

INSPECTOR'S PRELIMINARY QUESTIONS TO THE COUNCIL (IN2)

and

WEST BERKSHIRE COUNCIL RESPONSE

September 2023

Duty to cooperate

Inspector:

The Duty to Cooperate Statement¹ provides information about engagement with local planning authorities and prescribed bodies on strategic matters² during the preparation of the Plan in the context of section 33A of the 2004 Act.

PQ1. What were the strategic matters that the Council needed to address during the preparation of the Plan?

Council response:

The strategic matters that the Council originally identified it needed to address during the preparation of the LPR are set out in Section 4 of the Duty to Cooperate Statement ([CD11](#)). These are:

- *Tackling climate change*
- *Sustainable and quality development*
- *Housing needs*
- *Economy*
- *North Wessex Downs AONB*
- *Green infrastructure and healthy living*
- *Transport*
- *Infrastructure requirements*

Paragraphs 4.4 and 4.5 of the Duty to Cooperate Statement ([CD11](#)) acknowledge that some of these matters are more critical for the preparation of the LPR than others and have required more attention as work has progressed. They also recognise that some matters have evolved in response to the emerging evidence base. This has included consideration of the strategic site at Grazeley.

¹ CD11.

² A "strategic matter" is (a) sustainable development or use of land that has or would have a significant impact in at least two planning areas, including (in particular) sustainable development or use of land for or in connection with infrastructure that is strategic and has or would have a significant impact on at least two planning areas, and (b) sustainable development or use of land in a two-tier area if the development or use is a county matter or would have a significant impact on a county matter [section 33A(4) of the 2004 Act].

More detail of those matters that have required particular cooperation, the key bodies involved and the work that has been undertaken to date are set out in Section 5 of the Duty to Cooperate Statement ([CD11](#)). These include:

- Consideration of the strategic site at Grazeley
- Impact of the Detailed Emergency Planning Zone (DEPZ) around the Atomic Weapons Establishments at Aldermaston and Burghfield
- Reading Borough Council's unmet housing needs
- Meeting the housing need for Gypsies and Travellers
- Meeting the identified need for employment land
- Ensuring due regard is paid to the primary purpose of the designation of the North Wessex Downs AONB
- The impact of development on the strategic highway network
- The approach to tackling health and wellbeing
- Flood risk and the impact of development on water quality, including the protection of protected sites through Nutrient Neutrality Zones
- Water resources and wastewater infrastructure

PQ2. What were the main mechanisms that were used to engage constructively, actively and on an ongoing basis with the relevant local planning authorities and other prescribed bodies to address the strategic matters during the preparation of the Plan?

Council response:

Details of the main mechanisms the Council has used to engage with the relevant local planning authorities and other prescribed bodies to address the strategic matters identified are set out in Sections 5 and 6 and Appendix 3 of the Duty to Cooperate Statement ([CD11](#)). This work has been an integral part of the preparation of the Local Plan Review and its evidence base and has included:

- Continuation of partnership working through regular meetings of established bodies including steering groups and working groups at both an officer and member level
- Specific meetings arranged as necessary to discuss particular issues and topics at both an officer and member level
- Workshops held on specific issues and projects, involving both officers and members where appropriate
- Written and verbal technical advice sought and received at both informal and formal stages of the plan preparation process
- Individual site visits to discuss particular issues as necessary in the consideration of the suitability of potential sites for development
- The development of joint methodologies
- The preparation of funding bids
- Preparation and use of a joint evidence base
- The preparation of Memorandum of Agreements
- The preparation of Statements of Common Ground

PQ3. Have any local planning authorities or other prescribed bodies made representations under regulation 20, or subsequently in discussions about the duty to cooperate statement of common ground, that claim the duty to cooperate has not been complied with?

Council response:

Yes, there have been a few representations made in relation to the duty to cooperate. Those comments that have been made in respect of the strategic matters identified are set out below:

- **Impact of the Detailed Emergency Planning Zone (DEPZ) around the Atomic Weapons Establishments (AWE) at Aldermaston and Burghfield**

Basingstoke and Deane Borough Council (ID: PS1722) has ongoing concerns about how restrictions relating to the AWE are applied to its borough and, most notably, the limitations they place on future sustainable growth at Tadley. The council would like to continue to work proactively with Emergency Planners at West Berkshire to ensure a suitable approach is taken to future growth and change and that all options, including suitable housing allocations, are fully considered.

- **Reading Borough Council's unmet housing needs**

Bracknell Forest Borough Council (ID: PS218) currently considers the LPR to be unsound because it is not yet clear how the unmet need is to be addressed by the other authorities in the Housing Market Area. It considers that this has implications for the duty to cooperate and so requests that further consideration is given to this matter.

The Home Builders Federation (ID: PS1680) also highlights the same issue and questions the effectiveness of the cooperation which pushes back consideration of the issue to a future plan review.

- **Meeting the housing need for Gypsies and Travellers**

Basingstoke and Deane Borough Council (ID: PS1724) wishes to ensure that West Berkshire Council is meeting its needs in full and that the Plan takes account of any potential impacts upon the borough and its residents. It has concerns about the shortfall in provision in terms of gypsy and traveller pitch provisions and is keen to continue to engage in suitable discussions under the Duty to Cooperate in relation to this issue.

- **Meeting the identified need for employment land**

Basingstoke and Deane Borough Council (ID: PS1723) wishes to ensure that West Berkshire Council is meeting its needs in full and that the Plan takes account of any potential impacts upon the borough and its residents. It has concerns about the shortfall in provision in terms of employment and is keen to continue to engage in suitable discussions under the duty to cooperate in relation to this issue.

- **The impact of development on the strategic highway network (SRN)**

National Highways (ID: PS1490) does not consider that the transport evidence base is sufficiently developed to inform a view on whether the plan is sound. It is concerned that the LPR does not currently make clear what is necessary in terms of transport intervention. Neither is it clear that the delivery of growth can be controlled such that it is in pace with the availability of necessary transport interventions and that unacceptable impacts on highway safety do not occur, or the cumulative impacts on the road network would not be severe. It makes clear that to ensure that the Local Plan is deliverable, the transport evidence base should demonstrate the impact on the SRN and as necessary identify suitable mitigation which has a reasonable prospect of delivery within the timescales of when the identified growth is planned. The Infrastructure Delivery Plan should then set out any SRN mitigation required to deliver the development.

Network Rail (ID: PS1093, PS1094, PS1097, PS1101, PS1104, PS1106) is concerned about the impact of the strategic development at North East Thatcham on the highway network and the existing level crossing at Thatcham. It also raised concern that the LPR failed to appropriately identify and support modal shift in the context of the trans-shipment of freight changes. In this context it commented that the growth and expansion of the road-rail transfer facilities at Theale should be supported in the Plan.

Hampshire County Council (ID: PS1075) is concerned about the potential implications of the strategic site at Sandleford (Policy SP16) on the A339 within Hampshire and is keen to work with the Council to discuss modelling parameters and underlying assumptions. It is Hampshire County Council's view that strategic traffic should be routed via the A34, therefore any evidence provided to demonstrate the suitability of a new access onto the A339 should take account of this position and consider wider strategic routes to and from the site. The County Council would also like to be involved as a stakeholder in any discussions regarding any potential changes to Greenham Business Park which are likely to affect traffic flows of heavy vehicles which utilize the A339 in accessing or departing from the site.

- **Provision of primary health care**

Thatcham Town Council (ID: PS1690) has expressed concern about the provision of primary health care in the LPR. It states that there is no mention of it in the Duty to Cooperate Statement ([CD11](#)). It points in particular to there being no cooperation with the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (ICB) in relation to the specific proposal for a 450 sq. metres GP surgery that would be offered to it as part of the strategic development at North East Thatcham. Cold Ash Parish Council (ID: PS415) concurs.

- **Evidence of ongoing cooperation and engagement**

The Home Builders Federation (ID: PS1680) highlights the lack of evidence to support any continuing engagement. It cites the West of Berkshire Strategic

Planning Group as an example and states that the Council will need to provide more detail if it is to show that it has co-operated effectively and met its legal duties.

Thatcham Town Council (ID: PS1698) is concerned that the Duty to Cooperate Statement itself is not legally compliant. It suggests that 'as a proposed submission document' the Duty to Cooperate Statement published as part of the Regulation 19 consultation in January 2023 cannot be modified because all proposed submission documents must have been available for inspection during the consultation period. It is also concerned that the Duty to Cooperate Statement or Statement of Common Ground was not made available prior to 6 January 2023. Neither of these issues it feels provide transparency to the public during the plan making process.

Other comments received relate to the perceived lack of consultation generally (with nothing specific on the duty to cooperate); previous concerns not being resolved; or relate to the soundness of the LPR itself. These include responses by Bucklebury Parish Council (ID: PS1226), Compton Parish Council (ID:PS330 & PS332) and Holybrook Parish Council (ID:PS615 PS621, PS626, PS634, PS636, PS646, PS648, PS651).

PQ4. What, if any, outstanding strategic matters are subject to ongoing discussions with any local planning authorities or other prescribed bodies and what is the latest position with regard to those?

Council response:

- **Impact of the Detailed Emergency Planning Zone (DEPZ) around the Atomic Weapons Establishments at Aldermaston and Burghfield**

The Council continues to work proactively and in partnership with neighbouring councils, including Basingstoke and Deane, as part of the AWE Off-Site Emergency Planning Group to ensure a suitable approach is taken to future growth and change around AWE.

- **Reading Borough Council's unmet housing needs**

Please see the Council's response to PQ24b.

- **Meeting the housing need for Gypsies and Travellers**

The Council is committed to preparing a separate Gypsies and Travellers DPD as set out in the Local Development Scheme (LDS) ([CD9](#)) and it is seeking to meet the requirements of the travelling community through this DPD. As part of its preparation the Council will continue to work proactively and in partnership with neighbouring councils, including Basingstoke and Deane as part of the duty to cooperate process.

- **Meeting the identified need for employment land**

Whilst the Council has formally sought assistance from neighbouring authorities with regards to employment needs within the District, the Council understands the current

position of Basingstoke and Deane Borough Council in terms of its ability to assist and as set out in the LPR the Council will seek to further address this matter through a timely five year review. The Council will continue to work with Basingstoke and Deane Borough Council and others as part of the duty to cooperate process on this issue.

- **The impact of development on the strategic highway network**

Please see the Council's response to PQ46.

- **Provision of primary health care**

The Council would point to paragraph 5.26 of the Duty to Cooperate Statement ([CD11](#)) which sets out how the Council has engaged constructively and actively on a regular basis with the Buckinghamshire, Oxfordshire and Berkshire West Integrated Care Board (ICB) in the production of the LPR. It makes clear that since October 2020 there have been regular monthly officer and ICB meetings where the implications of the LPR in terms of its impact on health care and possible future requirements are discussed. Meetings have also taken place with the NHS and the three GP surgeries who cover the North East Thatcham proposed strategic development (Burdwood, Chapel Row and Thatcham Healthcare) in September 2021 and December 2022. Whilst the nature of the provision of primary of health care on North East Thatcham is not set out in the Statement, it makes clear that the Duty has and is continuing to be complied with.

- **Evidence of ongoing cooperation and engagement**

In response to the other issues raised under PQ3, it is important to clarify that part of the requirement of the Duty to Cooperate is that it must be done on an ongoing basis. The Duty to Cooperate Statement produced in January 2023 therefore set out the position at that time. As a supporting document the Statement was then updated in March 2023 and was submitted to the Secretary of State alongside the LPR in accordance with Regulation 22(1)(e) of the Town & Country Planning (Local Planning) (England) Regulations (2012 as amended). Although the Memorandum of Understanding between the Berkshire Unitary Authorities on Strategic Planning and the Duty to Cooperate on Planning Matters in Berkshire has been publicly available since 2016, it is acknowledged that the Council did not publish the Western Berkshire Statement of Common Ground (signed in August 2021) on its website until January 2023.

Public consultation

Inspector:

Section 19(3) of the 2004 Act requires the Council to prepare the local plan in accordance with its statement of community involvement.

**PQ5. (a) Is the Council satisfied that it prepared the Plan in accordance with its statement of community involvement?
(b) Were any concerns raised in representations made under regulation 20 that consultation failed to comply with the statement of community involvement or other legal requirements?**

Council response:

PQ5 a) As outlined in the Consultation Statement ([CD4a](#)) it is considered that the consultation on the preparation of the Local Plan Review has been undertaken in accordance with the relevant Regulations and the Council's Statement of Community Involvement, adopted in January 2020.

PQ5 b) See responses to PQs 3-4 in respect of the Duty to Cooperate, as comments were made in relation to the Duty to Cooperate. The Statement of Community Involvement sets out how the Duty to Cooperate is undertaken.

In addition, and in summary, Thatcham Town Council raised the unavailability of the West Berkshire Council's website on 21st and 22nd January 2023 because of planned maintenance work. The Town Council commented that this effectively shortened the consultation by two days, to less than the 6 weeks required.

Representations commented on the type of consultation, as some respondents did not find the online system user friendly, with perceived reliance on web-based consultation. The representations suggested that this was problematic to those without internet or without knowledge of how to use the internet. A few representors commented that there were no public exhibitions or presentations.

In relation to North-East Thatcham many of the representors commented that there has been no consultation with the health authorities, Natural England and/or water operators.

Representors commented that the evidence base was not altogether available until January 2023 when the Regulation 19 consultation commenced (air quality, HELAA, Thatcham Strategic Growth Study). On the topic of the HELAA representors outlined that Members did not have sight of the HELAA at the December Council meeting, and therefore were not fully informed of the full evidence base for the site selections at the time of taking the decision to proceed with the Regulation 19 consultation. Representors were concerned that sites were selected and allocated, and the plan

finalised prior to finalisation of the HELAA site assessments, which were not presented to Members in advance of the consultation commencing.

Some representors considered that the consultation was confused by the then opposition Members' (Liberal Democrats) motion to stop the consultation due to the 'flaws in Local Plan evidence', at the 2 March 2023 Council meeting. Those representors stated that this would have impacted on decisions on whether to make representations.

Many comments suggested the consultation should have been delayed until the NPPF had been updated, with regards to housing targets. Furthermore, the timing of the Regulation 19 consultation conflicted with the consultation on the NPPF. Concern was raised through representations with the process of presenting the Local Plan to Members at Council, and not requiring the submission version of the Plan to go to a further Council meeting prior to submission to the Secretary of State.

Questions were also raised by Bucklebury Parish Council with respect to a lack of consultation for the Settlement Boundary Review (SBR) and the Infrastructure Delivery Plan (IDP). Consultation was launched in February to March 2020 on the SBR review, which this was undertaken at the time of the first COVID-19 lockdown. Bucklebury Parish Council (BPC) report they were not consulted, and WBC reported that BPC did not respond.

Equalities

Inspector:

Public authorities are required under section 149 of the Equality Act 2010 to have due regard to the following aims when exercising their functions:

- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Act;
- b) advance equality of opportunity between persons who share a relevant protected characteristic³ and persons who do not share it; and
- c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

An Equality Impact Assessment of the Plan was carried out⁴. This concludes that the Plan will have a positive impact on all people with protected characteristics through the delivery of housing (including affordable housing) and employment; improved transport and accessibility; and the provision of improved, and safe access to, open space, recreational, health, education, leisure, community and faith facilities and services. The assessment also found no evidence that the Plan will have a negative impact on people with protected characteristics.

PQ6. Were any concerns raised in representations made under regulation 20 that the Plan is likely to adversely affect persons who share relevant protected characteristics as defined in s149 of the Equality Act 2010?

Council response:

Yes, there were 8 comments made that the LPR would have a negative impact on people with protected characteristics.

Two local residents were concerned (ID:PS353) about the inclusivity of the consultation process, commenting that all public bodies have a duty to make public consultations available to all interested parties. This includes making reasonable adjustments for those parties who may have problems with complex language or reading. They stated that, implicitly, consultation should not be restricted to those parties who have greater resources. Restricting consultation to online only means that those parties who do not use the internet or have difficulties with reading/language are excluded.

In relation to the Equalities Impact Assessment itself, another local resident (ID:PS628) was concerned about the lack of detail and felt that it was inadequate with regards to key sub areas, key settlements and missing sites that should be in the LPR.

³ Age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

⁴ CD10.

A few comments were received in relation to older people. McCarthy Stone (ID:PS564) noted that it thought that policy SP18 Housing Type and Mix should be amended to emphasise the importance of older people.

In relation to policy DM19 Specialised Housing, Croudace Homes (ID:PS1528) commented that there was no direction or clarity provided regarding the location, quantum or types of specialist housing for older people needs over the plan period. Similarly, Tim North & Associates (ID:PS1517, PS1518, PS521) commented that the Plan has not fully taken into account the fact that the population of older people in England is growing rapidly, with the consequence that ensuring future housing supply is met on the basis of “Lifetime Homes Standards” will not of itself be either suitable or capable in meeting the accommodation requirements of various types of specialist older households. It believes there is a need to adopt a more flexible approach towards specialist housing for older people such as encompassing specialist housing for older people as a category which exceptionally may be provided as a form of residential development in the countryside, in accordance with Policy DM1, subject to a quantitative and qualitative need being shown.

Another local resident (ID:PS965) commented in relation to policy RSA11 Former Sewage Treatment Works, Theale. She was concerned that due to the lack of pavements in Crown Lane and Blossom Lane, wheelchair and disability scooter users, prams, pushchairs, children cycling to school, pedestrians and equestrians are all currently forced onto the road to compete with oncoming traffic.

Habitat Regulations Assessment

Inspector:

The habitat regulations assessment⁵ finds that the Plan, in combination with other plans and projects, has the potential to have significant effects on the integrity of the River Lambourn, Kennet and Lambourn Floodplain, and Kennet Valley Alderwoods Special Areas of Conservation. However, the assessment concludes that those in-combination effects can be avoided through a combination of strategic and proposal-specific mitigation measures.

The Duty to Cooperate Statement⁶ advises that the approach to the habitats regulations assessment has been developed in conjunction with Natural England; they agreed with the Council's initial screening opinion; the final assessment document has been developed following that screening; and the Council has requested entering into a statement of common ground with Natural England.

PQ7. Which policies in the Plan contain the strategic and proposal-specific mitigation measures that will ensure that significant effects on the integrity of the River Lambourn, Kennet and Lambourn Floodplain, and Kennet Valley Alderwoods Special Areas of Conservation will be avoided?

Council response:

The importance of the SACs is highlighted within the LPR, specifically in the following policies:

- *Policy SP11 Biodiversity and Geodiversity*
- *Policy DM6 Water Quality*
- *Policy DM8 Air Quality*
- *RSA2 Land at Bath Road, Speen*
- *RSA5 Land at Lower Way, Thatcham*
- *RSA14 Land adjoining Lynch Lane, Lambourn*
- *RSA15 Land at Newbury Road, Lambourn*
- *RSA17 Land at Chieveley Glebe, Chieveley*
- *RSA19 Land west of Spring Meadows, Great Shefford*
- *RSA20 Land off Charlotte Close, Hermitage*
- *RSA21 Land to the south east of the Old Farmhouse, Hermitage clause*
- *RSA22 Land adjacent to Station Road, Hermitage*

⁵ CD8.

⁶ CD11

**PQ8. (a) Are there any significant outstanding concerns from Natural England (or other representors) about the habitat regulations assessment?
(b) If so, what are they and what is being done to resolve them?
(c) When is the statement of common ground with Natural England expected to be finalised?**

Council response:

No, there are no significant outstanding concerns from Natural England.

The Council received an email from Natural England on 10 March 2023 (to be added to examination library) confirming that there were no major issues to report to date, but should any issues be identified a response would be provided before the Plan was submitted. No additional comments were received.

As Natural England has not identified any concerns with the HRA, the Council no longer believes a SoCG is necessary.

Viability assessment

Inspector:

Local plans should be informed by a proportionate assessment of viability that takes into account all relevant policies, and local and national standards, including the cost implications of the Community Infrastructure Levy (CIL) and section 106. The assessment should demonstrate that the total cumulative cost of all relevant policies will not undermine deliverability⁷. The Plan is supported by viability evidence⁸.

PQ9. (a) Does the viability evidence make reasonable assumptions about the cost of meeting all of the policy requirements included in the Plan along with any other relevant national standards?

Does the viability evidence make reasonable assumptions about (b) the value of development, and (c) the price a willing landowner would be likely to sell their land for?

(d) Does the evidence indicate that the total cumulative cost of all relevant policies will not undermine the viability of the development that the Plan assumes will take place during the plan period?

Council response:

Yes, all the Council's viability evidence is set out in documents [VIA 1a](#), [b](#), [c](#), [di](#), [dii](#), [diii](#), [e](#) and [f](#) in the examination library.

PQ9 a) Yes. All the assumptions used are set out for each scenario and build type used to test the policies contained in the LPR. These are set out in detail in VIA 1b

PQ9b) Yes. The approach taken with regards establishing the value of development is set out in VIA 1 diii and VIA 1e.

PQ9c) Yes. VIA 1f provides details of residential and commercial property values and wider economic conditions at the time of the study that are West Berkshire specific.

PQ9d) Yes. Table G in VA1b provides an assessment of each policy on viability impact from Low/Marginal to High. Each of the high assessments is followed by a detailed comment such as "specific allowance made in addition to base build costs" the details of which are set out in VIA 1b Table B and also in Further Typology Sensitivity Testing for Stage 2 (update 2022) VIA 1b Table C.

⁷ PPG ID: 10 (2019).

⁸ VIA1a to VIA1f (Autumn 2022).

Climate change

Inspector:

Section 19(1A) of the 2004 Act requires development plan documents (taken as a whole) to include policies designed to secure that the development and use of land in the planning authority's area contributes to the mitigation of, and adaptation to, climate change.

PQ10. Which policies in the Plan are designed to secure that the development and use of land contributes to the mitigation of, and/or adaptation to, climate change?

Council response:

The principles of climate change adaptation and mitigation are embedded throughout the LPR, specifically Policy SP5 Responding to Climate Change, and supported by other policies within the LPR. These other policies include:

- *Policy SP1 – The Spatial Strategy*
- *Policy SP6 – Flood Risk*
- *Policy SP7 – Design Quality*
- *Policy SP9 – Historic Environment*
- *Policy SP10 – Green Infrastructure*
- *Policy SP11 – Biodiversity and Geodiversity*
- *Policy SP19 – Affordable Housing*
- *Policy SP23 - Transport*
- *Policy DM4 – Building Sustainable Homes and Businesses*
- *Policy DM5 – Environmental and Pollution Control*
- *Policy DM6 – Water Quality*
- *Policy DM7 – Water Resources and Waste Water*
- *Policy DM8 – Air Quality*
- *Policy DM15 – Trees, Woodland and Hedgerows*
- *Policy DM42 – Transport Infrastructure*
- *Policy DM44 - Parking*
- *Policy DM45 – Travel Planning*

In addition, each of the site-specific policies (RSA1-RSA23 and ESA1-ESA6) include the need for the design of the development on site to respond positively to the challenge of climate change and be designed for climate resilience, including maximising the efficient use of sustainable technologies, resources, materials and solar gain, in accordance with Policy SP5. The strategic site allocation policies (Policy SP16 and Policy SP17) also seek to respond positively to climate change, embedding the principles of climate change mitigation and adaptation into the new developments in accordance with Policy SP5.

Superseded policies

Inspector:

Regulation 8 parts (4) & (5) require that the policies in a local plan must be consistent with the adopted development plan unless the plan being examined contains a policy that is intended to supersede another policy in the adopted development plan and the plan states that fact and identifies the superseded policy.

Appendix 7 sets out a schedule of policies in the West Berkshire District Plan 1991-2006, the West Berkshire Core Strategy 2006-2026, and the Housing Site Allocations DPD 2006-2026 that will be superseded by policies in the Plan. However, at the end of Appendix 7 is a list of policies in the Housing Site Allocations DPD 2006-2026 that “have not been carried forward” as part of the Plan.

**PQ11. (a) How are each of the sites listed in Appendix 7 that “have not been carried forward” designated on the submission Policies Map⁹?
 (b) Which policies in the Plan are relevant to those designations?
 (c) Is it the intention that those site allocation policies that are not carried forward be superseded by policies in the Plan?**

Council response:

PQ11a) Each of the sites listed in Appendix 7 that have not been carried forward have not been shown on the submission Policies Map as these sites are to be deleted.

PQ11b) The sites listed in Appendix 7 that ‘have not been carried forward’ either have planning permission (under construction or complete) or are no longer considered to be deliverable. As such, these sites will now form part of the committed supply if they have planning permission or if they are no longer considered deliverable, the site is to be deleted, and this element of supply that was allocated through an existing HSA DPD will be superseded by other site allocations within the LPR in order to meet the housing requirement. Policy SP12 (including the proposed modifications identified through PQ14, PQ19 and PQ25) is therefore relevant these existing designations.

PQ11c) On reflection the Council consider that the HSA DPD site policies that are not to be retained as listed in Appendix 7 of the LPR will be superseded by Policy SP12 which makes clear that provision will be made for additional homes across the District and these homes will come from a range of sources, including site allocations and existing commitments.

The Council propose a modification to Appendix 7 to remove the text from under the table in the appendix and insert the list of policies into the ‘superseded Housing Site

⁹ CD2.

Allocations DPD 2006-2026 Policy' column adjacent to Policy SP12, as indicated below.

~~The following site allocation policies from both the West Berkshire Core Strategy 2006-2026 and the Housing Site Allocations DPD 2006-2026 have not been carried forward as part of the LPR as they have either been built out or are nearing completion.~~

- ~~• CS2 Newbury Racecourse strategic site allocation~~
- ~~• HSA7 St Gabriels Farm, The Ridge, Cold Ash~~
- ~~• HSA8 Land to the east of Sulham Hill, Tilehurst~~
- ~~• HSA10 Stonehams Farm, Tilehurst~~
- ~~• HSA12 Bath Road, Calcot~~
- ~~• HSA17 Land to the north of the A4, Woolhampton~~
- ~~• HSA18 Salisbury Road, Hungerford~~
- ~~• HSA21 Land north of Pangbourne Hill, Pangbourne~~
- ~~• HSA22 Stretton Close, Bradfield Southend~~
- ~~• HSA26 Land east of Laylands Green, Kintbury~~

~~The following site allocation policies from the Housing Site Allocations DPD 2006-2026 have not been carried forward as part of the LPR because they are not considered deliverable at this time:~~

- ~~HSA6 Poplar Farm, Cold Ash~~
- ~~HSA16 The Hollies, Burghfield Common~~

Local Plan Review Policy	Superseded West Berkshire District Local Plan 1991-2006 Policy	Superseded West Berkshire Core Strategy 2006-2025 Policy	Superseded Housing Site Allocations DPD 2006-2026 Policy
SP12 Approach to Housing Delivery	-	CS1 Delivering new homes and retaining the housing stock	<u>CS2 Newbury Racecourse strategic site allocation</u> <u>HSA6 Poplar Farm, Cold Ash</u> <u>HSA7 St Gabriels Farm, The Ridge, Cold Ash</u> <u>HSA8 Land to the east of Sulham Hill, Tilehurst</u> <u>HSA10 Stonehams Farm, Tilehurst</u> <u>HSA12 Bath Road, Calcot</u>

Local Plan Review Policy	Superseded West Berkshire District Local Plan 1991-2006 Policy	Superseded West Berkshire Core Strategy 2006-2025 Policy	Superseded Housing Site Allocations DPD 2006-2026 Policy
			<p><u>HSA16 The Hollies, Burghfield Common</u> <u>HSA17 Land to the north of the A4, Woolhampton</u> <u>HSA18 Salisbury Road, Hungerford</u> <u>HSA21 Land north of Pangbourne Hill, Pangbourne</u> <u>HSA22 Stretton Close, Bradfield Southend</u> <u>HSA26 Land east of Laylands Green, Kintbury</u></p>

Strategic priorities

Inspector:

Local planning authorities must identify the strategic priorities for the development and use of land in their area¹⁰.

PQ12. What are the Council's strategic priorities for the development and use of land in West Berkshire?

Council response:

The Council's strategic priorities for the development and use of land are set out in the Vision and Strategic Objectives contained within Chapter 3 of the Proposed Submission Local Plan Review 2022-2039 ([CD1](#)).

Para 1.26 of CD1 sets out the structure of the Local Plan Review (LPR) and as part of that makes clear that the LPR includes a vision, strategic objectives and a set of policies which together provide a policy framework for assessing planning applications and guiding development across West Berkshire.

As part of the LPR Scoping Report (Feb 2018) ([CD12](#)) a review was undertaken of the existing Core Strategy Strategic Objectives. Following a review of the consultation, published in the LPR Scoping Report Consultation Statement ([CD14](#)), these were then finalised and published as part of the LPR Regulation 18 consultation in November 2018 ([C15](#)).

The Strategic Objectives represent the key delivery outcomes that the LPR should achieve, against which its success will be measured. The Development Strategy sets out the overall approach for managing growth and change across the District over the plan period and outlines our place based approach. Strategic policies, fundamental to achieving the vision and strategic objectives, then set out the overarching principles for development.

¹⁰ Section 19(1B) of the 2004 Act.

Strategic policies

Inspector:

Plans must include, and explicitly identify, strategic policies to address the strategic priorities for the development and use of land in their area having regard to national policy and guidance relating to the purpose and nature of strategic and non-strategic policies¹¹.

The Plan contains 24 strategic policies. These vary in their purpose and nature, some relating to specific geographic areas and others to thematic issues.

Neighbourhood plans will be required to be in general conformity with the strategic policies in the Plan once it is adopted.

PQ13. Do each of the policies SP1 to SP24 meet the criteria for strategic policies set out in national policy and guidance?

Council response:

Yes, Paragraph 20 of the NPPF sets out that:

*'Strategic policies should set out an overall strategy for the pattern (**Policies SP1, SP3 and SP4**), scale [**Policies SP2 and SP12**] and design quality of places [**Policy SP7**], and make sufficient provision for:*

- a) housing (including affordable housing [**Policies SP13, SP14, SP15, SP16, SP17, SP18, SP19**], employment [**Policies SP20 and SP21**], retail, leisure and other commercial development [**Policy SP22**];*
- b) infrastructure for transport [**Policy SP23**], telecommunications, security, waste management, water supply, wastewater, flood risk...; [**Policy SP6**]*
- c) community facilities (such as health, education and cultural infrastructure) [**Policy SP24**]; and*
- d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure [**Policies SP8, SP9, SP10 and SP11**], and planning measures to address climate change mitigation and adaptation. [**Policy SP5**]'*

In accordance with paragraph 21 of the NPPF they are necessary to address the strategic priorities of West Berkshire (and any relevant cross boundary issues) and provide a clear starting point and framework for the non-strategic DM policies. They do not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.

¹¹ NPPF 17 to 23 and 28, and PPG ID-41-076-20190509.

Paragraph 1.26 of the Proposed Submission Local Plan Review 2022-2039 ([CD1](#)) makes clear that the strategic policies set out the overarching principles for development focusing on:

- *Our place based approach*
- *Our environment and surroundings*
- *Delivering housing*
- *Fostering economic growth and supporting local communities*

It also makes clear that the strategic policies are considered fundamental to achieving the Plan's Vision and Strategic Objectives.

In accordance with paragraph 22 of the NPPF they will look ahead over a minimum 15 year period from adoption and anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure. The strategic site allocations at Sandford (Policy SP16) and North East Thatcham (Policy SP17) are set within the West Berkshire Strategic Vision 2050 ([SET3a](#)) that looks further ahead as required by the NPPF.

Although the Council believes that all of the policies meet the criteria for strategic policies, it acknowledges that there is unnecessary duplication within some of these. This is addressed in the Council's response to PQ14.

Inspector:

Strategic policies SP13 to SP15 list sites allocated for residential development in different parts of the District, and SP21 lists sites allocated for employment development. Chapter 8 of the Plan is entitled "Non-strategic site allocations", and contains policies for the sites listed in SP13 to SP15 and SP21 (other than the two strategic sites subject to policies SP16 and SP17).

**PQ14. (a) What is the purpose of policies SP13 to SP15 and SP21?
(b) Do those policies create ambiguity as to whether the allocations listed within them are subject to a strategic policy that a neighbourhood plan would need to be in general conformity with?**

Council response:

PQ14a) The purpose of the policies is to set out the level and location of development that will come forward within each spatial area to help meet the identified housing and employment land requirements.

PQ14b) Yes, upon reflection it is accepted that there is unnecessary duplication within these policies.

To overcome this, the Council would like to propose the following Main Modifications:

- *Policy SP12: inclusion of additional text to explain how the housing requirement will be met.*
- *Policy SP12: inclusion of additional text to set out the level of development that will need to be met through allocations in the Hungerford and Lambourn NDPs. Additional text also makes clear that the Council will address any shortfall if the NDPs are not adopted within two years of the adoption of the LPR.*
- *Supporting text to Policy SP12: inclusion of additional text to make clear that the allocations within the NDPs are in addition to allocations within neighbourhood plans.*
- *Table 2 within the supporting text to policy SP12: table revised to make clear the contribution from each source of supply.*
- *Policy SP20: inclusion of additional text to make clear that the site allocations, as well as promoting the supply of employment land, will contribute to the supply to meet the identified need.*
- *Policy SP20: inclusion of text to make clear that sites can also be allocated within subsequent NDP's, and to make clear that all DEA's are listed in Appendix 4.*
- *Supporting text to Policy SP20: amendments to remove reference to Policy SP21; inclusion of text in relation to NDP's; inclusion of text relating to DEA's and the Greenham Business Park LDO that was previously part of the Policy SP21 supporting text.*
- *Policies SP13 to 15 and SP21: deletion of policies and remove references to these policies throughout LPR.*
- *Supporting text within Chapter 8 (non-strategic site allocations: our place-based approach): inclusion of tables and additional text to show the allocations that will come forward within each spatial area to help meet the housing and employment land requirements.*

The proposed Main Modifications to Policy SP12, Policy SP20 and Chapter 8 are set out below. It should be noted that the response to PQ19 and PQ25 also proposes some Main Modifications and these are also included below:

Proposed modifications to policy SP12

Policy SP12

Approach to Housing Delivery

Provision will be made for ~~8,721 to 9,146~~ 9,747 to 10,222 net additional homes in West Berkshire for the period 1 April 2022 to 31 March ~~2039~~ 2041; 513 to 538 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development.

New homes will be located in accordance with Policy SP1: Spatial Strategy, Policy SP3: Settlement hierarchy and Policy DM1: Development in the Countryside.

There should be no net losses from the existing stock of homes in West Berkshire. Existing homes should be retained in residential use (or replaced at least in equal

numbers, normally on the proposed site), unless there is a reasoned justification in the form of a benefit to the wider community for a change of use. Developments should utilise opportunities to make better use of the existing housing stock.

To meet the housing requirement, the following sources will ensure a continuous supply of land for housing across the Plan period:

- *Local Plan retained allocations;*
- *Local Plan allocations not being retained due to site being at an advanced stage of construction;*
- *Stratfield Mortimer Neighbourhood Development Plan (NDP) allocation;*
- *Existing planning commitments on unallocated sites;*
- *Existing planning commitments for C2 Use Class communal accommodation;*
- *Small site windfall allowance;*
- *New allocations within the LPR as set out in the non-strategic site allocations; and*
- *Sites to be allocated within neighbourhood plans as set out below.*

Sites to be allocated in Neighbourhood Plans

The Council will supply a housing requirement figure to those qualifying bodies either preparing or updating a neighbourhood plan that intends to include residential allocations.

Any sites allocated through the neighbourhood planning process will be in addition to sites allocated within this LPR.

For those plans currently in preparation, it will be necessary to identify sites to meet the following levels of development:

- *Hungerford: approx. 50 dwellings*
- *Lambourn: approx. 25 dwellings*

Supporting Text

Housing need and the housing requirement

6.1. The NPPF states that...

6.9. In order to support the government's objective of significantly boosting the supply of homes, which is set out in the NPPF, Policy SP12 expresses the housing requirement as a range, with a minimum requirement of 513 dwellings per annum meeting the 2022 LHN. The upper end of the range allows for approximately 5% additional homes (rounded to 538) on top of the 2022 LHN. *The upper end of the range is the target figure.*

Meeting the housing requirement

Retained Local Plan and Stratfield Mortimer NDP allocations:

6.12. The plan period of the LPR (2022 – ~~2039~~ 2041) overlaps with the previous plan period (2006 – 2026) and account therefore needs to be taken of sites that have already been allocated in the adopted Core Strategy, the adopted HSA DPD and the adopted Stratfield Mortimer NDP.

6.14. The policies for the ~~Allocated sites that are retained~~ allocations are listed in Policies SP13-15 included in Chapter 8.

Existing planning commitments on unallocated sites:

6.16. Existing permissions for housing on non-allocated sites will also contribute to supply. Over ~~1,958~~ 2,118 units on windfall sites, those not specifically identified in the development plan, already had permission or prior approval for permitted development at 31 March 2022.

Existing planning commitments for communal accommodation (Use Class C2):

6.18. At 31 March 2022, there are were existing permissions for residential institutions in Use Class C2 which equate to 57 units.

Windfall

6.20. The Council has assessed the contribution likely to be made from windfall sites based on past trends. It is clear that windfall sites have consistently played an important role in the housing supply of the District: approximately 74% of completions in the period 2006 - 2022 were on unallocated, windfall sites. The windfall allowance, of 140 dwellings per annum is, in comparison, relatively modest. It has been based on the average annual delivery on small sites of less than 10 units over the existing plan period 2006 – 2022. The calculated allowance set out in Table 2 takes account of existing small permissions that are already included in the supply by deducting these from the allowance of 140 dpa over the period 2022 to ~~2039~~ 2041....

Housing supply at ~~March 2022~~

6.21. Part 1 of Table 2 shows the committed supply position at 31 March 2022. 31 March 2022 is the date when the annual monitoring of development progress takes place. As aforementioned, for the purposes of calculating the housing supply, if a site has planning permission, then the number of dwellings permitted, or already built, has been taken into account in the table.

Table 2: ~~Housing supply at March 2022~~

Supply category	Net outstanding units
1. Committed supply at 31 March 2022	
Local Plan retained allocations	
• Core Strategy: Sandford Park Strategic Site	1,580
• Housing Site Allocations DPD Sites	990
Subtotal	2,570
Neighbourhood Development Plan allocation	
• Stratfield Mortimer NDP Site	82
Subtotal	2,652
Local Plan allocations not being retained (due to site being at an advanced stage of construction)	
• Core Strategy: Newbury Racecourse	465
• HSA DPD Sites	256

Supply category	Net outstanding units
Subtotal	721
Existing planning commitments on unallocated sites	1,958 2,118
Existing planning commitments for C2 Use Class communal accommodation	57
Small site Wwindfall allowance to 2039 2041	1,949 2,229
Total committed supply	7,337 7,777
2. Future supply	
New allocations within the LPR	1,720
Sites to be allocated in Neighbourhood Development Plans	
• <u>Hungerford</u>	<u>55</u>
• <u>Lambourn</u>	<u>25</u>
Subtotal	80
Total future supply	1,800
Total housing supply	9,577

Future Supply

6.21. 6.22. In order to meet the target of 538 new dwellings per annum over the plan period, sites for a further 2,445 dwellings need to be found (requirement of 10,222 minus committed supply of 7,777). Part 2 of Table 2 shows that allocations will be identified to accommodate 80 dwellings within the NDPs for Hungerford and Lambourn. This leaves a remaining 2,365 dwellings to be identified through new allocations in the LPR.

6.23 There also needs to be some built in flexibility to allow for phasing issues and for an element of non-delivery. The expression of the requirement as a range and the use of a relatively modest windfall allowance both add to the flexibility required to ensure that targets can be met.

New sites allocated in the LPR

6.22. 6.24. The Council's overall approach to identifying land for allocation is set out in Policy SP1 and in Policy SP3. Assessment of the availability, suitability and viability of individual sites has taken place through the Housing and Economic Land Availability Assessment (HELAA) and further technical and sustainability assessments have been undertaken. Sites proposed for allocation are detailed in Policies SP13–15 SP16 and SP17, as well as Policies RSA1 to RSA23, and these include provide additional housing supply on newly allocated sites of some 1,720 homes. This figure of 1,720 includes the strategic allocation at North East Thatcham for approximately 1,500 homes within the plan period.

Sites to be allocated in Neighbourhood Plans

6.23. 6.25. The NPPF requires that within the housing requirement for the whole area, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

6.26. Should any qualifying body decide to prepare a neighbourhood plan that includes residential allocations or update an adopted neighbourhood plan to include residential allocations, then the Council will supply a housing requirement figure. The

policy makes clear that allocations made through neighbourhood plans will be in addition to the homes being allocated within the LPR and the other sources of supply identified in the policy.

6.26. Any potential sites within defined settlement boundaries will not qualify towards the targets outlined in the policy. This is because there is a presumption in favour of development within settlement boundaries.

6.256.27. A number of neighbourhood plans are in preparation within the district. It is not compulsory for neighbourhood plans to include allocations, and only two which neighbourhood plans will allocate further sites for housing development. It is proposed that a further 80 dwellings will be allocated by local communities through their the neighbourhood plans for Hungerford and Lambourn. The figures for individual neighbourhood areas are set out in Policies SP13 – 15. The delivery of these neighbourhood plans will be monitored by the Council to ensure the housing requirement is met. The Council reserves the right to identify opportunities to address any shortfall if the Hungerford and Lambourn neighbourhood plans are not adopted within two years of the adoption of the LPR.

Proposed modifications to Policy SP20

Policy SP20 Strategic approach to employment land

Through the LPR the Council will seek to facilitate the growth and forecasted change of business development over the plan period through site allocations and by promoting the supply of office and industrial space across the District to the meet the identified shortfall.

Appropriate proposals for business development (offices, industrial and storage and distribution) will be supported where they are located:

- a) On sites allocated for business development as set out Policy SP21 and in accordance with the individual site specific policy (ESA1 – ESA6) in this Plan or any subsequent neighbourhood plans; or
- b) On a suitable site within a settlement boundary; or
- c) Within a Designated Employment Area (DEA) in accordance with Policy DM32, and as listed in Appendix 4 and as defined on the Policies Map; or
- d) On previously developed land within existing suitably located employment sites; or
- e) Within the countryside provided the proposal is in accordance with other relevant policies within the Plan, in particular Policy DM35.

Proposals for

Supporting text

....

7.9 *Policy SP21 Chapter 8 sets out a number of site allocations for industrial land,*

.....

New para 7.10 Any sites allocated through the neighbourhood planning process will be in addition to those sites allocated within this Plan and/or existing planning commitments within the neighbourhood planning area.

7.10 *7.11 The ELR is clear that the industrial requirement....*

7.14 *As a result the ELR recommends safeguarding existing employment sites. West Berkshire has a number of designated employment areas (DEA) which are specific locations across the District designated for business uses/development providing a range of sites and locations to promote sustainable economic growth. Those areas known as Protected Employment Areas (PEAs) are renamed Designated Employment Areas (DEAs) through this LPR. All DEAs are listed in Appendix 4 and defined on the Policies Map. The District's DEAs contribute significantly to the supply of employment land and provide opportunities for regeneration and intensification and therefore Policy DM32 seeks to safeguard these areas to protect and strengthen their function and integrity.*

7.15 *The Council will support appropriate proposals for offices.....*

New para 7.16 Greenham Business Park has a Local Development Order in place across the site. This sets our development parameters by which certain schemes can proceed without planning permission. Proposals which are outside of the scope of the Local Development Order and require planning permission shall be determined in accordance with the relevant LPR policies.

7.16 *7.17 The District has a vast rural area.....*

Proposed modification to Chapter 8

Chapter 8 Non strategic site allocations: our place based approach

8.1. *This section contains policies for the non-strategic site allocations (residential, mixed use and employment). A significant number of the residential sites are already allocated, carried over from the HSADPD. Not all the HSADPD sites have been included; those where development has been completed or is close to completion have been excluded as there is no need for an allocation in the LPR.*

8.2. *For each policy, the site allocation is identified on the indicative site map. The area shown on the map is the gross site area. The approximate number of dwellings for each site have been calculated using the West Berkshire Density Pattern Book Study (2019), unless the site promoter has suggested a development potential that is lower. The actual numbers achieved on any site may vary slightly depending on the detailed design work carried out in preparation for a planning application and will be influenced by the topography and other specific site characteristics. Final densities will depend on the housing type and mix. Approximate numbers are therefore given in the site policies to enable some flexibility at the more detailed design stage.*

Sites allocated for residential development: Newbury and Thatcham

8.3. the main focus for growth in West Berkshire is the Newbury and Thatcham area, where two strategic urban extensions are proposed; the first, the existing Core Strategy allocation at Sandford Park, south of Newbury, which is carried forward with a redefined policy boundary where approximately 1,500 homes could be developed; and the second, another greenfield site, to the north east of Thatcham for approximately 1,500 homes. These two sites are allocated under Policies SP16 and SP17, with the remainder of the growth in the Newbury and Thatcham area comes through smaller site allocations set out below.

8.4 There is significant potential on previously developed land within settlement boundaries, particularly in Newbury town centre and periphery. Sites within settlement boundaries are not being allocated. This is because settlement boundaries are a long-established planning tool. They identify the main built up area of a settlement within which development is considered acceptable in principle, subject to other policy considerations.

<u>Policy</u>	<u>Allocation</u>	<u>Approximate numbers</u>
<u>RSA1</u>	<u>Land north of Newbury College, Monks Lane, Newbury (Site ref HSA 1)</u>	<u>15 dwellings</u>
<u>RSA2</u>	<u>Land at Bath Road, Speen</u>	<u>100 dwellings</u>
<u>RSA3</u>	<u>Land at Coley Farm, Stoney Lane, Newbury (Site Ref: HSA 3)</u>	<u>75 dwellings</u>
<u>RSA4</u>	<u>Land off Greenham Road, South East Newbury (Site Refs: HSA 4)</u>	<u>160 dwellings</u>
<u>RSA5</u>	<u>Land at Lower Way, Thatcham (Site Ref: THA025)</u>	<u>85 dwellings</u>
<u>RSA25</u>	<u>Long Copse Farm, Enborne</u>	<u>24 plots</u>

Policy RSA1

Sites allocated for residential development: Eastern Area

8.5. In the Eastern Area the significant constraints to development mean provision for new development is more limited. Constraints include the Detailed Emergency Planning Zone (DEPZ) of Atomic Weapons Establishment (AWE) Aldermaston and AWE Burghfield. The DEPZ was defined following changes to legislation in 2019 (Radiation (Emergency Planning Preparedness and Public Information) Regulations 2019) which resulted in the redetermination of the emergency planning arrangements around AWE Aldermaston and AWE Burghfield in 2020. Given the constraints in this spatial area the LPR does not propose any strategic allocations, but non-strategic allocations are proposed on the edge of existing settlements as set out below.

8.6. Land adjacent to New Stocks Farm (Policy RSA24), which is located within the DEPZ of AWE Aldermaston, is already in use for Gypsy and Traveller accommodation (transit site). The allocation of the site for eight permanent pitches was not considered to have an impact upon the emergency plan.

8.7. Land adjoining Pondhouse Farm, Burghfield (Policy RSA12), which is located within the DEPZ of AWE Burghfield, was granted outline planning permission in

December 2019. When the DEPZ was reconsidered in 2020, the 100 units proposed were included in the detailed calculations undertaken by Emergency Planning.

8.8. If in the future the DEPZ is reviewed and the emergency planning arrangements be amended, then future reviews of the Local Plan will consider whether further allocations in this area would be suitable.

<u>Policy</u>	<u>Allocation</u>	<u>Approximate numbers</u>
<u>RSA6</u>	<u>Stoneham's Farm, Long Lane, Tilehurst (Site Ref: HSA 9)</u>	<u>65 bedspace care home</u>
<u>RSA7</u>	<u>72 Purley Rise, Purley on Thames (Site Ref HSA 11)</u>	<u>35 dwellings</u>
<u>RSA8</u>	<u>Land adjacent to Bath Road and Dorking Way, Calcot (Site Ref HSA 13)</u>	<u>35 dwellings</u>
<u>RSA9</u>	<u>Land between A340 and The Green, Theale (Site Ref: HSA 14)</u>	<u>100 dwellings</u>
<u>RSA10</u>	<u>Whitehart Meadow, Theale (Site Ref THE1)</u>	<u>40 dwellings</u>
<u>RSA11</u>	<u>Former Theale Sewage Treatment Works, Theale (Site Ref THE7)</u>	<u>60 dwellings</u>
<u>RSA12</u>	<u>Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common (Site Ref: HSA15)</u>	<u>100 dwellings</u>
<u>RSA13</u>	<u>Land north of A4 Bath Road, Woolhampton (Site Ref MID4)</u>	<u>16 dwellings</u>
<u>RSA24</u>	<u>New Stocks Farm, Paices Hill, Aldermaston</u>	<u>8 pitches</u>

Policy RSA6.....

Sites allocated for residential development: North Wessex Downs AONB

8.9. The special characteristics of the North Wessex Downs AONB mean that development will be modest, helping to meet local needs, support the rural economy and sustain local facilities in accordance with Policy SP2.

<u>Policy</u>	<u>Allocation</u>	<u>Approximate numbers</u>
<u>RSA14</u>	<u>Land adjoining Lynch Lane, Lambourn (Site Ref: HSA 19)</u>	<u>Approximately 60 dwellings</u>
<u>RSA15</u>	<u>Land at Newbury Road, Lambourn (Site Ref: HSA 20)</u>	<u>Approximately 5 dwellings</u>
<u>RSA16</u>	<u>Land North of Southend Road, Bradfield Southend (Site Ref: BRAD5)</u>	<u>Approximately 20 dwellings</u>
<u>RSA17</u>	<u>Land at Chieveley Glebe, Chieveley (Site Ref: CHI23)</u>	<u>Approximately 15 dwellings</u>
<u>RSA18</u>	<u>Pirbright Institute Site, High Street, Compton (Site Ref: HSA 22)</u>	<u>Approximately 140 dwellings</u>
<u>RSA19</u>	<u>Land west of Spring Meadows, Great Shefford (Site Ref: GS1)</u>	<u>Approximately 15 dwellings</u>
<u>RSA20</u>	<u>Land off Charlotte Close, Hermitage (Site Ref: HSA 24)</u>	<u>Approximately 15 dwellings</u>

<u>Policy</u>	<u>Allocation</u>	<u>Approximate numbers</u>
<u>RSA21</u>	<u>Land to the south east of the Old Farmhouse, Hermitage (Site Ref HSA 25)</u>	<u>Approximately 10 dwellings</u>
<u>RSA22</u>	<u>Land adjacent Station Road, Hermitage</u>	<u>Approximately 34 dwellings</u>
<u>RSA23</u>	<u>Land adjoining The Haven, Kintbury (Site Ref: KIN6)</u>	<u>Approximately 20 dwellings</u>

Policy RSA14....

Sites allocated for employment land

8.10 Policies for the employment site allocations are set out below. The following sites will be allocated to facilitate the growth and forecasted change in industrial land over the plan period to 2039:

Table X:

<u>Policy Ref:</u>	<u>Site Name:</u>	<u>Approximate floorspace (sqm)</u>	<u>Use</u>
<u>ESA1</u>	<u>Land east of Colthrop Industrial Estate, Thatcham</u>	<u>20,400</u>	<u>B2/B8</u>
<u>ESA2</u>	<u>Land west of Ramsbury Road, Membury Industrial Estate</u>	<u>10,381</u>	<u>B2/B8</u>
<u>ESA3</u>	<u>Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands</u>	<u>5,200</u>	<u>Egiii/B2</u>
<u>ESA4</u>	<u>Beenham Landfill, Pips Way, Beenham</u>	<u>14,000</u>	<u>B2/B8</u>
<u>ESA5</u>	<u>Northway Porsche, Grange Lane, Beenham</u>	<u>6,400</u>	<u>Egiii/B2</u>
<u>ESA6</u>	<u>Land adjacent to Padworth IWMF, Padworth Lane</u>	<u>12,400</u>	<u>B2/B8</u>

811 The Council will seek to ensure that sufficient sites are provided in the right locations to foster sustainable economic growth. The allocated sites are focused around or near to areas of existing employment activity, and mainly adjacent to defined Designated Employment Areas. Those sites allocated on land adjacent to a DEA, will, through this LPR, now form part of that DEA.

Thatcham

8.12 Thatcham's main industrial area is Colthrop Estate, comprising a mix of larger distribution units and smaller workshops, and is described in the ELR as 'the District's premier logistics and distribution park'. There are some vacancies in the office stock, and a very high occupancy in the industrial and warehousing stock. The allocated site to the east of the Colthrop Estate (ESA1) is a logical extension and would aid in meeting the identified need in the Urban Area of Thatcham.

Membury Industrial Estate

8.13 The ELR outlines that to support the creation of local job opportunities in the more western rural areas, DEA boundaries could be extended at Membury Industrial Estate. Membury has seen a number of redevelopments and expansions, including outline planning permission granted for industrial use on one of the two proposed allocated sites (ESA2). The allocated sites at Membury (ESA2 and ESA3) and extending the DEA boundary will aid in addressing a local and rural demand.

Beenham

8.14 Beenham Grange Industrial Area is largely occupied by industrial operators, with a mix of locally based companies and larger companies servicing the area. At the time of the ELR there were no available industrial units, reflecting the nature of the industrial market in this location. The sites allocated in this area (ESA4, ESA5 and ESA6) would aid in meeting the identified need towards the east of the District. The site at Northway Porsche would encourage light industrial units, compatible with surrounding uses. The site at Padworth sidings, whilst it is not directly adjacent to a DEA, it would make use of brownfield land and is adjacent to the Padworth Household Waste Recycling Centre.

8.15 For each site policy (ESA1-ESA6), the site allocation is identified on the indicative site map. The area shown on the map is the gross site area. The policies provide approximate floor space for development, based on standard plot ratios as set out within the HELAA, unless the site promoter has suggested a development potential that is lower than that calculated. The actual floorspace achieved may vary slightly depending on the detailed design work carried out in preparation for a planning application and will be influenced by the topography and other specific site characteristics.

Policy ESA1

Neighbourhood plans

Inspector:

Paragraph 1.14 in the Plan refers to two made neighbourhood plans: Stratfield Mortimer (2017) and Compton (2022). Policies SP13 to SP15 refer to seven other designated neighbourhood areas: Cold Ash; Newbury; Burghfield; Tilehurst; Hermitage; Hungerford and Lambourn.

PQ15. (a) What is the expected timetable for the preparation of neighbourhood plans in each of the designated neighbourhood areas in the District? (b) Please provide a map of the District indicating the locations of each of the designated neighbourhood areas.

Council response:

PQ15a) As at September 2023, the expected timetables are as follows:

Neighbourhood Area	Progress at September 2023
<i>Burghfield</i>	<i>The Neighbourhood Development Plan (NDP) Steering Group have advised that the draft plan has been submitted to Burghfield Parish Council so that they can run the Regulation 14 pre-submission consultation. The dates of the consultation are still to be determined. Submission of plan to West Berkshire District Council (WBDC) could take place at the end of 2023, with examination early 2024.</i>
<i>Cold Ash</i>	<i>The plan was submitted to WBDC on 20 June 2023, and the consultation on the submitted NDP (Regulation 16) has taken place between 21 July and 1 September 2023. At a meeting of Council on 5 October 2023, Members will be asked to agree that the NDP can proceed to independent examination.</i>
<i>Compton</i>	<i>The plan was adopted in February 2022. Compton Parish Council currently have no plans to review and update the plan.</i>
<i>Hermitage</i>	<i>The plan was submitted to WBDC on 17 February 2023, and there was a delay in the progression of the plan due to the election purdah period and resourcing issues within the Planning Policy Team. The consultation on the submitted NDP (Regulation 16) has taken place between 21 July and 1 September 2023. At a meeting of Council on 5 October 2023, members will be asked to agree that the NDP can proceed to independent examination.</i>
<i>Hungerford</i>	<i>Site selection work is currently underway. The steering group may request a Strategic Environmental assessment (SEA) / Habitat Regulation Assessment (HRA) screening in the next 6 months. The intention of the steering group has been to finalise the draft plan after the adoption of the Local Plan Review, ie. after September 2024.</i>
<i>Lambourn</i>	<i>The SEA/HRA screening opinion has been prepared which concludes that both a Strategic Environmental Assessment (SEA) and Habitats Regulations Assessment (HRA) will be required due to the potential</i>

Neighbourhood Area	Progress at September 2023
	<i>impact that residential allocations could have on the River Lambourn Special Area of Conservation and other environmental designations. The steering group are currently working on the evidence base and policy writing. Potential for the Regulation 14 pre-submission consultation towards the end of 2023, with submission and examination in 2024.</i>
<i>Stratfield Mortimer</i>	<i>The plan was adopted in June 2017, and a single issue update of the plan is in progress which is proposing to modify the uses on the land that was originally set aside for an infant school and GP surgery as part of the allocation for 110 dwellings. Outdoor sport and play for the school is now proposed, alongside a dentist with the remainder of the land being kept reserved for a possible future GP surgery. The steering group are of the view that the update is a material modification that would not change the nature of the plan. Such updates require a Reg 14 pre-submission consultation, Reg 16 publication consultation, and examination. Referendum is only needed if the examiner decides that the modifications change the nature of the plan. Submission likely later in 2023 with examination in 2024.</i>
<i>Tilehurst</i>	<i>The Regulation 14 pre-submission consultation took place between September and October 2022, and WBDC raised concerns that some policies did not meet the Basic Conditions. The steering group have subsequently reviewed and updated the NDP. Officers informally reviewed the revised plan in summer 2023 and had only minor comments to make. Submission likely later in 2023, with examination in 2024.</i>

PQ15b) A map is attached in Annex 1

Inspector:

National policy requires strategic policies to set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations¹².

Policies SP13 to SP15 includes a zero requirement figure for all of the designated neighbourhood areas currently without a made neighbourhood plan other than Hungerford and Lambourn which have figures of 55 and 25 respectively.

PQ16. Please clarify how the housing requirement figure for each of the designated neighbourhood areas reflects the overall strategy for the pattern and scale of development and any relevant allocations.

Council response:

¹² NPPF 66

The housing requirement for each of the designated Neighbourhood Areas has been based on the available development opportunities identified within the 2020 Housing and Economic Land Availability Assessment (HELAA). Consideration was also given to the placing of settlements within the settlement hierarchy. The table in Annex 2 provides further explanation of how the housing requirement was identified for each designated Neighbourhood Area.

Key Diagram

Inspector:

National policy expects local plans to indicate broad locations for development on a key diagram¹³.

PQ17. Does the Plan include a key diagram? If not, what is the justification?

Council response:

The Plan does not include a key diagram, and therefore the Council proposes that one is included via a modification to the Plan. See Annex 3.

¹³ NPPF 23.

References to guidance and other documents

Inspector:

Various policies in the Plan refer to guidance and other documents that do not form part of the statutory development plan. The way such documents are referred to varies. For example, policy DM44 requires cycle and motorcycle parking to “be provided in accordance with” a Council document; a document relating to Electric Vehicle Charging Points to be “taken into account”; and the design and layout of parking spaces to “follow” the Council’s highways design guide. Whilst such documents may be material planning considerations, it is unlikely that a policy in the Plan requiring development to “comply with” or “be in accordance with” such documents could be justified. A more appropriate phrase may be for development to “have regard to” such documents.

PQ18. Please identify all the references in Plan policies to documents that do not form part of the statutory development plan. Where necessary, potential modifications to the policy wording should be drafted to ensure that the policy is justified in terms of the weight it requires decision makers to give to such documents.

Council response:

The evidence base has been used to inform the policies. Guidance and other documents have been listed to signpost the users of each policy to such guidance and documents, which are important in informing developments and in decision making. Members of the Council feel strongly about the requirement for applicants to follow the requirements and guidance set out in the guidance and documents noted. As the Inspector has set out these are material considerations. When considering planning applications the policy is the starting point, and officers and consultees will assess the requirements of that policy on a case-by-case basis. There is much concern that changing the phrase to ‘have regard to’ could downgrade the importance of meeting the guidance. Applicants could inform the Council they have looked at the guidance, and therefore have complied with policy, without actioning what is required in those documents.

Strategic Policies

SP7 Design Quality – ‘Development proposals will be expected to show how they have responded positively to both national and local design guidance. At a national level this includes the characteristics of a well-designed place as set out in the National Design Guide (2021)’. The policy does not require compliance but a demonstration that such national guidance has been considered in drawing up the development. No modification is therefore considered necessary.

SP8 Landscape character – ‘Development should be demonstrably informed by and respond positively to the evaluation of the distinctive character areas set out in the

West Berkshire Landscape Character Assessments (2019) ([LAN1 - 8](#)) and other relevant landscape character assessments'. Landscape Character Assessments are an important part of the evidence base, and this technical work has been used to inform the policy. Therefore, proposed development does need to be informed by such evidence, and they also help the interested parties in understanding the landscape and its context. No modification is therefore considered necessary.

SP9 Historic Environment – In the context of enabling development criterion iv) states 'it meets the tests and criteria set out in Historic England guidance GPA4: Enabling Development and Heritage Assets'. As outlined in the response to question 49 it is proposed to delete reference to enabling development in the policy.

SP9 Historic Environment – Last paragraph states 'Proposals for development will be informed by and respond to: m) the West Berkshire Historic Environment Record; o) the Newbury Historic Character Study and Conservation Area Appraisals; and p) the West Berkshire Historic Action Plan (HEAP)'. The wording is equivalent to 'have regard to', as the documents referenced above are useful documents for interested parties to understand the historical context of the site. No modification is therefore considered necessary.

SP17 North-East Thatcham. The policy states that the Thatcham Strategic Growth Study ([SIT2a](#), [SIT2b](#), [SIT2c](#)) provides guiding principles for the delivery of the site, and therefore the proposals will demonstrate that the guiding principles have been positively responded to'. It is proposed to change this to: 'The Thatcham Strategic Growth Study provides guiding principles for the delivery of the site ~~therefore the proposals will demonstrate that the guiding principles have been positively responded to~~'. The development shall therefore have regard to this Study and demonstrate how such principles have guided development in a positive manner'.

SP17 North East Thatcham. The policy requires a Landscape and Visual Impact Assessment (LVIA), 'which will be informed by the Landscape Sensitivity Assessment 2021 ([LAN7e](#)) undertaken for the site'. It is considered that this instruction is appropriate as the landscape assessment, as an important piece of evidence specifically for North East Thatcham, is a useful tool to guide the LVIA, and establishes certain areas which the LVIA can focus on.

SP23 Transport – the first bullet point outlines that development will be required to 'minimise the impact of all forms of travel on the environment, in accordance with West Berkshire's declared Climate Emergency and Environment Strategy' ([VO3](#)). It is not considered that the policy requires compliance with the Council's Climate Emergency and Environment Strategy, only that such developments minimise all forms of travel, which is in accordance with the aims of the Climate Emergency and Environment Strategy. No modification is therefore required.

SP23 Transport – In the fourth paragraph it states 'Development proposals should follow the advice set out in the Council's 'Highway Design Guidance for Residential Developments'. It is considered that this does not require modification as it does not require compliance, but that development should follow the advice (officer emphasis).

Site Allocation Policies

Landscape Capacity Assessments reference

The following site allocation policies require development to be in accordance with Landscape Capacity Assessments or Landscape Sensitivity Capacity Assessments ([LAN1 - 8](#)), each related to the particular site:

- *RSA2 Land at Bath Road, Speen, Newbury (Site ref HSA2)*
- *RSA6 Stoneham's Farm, Long Lane, Tilehurst (Site ref HSA9)*
- *RSA7 72 Purley Rise, Purley on Thames (Site ref HSA11)*
- *RSA9 Land between A340 and The Green Theale (Site ref HSA14)*
- *RSA10 Whitehart Meadow Theale (Site ref THE1)*
- *RSA11 Former Theale Sewage Treatment Works Theale (Site ref THE7)*
- *RSA14 Land adjoining Lynch Lane Lambourn (Site ref HSA19)*
- *RSA15 Land at Newbury Road, Lambourn (Site ref HSA20)*
- *RSA19 Land west of Spring Meadows, Great Shefford (Site ref GS1)*
- *RSA20 Land off Charlotte Close Hermitage (Site ref HSA24)*
- *RSA21 Land to the south east of the Old Farmhouse, Hermitage (Site ref HSA25)*
- *RSA22 Land adjacent to Station Road, Hermitage*
- *RSA23 Land adjoining The Haven, Kintbury (Site re KIN6)*
- *ESA2 Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands (Site ref LAM6)*
- *ESA3 Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands (Site ref LAM10)*
- *ESA4 Beenham Landfill, Pips Way, Beenham (Site ref part of BEEN3 and part of BEEN5)*
- *ESA5 Northway Porsche, Grange Lane, Beenham (Site re BEEN10)*

As the Landscape Sensitivity and Capacity Assessments are evidenced documents specifically for the sites mentioned above it is considered necessary for development to follow the recommendations of each LCA, in the interests of conserving and enhancing the character and appearance of the locality. No modifications are necessary.

Living Landscape

RSA4 Land off Greenham Road, South East Newbury (Site ref HSA4) and RSA5 Land at Lower Way Thatcham (Site ref THA025)

Criterion h) RSA4 and criterion f) RSA5 requires the schemes to 'support and make a positive contribution to the West Berkshire Living Landscape project'. The Living Landscape Project ([BIO7](#)) includes nature reserves including Thatcham Reedbeds, Audrey's Meadow, Bowdown Woods and The Nature Discovery Centre, which are in close proximity to the two sites. The criterion is necessary to ensure biodiversity enhancements of these important habitats in existing Biodiversity Opportunity Areas, some of which are SSSIs. No modifications are necessary.

Other references

RSA10 and RSA11 (Theale Whitehart Meadow and Former Sewage Treatment Works)

Criterion bi) on both policies requires the siting of developments to be in accordance with National Grid's publications 'A Sense of Place' (SD8) and 'Development near overhead power lines' (SD9). This is essential to ensure that National Grid's assets are protected, and the future residents' amenity is protected from the overhead power lines. This follows on from the consultation responses and further clarification sought from National Grid in relation to the protection of their assets. No modifications are necessary.

Development Management Policies

DM3 Health and Wellbeing – the second paragraph within the policy outlines that an application for major development should be accompanied by a Health Impact Assessment to be in accordance with current guidance from Public Health England. The policy does not require that the development is in accordance with the Public Health England guidance, but that the Health Impact Assessment (HIA) is. HIAs add value to the planning application, and therefore should be informed by the most up to date guidance. Being in accordance with the guidance seeks to ensure consistency in detail expected from applicants. No modification is proposed.

DM5 Environmental Nuisance and Pollution Control – Criterion f outlines that 'A Lighting appraisal in accordance with the current guidance from the Institute of Lighting Professionals ...'

The policy does not require that the development is in accordance with the current guidance from the ILP, but that the lighting appraisal be in accordance with the guidance. Being in accordance with the guidance seeks to ensure consistency in detail expected from applicants. No modification is proposed.

DM30 Residential Space Standards. All dwellings should comply with the nationally described space standards as set out in the Technical Housing Standards (2015). The policy has been amended and the extent of wording has been reduced since the policy presented at Regulation 18, and has flexibility, as dwellings should comply with the Technical Housing Standards, rather than must comply. The supporting text outlines that in limited circumstances the Council may accept proposals which do not comply with the policy.

DM37 Equestrian and Horseracing Industry. The first paragraph after the listed criteria states that 'in all cases, proposals will be expected to demonstrate the adequate provision of land to allow for the proper care of horses, including stabling, grazing and exercise, in accordance with Equine Industry Welfare Guidelines and the British Horse Society standards'.

The care of horses is a key consideration, and this is the reason the policy requires planning applications to demonstrate that there is adequate provision of land, in accordance with the current guidelines and standards. No modification is proposed.

DM42 Transport Infrastructure. The transport infrastructure will specifically, but not exclusively, include the following: criterion b) Walking, cycling and equestrian infrastructure identified in relevant Local Cycling and Walking Infrastructure Plans.

Criterion b) directs the reader to relevant Plans, so they ensure the walking, cycling and equestrian infrastructure ties up with what is planned. The policy directs the provider of such infrastructure where to find the necessary information, not requiring the applicant to be in accordance with such Plans. No modification is proposed.

DM44 Parking. 2nd paragraph – ‘Cycling and motorcycle parking should be provided in accordance with the Council’s ‘Cycling and Motorcycling Advice and Standards for New Development’ (SD7). The policy requires that development should be in accordance with the Council’s document (officer emphasis). As the document sets out what is expected to be delivered on site it is important that applicants follow the requirements of the document. This also aids in securing consistency in submission of planning applications and in assessment of planning applications.

DM 44 Parking 3rd paragraph (for electric charging points) – ‘Details of how these charging points should be delivered and where there are opportunities to go beyond the minimum standards are set out in the Council’s guidance ‘Electric Vehicle Charging Points for new development. This must be taken into account when planning new development’.

As the Council has declared a climate emergency and has developed a strategy for achieving zero carbon, going beyond the standards set out in the Building Regulations is a method of aiding in delivering the aims of the strategy. Applicants are therefore asked to take account of the Council’s document on electric vehicle charging points (reference to the document in the examination library will follow).

DM 44 Parking 5th paragraph (residential parking) – ‘The layout and design of parking spaces should follow the parking design guidance included within the Council’s ‘Highway Design Guidance for Residential Development’.

The policy requires that development should be in accordance with the Council’s document (officer emphasis). As the document sets out what is expected to be delivered on site it is important that applicants follow the requirements of the document (reference to the document in the examination library will follow). This also aids in securing consistency in submission of planning applications and in assessment of planning applications.

Plan period

Inspector:

The Local Development Scheme¹⁴ indicates that the Plan is expected to be adopted in September 2024. This means that strategic policies to 2039 would not be consistent with national planning policy which expects them to look ahead over a minimum 15 year period from adoption¹⁵.

PQ19. What is the justification for the strategic policies in the Plan not looking ahead a minimum 15 year period from adoption as expected by national policy?

Council response:

In accordance with the Local Development Scheme (LDS, 2023) (CD9), the LPR is due to be adopted in September 2024 with an end date of 2039. However, the Council acknowledge the need for the Plan to cover full financial years post adoption, which coincide with the planning monitoring year. An adoption date of September 2024 would fall within monitoring years 2024/25 and as such an additional year would need to be added to the plan period to ensure a full 15 years from adoption in accordance with the NPPF.

However, the Council is mindful that as a result of the agreed extension to the deadline for responding to the Preliminary Questions, the hearing sessions are now unlikely to start until 2024. This could therefore result in the LPR not being adopted until 2025/26 and in which case a further year may need to be added to the plan period bringing this to 2040/41.

The Council therefore proposes Main Modifications to the plan period to extend this by two additional years to 2041 to add resilience to the process. It is proposed these changes are made throughout the LPR document as appropriate where reference is made to the plan period ending in 2039.

This in turn will require a further Main Modification to the housing requirement in Policy SP12, as set out below, and to any reference to the housing requirement figure throughout the LPR document as appropriate.

Policy SP12 Approach to Housing Delivery

Provision will be made for ~~8,721 to 9,146~~ 9,747 to 10,222 net additional homes in West Berkshire for the period 1 April 2022 to 31 March ~~2039~~2041; 513 to 538 dwellings per annum. The target figure of 538 dwellings per annum does not constitute a ceiling or cap to development.

¹⁴ CD9.

¹⁵ NPPF 22.

PQ20. If I were to conclude that the Plan needs to be modified to look ahead over a minimum 15 year period from adoption, which policies would need to be modified and in what way?

Council response:

The table below sets out the policies that would need to be modified with a comment on the required modification. Potential consequential evidence base updates may be required to inform any updates to the below policies.

Policy	Reason
SP12 approach to Housing Delivery	<i>Housing provision will need to be updated to take account of additional years added to the plan period, along with consequential updates to text</i>
SP13 Sites allocated in Newbury and Thatcham	<i>Policy proposed for deletion as per response to PQ14b.</i>
SP14 Sites allocated in Eastern Area	<i>Policy proposed for deletion as per response to PQ14b.</i>
SP15 Sites allocated in North Wessex Downs AONB	<i>Policy proposed for deletion as per response to PQ14b.</i>
SP18 Housing type and mix	<i>Potential consequential updates to the supporting text may be required to take into account the additional years added to the plan period.</i>
SP19 Affordable Housing	<i>Potential consequential updates to the supporting text may be required to take into account the additional years added to the plan period.</i>
SP20 Strategic Approach to employment land	<i>Employment land provision will need to be updated to take account of additional years added to the plan period, along with consequential updates to text.</i>
SP21 Sites allocated for Employment Land	<i>Policy proposed for deletion as per response to PQ14b.</i>
SP22 Town and District Centres	<i>Provision will need to be updated to take account of additional years added to the plan period, along with consequential updates to text.</i>
DM19 Specialised Housing	<i>Provision will need to be updated to take account of additional years added to the plan period, along with consequential updates to text.</i>
DM20 Gypsies, Travellers and Travelling Showpeople	<i>Provision will need to be updated to take account of additional years added to the plan period, along with consequential updates to text.</i>

Reasonable alternatives

Inspector:

Local planning authorities are required to consider “reasonable alternatives” during the preparation of local plans¹⁶. These should take account of the objectives and geographical scope of the plan¹⁷.

PQ21. What were the reasonable alternatives considered during the preparation of the Plan in terms of:

- (a) The amount of housing, economic, and other development to be accommodated.**
- (b) The spatial strategy for accommodating that development, including the settlement hierarchy and the approach to allocating land in the vicinity of the Atomic Weapons Establishments.**
- (c) The sites allocated in the Plan.**
- (d) The strategic and non-strategic development management policies in the Plan.**

Council response:

PQ21 a) As part of the plan preparation the following reasonable alternatives were considered for:

Amount of housing development to be accommodated:

Options to assess alternative levels of growth were considered as part of the SA/SEA report published for the Regulation 18 consultation on the Emerging Draft Local Plan Review in December 2020 (CD17a). At this stage in the plan preparation, the SA/SEA assessed three options as part of SP12:

- 1. Baseline need – 2020 LHN (513dpa)*
- 2. Boosting supply – range of between 520 dpa (the 2019 LHN) and 575dpa (10% uplift)*
- 3. Significantly boosting supply – 692dpa (derived using the revised algorithm proposed in MHCLG consultation on proposed changes to the planning system).*

The above options set out the different levels of housing growth but the eventual impacts will also depend on the location and design of development. The preferred option taken forward into the Regulation 18 Plan was option 2, for a level of growth that exceeded the LHN at the time (2019 LHN using the government’s standard methodology) and would boost housing supply.

¹⁶ NPPF 35b and The Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations).

¹⁷ SEA Regulation 12(2).

Further to this the SA/SEA Report published (November 2022) for the Regulation 19 Proposed Submission LPR ([CD3a](#)) goes further and considers the following options at Section 5.3.1 Table 25:

- a. Continuing with the Core Strategy figure (525dph)
- b. Local Housing Need figure (LHN) (2022 LHN 513 dpa)
- c. LHN plus buffer (513dph + a buffer to be determined)
- d. Significantly boosting supply (692dph using proposed method in government consultation 2020)

Table 26 of [CD3a](#) goes on to consider the baseline LHN along with the baseline plus a buffer of either 5% or 10%.

- i) Baseline LHN (2022 LHN 513dpa)
- ii) Boosting supply (513dpa + 10% = 564dpa)
- iii) Boosting supply (513dpa + 5% = 538dpa)

Economic and other development to be accommodated:

The amount of development to be accommodated for these types of development (economic and other) have been taken forward from the LPR evidence base and no reasonable alternatives were considered.

PQ21 b) As part of the plan preparation the following reasonable alternatives were considered for:

The spatial strategy for accommodating development:

The SA/SEA report published for the Regulation 18 consultation on the Emerging Draft Local Plan Review in December 2020 ([CD17a](#)) initially assessed two options as part of SP1 Spatial Strategy:

1. SP1 (i) revised policy
2. SP1 (ii) continue with current distribution of development (ADPP1 – ADPP6 of Core Strategy)

The revised policy essentially continues the strategy set out in the Core Strategy with a focus on the existing settlement pattern and emphasis on the place-based approach of considering development in the different spatial areas of the District, but with an increased focus for development in the Newbury and Thatcham area. The revised policy, with the former Eastern Area and East Kennet Valley combined into a new Eastern Area, also provides more flexibility in spatial planning terms as the former, significantly smaller and constrained Eastern Area would become more difficult to plan for as a separate area.

The revised spatial strategy needs to set out the approach for the next 15 years from plan adoption and the most fundamental proposal was to focus a higher proportion of development within the Newbury and Thatcham area. Other spatial areas are more constrained and have more limited potential for development on brownfield land or for significant greenfield urban extensions. Thatcham was previously allocated only modest development in the Core Strategy and Housing Site Allocations DPD but it this option proposed that the town becomes the focus for significant development in the plan period to 2037.

The SA/SEA Report November 2022 ([CS3a](#)) considers the spatial strategy at Section 5.1.1 Table 10 with the following options:

- a. Retain existing spatial strategy of the Core Strategy (4 spatial areas – Newbury & Thatcham, Eastern Area, East Kennet Valley, AONB)
- b. Revised spatial strategy with 3 spatial areas (Newbury & Thatcham, Eastern Area, AONB).

This section of the SA/SEA ([CD3a](#)) outlines that the spatial strategy also considers the distribution of development across the District and Table 11 considers the following options (with detailed SA/SEA table included in Appendix 4 [[CD3e](#)]):

- i. Additional housing requirement based on Core Strategy distribution (60% dwellings in Newbury/Thatcham, 21% in Eastern Area and East Kennet Valley, 19% in AONB).
- ii. Increased focus on Eastern Area - A site at Grazeley was put forward as a long term development proposal by a group of landowners/developers as a potential new settlement, for in the region of 10,000 dwellings plus supporting infrastructure). The sites included in the proposal are located in West Berkshire, Wokingham and Reading, therefore, development in this area would be supporting growth across the three Local Authorities. A number of smaller sites would be considered across the rest of the District.
- iii. Reduced focus on AONB - There are still allocations in the AONB to deliver, which will largely meet housing need in this rural area. Two of the Rural Service Centres have designated NDPs (Hungerford & Lambourn), the third (Pangbourne) has limited development opportunities. This scenario would see limited additional growth in these settlements and in the smaller service villages (one of which is preparing an NDP (Hermitage) and one who adopted an NDP in early 2022 (Compton).
- iv. Continued focus on Newbury - This option would focus a strategic site in the Newbury areas, with a number of smaller sites considered across the rest of the District.
- v. Focus on Thatcham - This option would focus a strategic site in the Thatcham area, with a number of smaller sites considered across the rest of the District. The Core Strategy focused limited growth in Thatcham (despite it being in the top tier of the settlement hierarchy) due to the rapid expansion that had taken place in the town over recent years. This was to allow a period of consolidation, ensuring the infrastructure and town centre facilities could be upgraded to meet the demands of the existing population. In reviewing the vision for Thatcham for the LPR the Council commissioned a Thatcham Strategic Growth Study. The study identified that strategic development would be required in Thatcham to support service provision and regeneration.

The settlement hierarchy:

The settlement hierarchy was considered as part of the SA/SEA report published for the Regulation 18 consultation on the Emerging Draft Local Plan Review in December 2020 ([CD17a](#)). At this stage in the plan preparation, the SA/SEA assessed two options as part of SP3 Settlement Hierarchy:

1. SP3 (i) Revised policy with greater specification

2. SP3 (ii) Continue with current policy.

Within the Core Strategy the settlement hierarchy is set out within ADDP1 and is set at a high level with the spatial strategy. The revised policy is separate to the spatial strategy policy but provides linkages between the two and allows for more detail to be provided.

The SA/SEA Report November 2022 ([CS3a](#)) considers the settlement hierarchy further at Section 5.1.2 and considers the following options:

- a. Remove Aldermaston as a service village due to a reduction in available services and facilities in the village since the initial designation.*
- b. Add Streatley as a service village as the village has access to a number of services and facilities in the neighbouring village of Goring (located within Oxfordshire).*
- c. Remove Burghfield as a rural service centre due to the presence of the AWE DEPZ.*

Detailed SA/SEA assessment is set out in Appendix 4 ([CD3e](#)), with the Settlement Hierarchy Review Topic Paper ([SET1](#)) setting out the detail of the settlement hierarchy review.

The approach to allocating land in the vicinity of the Atomic Weapons Establishments (AWE):

The approach to development within the vicinity of AWE is set out within SA/SEA report published for the Regulation 18 consultation on the Emerging Draft Local Plan Review in December 2020 ([CD17a](#)) as part of SP4. Within this section, two options were considered:

- 1. SP4 (i) Revised policy*
- 2. SP4 (ii) Continue with current policy.*

The two nuclear licenced facilities within West Berkshire do pose a potential, albeit remote possibility of harm to public health, and for this reason, and in line with the REPP19 Legislation, they warrant their own policy to manage development in the area most likely to be impacted. No reasonable alternatives were considered with regard to the approach to allocating land in the vicinity of AWE due to the interest of public safety.

PQ21 c) As part of the plan preparation the following reasonable alternatives were considered with regards to the sites allocated in the Plan.

Site options for the Plan were initially considered as part of the SA/SEA report published for the Regulation 18 consultation on the Emerging Draft Local Plan Review in December 2020 ([CD17a](#)) in Section 5. The site options considered were identified through the Housing and Economic Land Availability Assessment (HELAA) ([SIT4](#) and associated appendices), which makes a preliminary assessment of the potential and suitability of sites. The Site Selection Methodology paper ([SIT1](#)) sets out more detail on how the sites were assessed through the HELAA. Sites which were considered to have potential, and which were considered suitable through the

HELAA process were then subject to SA/SEA. A total of 50 sites were appraised during the initial SA/SEA assessment for the Regulation 18 LPR and the detailed appraisals are set out in Appendix 5 of [CS17f](#), with a summary in Table 15 of [CD17a](#).

The SA/SEA Report November 2022 ([CS3a](#)) further considers site options under section 5.3.2 with the detailed assessment tables set out in Appendix 4 for the strategic sites ([CD3e](#)) and appendix 8 for non-strategic sites ([CD3i-k](#))

For the strategic sites, consideration was given to the strategic sites already allocated within the Core Strategy. Newbury Racecourse is already largely completed and therefore is not carried forward as an allocation in the LPR. Whereas Sandleford Park obtained outline planning permission in May 2022 and is yet to have completions on site. This site is carried forward as an allocation in the LPR following the initial SA/SEA consideration at Regulation 18 and the following options were then considered in [CD3a](#):

1. Re-allocate the site as a single site (as in Core Strategy for up to 2000 dwellings)
2. Re-allocate the site in two parts
3. Re-allocate part of the site
4. Re-allocate the site as a single site for 1500 dwellings.

Taking forward the spatial strategy focus on Thatcham, strategic site options were considered as follows under section 5.1.1 (pg 25 of [CD3a](#)):

- a. North East Thatcham for up to 2,500 dwellings
- b. Colthrop for approximately 800 dwellings
- c. Newbury/Thatcham gap for approximately 100 dwellings
- d. Henwick for approximately 250 dwellings
- e. North East Thatcham and Henwick combined total.

Following the selection of option a. above, further work was undertaken in response to comments made as part of the Regulation 18 consultation with regards to the quantum of development to be delivered on the North East Thatcham strategic site. As such, two further options were considered which assessed a quantum of development for up to 2,500 dwellings on this site, and another for 1,500 dwellings. Details are set out in Table 30 of [CD3a](#).

For existing site allocations within the Housing Site Allocations (HSA) DPD these were assessed as part of the initial SA/SEA assessment for Regulation 18, as set out above. As part of the SA/SEA Report November 2022 ([CS3a](#)) these are considered further under section 5.3.2.1 Non Strategic Residential Site Allocations and summarised in Table 32. Several of the existing allocations have now been completed or are under construction so do not need to remain as allocations within the LPR, the remaining sites have been reviewed and where there is a realistic chance of delivery they have been carried forward.

For new non-strategic site allocations, site options were considered as part of the Regulation 18 SA/SEA ([CD17a](#)), as set out above. Further updates to the HELAA were then made following Regulation 18 consultation as new sites came forward and other sites were removed. The HELAA site assessments then determined which

sites came forward for consideration through the SA/SEA process as site options. The November 2022 Report ([CD3a](#)) sets out the SA/SEA summary of these sites by spatial area under 5.3.2.1 New Allocations in the LPR (page 48-76 with full assessments in Appendix 8b ([CD3j-k](#))). The employment site options are considered on pages 79-87 of [CD3a](#) and full assessments in Appendix 8c ([CD3k](#)).

PQ21d) Each policy, strategic and non-strategic in the Emerging Draft Local Plan Review, was assessed as part of the SA/SEA report published for the Regulation 18 consultation in December 2020 ([CD17a](#)). The SA/SEA assessment of each policy option is set out in Appendix 4 of [CD17e](#), and each policy considers two options:

1. Where there is an existing policy covering a topic area the options considered were to continue with current policy or have a revised policy with greater specification
2. Where there is no existing policy, the options were for a new policy or no policy.

Where policies have been taken forward in the LPR, these policies have then been subject to further SA/SEA in the November 2022 Report ([CD3a](#)) and this is set out in Section 5 of the report, with detailed assessments contained in Appendix 4 ([CD3e](#)), Appendix 5 ([CD3f](#)) and Appendix 6 ([CD3g](#)).

Atomic Weapons Establishments (AWE)

Inspector:

Policy SP4 states that planning permission is likely to be refused for development in the Detailed Emergency Planning Zones of AWE Aldermaston and AWE Burghfield and sets out consultation arrangements for different types of development in the 5km Outer Consultation Zones and 12km Consultation Zones for those establishments. The zones are defined on the Policies Map ([CD2](#)) and indicated on maps in Appendix 3.

PQ22. What, if any, development is proposed on allocations in the Plan in (a) the Detailed Emergency Planning Zones and (b) the 5km Outer Consultation Zones around AWE Aldermaston and AWE Burghfield?

Council response:

a) Within the Local Plan Review, there is one residential allocation that falls within the Detailed Emergency Planning Zone (DEPZ) for AWE Burghfield, also there is a Gypsy and Traveller site allocation within the DEPZ for AWE Aldermaston. Both are retained allocations from the current Local Plan and are illustrated in Figure 1 below.

AWE Aldermaston DEPZ:

Land adjacent to New Stocks Farm, Paices Hill, Aldermaston (policy RSA24) is currently allocated within the Housing Site Allocations Development Plan Document (HSA DPD) as a Gypsy and Traveller site for 8 permanent pitches. The site is already used for gypsy and traveller accommodation (transit site), and the proposed permanent use was not considered to have an impact on the emergency plan.

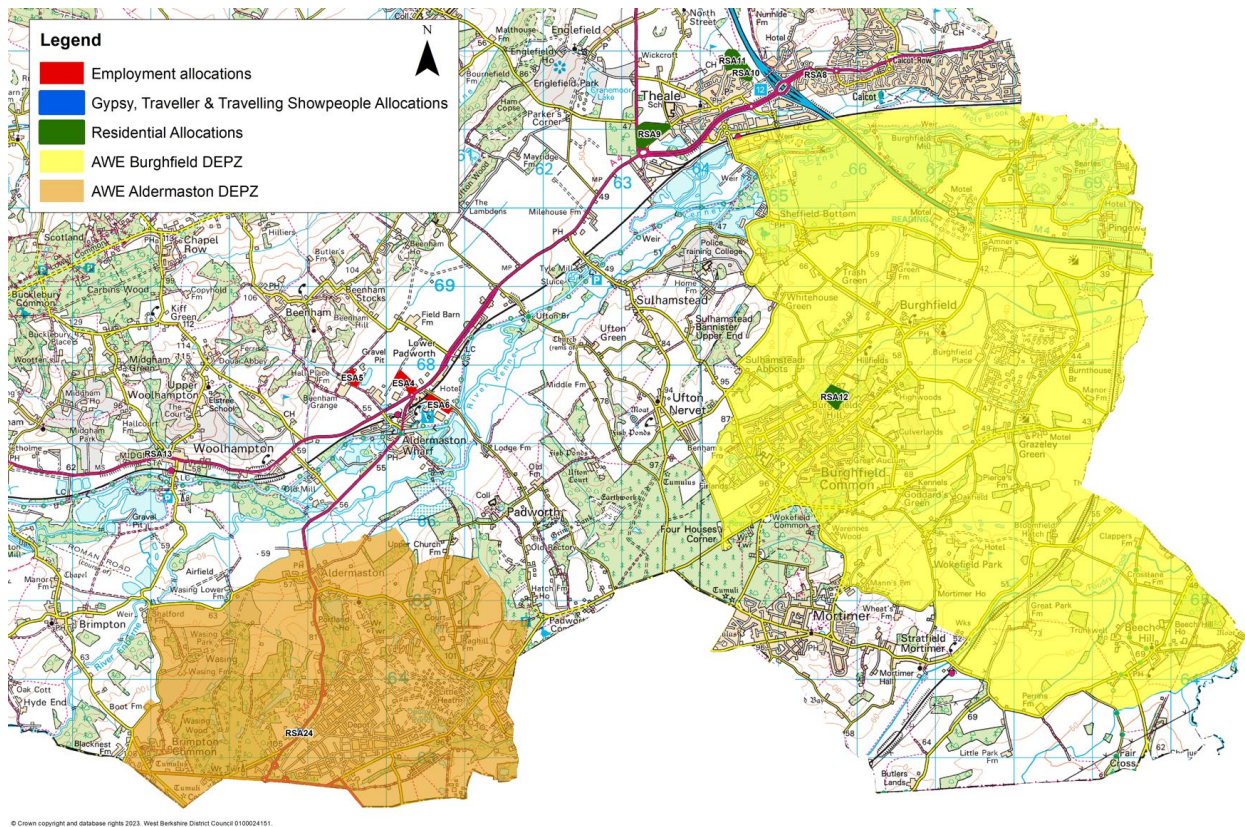
Full planning permission (22/00120/FUL) for the change of use from 8 transit caravans to 8 permanent pitches was granted permission on 30 September 2022.

AWE Burghfield DEPZ:

Land adjoining Pondhouse Farm, Burghfield (policy RSA12) is currently allocated within the HSA DPD for approximately 100 dwellings. Outline planning permission (ref. 18/02485/OUTMAJ) was granted planning permission on 5 December 2019, meaning that at the time the DEPZ was reconsidered in 2020, the 100 units proposed were included in the detailed calculations undertaken by Emergency Planning.

Since 2022, the site has been subject to a number of Reserved Matters applications and approvals.

Figure 1:



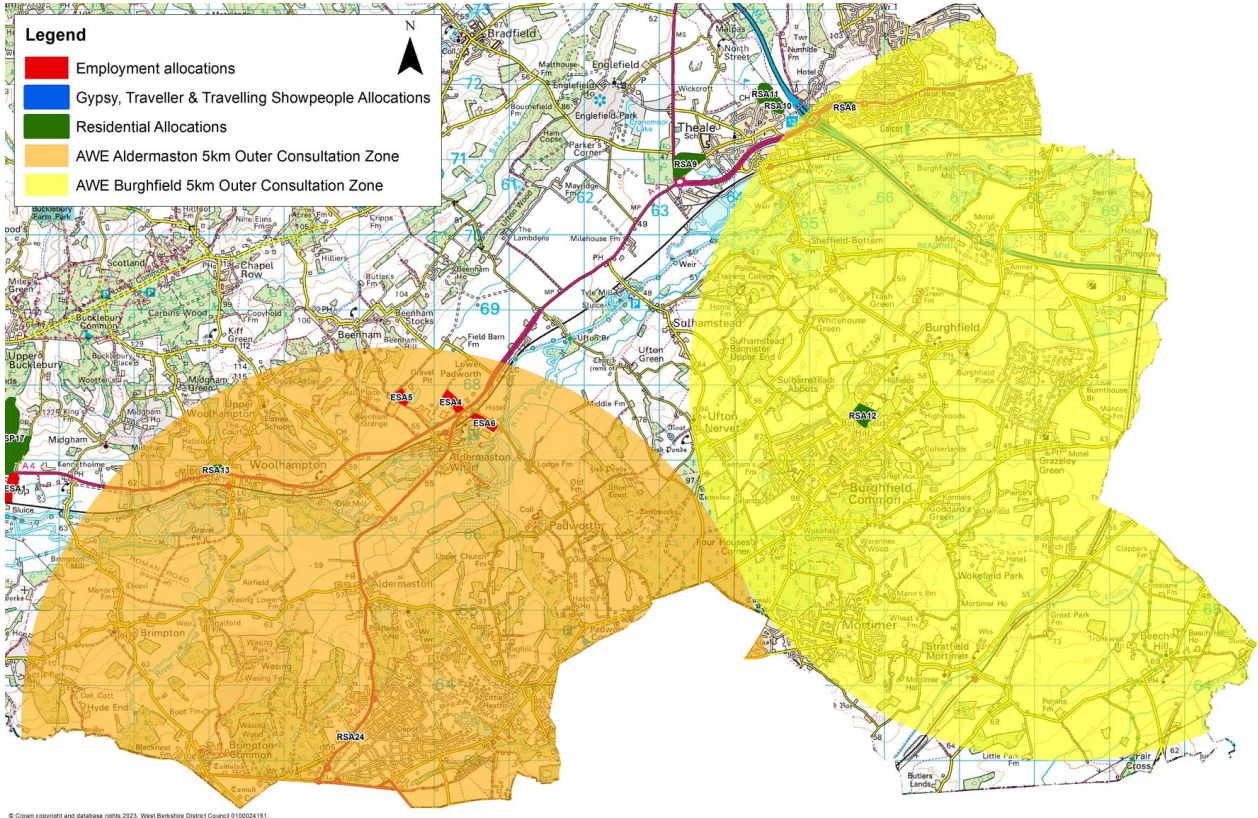
b) Policy SP4 confirms that the Outer Consultation Zones (OCZ) relating to AWE Aldermaston and AWE Burghfield are set at 5 kilometres as prescribed by Radiation (Emergency Preparedness and Public Information) Regulations 2001/2975.

The following allocations are proposed within AWE Aldermaston and AWE Burghfield. They are also shown in Figure 2 below.

Policy	Allocation	Dwellings / floorspace
AWE Aldermaston		
RSA13	Land north of A4 Bath Road, Woolhampton	16 dwellings
RSA24	New Stocks Farm, Paices Hill, Aldermaston	8 permanent Gypsy and Traveller pitches
ESA4	Beenham Landfill, Pips Way, Beenham	14,000 sq.m of employment floorspace for B2 and/or B8 uses
ESA5	Northway Porsche, Grange Lane, Beenham	6,400 sq.m of employment floorspace for B2 and/or E(g)(iii) uses
ESA6	Land adjacent to Padworth IWMP, Padworth Lane, Padworth	12,400 sq.m of employment floorspace for B2 and/or B8 uses

<i>AWE Burghfield</i>		
<i>RSA8</i>	<i>Land adjacent to Bath Road and Dorking Way, Calcot</i>	<i>35 dwellings</i>
<i>RSA12</i>	<i>Land adjoining Pondhouse Farm, Clayhill Road, Burghfield Common</i>	<i>100 dwellings</i>

Figure 2:



Flood risk

Inspector:

Paragraph 4.8 of the Sequential Test Report¹⁸ states that all sites considered to be reasonable alternatives for accommodating the proposed growth identified in the Plan have been assessed for flood risk and that the allocations are appropriate from a flooding perspective.

PQ23. Are any of the allocations in the Plan within flood zone 2 or flood zone 3, or otherwise identified as being at risk of flooding? If so, summarise how the site passed the sequential test and exception test, and clarify whether the development proposed on the allocation could be located away from the areas at risk of flooding.

Council response:

Whilst some of the allocations do contain small areas at risk of flooding, development can be accommodated outside of these areas, as the table below sets out.

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
<i>Strategic site allocations</i>	
<i>SP16: Sandleford</i>	<p><i>The site is allocated within the Core Strategy and the allocation is being retained in the Local Plan Review (LPR).</i></p> <p><i>Small areas of the site are at risk of flooding; however development can be accommodated outside of these areas.</i></p> <p><i>1% of the site lies within Flood Zone 2 and 1% in Flood Zone 3b. Both areas are restricted to the far southern site boundary.</i></p> <p><i>A very small proportion of the site is at risk of surface water flooding (2% in a 1 in 30-year event, 3% in a 1 in 100-year event, and 6% in a 1 in 1000-year event. The surface water flood risk follows the routes of the ordinary watercourses within the site.</i></p> <p><i>Regarding groundwater flooding, it should be noted that the SFRA used two datasets to assess this – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data.</i></p>

¹⁸ WAT5.

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
	<p>Only 35% of the site is within the highest risk category on JBA's groundwater map, and this area is concentrated within the central and southern part of the site. Nonetheless the Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not indicated that there have been any incidences of groundwater flooding on the site.</p> <p>Appendix C: Site Maps (see site ref CS3, pp. 19-20) of the Level 2 Strategic Flood Risk Assessment (SFRA) illustrates the areas at risk of flooding on the site. The site-specific allocation policy (SP16) requires that a detailed flood risk assessment with hydraulic modelling will be required for the whole site as part of any planning application.</p> <p>The eastern half of the site has outline planning permission (20/01238/OUTMAJ), and an outline application is pending determination for the western half (23/01585/OUTMAJ). The approved masterplan for the eastern half includes a country park in the central area of the site which the JBA flood map shows as being in the highest risk category. T</p>
SP17: North East Thatcham	<p>This is a new site allocation, and it does not have planning permission.</p> <p>Small areas of the site are at risk of flooding; however, development can be accommodated outside of these areas.</p> <p>The site lies within Flood Zone 1 and a small part (19%) is at risk of surface water flooding in a 1 in 1000-year flood event. Development could be accommodated outside of the areas at risk of flooding.</p> <p>Regarding groundwater flooding, it should be noted that the SFRA used two datasets to assess this – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data.</p> <p>The JBA Flood Map shows that the majority of the site is not at risk of groundwater flooding. Within the far south eastern site corner, groundwater levels are within 0.025m of the ground surface. Nonetheless the Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not indicated that there have been any incidences of groundwater flooding on the site.</p> <p>The site-specific allocation policy (SP17) requires that development of the site must be supported by a Sustainability Charter which will establish how the policy requirements will be achieved. This will be informed by an Integrated Water Supply and Drainage Strategy which will</p>

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
	set out surface water management approaches that could deliver net gain for Thatcham town, including use of on-site sustainable drainage systems.
Other residential allocations	
<i>RSA1: Land north of Newbury College, Newbury</i>	<i>Retained allocation from the Housing Site Allocations Development Plan Document (HSA DPD). The site has outline and Reserved Matters permission. Within Flood Zone 1. Not at risk of surface water flooding and groundwater levels at least 5m below the ground.</i>
<i>RSA2: Land at Bath Road, Speen, Newbury</i>	<i>Retained allocation from the HSA DPD. Site has outline planning permission for 107 units (17/02092/OUTMAJ), and full permission for 11 units. The site is within Flood Zone 1 and is not at risk from any other source of flooding.</i>
<i>RSA3: Land at Coley Farm, Newbury</i>	<i>Retained allocation from the HSA DPD. Site has full planning permission (20/00604/FULEXT). Small areas of the site are at risk of flooding; however, development can be accommodated outside of these areas. Within Flood Zone 1. Small area within the central eastern part of site at risk of surface water flooding within a 1 in 1000-year event. The approved plans include two attenuation basins. The site-specific policy for the site requires any planning application to be accompanied by a Flood Risk Assessment (FRA) which must consider the flood risk downstream of the site and include mitigation measures including sustainable drainage measures to manage surface water on-site. No risk from groundwater flooding.</i>
<i>RSA4: Land off Greenham Road, Newbury</i>	<i>Retained allocation from the HSA DPD. The site has outline and Reserved Matters permission. Small areas of the site are at risk of flooding; however, development can be accommodated outside of these areas. Within Flood Zone 1. Small areas of the site at risk of surface water flooding in a 1 in 1000-year event. The approved plans do not include development within these areas. No risk of groundwater flooding.</i>
<i>RSA5: Land at Lower Way, Thatcham</i>	<i>Retained allocation from the HSA DPD. Site has full planning permission. Small areas of the site are at risk of flooding; however, development can be accommodated outside of these areas. Within Flood Zone 1. Far western corner of the site at risk of surface water flooding in a 1 in 30-year event. The approved plans (18/00964/FULEXT) do not include any development within this area.</i>

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
	<p><i>The site-specific policy for the site requires that any planning application must be supported by a FRA which considers the adjacent area of surface water flood risk and the ordinary watercourse on the site. The FRA must also consider all potential sources of flood risk and advise on the necessary mitigation measures to be incorporated within the development.</i></p> <p><i>The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that groundwater levels either at or very close to surface across southern half of site, and are between 0.025m and 0.5m below surface across remainder of site. However, the SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not indicated that there have been any incidences of groundwater flooding on the site.</i></p>
<p><i>RSA6: Stoneham's Farm, Tilehurst</i></p>	<p><i>Retained allocation from the HSA DPD. The site has full planning permission.</i></p> <p><i>Small areas of the site are at risk of flooding; however, development can be accommodated outside of these areas.</i></p> <p><i>Within Flood Zone 1. Small area within the centre of the site at risk of surface water flooding in a 1 in 100-year event, and part of the western site boundary at risk of surface water flooding in a 1 in 1000-year event. The approved plans do not include any development in these areas.</i></p> <p><i>Groundwater levels are at least 5m below the ground.</i></p>
<p><i>RSA7: 72 Purley Rise, Purley on Thames</i></p>	<p><i>Retained allocation from the HSA DPD. Site has outline and Reserved Matters permission.</i></p> <p><i>Within Flood Zone 1. Not at risk from surface water flooding. Groundwater levels between 0.025m and 5m below the ground.</i></p> <p><i>The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that groundwater levels are between 0.025m and 5m below the ground. However, the SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not</i></p>

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
	<i>indicated that there have been any incidences of groundwater flooding on the site.</i>
<i>RSA8: Land adjacent to Bath Road and Dorking Way, Calcot</i>	<p><i>Retained allocation from the HSA DPD. The site does not have planning permission.</i></p> <p><i>Within Flood Zone 1. The western site boundary at risk of surface water flooding in a 1 in 1000-year event. No risk of groundwater flooding.</i></p>
<i>RSA9: Land between A340 & The Green, Theale</i>	<p><i>Retained allocation from the HSA DPD. The site has outline planning permission. Reserved Matters application pending determination.</i></p> <p><i>Within Flood Zone 1. The north eastern site corner and three small areas within the north western part of the site are at risk of surface water flooding in a 1 in 1000 year event. These areas fall within a landscape buffer as identified in the site specific policy for the site. The approved plans do not include any development within these areas.</i></p> <p><i>Groundwater levels are either at or very close to surface. The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that groundwater levels either at or very close to surface across southern half of site, and are between 0.025m and 0.5m below surface across remainder of site. However, the SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not indicated that there have been any incidences of groundwater flooding on the site. The site specific policy for the site requires that the scheme must be supported by a FRA which will form any mitigation measures.</i></p>
<i>RSA10: Whitehart Meadow, Theale</i>	<p><i>New allocation. Parts of the site are at risk of flooding; however, development can be accommodated outside of these areas.</i></p> <p><i>Far northern part of site within Flood Zone 2, and the remainder of the site is within Flood Zone 1. Development can be accommodated within Flood Zone 1.</i></p> <p><i>Small parts of the site are at risk of surface water flooding in a 1 in 1000 year flood event.</i></p> <p><i>The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that groundwater levels are within 0.025m below the ground. However, the SFRA comments that the JBA</i></p>

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
	<p><i>Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not indicated that there have been any incidences of groundwater flooding on the site.</i></p> <p><i>Criterion (g) of the site specific policy requires a FRA, whilst criterion (h) does not allow development within Flood Zone 2.</i></p>
<p><i>RSA11: Former Theale Sewage Treatment Works, Theale</i></p>	<p><i>New allocation. Parts of the site are at risk of flooding; however, development can be accommodated outside of these areas.</i></p> <p><i>The site is predominantly within Flood Zone 1, however the south eastern site corner is within Flood Zone 2. A small area within the centre of the site is at risk of surface water flooding in a 1 in 1000 year event.</i></p> <p><i>The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that groundwater levels are within 0.025m below the ground. However, the SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not indicated that there have been any incidences of groundwater flooding on the site.</i></p> <p><i>Criterion (g) of the site specific policy requires a FRA, whilst criterion (h) does not allow development within Flood Zone 2.</i></p>
<p><i>RSA12: Land adjoining Pondhouse Farm, Burghfield Common</i></p>	<p><i>Retained allocation from the HSA DPD. The site has outline and reserved matters planning permission.</i></p> <p><i>Within Flood Zone 1 and no risk of surface water flooding.</i></p> <p><i>No risk of groundwater flooding.</i></p>
<p><i>RSA13: Land north of A4 Bath Road, Woolhampton</i></p>	<p><i>New allocation. Within Flood Zone 1. No risk of surface water or groundwater flooding.</i></p>
<p><i>RSA14: Land adjoining Lynch Lane, Lambourn</i></p>	<p><i>Retained allocation from the HSA DPD. The site does not have planning permission.</i></p> <p><i>Within Flood Zone 1 and not at risk of surface water flooding.</i></p> <p><i>Groundwater levels between 0.025m and 0.5m below surface. Jacobs groundwater modelling indicates that the site is at risk of groundwater emergence in a 1 in 30 year event. The Lead Local Flood Authority have not indicated</i></p>

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
	<p>that there have been any incidences of groundwater flooding on the site.</p> <p>The site specific policy for the site requires a FRA which must take account of all potential sources of flood risk, including groundwater emergence. As part of the FRA consideration will also be given to the provision of SuDS on the site, along with necessary mitigation measures;</p>
<p>RSA15: Land at Newbury Road, Lambourn</p>	<p>Retained allocation from the HSA DPD. The site has full planning permission.</p> <p>Within Flood Zone 1, and not at risk of surface water flooding. Groundwater levels between 0.025m and 0.5m below surface. Jacobs groundwater modelling indicates that the site is at risk of groundwater emergence in a 1 in 30 year event. The Lead Local Flood Authority have not indicated that there have been any incidences of groundwater flooding on the site.</p> <p>The site specific policy for the site requires a FRA which must take account of all potential sources of flood risk, including groundwater emergence. As part of the FRA consideration will also be given to the provision of SuDS on the site.</p>
<p>RSA16: Land North of Southend Road, Bradfield Southend</p>	<p>New allocation.</p> <p>Within Flood Zone 1. No risk of surface water flooding. The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates no risk of groundwater flooding on the northern part of the site. On the southern part of the site groundwater levels are at least 5m below the ground surface.</p>
<p>RSA17: Land at Chieveley Glebe, Chieveley</p>	<p>New allocation. Within Flood Zone 1. Not at risk of surface water flooding. The eastern half of the site is not at risk of groundwater flooding. On the eastern half of the site, groundwater levels are between 0.5 and 5m below the surface of the ground.</p>
<p>RSA18: Pirbright Institute Site, High Street, Compton</p>	<p>Retained allocation from the HSA DPD. The site has outline planning permission.</p> <p>Small areas of the site are at risk of flooding; however, development can be accommodated outside of these areas.</p> <p>Majority of site within Flood Zone 1, although southern site boundary within Flood Zones 2 and 3. Groundwater levels between 0.5m and 5m below surface.</p> <p>The site allocation policy for the site does not permit any development within Flood Zones 2 and 3. The approved masterplan for the site does not include any development in this area.</p>

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
<i>RSA19: Land west of Spring Meadows, Great Shefford</i>	<p><i>New allocation. Small areas of the site are at risk of flooding; however development can be accommodated outside of these areas.</i></p> <p><i>Within Flood Zone 1.</i></p> <p><i>The site is at low risk of surface water flooding. The north east corner of the site is at risk of flooding from a surface water flow path during a 1 in 1000 year rainfall event, which then drains into the Great Shefford Stream. An area of surface water ponding is also predicted to form beyond the northern boundary of the site during a 1 in 100 year rainfall event.</i></p> <p><i>The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that groundwater levels are between 0.5 and 5m below the ground surface. However, the SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs groundwater modelling indicates that the site was subject to groundwater flooding in 2014, however the Lead Local Flood Authority have commented that groundwater emergence was recorded during the 2014 flood event at the north east quarter of the site.</i></p> <p><i>Criterion (g) of the site specific policy requires that the scheme be informed by a FRA and that development is avoided on the small part of the site where there is the surface water flow path, and where groundwater emergence was recorded.</i></p>
<i>RSA20: Land off Charlotte Close, Hermitage</i>	<p><i>Retained allocation from the HSA DPD. The site has full planning permission.</i></p> <p><i>Small areas of the site are at risk of flooding; however development can be accommodated outside of these areas.</i></p> <p><i>Within Flood Zone 1. No risk of groundwater flooding.</i></p> <p><i>North western corner of site at risk of surface water flooding in a 1 in 30-year event. Western site boundary at risk in a 1 in 1000 year event. There is an ordinary watercourse in a culvert beneath the site.</i></p> <p><i>Criterion (c) of the site specific policy requires a FRA and for there to be a 10m wide undeveloped buffer zone to the culvert.</i></p> <p><i>The approved plans do not include any development in the areas at risk of flooding.</i></p>
<i>RSA21: Land to the south east of the Old Farmhouse, Hermitage</i>	<p><i>Retained allocation from the HSA DPD. The site has outline and Reserve Matters planning permission.</i></p>

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
	<p>Small areas of the site are at risk of flooding; however development can be accommodated outside of these areas.</p> <p>Within Flood Zone 1. No risk of groundwater flooding.</p> <p>The south eastern and north western site corners at risk of surface water flooding in a 1 in 1000 year event. There is an ordinary watercourse in a culvert beneath the site.</p> <p>Criterion (f) of the site specific policy requires a FRA and for there to be a 10m wide undeveloped buffer zone to the culvert.</p> <p>The approved plans do not include any development in the areas at risk of flooding.</p>
RSA22: Land adjacent Station Road, Hermitage	<p>New allocation. Small areas of the site are at risk of flooding; however development can be accommodated outside of these areas.</p> <p>Within Flood Zone 1 and no risk of groundwater flooding.</p> <p>Two low risk flow paths travel through the centre of the site. At the site centre the flow paths converge, leading to two high risk pooling areas. Along the access to Marlston Road there is an area of high risk flooding. Flood risk covers ≈20% of the site.</p> <p>Criterion (j) of the site specific policy requires a FRA to inform the delivery of the site.</p>
RSA23 Land adjoining The Haven, Kintbury	<p>New allocation. The site is within Flood Zone 1. There is no risk of surface or groundwater flooding.</p>
Gypsies, Travellers and Travelling Showpeople Allocations	
RSA24: New Stocks Farm, Paices Hill, Aldermaston	<p>Retained allocation from the HSA DPD. Small areas of the site are at risk of flooding; however development can be accommodated outside of these areas.</p> <p>Within Flood Zone 1. North western corner of site boundary at risk of surface water flooding in a 1 in 1000 year flood event.</p> <p>The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that groundwater levels are between 0.025m and 0.5m below the ground. However, the SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs mapping does not show any risk to the site.</p>
RSA25: Long Copse Farm, Enborne	<p>Retained allocation from the HSA DPD. Small areas of the site are at risk of flooding; however development can be accommodated outside of these areas.</p> <p>Within Flood Zone 1. The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater</p>

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
	<p><i>Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that the site is not at risk of groundwater flooding.</i></p> <p><i>The northern site boundary and the far north eastern part of the site are at risk of surface water flooding in a 1 in 30 year flood event.</i></p> <p><i>There is a watercourse that runs through the site.</i></p> <p><i>Criterion (l) of the site specific policy requires that a 5m buffer is required between the watercourse and any proposed plots.</i></p>
Employment land allocations	
<p><i>ESA1: Land east of Colthrop Industrial Estate, Thatcham</i></p>	<p><i>New allocation. Small areas of the site are at risk of flooding; however development can be accommodated outside of these areas.</i></p> <p><i>Within Flood Zone 1. The north western part of the site and the southern and eastern site boundaries are at risk of surface water flooding in a 1 in 1000 year event. The southern half of the site is not at risk of groundwater flooding. At the northern half of the site, groundwater levels are within 0.025m of the ground surface.</i></p> <p><i>The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that on the southern half of the site, there is no risk of groundwater flooding. At the northern half of the site, groundwater levels are within 0.025m of the ground surface. However, the SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not indicated that there have been any incidences of groundwater flooding on the site.</i></p> <p><i>Criterion (g) of the site specific policy requires development to be informed by a FRA, which will include flood mitigation measures.</i></p> <p><i>The site has outline planning permission. The approved plans do not include any development in the areas at risk of flooding.</i></p>
<p><i>ESA2: Land west of Ramsbury Road, Membury Industrial Estate</i></p>	<p><i>New allocation. Within Flood Zone 1. No risk of surface or groundwater flooding.</i></p>
<p><i>ESA3: Land to the south of Trinity Grain, Membury</i></p>	<p><i>New allocation. Within Flood Zone 1. No risk of surface or groundwater flooding.</i></p>

Allocation	Does any part of the site lie within Flood Zone 2 and/or 3, or otherwise identified as being at risk of flooding?
<i>ESA4: Beenham Landfill, Beenham</i>	<p><i>New allocation. Small area of the site is at risk of flooding; however development can be accommodated outside of this area.</i></p> <p><i>Within Flood Zone 1. No risk of groundwater flooding. South eastern site corner at risk of surface water flooding in a 1 in 30 year event.</i></p> <p><i>Criterion (f) of the site specific policy requires a FRA to inform development.</i></p>
<i>ESA5: Northway Porsche, Grange Lane, Beenham</i>	<p><i>New allocation. Small area of the site is at risk of flooding; however development can be accommodated outside of this area.</i></p> <p><i>Within Flood Zone 1. The south western corner of the site is at risk of surface water flooding in a 1 in 1000 year event.</i></p> <p><i>The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that groundwater levels are within 0.025m of the ground surface. However, the SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not indicated that there have been any incidences of flooding.</i></p> <p><i>Criterion (f) of the site specific policy requires a FRA to inform development.</i></p>
<i>ESA6: Land adjacent to Padworth IWMF, Padworth</i>	<p><i>New allocation. Small area of the site is at risk of flooding; however development can be accommodated outside of this area.</i></p> <p><i>Within Flood Zone 1. Three small areas along the western site boundary are at risk of surface water flooding in 1 in 1000 year event.</i></p> <p><i>The SFRA has used two datasets to assess groundwater flood risk – Jacobs Groundwater Mapping and Modelling, in addition to the JBA Flood Map. The JBA flood map indicates that groundwater levels are within 0.025m of the ground surface. However, the SFRA comments that the JBA Flood Map should not be used as the sole evidence for land use planning, and instead it should be used in combination with other data such as local and historic data. The Jacobs mapping does not show any risk to the site. The Lead Local Flood Authority have not indicated that there have been any incidences of flooding.</i></p> <p><i>Criterion (e) of the site specific policy requires a FRA to inform development.</i></p>

Housing Requirement

Inspector:

To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. Strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need can be met over the plan period¹⁹.

Policy SP12 states that provision will be made for 8,721 to 9,146 net additional homes per year between 2022 and 2039 (513 to 538 per year) and goes on to advise that the target of 538 does not constitute a cap to development.

Paragraph 6.2 of the Plan states that local housing need calculated using the standard methodology is 513 dwellings per year based on 2022 data. Paragraph 6.5 refers to Reading Borough Council having identified a shortfall of 230 dwellings in their current local plan period to 2036. Paragraph 6.7 refers to a review of the Reading local plan being required by 2024 and the principle of meeting any unmet need in the Western Berkshire housing market area. Paragraph 6.9 refers to 5% on top of local housing need to boost supply and to have some built-in flexibility.

PQ24. (a) What is the minimum housing requirement figure for the District – 513 or 538 dwellings per year?
(b) Does the Plan intend to meet the shortfall of 230 dwellings identified by Reading Borough Council in the period to 2036?
(c) Is the intention that the annual five year housing requirement will be calculated on the basis of 513 or 538 dwellings per year?

Council response:

a) The minimum housing requirement is 513 dwellings per year.

b) As set out in the supporting text to policy SP12 (Approach to Housing Delivery) of the Proposed Submission Local Plan Review 2022-2039 (CD1), the local authorities which make up the Western Berkshire Housing Market Area (HMA) have agreed a Statement of Common Ground for the purposes of local plan-making. This continues to recognise Reading's unmet need set out in the Reading Local Plan and the principle that the need should be met within the West Berkshire HMA. This agreement relates only to Reading's need as calculated by the Strategic Housing Market assessment (SHMA).

¹⁹ NPPF 60 and 65.

Whilst the distribution of the unmet need has not been agreed, some of Reading's unmet need (average of 14 dwellings pa from 2019 to 2036) can in theory be met through the housing requirement range identified in the LPR which seeks to ensure delivery above the minimum LHN.

It is acknowledged that this matter is due to be revisited as part of Reading Borough Council's Local Plan Review, due to commence in 2023, given that the standard methodology would significantly increase Reading's housing need.

In its response to the consultation of the Regulation 19 Proposed Submission Local Plan Review 2022-2039, Reading Borough Council commented (response id: PS534):

"The policy proposes meeting the identified local housing need for West Berkshire in full, and expresses a range with local housing need at the lower end of the range. There is therefore flexibility to deliver housing over and above local housing need. RBC therefore supports the policy.

As recognised in the supporting text, the Reading Borough Local Plan includes a small unmet housing need of 230 homes over the plan period to 2036, based on the level of need assessed during the Strategic Housing Market Assessment. This matter is subject to a Memorandum of Understanding between WBDC, RBC, Wokingham Borough Council and Bracknell Forest Council signed in August 2021. This plan does not specifically make any allowance for meeting these unmet needs, but we recognise that the flexibility inherent in the dwelling range expressed, in combination with the plans of other authorities, will enable these unmet needs to be met. This matter will however need to be revisited as part of RBC's Local Plan Review, due to commence in 2023, given that the standard methodology would significantly increase Reading's housing need. It should therefore be noted that the matter of unmet housing need will need to be revisited in a future Local Plan review."

The Council therefore believes it would be helpful to clarify the situation in the supporting text of policy SP12 by amending paragraph 6.7 to include:

The Council will continue to work with the other authorities in the HMA to address this issue once Reading Borough Council has a more complete picture of its LHN as calculated by the standard methodology.

c) The PPG (ID: 68-027-20190722 and ID:68-039-20190722) is clear that both the five-year housing land supply (5YHLS) and the Housing Delivery Test (HDT) will be measured against the lower end of the range. That ensures that authorities that plan to exceed the LHN are not penalised for their ambition with the risk of policies been deemed to be out of date, or the presumption in favour of sustainable development being applied, if delivery or supply falls short of the upper end of the range.

The five-year housing requirement will therefore be calculated on the basis of 513 dwellings.

Housing supply for the plan period

Inspector:

Paragraphs 6.11 to 6.23 in the Plan describe various sources of housing land supply:

- Allocations in existing plans retained and included in the Plan
- Allocations in existing plans that are at an advanced stage of construction (not included as allocations in the Plan)
- Unallocated sites that have planning permission
- Windfall allowance for sites of fewer than 10 dwellings
- Sites to be allocated in neighbourhood plans
- New allocations in the Plan

The Plan does not seem to set out what the overall total supply of net additional dwellings is expected to be from those sources. The Housing Background Paper includes a summary table that indicates a total supply of 9,137 net units as at 31 March 2022²⁰.

PQ25. (a) Is the overall land supply identified in the Plan expected to have capacity for a total of 9,137 net additional dwellings in the period 2022 to 2039? (b) Is that land supply expected to be sufficient to ensure that the housing “target” of 9,146 dwellings can be met during that period?

Council response:

PQ25a) Yes. Various sources will ensure that there is a continuous housing supply across the plan period. As set out in in the summary table in the Housing Background Paper ([HOU6](#)), these sources total 9,137 dwellings.

The supporting text to Policy SP12 (Approach to Housing Delivery) as currently written does not clearly set out what the total supply is and the Council propose modifications set out below to clarify the supply position. In addition, one further site needs to be considered within the supply and the reasons for this are also set out below.

Following the submission of the Local Plan Review, officers were made aware that an unallocated site with planning permission for 160 dwellings which was originally thought to have lapsed was in fact extant (Land off Faraday Plaza and Kelvin Road, Newbury). The permission is confirmed to be extant by virtue of the setting out of the road, reduced level dig (excavation), and back-filling.

The overall land supply with the inclusion of the 160 units on Land off Faraday Plaza and Kelvin Road, Newbury is 9,297 dwellings.

²⁰ HOU6 Table 3.4

However, the response to PQ19 states that while the plan period is 15 years from adoption, this does not cover the full financial years post adoption. The Council therefore propose to make a modification within its response to PQ19 to add the additional required years to the plan period. As the Plan is now likely to be adopted in 2025, the plan period will be extended to 2040/41. See response to PQ19.

With this proposed modification in mind, Policy SP12 will therefore also need to be modified to include an extra two year's provision. As such, the overall housing requirement for the Plan period would be 9,747 to 10,222 – see response to PQ19 for proposed modifications.

Extending the Plan period by a further two years will also have an impact upon the housing supply, as the Council needs to include a small site windfall allowance for these additional years. This results in a total housing supply of 9,577 dwellings. The extant permission at Land off Faraday Road and Kelvin Road, Newbury (as mentioned above) is also accounted for in this figure. The supply figures are correct as of September 2023, and may be subject to change once the monitoring of planning commitments 2022/2023 is completed and taken into consideration.

The Council propose to make the following modifications to the supporting text to Policy SP12 to reflect updates in the supply:

Supporting text

Existing planning commitments on unallocated sites

6.16. Existing permissions for housing on non-allocated sites will also contribute to the supply, over ~~1,958~~ 2,118 units on windfall sites, those not specifically identified in the development plan, already had permission or prior approval for permitted development at 31 March 2022.

Windfall

6.20. The Council has assessed the contribution likely to be made from windfall sites based on past trends. It is clear that windfall sites have consistently played an important role in the housing supply of the District: approximately 74% of completions in the period 2006-2022 were on unallocated, windfall sites. The windfall allowance, of 140 dwellings per annum is, in comparison, relatively modest. It has been based on the average annual delivery on small sites of less than 10 units over the existing plan period 2006 – 2022. The calculated allowance set out in Table 2 takes account of existing small permissions that are already included in the supply by deducting these from the allowance of 140 dpa over the period 2022 to ~~2039~~ 2041. Any future windfall sites of 10 units or more are not included in the calculations of future supply, which introduces flexibility and means that any allocations of medium or large sites within settlement boundaries will not result in any double-counting.

Housing supply at ~~March 2022~~

6.21. Part 1 of Table 2 shows the committed supply position at 31 March 2022. 31 March 2022 is the date when the annual monitoring of development takes place. As aforementioned, for the purposes of calculating the housing supply, if a site has

planning permission, then the number of dwellings permitted, or already built, has been taken into account in the table.

Table 2: Housing supply at 31 March 2022

Supply category	Net outstanding units
3. Committed supply at 31 March 2022	
Local Plan retained allocations	
• Core Strategy: Sandford Park Strategic Site	1,580
• Housing Site Allocations DPD Sites	990
Subtotal	2,570
Neighbourhood Development Plan allocation	
• Stratfield Mortimer NDP Site	82
Subtotal	2,652
Local Plan allocations not being retained (due to site being at an advanced stage of construction)	
• Core Strategy: Newbury Racecourse	465
• HSA DPD Sites	256
Subtotal	721
Existing planning commitments on unallocated sites	1,958 2,118
Existing planning commitments for C2 Use Class communal accommodation	57
Small site Windfall allowance to 2039 2041	1,949 2,229
Total committed supply	7,337 7,777
4. Future supply	
New allocations within the LPR	1,720
Sites to be allocated in Neighbourhood Development Plans	
• Hungerford	55
• Lambourn	25
Subtotal	80
Total future supply	1,800
Total housing supply	9,577

Future supply

6.21. In order to meet the target of 538 new dwellings per annum over the plan period, sites for a further ~~1,809~~ 2,445 dwellings need to be found (requirement of ~~9,146~~ 10,222 minus committed supply of ~~7,337~~ 7,777).

6.22. Part 2 of Table 2 shows that allocations will be identified to accommodate 80 dwellings within the NDPs for Hungerford and Lambourn. This leaves a remaining 2,365 dwellings to be identified through new allocations in the LPR.

6.23 There also needs to be some built in flexibility to allow for phasing issues and for an element of non-delivery. The expression of the requirement as a range and the use of a relatively modest windfall allowance both add to the flexibility required to ensure that targets can be met.

PQ25b) As submitted, the Plan shows a very small undersupply against the housing “target” (9 dwellings). As discussed in the response to PQ25 (a) above, a site with extant planning permission (160 units on Land off Faraday Plaza and Kelvin Road, Newbury) which was originally omitted from the supply needs to be taken into account. The inclusion of this site means that the land supply is sufficient to ensure that the “target” of 9,146 dwellings can be met over the Plan period.

However, as detailed in the response to PQ25 (a) above, the Council propose to extend the Plan period to 2040/41. The implication of this is that there will be a shortfall of 645 dwellings against the housing “target”.

Five year housing land supply

Inspector:

Planning policies should identify a supply of specific, deliverable sites for years one to five of the plan period with an appropriate buffer. The Council will need to update annually a supply of specific, deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement in the Plan once it has been adopted²¹.

Appendix 8 in the Plan sets out a housing trajectory. Further details about the trajectory are included in the Housing Background Paper²².

PQ26. What was the five year housing land requirement, including an appropriate buffer, on 1 April 2022 based on an annual requirement of (a) 513 and (b) 538 dwellings per year?

Council response:

(a) 513 dwellings per year

The five year housing land requirement, reflecting the annual requirement of 513 dwellings per year, was 2,693 dwellings. This takes into account a 5% buffer applied for meeting the requirement of the Housing Delivery Test. The five year housing land supply for the five year period beginning 1 April 2022 was 6.4 years.

(b) 538 dwellings per year

The five year housing land requirement, reflecting the annual requirement of 538 dwellings per year, was 2,825 dwellings. This takes into account a 5% buffer applied for meeting the requirement of the Housing Delivery Test. The five year housing land supply for the five year period beginning 1 April 2022 was 6.1 years.

PQ27. What was the five year supply of specific, deliverable sites on 1 April 2022? This should be broken down into overall figures for (a) sites with full planning permission and sites with outline planning permission for fewer than 10 dwellings; (b) other specific identified sites; and (c) any windfall allowance.

²¹ NPPF 68 and 74.

²² HOU6 Appendices 1, 2 and 3.

Council response:

The five year housing land supply, based on the housing trajectory at 1 April 2022, was 6.4 years.

The table below sets out the breakdown for difference sources of land supply of specific, deliverable sites on 1 April 2022, including communal accommodation (row G), was 3,448 dwellings.

- (a) Figures in rows A & B shows category (a) sites with full planning permission and figures in row C shows sites with outline planning permission for fewer than 10 dwellings. There were 2,922 dwellings in total.
- (b) Figures in rows D & E shows category (b) other specific identified sites, which includes sites with outline planning permission for 10 or more dwellings. There were 200 dwellings in total.
- (c) Figures in row F shows category (c) any windfall allowance. There were 269 dwellings in total.

		No. of dwellings
A. Sites with full planning permission for fewer than 10 dwellings		432
- Allocated sites in the current Local Plan	5	
- Unallocated sites in the current Local Plan	427	
B. Sites with full planning permission for 10 or more dwellings		2,486
- Allocated sites in the current Local Plan	1,277	
- Unallocated sites in the current Local Plan	1,209	
C. Sites with outline permission for fewer than 10 dwellings		4
- Allocated sites in the current Local Plan	0	
- Unallocated sites in the current Local Plan	4	
D. Sites with outline permission for 10 or more dwellings		200
- Allocated sites in the current Local Plan	200	
- Unallocated sites in the current Local Plan	0	
E. Other specific identified sites (allocated sites without planning permissions)		0
F. Windfall allowance on small sites		269
G. Communal accommodation (dwelling equivalent)		57
Total deliverable sites including communal accommodation		3,448

PQ28. For each site that falls into category (b) referred to in PQ27 above, what is the Council's clear evidence that housing completions will begin in five years?

Council response:

According to NPPF's definition of deliverable²³, for sites with full planning permission and sites with outline planning permission for fewer than 10 dwellings, NPPF is clear that these should be assessed as being deliverable within 5 years unless there is specific evidence to the contrary.

For sites with outline planning permission only for 10 or more dwellings and allocated sites in the current development plan without planning permission, specific evidence is required to demonstrate that housing completions will begin on site within 5 years.

The Planning Practice Guide provides additional guidance (PPG, Paragraph 007, Reference ID: 68-007-20190722) on deliverability stating that evidence may include:

- *Current planning status – for example, on larger scale sites with outline or hybrid permission how much progress has been made towards approving reserved matters, or whether these link to a planning performance agreement that sets out the timescale for approval of reserved matters applications and discharge of conditions;*
- *Firm progress being made towards the submission of an application – for example, a written agreement between the local planning authority and the site developer(s) which confirms the developers' delivery intentions and anticipated start and build-out rates;*
- *Firm progress with site assessment work; or*
- *Clear relevant information about site viability, ownership constraints or infrastructure provision, such as successful participation in bids for large-scale infrastructure funding or other similar projects.*

When assessing the deliverability of sites, the Council produced a site deliverability form that was sent to agents or developers of:

- *sites proposed for allocation in the Local Plan Review;*
- *sites allocated within the current Local Plan but which are not being retained as allocations in the Local Plan Review due to development being in progress;*
- *sites with planning permission for communal accommodation (Use Class C2);*
- *unallocated sites with planning permission for 10 or more units; and*
- *sites identified through the prior approval process for 10 or more units.*

²³ NPPF Annex 2: Glossary

Responses have been used to both assess deliverability of the site and to phase dwelling completions in the housing trajectory. The completed forms as well as any email responses received are included in Appendix 3 in the Housing Background Paper ([HOU6](#)).

The Council considers the information on delivery provided by the landowner / developer as the most robust source and uses this as the starting point for considering what might reasonably be delivered within the five year period. Where necessary, the Council has adjusted the projected delivery to take account of any overly optimistic view, ensuring that the figures relied on by the Council within the five year period are as realistic as possible.

For sites that falls into category (b) other specific identified sites, which includes sites with outline planning permission only for 10 or more dwellings and allocated sites in the current development plan without planning permission, the Council considers that only 1 site is deliverable within 5 years, which is SP16 Sandford Park Newbury – East. It is an allocated site in the current development plan. Outline planning permission (planning application reference no.: 20/01238/OUTMAJ) for 1,000 units and 80 extra care housing units (C3) was allowed on appeal in May 2022. Given that the site has an outline planning permission and firm progress has been made towards submission of reserved matters including site assessment works and drafting of a planning performance agreement (planning application reference no.: 23/01562/PPA), there is clear evidence that housing completions will begin on this site within 5 years.

PQ29. Does the housing trajectory demonstrate that a supply of specific, deliverable sites sufficient to provide a minimum of five years' worth of housing against the housing requirement in the Plan will be maintained annually?

Council response:

Although the housing trajectory shows that there is a drop of projected housing supply in 2025/26 and 2026/27 below the housing requirement (513 dwellings per year), cumulatively the Council can demonstrate a supply of 6.4 years for the five year period from 1 April 2022 to March 2027²⁴. This supply forms the early part of the supply set out in the housing trajectory. The Council propose a modification to the trajectory to include the housing requirement line for the 513 figure.

This is because there were a lot of sites with full planning permissions that were under construction at 1 April 2022 and those sites were anticipated to be completed between 2022/23 and 2024/25. In 2025/26 to 2026/27 the projected housing supply relied on housing delivery from a few large sites and small site windfall allowance. Information on delivery is sought from the landowner / developer and is used as the starting point for considering lead in time and build out rate assumptions. However, it

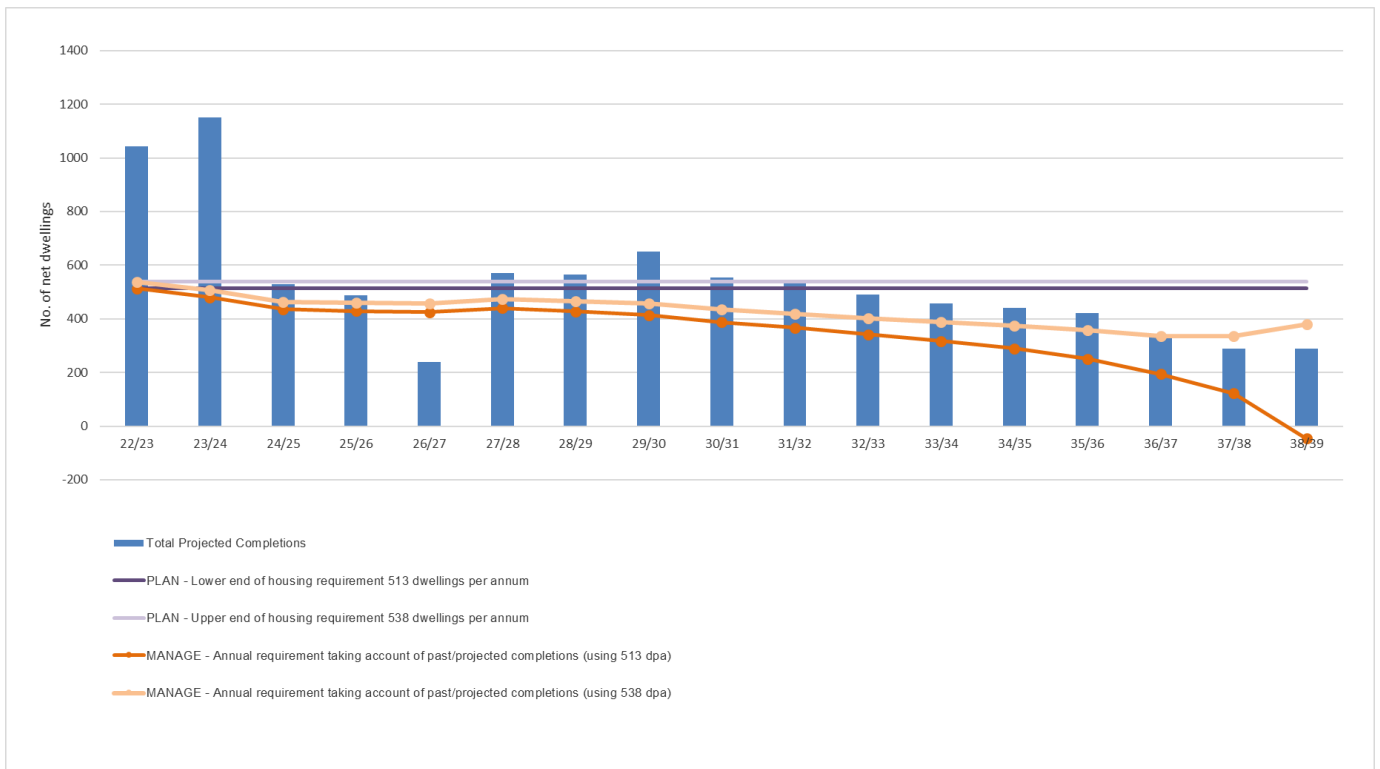
²⁴ Five Year Housing Land Supply at November 2022 (November 2022): <https://info.westberks.gov.uk/media/53681/Five-Year-Housing-Land-Supply-November-2022/pdf/Five-Year-Housing-Land-Supply-at-November-2022.pdf?m=638065405490830000>

may be possible that not all dwellings will be delivered between 2022/23 and 2024/25 and some housing completions will slip into 2025/26 and 2026/27.

The five year housing land supply assessment will be reviewed on an annual basis to ensure that the Council can maintain an ongoing five year housing land supply. In addition, the housing trajectory of future housing delivery will be adjusted as part of this work to reflect longer lead-in times and / or slower build-out rates if any.

Appendix 8 Housing Trajectory

Housing Trajectory 2022/23 – 2038/39



Major development in North Wessex Downs Area of Outstanding Natural Beauty (AONB)

Inspector:

Policy SP2 states that planning permission for major development in the AONB will be refused other than in exceptional circumstances and sets out various criteria to inform decision making for such proposals. Policy SP15 lists 10 allocations for residential development comprising 10 or more homes in the AONB (5 of which are allocations carried forward from the existing adopted plan). A total of 334 homes are proposed on those 10 sites. Chapter 5 of the Housing Background Paper²⁵ sets out what the Council considers to be the exceptional circumstances to justify allocating the 10 sites for major residential development in the AONB based on the tests set out in NPPF 177.

PQ30. Is it the intention that proposals for the development of the 10 allocations in the AONB will be required to demonstrate exceptional circumstances at the time of the planning application? Or will proposals that meet the requirements of the relevant site allocation policy, along with other relevant policies, be deemed to be in accordance with the development plan and consistent with national policy?

Council response:

The Council can confirm that it is the intention that proposals that meet the requirements of the relevant site allocation policy, along with other relevant policies, will be deemed to be in accordance with the development plan and consistent with national policy. This is because Chapter 5 of the Housing Background Paper ([HOU6](#)) sets out what it considers to be the exceptional circumstances to justify allocating the 2 sites for major residential development in the AONB based on the tests set out in NPPF 177. Similarly, the Employment Background Paper ([EMP5](#)) sets out what it considers to be the exceptional circumstances to justify allocating the 10 sites for major employment land in the AONB based on the tests set out in NPPF 177.

The Council considers that it would be helpful if this was clarified in the LPR and so proposes to add to the supporting text of Policy SP2 to make this clear as follows -

As part of the development of the LPR the Council has demonstrated the exceptional circumstances which justify allocating the sites identified in the LPR within the AONB. Therefore, proposals that meet the requirements of the relevant site allocation policy, along with other relevant policies, will be deemed to be in accordance with the development plan and consistent with national policy.

²⁵ HOU6.

Inspector: Policy SP15 sets a requirement for the Hungerford and Lambourn neighbourhood plans to identify sites for 55 and 25 homes respectively.

PQ31. Is it expected that the requirements for 55 homes in Hungerford and 25 in Lambourn will be met through major developments on sites identified in the neighbourhood plans? If so, would those neighbourhood plans be expected to demonstrate exceptional circumstances to justify the allocations and/or would this be required at the planning application stage?

Council response:

The NPPF (para 177) states that permission should be refused for major development in the AONB other than in exceptional circumstances, where it can be demonstrated that the development is in the public interest. Consideration needs to include:

- The need for development, including in terms of any national considerations, and the impact of permitted/refusing the development on the local economy*
- The cost of, and scope for, developing outside the AONB or meeting the need in some other way*
- Any detrimental effect on the environment, landscape and recreational opportunities, and the extent to which that could be moderated.*

While NPPF 177 relates to the consideration of applications for development, where a local plan or a neighbourhood plan (NDP) seeks to allocate sites which would meet the definition of major development in the AONB it is considered appropriate to carry out the test as part of that process to ensure the allocation would have a reasonable prospect of being delivered.

If adopted by the Council, a NDP would form part of the development plan. The Council can therefore confirm that should any sites (either for residential and/or employment land) within the North Wessex Downs AONB be allocated for major development through the NDP process, then the relevant NDP would be expected to demonstrate the exceptional circumstances that would justify allocating those sites based on the tests set out in NPPF 177.

The Council considers that it would be helpful if this was clarified in the LPR and so proposes to add to the supporting text of Policy SP2 to make this clear as follows -

The exceptional circumstances necessary to justify the allocation of any sites for major development within NDPs will be expected to be demonstrated through individual neighbourhood plans. Proposals that meet the requirements of the relevant site allocation policy in the neighbourhood plan, along with other relevant policies in the development plan, will be deemed to be in accordance with the development plan and consistent with national policy.

Sandleford Park and North East Thatcham strategic site allocations

Inspector:

Policy SP16 allocates the Sandleford Park strategic site to the south of Newbury for a residential development comprising approximately 1,500 dwellings. Policy SP17 proposes that approximately 1,500 dwellings be completed in the plan period on the North East Thatcham strategic site.

NPPF 22 advises that where larger scale developments, including significant extensions to existing towns, form part of the strategy for the area, policies should be set within a vision that looks ahead at least 30 years to take into account the likely timescale for delivery.

**PQ32. (a) Are either of the Sandleford Park or North East Thatcham strategic sites expected to continue to be developed after 2039?
(b) If so, how many additional homes to the 1,500 referred to in the Plan are expected on the site(s) and in what timescale?**

Council response:

PQ32a) It is not currently anticipated that these sites will continue to be developed after 2039.

PQ32b) None, see response to a) above. The Housing Trajectory is included in Appendix 8 of the LPR ([CD1](#)).

PQ33. Are policies SP16 and SP17 set within a long term vision that takes into account the likely timescales for delivery of the Sandleford Park and North East Thatcham strategic sites?

Council response:

Yes, the West Berkshire Strategic Vision 2050 was published in November 2022 ([SET3](#)) and responds to the requirements of paragraph 22 in the NPPF. The Vision provides a strategic context for future development in Newbury and Thatcham over the longer-term period up to 2050 and has been used to inform the policies in the LPR.

The Council propose the following modifications to the LPR with regard to the West Berkshire Strategic Vision 2050.

*Insert additional text to the end of paragraph 4.11 to read:
Future growth for Newbury and Thatcham has been set in the context of a long-term Vision developed for both towns, ensuring growth is sustainable in the longer term.*

Amend paragraph 6.41 to read:

In reviewing the vision for Newbury as part of the LPR, ~~the town will remain a focus for development~~ the Council prepared the West Berkshire Strategic Vision 2050, which offers a clear spatial steer as to where growth in Newbury and Thatcham might go over the longer-term period up to 2050. Newbury will ~~retain~~ remain a focus for development whilst retaining its traditional market town heritage and

Insert additional text to the end of paragraph 6.42 to read:

Newbury, as part of the Newbury and Thatcham urban area, is a sustainable location for development as confirmed in the Strategic Vision 2050.

Amend paragraph 6.54 to read:

In reviewing the vision for Thatcham as part of the LPR, the Council prepared the West Berkshire Strategic Vision 2050, which offers a clear spatial steer as to where growth in Newbury and Thatcham might go over the longer-term period up to 2050. In addition, and in order to best understand how to plan for growth

Insert additional text within paragraph 6.60 to read:

.... settlement hierarchy (contained in Policy SP3). Thatcham, as part of the Newbury and Thatcham urban area, is a sustainable location for development as confirmed in the Strategic Vision 2050. The TSGS

Gypsy and Traveller Accommodation

Inspector:

National policy expects strategic policies, as a minimum, to provide for objectively assessed needs to be met including the housing needs for different groups in the community²⁶.

Table 7 in the Plan identifies a net shortfall of 30 pitches for gypsy and traveller accommodation between 2021 and 2038. Paragraph 11.29 identifies a need for 4 transit pitches to accommodate 8 caravans.

Paragraph 11.31 refers to a number of transit pitches on an existing site being converted to permanent pitches. Policy RSA24 allocates a site at New Stocks Farm, Paices Hill, Aldermaston for the replacement of 8 transit pitches with 8 permanent pitches. Paragraph 11.32 refers to a Council operated site being refurbished and having 17 pitches when it reopens. Paragraph 11.33 refers to a number of authorised small private traveller sites in the district. It is not clear how those sites, or the changes described to them, would help to address or otherwise affect the identified need for 30 additional permanent and 4 transit pitches.

Paragraph 11.35 advises that a separate development plan document will be prepared to address the longer term need for gypsy and traveller pitches and for transit sites with the intention that it will be adopted in 2027.

PQ34. How will the existing and allocated gypsy and traveller sites in the district contribute to addressing the identified shortfall of 30 pitches between 2021 and 2038 and the need for 4 additional transit pitches? How many permanent and transit pitches are expected to be required on land outside the existing authorised and allocated sites?

Council response:

Paragraphs 11.31 and 11.32 of the supporting text to Policy DM20 set out the supply position. The existing sites do not contribute to future supply, having already been counted as existing supply. The exception, as explained below is the site Four Houses Corner. However, the allocated site at New Stocks Farm at Paices Hill, as explained below, does aid in contributing to addressing the identified shortfall by the provision of 8 permanent pitches.

The table below highlights the 5 year and longer term need, and the supply of sites, as is the current position. Policy RSA24 allocates the site at New Stocks Farm, Paices Hill, replacing 8 transit pitches with 8 permanent pitches. This now has the benefit of planning permission. The Council operated site at Four Houses Corner is counted in the GTAA ([HOU3a](#) and [HOU3b](#)) as having 16 pitches. The site residents have been decanted pending refurbishment of the site, and a planning application

²⁶ NPPF 11b and 62.

has been submitted for 17 pitches. This therefore counts as an additional pitch in the supply.

Since the GTAA was refreshed in 2021 ([HOU3b](#)), an additional site was approved permission on appeal for 1 pitch. Although this is a personal consent it still meets the need of Gypsies and Travellers, and therefore also counts as an additional pitch in the supply.

Although the Council has a 5 year supply when measured against the PPTS need, there is still an overall need for 3 pitches in the short term when considered against the cultural need. Over the longer term there is a cultural need for 17 pitches, of which 11 pitches is PPTS need when applying the PPTS filter. Two Planning Inspectors for two recent appeals (land at Ermin Street, Lambourn Woodlands APP/W0340/W/22/3292939, and land at Lawrence's Lane, Thatcham APP/W0340/W/22/3292211) were content with the Council's position on supply, and agreed it had a 5 year housing land supply.

Taking the above allocations and commitments into account, in the short term, to 2025/26, there is a need for 3 permanent pitches, and in the longer term, between 2026/27 and 2037/38, there is a need for a further 17 permanent pitches. Up to 2037/38 this equates to a total of 20 permanent pitches. 4 transit pitches would be required, and no sites are identified in the Local Plan Review. The GTAA consultant does not consider the 8 transit pitches converted to 8 permanent pitches at Paices Hill would need to be replaced, as there were strict policies on the length of stay and who could stay on site, meaning they were not considered to be 'true' transit sites. Instead the Council are recommended to consider tolerated stopping places. This would be explored alongside the provision of transit sites, and the shortfall in supply of permanent sites, in the Gypsy and Traveller Accommodation Development Plan Document (GTA DPD).

For clarity it is proposed through a modification to replace Table 7 within the supporting text of DM20 with the table below as it is considered the below table provides a clearer position of the requirements versus the supply. Though supply is not static, the title would need to make clear that it is the situation as of September 2023.

Table 7 Gypsy and Traveller Accommodation Assessment Identified Need 2021/22 to 2037/38 cultural need/PPTS need. Supply as of September 2023

<u>Table Addressing Gypsy and Traveller pitch need updated</u>		
<u>West Berkshire</u>	<u>Cultura I need</u>	<u>Of which PPTS NEED</u>
<u>5yr Authorised Pitch Shortfall (2021/22 to 2025/26) (A)</u>	<u>13</u>	<u>9</u>
<u>Supply: Additional residential pitches (B1) – Paices Hill transit to residential</u>	<u>8</u>	<u>8</u>
<u>Supply: Additional residential pitches (B2) – Additional pitch at Four Houses Corner</u>	<u>1</u>	<u>1</u>
<u>Supply: Additional residential pitches (B3) – Additional pitch at Ermin Street, Lambourn Woodlands</u>	<u>1</u>	<u>1</u>

<u>Residual need 2021/22 to 2025/26 with additional residential pitches included in supply (C) = A-B1-B2-B3</u>	<u>3</u>	<u>-1</u>
<u>Longer-term need 2026/27 to 2037/38 (D)</u>	<u>17</u>	<u>11</u>
<u>Residual need 2021/22 to 2037/38 with additional residential pitches included in supply (E) = C+D</u>	<u>20</u>	<u>10</u>
<u>Summary</u>	<u>Cultura I need</u>	<u>Of which: PPTS NEED</u>
<u>Plan period Authorised Pitch Shortfall (2021/22 to 2037/38) (F)</u>	<u>30</u>	<u>20</u>
<u>Permanent pitches with planning permission or planned (G)</u>	<u>10</u>	<u>10</u>
<u>Residual need 2021/22 to 2037/38 after potential pitch development considered (F-G)</u>	<u>20</u>	<u>10</u>

PQ35. If the Plan does not make provision to meet in full the identified need for additional gypsy and traveller accommodation in the plan period 2022 to 2039, what is the justification?

Council response:

The Council has determined that a Gypsy and Traveller Accommodation Development Plan Document (GTA DPD) is to be prepared to seek to allocate sites to meet the longer term need, the transit pitches and/or tolerated stopping places. During the course of public consultation exercises, including a call for sites and a specific question in the Regulation 18 consultation (December 2020-February 2021) asking if any parties knew of available land for Gypsies and Travellers, no sites were promoted for Gypsy and Traveller use. Enquiries were made with the site promoter and landowners of the North East Thatcham strategic site. The site promoters could not commit to offering a site and management of a site, either for transit or permanent pitches. Enquiries were made with the owner of the New Stocks Farm site at Paices Hill to increase the provision of permanent pitches on the site, which included officers visiting the site. It was agreed that 9 pitches could be achievable, an increase on the 8 already allocated. However, due to the proximity of the site to Aldermaston Atomic Weapons Establishment, the particular vulnerabilities of living in a caravan, and as this would be an increase affecting the off-site emergency plan, this met with objection from Emergency Planning Officers. An additional pitch is planned at Four Houses Corner, as explained in the response to Question 34, and a planning application is currently pending consideration. It is unlikely that any more pitches could be accommodated on the site due to the size of the site and the number of already planned pitches.

Taking a positive approach to plan-making it was determined that rather than delay submission of the Local Plan Review a DPD would be produced, with a dedicated focused call for sites and update to the GTAA once Four Houses Corner is occupied. In the meantime there are a number of planning applications under consideration for permanent Gypsy and Traveller pitches, which may assist in meeting the residual short term need, whilst also contributing to meeting the longer term need. At the time of responding, there are six planning applications pending consideration (not including Four Houses Corner) requesting permission for 15 permanent pitches (as at September 2023).

Travelling Showpeople

Inspector:

Table 8 in the Plan identifies a need for 24 plots for travelling showpeople between 2021 and 2038. Paragraph 11.34 advises that there is currently one yard for travelling showpeople in the district and that any need that does arise can be accommodated on that yard. Policy RSA24 allocates a site at Long Copse Farm, Enborne for 24 plots.

PQ36. Does the Plan identify sufficient suitable land to allow the identified need for 24 plots for travelling showpeople to be met during the plan period?

Council response:

Yes. The site area included in the red line, is approximately 4.4ha, and rolls forward the site allocated in the Housing Site Allocations (HSA) DPD. The site was originally allocated for 20 plots, for the site area of 4.4ha, using the Showman's Guild standard of 0.22ha per plot, as was the standard used in the 2007 Travelling Showpeople Needs Study. During the course of the examination the number of plots increased to 24, to account for the longer term need. The site was not increased in area, and thus is approximately 0.19ha per plot. The agents acting for the prospective users did not comment on this change, and the HSA DPD was adopted.

Officers have seen a site plan which illustrates that 24 plots can be accommodated within the site. Each plot size would be a minimum of 100x80ft. Zippos Circus, through their agent RPS, has responded to the Regulation 19 consultation, considering that the policy will 'provide for the needs of the travelling showpeople over the Plan period. No changes are necessary'. The GTAA recommends the site at Longcopse Farm is safeguarded for Travelling Showpeople, recognising the allocation of 24 plots, and that there was no additional need for yards across the District. Thus, it is considered that the site is sufficient for the 24 plots.

Wheelchair accessible homes

Inspector:

Policy SP18 requires around 10% of new market homes to meet the wheelchair users standard M4(3). Paragraph 6.72 refers to evidence indicating a need for around 1,200 such homes. The Homebuilders Federation's representation challenges that evidence and suggests that the need is actually for around 620 homes. National planning guidance outlines the evidence required to justify such policy requirements²⁷.

PQ37. Is the requirement in policy SP18 for around 10% of new market homes to meet the wheelchair users standard M4(3) justified by adequate and proportionate evidence consistent with national policy and guidance?

Council response:

The evidence to support the requirement in Policy SP18 for around 10% of the new market housing to meet the wheelchair accessible standard M4(3) is set out in Chapter 5 of the West Berkshire Updated Housing Needs Assessment (May 2022) ([HOU5](#)).

Planning Policy Guidance (PPG) outlines that local planning authorities should take account of evidence that demonstrates a clear need for housing for people with specific housing needs and plan to meet this need (Reference ID: 56-005-20150327). It goes on to state that based on their housing needs assessment and other available datasets it will be for local planning authorities to set out how they intend to approach demonstrating the need for Requirement M4(2) (accessible and adaptable dwellings), and/or M4(3) (wheelchair user dwellings), of the Building Regulations. Local planning authorities can consider and take into account a range of official published statistics and factors, including:

- *the likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes, sheltered homes or care homes).*
- *the accessibility and adaptability of existing housing stock.*
- *how needs vary across different housing tenures.*
- *the overall impact on viability. (Reference ID: 56-007-20150327)*

The analysis set out within HOU5, under the sub-heading Wheelchair User Housing, draws on a range of secondary data sources, including the English Housing Survey (EHS) and the 2011 Census data, to estimate the number of current and future

²⁷ PPG ID: 56-007-20150327.

wheelchair users and to estimate the number of wheelchair accessible/adaptable dwellings that might be required in the future.

Table 5.11 of HOU5 identifies a need from wheelchair user households in 2021 of 1708 households, which is expected to increase to 2505 households in 2039 (an increase of 797 households). As identified in Para 5.61, of the current number of wheelchair households, some will be living in a home which is suitable for wheelchair use, others may require improvement and some will need to move to an alternative home. Based on EHS data, the modelling assumes that 25% of current wheelchair households are not living in suitable accommodation and will need to move. It thus identifies a current need for 420 households (of the total of 1708), to which the projected future need arising from the net change in wheelchair households is added.

The Policy (SP18) seeks to enhance the pool of housing which can be adapted to meet the needs of wheelchair users. The Policy requires the delivery of homes which allow adaption of the dwellings to meet the needs of occupants who are wheelchair users. It is reasonable the assessment of need for takes account of the projected need for such dwellings. Many homes within the existing stock will not be accessible for wheelchair users, and the Council does not consider that it is only appropriate to make provision for housing for 25% of the expected growth in wheelchair users. This would constrain their access to housing, and in many cases would require major work in remodelling existing stock to make it visitable. Provision of new-build housing is considered the most appropriate solution in terms of ensuring accommodation can be made fully usable and is considered to best meet the needs of wheelchair-users.

The need shown for 1216 wheelchair-user homes equates to 13% of the District's housing need, as set out in Policy SP12. This has been rounded down to a policy requirement for 10% which assumes some modest provision within the existing stock.

Affordable homes

Inspector:

Paragraph 6.78 refers to a need for 330 affordable homes per year. Policy SP19 sets out the following requirements for the provision of affordable homes in market-led development schemes:

- 20% on sites of between 5 and 9 dwellings
- 30% on brownfield sites of 10 or more dwellings
- 40% on greenfield sites of 10 or more dwellings

National planning guidance advises that an increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes²⁸.

PQ38. (a) Based on the housing supply identified in the Plan, approximately how many affordable homes are likely to be delivered on market-led development schemes in accordance with the requirements of policy SP19? (b) How does this relate to the number of affordable homes identified as being needed during the plan period? (c) What consideration was given to increasing the Plan's housing requirement in order to help deliver the number of affordable homes identified as being needed?

Council response:

PQ38a) Based on the housing supply identified, 2,142 affordable dwellings are expected to be delivered on market-led schemes.

If the proposed modifications are made to policy SP12 of the Plan (as pre response to PQ25) to include in the housing supply the extant permission at Land off Faraday Road / Kelvin Road (160 dwellings) then 2,190 affordable dwellings are expected to be delivered. The Council's response to PQ25 (a) provides further information on why this site is proposed to be included in the housing supply.

PQ38b) The Updated Housing Needs Evidence that was prepared by Icen in July 2022 ([HOU5](#)) shows a net affordable and social rented housing need equivalent to 330 dwellings per annum, or 5,610 dwellings over the Plan period to 2039.

Through the housing supply identified in the submitted LPR, there would be a deficit of 3,468 dwellings against the need. This deficit would reduce to 3,420 if the site mentioned in the response to 38(a) above is included.

²⁸ PPG ID: 2a-024-20190220.

However, as can be seen from the Council's response to PQ19 there is a need to extend the plan period by two additional years to cover the period to 2041. Extending the plan period to 2041 would result in an additional need of 660 affordable dwellings, increasing the overall affordable housing need from 5,610 to 6,270 dwellings.

PQ38c) The Updated Housing Needs Evidence ([HOU5](#)) highlights that despite the level of affordable housing need being high in the District, this does not suggest that the LPR housing requirement should be increased to above that suggested by the standard method.

The link between affordable and overall need is complex, and many of those picked up as having affordable housing need are already in housing, so do not generate a net additional need for a home.

In addition, most of the affordable need is already part of the demographic projections which are used to drive the standard method; therefore, any additional provision could be seen to be double counting.

In order to boost supply, the Council has sought to maximise provision through Policy SP19 and has chosen to show the housing requirement as a range. The lower end of the range is the LHN that has been calculated using the standard method, whilst the upper end of the range is the LHN with an additional 5%. The upper end of the range is the target figure.

Inspector: National policy states that provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set a lower threshold of 5 units or fewer). Paragraph 6.75 in the Plan seems to indicate that most, but not all, of West Berkshire is a designated rural area.

PQ39. Which parts of the District are not designated rural areas? Is the intention that the requirement for providing affordable homes on sites of between 5 and 9 dwellings would apply to those areas? If so, what is the justification?

Council response:

Under paragraph 64 of the National Planning Policy Framework (NPPF) ([NAT4](#)), the provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set at a lower threshold of 5 units or fewer).

Section 157 of the Housing Act 1985 defines designated rural areas as a National Park, an Area of Outstanding Natural Beauty (AONB), and an area designated by order of the Secretary of State as a rural area.

There are no National Parks within West Berkshire, however 74% of West Berkshire lies within the North Wessex Downs AONB. The Housing (Right to Acquire or Enfranchise) (Designated Rural Areas in the South East) Order 1997 designates large parts of the remaining areas of the district as rural areas.

Figure 1 below shows the limited areas of the District which are not designated as rural areas.

Figure 1: Areas within West Berkshire not designated as rural areas



It is intended that the policy requirements set out in Policy SP19 are applied across the whole District. For clarification, amendments to supporting text paragraphs 6.75 and 6.78 are suggested below.

The approach taken within the LPR is considered to be locally justified in light of the scale of the identified affordable housing need across West Berkshire. As set out in paragraph 6.75 of the LPR, and as can be seen above, only a small proportion of the District identifies as non-designated rural areas. These areas are around the main urban areas of Newbury, Thatcham and the Eastern Urban Area. In order to maximise opportunities for increased delivery the LPR evidence tested a range of development typologies, assessing varying proportions, thresholds and tenures in order to achieve a balance between affordable housing provision and development viability. The policy requirements set out within Policy SP19 are considered to achieve that balance as supported by the viability evidence ([VIA1a-VIA1f](#)). The Council is therefore taking a positive approach to the provision of affordable housing to meet the identified need and is seeking to maximise opportunities to boost the supply across the District.

Suggested amendments to paragraphs 6.75 and 6.78 of the LPR for clarity:

6.75 The NPPF and the Planning Practice Guidance (PPG) states that affordable housing should only be sought from major development of 10 or more dwellings or on housing sites of 0.5 ha or more across the district, other than in designated rural areas. In designated rural areas local planning authorities may instead choose to set their own lower threshold in plans and seek affordable housing contributions from developments above that threshold. Designated rural areas applies to rural areas described under [section 157\(1\) of the Housing Act 1985](#), which includes National Parks and Areas of Outstanding Natural Beauty. As ~~approximately about~~ 74% of West Berkshire is within an AONB and most of the remaining parishes are designated rural areas only a small proportion on the district is classified as non-designated rural areas. ~~it is considered justified and reasonable for the Council to secure 20% affordable housing on sites of 5 or more dwellings and this is reflected in Policy SP19.~~

6.78 The latest evidence shows a high need for affordable housing across the District with a net affordable and social rented housing need equivalent to 330 dpa (2021 base date). This is a significant need for the district and a clear justification for the Council to seek affordable dwellings through new development schemes. Whilst the level of need will be kept under review the policy therefore seeks to maximise opportunities for increased affordable housing delivery with social rented dwellings being the priority affordable housing tenure. As such, Policy SP19 is to be applied district wide.

Sustainable Homes

Inspector:

The Planning and Energy Act 2008 allows local planning authorities to set energy efficiency standards in their development plan policies that exceed the energy efficiency requirements of the building regulations. However, such policies must not be inconsistent with relevant national policies for England.

National planning policy expects development to be planned for in ways that help to reduce greenhouse gas emissions, such as through its location, orientation and design. Any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards²⁹.

Current national planning guidance (updated in 2019) states that development plan policies can set energy performance standards for new housing that are higher than the building regulations, but only up to the equivalent of Level 4 of the Code for Sustainable Homes (approximately 20% above former building regulations)³⁰. Current building regulations now require standards that are higher than Level 4 of the former Code for Sustainable Homes.

Policy DM4 requires all residential development to meet the following minimum standards of construction:

- Achieve the carbon Target Emission Rate set by the Future Homes Standard once this is confirmed by central government; in the meantime achieve 63% reduction in carbon emissions by on-site measures as compared to the baseline emission rate set by Building Regulations Part L 2021 (SAP 10.2).
- Equal to or less than 15kWh/m²/year space heat demand target, evidenced by the Building Regulations Part L SAP Fabric Energy Efficiency metric.

Policy DM4 goes on to state that all residential development should include onsite renewable, zero and low carbon energy technologies to achieve net zero carbon operational energy (regulated and unregulated) on site, or it will be required to address any residual carbon emissions by a cash in lieu contribution.

**PQ40. (a) Are the requirements relating to energy efficiency, space heat demand, net zero carbon operational energy, and carbon offsetting for all residential development consistent with national policy?
(b) If not, which parts are inconsistent and what is the justification for setting different requirements in West Berkshire?**

Council response:

Responses to PQ 40 (a) and (b) are grouped together to avoid repetition as key points apply to both parts of the question.

²⁹ NPPF 154b.

³⁰ PPG ID: 6-012-20190315.

All requirements of Policy DM4 are consistent with national policy and specifically comply with the Planning and Energy Act 2008. Although Policy DM4 requires an improvement against the baseline of the current Part L 2021 standards, it has been made clear by Government that local authorities retain the power to require energy standards that exceed those set by Building Regulations.

As early as 2018, the Government confirmed that “To clarify, the [National Planning Policy] Framework does not prevent local authorities from using their existing powers under the Planning and Energy Act 2008 or other legislation where applicable to set higher ambition. In particular, local authorities are not restricted in their ability to require energy efficiency standards above Building Regulations.” (See [NPPF Consultation Response](#), Page 48).

This was reconfirmed in the [Future Homes Standard \(report of consultation and government response; January 2021\)](#):

2.33 At present, local planning authorities may include policies in their local plans which require developers to comply with energy efficiency standards for new homes **that exceed the minimum requirements of the Building Regulations.**

2.40 ...To provide some certainty in the immediate term, the **Government will not amend the Planning and Energy Act 2008**, which means that local planning authorities will **retain powers to set local energy efficiency standards** for new homes.

Local authorities’ continued power to set higher energy standards after the introduction of the new Part L 2021 was reconfirmed in a 2022 letter from the Department of Levelling Up, Housing and Communities to Bath & North East Somerset in regard to the Council’s Local Plan Partial Update ([see paragraph 1.5](#)).

Government’s response to the Future Homes Standard also stated:

2.35 ...While some local planning authorities are unclear about what powers they have to set their own energy efficiency standards and have not done so, others have continued to **set their own energy performance standards which go beyond the Building Regulations minimum and in some cases beyond the Code for Sustainable Homes.**

This acknowledges the fact that a large number of local authorities have already had similar, and more stringent, policies to DM4 adopted following examination. Such decisions have been made following debates around the Paragraph 12 of the National Planning Practice Guidance and 2015 Written Ministerial Statement (WMS), both of which are assessed in the following paragraphs.

Current Building Regulations (Part L 2021) exceeds standards set out under the now redundant Code for Sustainable Homes (CfSH) Level 4, which was set as a limit in Paragraph 12 of the NPPG to local authorities in 2019. This guidance text is now invalid when compared to more recent Government policy statements as noted above. High Court judgement (*R (Solo Retail) v Torridge DC* [2019] EWHC 489 (Admin) [33]-[34]) confirmed that the NPPG is guidance and not policy. Therefore,

NPPG text referring to CfSH Level 4 is not part of the soundness test of consistency with national planning policy, as set out under paragraph 35 of the NPPF. By contrast, the FHS Consultation Response (in which local authorities' power to go further was confirmed) does form the Government's official policy for the uplift to Building Regulations ([Written Ministerial Statement, 15 December 2021](#)).

The NPPG text flows from a [2015 WMS](#) that referred to a CfSH Level 4 limit in context of the then-current Government policy. However, this WMS2015 was made in relation to an amendment to the [Planning and Energy Act 2008](#) (enabled by the [Deregulation Act 2015](#) Section 43) that was never enacted. The 2015 WMS specifically stated that:

*“Until the amendment is commenced, we would **expect** local planning authorities to take this statement of the Government's intention into account in applying **existing policies** and not set **conditions** with requirements above a Code level 4 equivalent.”*

One of two key elements of this text in relation to DM4 is that the limit of CfSH Level 4 standards is an expectation and not a requirement. Additionally, the WMS2015 limit only applies to conditions flowing from existing local plan policies at that time, and clearly does not refer to newly introduced local plan policies and therefore does not apply to Policy DM4.

Nonetheless, it is abundantly clear that the NPPG text and 2015 WMS has been overtaken by more recent events and government policy statements, since:

- The Government's own national technical standards under Part L 2021 exceed CfSH Level 4 requirements.*
- The June 2019 update to the Climate Change Act to include a national net zero carbon target for 2050; the NPPG text (March 2019) and WMS(2015) occurred prior to that and therefore do not reflect the necessary sectoral changes to hit the current 2050 net zero carbon legally binding goal.*

Policy DM4's requirements around energy efficiency, space heat demand, net zero carbon operational energy, and carbon offsetting have been designed to pursue the levels of performance necessary to hit national carbon targets, to the greatest extent possible while using the national technical standards used in national policy. It is consistent with Part L 2021 and Future Homes Standard in that:

- The main targets of DM4 are expressed using Part L metrics calculated with the Standard Assessment Procedure (SAP): Target Emission Rate (TER) and Fabric Energy Efficiency (FEE). This accords with the powers granted by the Planning and Energy Act to use standards that are nationally endorsed.*
- The energy calculations required by DM4 can be performed with SAP, or for more accuracy the applicant can use a calculation named 'TM54' which is also newly nationally endorsed in Part L 2021 for non-residential buildings.*
- The minimum on-site carbon-saving requirement of Policy DM4 reflects the Target Emission Rate of the Future Homes Standard (as per indicative spec in*

the FHS Consultation Response) and therefore stay consistent with national policy.

At a wider scale, the National Planning Policy Framework states that new development must be planned to achieve radical greenhouse gas emissions reductions in line with the Climate Change Act 2008, which subsequently must align to the UK's carbon budgets to 2050. This requires that plans must therefore accord with national targets of 78% carbon reduction by 2035 and net zero by 2050 (and the five-yearly carbon budgets that are periodically devised by the Committee on Climate Change [CCC] and legislated by Parliament under the aegis of the Climate Change Act 2008). Committee on Climate Change analysis of the 'Balanced Pathway to Net Zero' [found](#) that all new build homes must have very low space heat demand, and ideally be net zero carbon, from no later than 2025, in order for the buildings sector to play its necessary part in the 2035 and 2050 carbon budgets.

The net zero carbon requirements of Policy DM4 are required in order to be consistent with national policy and are therefore justified. DM4's requirements are specifically set to deliver necessary changes to achieve national climate policies, as follows:

- DM4's 15kWh/m²/year space heat demand target (using SAP TFE metric) and requirement for total net zero carbon status on site are set at the level [analysed](#) to be necessary for new builds to play their role in the UK's carbon targets. The [Local Plan Review Climate Change report](#) refers to evidence demonstrating that this is feasible from other emerging local plans' evidence base.*
- DM4's renewable energy requirement fulfils the CCC advice that all new build homes be net zero carbon, and drives forward the renewable energy necessary for the UK's carbon goals (see [Sixth Carbon Budget](#), Chapter 4: Electricity) while, by seeking for its delivery at development sites, avoids the need for consumption of more land solely for renewables and thus supports the NPPF [\[paragraph 124\]](#) efficient use of land.*
- As some development (e.g. high-rise flats) may find it more challenging to achieve DM4's on-site renewable energy standard, DM4 also allows for carbon offsetting at a price that matches the nationally determined financial value per tonne of carbon (see Local Plan Review paragraph 10.30), which in turn Government calculates as the cost of abatement of all carbon savings for the UK's carbon goals. The carbon offset calculation also allows the applicant to take into account the Government's national predictions of future grid carbon reductions that will occur over the lifetime of the development.*
- The above points in turn accord with the Planning and Energy Act stipulation that the local requirements for energy efficiency and renewable energy should be 'reasonable'.*

Need for industrial and warehouse development

Inspector:

Paragraph 7.8 refers to an identified need for a minimum of around 91,000 sqm of industrial floorspace (around 23 hectares of land) to 2039. Paragraph 7.13 refers to demand for larger B8 distribution and logistics uses particularly at motorway junctions. Paragraph 7.9 indicates that the sites allocated in the Plan for employment development (listed in policy SP21) will go some way to meeting the identified need for employment floorspace although there remains a shortfall due to a lack of suitable available sites.

PQ41. In total, how much net additional industrial and warehouse floorspace is expected to be provided on
(a) the employment allocations listed in policy SP21 and
(b) designated employment areas, other existing employment sites and any other land?
© What is the overall shortfall expected to be against the identified need for a minimum of around 91,000 sqm of floorspace?

Council response:

PQ41a) Table 3 of the Employment Background Paper ([EMP5](#)) identifies the employment sites allocated in Policy SP21 of the LPR and provides details of the expected floorspace (and land in ha) to be delivered.

Policy no. / HELAA ref.	Site name	Site areas (ha)	Developable area (ha)	Land supply (sqm)
<i>Policy ESA1 (MID5)</i>	<i>Land east of Colthrop Industrial Estate, Thatcham</i>	5.1	5.1	20,400
<i>Policy ESA3 (LAM10)</i>	<i>Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn</i>	2.2	1.3	5,200
<i>Policy ESA4 (part BEEN3 & part BEEN5 – combined site)</i>	<i>Beenham Landfill, Pips Way, Beenham</i>	3.5	3.5	14,000
<i>Policy ESA5 (BEEN10)</i>	<i>Northway Porsche, Grange Lane, Beenham</i>	2.7	1.6	6,400

Policy ESA6 (PAD4)	Land adjacent to Padworth IMF, Padworth Lane, Padworth	3.1	3.1	12,400
Total		16.6	14.6	58,400
Policy ESA2 (LAM6)	Land west of Ramsbury Road, Membury Industrial Estate, Lambourn	6.9	4.4	10,381

Overall, the allocations listed in Policy SP21 provide an additional 68,781 sqm of industrial and warehouse floorspace. However, as outlined within EMP5, the site allocated in Policy ESA2, Land west of Ramsbury Road, Membury Industrial Estate (LAM6), has planning permission which is already counted within the committed supply and therefore cannot be counted as an additional contribution to meeting the employment land requirement. Whilst the site remains an allocation, the associated supply is removed from the above figure to avoid double counting, resulting in a total supply from the identified allocations of 58,400 sqm (14.6 ha of developable land).

The above figures are correct as of September 2023, and may be subject to change once the monitoring of planning commitments 2022/2023 is completed and taken into consideration.

PQ41b) The policies within the LPR promote the redevelopment and regeneration of existing sites and premises for business uses, including the District's DEAs, to boost supply and assist in meeting the needs of the District, allowing businesses to expand, attract inward investment and respond to modern business requirements.

The Employment Land Review 2020 ([EMP3](#)) and the Addendum 2022 ([EMP4](#)) assess existing employment sites and DEA's, considering opportunities for expansion, redevelopment, intensification, and any undeveloped parcels of land where additional provision could come forward. Site assessments are set out in Appendix C of EMP4. This work found that some of the existing estates are relatively low density and provide opportunities for redevelopment/intensification of business uses. Most sites have no opportunities for expansion beyond those considered through the [Housing and Economic Land Availability Assessment \(HELAA\)](#), and therefore the opportunity for additional floorspace in these areas is largely restricted to intensification through redevelopment.

Whilst opportunities for redevelopment and regeneration exist, and over the plan period the redevelopment of stock, enabling a more efficient use of space and the provision of greater levels of floorspace, particularly in DEAs is likely, it is difficult to say or quantify such floorspace with any degree of certainty without knowing landowners/developers intentions. Therefore, no quantifiable figure for the intensification of existing stock has been applied to the supply.

With regards to the London Road Industrial Estate (LRIE), paragraph 7.10 of the LPR outlines that there is potential in the later part of the plan period for additional provision on the LRIE, now renamed Bond Riverside. As set out within the LPR, the Council own land within the London Road Industrial Estates DEA, which has scope, subject to overcoming other policy constraints, for regeneration and the intensification of employment uses to maximise the potential of the site, which at present is not optimum and does not provide an attractive environment for modern day use. The Council's Executive agreed a new approach for the site in June 2022, which focuses on job creation, attracting investment to Newbury and achieving carbon neutrality. A comprehensive strategy for the delivery of regeneration on the Council owned land within and adjacent to the DEA is underway, and whilst there is potential to deliver additional employment provision in this location, until this work is completed the scale of the provision cannot be fully determined. As such, the LPR recognises the opportunity the site provides in contributing to the supply in the later part of the plan period, however until the place-making strategy for the site is complete and more certainty can be provided on development potential the LPR does not include any additional floorspace in this location within the supply.

PQ41c) The expected shortfall is set out in Table 4 of [EMP5](#).

Table 4 depicts the employment land requirement (91,109sqm) against the identified supply, which is made up of the site allocations listed in Policy SP21 (58,400sqm), and highlights an overall shortfall of industrial and warehouse floorspace over the plan period of 32,709sqm.

	<i>Requirement (sqm)</i>	<i>Identified supply (sqm) (without ESA 2 / LAM6)</i>	<i>Shortfall (sqm)</i>
<i>Industrial and warehouse (Egiii / B2 / B8)</i>	91,109	58,400	32,709

The above figures are correct as of September 2023, and may be subject to change once the monitoring of planning commitments 2022/2023 is completed and taken into consideration.

Office development

Inspector:

NPPF 87 expects office developments to be located in town centres, then in edge of centre locations, and only if suitable sites are not available on out of centre sites. Local planning authorities should apply a sequential test to planning applications for main town centre uses that are neither in an existing centre nor in accordance with an up to date local plan³¹.

Paragraph 7.4 in the Plan refers to an identified need for a net increase in office floorspace of around 51,000 sqm to 2039. Paragraph 7.7 refers to a lack of suitable sites for office developments and little to no viability in the market. The approach in the Plan is therefore to safeguard existing office space (policies SP20 and DM32); promote offices on redevelopment sites within and on the edge of town centres (policy SP22); and support office developments on relevant allocated sites, in designated employment areas, suitably located employment sites and suitable sites within settlement boundaries (policy SP20). Policy DM32 states that new office proposals within a designated employment area will not be required to satisfy the sequential test.

PQ42. What is the “identified shortfall in supply” of office floorspace (referred to in paragraph 7.7?)

Council response:

Table 4 of [EMP5](#) sets out the employment land requirement (50,816sqm) against the identified supply (0sqm), and highlights a shortfall of office floorspace over the plan period of 50,816sqm. As no suitable and available sites for office development have been identified within the LPR, the shortfall is 100% of the requirement.

	<i>Requirement sqm)</i>	<i>Identified supply (sqm)</i>	<i>Shortfall (sqm)</i>
<i>Office (Egi / ii)</i>	<i>50,816</i>	<i>0</i>	<i>50,816</i>

The above figures are correct as of September 2023, and may be subject to change once the monitoring of planning commitments 2022/2023 is completed and taken into consideration.

³¹ NPPF 87

PQ43. Is the approach in policies SP20 and DM32 to office developments outside town centres consistent with national policy? If not, what is the justification?

Council response:

The NPPF makes clear that main town centre uses, as defined in [Annex 2 Glossary](#), which includes offices, should be located in town centres. The NPPF and PPG set out that a sequential approach to the location of such uses should be used to guide main town centre uses towards town centre locations in the first instance. Town and district centres are important employment and commercial locations, and this approach is seen as an important tool in supporting the vitality and viability of existing centres.

The LPR seeks to direct proposals for office floorspace to town and district centres and DEA's, supporting existing and new businesses through redevelopment and regeneration of premises and making more efficient use of land.

The LPR, through Policy SP22, promotes a sequential approach and directs main town centre uses (including retail, leisure, cultural and office development) to town and district centres first, followed by edge of centre and then out of centre sites. In addition, in order to provide flexibility and boost the supply of offices, Policy SP20 and DM32 do not require proposals for office floorspace within DEA's to satisfy the sequential approach and as such, office development within the Designated Employment Areas will be considered acceptable. DEA's are established locations across the District designated for business uses/development, providing a variety of sites and premises to promote sustainable economic growth. These areas host a diverse range of businesses, provide considerable job opportunities and contribute significantly to the supply of employment land across West Berkshire. The redevelopment and regeneration of land within these locations is likely to be an important source of supply in meeting the identified office need over the plan period.

Given the nature of centres within the district, the scope to deliver larger scale office developments within these centres is limited and likely to be out of keeping with the surrounding built environment. Therefore, to encourage a supply of offices within existing centres, Policy SP22 also supports redevelopment/regeneration proposals within town and district centres that provide a net additional contribution to office space.

The approach set out within the LPR is considered to be locally justified in light of the scale of the identified need for office space over the plan period and the lack of available sites. The Council is therefore taking a positive policy approach to boosting the supply of office provision by encouraging office development within town and district centres, but also within established DEA's where the majority of the district's business development exists, providing opportunities for clusters and/or networks of knowledge and data driven, creative or high technology industries. This approach seeks to enable a rapid response to changes in economic circumstances, as required by national policy (NPPF, para 82d), should the office market improve within the lifetime of the Plan.

Appendix 6: How policies are applied in a neighbourhood planning context

PQ44. (a) What is the purpose of including the information in Appendix 6 in the Plan? (b) Is it entirely consistent with relevant legislation and national policy and guidance?

Council response:

PQ44a) The purpose of such information was to provide information to Qualifying Bodies and decision takers on the weight of neighbourhood plans in the decision-making process, the implications of not being able to demonstrate a 5-year housing land supply, in addition to a brief overview of neighbourhood plans.

PQ45b) Section 19 of the Planning and Compulsory Planning Act 2004 sets out the specific matters that local planning authorities must have regard to when preparing a plan. These include amongst others, strategic priorities for the development and use of land and policies to address these priorities. Section 19 does not cover how local plan policies are applied in a neighbourhood planning context.

Regulation 10 of the Town and Country Planning (Local Planning) (England) regulation 2012 sets out what additional matters LPAs must have regard to when preparing a local plan. Chapter 3 of the National Planning Policy Framework (NPPF) has regard to plan-making, whilst Planning Practice Guidance includes a section (Paragraph: 002 Reference ID: 61-002-20190315) on what a local plan should look like. These also do not cover how local plan policies are applied in a neighbourhood planning context.

Whilst Appendix 6 was included for information purposes, it is accepted that such an appendix is inconsistent with legislation. The Council will therefore propose a modification to delete Appendix 6.

The Council's neighbourhood planning resources webpage, which is kept under review and updated as appropriate, includes information that was included in Appendix 6: <https://www.westberks.gov.uk/npresources>.

Appendix 9: Glossary

PQ45. Are all of the definitions in the Plan's Glossary consistent with those in NPPF Annex 2? Please identify any definitions that are different.

Council response:

The Council can confirm that, as a general rule, where terms in the Glossary are also defined in the NPPF, that the same definition has been used. In some instances, additional information has also been provided to highlight how the term is used in the context of West Berkshire.

In most cases the wording of definition is identical, but for consistency, there are three terms which could usefully be clarified as follows:

Development Plan - Is defined in section 38 of the Planning and Compulsory Purchase Act 2004, and includes adopted local plans, neighbourhood plans that have been made together with any regional strategy policies that remain in force. been Neighbourhood plans that have been approved at referendum are also part of the development plan, unless the local planning authority decides that the neighbourhood plan should not be made.

*Local Housing Need – ~~An unconstrained assessment of the number of homes needed in an area, and the first step in the process of deciding how many homes should be planned for. The standard method of assessing LHN is set out in the Planning Practice Guidance in a formula which takes account of household growth projections and affordability in the local area.~~
The number of homes identified as being needed through the application of the standard method set out in national planning guidance (or, in the context of preparing strategic policies only, this may be calculated using a justified alternative approach as provided for in paragraph 61 of this Framework).*

*Planning Condition - A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) ~~(as amended).~~
or a condition included in a Local Development Order or Neighbourhood Development Order.*

The Council proposes to make these amendments as minor modifications.

The Glossary also contains a number of other terms used with the LPR but which are not included in the NPPF Annex 2. Definitions for these terms have been obtained or created using information from other sources.

Strategic and local road networks

Inspector:

National policy advises that development should only be prevented if it would have an unacceptable impact on highway safety or the residual cumulative impacts on the strategic road network would be severe. Local plans should ensure that any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to any acceptable degree³².

National Highways representation³³ suggests that the transport evidence is not sufficiently developed to demonstrate that the Plan is sound with regard to impacts on the strategic road network (M4 and A34) and identification of any necessary mitigations that would have a reasonable prospect of delivery within the relevant timescales. Furthermore, a number of specific substantive issues are identified with the transport modelling undertaken. A number of steps are suggested to address the concerns raised. The Duty to Cooperate Statement indicates that the Council is working towards a statement of common ground with National Highways³⁴.

Hampshire County Council's representation³⁵ raises concerns about the impact the development proposed in the Plan, including the 1,500 homes on the Sandleford strategic site (policy SP16), could have on the A339. They suggest that any evidence provided about the provision of access to the A339 should consider wider strategic routes including the A34.

Network Rail's representation³⁶ advises that development of the North East Thatcham strategic site (policy SP17) will lead to increased use of the Thatcham level crossing where the barriers are down for 50% of the time and peak period queues form on both sides of the railway. They suggest that a viability assessment be carried out which includes a road bridge to replace the level crossing to ensure that the required infrastructure is provided to mitigate the impact of the development.

PQ46. Could the Council:

- (a) Advise if any further work relating to the impact of the Plan on the strategic and local road networks may be necessary and, if so, what that work would be and the date by which it is expected to be completed.**
- (b) Indicate a date by which a statement of common ground may be agreed with National Highways.**
- (c) Advise on any actions being taken to address the concerns raised by Hampshire County Council about the potential impacts on the A339.**
- (d) Advise on any actions being taken to address the concerns raised by Network Rail about the Thatcham level crossing.**

³² NPPF 110 and 111.

³³ Email 3 March 2023.

³⁴ CD11 March 2023.

³⁵ Letter 3 March 2023.

³⁶ Letter 28 February 2023.

Council response:

PQ46a) Work has taken place to address the concerns expressed by National Highways. Some of this information has been shared with them. In addition, SRN junction plots have been included as requested and the plotting of Local Plan traffic through these junctions have been included in an updated Forecasting Report.

PQ46b) The remaining additional work is being shared and discussed with National Highways with a view to working towards a statement of common ground. The date by which we anticipate this happening will need to be confirmed following further liaison with NH.

PQ46c) The Council has been undertaking a joint study programme focused on the A339 between Basingstoke and Newbury. As part of this study the proposed significant developments close to Basingstoke and Newbury towns have been taken into account. This includes the allocated 1,500 homes at Sandleford, Newbury and the 3,520 homes at Manydown, Basingstoke. The work on this phased study of the A339 has been undertaken jointly with Hampshire County Council.

In addition, as with all strategic sites, the access arrangements for the Sandleford housing development have sought to ensure that there is not only good access to the local routes that future residents will seek to use by all modes (walking, cycling, public transport and private car) but that the access to the Strategic Road Network (in this case the A34 linking with the M4 and M3 further afield) is also easy and quick enabling more strategic journeys to be taken without adding undue pressure to local roads.

PQ46d) WBC has reached out to Network Rail to seek an opportunity to discuss feasibility work that has taken place in relation to options for Thatcham Level Crossing. The modelling has been used to draw out specific outputs for this area around the level crossing with a view to these informing further discussion with Network Rail. Discussions will seek to reach an agreed position between NR and WBC as soon as possible.

Denison Barracks and RAF Welford

Inspector:

National policy expects planning policies to recognise and support development required for operational defence and security purposes and ensure that operational sites are not affected adversely by the impact of other development proposed in the area³⁷.

The Defence Infrastructure Organisation representation³⁸ advises that in addition to AWE Aldermaston and AWE Burghfield, which are subject to specific policies in the Plan, there are operational sites at Denison Barracks and RAF Welford. They suggest that to be effective and consistent with national policy, an additional policy should be included in the Plan relating to development within those operational sites and to non-defence related development nearby.

PQ47. Does the submitted Plan contain unambiguous policies so it is evident how a decision maker should react to development proposals within and in the vicinity of the operational sites at Denison Barracks and RAF Welford? If not, would the modification proposed by the Defence Infrastructure Organisation ensure that the Plan is sound?

Council response:

The policies within the Plan should be read as a whole, and the Council consider it is clear to a decision maker how development within and within the vicinity of the operational sites at Denison Barracks and RAF Welford should be considered. Both Denison Barracks and RAF Welford are previously developed sites within the AONB, therefore specific policies relating to such development proposals would include SP1 Spatial Strategy, SP2 North Wessex Downs AONB, DM1 Development in the Countryside and DM35 Sustaining a Prosperous Rural Economy. It may be that if there are specific development plans or opportunities on either site, that this is best dealt with through the preparation of a development brief or similar. The Council does not consider that there is a need for an additional policy as proposed by the Defence Infrastructure Organisation.

³⁷ NPPF 97.

³⁸ Letter 3 March 2023

Environment Agency and Thames Water

Inspector:

The Environment Agency's representations³⁹ suggest that modifications to various policies in the Plan, including SP1, SP5, SP7, SP11, DM5, DM6, DM20, DM24, DM25, DM28, DM29 and DM37 as well as some site allocation policies, are required to ensure that they are sound. They also suggest that the Plan should include an additional policy specifically relating to watercourses.

Thames Water's representations⁴⁰ suggest that modifications to policies SP6 and DM7 and site allocation policies are required to ensure that they are sound.

PQ48. For each policy that Environment Agency and Thames Water refer to, does the Council agree that modifications are essential to ensure soundness or legal compliance? If not, please indicate how the issue raised can be satisfactorily addressed by other policies in the Plan, national planning policy, and/or other means such as national guidance or legislation.

Council response:

The Council considers some amendments to the LPR could usefully be made in response to comments from the Environment Agency and Thames Water, and it will continue to work with each respective agency to progress the modifications required. Once agreed, the Council will submit the complete response together with any agreed modifications.

³⁹ Representation forms dated 2 and 3 March 2023

⁴⁰ Letter and representation forms dated 28 February 2023

Historic England

Inspector:

Historic England's representation⁴¹ suggests that modifications are required to policy SP9 and associated reasoned justification and policies SP17 and RSA22. They also suggest that allocations RSA2 and RSA17 are not sound as they are not based on proportionate evidence relating to the historic environment.

PQ49. (a) Does the Council agree with Historic England that modifications to policies SP9, SP17 and RSA22 are essential to ensure soundness? If not, please indicate how the issues raised can be satisfactorily addressed by other policies in the Plan, national planning policy, and/or other means such as national guidance or legislation.

(b) Does the Council agree that a more detailed heritage impact assessment is required to justify allocations RSA2 and RSA17? If not, why not (and are any modifications required to the wording of those policies to ensure that they are effective with regard to heritage assets)?

Council response:

PQ49a) Council officers had a positive and constructive meeting with Historic England on 1st August 2023 to discuss its comments and to begin work on a Statement of Common Ground (SoCG) which will deal with all of the issues raised. This is still in draft form and will be submitted as part of the examination once finalised and agreed.

As far as policies SP9, SP17 and RSA22 are concerned, taking each in turn:

Policy SP9 Historic Environment

The Council agrees that references to 'enabling development' should be removed, appreciating that its inclusion would make such development policy compliant and therefore in conflict with the NPPF.

It is also agreed that in recognition of the role Conservation Area Appraisals (CAAs) play in the Council's strategic approach to the historic environment, it would be helpful to move references to CAAs and Management Plans from Policy DM9 to Policy SP9.

Policy SP17 North East Thatcham.

The Council agrees that the policy would be strengthened with the inclusion of the suggested wording from Historic England, as follows:

⁴¹ Letter 3 March 2023

- *'A Historic Environment Strategy to demonstrate how the site's historical development, archaeological remains and historic buildings and parkland will inform the scheme and help to create a sense of place. It should:*
 - i. be informed by proportionate heritage impact assessment, desk-based archaeological assessment and, if needed, field evaluation; and*
 - ii. articulate how the proposed scheme would support an appropriate future use of the Listed Buildings in the area and minimise harm to their significance (including demonstrating listed buildings in the area will be conserved and how the impact of the development on their settings has been considered).*

Policy RSA22 Land adjacent Station Road, Hermitage

The Council agrees that the policy would be strengthened with the inclusion of the suggested wording from Historic England as follows:

k) 'A Heritage Impact Assessment will be required due to the presence of non-designated heritage assets and the nearby Scheduled Monument (Grimsbury Castle)

The development will be informed by a desk-based archaeological assessment followed by field evaluation if necessary.'

PQ49b) Policy RSA2 Land at Bath Road, Speen.

The allocation is proposed to be carried forward from the Housing Site Allocations Development Plan Document (HSA DPD). The Inspector for the HSA DPD was satisfied that the allocation of the site was justified with modifications. One of the modifications was to amend the text to refer to the need to fully consider the heritage setting of the site and to afford protection to the Speen Conservation Area. Thus, criteria b), d), and j) included reference to the historic environment, as expressed in proposed policy RSA2.

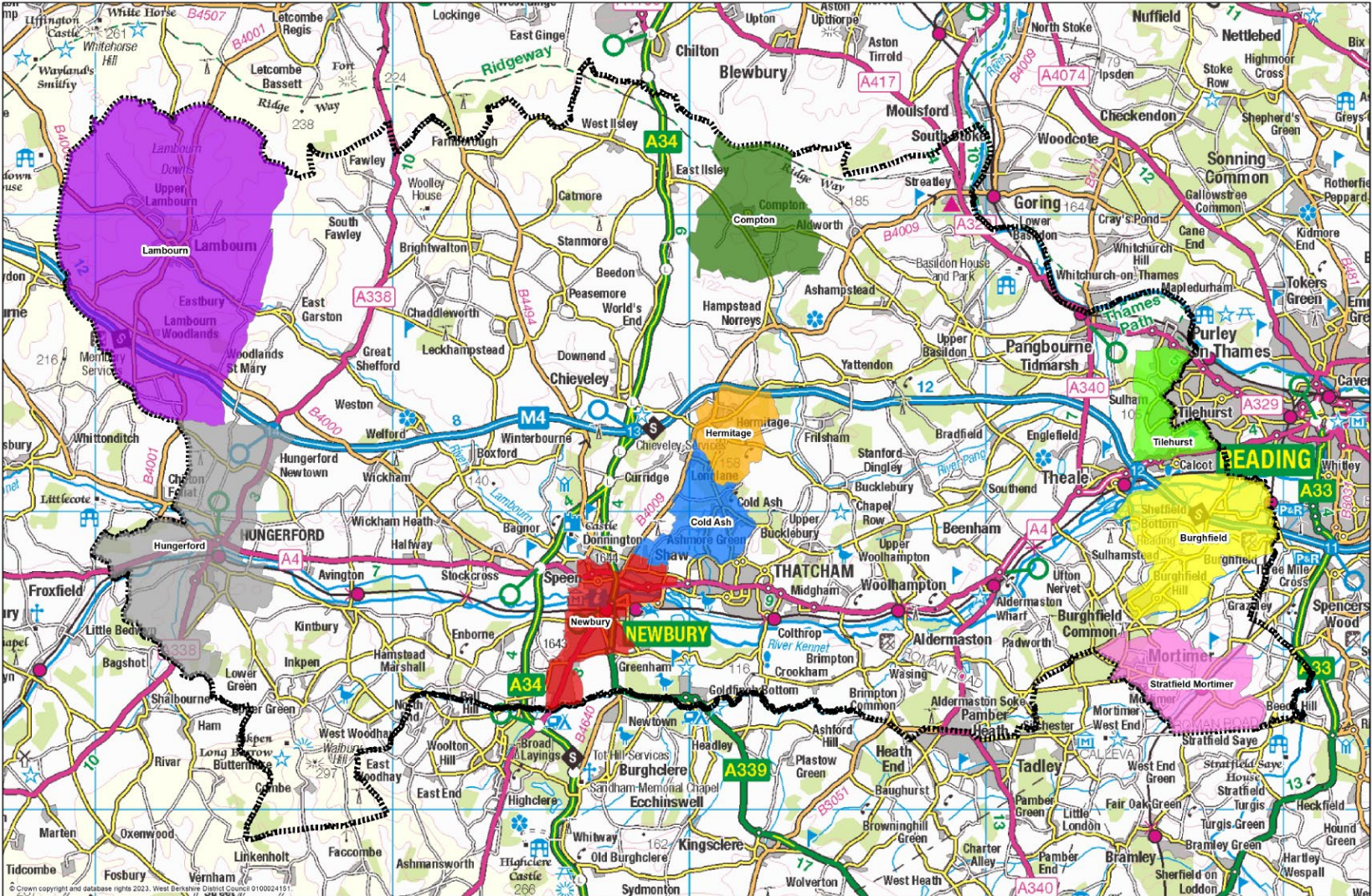
At the meeting with Historic England it was agreed that the policy could be amended to better highlight the particular sensitivities of the Speen Conservation Area to ensure development on the site enhances or better reveals its significance. It is both parties' intention to agree proposed amendments to the policy as part of the Statement of Common Ground.

The site already benefits from outline planning permission, with Reserved Matters currently being considered by the Council.

Policy RSA17 Land at Chieveley Glebe, Chieveley.

At the meeting with Historic England it was agreed that the Council would consider clarifying and undertaking further work as necessary to inform the policy. It is both parties' intention to agree proposed amendments to the policy as part of the Statement of Common Ground.

PQ14 b Designated Neighbourhood Areas



Annex 2

PQ16 How the housing requirement was identified for each designated Neighbourhood Area

Designated Neighbourhood Area	Housing requirement in Reg 18 emerging draft LPR	Housing requirement in Reg 19 Proposed Submission LPR	Justification
Burghfield	0	0	<p>Burghfield Parish falls within the 2019 Detailed Emergency Planning Zone (DEPZ) for the Atomic Weapons Establishment (AWE) at Burghfield. Any new development within the DEPZ that leads to an increase in the residential population could impact upon the off-site emergency plan. Including a housing requirement for the Neighbourhood Area would therefore be unsuitable.</p>
Compton	0	0	<p>Compton is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential.</p> <p>There is an allocation within the Housing Site Allocations Development Plan Document (HSA DPD) for 140 dwellings on the site of the former Pirbright site, and the Core Strategy Inspector's report identified that the site could provide a higher level of growth than is normally expected in a service village. Development at the former Pirbright site is still outstanding, however outline planning permission for 160 dwellings has been granted permission. The allocation at the Pirbright site has been retained within the Local Plan Review (LPR).</p> <p>Whilst the HELAA identifies two sites that have potential, it was considered that due to the scale of development that is to take place at the Pirbright site, there should be no further allocations within Compton in the LPR period. This is particularly so because Compton is located within the North Wessex Downs Area of Outstanding Natural Beauty (AONB), a nationally important and legally protected landscape. The National Planning Policy Framework (NPPF) is clear that great weight should be given to conserving landscape and scenic beauty in AONBs. In addition, although close to the A34 and M4, local roads are rural in nature and not suitable for heavy traffic.</p> <p>It is recognised that windfall development may come forward over the plan period.</p>

Designated Neighbourhood Area	Housing requirement in Reg 18 emerging draft LPR	Housing requirement in Reg 19 Proposed Submission LPR	Justification
Cold Ash	40	0	<p>The Parish of Cold Ash contains the village of Cold Ash, the hamlet of Ashmore Green, and small parts of the towns of Newbury and Thatcham. Cold Ash village is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Ashmore Green is not included within the settlement hierarchy and is instead a 'smaller village with a settlement boundaries' therefore only suitable for limited infill development subject to the character and form of the settlement. Newbury and Thatcham are both identified as 'Urban Areas' because of the wide range of services they offer and subsequently both will be the focus for the majority of development.</p> <p>Cold Ash sits on the southern edge of the North Wessex Downs AONB. Much of the village is just outside of the boundary, however the houses to the north and east of The Ridge are within the boundary. The AONB is a nationally important and legally protected landscape and the NPPF is clear that great weight should be given to conserving landscape and scenic beauty in AONBs. Within the HSA DPD there are three allocated sites in Cold Ash Parish for a total of between 90-100 dwellings (Land at Coley Farm, Land at Poplar Farm, and St. Gabriel's Farm). The development at St. Gabriel's Farm is now complete, whilst development at Coley Farm is yet to commence. The allocation Land at Poplar Farm will not be retained as an allocation in the LPR due to viability issues.</p> <p>The February 2020 HELAA identified five sites as having potential. Taking the development potential of these sites into consideration alongside the placing of the towns/villages in Cold Ash parish within the settlement hierarchy, existing allocations, as well as the AONB, it was considered that a housing requirement of 40 dwellings would be appropriate.</p> <p>In respect of HELAA site CA15, the eastern site parcel falls within Cold Ash Parish and the western parcel within Shaw-Cum-Donnington Parish. The Council's Highways Team have identified that for this site as well as site SCD4, the provision of a through route from the B4000 to the A339 is required. This site along with SCD4 will only be supported by Highways if this</p>

Designated Neighbourhood Area	Housing requirement in Reg 18 emerging draft LPR	Housing requirement in Reg 19 Proposed Submission LPR	Justification
			<p>is provided. Combined sites CA15 and SCD4 are of a strategic scale. It is for the local planning authority to plan for strategic sites.</p> <p>The information published in the HELAA was at a point in time. As work progressed on the LPR and more evidence was gathered, some of the development opportunities have changed. In the case of Cold Ash, the steering group found through site selection work that they were unable to allocate the housing requirement they had been given, and were looking to allocate within the settlement boundary instead.</p> <p>The principle of development within settlement boundaries is established within the development plan. As the principle of development is already established, the approach for the Local Plan has been to not allocate sites within the settlement. Advice to the steering group was that to ensure a consistent approach and conformity with the Local Plan, sites within the settlement boundary should not be allocated. Within the Reg 19 proposed submission version of the LPR the housing requirement for Cold Ash was therefore amended to zero.</p>
Hermitage	20	0	<p>The Parish of Hermitage contains the village of Hermitage which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Hermitage sits within the North Wessex Downs AONB, a nationally important and legally protected landscape which national planning policy is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>There are two sites allocated for 25 dwellings in the HSA DPD. Development has not yet commenced on these sites and it is proposed to roll forward these allocations into the LPR. A significant amount of development has taken place in Hermitage in recent years with the development of the former Cementation works.</p> <p>The February 2020 HELAA identifies 2 sites as having potential, although there are concerns about the landscape capacity of site HER4. Taking the development potential of these sites into consideration alongside recent</p>

Designated Neighbourhood Area	Housing requirement in Reg 18 emerging draft LPR	Housing requirement in Reg 19 Proposed Submission LPR	Justification
			<p>development, the placing of Hermitage within the settlement hierarchy, existing allocations as well as the AONB, officers consider that a housing requirement of 20 dwellings would be appropriate. However the NDP steering group could commission a landscape capacity assessment (or WBC can appoint a consultant and recharge the Parish Council for this work) to determine if there may be potential for a slighter higher number. In 2022, the steering group advised WBC that they no longer wished to include allocations with the Neighbourhood Plan (NP). The housing requirement was therefore amended to zero in the Reg 19 proposed submission version of the LPR.</p> <p>As part of work on the Reg 19 proposed submission LPR, site selection work was undertaken which identified a site suitable for allocation.</p>
Hungerford	55	55	<p>The Parish of Hungerford contains the town of Hungerford and the small settlement of Eddington. Hungerford is identified as a Rural Service Centre in the settlement hierarchy. Rural Service Centres have a range of services and reasonable public transport provision meaning there are opportunities to strengthen the role in meeting the requirements of surrounding communities. Eddington is not included within the settlement hierarchy and is instead a 'smaller village with a settlement boundaries' therefore only suitable for limited infill development subject to the character and form of the settlement. Hungerford sits within the North Wessex Downs AONB, a nationally important and legally protected landscape which national planning policy is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>There is one site allocated for 100 dwellings in the HSA DPD. Development has not yet commenced on the site, although it has planning permission, and it is proposed to roll forward this allocation into the LPR.</p> <p>The February 2020 HELAA identifies eight sites as having potential. Taking the development potential of these sites into consideration alongside the placing of Hungerford within the settlement hierarchy as well its location in the</p>

Designated Neighbourhood Area	Housing requirement in Reg 18 emerging draft LPR	Housing requirement in Reg 19 Proposed Submission LPR	Justification
			AONB, officers consider that a housing requirement of 55 dwellings would be appropriate.
Lambourn	25	25	<p>The Parish of Lambourn contains the village of Lambourn and the hamlet of Eastbury. Lambourn is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential. Eastbury is not included within the settlement hierarchy and is instead a 'smaller village with a settlement boundaries' therefore only suitable for limited infill development subject to the character and form of the settlement.</p> <p>Lambourn sits within the North Wessex Downs AONB, a nationally important and legally protected landscape which national planning policy is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>There are two allocated sites within the HSA DPD for 65 dwellings, and these allocations have been retained within the LPR.</p> <p>The February 2020 HELAA identified two sites as having potential. Taking the development potential of these sites into consideration alongside the placing of Lambourn within the settlement hierarchy as well as the AONB, officers consider that a housing requirement of 25 dwellings would be appropriate.</p>
Newbury	The Neighbourhood Area had not been designated at this stage	0	The steering group have not made any request for a housing requirement figure.
Stratfield Mortimer	0	0	<p>The adopted NDP includes an allocation for up to 110 dwellings. The allocated site has outline planning permission, and Reserved Matters permission for the first phase of development (28 dwellings) which is currently being built out.</p> <p>The Parish of Stratfield Mortimer contains the village of Mortimer which is identified as a Service Village within the settlement hierarchy meaning that it has a limited range of services and has some limited development potential.</p> <p>Given the outstanding dwellings still to deliver, officers consider that there</p>

Designated Neighbourhood Area	Housing requirement in Reg 18 emerging draft LPR	Housing requirement in Reg 19 Proposed Submission LPR	Justification
			should be not any additional allocations in the plan period. It is however recognised that windfall development may come forward over the plan period.
Tilehurst	175	0	<p>Tilehurst is a suburb of Reading and forms part of the Eastern Urban Area alongside Calcot and Purley on Thames. Within the settlement hierarchy it is identified as an 'Urban Area' because of the wide range of services offered and subsequently will be the focus for the majority of development.</p> <p>The western part of Tilehurst sits within the North Wessex Downs AONB, a nationally important and legally protected landscape which national planning policy is clear that great weight should be given to conserving landscape and scenic beauty in AONBs.</p> <p>There are three allocated sites within the HSA DPD for 110 dwellings (Land East of Sulham Hill (HSA8), Stonehams Farm (HSA9), and Stonehams Farm (HSA10)). The Sulham Hill development (35 dwellings) has been built out whilst the development of Stonehams Farm (HSA10) is at an advanced stage of construction. The allocation at Stonehams Farm (HSA9) is being retained in the LPR.</p> <p>The February 2020 HELAA identifies four sites as having potential. Taking the development potential of these sites into consideration alongside the placing of Tilehurst within the settlement hierarchy as part of its location within the AONB, it was considered that a housing requirement of 175 dwellings would be appropriate.</p> <p>The steering group advised the Council in 2021 (after the consultation on the Reg 18 emerging draft LPR) that they did not wish to include allocations within the NP.</p>

PQ17 Key Diagram

