

**West Berkshire Council**  
**Local Plan Review 2022-2039**

**Local Plan Review 2022-2039**  
**Examination**

**Written Statement for Matter 11**

**Economic development**

**April 2024**

## West Berkshire Local Plan Review 2022-2039 (LPR) Examination

### West Berkshire Council

#### Written Statement for Matter 11: Economic development

**Response to each question raised by the Inspector:**

#### M11.1 Strategic approach to employment land (policy SP20)

**Q11.1. (a) Is the approach in policy SP20 to considering proposals that would result in the loss of existing employment uses outside designated employment areas justified and consistent with national policy?  
(b) Are the modifications to policy SP20 proposed by the Council necessary to make the Plan sound?**

- 1.1. (a) the Council considers that the approach in Policy SP20 to considering proposals that would result in the loss of existing employment uses outside designated employment areas is justified and consistent with national policy. Criterion f, g and h of Policy SP20 refer to proposals outside a DEA but within settlement boundaries, and criterion i relates to proposals in the countryside that are located outside a DEA.
- 1.2. The ELR ([EMP3](#) and [EMP4](#)) provides an assessment of need for employment land over the plan period. The Study recommends a requirement of approximately 91,000sqm of industrial floorspace and approximately 51,000sqm of office floorspace over the period to 2039. From the supporting text to Policy SP20 it is clear that over the plan period there is a lack of supply of suitable sites to meet the identified need.
- 1.3. As such, Policy SP20 seeks to ensure that any losses of business use outside of DEA's are justified and appropriate. This includes, ensuring that such proposals would not substantially prejudice the supply of employment land over the plan period, and would not undermine existing neighbouring economic uses by conflicting with the agent of change principle as set out in NPPF ([NAT1](#)) paragraph 187.
- 1.4. In addition, the policy seeks to ensure that where a proposal seeks the loss of office space within a town or district centre, that such a loss would not undermine the vitality of the centre. This is consistent with Chapter 7 of the NPPF ([NAT1](#)) which promotes the long-term vitality and viability of town centres, ensuring positive growth, management and adaptation.
- 1.5. The approach set out in Policy SP20 is justified and consistent with the aims of paragraph 81 of the NPPF ([NAT1](#)) requiring policies to support economic growth, and helping to create the conditions for businesses to invest, expand and adapt. This is particularly relevant where such losses could lead to unjustified reductions in supply which evidence indicates will be required to meet identified needs.

- 1.6. With regard to the loss of business uses within the countryside, Policy SP20 seeks to support a prosperous rural economy in accordance with paragraph 84 of the NPPF ([NAT1](#)) and as set out in Policy DM35.
- 1.7. The NPPF ([NAT1](#)) (paragraphs 84-85) advise that planning policies and decisions should enable the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings. These are vital to providing local job opportunities and diversifying the rural economy.
- 1.8. Most of the District is a designated rural area which hosts a large number of small and medium sized enterprises outside of the main built-up areas and the designated employment areas.
- 1.9. Under Policy DM35 proposals resulting in the loss of existing business sites and premises in the countryside, will therefore only be permitted where the applicant can demonstrate that no alternative economic use can be found, and that the proposal does not have a significant negative impact upon the vitality and viability of the local economy of the surrounding rural area.
- 1.10. Where re-use of buildings is proposed, re-use for business is the Council's preference, in order to safeguard the local economy. Notwithstanding this the policy does offer some flexibility in acknowledging that for some buildings future economic use is not viable. Applicants will be expected to demonstrate that if this is the case, no alternative economic use can be found, and the proposal does not have a significant negative impact upon the vitality and viability of the local economy of the surrounding rural area.
- 1.11. b) Yes, the Council considers that the modifications it proposed are necessary to make the Plan sound. It refers to its responses to PQ14 (in [EXAM2](#) pages 20-30) to the Inspector's Preliminary Questions ([IN2](#)).
- 1.12. The modifications were proposed as a result of proposing the deletion of Policy SP21, and the Council consider them necessary for the clarity and effectiveness of the policy. The modifications ensure the overall vision and strategic approach to employment land is clear within the LPR, in accordance with paragraph 82 of the NPPF.

#### **M11.2 Designated employment areas (policies SP21 and DM32 and Appendix 4)**

<b>Q11.2. Are the designated employment areas, including the detailed boundaries, as shown on the policies map justified?</b>
---

- 1.13. Yes, the designated employment areas (DEA), including the detailed boundaries as shown on the Policies Map are justified.

- 1.14. Paragraphs 78 to 87 of the Employment Background Paper ([EMP5](#)) sets out the approach to Designated Employment Areas (DEA). Largely, with the exception of three, these are existing parcels of land designated across the District for office, industrial, storage and distribution uses. The Core Strategy policy CS9 ([SD1](#)) commits the Council to a review of the District's Protected Employment Areas (PEA), renamed DEA through the LPR, and this work was undertaken as part of the LPR. The review took a two-stage approach as outlined in [EMP5](#).
- 1.15. Firstly, the Employment Land Review (ELR) 2020 ([EMP3](#)) considered and assessed each of the 20 PEAs identified in Appendix G of the Core Strategy, along with other parcels of established employment land. The assessment of these areas was updated as part of the ELR 2022 ([EMP4](#)). Appendix C of the ELR 2022 sets out the updated assessments and recommendations.
- 1.16. To supplement the ELR assessments, the Council undertook further work to determine where land had been lost to or gained from other uses, for example through office to residential conversions, that would warrant amendments to the boundary either by way of an extension or reduction where appropriate. This work used publicly available information, including planning records, online mapping, and aerial photography, along with site visits. A number of sites were promoted through the HELAA and/or Regulation 18 consultation seeking DEA boundary changes, and these sites were also considered through this process.
- 1.17. Appendix 1 of [EMP5](#) contains a full list of the DEA as set out in the LPR with accompanying maps showing the boundaries and any amendments. The changes reflect where land has been lost to alternative uses and/or where there have been gains of business development/uses.

**Q11.3. Is the approach in policy DM32 to considering proposals for different types of development in designated employment areas justified and consistent with national policy?**

- 1.18. Yes, the approach in Policy DM32 to considering proposals for different types of development in DEA is justified and consistent with national policy.
- 1.19. The approach in the policy is outlined in paragraphs 78 - 87 of the Council's Employment Background Paper ([EMP5](#)).
- 1.20. As set out above the Council's evidence base identified the needs for both office and industrial floorspace over the plan period. As part of this work the ELR ([EMP3](#) and [EMP4](#)) considered and assessed each of the 20 PEAs identified in Appendix G of the Core Strategy ([SD1](#)), along with other parcels of established employment land, and recommends the safeguarding of these areas. These areas are often in suitably accessible locations and provide sufficient segregation from non-business uses to minimise the possibility of conflict. Policy DM32 therefore seeks to safeguard the DEA for business uses

with the aim of protecting and strengthening the function and integrity of these areas, and ensuring a supply of sites and premises of the right quality, size and type in the right locations.

- 1.21. Whilst it is important to safeguard these areas for the role they play in providing a supply of employment land to meet existing and future needs of businesses, it is also considered important to allow for some diversity of uses within the DEA to create the right conditions for businesses to invest, expand and adapt. As such, complementary uses may be permitted where they support the primary function of the DEA. This could include small-scale shops, gym or café, subject to the sequential test as set out in national policy ([NAT1](#), para 87). The addition of alternative employment generating uses should not undermine, either individually or cumulatively, the integrity and function of the DEA.
- 1.22. The Council acknowledges that the changes to the Use Classes Order, in particular the change in classification of offices from B1a to Class E along with former A1, A2 and A3 uses, is likely to have some impact on the DEA, but the extent to which is currently unknown. As outlined within the Council's evidence, [EMP3](#) and [EMP4](#), the District has experienced losses, particularly in and around Newbury, of offices to residential uses through permitted development which has impacted upon supply. Supporting text to Policy DM32 at paragraph 12.8 outlines that the Council will monitor such losses and review if action is required through the use of conditions and/or planning obligations to maintain the supply of employment land.
- 1.23. It is considered this policy approach is justified and assists in creating conditions where businesses can invest, expand and adapt (NPPF para 81, [NAT1](#)). It also promotes local inward investment to assist in meeting anticipated needs over the plan period and enables businesses to respond rapidly to changes in economic circumstances (NPPF, para 82, [NAT1](#)).

### **M11.3 Sites allocated for industrial and warehouse development (policies ESA1 to ESA6)**

<b>Q11.4. Are the allocations of sites ESA1 to ESA6 for industrial and/or storage and distribution uses, and the detailed boundaries to each, justified?</b>
--

- 1.24. Yes, the allocations of sites ESA1 to ESA6 for industrial and/or storage and distribution uses, and the detailed boundaries of each site, are justified.
- 1.25. The Site Selection Methodology Paper ([SIT1](#)) sets out the approach taken to selecting sites within the LPR. This includes how sites were identified through the 'call for sites' process, and how sites were then assessed and selected through the Housing and Economic Land Availability Assessment (HELAA) ([SIT4a](#) – [SIT4e](#)) and Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) ([CS3a](#) – [CD3k](#)).

- 1.26. The Housing and Economic Land Availability Assessment (HELAA) ([SIT4a](#) – [SIT4e](#)) provides a detailed assessment of all the sites promoted to the Council. The HELAA has been prepared in accordance with the joint HELAA methodology<sup>1</sup> that was developed and prepared with four other Berkshire authorities (Reading Borough Council, the Royal Borough of Windsor and Maidenhead, Slough Borough Council, and Wokingham Borough Council), and the joint methodology is based on, and complies with, the standard methodology in the PPG.
- 1.27. Through the HELAA assessments it has been possible to determine those sites which are suitable, achievable and available, and thus have potential for development. A significant amount of information informs the assessment of suitability, involving service providers from across the Council and external organisations and consultees. Sites have been assessed using the latest information available at the time of the assessment. The SA/SEA ([CS3a](#) – [CD3k](#)) then considered those sites which the HELAA concluded were deliverable or potentially developable. SA/SEA appraises the sustainability of the site to ensure the promotion of sustainable development within the LPR, through the integration of environmental, social and economic considerations.
- 1.28. With regard to the proposed use of each allocated site, where a site has been promoted for a particular employment use(s), this use(s) has been taken forward for consideration within the HELAA assessment, unless there was a clear reason why a particular use would not be appropriate within the location. If a site promoter did not specify the type of employment use for the site, the potential for both offices and industrial/warehousing uses was considered.
- 1.29. In assessing sites promoted for employment uses, the ELR ([EMP3](#) and [EMP4](#)) assessed the sites from a property market perspective, to determine the likely attractiveness of each site to potential developers and future occupiers for office and/or industrial use. The recommendations of which are set out within Chapter 6 of the ELR Addendum 2022 ([EMP4](#)) and its associated Appendix C.
- 1.30. In considering the employment land requirements over the plan period, the Employment Land Review categorised the requirement as either offices (Class Egi/ii) or industrial and warehousing (Class Egiii/B2/B8). The ELR combines logistics and distribution activity (B8) in with industrial activity (B2) to create one B2/B8 category because in practice it is difficult to distinguish between premises used for these purposes and the uses are generally interchangeable. To align with this evidence base, the LPR has also taken this approach. The LPR makes clear that no suitable and available sites for office development have been identified through the plan making process. As such, the site allocations within the LPR contribute to the industrial and warehousing requirement to 2039 as the uses fall within this category of demand (Class Egiii/B2/B8).

---

<sup>1</sup> Berkshire Housing and Economic Land Availability Assessment Methodology (November 2016)  
<https://www.westberks.gov.uk/helaa>

1.31. The below table sets out each site allocation and outlines the use proposed by the site promoter along with the use proposed in the LPR.

Policy no. / HELAA site ref.	Site name	Use(s) proposed by site promoter	Use(s) proposed in LPR	LPA Comments
ESA1 (MID5)	Land east of Colthrop Industrial Estate, south of A4 Bath Road, Thatcham	B2/B8	B2/B8	Promoted use consistent with proposed use in LPR.  Proposed in LPR for B2/B8 to align with the approach taken in ELR.  The site has extant planning permission for B2/B8 (21/02130/OUTMAJ)
ESA2 (LAM6)	Land west of Ramsbury Road, Walkers Logistics Holding Ltd, Membury, Lambourn Woodlands	B8	B2/B8	Proposed in LPR for B2/B8 to align with the approach taken in ELR.  The site has extant planning permission for B8 with ancillary uses (19/02979/OUTMAJ and 22/00897/RESMAJ)
ESA3 (LAM10)	Land south of Trinity Grain, Ramsbury Road, Membury	Office (Egi/ii) but also stated other commercial / industrial uses would be appropriate	Egiii/B2	Offices considered inappropriate in this location. Site also assessed for uses consistent with B2/B8.  The use on this site is limited specifically to industrial uses given concerns over traffic impact around Membury Industrial Estate and market assessment in ELR (EMP4)
ESA4 (BEEN3/5)	Beenham Landfill, Pips Way, Beenham	B2/B8	B2/B8	Promoted use consistent with proposed use in LPR.  Proposed in LPR for B2/B8 to align with the approach taken in ELR.
ESA5 (BEEN10)	Northway Porsche, Grange Lane, Beenham	Car based restoration and associated automotive services.	Egiii/B2	Promoted use consistent with proposed use in LPR.  Land Use Gazetteer categorises car-based restoration as a B2 use.  Given nature of the site a B8 use is considered inappropriate, therefore the use on this site is limited specifically to industrial uses.
ESA6 (PAD4)	Land adjacent to Padworth Waste Centre, Padworth Lane, Lower Padworth	Employment (specific use not specified)	B2/B8	Specific employment use not specified. Offices considered inappropriate in this location.  Proposed in LPR for B2/B8 to align with the approach taken in ELR.

- 1.32. In terms of the detailed boundaries, the site boundary as submitted by the site promoter was considered for the HELAA assessment.
- 1.33. In this response the detailed site boundary is taken to be the red line as depicted on the indicative map for each ESA policy within the LPR. Through the assessment of each site mitigation measures have been identified where appropriate, and in some cases, this has led to a reduced developable area and ultimately a lower development potential, than the whole of the site area.
- 1.34. With regard to each employment site allocation the table below highlights where amendments have been made with a brief explanation as to why.

Policy no. / HELAA site ref.	Site name	Site boundary commentary
ESA1 (MID5)	Land east of Colthrop Industrial Estate, south of A4 Bath Road, Thatcham	Site boundary in LPR is the same as that promoted through the HELAA.
ESA2 (LAM6)	Land west of Ramsbury Road, Walkers Logistics Holding Ltd, Membury, Lambourn Woodlands	<p>Site boundary in LPR is the same as that promoted through the HELAA as 'area suitable for development'.</p> <p>The promoters of this site submitted two plans as part of the HELAA process. The first detailed a wider site of 14.5ha and the second was a portion of the wider site titled 'area suitable for development' at 6.9ha. For completeness the wider site (14.9ha) was entered into the HELAA process and mapped, but it was made clear within the assessment that the smaller area of 6.9ha was that considered suitable for development as per the site promoters' submission. This smaller site area (6.9ha) has been taken forward in the LPR.</p> <p>In addition, as assessment of landscape sensitivity and capacity on the wider site (14.5ha) (<a href="#">LAN7a</a>) verified the Council's approach, as it concluded that development across the whole of the site would be inappropriate. It recommended that two small parcels of land within the wider site could be considered for development with mitigation measures to minimise any landscape impact. One of these parcels of land is already developed and in use by the site promoter, and the other parcel of land has been allocated within the LPR. This allocated parcel of land corresponds with the area promoted through the HELAA as 'area suitable for development'.</p>
ESA3 (LAM10)	Land south of Trinity Grain, Ramsbury Road, Membury	The site boundary in the LPR is the same as that promoted through the call for sites.
ESA4 (BEEN3/5)	Beenham Landfill, Pips Way, Beenham	The site boundary in the LPR is a combination of the southern part of BEEN3 and the northern part of BEEN5. Both sites are in the same ownership and lie adjacent to each other. As set out in the SA/SEA, during the preparation of the LPR it was confirmed that only part of each site was available and as such the two available parcels of land were combined to create one site, with the agreement of the landowner.



ESA5 (BEEN10)	Northway Porsche, Grange Lane, Beenham	The site boundary in the LPR is the same as that promoted through the HELAA.
ESA6 (PAD4)	Land adjacent to Padworth Waste Centre, Padworth Lane, Lower Padworth	The site boundary in the LPR is the same as that promoted through the HELAA.

**Q11.5. Will policies ESA1 to ESA6 be effective in ensuring that each allocation is developed in a satisfactory manner? In particular with regard to:**

- (a) The type and scale of development proposed on each site.**
- (b) Provision of safe and suitable access, including by sustainable modes, and mitigation of impacts on the transport network.**
- (c) Mitigation of impacts on the character and appearance of the area, including rural landscape.**
- (d) Mitigation of impacts on biodiversity.**
- (e) Requirements relating to heritage assets and archaeological assessments.**
- (f) Mitigation of air, water, noise and light pollution.**
- (g) Waste water treatment infrastructure.**

1.35. Each site allocation is identified on an indicative site map within the LPR and on the Policies Map, and each of the site-specific policies, ESA1 – ESA6, contain a number of development parameters to guide the development to ensure the effective delivery of the allocation. The development parameters have been derived from the technical work informing the site assessments and seek to achieve the most appropriate development on site taking into account opportunities and constraints. Further detail regarding the site assessments can be found within the HELAA ([SIT4a](#) – [SIT4e](#)).

1.36. Taking each policy in turn:

#### **ESA1 Land east of Colthrop Industrial Estate, Thatcham**

1.37. Yes, the Council considers that with the modifications proposed below, policy ESA1 will be effective in ensuring that a scheme is developed in a satisfactory manner, and commentary in relation to each point is noted below:

- a) The site has been proposed for allocation for B2 and/or B8 uses which are complementary to the employment offering already present at Colthrop Industrial Estate. The site is located adjacent to the existing Colthrop Industrial Estate which is a designated Protected Employment Area. These uses are also suitable for the location, being on the A4 which is a Freight Route. In terms of the scale of the proposed development, all sites promoted for employment uses were assessed consistently through the HELAA process. The floorspace figures have been calculated using standard plot ratios, applied to the developable area of each site. Details are set out in the HELAA Report ([SIT4a](#)).

- b) Access will be provided from the A4, as required by criterion b) and this has been informed by the Council's Highways and Transport team. A Transport Assessment will be required, and criterion c) requires measures to be provided to mitigate the impact of development on the local road network. The site is in a sustainable location benefitting from walking, cycling and public transport routes, and is reasonable distance of residential development as a potential source of employees. Whilst a Travel Plan is not required specifically by the policy the location makes the option of travelling without a private car more attractive to employees, and should it be considered a Travel Plan is necessary this can be sought under policy SP23.
- c) Criterion d) requires the design and layout to be in accordance with policy SP7 and further informed by a full detailed Landscape and Visual Impact Assessment (LVIA). The design, tree planting, colour scheme and roof treatment should consider the site's location as a gateway to Thatcham. To help mitigate any visual impact on the wider landscape to the east criterion e) also requires the development to be set back from the A4 and the eastern site boundary to allow for a tree planted landscape buffer, extending the existing wooded edge of Colthrop Industrial Estate, this will aid in softening the development when viewed from the east.
- d) Thames Valley Environmental Records Centre has advised that there is the potential for Great Crested Newts in the area. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected. In addition, due to the presence of TPOs on the western side of the site, the policy requires a Tree Survey to inform development proposals.
- e) The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and to ensure consistency across all the site allocation policies, proposes a minor modification to the policy as follows:
- “j) 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.”
- f) The policy contains a number of criteria which will seek to mitigate air, water, noise and light pollution. As part of the mitigation needed for priority species/designated habitats and species measures for external lighting design will be required (criterion h). Criterion k) requires that development will be informed by a desk based assessment detailing the likelihood and extent of land contamination, with potential further investigation and monitoring, and remediation. Criterion h) requires that development will be informed by a Flood Risk Assessment, with appropriate mitigation including SuDS. SuDS can filter pollutants. Criterion l) requires that the development design will be designed for climate resilience, including maximising the efficient use of sustainable technologies. The policy does not specifically include a criterion relating to air pollution, however this would be considered under policy DM5 which seeks to ensure that development will not lead to adverse effects on

pollution of the environment, and contains criteria regarding air, water, noise and light pollution.

- g) To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all site allocation policies, proposes a main modification to the policy as criterion m) as follows:

m) 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'

- 1.38. The site has extant planning permission (21/02130/OUTMAJ) for commercial B2 (general industrial) and/or B8 (storage and distribution) development together with ancillary office space. Since this consent was granted there has been a change in land ownership and a new planning application is currently pending determination (23/02965/FULMAJ) for approximately 7,800sqm accommodating offices, laboratories and associated ancillary uses.

### **ESA2 Land west of Ramsbury Road, Membury Industrial Estate, Lambourn Woodlands**

- 1.39. Yes, the Council considers that with the modifications proposed below, policy ESA2 will be effective in ensuring that a scheme is developed in a satisfactory manner, and commentary in relation to each point is noted below:

- a) The site has been proposed for allocation for B2 and/or B8 uses which are complementary to the employment offering already present at Membury Industrial Estate. This site will form an extension to the Estate which is currently a designated Protected Employment Area. In terms of the scale of the proposed development, all sites promoted for employment uses were assessed consistently through the HELAA process. The floorspace figures have been calculated using standard plot ratios, applied to the developable area of each site. Details are set out in the HELAA Report ([SIT4a](#)). The scale of the development is appropriate when considering the location within the North Wessex Downs National Landscape (AONB), and the recommendations of the Landscape Sensitivity and Capacity Assessment ([LAN7a](#)). The floorspace requirement for this site reflects the approved floorspace under extant planning permission.
- b) Access to the site will be provided from Ramsbury Road and, through consultation with the Council's Highways and Transport team, a Transport Assessment is required which will provide measures to mitigate the impact of

the development on the local road network. Given the location of the site, the policy requires the submission of a Travel Plan which will include measures to improve accessibility by, and encourage use of, non-car transport modes.

- c) A Landscape Sensitivity and Capacity Assessment was undertaken for the site in September 2021 (LCA, [LAN7a](#)). The recommendations of the LCA have been included under Criterion e). It is considered that such design parameters will aid in mitigating the impact of development on the rural character and of the AONB, whilst also recognising the site's position adjacent to an existing industrial area. As highlighted in the LCA a landscape buffer should be created and retained and the heights of the buildings should be limited so they do not protrude above the treeline to the west. It is also important to consider façade treatment on the eastern flank walls of buildings to reduce their visual prominence and the access to the developable area should be low key and rural in character. The design and layout of the development will be further informed by a Landscape and Visual Impact Assessment (LVIA).
- d) BBOWT has advised to the Regulation 18 consultation that the site is within 4km of the River Lambourn Special Area of Conservation and within 0.5km of at least one Ancient Woodland. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- e) Criterion g) of the policy, which is supported by Historic England, requires that the development will be informed by a Heritage Impact Assessment due to the presence of a nearby Scheduled Monument, to assess any assets linked with the former military airfield, and to consider the significance of Lyckwood Farm (Grade II) and any mitigation needed to reduce harm.

In addition, the Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and to ensure consistency across all the site allocation policies, proposes a minor modification to the policy as follows:

“m) 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.”

- f) With regard to the mitigation of air, water, noise and light pollution, the policy requires that development will be informed by a Flood Risk Assessment, with appropriate mitigation including SuDS. SuDS can filter pollutants. There are no explicit criteria for air, noise and light pollution. However, given the location within the North Wessex Downs National Landscape (AONB) it is likely that the requirements of policy SP2 and the LVIA will review external lighting. Policy DM5 also seeks to ensure that development will not lead to adverse effects on pollution of the environment, and contains criteria regarding air, water, noise and light pollution.
- g) To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and

drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all site allocation policies, proposes a main modification to the policy as criterion l) as follows:

l) 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'

### **ESA3 Land to the south of Trinity Grain, Membury Industrial Estate, Lambourn Woodlands**

1.40. Yes, the Council considers that with the modifications proposed below, policy ESA3 will be effective in ensuring that a scheme is developed in a satisfactory manner, and commentary in relation to each point is noted below:

- a) The site has been proposed for allocation for B2 and/or Eg(iii) uses which are complementary to the employment offering already present at Membury Industrial Estate. This site will form an extension to the Estate which is currently a designated Protected Employment Area. In terms of the scale of the proposed development, all sites promoted for employment uses were assessed consistently through the HELAA process. The floorspace figures have been calculated using standard plot ratios, applied to the developable area of each site. Details are set out in the HELAA Report ([SIT4a](#)). The scale of the development is appropriate when considering the location within the North Wessex Downs National Landscape (AONB), and the recommendations of the Landscape Sensitivity and Capacity Assessment ([LAN8d](#)).
- b) Access to the site will be provided from Ramsbury Road and, through consultation with the Council's Highways and Transport team, a Transport Assessment is required which will provide measures to mitigate the impact of the development on the local road network. Given the location of the site, the policy requires the submission of a Travel Plan which will include measures to improve accessibility by, and encourage use of, non-car transport modes.
- c) A Landscape Sensitivity and Capacity Assessment (LCA, [LAN8d](#)) was undertaken for the site in June 2022. The recommendations of the LCA have been included under criterion e). It is considered that such design parameters will aid in mitigating the impact of development on the rural character and of the AONB, whilst also recognising the site's position adjacent to an existing industrial area. As highlighted in the LCA the tree belt/hedgerow along the eastern site boundary is to be retained, along with the woodland copse within the southern part of the site. It is also important that the building heights should not be visible above the adjacent silo towers and the tree canopy from

the wider landscape. The design and layout of the development will be further informed by a Landscape and Visual Impact Assessment (LVIA).

- d) BBOWT advised that the site is of raised ecological interest due to the matrix of grassland, scrub and trees present. Although not protected, these habitats are of greater ecological value than more intensively managed farmland sites. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- e) Criterion g) which is supported by Historic England, requires that the development will be informed by a Heritage Impact Assessment due to the presence of a nearby Scheduled Monument, to assess any assets linked with the former military airfield, and to consider the significance of Lyckwood Farm (Grade II) and any mitigation needed to reduce harm.

In addition, the Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and to ensure consistency across all the site allocation policies, proposes a minor modification to the policy as follows:

“l) 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.”

- f) With regard to the mitigation of air, water, noise and light pollution, the policy requires that development will be informed by a Flood Risk Assessment, with appropriate mitigation including SuDS. SuDS can filter pollutants. There are no explicit criteria for air, noise and light pollution. However, given the location within the AONB it is likely that the requirements of policy SP2 and the LVIA will review external lighting. Policy DM5 also seeks to ensure that development will not lead to adverse effects on pollution of the environment, and contains criteria regarding air, water, noise and light pollution.
- g) To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all site allocation policies, proposes a main modification to the policy as criterion k) as follows:

k) ‘An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.’

**ESA4 Beenham Landfill, Pips Way, Beenham**

- 1.41. Yes, the Council considers that with the modification proposed below, Policy ESA4 will be effective in ensuring that a scheme is developed in a satisfactory manner, and commentary in relation to each point is noted below:
- a) The site has been proposed for allocation for B2 and/or B8 uses which are complementary to the employment offering already present at Beenham Industrial Estate. This site will form an extension to the Estate which is currently a designated Protected Employment Area. The use is also suitable for the location, being on the A4 which is a Freight Route. In terms of the scale of the proposed development, all sites promoted for employment uses were assessed consistently through the HELAA process. The floorspace figures have been calculated using standard plot ratios, applied to the developable area of each site. Details are set out in the HELAA Report ([SIT4a](#)). The scale of the development is appropriate when considering the location within the North Wessex Downs National Landscape (AONB), and the recommendations of the Landscape Sensitivity and Capacity Assessments ([LAN8k](#) and [LAN8m](#)).
  - b) The policy outlines that access will be provided from Pip's Way, accessed off the A4/A340 roundabout and this has been informed by the Council's Highways and Transport team. A Transport Assessment is required which will provide measures to mitigate the impact of the development on the local road network, and in particular the impact on the A340/A4 roundabout. The site is in a sustainable location benefitting from public transport routes, and the A4 is relatively wide in this location potentially enabling cycling. Whilst a Travel Plan is not required by the policy the location makes the option of travelling without a private car more attractive to employees, and should it be considered a Travel Plan is necessary this can be sought under policy SP23.
  - c) A Landscape Sensitivity and Capacity Assessment undertaken for the two sites BEEN3 and BEEN5 in June 2022 (LCA, [LAN8k](#) and [LAN8m](#)). As set out in the SA/SEA during the preparation of the LPR it was confirmed that only part of each site was available and as such the two available parcels of land were combined to create one site. The recommendations from the LCAs have been included under criterion d). It is considered that such design parameters will aid in mitigating the impact of development on the rural character and of the North Wessex Downs National Landscape (AONB), whilst recognising the site's position adjacent to an existing industrial area. As highlighted in the LCA the newly planted wooded bund along the SW edge of the site is to be retained and enhanced, along with the creation of a landscape buffer along the NW and SE boundaries. A landscape buffer to the wider AONB is also required along the NE boundary to strengthen the existing woodland belts which enclose the site by additional tree planting. It is important that the scale of development is restricted, and consideration given to the height and colour of buildings, along with the style, and roof profile to avoid adverse visual impact on adjacent areas of the AONB. The use of close boarded fencing in areas visible from the PRow should be avoided, and any external lighting, if required, should be minimal. The policy requires that the design and layout of

the development will be further informed by a Landscape and Visual Impact Assessment (LVIA).

- d) BBOWT has advised to the Regulation 18 consultation that the site is within 1 km of at least one SSSI and within 0.5km of at least one Ancient Woodland. There is also the potential for Great Crested Newts in the area. Therefore, the policy requires an EcIA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- e) There are no criteria in relation to heritage assets and archaeological assessments. No such assessments were identified as necessary from the relevant service providers (Council conservation and archaeology services, and Historic England).
- f) The policy contains a number of criteria which will seek to mitigate air, water, noise and light pollution. External lighting will need to be considered in the design, as set out in point iii) of criterion d). Criterion h) requires that development will be informed by a desk based assessment detailing the likelihood and extent of land contamination, with potential further investigation and monitoring, and remediation. The policy also requires that development will be informed by a Flood Risk Assessment, with appropriate mitigation including SuDS. SuDS can filter pollutants and requires that the development design will be designed for climate resilience, including maximising the efficient use of sustainable technologies. The policy does not specifically include a criterion relating to air pollution, however this would be considered under policy DM5 which seeks to ensure that development will not lead to adverse effects on pollution of the environment, and contains criteria regarding air, water, noise and light pollution. In addition, the Council are working with the Environment Agency (EA) to prepare a Statement of Common Ground (SoCG) to address concerns raised through their Regulation 19 representations.
- g) To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all site allocation policies, proposes a main modification to the policy as criterion k) as follows:
- k) 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'



**ESA5 Northway Porsche, Grange Lane, Beenham**

- 1.42. Yes, the Council considers that with the modification proposed below, Policy ESA5 will be effective in ensuring that a scheme is developed in a satisfactory manner, and commentary in relation to each point is noted below:
- a) The site has been proposed for allocation for B2 and/or E(g)(iii) uses which are complementary to the employment offering already present at Beenham Industrial Estate. This site will form an extension to the Estate which is currently a designated Protected Employment Area. The use is also suitable for the location, being on the A4 which is a Freight Route. In terms of the scale of the proposed development, all sites promoted for employment uses were assessed consistently through the HELAA process. The floorspace figures have been calculated using standard plot ratios, applied to the developable area of each site. Details are set out in the HELAA Report ([SIT4a](#)). The scale of the development is appropriate when considering the location within the North Wessex Downs National Landscape (AONB), and the recommendations of the Landscape Sensitivity and Capacity Assessment ([LAN8o](#)).
  - b) Access will be provided from the A4, using the existing access into the Industrial Estate and this has been informed by the Council's Highways and Transport team. A Transport Assessment is required which will provide measures to mitigate the impact of the development on the local road network, and in particular the impact on the A340/A4 roundabout. The site is in a sustainable location benefitting from public transport routes, and the A4 is relatively wide in this location potentially enabling cycling. Whilst a Travel Plan is not required by the policy the location makes the option of travelling without a private car more attractive to employees, and should it be considered a Travel Plan is necessary this can be sought under policy SP23.
  - c) A Landscape Sensitivity and Capacity Assessment (LCA, [LAN8o](#)) was undertaken for the site in June 2022. The recommendations of the LCA have been included under criterion d). It is considered that such design parameters will aid in mitigating the impact of development on the rural character and of the AONB, whilst also recognising the site's position adjacent to an existing industrial area. As highlighted in the LCA the retention of a landscape buffer between the site and the two adjacent PRoW is necessary, as well as retaining and providing an open setting for existing mature and trees of value. The scale and character of buildings should be considered, with particular attention given to building facades which face the surrounding landscape to avoid any adverse landscape effect on the AONB. The use of close boarded fencing in areas visible from the PRoW should be avoided, and any external lighting, if required, should be minimal. Noise levels should not increase above the existing noise levels within adjacent areas. The policy requires that the design and layout of the development will be further informed by a Landscape and Visual Impact Assessment (LVIA).
  - d) The site is within 1 km of at least one SSSI and there is the potential for Great Crested Newts in the area. Therefore, the policy requires an EclA to ensure

any designated sites and/or protected habitats and/or species are not adversely affected. The development is also required to be informed by a Tree Survey due to the presence of TPOs on the site.

- e) The site is located to the east of Hill Place Farm and Deerbourne Grade II listed building. Consideration would need to be given to their setting, and although any impact is expected to be minimal given intervening development, the policy requires that the development will be informed by a Heritage Impact Assessment (HIA). An archaeological desk based assessment is required as a minimum, with field evaluation if required to assess the historic potential of the site.
- f) The policy contains a number of criteria which will seek to mitigate air, water, noise and light pollution. External lighting will need to be considered in the design and, if required, should be minimal and avoid edge of site locations, as set out in point v) of criterion d). The policy also requires at point vi) of criterion d) that noise levels should not increase above the existing noise levels within adjacent areas. A Flood Risk Assessment, with appropriate mitigation including SuDS is required to inform the development. SuDS can filter pollutants, and the policy also requires that the development design will be designed for climate resilience, including maximising the efficient use of sustainable technologies. The policy does not specifically include a criterion relating to air pollution, however this would be considered under policy DM5 which seeks to ensure that development will not lead to adverse effects on pollution of the environment, and contains criteria regarding air, water, noise and light pollution. In addition, the Council are working with the Environment Agency (EA) to prepare a Statement of Common Ground (SoCG) to address concerns raised through their Regulation 19 representations. Once the SoCG is agreed, a modification will be proposed to include an additional criterion in this policy to consider the likelihood and extent of land contamination and where necessary ensure the provision of appropriate remediation measures.
- g) To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all site allocation policies, proposes a main modification to the policy as criterion m) as follows:

m) 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'

**ESA6 Land adjacent to Padworth IWMF, Padworth Lane, Padworth**

1.43. Yes, the Council considers that with the modification proposed below, policy ESA6 will be effective in ensuring that a scheme is developed in a satisfactory manner, and commentary in relation to each point is noted below:

- a) The site has been proposed for allocation for B2 and/or B8 uses which are complementary to the employment offering already present at the nearby Beenham Industrial Estate. The site a former oil terminal and lies adjacent to a modern waste management facility. The use is also suitable for the location, being on the A4 which is a Freight Route. In terms of the scale of the proposed development, all sites promoted for employment uses were assessed consistently through the HELAA process. The floorspace figures have been calculated using standard plot ratios, applied to the developable area of each site. Details are set out in the HELAA Report (SIT4a).
- b) Access will be provided from Padworth Lane and this has been informed by the Council's Highways and Transport team. A Transport Assessment is required which will provide measures to mitigate the impact of the development on the local road network and which will also consider the impact on Padworth Lane, the bridge and traffic lights, the junction with the A4, and the A340/A4 roundabout. The site is in a sustainable location benefitting from public transport routes, and the A4 is relatively wide in this location potentially enabling cycling. Whilst a Travel Plan is not required by the policy the location makes the option of travelling without a private car more attractive to employees, and should it be considered a Travel Plan is necessary this can be sought under policy SP23.
- c) Considering the site is a brownfield site the policy requires the design and layout to be in accordance with SP7 and informed by a Landscape and Visual Impact Assessment, taking into account the character and appearance of surrounding development.
- d) BBOWT has advised to the Regulation 18 consultation that the site is within 1 km of at least one SSSI. There is also the potential for Great Crested Newts in the area. Therefore, the policy requires an EclA to ensure any designated sites and/or protected habitats and/or species are not adversely affected.
- e) The Council has agreed a Statement of Common Ground with Historic England ([EXAM 13](#)) and to ensure consistency across all the site allocation policies, proposes a minor modification to the policy as follows:
  - “g) 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.”.
- f) The policy contains a number of criteria which will seek to mitigate air, water, noise and light pollution. A Flood Risk Assessment, with appropriate mitigation including SuDS is required to inform the development. SuDS can filter pollutants, and the policy also requires that the development design will

be designed for climate resilience, including maximising the efficient use of sustainable technologies. Criterion h) requires that development will be informed by a desk based assessment detailing the likelihood and extent of land contamination, with potential further investigation and monitoring, and remediation. The policy does not specifically include a criterion relating to air pollution, however this would be considered under policy DM5 which seeks to ensure that development will not lead to adverse effects on pollution of the environment, and contains criteria regarding air, water, noise and light pollution. In addition, the Council are working with the Environment Agency (EA) to prepare a Statement of Common Ground (SoCG) to address concerns raised through their Regulation 19 representations.

- g) To ensure that adequate and appropriate infrastructure for water supply and wastewater, are provided both on and off site, an integrated water supply and drainage strategy must be provided in advance of development. The Council has agreed a Statement of Common Ground with Thames Water ([EXAM 14](#)) and through this, to ensure consistency across all site allocation policies, proposes a main modification to the policy as criterion l) as follows:

l) 'An integrated water supply and drainage strategy will be provided in advance of development to ensure the provision of adequate and appropriate infrastructure for water supply and waste water, both on and off site. Such a strategy should include details of the phasing of development to consider likely upgrades needed for the water supply network infrastructure. Development will be occupied in line with this strategy.'

**Q11.6. Are all sites that are available and suitable for industrial and/or storage and distribution development allocated in the Plan?**

- 1.44. Yes, all the sites that are available and suitable for industrial and/or storage and distribution development are allocated in the Plan.
- 1.45. The Site Selection Methodology Paper ([SIT1](#)) outlines the process the Council took to assessing sites promoted through the plan making process. All sites submitted were assessed through the Housing and Economic Land Availability Assessment (HELAA) ([SIT4a-SIT4e](#)). Through the HELAA assessments it has been possible to determine those sites which are suitable, achievable and available, and thus have potential for development. A significant amount of information informs the assessment of suitability, involving service providers from across the Council and external organisations and consultees. Sites have been assessed using the latest information available at the time of the assessment.
- 1.46. In assessing sites promoted for employment uses, the ELR ([EMP3](#) and [EMP4](#)) assessed the sites from a property market perspective, to determine the likely attractiveness of each site to potential developers and future occupiers for office and/or industrial use. The recommendations of which are

set out within Chapter 6 of the ELR Addendum 2022 ([EMP4](#)) and its associated Appendix C.

- 1.47. The SA/SEA ([CS3a](#) – [CD3k](#)) then considered those sites which the HELAA concluded were deliverable or potentially developable. SA/SEA utilised the available information and appraised the sustainability of the site to ensure the promotion of sustainable development within the LPR, through the integration of environmental, social and economic considerations. The appraisal of the employment site allocations is set out in Section 5 of [CD3a](#).
- 1.48. Of the 16 sites appraised for employment uses through the SA/SEA, Table 55 sets out that six are considered available and suitable. These six sites have been proposed for allocation within the LPR (HELAA ref: BEEN3/BEEN5, BEEN10, LAM6, LAM10, MID5 and PAD4).
- 1.49. Eight of the sites appraised, although available, are not considered suitable for allocation due to their location within the Detailed Emergency Planning Zone (DEPZ) for the AWE Burghfield and AWE Aldermaston sites (HELAA ref: ALD3, ALD6, ALD8, ALD10, BRIM3, BUR12, BUR14 and SM8) and the risk factors related to allocating sites within this zone from an Emergency Planning perspective.
- 1.50. The Council has the responsibility under the Radiation (Emergency Preparedness and Public Information) Regulation (REPPiR) 2019 to ensure compliance with this legislation, including the determination of the DEPZ (Regulation 8), the preparation of the AWE Off-Site Emergency Plan (OSEP) under Regulation 11, the review and testing of emergency plans (Regulation 12) and the provision of information to the community within the DEPZ (Regulation 21). The OSEP must be adequate such that as far as is reasonably practicable, should there be a 'radiation emergency', it can be put into effect without delay, the necessary information, instruction and training have been provided and the necessary equipment for restricting exposure are available and any other underpinning capabilities required to implement the plan are in place and readily available (Reg 11). In so doing this is taking into account the definition of a radiation emergency as a 'non-routine or event arising from work with ionising radiation that necessitates prompt action to mitigate the serious consequences that might arise from the release of radiation including consequences a. of a hazard resulting from the situation or event; b. of a perceived risk arising from such a hazard; or c to any one or more of (i) human life, (ii) health and safety, (iii) quality of life, (iv) property (v) the environment'. (REPPiR 19 Reg 2(1)).
- 1.51. Taking into account the requirements of the REPPiR legislation placed upon the Council and the need to be able to respond as detailed within the OSEP, further development, individually and cumulatively, within the DEPZ must be considered against the adequacy of the OSEP and the assessed risk and serious consequences to the health and wellbeing of the existing and future populations within this zone. Paragraph 97 b) outlines that sites required for operational defence and security purposes should not be affected adversely by the impact of other development in the area. As such, the Council has

taken a proportionate approach to not allocate within the DEPZ at this time. It should be noted that the DEPZ is reviewed and re-determined every 3 years, unless there is a change in operations on the AWE sites and/or the local authority considers there is a change in the local area which necessitates a re-determination. Therefore, over the plan period the approach to allocations and the ability to bring forward supply in this location may change, the Council will continue to work together with its partners and neighbouring authorities, to review the approach within the DEPZ at the appropriate opportunities.

- 1.52. Two further sites, not within the DEPZ, were also considered not suitable for allocation. A site in Chieveley (HELAA ref: CHI9), which is a small site in the North Wessex Downs National Landscape (AONB), and due to its isolated location and potential landscape impact, is not considered suitable. The ELR assessment of the site from a market perspective concluded that the site is not in a market area attractive to office occupiers, its remoteness and size could make viability challenging, and it has poor road network connections, which is unattractive to the industrial market. The other site is in existing employment use for small scale independents, located off Lower Way in Thatcham (HELAA ref: THA24) and identified as sitting within a settlement gap. The ELR assessment of the site from a market perspective concluded that the site would not be suitable for office space due to its location and size which would challenge viability. Whilst the site would be better suited for light industrial uses, demand would be small scale, flood risk and the need to maintain a landscape buffer would limit the developable area and viability would be challenging.
- 1.53. As set out in the supporting text to policy SP20 the Council recognises the Plan is unable to make provision to meet the District's industrial requirements in full over the plan period. The Employment Background Paper ([EMP5](#)) highlights in Table 3 that the LPR allocates sufficient land to meet 14.6ha of the 23ha of industrial land required, amounting 58,400sqm of floorspace. Given the shortfall in the later part of the plan period, the Council has committed to reassess this matter again through a review in the first five years of the Plan.

#### **M11.4 Office development (policies SP20, SP22 and DM32)**

<b>Q11.7. Are there available sites that are suitable for offices that should be allocated for that type of development in the Plan?</b>
--

- 1.54. No, the Council does not consider there to be any available sites that are suitable for office development that should be allocated within the Plan.
- 1.55. The Site Selection Methodology Paper ([SIT1](#)) outlines the process the Council took to assessing sites promoted through the plan making process. All sites submitted were assessed through the Housing and Economic Land Availability Assessment (HELAA) ([SIT4a-SIT4e](#)). Through the HELAA assessments it has been possible to determine those sites which are suitable, achievable and available, and thus have potential for development. A

significant amount of information informs the assessment of suitability, involving service providers from across the Council and external organisations and consultees. Sites have been assessed using the latest information available at the time of the assessment.

- 1.56. In assessing sites promoted for employment uses, the ELR ([EMP3](#) and [EMP4](#)) assessed the sites from a property market perspective, to determine the likely attractiveness of each site to potential developers and future occupiers for office and/or industrial use. The recommendations of which are set out within Chapter 6 of the ELR Addendum 2022 ([EMP4](#)) and its associated Appendix C.
- 1.57. The SA/SEA ([CS3a](#) – [CD3k](#)) then considered those sites which the HELAA concluded were deliverable or potentially developable. SA/SEA utilised the available information and appraises the sustainability of the site to ensure the promotion of sustainable development within the LPR, through the integration of environmental, social and economic considerations. The appraisal of the employment site allocations is set out in Section 5.
- 1.58. Of the 16 sites appraised through the SA/SEA only one site is considered to be available and has the potential to deliver office development: BUR12 Land at Green Park, Kirton's Farm Road, Reading. One other site was promoted for industrial and/or office use, it is available and is considered to have potential for either use, or a mix of both uses, although the ELR recommends the site is more suited to light industrial uses from a property market perspective given its location: ALD6 Land off Benyon Road, Easter Park.
- 1.59. However, these sites sit within the Detailed Emergency Planning Zone (DEPZ) for the AWE Burghfield site. As outlined above, sites within the DEPZ for both AWE Aldermaston and AWE Burghfield have been ruled out for allocation within the LPR, and as such the sites are not considered suitable to be allocated for office development at this time.
- 1.60. As set out in the supporting text to policy SP20 the Council recognises the Plan is unable to make provision to meet the District's office requirements over the plan period. Since the Covid 19 pandemic began the economy has experienced a weakened office market, with falling demand. The Council has positively sought opportunities to meet the office requirement for the District by undertaking Call for Sites and through the Duty to Cooperate process, but a lack of suitable supply remains as confidence in the market is weak, resulting in a diminished appetite for investment. This, coupled with the various constraints across the District are the principal reasons for the lack of supply. However, despite the current slowdown in the office market there remains a forecasted demand for office space over the long term. Given the lack of supply, the Council has, through the LPR, sought to promote the supply of offices and safeguard existing offices to ensure delivery can be achieved should the market demand for offices strengthen over the longer term. The Council has committed to reassess this matter again through a review in the first five years of the Plan.

**Q11.8. Is the approach to considering proposals for office development set out in policies SP20, SP22 and DM32 consistent with national policy or otherwise justified?**

- 1.61. The Council refers to its responses to PQ43 (in [EXAM2](#) page 95) to the Inspector's Preliminary Questions ([IN2](#)) regarding the approach to considering proposals for office development.
- 1.62. The LPR continues to apply sequential approach to office development for proposals outside a town centre as required by national policy, but extends this to also include DEAs. The Council's response to PQ43 as set out above explains the approach and why the Council considers the approach taken to be justified.

**M11.5 Town centres and retail parks (policies SP22 and DM34)**

**Q11.9. Is the hierarchy of town centres identified in policy SP22 justified?**

- 1.63. Yes, the hierarchy of town centres set out in Policy SP22 is justified. The hierarchy of town centres is a way of categorising the District's centres to recognise their different role, and is required by the NPPF ([NAT1](#)).
- 1.64. As outlined in the Retail Background Paper ([RTC2](#)) at paragraph 7.3 the policy builds on the approach set out in the Core Strategy ([SD1](#)) in terms of identifying the hierarchy of centres. The Council used the existing hierarchy within the Core Strategy as the starting point and undertook a review considering whether the role attributed to each centre in the Core Strategy remains relevant under the LPR. The position of each centre within the hierarchy reflects the scale and character of that centre, as well as its role and function within the community they serve mainly based upon their retail, commercial, and leisure offer. Information gathered from the settlement hierarchy review along with information collated whilst on site within each centre reviewing the commercial centre boundaries and primary shopping areas was used to make an assessment of the existing centres. The review concluded that although changes in the offering within the centres have taken place, to varying degrees, the hierarchy of centres did not need to change, and remains the same as that within the Core Strategy.
- 1.65. The Retail Background Paper ([RTC2](#)) sets out details regarding the hierarchy of centres at paragraphs 7.4, 7.5 and 7.6 and is summarised below.
- 1.66. At the top of the hierarchy Newbury is identified as a major town centre. Newbury is the main administrative centre within the District and boasts a traditional market town heritage. It hosts the largest town centre, offering a good range of retail, commercial and leisure activity. The development of Parkway, the comparison goods and retail offering, with independents, the cultural and leisure offerings, including green spaces, and its accessibility, all



contribute to Newbury being a major town centre. Many events are held in Parkway and the town centre, some events hosted by the Corn Exchange and others by the Newbury Business Improvement District (BID) through their 'Visit Newbury' brand. Events include seasonal events, film and sport screenings, events for children and families, and art installations. The Kennet Centre benefits from a Vue Cinema and a cluster of restaurants, as well as retail units.

- 1.67. Thatcham and Hungerford are identified as town centres. Both towns have distinct and functional centres, providing essential services to their residents, and choice of main town centre uses and convenience goods provision. Thatcham, despite being identified as an urban area within the settlement hierarchy, has a comparatively small town centre. It faces inevitable competition from Newbury given its close proximity, making it difficult to attract large national retailers. However, there is scope to widen and improve the offering within the town, in particular with local independent businesses, to allow it to continue to serve the local community. Hungerford is distinct for its antiques trade and as such attracts a large number of visitors. This means the town supports more shops, cafes and restaurants that would otherwise be the case for a town of its size.
- 1.68. Lambourn, Pangbourne and Theale are identified as district centres. These are smaller centres than Newbury, Thatcham and Hungerford with more limited provision than such centres, but all serve their community and the communities of surrounding villages with day-to-day shopping needs as well as some leisure offerings.
- 1.69. The rural service centres of Burghfield Common and Mortimer were considered for inclusion within the hierarchy of centres but were discounted due to the sporadic nature and scale of the offering across the settlements.
- 1.70. The Council's preparation of town centre strategies/masterplans for Newbury, Thatcham and Hungerford further reinforces the role and function of the top three centres within the hierarchy, each with a dedicated strategy taking a positive approach to their growth, management and adaptation, ensuring they continue to serve the local communities within West Berkshire.

**Q11.10. Are the boundaries to each town centre and primary shopping area defined on the policies map justified?**

- 1.71. Yes, the boundaries to each town centre and primary shopping area defined on the policies map are justified. The NPPF ([NAT1](#)), at Chapter 7, requires planning policies to define the extent of town centres and primary shopping areas. These are areas predominately occupied by main town centre uses within or adjacent to primary shopping areas.
- 1.72. The Retail Background Paper ([RTC2](#)) at Sections 8 and 9 explains the Council's approach and recommendations, and is summarised below. As with the hierarchy of centres, the review of town centre commercial areas and

primary shopping areas builds on those identified on the Core Strategy Policies Map.

- 1.73. The town centre commercial areas were reviewed by using the existing boundaries as the baseline. As part of the Employment Land Review (ELR) ([EMP3](#) and [EMP4](#)) as assessment of the town centre commercial areas was provided and this work forms the starting point for the review. Officers also undertook site visits to survey the uses within and at the edge of the existing boundaries in particular to consider if amendments were required to reflect development gains and/or losses. A desk top assessment of planning commitments was also undertaken to verify information obtained on site.
- 1.74. In reviewing the primary shopping areas, the existing primary shopping frontages were used as the baseline and site visits were undertaken to review the different types and mixes of uses along the existing defined frontages within each centre. A desk top assessment of each centre was also undertaken to verify the information obtained on site and to determine retail clusters and the most appropriate primary shopping areas.
- 1.75. Using the evidence gathered, the Retail Background Paper ([RTC2](#)) provides a series of maps identifying any proposed amendments to the existing town centre commercial areas and primary shopping areas, along with commentary of the proposed recommendations at Sections 8 and 9. A summary of the recommendations is outlined below for each centre.

#### Town Centre Commercial Areas

- 1.76. The NPPF defines the town centre as an *'Area defined on the local authority's policies map, including the primary shopping area and areas predominantly occupied by main town centre uses within or adjacent to the primary shopping area...'*. As outlined above, the starting point for the review was the existing town centre commercial areas defined on the Core Strategy Policies Map. The following text sets out the proposed changes to the town centre commercial areas following the review.
- 1.77. In Newbury, the town centre commercial area is proposed to be reduced. To the south, in Pound Street, the area is disconnected from the town, with the vacant builder's yard (now subject of a planning application for residential use) is not a town centre use. At West Street the conversion of offices to residential units removes town centre uses from the centre. To the north of the town Waitrose and Microfocus are disconnected from the centre due to intervening residential development. London Road East, east of Aldi, an office building has been converted to residential, and therefore are proposed to be removed. An increase is proposed to the south side of Northcroft Lane as these units accommodate offices.
- 1.78. In Thatcham, the main alteration is to remove an area of land which has been developed for residential purposes, on the corner of Station Road and The Moors. It is not proposed to expand the town centre commercial area to

include smaller pockets of existing town centre uses as these are disconnected from the town centre, including for example the shops at Crown Mead.

- 1.79. In Hungerford, the majority of the town centre commercial area continues to fulfil its original purpose. In Charnham Street there is a row of town centre uses that ends with motor sales/repair garages, which are proposed for inclusion. The Tesco superstore is also proposed for inclusion given its dominance in the convenience goods market. There are town centre uses to the south of the High Street, though these are more sporadic and not recommended to be included.
- 1.80. In Lambourn, a new town centre commercial area is proposed, as one was not previously designated in the Core Strategy. There is a cluster of town centre commercial uses on the High Street and Market Place. The main town centre uses include retail, café, takeaway, pubs, hotel, community facilities and some offices. There is an office space in Crowle Road but due to the separation created by residential properties it is considered that this should not be located in the town centre commercial area. Similarly, the pharmacy, pub and betting shop on the Broadway are disconnected, and are not proposed for placement in the commercial area.
- 1.81. In Pangbourne, the town centre commercial area is proposed to be increased to the east side to accommodate a row of buildings in retail use. It is proposed to reduce the area of Pangbourne Place and land south of Reading Road as these include residential properties.
- 1.82. In Theale, the town centre commercial area to the south of the High Street is removed as there has been residential development. Otherwise, the commercial area as previously proposed still serves its original purpose.

### Primary Shopping Areas

- 1.83. The NPPF defines the primary shopping area as a '*Defined area where retail development is concentrated*'. The starting point for the review was the existing frontages defined on the Core Strategy Policies Map. The following text sets out the proposed changes to the primary shopping areas following the review.
- 1.84. Newbury's town centre has changed since the Core Strategy, with the development of Parkway at the northern end of the town. It is proposed to extend the primary shopping area to include this new shopping location, as most units are Class E uses. Reductions are proposed in the Kennet Centre, and to the south side of the Kennet Centre where there is a cluster of restaurants and leisure uses. The Arcade is removed (between Market Place and Bartholomew Street) as there is now a concentration of non-retail uses.
- 1.85. In Thatcham, it is proposed to extend the primary shopping area to include the Kingsland Centre. This is a key visitor area, as it includes Waitrose and a

number of smaller retail units, with access to a central car park. Extensions are also proposed to the south side of the Broadway, on both the east and west sides, to the north of the Broadway, and to the north side of the High Street, recognising the retail offerings in these locations.

- 1.86. It is proposed to increase the primary shopping area in Hungerford to the south side of the High Street (land south of Park Street) recognising the retail offerings. There are small clusters of retail within the High Street and at Bridge Street, not currently within the primary shopping frontage. These are more sporadic in location, and do not read with the main core of the town centre. It was therefore considered appropriate not to change the primary shopping area in these locations.
- 1.87. A new primary shopping area is proposed for Lambourn. There is a small cluster of retail uses along the High Street, and it is considered appropriate to designate an area in this location. Lambourn serves a particular catchment of the population in the north-west of the District, supporting many outlying villages as well as responding to demand from local businesses, including the extensive equestrian sector.
- 1.88. The primary shopping area in Pangbourne was considered to still be appropriate, reflecting the town centre uses in place. It is proposed to increase the extent of the area as retail units are clustered to the north and south of the High Street.
- 1.89. In Theale, the primary shopping area is proposed to be slightly reduced to account for a new residential development on the south side of the High Street at Angel Court breaking the continuity of the retail offering.

**Q11.11. Is the approach in policy SP22 to considering development proposals within the town centres and primary shopping areas justified and consistent with national policy?**

- 1.90. Yes, the approach within Policy SP22 to considering development proposals within the town centres and primary shopping areas is justified and consistent with national policy. The NPPF ([NAT1](#)), at Chapter 7, states that 'planning policies should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation'.
- 1.91. Through defining a hierarchy of town centres and defining the extent of town centres and primary shopping areas this concentrates those retail and other main town centre uses into particular areas which, aside from Class E uses, are also locations for public transport, businesses, walking/cycling routes, and increasingly residential. The policy is flexible in primarily supporting retail uses and recognising that Class E uses include uses such as cafes which contribute to the high street and adapt to changing consumer behaviour.

- 1.92. As set out in the supporting text to policy SP22 at paragraph 7.34, the policy directs development proposals for main town centre uses to the centres defined in the hierarchy in line with the sequential test set out in national policy. The policy also specifically outlines support for redevelopment/regeneration proposals within town centres that provide a net additional contribution to office space to assist in meeting identified needs for offices over the plan period. The Council's response to PQ43 (in [EXAM2](#) page 95) to the Inspector's Preliminary Questions ([IN2](#)) sets out the approach to offices within Designated Employment Areas.
- 1.93. The policy recognises that uses other than main town centre uses may be appropriate within town centres, for example residential development can play an important role in ensuring the vitality of centres, and the policy sets out criteria to ensure the development proposals within town or district centres are appropriate, including the consideration of the scale and character of such proposals, impact on the local highway network and importantly the contribution such proposals would make to the vitality and viability of the centre.
- 1.94. The supporting text to policy SP22 makes clear that the policy encourages retail uses to be the focus of the primary shopping areas. However, changes in policy at the national level allows for much greater flexibility in permitted development rights across Use Class E, within which retail sits, and the policy is flexible enough to allow for this. As outlined in paragraph 7.31 of the LPR ([CD1](#)) the retail industry has faced a number of challenges in recent years, and the effects of which continue to evolve, and are having a significant impact on consumer shopping behaviour. In recognition of this the policy seeks to manage the growth of the District's centres, while also allowing them to adapt to the needs of the market and changing shopping trends. As such, the policy allows for some non-Class E uses within the defined primary shopping areas only where the proposals would not result in a disproportionate concentration of non-Class E units that would be harmful to the vitality of that centre.
- 1.95. As highlighted in the supporting text (paragraph 7.39) to the policy, town centre strategies have been prepared for Newbury ([EXAM8](#)), Thatcham ([EXAM9](#)), and Hungerford ([EXAM10](#)). Such strategies help to define the strengths and weaknesses of the town centres, devising a series of actions to enhance the centres. This aids in supporting the management, adaptation, and growth of the town centres, and are material considerations in decision making.

**Q11.12. Is the approach in policy DM34 to considering development proposals in the three defined retail parks justified and consistent with national policy?**

- 1.96. Yes, the approach in policy DM34 is justified and consistent with national policy. The NPPF ([NAT1](#)) at Chapter 7 seeks to ensure the vitality of town centres. The policy builds on policy SHOP3 in the West Berkshire District Local Plan 1991-2006 (Saved Policies 2007) ([SD3](#)). The three retail parks

identified in policy DM34 are well established, and perform well, offering a different type and size of unit to that within the District's existing centres, with often a mix of Class E, retail warehousing and leisure uses. As outlined in the Western Berkshire Retail and Commercial Leisure Study 2016 ([RTC1a](#)) retail warehousing in particular perform well in these locations, and are in accessible locations. Food stores have been added to both retail parks in Newbury.

- 1.97. It is recognised that the retail evidence pre-dates the effects of the COVID-19 pandemic, and the UK's exit from the EU. The high street is changing as behaviour has been shifting to online shopping and 'click and collect'. The Council is committed to a review of the retail evidence in the first five years of the Plan, allowing the industry time to adjust and adapt to the recent challenges facing the high street. In the meantime, the Council continues to promote the District's town centres, maintaining and enhancing their vitality and viability through policy SP22.
- 1.98. The intention of policy DM34 is to safeguard existing well established and accessible retail parks for retail and leisure uses, providing diversity to the local economy given the type and size of units offered in these locations. In line with national policy, proposals in these areas would be subject to the sequential test where appropriate, and required to demonstrate that they would not have a significant detrimental impact either individually, or cumulatively with other such proposals on the vitality and viability of Newbury town centre or other nearby centres.

### **M11.6 Economic development in the countryside (policies DM35, DM36 and DM38)**

**Q11.13. Are policies DM35, DM36 and DM38 justified and consistent with national policy and will they be effective in securing sustainable economic development in the countryside?**

- 1.99. The NPPF ([NAT1](#)) supports a prosperous rural economy. Paragraphs 84 and 85 of the NPPF sets out how planning policies should seek to achieve this. Policies DM35, DM36 and DM38 are considered justified and consistent with the NPPF.

### **DM35 Sustaining a Prosperous Rural Economy**

- 1.100. The Employment Background Paper (January 2023) ([EMP5](#)) at paragraph 90 explains that the policy supports proposals for economic development. The LPR and its associated evidence base recognises that the District hosts a number of small and medium sized enterprises in its rural areas which are vital to the rural economy, providing local job opportunities and diversity. Alongside this a key aim of the West Berkshire Economic Development Strategy ([EMP1](#)) is to ensure the District is attractive for businesses. The policy encourages development proposals that contribute to sustaining a

prosperous rural economy, through the conversion of existing buildings and well-designed new buildings, and seeks to ensure businesses can make a long-term contribution to the rural economy.

- 1.101. The support for a prosperous rural economy is balanced against the need to conserve and enhance the character of the countryside, particularly the North Wessex Downs National Landscape (AONB). The West Berkshire Landscape Character Assessment (2019) ([LAN1](#)) supports this approach, as rural areas are more at risk from piecemeal development. In turn this is consistent with the NPPF which at Chapter 12 seeks well designed places.
- 1.102. The AONB is a living and working landscape, being one of the District's biggest assets. The policy supports appropriate proposals that contribute to strengthening the rural economy and seeks to foster sustainable economic growth in the countryside without detriment to the environment. Through the criteria listed within Policy DM35 the policy will be effective in securing sustainable economic development in the countryside. As set out in paragraph 12.18 of the supporting text to Policy DM35 the criteria are designed to safeguard against functionally, visually, or environmentally inappropriate development in the countryside.
- 1.103. Access to services and public transport is challenging in many parts of the rural area, and as recognised in paragraph 85 of the NPPF sites to meet local business needs may have to be found adjacent or beyond existing settlements, and in locations not well served by public transport. Thus, criterion h) seeks to ensure that development proposals would be appropriate for the local highway network.
- 1.104. The Council considers policy DM35 to be justified and consistent with national policy, and that it will be effective in securing sustainable economic development in the countryside.

### **DM36 Farm Diversification**

- 1.105. Policy DM36 is justified and consistent with national policy, which states at criterion b) of paragraph 84 of the NPPF ([NAT1](#)) that planning policies should enable 'the development of and diversification of agricultural and other land-based rural businesses'.
- 1.106. The policy is positively worded to ensure that farm diversification is supported, whilst seeking to ensure that development is appropriate. West Berkshire includes significant areas of privately owned and farmed landscapes with rural estates and farms, playing a vital role in sustaining the rural economy and contributing to its diversity. As outlined in paragraph 12.27 of the supporting text to policy DM36 ([CD1](#)), the purpose of the policy is to continue to support the long-term viability of agricultural businesses. In supporting farm diversification, the criteria within the policy seek to ensure proposals are appropriate and the diversification activities remain subsidiary to the agricultural operation in terms of physical scale and environmental impact.

The criteria also seek to limit the impact on the character of the area and ensure proposals do not harm the significance of heritage assets, do not have an adverse impact on local amenity, and do not have an inappropriate impact on local road networks. In protecting the character of the area, the policy seeks to reduce the number of buildings on site, and therefore prefers the re-use or replacement of existing buildings, and seeks to ensure that buildings have not been disposed of for residential use which could have been suitable.

- 1.107. The policy encourages larger businesses in particular to prepare ‘whole farm or estate plans’ which can identify opportunities in holistic ways, ultimately leading to better planning of farms and/or estates.
- 1.108. The Council considers policy DM36 to be justified and consistent with national policy, and that it will be effective in securing sustainable economic development in the countryside.

### **DM38 Development on Existing Educational and Institutional Sites in the Countryside**

- 1.109. The District has a number of educational and institutional sites located within rural areas. As well as providing education and other services (such as health) they contribute to the rural economy and to local communities in a more limited way (e.g. through leisure facilities). Indirectly, the policy supports a prosperous rural economy, and outlines the circumstances under which permission would be given for projects for educational and institutional sites in the countryside. It is recognised that educational establishments in particular are important employers and facilities are shared with the wider community, such as leisure facilities. Certain establishments are also wedding venues. However, the intention of the policy is to support the primary functions of the educational and institutional establishments.
- 1.110. The policy is positively worded, and updates policy ENV27 of the West Berkshire District Local Plan 1991-2006 Saved Policies 2007 ([SD3](#)). The policy acknowledges that the operational needs of educational and institutional sites can change over time, and strikes a balance between the restriction on development in the countryside and the operational requirements of such establishments, whilst considering the impact on landscape and local infrastructure. The policy responds to paragraph 95 of the NPPF ([NAT1](#)), which outlines the need for local planning authorities to take a ‘proactive, positive and collaborative approach’ to ensure a sufficient choice of school places and widen the choice in education.
- 1.111. The Council considers policy DM36 to be justified and consistent with national policy, and that it will be effective in securing sustainable economic development in the countryside.



## **M11.7 Equestrian development and horseracing industry (policy DM37)**

<p><b>Q11.14. Is policy DM37 justified and consistent with national policy and will it be effective in ensuring that development related to equestrian facilities, the horseracing industry, and Newbury Racecourse is sustainable?</b></p>
---

- 1.112. Yes, the Council considers the policy is justified and consistent with national policy. The District is known for its links with the equestrian and horseracing industry, with Newbury Racecourse located on the edge of Newbury. The racehorse breeding and training industry is a particularly important part of the local rural economy of the District.
- 1.113. The policy effectively combines and updates policies CS12 in the adopted Core Strategy ([SD1](#)) and policy ENV29 in the adopted West Berkshire District Local Plan 1991 - 2006 (Saved Policies) ([SD3](#)).
- 1.114. Paragraph 84 of the NPPF ([NAT1](#)) supports a prosperous rural economy through the development and diversification of agricultural and other land-based rural businesses; rural tourism and leisure developments which respect the character of the countryside; and the retention and development of accessible local services and sports venues which respect the character of the countryside.
- 1.115. Paragraph 85, however highlights the importance of ensuring that development in the countryside is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport).
- 1.116. In accordance with NPPF paragraphs 84-85 the Council wishes to retain and support the expansion of the horseracing industry. Policy DM37 therefore takes account of national policy and will support the provision of new stabling or breeding facilities together with residential accommodation in the countryside where financial viability is demonstrated together with supporting evidence to show the new facility has sufficient need to require a worker to be permanently living on the site in the long term with a restricted occupancy condition. The policy aims to allow for the sensitive development and growth of the horseracing industry. The policy criteria are designed to conserve and enhance environmental quality and to conserve and enhance the character of the countryside.
- 1.117. The policy is therefore considered to be effective and will strengthen the rural economy of West Berkshire whilst increasing opportunities for people to enjoy the countryside in a sustainable manner.

### **M11.8 Theale rail-road transfer site (policy DM43)**

**Q11.15. (a) Is policy DM43 consistent with policies in the West Berkshire Minerals and Waste Local Plan 2022-2037? (b) Does policy DM43 provide a clear and unambiguous approach to the types of development that will be permitted?**

- 1.118. a) Policy DM43 is a safeguarding policy, and its aim is to safeguard the site as defined on the Policies Map for use as those industries requiring a rail - road transfer facility.
- 1.119. Currently, the site is primarily an aggregates terminal and as such the West Berkshire Minerals and Waste Local Plan 2022-2037 (M&WLP), through policy 9, safeguards the site to ensure the supply of minerals and the continued export of minerals from the District by road.
- 1.120. Policy 9 of the M&WLP safeguards sites from mineral sterilisation, and in the case of this site, safeguards Minerals Infrastructure against development that would unnecessarily prevent or prejudice the operation of the infrastructure. However, the policy does include provision for non-mineral development in circumstances listed within the policy. Policy DM43 of the LPR therefore complements policy 9 of the M&WLP and ensures that should non-mineral development be considered acceptable under the provisions of policy 9 of the M&WLP, the site continues to remain in use as a rail – road transfer site for other industries requiring such a facility.
- 1.121. To make this approach clear and to ensure consistency between policy DM43 and the policies within the West Berkshire Minerals and Waste Local Plan 2022 – 2037, thereby improving the effectiveness of the policy, the Council proposes the following main modification to the policy and supporting text:

#### **“Policy DM43 Theale Rail – Road Transfer Site**

The site at Wigmore Lane in Theale, as defined on the Policies Map, shall be safeguarded as a rail – road transfer facility. ~~site at Theale is reserved solely for those industries which require a rail-road transfer facility and access to the highway network.~~

Redevelopment for any uses not expressly for this purpose of the site, in part or in whole, for uses that would compromise the operation of this facility will not be permitted.

#### **Supporting text**

12.100 The rail - road transfer site at Wigmore Lane, Theale, is an important infrastructure facility within the District allowing for the transfer of goods from rail to road, and this policy seeks to safeguard the site, as defined on the Policies Map, as a rail – road transfer facility.

12.101 The facility is primarily an aggregates terminal, and the West Berkshire Minerals and Waste Local Plan 2022-2037 safeguards the site to ensure the supply of minerals and the continued export of minerals from the District by road. Proposals for Any non-mineral and waste development on the site would need to comply with the exceptions set out in Policy 9 of the West Berkshire Minerals and Waste Local Plan 2022 - 2037. Should the exceptions be deemed to apply, Policy DM43 will ensure the site continues to remain in use as a rail – road transfer facility, allowing the continued movement of freight from rail to road for other industries requiring such a facility, including for example the transfer of consumer goods.

12.102 Nonetheless, The movement of freight by rail is vital to the local economy and plays a significant role in reducing congestion and carbon emissions. Many industries rely on rail freight for the movement of goods, and with the drive to reduce carbon emissions globally it is expected that demand for rail freight will continue to grow. transport of consumer goods by rail continues to be important for the local economy and Theale is the only location which offers rail - road transfer facilities in the area and which may have the potential to support rail freight growth. †The site should be protected to ensure the infrastructure exists to allow for the transfer of rail freight for those industries which require a rail-road transfer facility and access to the highway network.

12.103 The extent of the rail-road transfer site is defined on the Policies Map.”

- 1.122. b) The Council considers that policy DM43 could be clearer. However, with the proposed modifications set out in response to part (a) above, the Council considers that the policy would provide a clear and unambiguous approach to the types of development that would be permitted.
- 1.123. The movement of freight by rail is vital to the local economy and plays a significant role in reducing congestion and carbon emissions, and this site provides an important infrastructure facility within West Berkshire allowing for the transfer of goods from rail to road. Many industries rely on rail freight for the movement of goods, including for example the transport of consumer goods, and with the drive to reduce carbon emissions globally it is expected that demand for rail freight will continue to grow. As such, the proposed modifications make clear that the policy is safeguarding the site as a rail – road transfer facility to ensure the infrastructure exists to allow for the transfer of rail freight to the highway network. To make the policy more effective and remove any ambiguity, reference to the industries which may make use of the facility is proposed to be removed from the policy wording.
- 1.124. A Statement of Common Ground ([EXAM17](#)) has been prepared between West Berkshire Council and Network Rail, Englefield Estate and Bethonforth in relation to policy DM43 Theale Rail – Road Transfer Site and in response to their representations made to the Regulation 19 Proposed Submission West Berkshire Local Plan Review 2022-2039 ([CD1](#)).