. Re "Failures to apply the Supplementary Planning Guidance (2003) on Shopfronts and Signs – Walkabout, Wilco, shopfront in Pound Street (Figure 218)." The Town Council recommends that the SPG 2003 be added to the Planning Policy Context (Section 3 of the draft). Paragraph 11.8 of the draft refers to "Inappropriate signage, wayfinding, street materials, furniture, lighting and other infrastructure that erode the historic character and	Noted - The document will be reviewed as part of this process.

	<p>appearance of the conservation area”, which includes “ In some areas, traffic-related infrastructure and markings add to a sense of street clutter, which is at odds with the town’s historic character. In a few instances, telegraph poles and overhead wires detract from the area’s appearance, however, this tends to be focused around the conservation area’s extremities and residential streets.” The Town Council recommends the addition of the following sentence: “Listed buildings need to be considered when siting and designing street furniture, waste bins, and signage”. The Town Council feels that trees can enhance a conservation area and the CAA should contain a statement to reflect this and protect those trees which enhance the CAA, particularly where not covered by a TPO.</p>	
<p>Newbury Town Council</p>	<p>E. Policy on building heights. The Town Council supports the Policy as set out in the draft CAA: 13.10 POL6: New development schemes should adhere to the following criteria:</p> <p>a) The height, mass and bulk must be carefully considered to avoid adverse impact on key views and loss of character. Assessment of views (not necessarily limited to the key views set out in this document) through CGIs and verified views may need to be provided as part of any application to the local planning authority in order to allow for the full assessment of impacts. b) Building heights for each character area should respect the established building heights in the immediate area, as set out for each character area in Chapter 12: Character Areas and Zones in this document. New development should not be excessively tall or dominant, but should present a clear and logical continuation of the existing townscape. New development should not interrupt the overall roofline in the key views set out in Chapter 9: Setting and Views in this document. c) New development schemes should seek to enhance buildings identified as negative contributors in the Buildings Audit map in this document. Designated heritage assets and positive contributors should be preserved, and new development must be carefully designed to respect their scale, height, character, setting and significance.</p> <p>The Town Council notes the list of “Negative Contributors”, pages 246-247 and Recommends that the BT Telephone Exchange (Tower) be added to this list. Given its</p>	<p>Noted - The document will be reviewed as part of this process</p> <p>Please note that it is not possible to identify buildings outside of the agreed conservation area boundaries, or include them on mapping studies. However, it may be possible for the BT Telephone Exchange to be acknowledged as a detracting feature as part of the conservation area’s wider setting. However, it will not be possible to include it on the building audit map or the list of negative contributors.</p>

	<p>disproportionate size and proximity to the conservation area, the Telephone Exchange should be specifically excluded for consideration as a precedent when considering the heights of any new buildings. (Assessment Framework for “Negative Contributors” 8.15 These have been defined as those buildings which detract from the character or appearance of the conservation area and do not provide a positive contribution in their current form. In these cases, there may be the opportunity to enhance the conservation area by appropriate alterations or redevelopment on the existing site. It is expected that a replacement building would actively enhance the conservation area, presenting an appropriate form of development and a well-considered response to the character of the conservation area and site’s unique environs.) Re paragraph b) above, the Town Council recommends the following amendment: Building heights for each character area should respect the established building heights in the immediate area, (excluding negative contributors), as set out for each character area in Chapter 12: Character Areas and Zones in this document.</p>	
<p>Newbury Town Council</p>	<p>F. Management Plan: The Town Council welcomes the measures proposed in the Conservation Management Plan (Section 13) and recommends that Article 4 directions be added to the list of measures proposed. (See paragraphs 3.14 to 3.15 for Article 4 directions)</p> <p>13.4 REC3. The Town Council, noting that at present only one part-time Conservation Officer is in post, recommends that sufficient resources are budgeted and committed to ensure that this ongoing maintenance is achieved.</p> <p>G. The Newtown Road CAA. The Town Council has no objection in principle to this proposal but was concerned that part of the proposed area is in the current town Centre CAA. The removal of this part from the proposed Town Centre boundary will lose its current protection under CAA status until such time as the Newtown Road CAA is delivered. For this reason, the Town Council recommends that the northern portion of the proposed Newtown Road CAA should remain within the Town Centre CAA until such time as the Newtown Road CAA is completed.</p>	<p>Noted - The document will be reviewed as part of this process</p> <p>The council's resources and budgeting are outside the scope and purpose of the CAAMP document.</p> <p>As with the Kennet and Avon Canal Conservation Areas (east and west), the separation of the newly proposed Newtown Road CA will be carried out in parallel with the updated NTC boundary and the adoption of the NTCCAAMP, in due course. It is not intended to leave this area unprotected at any time. An appraisal for this area (as with both canal CAs) would need to be carried out separately, when resources allow. Historic England has confirmed that the lack of a separate appraisal document will not have any adverse impact on the legal protection that the updated boundary will afford, but it is helpful for future management. Please refer to General Approach Item No. 1 for more detail.</p>

	<p>H. References Relevant documents should include also: § Pevsner for Berkshire 2010 (Yale). Newbury Buildings Past and Present (1973) Roy Tubb, Newbury Road by Road (2011).</p>	
Canal and Rivers Trust	<p>Thank you for the opportunity to comment on the draft TCAAMP – we recognise the scale of this significant undertaking to update Area Appraisals for Newbury and welcome the opportunity to contribute to the CAAMP. In response to the consultation and questions listed in the survey please see below response on behalf of Canal &amp; River Trust.</p> <p>Q- Should the boundary changes be made ? Yes, we welcome the acknowledgement in the CAAMP of both the Kennet &amp; Avon West and East C.As and the retention of boundaries therein with no proposed subtractions. The K&amp;A Canal makes significant positive contribution to the character and appearance of the CA.</p> <p>Q - Do we think that anything is missing from the draft CAAMP ? We would like to suggest that the K&amp;A Canal is recognised for its bio-diversity in section 5.15 as a significant contributor to the CA and that Bio-Diversity be protected via the CMP Policy section 13.10 New Development , particularly with regard to lighting schemes and potential detrimental affect on Bats which are a protected species that use the K&amp;A canal corridor as valuable habitat.</p> <p>Q - Do you have any further comments in relation to the CAAMP ? We welcome the acknowledgement of the K&amp;A Canal in s 4.23 and s4.24. We would like to suggest that in addition to the detailed Gazetteer in s8. Designated Heritage Assets s.8.23 &amp; 8.3 address key Non-Designated Heritage Assets and recognise the assemblage of historic waterway structures as NDHAs (where not already Listed) to help to protect the historic structures and to recognise them as `positive contributors` to the C.A</p>	<p>Noted - the proposed boundary is being reviewed and checked as part of this process. The Kennet and Avon Canal Conservation Areas (east and west) are already separate conservation areas and will remain so. Please note that some sites are proposed to be included within other neighbouring conservation areas, such as West Berkshire Museum and others. The boundaries for neighbouring CAs will be updated/adopted concurrently with NTC so that no areas of significance are left unprotected. Please refer to "General Approach" Item Nos. 1, 2 and 3 for more details.</p> <p>This document deals with the Newbury Town Centre Conservation Area only, and so may not cover items specific to the adjacent canal conservation areas in detail (although they may be referenced at a high level, as part of the conservation areas wider setting). The document will be reviewed in light of these comments and additional references made where needed.</p>
Resident	<p>I live in the conservation area and own my house. I am thrilled that you are taking my house (46 Northcroft Lane) out of the conservation area. When do you think this will be effective from? Please make the draft amendments to the borders of the conservation area. These far better reflect the areas in need of conservation. I live in a quotidian block of terraced houses. There is no reason to block development</p>	<p>NA - no response required</p>

	<p>and improvements. We need more housing, and we need it here!</p>	
<p>Councillor Tony Vickers</p>	<p>I was very unimpressed with the consultants' report and very surprised indeed that there appears to have been no communication between them and the town council or Newbury Society during their work. Nor has the report been mentioned as far as I can recall at any meeting of any formally constituted body of West Berkshire Council that I have attended as a Member since the start of the current Council period in May 2019. That is apart from a meeting in the first year (2019/20) when it was resolved that this particular CAA would be the top priority of all 50+ CAAs that were outstanding.</p> <p>Should we be grateful that at least some work has been done? Not really – when we have waited over 50 years for any resources whatsoever to be applied by the Local Planning Authority to this its statutory duty.</p> <p>I am puzzled as to what the District Council's "Conservation Area Working Group" is. Is/was it merely an informal collection of interested members of the public whom the consultants and/or the Planning Authority case officer chose to assemble to advise and "work" with? Or was it formally constituted? If the latter, when and how – and why was apparently no elected Member from one or other Newbury District Wards (such as myself, also the Opposition Planning Spokesperson) invited to be on it, or even told about it? Is it still in existence? If so, why hasn't it met (according to my town council colleagues who were on it) since before the pandemic?</p> <p>As for substantive comments on the document, I have not had time to thoroughly read it because this consultation clashes with a much larger and more important one on the Regulation 19 Local Plan Review. From what I read of Dr David Peacock's comments and those of the Newbury Society, which the town council has mentioned in their response, I thoroughly support everything they say.</p> <p>I cannot believe that the document as it stands will be found fit for purpose by the Planning Authority but I very much hope that the good bits in it will be used to take the matter forward in a more professional manner. I hope to engage with the</p>	<p>Consultants' Approach to Drafting the Document and Engagement</p> <p>The CAAMP document was drafted in 2021 and coincided with the second Covid lockdown. At the time, a decision was made that the document would be drafted first and then that this draft would form the basis for the public consultation. The document was planned to be updated after this, in response to the comments received. Due to resourcing constraints, the public consultation took place towards the end of 2022 (23/11/22) to the beginning of 2023 (06/01/23). The council has been able to restart the engagement processes earlier this year and has conducted a Key Stakeholder Meeting (involving interested parties and individuals, 23/04/24) and a meeting with Historic England (23/04/24). The document is currently being updated following these meetings and a review of all public consultation comments received.</p> <p>Conservation Area Working Group</p> <p>The Conservation Area Working Group was an informal group comprising of the former Principal Conservation Officer and the West Berkshire Heritage Forum, which worked together with local historic groups, parishes, and town councils to create Conservation Area Appraisals. The emails containing the original flyer and toolkit documents to encourage involvement in the Conservation Area Appraisals are attached for your information. This Working Group has not met since 2022 due to a lack of resources.</p> <p>Newbury Society Comments</p> <p>As part of the public consultation process, the Newbury Society's comments have been considered in detail to inform the updated NTCCAA.</p>

	process after the May elections either as a town council or district council member – or both.	
Resident	<p>I have reviewed your documentation and note that there is a planned increase to the area to include the majority of the houses within Chesterfield Road within what is proposed to be a new conservation area designated as 'Newtown Road Conservation Area'. It recommends (rec 2 – item 13.3) that the boundary changes be adopted and then states the following: Despite the reasoning for its separation, it still has historic and architectural merit and should remain protected. If possible, this should be done in parallel with the adoption of the Newbury Town Centre Conservation Area Appraisal. Does this mean that it will be subject to the same policies as proposed for the Town Centre or will there be a separate consultation document with policy for this as it is recommended as a different area due to the different nature (as noted in item 4.26) – surely if it is that "the area has a wholly different character and appearance to that of the Town Centre" then it would require a separate set of policies and its own consultation document?</p>	<p>The separation of the newly proposed Newton Road CA will be carried out in parallel with the updated NTC boundary and the adoption of the NTCCAAMP, in due course. It is not intended to leave this area unprotected. Please refer to "General Approach" Item No. 1 for more details.</p> <p>An appraisal for this area would need to be carried out separately, when resources allow. This would likely have its own set of management recommendations and design guidance to suit this area's character and sensitivities. Until such a document is produced, the area would be treated under the same legislation and planning policies that apply to all conservation areas, namely that changed and new development should conserve and enhance the character and appearance of the conservation area.</p>
Historic England	<p>Thank you for consultation Historic England on the draft Conservation Area Appraisal for Newbury Conservation Area and attendant Management Plan. We welcome the production of a draft conservation area appraisal for Newbury. Due to resource constraint we are only able to comment in brief on the document, but we hope it is of some use. We are aware that The Newbury Society have reviewed the appraisal and provided considerable detail in their response that raises a number of important considerations. In particular, the large number of inaccuracies need to be checked and corrected. Also, the possibility of areas being taken out of conservation area protection without being simultaneously protected within another is worrying where they are of the quality and character that warrants the protections the designation within a conservation area provides.</p> <p>We encourage the Council to pause, review and reconsider its approach where any areas may be left vulnerable. Appropriate resources should be allocated to the task of ensuring the proper amendments to this draft document take place and for the amendments to relevant other appraisals.</p>	<p>Noted - the proposed boundary is being reviewed in light of public consultation comments and a subsequent meeting with officers from Historic England. The reductions to the Conservation Area boundary are in response to Historic England and NPPF guidance to ensure that an area justifies designation as a conservation area because of its special architectural or historic interest, so that the concept of conservation is not devalued through the designation of areas that lack special interest. The areas of removal were found to have limited architectural or historic interest generally, and whilst it is acknowledged that these areas may have examples of historic buildings of interest (whether listed or un listed), these buildings alone may not be sufficient to justify the conservation area designations in those locations. Please refer to "General Approach" Item Nos. 2 and 3 for more details, including the revised approach for each area.</p>

	<p>We have also noted a couple of points including, given a new Local Plansis now at Ref 19 stage it would be useful to reference it (with caveats that it's not yet adopted and that policies might change). Finally, Litten Chapel is a scheduled monument – this should be mentioned at Figure 57 and on any mapping.</p>	
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