

West Berkshire Local Plan Review 2022 – 2039 (LPR) Examination

West Berkshire Council response to AP77

Housing land supply identified in the Plan

AP77. Council to propose modifications to the Plan to identify additional deliverable sites and/or developable sites and/or broad locations. The response should suggest specific sites, and/or broad locations along with relevant policy wording.

Council response

The Council considers that the Plan could be modified to boost the housing land supply in the following ways:

a) Identification of additional deliverable sites

Within the Council's response to AP14 (contained within [EXAM26](#)), five sites not included within the submitted Plan were identified as being suitable and available for residential development following a reassessment of the information available to the Examination.

The Council proposes the allocation of four of these sites:

Site Ref	Site Name	Approx no. of dwellings
CA12	Land at Henwick Park, Bowling Green Road, Thatcham	225
CA17	Regency Park Hotel, Bowling Green Road, Thatcham	45
PAN8	Land north of Pangbourne Hill, Pangbourne	25
TIL13	Land at Pincents Lane, Tilehurst	138
TOTAL		433

Whilst The Creek, Heath Lane, Thatcham (ref CA16) had also been identified as being suitable for development the Council is unable to confirm the availability of the site and therefore it cannot be included.

The proposed individual site allocation policies are set out in Annex A.

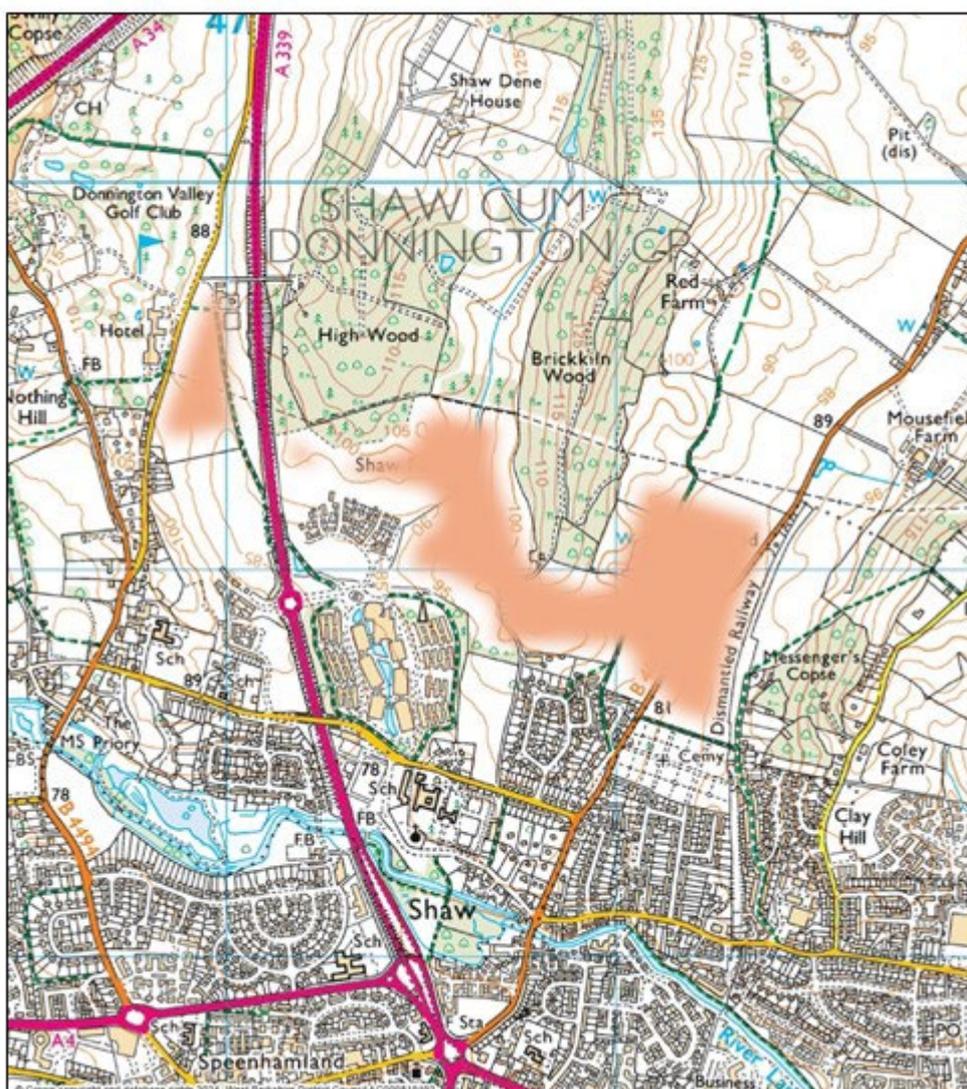
b) Identification of a broad location for growth

The Council also proposes the identification of a broad area of growth to the north of Newbury.

The West Berkshire Strategic Vision 2050 ([SET3a](#)) recognises that due to the highly constrained nature of the District, options for growth are limited. It recognises Newbury and Thatcham as settlements which should be strategically planned for in

the longer-term and identifies areas of search for future growth to the north of both towns as they are identified as having the least constraints and influences. These locations benefit from their close proximity to the main existing main urban areas with a wide range of services and facilities.

In accordance with the Vision, the area to the north of Newbury has been identified as a broad location for growth where additional allocations will be identified towards the end of the plan period to meet longer term strategic needs for housing and ensure the co-ordinated delivery of major infrastructure.



There are two large sites which are being promoted in this broad location:

- Land at Long Lane, north of Highwood Close and Shaw Cemetery (site ref: CA15); and
- Land north of Newbury (site ref: SCD4).

There is insufficient evidence at this stage to enable recommending allocating either of the above sites, either whole or in part. Further work will be needed to define where and what scale, type, mix and form of development these could deliver, enabling a lengthy lead in to identify and plan for the co-ordination of the necessary supporting infrastructure and extensive community engagement to shape their form. The Council is committed to an early review of the Plan, and therefore as part of this process will include master planning for strategic growth in this area. This broad location could potentially deliver between approximately 650 – 800 dwellings.

As the delivery of additional sites within this broad location is not needed to (and neither could it) support the Council's Five Year Housing Land Supply, should the evidence show that sites cannot be delivered, the matter can be also be addressed through the next Plan review.

The Council therefore proposes the following Main Modifications to the Submitted Plan:

Ref	Page of submitted LPR	Policy/ Paragraph of submitted LPR	Proposed Main Modification	Reason for modification
	17	Policy SP1	<p><i>Amend policy SP1 as follows:</i></p> <p><i>Newbury and Thatcham</i></p> <p>.....</p> <p>'Newbury will be a focus for housing development. An urban extension on greenfield land to the south of Newbury, at Sandleford Park will provide a new residential neighbourhood with supporting facilities and green infrastructure in accordance with Policy SP16. Smaller scale developments will include redevelopment of previously developed land. <u>A broad location for growth has been identified to the north of Newbury where additional appropriate urban extensions are anticipated to be allocated through the Local Plan towards the end of the Plan period in order to meet longer-term strategic needs for housing and to ensure the co-ordinated delivery of the necessary supporting infrastructure.....'</u></p>	In response to the Inspector's Action Point (AP77) contained within IN30 .
		Supporting text of policy SP12 and Policies Map	<p><i>Add new paragraph after 'New sites allocated in the LPR' paragraph as follows:</i></p> <p><u>'Identification of the area to the north of Newbury as a broad location for growth:</u></p> <p><u>In accordance with the West Berkshire Strategic Vision 2050, the area to the north of</u></p>	

			<p><u>Newbury has been identified on the Policies Map as a broad location for growth, where additional appropriate urban extensions are anticipated to be allocated towards the end of the Plan period to meet longer-term strategic needs for housing and ensure the co-ordinated delivery of major infrastructure. There are two large sites being promoted for development in this area but there is insufficient evidence at this stage to enable recommending that either of these should be allocated, either whole or in part. Further work will be needed to define where and what scale, type, mix and form of development these could deliver, enabling a lengthy lead in to identify and plan for the co-ordination of the necessary supporting infrastructure and extensive community engagement to shape their form. This broad location could potentially deliver between approximately 650 – 800 dwellings at the end of the plan period and beyond. The Council is committed to an early review of the Plan, and therefore as part of this process will include master planning for strategic growth in this area.'</u></p> <p><i>Add broad location to the Policies Map</i></p>	
Chapter 8	New RSA policies	<p><i>Amend Chapter 8 to include the following residential allocations with consequential changes to other parts of the Plan and Policies Map:</i></p> <ul style="list-style-type: none"> • Land at Henwick Park, Bowling Green Road, Thatcham (Site ref CA12) for approximately 225 dwellings • Land East of Regency Park Hotel, Bowling Green Road, Thatcham (Site ref CA17) for approximately 45 dwellings • Land north of Pangbourne Hill, Pangbourne (Site ref PAN8) for approximately 25 dwellings • Land at Pincents Lane, Tilehurst (Site Ref: TIL13) for approximately 138 dwellings 	In response to the Inspector's Action Point (AP77) contained within IN30 .	

A separate SA/SEA note has been prepared to accompany the Council's response to AP77. This includes a summary of the SA/SEA carried out at this stage and also full site assessment forms and SA/SEA tables for the additional sites, broad location and site allocation policies.

Housing Land Supply

The Council acknowledges that the Inspector has not yet reached a conclusion on the overall housing land supply nor if the Plan needs to identify a five year supply following the intended date of adoption. Nonetheless, the Council has provided the following information to assist the Inspector.

- ***Sandleford Park strategic allocation***

The Inspector's post hearing letter ([IN30](#)) identifies a reduced capacity at Sandleford Park. However, the Council remains of the view that this strategic site can deliver approximately 1,500 dwellings as set out within its response to AP27 ([EXAM38](#)).

Sandleford Park East

It is acknowledged that Bloor Homes is seeking to reduce the development capacity to 800 dwellings. Bloor Homes' justification for the reduction is based on its updated technical and design work, but to date, the Council has not seen any evidence that would support this statement. As a strategic site and in the interests of optimising the most efficient use of the land the Council considers that the development capacity of this site should remain as 1,000 dwellings.

Sandleford Park West

A resolution at Committee was made on 24 May 2024 to permit up to 360 dwellings (planning reference no. 23/01585/OUTMAJ) subject to the completion of a Section 106 Agreement. However, the Council considers that the base date of the housing land supply position should be consistent throughout the Examination and therefore it should refer to the latest available comprehensive housing land supply information relating to 1 April 2023.

At 1 April 2023 there was an application pending determination for up to 500 dwellings at Sandleford Park West. Accounted for within the figure of 500 dwellings is approximately 120 dwellings on an area of land that falls within the allocation boundary, but which is located west of the site where a resolution to permit has been made.

- ***North East Thatcham strategic allocation***

Within the Council's response to AP24 ([EXAM42](#) Annex E Table 1 and Table 2) the Council's proposed modifications to the anticipated delivery of the site took into account preparation of a masterplan that would be prepared and adopted as a Supplementary Planning Document (SPD) prior to the submission of any planning application. In preparing its response to AP76, the Council has reviewed the timetable for the preparation of the SPD. It is now anticipated that approximately 1,900 dwellings will be completed at North East Thatcham within the plan period.

- **Windfall allowance**

The Council has taken a cautious approach to the windfall allowance within the housing supply. The allowance is based on past windfall completions on small sites (less than 10 dwellings). No account has been made of past completions on medium and large sites windfall sites, despite past trend data which is set out within the Housing Background Paper ([HOU6](#)).

Analysis of past completions shows that over the current plan period (2006-2023), there has been an average of 380 windfall completions each year on small, medium and large sites. This equates to 72% of the total windfall housing completions.

The windfall allowance within the submitted Plan is therefore modest in comparison to the level of windfall development that has delivered between 2006 and 2023. The Plan supports development of sites within settlement boundaries and there is no indication that such sites are becoming exhausted.

Large and medium sites that come forward will contribute to the windfall element of the supply and provide further flexibility to the housing supply.

- **Total housing supply over the Plan period**

Table 2 below illustrates the total housing supply between 1 April 2023 and 31 March 2041. It has taken into account the responses to previous Action Points as well as responses to the Action Points set out within the Inspector's post-hearing letter ([IN30](#)).

The Council's response to AP78 provides an update to the housing trajectory which sets out the anticipated rate of development for specific sites.

Table 2: Total housing supply from 1 April 2023 to 31 March 2041

A. Total housing requirement	9,270
B. Total housing supply	10,143
C. Total housing supply against requirement (B - A)	873
D. % of flexibility buffer (C/A)	9.4%

- **Five year housing land supply from adoption**

The submitted Plan is being examined within the context of the NPPF September 2023. This requires the Plan to identify a supply of specific, deliverable sites for years one to five of the plan period with an appropriate buffer. The NPPF December 2023 requires Plans to identify a supply of specific, deliverable sites for five years following the intended date of adoption. In response to SQ7.11 ([EXAM33](#)), the Council confirmed that a 5.7 years' supply of deliverable housing sites with a 5% buffer could be demonstrated following the intended date of adoption of the Plan.

On 30 July 2024 the government published a draft revised NPPF for consultation. This proposes to reinstate the requirement for local planning authorities to continually demonstrate 5 years of specific, deliverable sites for decision making purposes, regardless of plan status. It also reinstates the 5% buffer. The Council notes that the requirement to identify a supply of specific, deliverable sites for five years following the intended date of adoption remains unchanged for plan making purposes.

In the context of the above, Table 3 below illustrates what the five year housing land supply will be following the intended date of adoption. Table 3 takes into account the responses to previous Action Points as well as the responses to the Action Points set out within the Inspector's post-hearing letter ([IN30](#)).

Table 3: Five Year Housing Land Supply Calculation from 1 April 2026 to 31 March 2031

A. Requirement including a 5% buffer (A)	2,704
B. Total deliverable housing land supply (B)	3,195
C. Total deliverable housing supply in years (B / A * 5)	5.9 years

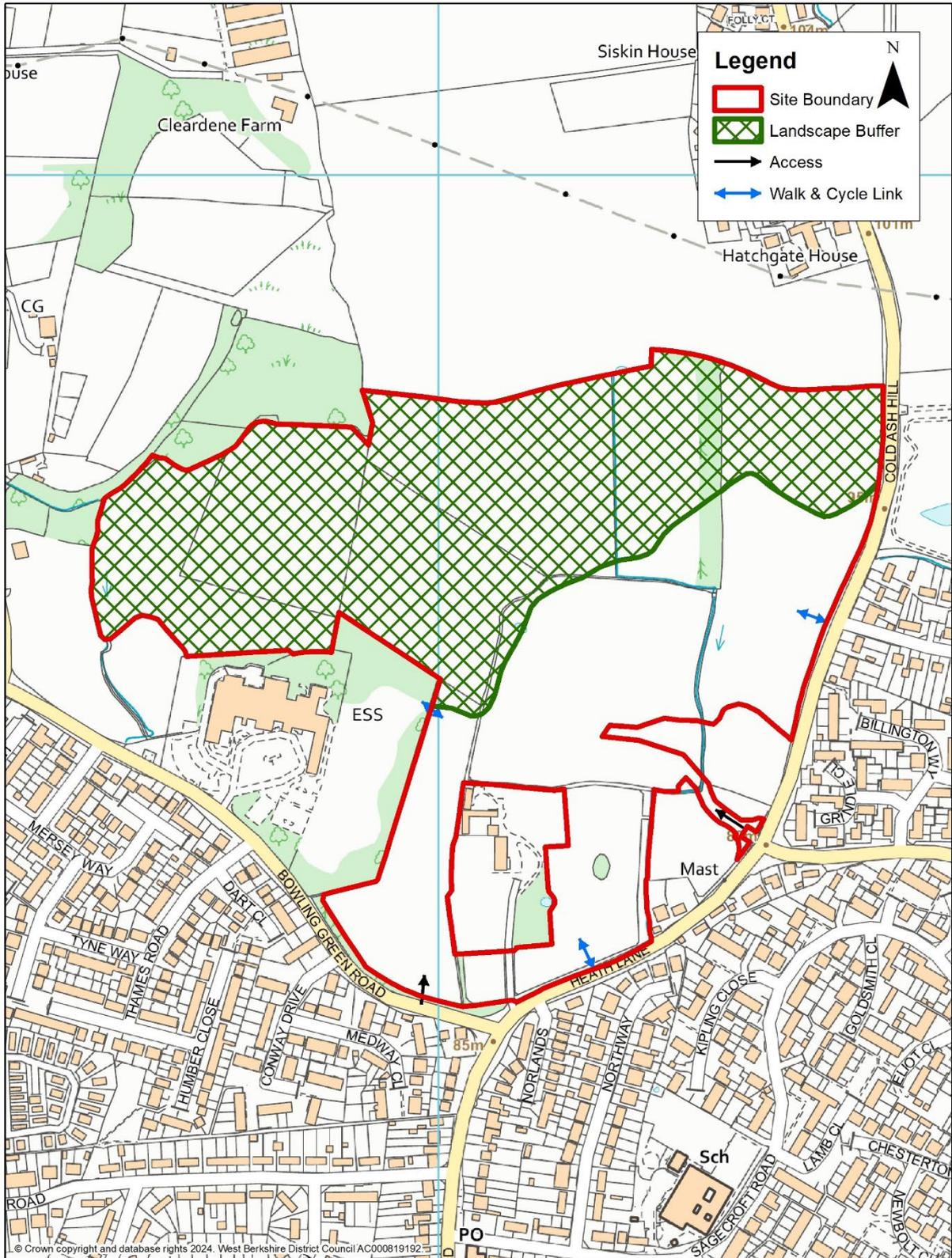
ANNEX A

Land at Henwick Park, Bowling Green Road, Thatcham**Policy RSAX****Land at Henwick Park, Bowling Green Road, Thatcham (Site ref CA12)**

The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:

- a. The provision of approximately 225 dwellings;
- b. Access to the site will be provided via Cold Ash Hill / Heath Lane and Bowling Green Road, with further pedestrian accesses onto Cold Ash Hill, Heath Lane, Bowling Green Road, and the allocation RSAX (Land east of the Regency Park Hotel);
- c. Main internal walking and cycling routes for the site will be provided, and will be linked to existing routes;
- d. Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment, using the Council's VISSIM model, will be required;
- e. The widening of Heath Lane and Bowling Green Road fronting the site will be required;
- f. Measures will be included to improve accessibility by, and encourage the use of, non-car transport modes. These measures will be set out in a Travel Plan;
- g. Comprise a development design and layout in line with Policy SP7 and that will be further informed by a full detailed Landscape Visual Impact Assessment (LVIA), and will include the following measures:
 - i. no development above the 95-metre AOD contour;
 - ii. the balance of land to the north and west of the developed area to be retained as an open landscape buffer in order to maintain the open character between Thatcham and Cold Ash and which will be retained outside the settlement boundary for Thatcham; and
 - iii. Green Infrastructure and public open space within the developed parts of the site, taking into account the requirements set out in DM40;
- h. Small areas of the site are at risk of surface water flooding. Development must be avoided within these areas;
- i. Development proposals for the site will be supported by a Flood Risk Assessment, in accordance with policy SP6, which will take into account the Thatcham Surface Water Management Plan;
- j. Sequential approach to the location of development;
- k. Development will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected; and
- l. The site lies within a Mineral Safeguarding Area and so consideration of Policy 9 of the West Berkshire Minerals and Waste Local Plan will be required.

Land at Henwick Park, Bowling Green Road, Thatcham



Land East of the Regency Park Hotel, Bowling Green Road, Thatcham

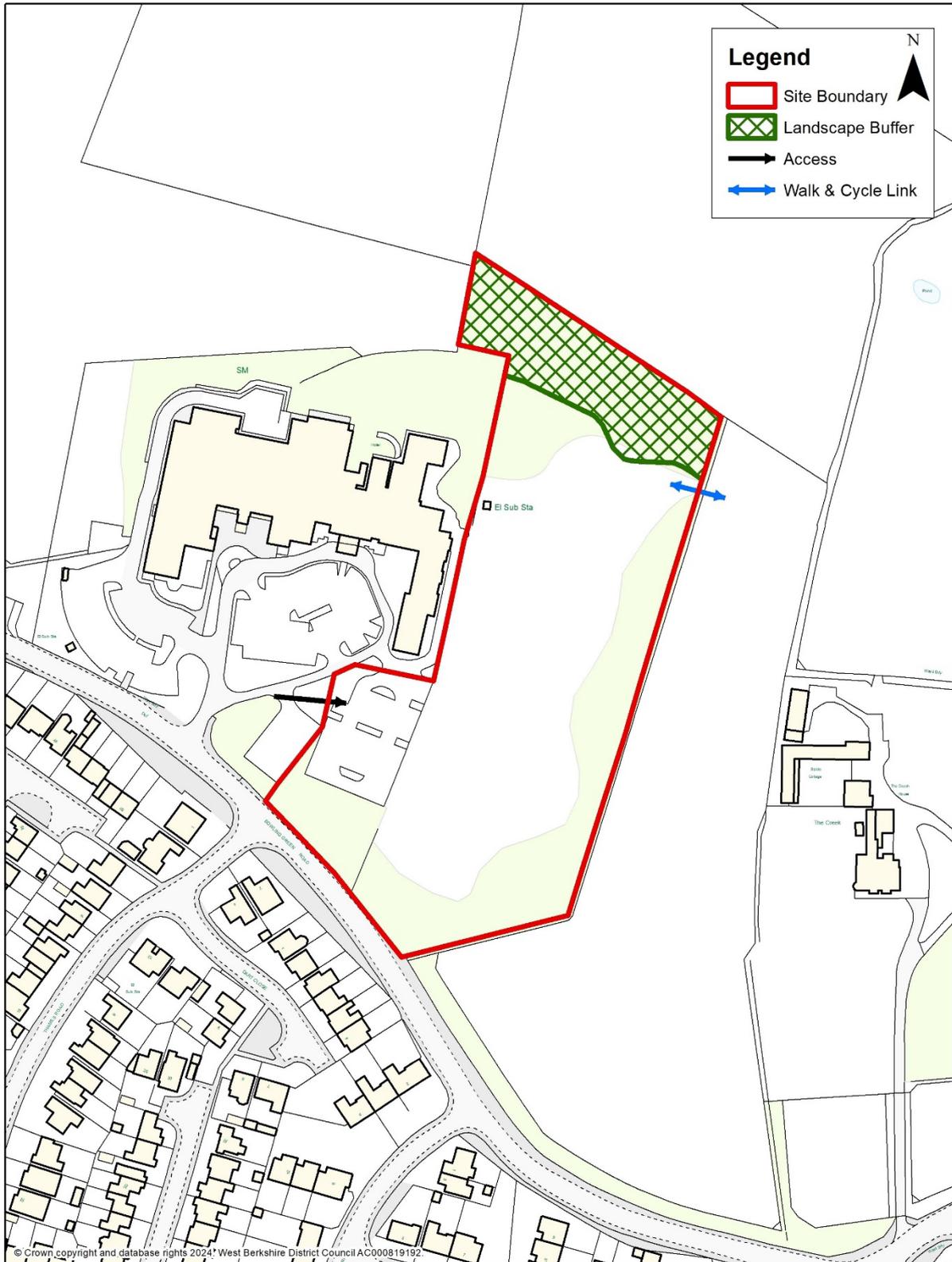
Policy RSAX

Land East of Regency Park Hotel, Bowling Green Road, Thatcham (Site ref CA17)

The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:

- m. The provision of approximately 45 dwellings;
- n. Access to the site will be provided via Bowling Green Road, using the existing access to the hotel. A walking and cycling link to the allocation RSAX (Land at Henwick Park) must also be provided;
- o. Main internal walking and cycling routes for the site will be provided, and will be linked to existing routes;
- p. Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment will be required;
- q. Measures will be included to improve accessibility by, and encourage the use of, non-car transport modes. These measures will be set out in a Travel Plan;
- r. The site will be developed in accordance with the Landscape Capacity Assessment (2015). The scheme will comprise a development design and layout in line with Policy SP7, that will be further informed by a full detailed Landscape and Visual Impact Assessment (LVIA), and will include the following measures:
 - i. No development above the 95 metre AOD contour;
 - ii. The balance of land in the north of the site to be retained as a landscape buffer which will be retained outside the settlement boundary for Thatcham;
 - iii. Reinforcement of the existing tree line along the Bowling Green Road, eastern, and northern boundaries; and
 - iv. Green Infrastructure to break up the built form;
- s. The development design and layout will be further informed by a Heritage Impact Assessment;
- t. Small areas of the site are at risk of surface water flooding. Development must be avoided within these areas;
- u. Development proposals for the site will be supported by a Flood Risk Assessment, in accordance with policy SP6, which will take into account the Thatcham Surface Water Management Plan;
- v. Sequential approach to the location of development;
- w. Development will be informed by an Ecological Impact Assessment (EclA); Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected; and
- x. Part of the site lies within a Mineral Safeguarding Area and so consideration of Policy 9 of the West Berkshire Minerals and Waste Local Plan will be required.

Land East of Regency Park Hotel, Bowling Green Road, Thatcham



Land at Pincents Lane, Tilehurst

Policy RSA X

Land at Pincents Lane, Tilehurst (Site Ref: TIL13)

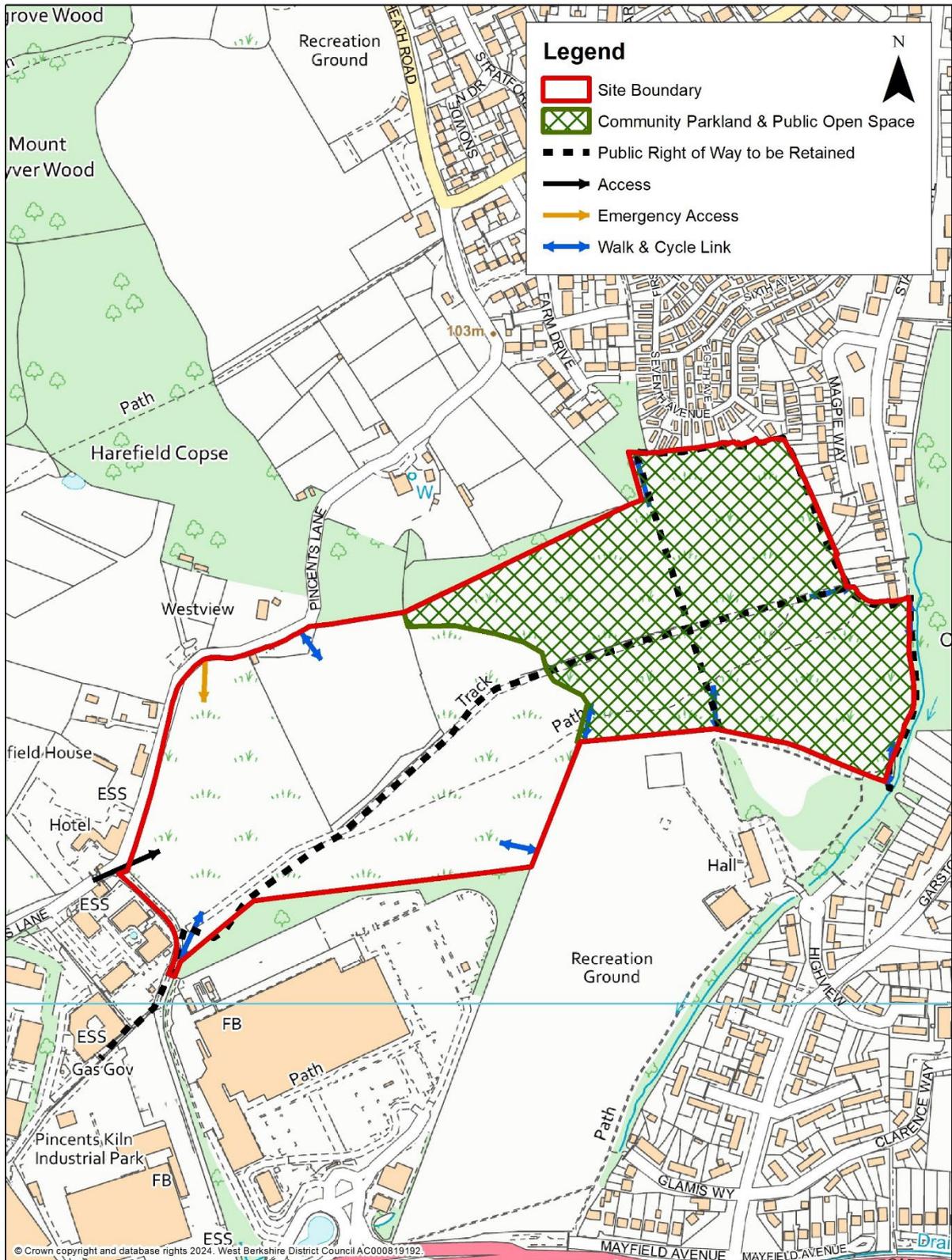
The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:

- a) The provision of approximately 138 dwellings, providing a mix of dwellings sizes and types including an element of specialised housing and custom and self-build units;
- b) Access to the site for vehicles to be obtained from Pincents Lane, with an additional emergency vehicle access to be provided;
- c) Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment will be required;
- d) Internal walking and cycle routes for the site will be provided and will be linked to existing routes, including existing Public Rights of Way which will be protected and enhanced;
- e) Measures will be included to improve accessibility by, and encourage use of, non-car transport modes. These measures will be set out in a Travel Plan;
- f) To ensure development on the site, conserves and enhances the North Wessex Downs National Landscape (AONB); retains open links between the recreation ground and the AONB and the wooded edge to the north and the east; and to maintain the containment of Tilehurst beyond the existing strong wooded buffer including Withy Copse and Oliver's Copse, the site will be developed in accordance with the Landscape Capacity Assessment¹ for the site as follows:
 - i. development will be expected to be contained below 75m AOD contour. Any minor extensions above 75m shall not exceed 80m AOD and would need to demonstrate that the development would not be visually prominent from sensitive viewpoints;
 - ii. development will be contained to the area west of the existing conifer line between the existing retail units and the recreation ground. Replacement of conifer line with native woodland belt and creation of pedestrian links to the recreation ground to be considered;
 - iii. retain open views from the A4 and the recreation ground to the wooded skyline;
 - iv. include substantial 15m wooded landscape buffer along the east site of Pincents Lane to retain the rural character of the AONB;
 - v. reinforce wooded skyline and woodland links between AONB and Withy and Oliver's Copses;

¹ Landscape Capacity Assessment of Potential Housing Sites within and adjacent to the North Wessex Downs Area of Outstanding Natural Beauty: Eastern Urban Area Additional Sites (August 2015)

- vi. reinforce the tree belt along the southern edge of the site towards the adjoining commercial area;
- vii. avoid creating isolated built form through the creation of landscaped links into adjoining built form;
- g) The design and layout of the development will be in accordance with policy SP7 and be further informed by a full and detailed Landscape and Visual Impact Assessment (LVIA);
- h) A key part of this development allocation will be the establishment of community parkland to be provided as public open space in perpetuity on the eastern part of the site. This area of land will remain outside the settlement boundary;
- i) The development will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented to ensure any designated sites and/or protected habitats and/or species are not adversely affected;
- j) Provide an appropriate buffer of at least 15 metres between the development and ancient woodland. The precise buffer will be determined through detailed assessment and design when proposals are submitted for development;
- k) The development will be informed by a Tree Survey due to the presence of TPOs on the site.
- l) The development will be informed by a Flood Risk Assessment (FRA) which will take into account all potential sources of flood risk, including surface water flooding, and will advise on any appropriate mitigation measures;
- m) Given the proximity of the site to the M4 and adjacent commercial area the development will be informed by a noise and air quality survey which will advise on appropriate mitigation measures, where necessary;
- n) A Heritage Impact Assessment (HIA) will be required to inform the development;
- o) Development will be informed by an archaeological desk-based assessment as a minimum and field evaluation if required to assess the historic environment potential of the site.
- p) Development will be informed by a desk-based assessment (as a minimum) detailing the likelihood and extent of land contamination, followed by, where necessary, an intrusive investigation and undertaking of appropriate remediation measures. Further monitoring may be required depending on the nature of contamination and remediation;
- q) Much of the site lies within a Mineral Safeguarding Area, and so the scheme will be informed by the Minerals Resource Assessment already undertaken for the site; and
- r) The development design will 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.

Land at Pincents Lane, Tilehurst



Land north of Pangbourne Hill, Pangbourne

Policy RSAX

Land north of Pangbourne Hill, Pangbourne (Site ref PAN8)

The site, as shown on the indicative map, will be required to be developed in accordance with the following parameters:

- a. The provision of approximately 25 dwellings, in a low density scheme;
- b. Access to the site will be provided via Sheffield Close, off Pangbourne Hill;
- c. Measures will be provided to mitigate the impact of development on the local road network. A Transport Assessment will be required. The following elements shall be undertaken to inform the Transport Assessment:
 - i. Updated speed surveys fronting the access onto Pangbourne Hill, with any required adjustments to sight lines provided;
 - ii. A Junction 10 PICADY traffic model submitted for the access onto Pangbourne Hill and for the Pangbourne Hill/A340 junction.
- d. Internal walking and cycle routes for the site will be provided and will be linked to existing routes;
- e. Measures will be included to improve accessibility by, and encourage use of, non-car transport modes. These measures will be set out in a Travel Information Pack;
- f. The scheme will be informed by a full detailed Landscape Visual Impact Assessment (LVIA) which takes account of the Landscape Sensitivity and Capacity Assessment (2020) (LSCA). The proposals will include the following measures:
 - i. To ensure it is not visually prominent, development will be limited to the lower slopes on the eastern side of the site only, adjacent to Riverview Road;
 - ii. No development shall be located on the elevated upper slopes in order to conserve and enhance the National Landscapes (AONB) of both the North Wessex Downs and the Chilterns. This part of the site will be retained as a landscape buffer which will remain outside the settlement boundary;
 - iii. Buffer planting placed along the western edge of the development to conserve and enhance the National Landscape (AONB) and mitigate the impact of the development;
- g. An arboricultural survey will be required to inform the delivery of the site, to take into account the protected trees adjacent to the site on the eastern side;
- h. Development proposals for the site will be supported by a Flood Risk Assessment, in accordance with Policy SP6, which will take into account the SuDS SPD.
- i. Development will be informed by an Ecological Impact Assessment (EclA). Appropriate avoidance and mitigation measures will need to be implemented, to ensure any designated sites and/or protected habitats and/or species are not adversely affected;

