

## **West Berkshire Local Plan Review (LPR) to 2036**

### **Scoping Report Consultation Statement**

**October 2018**

#### **Introduction**

Between February and March 2018 the Council invited comments on the proposed scope and content of the Local Plan Review to 2036 (LPR). Comments were also invited on the accompanying Sustainability Appraisal (SA) Scoping Report

This statement sets out a summary of the comments received to this consultation, the Council's response and sets out the next steps in taking the LPR forward.

#### **Local Plan Review Scoping Report**

In all, there were 81 respondents to the consultation on the LPR scoping report with some respondents commenting on all questions and others only commenting on those questions of specific interest to them. A summary of the respondents' comments to each question is provided here, together with a summary of the Council's response, with the full comments provided in Appendix A.

#### **Q1 – Do you agree with the proposed scope of the review of the Local Plan? If not please tell us why and give reasons for your answer.**

*(Comments received = 56)*

The majority of respondents agreed with the proposed scope of the review and were clear in the need for it to be comprehensive and based on an up to date evidence base. They were also in agreement of the need to review the Council's housing requirement and spatial strategy, settlement hierarchy, development management policies and existing settlement boundaries consistent with the requirements of existing and emerging national planning policy.

There was a concern from a few respondents that the Scoping Report lacked sufficient evidence and context and that a further body of work should therefore be produced to enable more meaningful and constructive responses from stakeholders. The need for the Council to re-examine its approach once the revised NPPF and NPPG were published was also stressed. Housing need for instance will have to be assessed using the government's standard method contained in the revised NPPF. The need for the Council to work in cooperation with neighbouring authorities was also highlighted, especially if the revised NPPF confirms the need for Statements of Common Ground.

The length of the plan period was raised by a few respondents from the development industry. The review will need to plan for at least 15 years from its adoption and is

intended to cover the period to 2036. As the review is not anticipated to be adopted before the end of 2020 however, they felt that consideration should be should be given to adopting a plan with an end date of 2041.

One respondent from the development industry requested the Council provide greater clarity as to the extent of the review in dealing with a strategy for housing delivery in the short to medium term. They were not clear whether the scope of the review was to identify non-strategic sites as well as strategic sites. Another respondent also emphasised the need for there to be a clear distinction between strategic and local policies and that in order to achieve this, consideration should be given to preparing two separate plans, albeit in parallel and co-terminus. Some respondents highlighted specific concerns within their remit that will be considered further as the Review progresses and which will be taken forward through the development of particular policies such as the needs of the racehorse and equestrian industry. Some statutory consultees also drew attention to various requirements and other guidance that will need to be considered as the review progresses. One parish council expressed its disappointment that there was no real emphasis on likely changes to the way that people live their lives and their changing aspirations such as the impact that electric and possibly autonomous vehicles may have.

Some in the development industry highlighted the need for clarification around the approach the Council will take to housing in rural areas, particularly the need to achieve a good mix of smaller sites and the need to identify opportunities for villages to grow and thrive.

Other issues raised are considered under later questions.

**Q2 – Do you agree with the draft strategic objectives we have identified in Appendix 1? If not please tell us why and give reasons for your answer.**

*(Comments received = 56)*

Overall there was general agreement with the revised strategic objectives. As part of that support though there were a number of requests for the clarification of certain definitions and also suggestions for revised wording and the inclusion of specific issues. The importance of ensuring the objectives are consistent with those contained in other Council plans and strategies was stressed.

The inclusion of a vision for the Review was thought to be a useful as it would help set the objectives in context.

Several responses expressed concern that the objectives did not distinguish between urban and rural areas. It was felt that specific mention of rural communities would be helpful and would encourage the provision of housing and support economic growth in rural areas.

The need for the objectives to be written in order to deliver and manage growth over the plan period was highlighted, whether that be moving towards a low carbon economy, fostering economic growth, or the encouragement of leisure activities.

There was some discussion, particularly from the development industry about ranking of the objectives. Two developers felt that there should be a ranking of what they felt were the most valuable objectives (i.e. housing, climate change and sustainable and quality development), whilst a third felt there should be ranking that is reflective of the overarching objectives of the planning system.

Finally, there was also some overlap with issues considered in more detail under other questions such as:

- the need for an appropriate evidence base particularly for economy and green infrastructure;
- the need to meet the objectively assessed need over the Western Berkshire Housing Market Area;
- the need for the allocation of development sites of varying sizes;
- the need to meet the housing needs of key workers and other particular groups;
- to consider development needs and the provision of infrastructure in parallel. There was a feeling that the pressure on existing infrastructure was being overlooked and that infrastructure identified in the Infrastructure Delivery Plan has not delivered.

**Q3 - Do you think our existing spatial strategy (as set out in the Core Strategy) is the most appropriate for development to 2036? If not please tell us why and give reasons for your answer.**

*(Comments received = 47)*

The majority of respondents stated that they thought the existing spatial strategy had worked well and that it would continue to be the most appropriate approach for development up to 2036 in West Berkshire. With one exception, this included all parish councils and neighbourhood planning groups. The parish council that disagreed argued for further consideration to be given to garden villages where it felt that infrastructure needs and a community sense of place could be considered more holistically. The development industry highlighted the fact that the spatial strategy would need to be altered in order to accommodate a new settlement and were divided as to whether this was a good idea.

The capacity of the Eastern Urban Area to accommodate more growth was questioned, particularly the tension that exists between the need for development in the area and its location on the edge of the AONB. The role of Thatcham was also raised, with the expectation that following a period of restraint in the current plan, there was now an opportunity to plan for a period of growth.

There were some respondents who felt that whilst the spatial approach itself was acceptable in principle, the Council will need to re-examine the settlement hierarchy which supports it, in more detail, in order to establish the role and function of each settlement in each area. Specific concerns were raised, from both the development industry and some local communities that certain settlements were not now in the right category. Another suggested that a new category of 'principal rural service centres' could be introduced whilst others thought that smaller villages and the rural

areas themselves should also be included. The relationship that some settlements on the edge on the District have with settlements in adjoining authorities was also raised.

It was generally considered that a review of settlement boundaries for all settlements will be an important part of the Review and that this process should then be used to inform the overall spatial strategy for the District. A couple of respondents from the development industry felt the Council needed more evidence before it could make any decisions. Overall, the development industry felt the Council needed to be more flexible in its approach to rural settlements, particularly to those which currently sit below the current hierarchy. There were also suggestions from a few site promoters that more development, particularly in smaller villages, would help prevent the further loss of rural services.

**Q4 – Do you agree that dividing the District into different geographical areas is still the most appropriate way to deliver the spatial strategy?**

*(Comments received = 41)*

The majority of respondents, including parish councils and statutory consultees, stated that they felt dividing the district into geographical areas is still an appropriate mechanism to deliver the spatial strategy. They outlined that this approach is an effective way to meet housing need and it also takes into account the distinctive features and characteristics of the district, which allows policies to be focused and relevant rather than taking a broad brush approach. One parish council disagreed with this approach however, and responded stating that a more district wide approach should be adopted, but that the different characteristics of the district should be recognised among other equally important factors. One statutory consultee highlighted the need to carry out the sequential test for fluvial flood risk when considering the location of development.

Some of the development industry considered the geographical areas were appropriate as a broad objective but that it would need to be balanced against an amended settlement hierarchy. Some respondents took this further and felt that a more sophisticated method of assessing sustainability should be applied, and highlighted the settlement hierarchy itself as a more appropriate way to deliver the spatial strategy. The relationship between the spatial areas and the settlement hierarchy was strongly emphasised, with many highlighting the important role the settlement hierarchy plays in identifying sustainable locations for development. It was felt by some in the development industry that geographical areas would ensure that the supply of housing land in the district would not be over reliant on a small number of large scale strategic sites but allowed for an even spread of sites across the district. There was support from a landowner for retaining Newbury and Thatcham as a distinct area, and others stated that overlapping polices which sub-divide requirements across areas should be avoided to ensure transparency. A couple of respondents from the development industry felt the Council needed more evidence before it could make any decisions.

One landowner stated that dividing the district into geographical areas imposed arbitrary boundaries and distributing the housing requirement accordingly sits uncomfortably with the more strategic approach to planning which is emerging. It was outlined that geographical areas has the potential to lead to parochial decisions and compromise opportunities for sustainable patterns of growth. One of the responses from the development industry felt the Council had a tendency to apply these artificial boundaries too rigidly in plan making and decision-taking and that flexibility was required, especially with regard to allocating housing figures for each spatial area.

Potential growth at Grazeley raised concern among some respondents who felt that such growth should not restrict the growth of other sites within that spatial area. Specific concern was also raised by landowners as to how a new settlement would fit into the mechanism of dividing the district into geographical areas. The specific need to identify land in rural areas and on smaller sized sites, as set out within the draft NPPF was set out in the responses of some site promoters. The relationship that some settlements on the edge on the District have with settlements in adjoining authorities was also raised.

**Q5 – Do you think there is a realistic opportunity for a large scale development to the south of Reading which could have the potential to be incorporated into the overall spatial strategy for the District? Please give reasons for your answer.**

*(Comments received = 49)*

Comments were divided on this issue. The majority of respondents who considered that there was potential for development in this area were cautious and felt it was dependent on a number of issues which would need to be resolved, some of which were potentially significant. These included the impact on infrastructure, especially the transport network; the amount of infrastructure that development would require; environmental constraints; AWE constraints; impact on green space and the impact on potential mineral sites.

Local communities who felt that would be directly affected by such a development in this area were not in favour of the proposal, citing similar concerns to those identified above.

Whilst acknowledging that development in this location could be seen as a strategic opportunity for authorities in the Western Housing Market Area some respondents felt that the area south of Reading has little, if any, functional relationship with the remainder of West Berkshire and that development in this location would serve to meet the needs of other authorities, namely Reading and Wokingham rather than West Berkshire. Others also felt that it would also undermine the viability and vitality of the existing settlement hierarchy in the District. At the same time, the risks of delivering through such a large strategic site were highlighted by those in the development industry, in particular the long lead in period for such a development. The need for the Plan to be flexible and to include a range of smaller sites across the

District which would be able to deliver at an earlier stage in the plan period was also emphasised by many in the industry.

**Q6 – Do you agree with our assessment of existing planning policies? Please give reasons for your answer. What do you think works well at the moment and what do you think we could do better? Please clearly identify the policy area or specific policy as a sub-heading.**

*(Comments received = 56)*

The majority of respondents agreed with the Council's aim to assess existing planning policies, including where there will be clarification for development management purposes (such as Core Strategy CS4). Some site promoters said that there was not enough information to be able to make an assessment of policies. Some respondents highlighted specific concerns within their remit that will be considered further as the Review progresses and which will be taken forward through the development of particular policies. This includes the needs of the racehorse and equestrian industry, flooding, heritage assets, transport, water infrastructure, sport and recreation, community/cultural facilities, the Kennet and Avon Canal, and the expansion of Theale rail terminal.

There was general consensus that appropriate extensions to sustainable settlements may be a way forward. Some respondents, notably from the general public, were concerned with a settlement boundary review, and were keen to ensure a balance is retained between smaller villages and the main towns in the District. The housing number going forward needs to be based on up-to-date evidence, and would need to include greenfield sites.

New Greenham Park and the Atomic Weapons Establishment were keen to see a new policy or amendment to CS9 to reflect the strategic importance of both areas of employment.

There was a suggestion that there should be a review of all site allocations in the Housing Site Allocations DPD, including a review of sites which have not been delivered. One respondent was concerned that the delay in delivering sites such as Sandford was having the effect of developers submitting schemes for unallocated land outside of settlement boundaries (e.g. North Newbury).

Other comments received focus on including a policy for the redevelopment of redundant rural buildings, similar to Local Plan Policy ENV20; the clarification of green infrastructure; expanding Local Plan Policy ENV27 to include residential institutions for elderly care; that Core Strategy Policy CS16 should recognise any public benefits of development through flood risk management and mitigation; for Core Strategy CS6 to take into account the changes to the definition of affordable housing outlined in the NPPF; and for a review of retail centres to take into account available evidence.

**Q7 – Are there any other policy issues that you think should be considered as part of the review of the Local Plan? If so, what are they and tell us why you think they should be included.**

*(Comments received = 56)*

There was a wide range of responses to this question, and a common theme of responses related to the need for policies on health and wellbeing and sports and recreation, for elderly people's accommodation/extra care accommodation, and for community and cultural facilities. In terms of community and cultural facilities this focused on not only the protection but also the provision of such facilities, including churches, community halls, cinemas, theatres, pubs and music halls. One respondent suggested that development with any kind of community benefit should be allowed.

In terms of housing growth Thatcham should now be considered as a suitable location for allocations. There is a suggestion of allocating omission sites or 'back up' sites in the event where sites are not delivering the houses as envisaged, or there are other factors which influence the progress (e.g. economics). One respondent considered that the allocation of sites should concentrate on infilling and brownfield sites before greenfield sites. A respondent commented that there should be consideration of the 20% of housing allocations on sites less than 0.5 hectares, as per the revised NPPF. Similar to the respondents to question 6 there was consideration of the extension of sustainable settlements and the allocation of 'semi-rural' sites, and for the inclusion of a policy akin to former Local Plan Policy ENV20 for rural businesses.

Infrastructure was highlighted by respondents, with a statutory consultee encouraging a policy on water supply and wastewater. Footpaths, street lighting, health provision and educational establishments were also highlighted. Conversely, one respondent commented that if the housing and industry is planned correctly then leisure, health and cultural facilities will naturally develop.

When considering landscape, biodiversity and heritage there was comment that there should be a strengthening of policy on light pollution and the governance of external lighting, particularly in the AONB; that there should be a protection of irreplaceable habitats such as ancient woodland, and of watercourses; there should be a definitive definition of 'Green Infrastructure', which should encompass 'Blue Infrastructure'; and that there should be consideration of further detail of heritage assets.

When considering human health an internal consultee noted that a priority of the Council is for the protection and improvement of local air quality. Therefore, updating the policy for pollution and noise in line with new guidance is needed, rather than relying on the now deleted planning policy guidance notes.

There were queries about the duty to cooperate and taking on unmet need from surrounding authorities; housing affordability; and whether West Berkshire Council aim to boost the supply of housing when looking at the SHMA and Government target figures.

## **Sustainability Appraisal Scoping Report**

*(comments received = 207)*

The Scoping Report contained ten questions primarily relating to the quality of data contained with the report. In all, there were 27 respondents to the consultation on the local plan review scoping report with some respondents commenting on all questions and other only commenting on those questions of specific interest to them. A summary of the respondents' comments to each question is provided here, with the full comments provided in Appendix B.

There was an overall consensus that the baseline information was adequate with some exceptions relating to the age of some data and the paucity of data on green infrastructure, tourism and recreation, and the racehorse/equestrian industry. There were many useful suggestions to tighten up the evidence.

Overall there was general agreement with the key sustainability issues and objectives identified. A number of refinements were suggested from statutory bodies and 'tourism' proposed as an addition. Ranking the objectives was not seen as helpful.

There was some overlap with the issues raised under the Local Plan Review Scoping Report, including:

- the timescale of the Review;
- the justification for any large scale development to the south of Reading;
- an endorsement of cross boundary working;
- favouring large site allocations in and around urban areas as the most "sustainable locations" and in contrast;
- the benefits of allocating smaller sites adjacent to smaller sized settlements as a potential strategy for aiding housing delivery and supporting sustainable development in rural areas;
- the need for a settlement boundary review;
- a greater commitment to fulfil the unmet housing need from neighbouring authorities, especially Reading;
- the need for an overall vision to provide context and sense of direction;
- the weight to be given to the draft and final versions of the revised NPPF;
- the need to present housing numbers by spatial area;
- the provision of housing for younger people and affordable housing;
- the provision of necessary infrastructure with the developments, including implications of electric/zero carbon technological developments.

## **Summary of Council Response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR). The Council will need to prepare the Review to conform to the revised national policy in the NPPF published

on 24th July 2018. Detailed comments made will be taken forward in the development of the spatial strategy and both strategic and local policies as appropriate.

It is encouraging to see that there is general agreement with the proposed scope of the Review. The importance of an adequate, up to date and relevant evidence base is acknowledged as is the need to undertake the LPR in close cooperation with our neighbouring authorities.

The Council agrees that the inclusion of an overarching Vision would be particularly helpful and assist in setting the Strategic Objectives in context.

The general agreement amongst respondents with the draft strategic objectives is welcomed. It is acknowledged that they are broad and wide ranging and that is some overlap between them. In this context some definitions, such as culture and heritage, are also used in their broadest sense. The strategic objectives apply across the whole of the District, in both urban and rural areas. Although some respondents proposed a ranking of the objectives the Council does not consider, in the interests of sustainable development, that that would be appropriate.

The objective on housing is to ensure that the assessed need for market and affordable housing up to 2036 will be met. Housing need will be assessed using the government's standard method contained in the revised NPPF and PPG. This assessment will use the most up to date household projections as a starting point and the resultant need figure is considered to represent the minimum requirement to be included within the Local Plan Review to 2036. This figure will supersede the OAN in the 2016 Berkshire SHMA. The LPR will set out the strategy to meet this revised requirement. It will consider both strategic and non-strategic growth opportunities to meet the need over the plan period, including housing in rural areas of the District. The HELAA will provide evidence of growth opportunities in the area and will identify sites that have potential for development to inform the spatial strategy. Most of the sites that will be included were submitted through the Call for Sites (December 2016 to March 2017), through which agents and the public were invited to submit sites that they considered developable.

The LPR will contain a housing trajectory as required by national policy, although a trajectory can only represent a point in time and will be subject to review through the Annual Monitoring Report.

The support given to the continuation of the existing spatial strategy is welcomed but the capacity of the Eastern Urban Area to accommodate future growth is an issue which requires further consideration. The Council will therefore review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries.

A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018. It is intended that all settlement boundaries are reviewed as part of the Local Plan Review.

The four Western Berkshire authorities are committed to meeting the housing requirement across the Western Housing Market Area. To this end the Councils have agreed a Memorandum of Understanding which states that the four authorities will continue to work together to ensure that local plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need in Reading.

The Council acknowledges that large new settlements are not without their problems and in seeking to identify land for new homes national policy notes the importance of identifying a mix of sites across the District. Should development be considered appropriate at Grazeley, given the strategic nature of the site, any development would be delivered in partnership with Wokingham Borough Council. Reading Borough Council would also be involved in the process. It would require comprehensive masterplanning to ensure that it was delivered in the most sustainable way and part of this would involve a detailed transport assessment of the existing network. Given that such a large scale development would likely impact significantly on the existing network, developer contributions from the development would go directly to funding any improvements required. A detailed assessment of the green infrastructure would also be required, including the identification of any suitable alternative greenspace (SANG). There would be a need for extensive consultation with AWE Burghfield and the Office for Nuclear Regulation (ONR) to ensure that any development was compatible the facility at AWE Burghfield and delivered in conformity with the Detailed Emergency Planning Zone (DEPZ).

### **The next steps**

Following an analysis of the responses received on both the Local Plan Review and SA Scoping Reports the Council will now:

- Create a vision for how West Berkshire should look in 2036 which will provide the context for the Strategic Objectives
- Finalise the Strategic Objectives
- Consider the overall strategy for the pattern and scale of development across the District. As part of this we will:
  - review the existing strategy and identify the direction we intend to take at both a strategic and local level in accordance with the revised NPPF;
  - review the character of and evidence we have for the existing spatial areas and whether we can introduce flexibility by reviewing boundaries. We will set this out in a topic paper which we will consult upon in November/December 2018;
  - review the spatial distribution of development across the District. This will include:

- consideration of how we meet the need for housing and employment land to 2036 through a review of the settlement hierarchy and settlement boundaries. We will firstly look at producing a methodology for the review of the settlement hierarchy and also produce criteria for a review of settlement boundaries which we will consult upon in November/December 2018;
  - analysis of sites being promoted for development through the HELAA and, as part of this, the identification of potential broad locations for development. In June/July 2019 we will publish a list of all sites that have been submitted to us for consideration and invite comments on the suitability of those sites for development.
- Continue to update the evidence base to inform the Review. Where appropriate we will publish updated documents for information when we undertake further public consultation in November/December 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q1: Do you agree with the proposed scope of the review of the Local Plan? If not please tell us why and give reasons for your answer.**

Number of responses received: 56

Respondent	Response
<b>Internal</b>	
Archaeology Team West Berkshire Council	Broadly agree
Public Transport Team West Berkshire Council	I agree with the proposed scope of the review of the Local Plan and note that it is not the purpose of this review to change or remove policies that seek to support the delivery of sustainable development.
<b>Statutory consultees</b>	
Hampshire County Council	We agree with the proposed scope of the review of the Local Plan.
Stratfield Mortimer Parish Council	<p>The proposed scope of the review seems to cover all the areas most directly linked to the planning process. However, there seems to be no real emphasis on likely changes to the way that people live their lives and their changing aspirations.</p> <p>For example, there is now general recognition that before the end of the plan period electric vehicles and possibly autonomous vehicles will form a majority of the vehicle on the roads. This will have a major impact on how people will carry out day to day tasks and on the required transport infrastructure, and hence such factors should be considered in the roll forward of the LDP.</p> <p>Of course, nobody can accurately forecast future developments but in many areas the direction of travel is clear and these should be examined for their impact on planning policy. If this is not done there is a danger, to quote an old adage, that the Generals will be fighting the last war.</p>
Newbury Town Council	<p>The current position of the Town Council on the direction that Newbury should take over the Plan period is represented by the Draft Newbury Town Plan 2019-36, recently approved by the Town Council for consultation by the public and West Berkshire Council. After the consultation ends on 18th March, a final version will be adopted.</p> <p>The Newbury Town Plan is the Town Council's recommended replacement for ADPP2 (with regard to Newbury) in the present Local Plan.</p>

Respondent	Response
Thatcham Town Council	Yes
Holybrook Parish Council	Holybrook Parish Council agree with the proposed scope of the review of the local plan and believe that the report has value.
Pangbourne Parish Council	It covers all the main policy issues so I agree with its scope
Burghfield Parish Council	Yes
Burghfield NDP Group	Yes
Environment Agency	This question is not within our remit to answer but we welcome the opportunity to comments on the local plan policies and objectives at an early stage in the local plan process. We also expect to be consulted on the local plan evidence base such as the Strategic Flood Risk Assessment (SFRA) the flood risk sequential test and the water cycle study.
Historic England	<p>The scope of the Local Plan Review will naturally be wide, but as the Government’s advisers on the historic environment, we have confined our comments to our remit, and are pleased to make the following general and specific comments. The National Planning Policy Framework (NPPF) makes it clear that the conservation and enhancement of the historic environment is an integral part of sustainable development and sets out a number of specific requirements for the historic environment in local plans. Local plans should:</p> <ul style="list-style-type: none"> <li>• set out a positive strategy for the conservation and enjoyment of the historic environment [126];</li> <li>• include strategic policies to deliver the conservation and enhancement of the historic environment [156];</li> <li>• contain a clear strategy for enhancing the natural, built and historic environment [157];</li> <li>• identify land where development would be inappropriate, e.g. for its environmental or historic significance [157];</li> <li>• be based on adequate, up-to-date and relevant evidence about the historic environment [158 and 169].</li> </ul> <p>It should be noted that the definition of “historic environment” in the NPPF is wide-ranging, encompassing more than just the built environment: “All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.”</p> <p>Although the last of the requirements above, an adequate, up-to-date and relevant evidence base to underpin the strategy and policies of the Local Plan is really the starting point. When gathering evidence, it is important to bear in mind that this is not simply an exercise in setting out known sites but, rather, in understanding the value to society (i.e. the significance) of sites both known (such as those on the National Heritage List for England, see <a href="http://www.HistoricEngland.org.uk/listing/the-list">www.HistoricEngland.org.uk/listing/the-list</a>) and potential, without which an understanding of the sometimes subtle qualities of the local distinctiveness and character of the local area may be easily lost. In particular:</p> <ul style="list-style-type: none"> <li>• In some cases, it might be necessary to identify heritage assets outside a local authority area, e.g. where there are likely to be setting impacts caused by potential development proposals within that area.</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• Some asset types are not currently well-recorded. The Register of Parks and Gardens of Historic Interest in England, for example, is thought to represent only around two-thirds of sites potentially deserving inclusion.</li> <li>• Evidence gathering can help identify parts of a locality that may be worthy of designation as a Conservation Area, or may merit local listing.</li> <li>• Assessing the likelihood of currently unidentified heritage assets being discovered, particularly sites of historic and/or archaeological interest, will help to future proof the plan.</li> </ul> <p>It may be helpful to collate this information within a Heritage Topic Paper to draw together the evidence prepared and the subsequent implications and actions required.</p> <p>What historic environment evidence does the Council have in addition to the National Heritage List for England, Historic England's Heritage at Risk Register and the Berkshire Historic Environment Record? Conservation Area Character Appraisals? Historic Landscape Characterisation? Is there a list of locally important heritage assets? Has the Council undertaken a survey of grade II buildings at risk? Is there an Extensive Urban Survey and/or Urban Archaeological Database. Are there any bespoke studies such as archaeological assessments or Tall Buildings studies?</p> <p>We will expect the Council to have an adequate, up-to-date and relevant historic environment evidence base and to demonstrate in the Local Plan how that historic evidence base has informed and influenced the Plan's policies and site allocations.</p> <p>If the evidence base for the historic environment is weak, the Council may need to commission proportionate research, for example:</p> <ul style="list-style-type: none"> <li>• detailed historic characterisation work assessing the impact of a proposal for a major urban extension or rural development;</li> <li>• visual impact assessments, considering the potential impact of allocations upon the setting of important heritage assets;</li> <li>• seeking the views of the local community about what they value about the historic environment of their local area (NPPF, Paragraph 155); and/or</li> <li>• an appropriate archaeological assessment to consider whether heritage assets with archaeological potential are likely to be present in areas where the HER indicates that there has been little or no previous investigation.</li> </ul> <p>Work in putting together Local Plans will often generate new evidence of the state and significance of the historic environment. Documents, such as historic landscape characterisations, strategic environmental assessments, conservation area appraisals, economic development studies and those supporting supplementary planning documents and local listing assessments, will often contain new evidence.</p> <p>Local planning authorities will find it useful to collect this information and make it publicly available, including through the Historic Environment Record. The information can be invaluable in improving plan-making and decision-making in the future and is of significant public benefit in furthering the understanding of our surroundings and our past.</p> <p>The evidence base for the historic environment may also assist with the preparation of the following:</p> <ul style="list-style-type: none"> <li>o assessments developed to meet the goal of achieving economic, social and environmental gains jointly and simultaneously;</li> <li>o the Sustainability Appraisal which accompanies the Local Plan; and</li> </ul>

Respondent	Response
	<p>o appropriate indicators for monitoring the delivery of the Plan</p> <p>As regards the required positive strategy for the conservation and enjoyment of the historic environment, the NPPF advises that, in developing this strategy, local planning authorities should take into account:</p> <ul style="list-style-type: none"> <li>● the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;</li> <li>● the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;</li> <li>● the desirability of new development making a positive contribution to local character and distinctiveness; and</li> <li>● opportunities to draw on the contribution made by the historic environment to the character of a place.</li> </ul> <p>We consider that the positive strategy for the conservation and enjoyment of, and the clear strategy for enhancing, the historic environment required by the NPPF, is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development including within their setting that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.</p> <p>This strategic approach can inform all aspects of the planning system by recognising and reinforcing the historic significance of places. As part of a sound conservation strategy, policies for local housing, retail and transport, for example, may need to be tailored to achieve the positive improvements in the historic environment that the NPPF expects (NPPF, paragraph 8).</p> <p>We also consider that the positive and clear strategy should comprise recognition throughout the Plan of the importance of the historic environment, of the historic environment's role in delivering the Plan's vision and the wider economic, social and environmental objectives for the Plan area, and of the potential impacts of the Plan's policies and proposals on the historic environment.</p> <p>Consequently, the local plan might need to consider the inter-relationship of the objectives for the historic environment with the following issues of local importance:</p> <ul style="list-style-type: none"> <li>● Building a strong, competitive economy – How might the plan conserve and enhance the quality of the historic environment in order to encourage tourism, help create successful places for businesses to locate and attract inward investment? What opportunities are there for heritage-led regeneration?</li> <li>● Ensuring the vitality of town centres and villages – What role can the historic environment play in increasing the vitality and attractiveness of town and village centres?</li> <li>● Supporting a prosperous rural economy – What opportunities does the reuse or adaptation of traditional buildings provide for supporting the rural economy or providing homes for local people? What potential is there for new heritage-led tourism initiatives?</li> <li>● Promoting sustainable transport – How might new or improved roads and other transport infrastructure be delivered in a manner which also conserves the historic environment of the area? Could the introduction of sustainable transport initiatives offer related opportunities for heritage through improving street/ traffic management or public realm enhancement at the same time?</li> <li>● Delivering a wide choice of high quality homes – How might the plan encourage adaptive reuse of historic buildings? How might new residential developments best be integrated into historic areas?</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• Requiring good design – How might the defining characteristics of each part of the plan area be reinforced in the approach to design?</li> </ul> <p>In formulating the strategy we consider it is advisable and often necessary to consider the following factors:</p> <ul style="list-style-type: none"> <li>• How the historic environment can assist the delivery of the positive strategy and the economic, social and environmental objectives for the plan area (NPPF, paragraphs 126 and 132 and Sections 66 and 72 of the Planning (Listed Buildings &amp; Conservation Areas) Act 1990);</li> <li>• How the plan will address particular issues identified during the development of the evidence base, including heritage at risk and the reuse of buildings;</li> <li>• The location, design and use of future development and how it can contribute to local identity and distinctiveness;</li> <li>• The interrelationship between conservation of heritage assets and green infrastructure, landscape, regeneration, economic development, transport works, infrastructure planning, tourism, social and cultural assets, town centres and climate change mitigation/adaptation (NPPF, paragraph 126);</li> <li>• The means by which new development in and around designated heritage assets might enhance or better reveal their character and significance (NPPF, paragraph 137);</li> <li>• The means by which new development in Conservation Areas and within the setting of heritage assets might enhance or better reveal their significance (NPPF, paragraph 137);</li> <li>• How Historic Environment Records and local lists might assist in identifying and managing the conservation of non-designated heritage assets;</li> <li>• How the archaeology of the plan area might be managed;</li> <li>• The possible role for CIL and/or s106 in delivery of required infrastructure;</li> <li>• Whether master plans or design briefs need to be prepared for significant sites where major change is proposed;</li> <li>• What implementation partners need to be identified in order to deliver the positive strategy;</li> <li>• What indicators should be used to monitor the heritage strategy's effectiveness; and,</li> <li>• In order to deliver an effective strategy for the conservation of the historic environment, is there a need for the plan to include Development Management Policies and where appropriate specific policies for specific assets or specific areas within the plan area? (Further comments on this matter are set out later in this letter)</li> </ul> <p>The National Planning Policy Framework requires, in paragraph 126, local planning authorities to set out in their local plans a "positive strategy for the conservation and enjoyment of the historic environment". Paragraph 157 of the Framework requires local plans to contain a "clear strategy for enhancing the.....historic environment" and paragraph 156 requires local plans to contain strategic policies "to deliver.....the conservation and enhancement of the.....historic environment".</p> <p>We consider the words "positive", "enhancing" and "deliver" are significant, and we believe that the Plan (and Council) should be proactive in the conservation and enhancement of the historic environment. National Planning Practice Guidance states "Such a [positive] strategy should recognise that conservation is not a passive exercise", whilst paragraph 9 of the NPPF explains that "pursuing sustainable development involves seeking positive improvements in the</p>

Respondent	Response
	<p>quality of the built, natural and historic environment". Conservation is certainly not a stand-alone exercise satisfied by stand-alone policies that repeat the NPPF objectives.</p> <p>We therefore look to local plans to contain commitments to positive measures for the historic environment e.g. a programme of completing and reviewing conservation area appraisals, the implementation of Article 4 Directions where the special interest of a conservation area is being lost through permitted development, the completion of a list of locally important heritage assets or a survey of grade II buildings at risk.</p> <p>The Council should assess whether or not it should identify any areas where certain types of development might need to be limited or would be inappropriate due to the impact that they might have upon the historic environment (NPPF, Paragraph 157). This might include, for example, tall buildings within identified sensitive view corridors.</p> <p>The plan will be the starting point for decisions on planning applications, and neighbourhood plans are only required to be in general conformity with the strategic policies of the Local Plan (NPPF, paragraph 184). Consequently, sustainably managing the historic environment is best achieved by identifying clear strategic policies to deliver the conservation and enhancement of the historic environment, as also required by paragraph 156 of the National Planning Policy Framework. We will therefore look to the Local Plan Review to contain a strategic policy for the conservation and enhancement of the historic environment.</p> <p>We encourage the inclusion in local plans of specific development management policies setting out the requirements of development proposals and providing a clear indication of how a decision maker should react to a development proposal affecting a heritage asset or assets as required by paragraph 154 of the NPPF, particularly in the following circumstances:</p> <ul style="list-style-type: none"> <li>● Those areas where Development Management Policies are necessary to amplify a general, overarching, Strategic Policy for the historic environment – for instance, to deal with particularly distinctive or important historic environment features or significance (this would be particularly relevant for the Local Plan Review);</li> <li>● Those areas where further clarity would be useful – for instance, how the Council will determine applications affecting archaeological remains of less than national importance;</li> <li>● Those areas where Development Management Policies may be necessary to address the local circumstances of the Plan area - for example, to clarify the approach to development within an Archaeological Notification Area, or to protect or enhance important views and vistas;</li> </ul> <p>This policy or policies should include criteria for assessing the potential impact of development proposals on the significance of all relevant heritage assets: designated assets such as listed buildings, Scheduled Monuments, conservation areas and Registered Historic Parks and Gardens, and non-designated assets, such as those of local significance (as identified on local lists), archaeological deposits (as identified on the Berkshire Historic Environment Record) and historic landscapes (as identified in the West Berkshire Historic Landscape Character Assessment).</p> <p>The policy or policies should identify those particular characteristics of each type of heritage asset that should be protected or enhanced through development proposals. Further advice on considerations for heritage assets in development management policies is set out in an appendix to this letter.</p>

Respondent	Response
	<p>The development management policy or policies should reflect the requirement in paragraph 132 of the NPPF that any harm or loss of a heritage asset should require clear and convincing justification, most often in the form of public benefits. In accordance with paragraphs 132 -135 of the NPPF, the more important the asset, the greater the weight that should be given to its conservation – the greatest weight should be given to designated heritage assets of the highest significance, then other designated assets, then non-designated assets (including archaeological remains, except those that are demonstrably of equivalent significance to designated heritage assets, which should be considered subject to the policies for designated heritage assets).</p> <p>We would expect the development management policy or policies to set out what is required of applicants e.g. “Applications which affect, or have the potential to affect, heritage assets will be expected to;</p> <p>i) describe the significance of the asset and its setting, using appropriate expertise; at a level of detail proportionate to its significance and sufficient to understand the potential impact of the proposal; using appropriate references such as the Historic Environment Record and, if necessary, original survey (including, for assets of archaeological interest, an appropriate desk-based assessment and, where necessary, a field evaluation); and</p> <p>ii) to set out the impact of the development on the heritage assets and a suggested mitigation that is proportionate to the impact and the significance of the heritage asset, including where possible positive opportunities to conserve and enjoy heritage assets as well as recording loss and advancing knowledge.</p> <p>Where development is permitted that would result in harm to or loss of the significance of a heritage asset, developers will be required to record and advance understanding of the significance of that asset, in a manner appropriate to its importance and the impact, and to make that evidence publicly accessible.”</p> <p>The NPPF requires the positive strategy for the conservation and enjoyment of the historic environment to include heritage assets most at risk through neglect, decay or other threats.</p> <p>It should be noted that outside London the Register does not include grade II listed secular buildings at risk, and that other heritage assets may become at risk during the life of the Local Plan. We therefore suggest including wording within local plans along the lines of:</p> <p>“The Council will monitor buildings or other heritage assets at risk through neglect, decay or other threats, proactively seeking solutions for assets at risk through discussions with owners and willingness to consider positively development schemes that would ensure the repair and maintenance of the asset, and, as a last resort, using its statutory powers”.</p> <p>We have produced a revised Good Practice Advice Note: 1: “The Historic Environment in Local Plans”, available on the Historic England website: (<a href="http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/">http://historicengland.org.uk/images-books/publications/gpa1-historic-environment-local-plans/</a>) which provides advice on the matters considered above.</p> <p>As regards site allocations, whatever the potential sources of land for development, Historic England will expect the selection of sites to be allocated for housing (or any development) to be based on, inter alia, full and proper consideration of the potential impacts of development on the historic environment; in particular on heritage assets and their setting, and the need to conserve and enhance those assets. This will require the use of a comprehensive historic environment</p>

Respondent	Response
	<p>evidence base as explained earlier in this letter, including specific studies to understand the significance of assets that may be affected.</p> <p>We have prepared specific advice on The Historic Environment and Site Allocations in Local Plans, <a href="http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/">http://www.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/</a>. Advice on the setting of heritage assets is given in Historic England's Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (<a href="http://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/">http://www.historicengland.org.uk/images-books/publications/gpa3-setting-of-heritage-assets/</a>).</p> <p>We will expect the Council to demonstrate how the historic environment has influenced its choice of sites (including those for gypsies and travellers), and to set out detailed overriding justification if it proposes the allocation of any sites that would have an adverse impact on a heritage asset or assets.</p>
Sport England	Yes, carrying out a review will focus where any additional work is required
Highways England	<p>Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. In the case of West Berkshire this relates to the M4 and A34.</p> <p>We would be concerned if any material increase in traffic were to occur on the SRN as a result of planned growth in West Berkshire without careful consideration of mitigation measures. It is important that the DPD provides the planning policy framework to ensure development cannot progress without the appropriate infrastructure in place.</p> <p>When considering proposals for growth, any impacts on the SRN will need to be identified and mitigated as far as reasonably possible. In general we will support a local authority proposal that considers sustainable measures which manage down demand and reduces the need to travel. Infrastructure improvements on the SRN should only be considered as a last resort.</p> <p>I have included below link to the M4 J3-12 Smart motorway project, where you can find more information and sign up for updates:  <a href="http://roads.highways.gov.uk/projects/m4-junctions-3-12-smart-motorway/">http://roads.highways.gov.uk/projects/m4-junctions-3-12-smart-motorway/</a></p> <p>For background, you may be interested to read "<i>The Strategic Road Network Planning for the Future</i>" which is a guide to working with Highways England on planning matters. Please see:  <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/461023/N150227_-_Highways_England_Planning_Document_FINAL-lo.pdf</a></p>
Savills (UK) Ltd for Thames Water Utilities Ltd	No objection
<b>General consultation bodies</b>	

Respondent	Response
Theatres Trust	Yes
Mid & West Berks Local Access Forum	We recommend close liaison with Local Transport Plans and Active Travel Plans because the infrastructure to encourage Active Travel (ie non-motorised travel for utility & recreational purposes) needs to be recognized and incorporated into Local Development Plans.
British Horse Society	<p>Yes. The Society is pleased to see that it is proposed to include reference to the Equestrian / Racehorse industry (often referred to the Horse Industry) in the new plan. We believe this is an important aspect to the West Berks community and hope a robust policy will be developed in the new plan to ensure the equestrian economy and community flourishes in West Berks.</p> <p>We have often referred other local authorities to the existing West Berks Local Plan as a good example of recognizing the value of the horse industry in their areas.</p> <p>As the BHS Access &amp; Bridleways officer for West Berks, I have to constantly argue for inclusion of provision for horses when new paths &amp; routes are being proposed. This should be automatic unless it is a completely urban environment where horses are unlikely to need access. This is particularly so when dealing with Council's Highways depts.</p> <p>Walking and cycling strategies do not cover equestrian needs and often impinge on them. An assessment of equestrian needs should be made to ensure that the horse industry can thrive.</p>
Reading Gospel Hall Trust	Broadly, yes
<b>Other stakeholders</b>	
Robert Wallace	Not exactly thinking outside the box but I guess you have to start somewhere
David Lister	Yes
David Parry	This whole exercise worries me as it appears to be based on a study of housing needs before the referendum for leaving the EU. That potentially changes the housing demand with changes to immigration policy, but until it is all resolved then nobody knows the projected population numbers and hence housing demand to 2036!
William Graham	Yes
Neil Richardson	Appears to cover main areas of concern but not enough information on need for large scale development south of Reading.
Christopher Gent	We agree with the scope of the plan
<b>Landowners, site promoters and developers</b>	

Respondent	Response
Barton Willmore for Graham Child	<p>As an overall observation we would note that the Scoping Report lacks sufficient evidence and context. Consequently, we would expect to see a further body of work produced prior to the next consultation, to enable more meaningful and constructive responses from stakeholders. We note the Council's intention for this to be a Local Plan Review, rather than a new Local Plan in its entirety, however it is not considered sufficient evidence has been supplied to accurately assess how this may come to fruition, with regard to existing policies.</p> <p>Notwithstanding the above, our client is in broad support of the scope of the review of the Local Plan, as highlighted at paragraph 3.2 in the Scoping Report. In particular our client notes that the current adopted Development Plan consists of planning policies which are not reflective of the most up to date evidence of need. For example the housing requirement of 10,500 contained within the Core Strategy is based on the now revoked South East Plan requirement of 525 dwellings per annum. This is inconsistent with the requirements of paragraph 47 of the National Planning Policy Framework 2012 (NPPF) which requires local authorities to:</p> <p><b><i>“use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing, in the housing market area...”</i></b></p> <p>It is noted that the Draft Revised National Planning Policy Framework was published on 5th March, however this also states at paragraph 11, that:</p> <p><b><i>“b) strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas...”</i></b></p> <p>Our client also notes that although the Council produced their Housing Site Allocations Development Plan Document (HSA DPD) in May 2017, this does not supersede the Core Strategy and therefore does not take account of the most up to date evidence of need, instead the HSA DPD sits as a daughter document to the Core Strategy.</p> <p>As a consequence our client notes that a Local Plan and associated policies which reflect a national policy compliant housing requirement is long overdue and welcomes the Local Plan Review, insofar as it seeks to specifically address this issue, inter alia. Our client notes however that the most up to date assessment of need is considered to be the Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) 2016. However, we note that this document is yet to be tested at a Local Plan Examination and may indeed require updating itself.</p> <p>Our client would suggest therefore that the planned review of existing policies should not simply be taken in relation to whether they accord with national policy, but also whether they accord with the objectively assessed need, insofar as they allow sufficient sites to be brought forward.</p> <p>In line with the above, our client wishes to invite the Council to consider their land at Pangbourne Hill which is available in the short to medium term to deliver circa 41 homes, straddling the currently defined development boundary of Pangbourne. The site accords with the Council's current spatial strategy, however its delivery is affected by the restrictions imposed by policy C1 of the HSA DPD. It is considered that this may not be an isolated case and the Council should therefore look holistically at the policies and settlement boundaries across the district, to ensure sustainable sites able to contribute to the Districts housing requirement.</p> <p>Given our client's site is located within the North Wessex Downs AONB, to assist the Council with regard to the technical suitability of their site, these representations are accompanied by a landscape opportunities and constraints plan.</p>

Respondent	Response
	<p>Moreover, from these conclusions a capacity plan has been constructed, to ensure that the figures quoted are an accurate representation of achievability and to demonstrate to the Council how many dwellings the site is realistically able to accommodate.</p>
Barton Willmore for Sulham Estate	<p>Our initial comment which we request is noted throughout these representations is that the Scoping Report lacks sufficient evidence and context. As such, before confirming support to any element of the Local Plan Review, we would require more information as to the Council's understanding of the issues and options within the District. Consequently, we would expect to see a further body of work produced prior to the next consultation, to enable more meaningful and constructive responses from stakeholders. We note the Council's intention for this to be a Local Plan Review, rather than a new Local Plan in its entirety. However, it is not considered that sufficient evidence has been supplied to accurately assess how this will be prepared with regard to existing policies.</p> <p>Notwithstanding the above, we are supportive of an update to the Council's existing Development Plan. In particular, we note that the current adopted Development Plan consists of planning policies which are not reflective of the most up to date evidence of need. For example, the housing requirement of 10,500 contained within the Core Strategy is based on the now revoked South East Plan requirement of 525 dwellings per annum. This is inconsistent with the requirements of paragraph 47 of the National Planning Policy Framework 2012 (NPPF) which requires local authorities to:</p> <p><b><i>"use their evidence base to ensure their Local Plan meets the full, objectively assessed needs for market and affordable housing, in the housing market area..."</i></b></p> <p>It is noted that the Draft Revised National Planning Policy Framework was published on 5th March, however this also states at paragraph 11, that:</p> <p><b><i>"b) strategic plans should, as a minimum, provide for objectively assessed needs for housing and other development, as well as any needs that cannot be met within neighbouring areas..."</i></b></p> <p>Whilst we note that the Council have recently prepared and adopted their Housing Site Allocations Development Plan Document (HSA DPD) (May 2017), this does not supersede the Core Strategy and therefore does not take account of the most up to date evidence of need.</p> <p>Consequently, we welcome this Local Plan Review and the opportunity this affords the council to develop a plan that is compliant with national housing policy. With this in mind, we note that the most up to date assessment of need is considered to be the Berkshire (including South Bucks) Strategic Housing Market Assessment (SHMA) 2016. However, we note that this document is yet to be tested at a Local Plan Examination and may indeed require updating itself.</p> <p>The Council's awareness of accurate and fully up to date levels of need is instrumental to the review of existing policies. We would therefore suggest that the planned review of existing policies should not simply be taken in relation to whether they accord with national policy, but also whether they accord with the Council's responsibility in national policy to, as a minimum provide for objectively assessed needs.</p> <p>With this in mind, these representations and suite of supporting documents present the benefits of our client's site, land at Hall Place Farm Tilehurst, as a sustainable location for residential development of up to 80 dwellings which is deliverable with the short to medium term and able to make a positive contribution to West Berkshire meeting its housing needs.</p>

Respondent	Response
	<p>Despite the sustainable location of the site which is very well positioned in terms of local schools and public transport links, its delivery would be affected by the restrictions imposed by policy C1 of the HSA DPD as it is outside the settlement boundary. Within this in mind, we suggest that the Council take a holistic approach to reviewing settlement boundaries as these could be restricting the delivery of sustainable sites which could contribute to the housing requirement.</p> <p>In addition to Land at Hall Place Farm falling beyond the settlement boundary, the site is also within the North Wessex Downs AONB. Accordingly, there representations are supported by a Landscape Capacity Assessment which concludes that the parcel has the potential to accommodate residential development due to the influence of existing suburban fringe characteristics including the built form within the site and the existing settlement edge which is adjacent.</p>
Bewley Homes	<p>Whilst we agree with the scope of the review it is essential that the evidence base is both robust and up to date. When calculating future housing need for the borough regard should be had to the changing national guidance including any implication arising from the standard methodology and determine whether these are robust and fit for purpose when planning for future dwelling requirements in West Berkshire.</p> <p>It is also recognised that the Housing Market Area is very large and that there are relationships between authorities both within the HMA and beyond that could have implications on future housing need within the borough. It is a requirement that West Berkshire Council engages in discussions with adjoining authorities to be aware of any implications this has on housing need.</p>
Mark Carter for Mr R.L.A. Jones	<p>The Respondent welcomes the Review, and the scope of it, which includes a review of the overall housing requirements, the existing spatial strategy for the District, and a review of all existing housing allocations. However given that the new Local Plan will cover a further 10 year period from 2026 to 2036 it should be explicitly stated that new housing site allocations will be needed to meet the future levels of housing need. The Respondent has an interest in land at welcomes further housing sites in Lambourn including that previously identified as LAM007 "land between Folly Road, Rockfel Road and Stork House Drive".</p>
Carter Jonas for Hermitage Farms	<p>Hermitage Farms owns land on the edge of Hermitage, as shown on the plans attached. On behalf of Hermitage Farms, we agree that the main purpose of the Local Plan Review should be to assess the future levels of need for new homes and employment land and other land uses to 2036 and to provide an appropriate basis for housing, employment land and infrastructure provision over that period.</p> <p><u>Housing Need</u></p> <p>Paragraph 47 of the NPPF requires Local Plans to meet the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area. The presumption in favour of sustainable development within the NPPF (paragraph 15) sets out that plans should be based on meeting the need identified in full, where it is sustainable to do so. The housing requirement should deal with economic growth forecasts, affordability and comply with its obligations under the duty to cooperate.</p>

Respondent	Response
	<p>Hermitage Farms consider that in order to meet the full extent of job growth forecast the Council should be aiming to achieve the upper end of the housing requirement identified in the West Berkshire Strategic Housing Market Assessment (SHMA).</p> <p>Furthermore, the housing target required should be a minimum requirement to support the aims and objectives of paragraph 47 of the NPPF to 'significantly boost the supply of housing'.</p> <p>Where a Council is unable to meet all of its own identified housing need, it is required by legislation (the 2011 Localism Act) and Policy (NPPF paragraphs 178-182) to work with adjoining local authorities to consider where any shortfall can be met. West Berkshire may therefore be required to meet some of the housing need of neighbouring authorities.</p>
Fisher German for Mr Musgrave and Begley	Agree
Gladman Developments	<p>Gladman welcomes the Council's intention to review the Local Plan for West Berkshire and notes the ambition for this to cover a wide range of issues.</p> <p>Gladman consider that it is essential that a comprehensive review of the West Berkshire Local Plan is undertaken. This is particularly important because the existing Core Strategy and Housing Site Allocations pursue a strategy that was prepared at a time when the housing requirement for the District was determined through regional planning. It is crucial that local authorities keep their local plans up-to-date<sup>6</sup> and that the objectively assessed development needs of the area are planned for in full.</p> <p>The timeframe for the new Local Plan's preparation will necessitate the careful consideration of the Government's emerging revisions to the National Planning Policy Framework. It is therefore highly likely that these forthcoming changes will further influence the scope and content of the new West Berkshire Local Plan.</p>
Hallam Land Management	<p>These representations have been prepared on behalf of Hallam Land Management Limited (HLM) and Wilson Enterprises Limited (WEL). HLM and WEL jointly control land south of Reading, in the vicinity of Grazeley. Previous representations to West Berkshire, Wokingham and Reading have highlighted the eminent suitability of this location for a new settlement. Whilst the land controlled by HLM and WEL falls predominantly in Wokingham Borough, the proposal itself spans the District boundaries and requires all three Authorities to be committed to working in partnership to produce a Comprehensive Masterplan and coordinated Infrastructure Delivery Plan. HLM and WEL remain committed to working alongside the three Authorities to achieve this objective.</p>
Richard Nevill for The Chilton Estate	<p><u>Housing Need</u></p> <p>It is most important in regard to the provision of housing that the Council should review the numbers carefully so it ensures that sufficient land is provided for the period to be covered by the Local Plan taking into account the Government's statements on housing numbers and the requirement of a 5 year land supply in accordance with the provisions of the NPPF.</p>

Respondent	Response
	<p><u>Site Allocation Sizes</u></p> <p>There has been a Ministerial statement which specifies the treatment of small sites in relation to the provision of social housing and contributions. This is to encourage smaller sites to be brought forward for development. We consider it essential that support for smaller sites is included in the Local Plan in order to offer product diversity and to involve smaller builders and developers in the development process.</p>
Nexus Planning for Croudice	<p>The Scoping Report sets out the scope of the review at Chapter 3 but suggests that the purpose of the Local Plan Review will be to:</p> <p>“assess the future levels of need for new homes (including market, affordable and specialist housing and Gypsy and Traveller Accommodation) and employment land and other land uses up to 2036 and to provide an appropriate basis for housing employment land and infrastructure provision over that period”.</p> <p>The West Berkshire District Local Plan was adopted in 2002 and was intended to cover the period 1991 - 2006. A number of policies were duly saved, but were intended to be in place only until 2012. The adopted Local Plan is therefore substantially out-of-date.</p> <p>The West Berkshire Core Strategy was adopted in July 2012, following a protracted examination in public. It covers the period 2006 – 2026. It allocates strategic sites and contains, at Policy CS1, a housing requirement of at least 10,500 new homes between the period 2006 and 2026, equivalent to some 525 dwellings per annum. This figure was derived from the housing requirement for the District contained within the now revoked South East Plan Regional Spatial Strategy.</p> <p>The National Planning Policy Framework (the Framework) sets out at paragraph 47 that it is a Government objective: ‘To boost significantly the supply of housing...’</p> <p>In doing so, local planning authorities (‘LPA’s) are required to use their evidence base to meet the full, objectively assessed need (‘OAN’) for market and affordable housing in the housing market area, as far as it is consistent with the policies set out in the Framework.</p> <p>It was acknowledged by the Council during the course of the examination that the proposed housing requirement did not represent the full objectively assessed need for housing as required by the Framework at Paragraph 47. Nonetheless, the Inspector recommended adoption of the Plan subject to main modifications which make it clear that:</p> <ol style="list-style-type: none"> <li>i. The 10,500 housing figure is expressed as a minimum and not a ceiling;</li> <li>ii. An early review of housing provision on the basis of a new SHMA, produced within three years in cooperation with the other authorities in the HMA (i.e by July 2015).</li> </ol> <p>The Council has since chosen to prepare and adopt the Housing Site Allocation DPD (HSA DPD). However, the HSA DPD has a limited scope in identifying sites to meet the remaining part of the ‘at least’ 10,500 housing requirement from the Core Strategy, as well as additional sites to meet the first part of its OAN. As a consequence, the Council does not have a Framework compliant housing target embedded within a Development Plan, and based on the latest version of the Council’s Local Development Scheme, it will be more than 8 years following adoption of the Core Strategy before it does so.</p> <p>Against that background, it is imperative that a comprehensive review of the Local Plan is carried out, to include a Framework compliant housing requirement and allocations to meet that need over the Plan period. We therefore broadly</p>

Respondent	Response
	<p>support the scope of the review as set out at Section 3 of the Scoping Report.</p> <p>The Council will however be aware that the Government recently consulted on potential changes to the NPPF including amendments in terms of plan making. This incorporates proposed changes to the tests of soundness, including amendments to the 'positively prepared' test to emphasise the role of Plans in meeting objectively assessed needs for housing.</p> <p>Paragraph 29 also states that in order to demonstrate effective and on-going joint working, strategic plan-making authorities should prepare and maintain one or more statements of common ground, documenting the cross boundary matters being addressed and progress in cooperating to address these. Paragraph 36 goes on to set out the soundness tests and proposes a strengthening of both the 'positively prepared' and 'effective' soundness tests in particular so that local plans are (a) informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated; and (b) based on effective joint working on cross-boundary strategic matters, as evidenced by a statement of common ground.</p> <p>The scope of the review should be amended to make it clear that the Council will have regard to the emerging changes to the NPPF where applicable.</p>
Nexus Planning for Pangbourne Beaver Properties	<p>These representations have been prepared by Nexus Planning in response to the West Berkshire Local Plan Review to 2036 Scoping Report. They are submitted on behalf of Pangbourne Beaver Properties Ltd (PBP Ltd) who own and manage land and properties in Pangbourne. PBP Ltd support local businesses and traders who operate from within the village and wish to see them continue to thrive and prosper. In order for the village to maintain its vitality it is important that an appropriate amount of new housing to be provided for the village.</p> <p>The Council will be aware that PBP Ltd have secured planning permission for and undertaken, or facilitated, a range of developments within the village. These are all well designed developments that have contributed to the vitality and attractiveness of the village. These have included:</p> <p>Formosa Place on Pangbourne Hill (4 detached houses with a prominent frontage) Fernbrook on Reading Road (refurbishment and conversion of five flats in listed building) Shepard Place on Reading Road (16 houses and flats, including affordable units)</p> <p>Redevelopment of Bridge Garage for Bentley dealership (refurbishment and redevelopment of garage)</p> <p>Land to the west of Pangbourne Hill (35 houses and flats including affordable units)</p> <p>Pangbourne is a large village with a population of around 3,000. It lies on the south bank of the River Thames and benefits from good transport linkages by road and rail up and down the Thames valley. The centre of Reading is 7 miles to the east. Pangbourne has an excellent range of shops including many independent traders that are encouraged by PBP Ltd. It also has a good range of community facilities including a primary School and a range of leisure facilities. Pangbourne railway station provides an excellent service to Oxford, Reading and central London. Pangbourne village is therefore a highly sustainable location that services the village itself and its hinterland.</p> <p>In order to maintain the vitality of the village PBP Ltd wish to ensure that the West Berkshire Plan to 2036 makes provision for additional housing land to be allocated on land that they own to the north of Pangbourne Hill. Their land will allow for development of an appropriate scale for the village.</p>

Respondent	Response
	<p>The Scoping Report sets out the scope of the review at Chapter 3 and indicates that the purpose of the Local Plan Review will be to:</p> <p>“assess the future levels of need for new homes (including market, affordable and specialist housing and Gypsy and Traveller Accommodation) and employment land and other land uses up to 2036 and to provide an appropriate basis for housing employment land and infrastructure provision over that period”.</p> <p>The West Berkshire District Local Plan was adopted in 2002 and was intended to cover the period 1991-2006. A number of policies were duly saved, but were intended to be in place only until 2012. The adopted Local Plan is therefore substantially out-of-date.</p> <p>The West Berkshire Core Strategy was adopted in July 2012, following a protracted examination in public. It covers the period 2006 – 2026. It allocates strategic sites and contains, at Policy CS1, a housing requirement of <i>at least</i> 10,500 new homes between the period 2006 and 2026, equivalent to some 525 dwellings per annum. This figure was derived from the housing requirement for the District contained within the now revoked South East Plan Regional Spatial Strategy. The National Planning Policy Framework (the Framework) sets out at paragraph 47 that it is a Government objective: ‘To boost significantly the supply of housing...’</p> <p>In doing so, local planning authorities (‘LPA’s) are required to use their evidence base to meet the full, objectively assessed need (‘OAN’) for market and affordable housing in the housing market area, as far as it is consistent with the policies set out in the Framework.</p> <p>It was acknowledged by the Council during the course of the examination that the proposed housing requirement did not represent the full objectively assessed need for housing as required by the Framework at Paragraph 47. Nonetheless, the Inspector recommended adoption of the Plan subject to modifications which make it clear that:</p> <p>The 10,500 housing figure is expressed as a minimum and not a ceiling;</p> <ul style="list-style-type: none"> <li>• An early review of housing provision on the basis of a new SHMA, produced within three years in cooperation with the other authorities in the HMA (i.e by July 2015).</li> </ul> <p>The Council has prepared and adopted the Housing Site Allocation DPD (HSA DPD). However, the HSA DPD has a limited scope in identifying sites to meet the remaining part of the ‘at least’ 10,500 housing requirement from the Core Strategy, as well as additional sites to meet the first part of its OAN. As a consequence, the Council does not have a Framework compliant housing target embedded within a Development Plan, and based on the latest version of the Council’s Local Development Scheme, it will be more than 8 years following adoption of the Core Strategy before it does so.</p> <p>The Council is therefore urged to rapidly press ahead with the preparation of a new Local plan that makes appropriate housing allocations; and which takes account of the other representations in this document.</p>
Origin3 for Sandtrend	<p>These representations to the West Berkshire Local Plan Review Consultation (March 2018) have been prepared by Origin3 on behalf of Sandtrend Ltd in relation to their site at Land West of Wantage Road, Shaw-cum-Donnington, Newbury. A Site Location Plan is attached. These representations focus on the soundness of the Local Plan Review</p>

Respondent	Response
	<p>(LPR) spatial strategy and objectively assessed housing need (OAHN). The key themes running through these representations are as follows:</p> <ul style="list-style-type: none"> <li>• The OAHN should be revised upwards to take account of the latest SHMA (2016) and to account for Reading Borough's unmet need;</li> <li>• A clear strategy to deliver OAHN should be set out through the LPR;</li> <li>• The LPR should test and explore the strategic and non-strategic growth opportunities within the West of Berkshire Spatial Framework Plan, including growth opportunities north of Newbury;</li> <li>• The Council's delivery strategy should comprise a robust mix of sites for delivery within the short, medium and longer term;</li> </ul> <p>Sandtrend's site at Land West of Wantage Road, Shaw-cum-Donnington, Newbury should be allocated to deliver up to 200 new homes to ensure market and affordable housing delivery in the shorter term.</p> <p>The tests of soundness for local plans and policies are set out in NPPF paragraph 182.</p> <p>West Berkshire Council will also need to consider emerging national policy which is expected to be in place later this year. Namely updates to the NPPF which are currently being consulted on (March 2018).</p> <p>Due to the short timeframe remaining on the current plan period (up to 2026) and acknowledging that the Core Strategy was adopted in 2012, a fully comprehensive review of existing development plan policies is now required as a minimum. This is particularly important in light of recent updates to national policy (Town and Country Planning Regulations 2017 (Regulation 10A) which stipulate a Local Plan Review (LPR) must be <u>completed</u> every five years, starting from the date of adoption.</p> <p>At West Berkshire, the need to review the OAHN is particularly pertinent as the existing housing requirement and spatial strategy underpinning the Core Strategy (2012) is based on the now revoked pre-NPPF South East Plan. The existing OAHN is therefore based on evidence pre-NPPF and as such does not account for the significant boost in new homes required by the Government or emerging updates to national policy.</p> <p>Through this LPR process West Berkshire will therefore need to establish the OAHN for the new plan period based on up to date evidence in the Berkshire Strategic Housing Market Assessment (SHMA) and taking into account updates to national policy and the introduction of a Standardised OAHN Methodology. The OAHN will also need to account for unmet need at Reading Borough following a Memorandum of Understanding between the Council's. This is covered in greater detail in Section 3 of these representations.</p> <p>The principle of a comprehensive LPR is supported. We do however request that the Council provide greater clarity as to the extent of the Review in dealing with a strategy for housing delivery in the short to medium term. It is not understood whether the Scope of this LPR is to identify non-strategic sites as well as strategic sites. In order to be considered positively prepared in the context of the NPPF paragraph 182 the Council should provide a clear strategy to meet OAHN. The NPPF paragraph 47 requires local planning authorities to:</p> <p><i>"Identify and update annually a supply of specific deliverable sites sufficient to provide five years' worth of housing with an additional buffer of 5%... and... identify a supply of specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15."</i></p>

Respondent	Response
	<p>This LPR should therefore include a housing trajectory identifying a range of suitable strategic and non-strategic sites for housing delivery across the whole of the plan period. This should account for the cumulated under delivery to date and the uplift in OAHN in the short term. These points are covered in more detail in Section 3.</p> <p>Through the LPR housing trajectory and delivery strategy, the Council will also need account for a sufficient buffer to boost housing supply and ensure that there is a robust strategy in place to deal with any potential delays to the plan being adopted.</p> <p>The Council's Local Development Scheme anticipates adoption in November 2020 meaning the plan period will have only fifteen years to run (up to 2036). Any unforeseen delays to adoption would risk the LPR not being considered positively prepared in the context of the NPPF, as emerging updates to the NPPF require <i>“strategic policies to look ahead to a minimum 15 year period from adoption to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”</i>.</p> <p>We therefore support the Council's intentions to undertake a comprehensive Review of the Local Plan however urge the Council to ensure there is a sufficiently robust housing delivery strategy in place to account for any unforeseen setbacks to the timescales for adoption.</p>
Pegasus Planning Group for Donnington New Homes	<p><i>Response relates to land adjacent to Land at Smitham Bridge Road, Hungerford</i></p> <p>Yes – the proposed scope of the review is wide ranging, and covers all relevant areas. It will ensure that the Local Plan to 2036 is consistent with national policy, especially now that the Draft Revised NPPF has been released for consultation. It will also allow the alteration and addition of polices where it is considered necessary.</p>
Pegasus Planning Group for Donnington New Homes	<p><i>relates to land adjacent to Long Lane, Newbury</i></p> <p>Yes – the proposed scope of the review is wide ranging, and covers all relevant areas. It will ensure that the Local Plan to 2036 is consistent with national policy, especially now that the Draft Revised NPPF has been released for consultation. It will also allow the alteration and addition of polices where it is considered necessary.</p>
Pegasus Planning Group for Wasing Park Estate	<p>Paragraph 3.2 confirms that the scope of the review will involve a review of the adopted DPD policies to ensure consistency with national policy, and the introduction of new policies in response to recent changes in national planning policy and guidance. The Local Plan Review will need to align with and take account of the Draft Revised National Planning Policy Framework (NPPF) which is currently out for consultation.</p>
Pro Vision for Rivar	<p>The Scope and Content of the Local Plan Review will need to be comprehensively reviewed (and therefore subjected to further consultation) in the light of the revisions to the NPPF and PPG. In particular, consideration will need to be given to matters such as:</p> <ul style="list-style-type: none"> <li>• The determination of housing need. This will need to be based on the Standardised Methodology. The Plan should however recognise that this establishes the minimum number of houses needed. n circumstances where the standardised methodology produces an annualised need which is lower than past levels of housing provision (as may be the case), and mindful of the Government's objective of significantly boosting the supply of housing, consideration should</li> </ul>

Respondent	Response
	<p>be given to adopting a higher figure, having regard to, inter alia, market signals.</p> <ul style="list-style-type: none"> <li>• Viability Assessment. The Plan will need to be informed by an assessment of viability to ensure that the burden of developer contributions and affordable housing is not of a scale that will make development unviable.</li> <li>• There will need to be a clear distinction between Strategic and Local Policies. To achieve this, consideration should be given to preparing two separate Plans, albeit in parallel and co-terminus.</li> <li>• Small Sites. The draft NPPF requires that at least 20% of sites identified for housing in the Plan should be small sites of less than 0.5ha, to assist with early delivery, achieving a good mix of sites and supporting small and medium housebuilders (such as Rivar).</li> <li>• Rural housing. The Plan will need to identify opportunities for villages to grow and thrive.</li> </ul> <p>Rivar are concerned that a new settlement south of Junction 11 of the M4 would undermine the delivery of the well-established spatial strategy of distributing growth to support the existing settlement hierarchy. That strategy remains the most appropriate. The new settlement option appears to be being justified on the grounds that it would accommodate a substantial proportion of the housing need of neighbouring authorities (albeit within the same broadly defined Housing Market Area). In our view such an approach is contrary to the draft NPPF which makes it clear that cross border strategic matters should deal with housing requirements and distribution that cannot be met in neighbouring areas. There is no evidence that the scale of development contemplated south of Junction 11 cannot be accommodated elsewhere within West Berkshire and the neighbouring local authority areas.</p> <p>Plan period. The Plan is not programmed to be adopted before the end of 2020. It is, based on past performance, very likely to be later. 15 years is the minimum period a LPA should plan for. Therefore, consideration should be given to adopting a plan end date of 2041.</p>
Pro Vision for Audley Group	Audley Group supports the review of the Local Plan and comments under other questions about the scope of the review.
Pro Vision for Rootes Trustees	<p>The Scope and Content of the Local Plan Review will need to be comprehensively reviewed (and therefore subjected to further consultation) in the light of the revisions to the NPPF and PPG. In particular, consideration will need to be given to matters such as:</p> <ul style="list-style-type: none"> <li>• The determination of housing need. This will need to be based on the Standardised Methodology. The Plan should however recognise that this establishes the minimum number of houses needed. In circumstances where the standardised methodology produces an annualised need which is lower than past levels of housing provision (as may be the case), and mindful of the Government's objective of significantly boosting the supply of housing, consideration should be given to adopting a higher figure, having regard to, inter alia, market signals.</li> <li>• Viability Assessment. The Plan will need to be informed by an assessment of viability to ensure that the burden of developer contributions and affordable housing is not of a scale that will make development unviable.</li> <li>• There will need to be a clear distinction between Strategic and Local Policies. To achieve this, consideration should be given to preparing two separate Plans, albeit in parallel and co-terminus.</li> <li>• Small Sites. The draft NPPF requires that at least 20% of sites identified for housing in the Plan should be small sites of</li> </ul>

Respondent	Response
	<p>less than O.Sha, to assist with early delivery, achieving a good mix of sites and supporting small and medium developers.</p> <ul style="list-style-type: none"> <li>• Rural housing. The Plan will need to identify opportunities for villages to grow and thrive.</li> </ul> <p>The Rootes Trustees are concerned that a new settlement south of Junction 11 of the M4 would undermine the delivery of the well-established spatial strategy of distributing growth to support the existing settlement hierarchy. That strategy remains the most appropriate. The new settlement option appears to be being justified on the grounds that it would accommodate a substantial proportion of the housing need of neighbouring authorities (albeit within the same broadly defined Housing Market Area). In our view such an approach is contrary to the draft NPPF which makes it clear that cross border strategic matters should deal with housing requirements and distribution that cannot be met in neighbouring areas. There is no evidence that the scale of development be contemplated south of Junction 11 cannot be accommodated elsewhere within West Berkshire and the neighbouring local authority areas.</p> <p>Plan period. The Plan is not programmed to be adopted before the end of 2020. It is, based on past performance, very likely to be later. 15 years is the minimum period a LPA should plan for. Therefore, consideration should be given to adopting a plan end date of 2041.</p>
Pro Vision for Greenham Trust	<p>These representations are made by Pro Vision on behalf of the Greenham Trust Ltd (the Trust). The Trust owns Greenham Business Park as well as other property within West Berkshire and the neighbouring districts. It is a charitable organisation, with profits being used to support good causes throughout the region. It is, therefore, a key local stakeholder and will be keen to engage with further stages of the review process.</p> <p>The Trust generally supports the scope of the Local Plan Review and makes more specific comments in response to the proceeding consultation questions.</p>
Provision for Cala Group and Wates Developments	<p>The Scope and Content of the Local Plan Review will need to be comprehensively reviewed (and therefore subjected to further consultation) in the light of the revisions to the NPPF and PPG. In particular, consideration will need to be given to matters such as:</p> <ul style="list-style-type: none"> <li>• The determination of housing need. This will need to be based on the Standardised Methodology. The Plan should however recognise that this establishes the minimum number of houses needed. In circumstances where the standardised methodology produces an annualised need which is lower than past levels of housing provision (as may be the case), and mindful of the Government's objective of significantly boosting the supply of housing, consideration should be given to adopting a higher figure, having regard to, inter alia, market signals.</li> <li>• Viability Assessment. The Plan will need to be informed by an assessment of viability to ensure that the burden of developer contributions and affordable housing is not of a scale that will make development unviable.</li> <li>• There will need to be a clear distinction between Strategic and Local Policies. To achieve this, consideration should be given to preparing two separate Plans, albeit in parallel and co-terminus.</li> <li>• Small Sites. The draft NPPF requires that at least 20% of sites identified for housing in the Plan should be small sites of less than O.Sha, to assist with early delivery, achieving a good mix of sites and supporting small and medium developers.</li> <li>• Rural housing. The Plan will need to identify opportunities for villages to grow and thrive.</li> </ul>

Respondent	Response
	<p>CALA Homes and Wates Developments are concerned that a new settlement south of Junction 11 of the M4 would undermine the delivery of the well-established spatial strategy of distributing growth to support the existing settlement hierarchy. That strategy remains the most appropriate. The new settlement option appears to be being justified on the grounds that it would accommodate a substantial proportion of the housing need of neighbouring authorities (albeit within the same broadly defined Housing Market Area). In our view such an approach is contrary to the draft NPPF which makes it clear that cross border strategic matters should deal with housing requirements and distribution that cannot be met in neighbouring areas. There is no evidence that the scale of development be contemplated south of Junction 11 cannot be accommodated elsewhere within West Berkshire and the neighbouring local authority areas.</p> <p>Plan period. The Plan is not programmed to be adopted before the end of 2020. It is, based on past performance, very likely to be later. 15 years is the minimum period a LPA should plan for. Therefore, consideration should be given to adopting a plan end date of 2041.</p>
Tetlow King Planning for Rentplus UK	<p>We represent Rentplus UK Ltd, an innovative company providing affordable rent to buy housing for working people aspiring to home ownership with an accessible route to achieve their dream through the rent - save - own model. The Rentplus model addresses the primary barrier to home ownership – the lack of a mortgage deposit – through a combination of a secure rented period at an affordable rent (whichever is the lower of 80% of open market rent, including any service charge, or Local Housing Allowance), giving time to save, and a 10% gifted deposit to enable tenants to buy their own home in 5, 10, 15 or 20 years. In this way it extends the opportunity of home ownership to families who are otherwise unable to afford it and to do so within a timeframe to suit their circumstances.</p> <p>We agree with the proposed scope of the Review.</p>
Thakeham Homes	<p>Thakeham are a housebuilder based in Sussex, with a proven track record of delivering high quality, sustainable schemes across Surrey, Sussex and Hampshire.</p> <p>We wish to make representations based on the duty of West Berkshire to cooperate with neighbouring authorities to meet the housing need within the HMA. The draft plan fails to demonstrate how it will meet the Objectively Assessed Need (OAN) within the HMA and the Government standardised methodology figure and we consider that the plan cannot be considered sound until such times as this duty has been satisfactorily discharged.</p> <p>Duty to Cooperate</p> <p>The National Planning Policy Framework (NPPF) duty to cooperate requires that Local Planning Authorities (LPAs) demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts, including the delivery of housing development to meet the full OAN for the area:</p> <p>“Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development.” NPPF 2012, Paragraph 181</p>

Respondent	Response
	<p>The NPPF requires Local Plans to seek to deliver “the unmet requirements of neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development” NPPF 2012, Paragraph 182</p> <p>We support the Council in its efforts to collaborate with other authorities in the Western Berkshire Housing Market Area (Bracknell Forest Borough Council, Reading Borough Council and Wokingham Borough Council).</p> <p>We note that the Council in conjunction with the authorities mentioned above have produced the West of Berkshire Spatial Planning Framework (December, 2016). The report notes that Berkshire Strategic Housing Market Assessment identifies that between 2013 and 2016 the area needs to deliver in the region of 65,665 new dwellings to deal with population growth, affordability, market factors, sustaining and improving economic growth and the impact of the continued growth of London. This means finding land for just under 3,000 homes per year’.</p> <p>Although the Spatial Planning Framework has acknowledged there are cross border issues there is no clear strategy on how to overcome the issues. Therefore, as the Local Plan progresses we would expect to see further cooperation and positive engagement between the Council and neighbouring authorities to ensure that a clear and transparent housing strategy, supported by a robust evidence base has been agreed between parties, detailing how the identified OAN for the HMA will be met and how any unmet need across the HMA will be addressed in full. This is encouraged further by the proposed introduction of the requirement in the NPPF for local planning authorities within a housing market area to produce a Statement of Common Ground as set out in the Government’s recent consultation document.</p> <p>The current Spatial Strategy outlined in Policy CS1 in the Core Strategy provides a housing figure of at least 10,500 net additional dwellings and associated infrastructure over the period 2006 – 2026 (525 dpa). However, the Berkshire SHMA (2016) provides an OAN figure of 665 dpa between 2013 and 2036 which is in line with the Government’s Standardised methodology figure. Although this figure cannot be applied retrospectively, it does mean that the Local Plan Review will need to be based on the standardised methodology, which has been brought into the draft revised NPPF (March 2018) as a statement of intent for its introduction in Spring 2018. Therefore, as the plan progresses we would expect to see a higher OAN for the District which would be in line with the Government’s objective.</p> <p>It is essential that the emerging Local Plan acknowledges the Government’s ambitions to significantly boost the supply of housing and seek to deliver the full housing requirement of the district to comply with national policy, particularly paragraph 47 of the NPPF.</p> <p>We fully support the steps that the Council has already taken to engage in initial discussions with neighbouring authorities. As the plan progresses we would expect to see further co-operation between the authorities in relation to housing on an on-going basis in order to ensure that the duty to cooperate has been sufficiently discharged.</p>
Turley for Commercial Estates Group	It is considered that this high-level scope is broadly appropriate and we would stress the necessity for the Local Plan Review to be comprehensive and supported by extensive new evidence.
Turley for Berfeld	We do not agree with paragraph 3.3. The scope of the Local Plan Review is broad and wide-ranging. The Council’s current Development Plan is based on the Core Strategy that was prepared prior to the introduction of the National Planning Policy Framework in March 2012. It is therefore appropriate to give this Local Plan review the broadest possible

Respondent	Response
	<p>basis for reviewing existing policies to ensure that they are in accordance with current and emerging national policy and guidance, and other evidence based documents that should rightfully inform the Local Plan.</p> <p>With this in mind, it may well be necessary to change or remove policies however they currently accord with national policy as national policy is currently undergoing significant change. The Council should not restrict itself unnecessarily at this stage of their Local Plan review.</p>
Turley for A2dominion Housing Group	<p>We are writing on behalf of A2 Dominion, who has land interests within Streatley in West Berkshire. These representations seek to respond to the Local Plan Review Scoping Report and Sustainability Appraisal Scoping Report consultation to assist in the evolution of the new Local Plan. In particular these representations address the role of Streatley in the settlement hierarchy.</p> <p>Streatley is not specifically identified within the settlement hierarchy for the District (albeit benefits from a settlement boundary) as defined by Policy ADPP1 of the Core Strategy despite the evident opportunities for the delivery of sustainable development discussed below. We consider that the role of Streatley should be explored further in order to understand the opportunities that it provides to contribute towards meeting the projected housing needs to 2036.</p> <p>The adopted Development Plan was based upon the adopted/ emerging planning context at the time of its preparation and the associated evidence base to support the spatial strategy. As the emerging Local Plan progresses, some of the evidence base which underpinned the Core Strategy and Housing Site Allocations DPD will be at least 10 years old and cannot be considered transferable to considering the spatial strategy to 2036. The evidence base needs to be re-visited to ensure that the new Local Plan is positively prepared and based on the most appropriate strategy (paragraph 182 of the Framework). This is particularly relevant given the Inspector's Report to the Core Strategy acknowledges that at the time of adoption the Plan was not meeting the full OAN for the District and that an early review would be required. This reinforces the need for WBC to update the evidence base to inform the spatial objectives between 2026 -2036 and consider both its own housing needs and those of the wider Housing Market Area to which the District has strong functional relationships through the Duty-to-Cooperate.</p> <p>It is considered necessary to review all policies contained within the adopted Development Plan to ensure both consistency with national policy and that they will remain applicable to shaping and guiding development to 2036 in accordance with paragraph 154 of the Framework.</p> <ul style="list-style-type: none"> <li>• The introduction of additional development management policies in response to the review of the saved development management policies not replaced by the Core Strategy or the Housing Site Allocations DPD</li> </ul> <p>Given a number of the Local Plan policies (2001-2006) have been saved since 2006 and form part of the adopted Development Plan, these policies need to be reviewed as part of the new Local Plan given they were only originally intended for the period to 2006. All these saved policies should be replaced as part of the new Local Plan.</p> <ul style="list-style-type: none"> <li>• The introduction of new policies in response to recent changes in national planning policy and guidance</li> </ul> <p>WBC need to ensure that any implications on the plan making process and the preparation of associated policies arising from the changes to national planning policy and guidance are fully considered at the appropriate time.</p>

Respondent	Response
Turley for North East Thatcham Consortium	<p>The North East Thatcham Consortium comprises A2Dominion; Donnington New Homes, Ptarmigan and Gully Farm and these representations are made jointly and severally on behalf of the Consortium members.</p> <p>The Consortium generally agrees with the Council's proposed scope of the Local Plan Review for the following reasons and subject to the following comments.</p> <ul style="list-style-type: none"> <li>• <i>A review of the existing Core Strategy strategic objectives</i></li> </ul> <p>The Core Strategy was adopted in 2012 based upon the existing and emerging planning policy context at the time. Furthermore, in a number of cases, the evidence upon which Core Strategy was based was prepared some time before its adoption. By the time the Local Plan Review progresses, parts of the evidence base which underpinned the Core Strategy will be at least 10 years old. Furthermore, by the time the Local Plan Review progresses, the national planning policy context will have shifted. The Core Strategy was adopted shortly after the publication of the National Planning Policy Framework in 2012, whereas the revised National Planning Policy Framework (currently published for consultation in draft) is expected to be in place later in 2018.</p> <p>With regards to the planned provision for housing it is evident from the Core Strategy Inspector's Report that the Core Strategy did not meet the full objectively assessed need in West Berkshire (para 41. The Inspector also anticipated the need for an early review of housing provision on the basis of updated evidence of housing need which accounted for needs in full across the Housing Market Area (HMA) within which West Berkshire is located.</p> <p>It is therefore fundamental that the strategic objectives contained in the Core Strategy (paragraph 3.8) are reviewed in order to ensure that the objectives of the Local Plan Review are able to respond to updated evidence and shifts in national planning policy.</p> <p>It is also essential that the Core Strategy strategic objectives are reviewed as they relate to the Core Strategy plan period (2006 – 2026). In contrast the Local Plan Review will need to plan for at least 15 years from its adoption and at present is proposed to cover the period to 2036. On that basis, the strategic objectives set out in the Local Plan Review will need to be capable of responding to updated evidence regarding the period to 2026 as well as the period between 2026 and 2036. This will be particularly relevant to the Core Strategy objective on Housing Growth (strategic objective 2) which relates to the delivery of "at least 10,500 homes across West Berkshire between 2006 – 2026." It is of note that the latest published Strategic Housing Market Assessment (SHMA) for West Berkshire identifies a need for 665 new dwellings a year on average for the period 2013 to 2036. This equates to a total need for in excess of 15,000 dwellings and represents a level of need which notably exceeds that currently provided for within the Core Strategy. The SHMA identifies a considerably greater need across the Western Berkshire HMA (the administrative areas of West Berkshire, Reading, Wokingham and Bracknell Forest), with some 2,855 homes per annum identified as being needed over the same period (over 65,000 homes in total).</p> <p>The Local Plan Review must take full account of the significant scale of identified housing need in the authority and across the area with which it shares strong housing market relationships.</p> <ul style="list-style-type: none"> <li>• <i>A review of the existing spatial strategy for the District</i></li> </ul>

Respondent	Response
	<p>The Consortium considers that it is reasonable for the preparation of the Local Plan Review to include a review of the existing spatial strategy for the District (section 4 of the Core Strategy) to ensure that this reflects the most recent evidence and national planning policy.</p> <ul style="list-style-type: none"> <li><i>A review of all the existing Core Strategy and Housing Site Allocations DPD policies to ensure their continued consistency with national policy</i></li> </ul> <p>The Consortium considers that it is reasonable to review of all the existing Core Strategy and Housing Site Allocations DPD policies to ensure their continued consistency with national policy as part of the Local Plan Review. The Consortium considers that it is essential that this review is undertaken in relation to the policies and appendices of the Local Plan 1991 – 2006 (adopted 2004) which the Council continues to apply for the reasons explained below.</p> <ul style="list-style-type: none"> <li><i>The introduction of additional development management policies in response to the review of the saved development management policies not replaced by the Core Strategy or the Housing Site Allocations DPD</i></li> </ul> <p>The Council's website (<a href="http://info.westberks.gov.uk/article/28783">http://info.westberks.gov.uk/article/28783</a>) suggests that 23 policies and 5 appendices of the Local Plan 1991 – 2006 continue to be applied. Those policies were only intended to be used in relation to the period to 2006 and the Consortium considers that much will have changed (both in circumstance and evidence) since those policies were prepared.</p> <p>The Consortium therefore considers that it is essential that the preparation of the Local Plan Review includes an assessment of all of the parts of the Local Plan 1991 – 2006 which the Council continues to apply. This assessment should consider the extent to which the policies or appendices are necessary, justified by evidence and fit for purpose in a plan period which extends to 2036.</p> <p>Furthermore, the Consortium considers that the Local Plan Review should be used as an opportunity to replace any remaining parts of the Local Plan 1991 – 2006 which the Council continues to apply. Should that not occur then this could lead to a situation where development being determined in 2036 is to have regard to policies adopted more than 30 years ago in 2004. This is not considered to represent an effective strategy.</p> <p>The Local Plan Review should replace all of the retained policies of the Local Plan 1991 – 2006 in order to provide an up to date, transparent, effective and easily accessible planning policy context in West Berkshire.</p> <ul style="list-style-type: none"> <li><i>The introduction of new policies in response to recent changes in national planning policy and guidance</i></li> </ul> <p>The Consortium considers that it is reasonable for the Local Plan Review to be prepared on the basis that new policies may be included in response to changes in national planning policy and guidance.</p>
Joy Schlaudraff	<p>Yes, definitely.</p> <p>The planning system, though there for control, which is good, is too bureaucratic and needs to be simpler, for simple applications, to make them as easy as possible for both council and applicant.</p> <p>There should be some system, which identifies ANY and ALL land which can, or could, be built on, at some time, so that there is less uncertainty and money-making in the whole thing.</p>

Respondent	Response
	<p>The system needs to be enabled, so that people wanting to develop their land can be given simple free information, as to where on their land the council would be happy to consider housing or other development. The information should be volunteered from the council, not the other way about.</p> <p>This would end all the unnecessary waiting and expense, and enable development in general, albeit under the control of the council. Which is right.</p>
West Waddy for Gerald Palmer Eling Trust	<p>Yes. Paragraph 3.1 states that <i>'the review will be wide ranging.'</i> This is supported. In particular, it is important that the review includes the settlement boundaries which have not been reviewed since they were defined on the West Berkshire Local Plan 1991- 2006 Proposals Map. These boundaries are therefore seriously out of date and need reviewing to enable sufficient development to take place in rural areas to satisfy local housing need. The settlement boundary review is also required to make the new Local Plan consistent with the National Planning Policy Framework (NPPF) which emphasises the importance of maintaining the vitality of rural communities, (NPPF para 17 &amp; 55). Indeed, this is further emphasised in the proposed revisions to the NPPF, issued for consultation in March 2018, which state that <i>'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services,'</i> (NPPF Proposed revisions para 80). To enable this to happen it is essential that the settlement boundaries of rural communities are reviewed.</p> <p>There is also a long standing Council commitment to review settlement boundaries. Paragraph 2.42 of the Core Strategy adopted in July 2012, stated that: <i>'The Core Strategy will be followed by a Site Allocations Development Plan Document. This will include details of any additional housing allocations, reviews of settlement and town centre boundaries, plus policies for development management.'</i> The subsequent Site Allocations DPD also contained a commitment that: <i>'all settlement boundaries, including those below the settlement hierarchy, will be reviewed through the new Local Plan,'</i> (para 1.35).</p> <p>There is, therefore, now a pressing need for settlement boundaries to be reviewed in order to bring them up to date; to enable sufficient housing to be provided in rural areas; to accord with Government policy and to comply with the Council's previous commitments.</p>
Woolf Bond Planning for Donnington New Homes	<p>National Planning Policy Framework (NPPF) and the Tests of Soundness</p> <p>The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be "sound" a Development Plan Document ('DPD') should be <u>positively prepared</u>, <u>justified</u>, <u>effective</u> and <u>consistent with national policy</u>.</p> <p>In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable, flexible and be able to be monitored. The positive preparation test requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.</p> <p>For the reasons set out in this paper there are a number of potential matters that we recommend are addressed in future iterations of the emerging Plan.</p>

Respondent	Response
	<p>We agree with the proposed scope of the Local Plan review. It acknowledges the need to review the Council's housing requirement and spatial strategy, development management policies and existing settlement boundaries consistent with the requirements of existing and emerging national planning policy.</p>
<p>Woolf Bond Planning for Donnington New Homes</p>	<p>Our client's interests relate to land located at Copyhold Farm, Kiln Drive, Curridge. The site extends to a total 4.16ha and is suitable for housing development comprising up to approximately 125 no. dwellings in a location adjoining the settlement of Curridge. The site is of a size such that it could also be supported by community uses such as public open space, a children's play area or allotments. The site is an available, suitable and deliverable site, with no constraints to bringing the land forward for development at an early stage during the emerging plan period. A Site Location Plan is submitted in support of these representations, alongside the requisite form.</p> <p>The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be "sound" a Development Plan Document ('DPD') should be <u>positively prepared, justified, effective and consistent with national policy.</u></p> <p>In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable, flexible and be able to be monitored. The positive preparation test requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.</p> <p>For the reasons set out in this paper there are a number of potential matters that we recommend are addressed in future iterations of the emerging Plan.</p> <p>We agree with the proposed scope of the Local Plan review. It acknowledges the need to review the Council's housing requirement and spatial strategy, development management policies and existing settlement boundaries consistent with the requirements of existing and emerging national planning policy.</p>
<p>Woolf Bond Planning for JJP Land</p>	<p>The NPPF sets out the principal components to be included in local plans. Paragraph 182 requires that in order to be "sound" a Development Plan Document ('DPD') should be positively prepared, justified, effective and consistent with national policy.</p> <p>In order to be justified the DPD must be founded upon a robust and credible evidence base and represent the most appropriate strategy when considered against the reasonable alternatives.</p> <p>Effective means the document must be deliverable, flexible and be able to be monitored. The positive preparation test requires plans to objectively assess development and infrastructure requirements from neighbouring authorities.</p> <p>For the reasons set out in this paper there are a number of potential matters that need to be addressed in future iterations of the emerging Plan.</p>

## Summary of responses

The majority of respondents agreed with the proposed scope of the Review and were clear in the need for it to be comprehensive and based on an up to date evidence base. They were also in agreement of the need to review the Council's housing requirement and spatial strategy, settlement hierarchy, development management policies and existing settlement boundaries consistent with the requirements of existing and emerging national planning policy.

There was a concern from a few respondents that the Scoping Report lacked sufficient evidence and context and that a further body of work should therefore be produced to enable more meaningful and constructive responses from stakeholders. The need for the Council to re-examine its approach once the revised NPPF and NPG were published was also stressed.

A number of respondents raised issues regarding the overall housing requirement for the Local Plan Review. Some planning agents noted that the current plan was not reflective of the most up to date evidence on housing need and felt a national policy compliant housing requirement is long overdue. The requirement to engage with other authorities both within and beyond the HMA was considered to have implications on future housing need. The need for a clear strategy to meet this need, with sufficient buffer to boost housing supply and ensure that there is a robust strategy to deal with any potential delays to the plan being adopted was expressed.

With regard to the standard methodology the comment was made that consideration should be given to adopting a higher figure, mindful of the government's objective of significantly boosting the supply of housing.

One respondent from the development industry requested the Council provide greater clarity as to the extent of the Review in dealing with a strategy for housing delivery in the short to medium term. They were not clear whether the scope of the Review was to identify non-strategic sites as well as strategic sites. Another respondent also emphasised the need for there to be a clear distinction between strategic and local policies and that in order to achieve this, consideration should be given to preparing two separate plans, albeit in parallel and co-terminus.

The issue of rural housing was raised, with respondents emphasising the need to identify opportunities for villages to grow and thrive.

One planning agent was making the case that a new settlement option would be contrary to the draft NPPF as cross border strategic matters should deal with the requirements and distribution that cannot be met in neighbouring areas, and there was no evidence that the scale of development contemplated south of Junction 11 could not be accommodated elsewhere within West Berkshire and the neighbouring local authority areas. The concern was that such an approach would undermine the delivery of the established spatial strategy of distributing growth to support the existing settlement hierarchy.

Support for a mix of sites to assist delivery in the short, medium and long term was expressed with smaller sites supported to offer product diversity and to involve smaller builders and developers.

The requirement for a minimum 15 year period from adoption was raised as an issue with regard to the end date of the Local Plan Review. As the Review is not anticipated to be adopted before the end of 2020 it was felt that consideration should be should be given to adopting a plan with an end date of 2041 rather than 2036.

Some respondents highlighted specific concerns within their remit that will be considered further as the Review progresses and which will be taken forward through the development of particular policies such as the needs of the racehorse and equestrian industry. Some statutory consultees also drew attention to various

requirements and other guidance that will need to be considered as the Review progresses. One parish council expressed its disappointment that there was no real emphasis on likely changes to the way that people live their lives and their changing aspirations such as the impact that electric and possibly autonomous vehicles may have.

## **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR). Detailed comments made will be taken forward in the development of the spatial strategy and both strategic and local policies as appropriate.

It is encouraging to see that there is general agreement with the proposed scope of the Review. The importance of an adequate, up to date and relevant evidence base is acknowledged as is the need to undertake the LPR in close cooperation with our neighbouring authorities.

The Council will need to prepare the Review to conform to the revised national policy in the NPPF published on 24th July 2018.

The draft Strategic Objectives included in the Scoping Report have been reviewed in light of the responses received and changes will be made where appropriate. It is agreed that the inclusion of an overall Vision would help set the context for the Review.

The objective on housing is to ensure that the assessed need for market and affordable housing up to 2036 will be met. Housing need will be assessed using the government's standard method contained in the revised NPPF and PPG. This assessment will use the most up to date household projections as a starting point and the resultant need figure is considered to represent the minimum requirement to be included within the Local Plan Review to 2036. This figure will supersede the OAN in the 2016 Berkshire SHMA. The LPR will set out the strategy to meet this revised requirement. It will consider both strategic and non-strategic growth opportunities to meet the need over the plan period, including housing in rural areas of the District. The HELAA will provide evidence of growth opportunities in the area and will identify sites that have potential for development to inform the spatial strategy. Most of the sites that will be included were submitted through the Call for Sites (December 2016 to March 2017), through which agents and the public were invited to submit sites that they considered developable.

The LPR will contain a housing trajectory as required by national policy, although a trajectory can only represent a point in time and will be subject to review through the Annual Monitoring Report.

The Housing Site Allocations DPD reviewed the settlement boundaries of settlements within the settlement hierarchy. It is intended that all settlement boundaries are reviewed as part of the Local Plan Review. This will also include a review of the settlement boundary criteria.

## Responses received to the Local Plan Review Scoping Report (February 2018)

**Q2: Do you agree with the draft strategic objectives we have identified in Appendix 1? If not please tell us why and give reasons for your answer.**

Number of responses received: 56

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Respondent	Response
<b>Internal</b>	
Archaeology Team West Berkshire Council	<p>We feel that Objective 6 Culture and 7 Heritage lack clarity – they seem to overlap but it’s not clear what Culture is or what heritage is. Suggested wording as regards the archaeology service’s mission statement - <i>Protecting, preserving and promoting West Berkshire’s historic environment resource for the benefit of those who live, work and visit here.</i></p> <p>Culture Manager ... suggests these draft objectives:</p> <p><b>6. Culture</b> To promote culture (the arts in all forms and including library services) as fundamental to improved well-being and a thriving and sustainable local economy (including the visitor economy).</p> <p><b>7. Heritage</b> To promote the understanding, preservation and presentation of West Berkshire’s historic landscape and archaeological resource for people who live in, work in and visit West Berkshire.</p>
Public Transport Team West Berkshire Council	<p>I broadly agree with the Draft Strategic Objectives identified in Appendix 1, although in respect of:</p> <p>Objective 4 Economy, I would request this be amended to read:</p> <p>“To facilitate and support a strong, diverse and sustainable economic base across the District, including through the designation of land in accessible locations for employment purposes to allow provision of suitable workplaces and in turn fostering a range of local job opportunities.”</p> <p>Objective 5, I would request this be amended to read:</p>

Respondent	Response
	<p>“To enhance the accessibility, vitality and viability of town, district and local centres in West Berkshire as places for shopping, leisure and community activities, coupled with employment commensurate with the size and nature of the established settlement.”</p>
Minerals and Waste Team West Berkshire Council	<p>1. <i>Climate Change</i> Climate change appears to have been narrowly interpreted to include only policy relating to flooding. However, it may be more appropriate to consider a wider interpretation of climate change in policy, including such as in policy CS15 (i.e. greenhouse gas emissions), and as has been done in the Minerals and Waste Local Plan (Policy 25 – Climate Change).</p> <p>3. <i>Sustainable and Quality Development</i> The minerals and waste team supports the intent to clarify linkages with these policies and the Minerals and Waste Local Plan going forward (it is suggested the most applicable policy in the Minerals and Waste Local Plan with which to make linkages is Policy 26 – Public Health, Environment and Amenity). It is important that both plans are consistent in their approach to policy issues for the application of policy in decision making.</p> <p>4. <i>Environment</i> Draft policy 8 in the Minerals and Waste Local Plan Preferred Options would, in part, seek to safeguard potential, planned and existing minerals associated infrastructure, including rail sites from non-mineral development. Other types of development which require a rail to road link would not be safeguarded under this draft policy. Therefore, as is indicated in the Scoping Report, further consideration would be required as to whether safeguarding of the non-minerals infrastructure is required and how this would be achieved in policy terms.</p> <p>7. <i>Heritage</i> and 9. <i>Transport</i> It is suggested that the Local Plan should also consider clarifying linkages with these policies and the corresponding policies in the Minerals and Waste Local Plan (Biodiversity and Geodiversity, Landscape, Protected Landscapes, Historic Environment and Transport and Flooding) going forward. It is important that both plans are consistent in their approach to policy issues for the application of policy in decision making.</p>
<b>Statutory consultees</b>	
Hampshire County Council	We agree with the draft strategic objectives.
Bracknell Forest Borough Council	We welcome Objective 2 Housing ‘ <i>Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District.</i>

Respondent	Response
Wiltshire Council	<p>Thank you for consulting Wiltshire Council on your Local Plan Review Scoping Report and SA Scoping Report.</p> <p>We welcome the objective included in your Local Plan Review Scoping Report to meet your objectively assessed need over the Western Berkshire Housing Market Area.</p> <p>As we have a cross boundary relationship it is encouraging to see that the Wiltshire Core Strategy and Minerals and Waste Core Strategies are included in the PPP section of your SA Scoping Report.</p> <p>As you are aware, we are also reviewing our Local Plan. We agree that the preparation of our Local Plans will require close liaison and continued consultation as details emerge, especially as we share cross boundary features such as the North Wessex Downs AONB, the Kennet &amp; Avon Canal and the A4.</p> <p>At this stage we have no further comments to make. Please continue to keep us informed of your plans progress.</p>
Newbury Town Council	<p>Our principal comments relate to the Strategic Objectives in the Scoping Report. The numbering is ours, and does not indicate priority.</p> <ol style="list-style-type: none"> <li>1. We appreciate the need to meet so far as possible the housing development targets set by the Strategic Housing Market Assessment. We fully support the objectives for affordable and social housing. However, the latter objectives will require firm action by the Planning Authority, for which the support of the Inspectorate will be necessary and should be sought.</li> <li>2. Particular attention is needed to the housing requirements of key workers, for whom suitable housing types and tenures should be devised and constructed.</li> <li>3. West Berkshire Council has standards for parking and amenity space for houses, but not living space. In consequence, some spatially very limited accommodation is being put forward by developers. Is this desirable? The only relevant Strategic Objective refers vaguely to “Sustainable and Quality Development”. The Local Plan should have some perspective on the matter, perhaps with reference to the rules for public accommodation drawn up some years ago in London, or some other criteria. See <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/524531/160519_Nationally_Described_Space_Standard____Final_Web_version.pdf</a>.</li> <li>4. We welcome the objective to provide additional employment land. However, further measures will be needed to encourage new businesses, enable existing businesses to grow, and attract new businesses from outside. A list of steps to this effect is described in the Town Plan, but in summary, they include additional employment land, flexible rental and</li> </ol>

Respondent	Response
	<p>planning terms (for example by a Local Development Order), provision of Incubation Hubs and Accelerator Hubs, and integration with the higher education institutions in West Berkshire. Given such measures, West Berkshire can benefit from the substantial opportunities represented by the Oxford-Cambridge Corridor and the Smart City Cluster.</p> <p>5. Addressing these opportunities will require greater focus on business development than West Berkshire Council appears to deploy at present. Business development actions previously identified in the Newbury Vision have not been implemented. We suggest that the Strategic Objective “Economy” should be rephrased “Business Development”. We recommend that WBC employs more resources to deliver these opportunities, and that the activities of the Executive in this regard are more widely communicated than at present.</p> <p>6. Whatever Local Plan is approved, it can at present be overridden by Permitted Development Rights on commercial property. Unremitting pressure should be exercised through political channels to secure the reversal of this disruptive Government policy. The Government has advised that the remedy of an Article 4 Direction is available and not burdensome; we recommend that whether this is in fact the case is tested by the Planning Authority.</p> <p>7. At present, the policy and planning effort of West Berkshire Council is focussed overwhelmingly on housing development, and in responding to proposals from developers for housing. The infrastructure implications are relegated to a separate plan. We do not agree. Spatial planning for infrastructure should occur at the same priority as for housing and business, and should therefore be part of the Local Plan itself, as otherwise the housing allocation will crowd out other requirements. These include extension of:</p> <ul style="list-style-type: none"> <li>• primary, secondary and higher education;</li> <li>• public open space;</li> <li>• medical services;</li> <li>• age support, in particular day care centres and care homes;</li> <li>• road and rail transport links;</li> <li>• cultural, leisure and sporting facilities.</li> </ul> <p>8. Given the population growth from new housing and the expected strong proportionate increase in the older population, the Local Plan should include an assessment of changes in population size and profile during the Plan period. Social infrastructure planning across the District should be based on those assessments.</p> <p>9. West Berkshire Council’s present support for leisure and culture is mainly limited to the assets which it owns directly. We recommend that an audit is carried out of the cultural, leisure, and sporting assets of the District, and a view on how they is developed, in order to prepare a policy for tourism. The absence of such a policy for West Berkshire has resulted in (for instance) lack of a policy for visitor information or for the tourist coach trade. Leisure, culture, and tourism are the</p>

Respondent	Response
	<p>second business interest of West Berkshire after commerce and industry. Officer support and Executive attention should in our submission be directed to developing them, in partnership with Town and Parish Councils.</p> <p>10. In the longer term, consideration should be given as whether West Berkshire should provide a hub or hubs for major cultural, leisure, and sporting events, by the provision of a major concert hall, conference venue, and/or sporting arena, together with the appropriate visitor accommodation. If so, space should be reserved accordingly.</p> <p>11. West Berkshire has a good record in providing and supporting public open spaces, in collaboration with Parish Councils, and in conditioning such space with major developments. However, it seems to us that the policy framework for this is unclear. How is such space, scattered across the District, to be protected? What steps are needed to ensure that they are all maintained to a common standard in the public interest?</p> <p>12. The Town Plan contains detailed proposals for development of road and rail transport, prepared after consultation with the portfolio holder for transport. In particular, we draw attention to the lack of a junction connecting the two north-south trunk roads through Newbury. We support West Berkshire Council's plans for pedestrian and cycle links and are prepared to provide funding and other resources to achieve them.</p> <p>13. The Town Plan's section on education was drawn up after consultation with the portfolio holder for education. We recommend involvement of business in a possible business-sponsored Free School and/or University Technical College. Vocational education should be developed according to the needs of local business. In addition, West Berkshire does not contain any institutions of University standard. To retain more young people for higher education in West Berkshire, we suggest that Universities in nearby cities be approached with the aim of locating one or more campuses or business schools in the District. Space should be reserved for these purposes.</p> <p>14. No Strategic Objectives are stated for the Environment, other than the mitigation of climate change. It is suggested that the Local Plan should include specific objectives for air and water quality and biodiversity, in which Parish Councils could have a principal role. Strategic Objectives should also be given for recycling, which is a West Berkshire Council function.</p> <p>15. We are largely content with West Berkshire Council's policies and actions on heritage. We would point out, however, that local listing is currently entirely dependent on volunteers, and contingency plans should be made in case the present arrangements should fail at some point.</p> <p>16. The Strategic Objectives make no reference to health and well-being, other than under the heading of Housing. As pointed out above, health and well-being have a consequence for spatial planning which should be considered. Health</p>

Respondent	Response
	<p>disparities and variations between areas and communities should be studied, and may well be found to have planning implications.</p> <p>17.The Strategic Objectives make no specific reference to the North Wessex Downs Area of Outstanding National Beauty. In the light of recent planning cases, we suggest that applications should be permitted on the AONB which support development of the rural economy and the personal amenity of current residents, as these pay for maintenance of the AONB in its present state. The present policy is too based on the premise that there should be no change.</p>
Streatley Parish Council	<p>Regarding the Strategic Objectives as outlined in Appendix 1, Streatley Parish Council agrees with them as being most appropriate. The only one we would recommend strengthening would be number 8: Green Infrastructure and Healthy Living. We believe it is increasingly important that our green environment receives even more protection than at present. The AONB is a very precious asset for the district and for future generations and should be enhanced rather than simply maintained as the NPPF requires.</p>
Thatcham Town Council	Yes
Holybrook Parish Council	<p>The draft strategic objectives, as identified in your appendix 1, are a good starting point and the Parish Council support, in particular sustainable development and green infrastructure. However, the draft objectives fail to adequately address some of the main issues faced by many of urban communities within the district. It is disappointing that general infrastructure has not been included as the existing structures are already at saturation point and this needs to be urgently addressed.</p>
Pangbourne Parish Council	<p>Suggest re-title of Climate Change and Sustainability:</p> <p>If these objectives are in order of importance, I would suggest that “Combating Climate Change” needs more context. As a small district authority seeking to combat a complex global problem, whatever WBC does in, for example, “minimising demand for energy”, (especially given its ambitious housing targets and residents’ heavy reliance on private transport) can never be more than the slightest pinprick in the hide of an elephant. It’s potentially more productive to focus on those issues where you can have an effect on the ground – which is why I would team this objective up with sustainability. The Sustainability Appraisal Scoping Report (pp17-22) succinctly summarises the key issues for WBC and the three other Councils in the West of Berkshire and offers a broad indication of how they should be approached, demonstrating how WBC and the other authorities can make a long-term contribution to combating climate change.</p> <p>Economy:</p> <p>This one should be next in priority order. A “strong, diverse and sustainable economic base” within easy reach of London is arguably the biggest single factor which has made the Thames Valley the prosperous and expanding area it is today.</p>

Respondent	Response
	<p>Sustaining this economic strength over the next twenty years, however, will not be easy. The bulk of new investment will remain in the service sector where some big structural and technological changes are currently in train. New retail investment is not an unmixed blessing in so far as it creates winners and losers – for example, the on-going decline of the Kennet Centre area in Newbury as the big brands have moved their focus to the other end of the town centre. Multiple retailing has now largely gone ex-growth in terms of job creation and the future will be dominated by the big on-line operators, albeit with opportunities for small specialists in suitable locations. Over the past decade economic insecurity has become a fact of life for many households – even in the Thames Valley – whether in the form of zero-hours contracts, premature retirement or below-inflation pay increases – all of which are affecting their spending decisions. The short term outlook for business and consumer spending is uncertain, which may well make it harder to attract the new investment we need to sustain our growth.</p> <p>Housing:</p> <p>A strong local economy tends to attract inward migration which affects the location, price and quality of the new homes and the infrastructure required to support development. According to the joint West of Berkshire Spatial Planning Framework, achieving the development targets for the four authorities in the Berkshire Strategic Housing Market Assessment over the period 2013 to 2036 means an additional 65,600 houses to be built, or nearly 3,000 a year, roughly one third of which will be built on land not yet allocated for development. The spin-off in new jobs and investment will obviously be very significant, but the underlying economy still needs to be strong. As a recent study by the IFS has concluded, “Areas seeing lots of new developments aren’t guaranteed strong economic growth. And growth doesn’t necessarily rely on large-scale property development.” The economy ultimately drives the property market, not vice versa.</p> <p>Town, district and local centres:</p> <p>While the exodus of banks and building societies has left a few gaps in these centres, a relatively high level of local business optimism has ensured that many are now occupied by small, specialist retailers whose main complaint is the burden of business rates. Contrary to popular belief, however, the IFS study quoted above concluded that there is no relationship between changes in local authorities’ business rates tax bases and local economic growth. The strength of the local economy is the main influence on the success of high street businesses.</p> <p>No comment on the remaining objectives.</p>
Stratfield Mortimer Parish Council	<p>It is understood that the draft strategic objectives are derived from many sources, some of which are effectively mandatory. As such they cannot be argued with. However, the wording of the draft objectives is not always very clear. For instance, what does ‘a strong network of multi-functional green infrastructure which provides benefits for health, the environment and enhances the overall quality of life of sustainable communities.’ actually mean? Rewording the objectives in plain English would make them more accessible.</p>

Respondent	Response
	<p>Additionally, but far more importantly, there seems to be no objective(s) which reach the heart of the matter as to what individuals are hoping the resulting policies and hence developments will deliver. What seems to be lacking is a sense of what West Berks will look like/feel like in 2036-50. If you do not have a dream how can you have a dream come true? If there was a vision element then the how and why of many of the more detailed elements becomes more obvious.</p> <p>As an example central government commissions a happiness survey each year and is committed to trying to increase the nation's happiness. Does not planning policy have a part to play in that? Perhaps more pertinently there is no mention of community in any of the objectives. Surely a spirit or sense of community underpins what makes a successful town, village or District. We suggest there should be one or more objectives focussing on that aspect of planning.</p> <p>There also seems to be no real recognition of health and wellbeing in the objectives. There is passing reference to healthy living in the context of green infrastructure but nothing more substantial than that. Surely the health of the residents of West Berks must be a major objective. This is especially so when there has been a marked change in policy in the recent past to now emphasise the 'joined up provision' of health and social care.</p> <p>As far as the individual draft objectives are concerned our comments are, (in addition to the request for more plain English):-</p> <p><b>1. Climate Change</b></p> <p>To mitigate and adapt to the effects of climate change and minimise demand for energy and other resources. This objective is very far reaching and could raise expectations beyond what is possible. For instance, taking this at face value, the blanket minimisation of energy demand could lead to the banning of all cars. As such we believe that a 'reasonableness' clause needs inserting.</p> <p><b>2. Housing</b></p> <p>Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District.</p> <p>This is an example of where future change is being considered but in rather a passive way. In reality what does responding to the changing demographic and health profile of the District really mean? If it means to provide more dwellings suitable for an ageing population, why not say so. Equally why not consider other coming changes as well as the ageing population?</p> <p><b>3. Sustainable and Quality Development</b></p> <p>To ensure provision of sustainable developments of high quality design, construction and efficiency (including land use) which contribute to an attractive, safe and accessible environment for all.</p>

Respondent	Response
	<p>We would very much support the general thrust of this objective and feel that its successful implementation could go a long way toward reconciling the need for more houses and the natural reluctance of existing residents to see their local environment altered for the worse.</p> <p>The phrase “ while using land efficiently with higher density housing” would be a lot clearer than ‘and efficiency (including land use)’.</p> <p>Many people will consider that there is an inherent contradiction in this objective. Could they not consider that developments of higher densities do not necessarily and contribute to an attractive, safe and accessible environment?</p> <p><b>4. Economy</b></p> <p>To facilitate and support a strong, diverse and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities.</p> <p>Again this is a very worthwhile objective which perhaps should be tempered with words such as ‘while respecting the local environment’</p> <p><b>5. Town Centres</b></p> <p>To enhance the vitality and viability of town, district and local centres in West Berkshire as places for shopping, leisure and community activities.</p> <p>Once again while supporting the objective we feel there ought to be some caveat(s) attached or would this objective allow some very unfriendly neighbour development?</p> <p><b>6. Culture</b></p> <p>Together with other partners, to develop and promote the cultural distinctiveness and heritage of the area to ensure it makes a positive contribution to the future wellbeing and sustainability of West Berkshire’s economy and communities. This is a laudable new objective but it is not clear what culture actually means in this context, and, as it is new, some examples of what it would mean in planning terms would be useful.</p> <p>It also seems that heritage is brought into this objective and not into other objectives but heritage also has its own objective. This does seem a trifle odd.</p> <p><b>7. Heritage</b></p> <p>To conserve and enhance the local distinctive character and identity of the built, historic and natural environment in West Berkshire's towns, villages and countryside.</p> <p>Further to the previous comment should Heritage now include non-physical elements as it is mentioned in the cultural objective?</p> <p><b>8. Green Infrastructure and Healthy Living</b></p>

Respondent	Response
	<p>To ensure that West Berkshire contains a strong network of multi-functional green infrastructure which provides benefits for health, the environment and enhances the overall quality of life of sustainable communities.</p> <p>This is a very laudable objective. However, none of the objectives cover the wider issues of biodiversity. There is mention of multi-functional green infrastructure giving benefits to the environment, but there are many other elements which go towards a much more complete package of biodiversity improvements. Indeed it might be that there should be a separate objective for improving biodiversity.</p> <p><b>9. Transport</b></p> <p>To make provision for transport networks that support sustainable growth in West Berkshire and to promote low emission transport choices.</p> <p>While supporting this objective should it not also be linked to other non-transport issues that reduce the need to make journeys? For instance the provision of high speed broadband and the provision of local employment and facilities that reduce the frequency and length of trips?</p> <p><b>10. Infrastructure</b></p> <p>To ensure that infrastructure needs (physical and social) arising from the growth in West Berkshire are provided to support and keep pace with development in accordance with the detail set out in the Infrastructure Delivery Plan. This objective is welcomed but, unfortunately, the existing Infrastructure Delivery Plan does not seem to have been delivered. If this is likely to be the case in the future, (for reasons outside WBC's control?), should other objectives or policies not be introduced which recognise this ever widening gap and approach the problem from a different angle?</p>
Burghfield Parish Council	Yes. You could emphasise an important point by inserting the words “energy efficiency and” after “including” at the beginning of line 2 under “3. Sustainability and Quality Development”.
Burghfield NDP Group	Yes. You could emphasise an important point by inserting the words “energy efficiency and” after “including” at the beginning of line 2 under “3. Sustainability and Quality Development”.
Historic England	Turning now to the Scoping Report, we welcome and support, in principle, Strategic Objective 7 for Heritage. However, we would prefer it to refer to the significance and special interest of heritage assets (what it is that makes them important).
Sport England	Yes
Savills (UK) Ltd for Thames Water	No objection
Environment Agency	We are pleased to see objectives for climate change, Green Infrastructure and Infrastructure in general.

Respondent	Response
	<p>As part of the 'Green Infrastructure and Healthy Living' objective the conservation and enhancement of watercourses and their riverbank habitats need to be included here as 'blue infrastructure.'</p> <p>As part of the 'Infrastructure' objective we would expect to see sewage treatment infrastructure covered with any impact on receiving watercourses from discharge from these sewage treatment works taken into consideration. We do not want to see any deterioration of the water quality in watercourses as a result of the proposed growth and the increase in flows to sewage treatment works.</p> <p>An additional objective should be about fluvial flood risk management. Another objective should be about pollution prevention and water quality including surface water and ground water quality protection.</p>
<b>General consultation bodies</b>	
Theatres Trust	<p>Yes - In particular we welcome the identification of 'Culture' as a strategic priority in line with both the current and draft revised versions of the NPPF. It must be ensured that the objective covers culture in a broad sense, relating not just to West Berkshire's cultural heritage which makes it distinct but also to the area's facilities which contribute to the cultural well-being of local people and attract people to the area such as theatres, cinemas and pubs.</p> <p>We also recommend that the scope of 'Town Centres' is amended to refer to cultural uses alongside "shopping, leisure and community activities" to better accord with definitions provided by the NPPF.</p>
Mid & West Berks Local Access Forum	Yes. We particularly endorse inclusion of objective 8 'Green Infrastructure & Healthy Living' as an objective but emphasize that the provision of off-road paths and public open space for informal air & exercise of the human population should be an important component.
British Horse Society	Yes but Objective 8 'Green Infrastructure and Healthy Living' must recognize the needs of equestrian activities and needs if the equestrian economy is to thrive in West Berks.
Reading Gospel Hall Trust	Yes
<b>Other stakeholders</b>	
Robert Wallace	<ol style="list-style-type: none"> <li>1. - NO - I doubt W Berks CC can do anything to affect Climate change</li> <li>2. Yes THE BIGGEST CHALLENGE we face</li> <li>3. Yes</li> <li>4. Not much you can do about it directly</li> </ol>

Respondent	Response
	5. Yes - a major challenge 6. Tough to do in a time of cuts 7. OK 8. OK 9. Another major problem 10 OK
Christopher Gent	We agree with the draft objectives
Neil Richardson	Housing – Assessed Need. The requirements of particular groups such as FTBs, older people and self – builders need to be taken into account.
David Lister	Yes
William Graham	Yes
<b>Landowners, site promoters and developers</b>	
Barton Willmore for Sulham Estate	<p>On behalf of our client, we consider that draft strategic objectives seem to form an appropriate basis for the foundation of the review to the Local Plan. In particular we consider that the following draft strategic objective is of great significance:</p> <p><i>“Together with other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographics and health profile of the District.”</i></p> <p>We support the delivery of housing to meet the housing needs across the District and consider that this should be achieved through the allocation of a range of sites with a preference for those in sustainable locations and well related to existing settlements. In addition to meeting the housing needs across the plan period, we also note the importance of the council maintaining an up to date Five Year Housing Land Supply. We suggest that the allocation of smaller to medium sites which are able to deliver in the short to medium term is instrumental in complimenting the larger allocations which will deliver later in the plan period and ensuring that there is a consistent delivery of needed homes. Our client’s site at Hall Place Farm is very well placed to serve this role and, on this basis should be considered for allocation.</p>
Barton Willmore for Graham Child	On behalf of our client, we consider that the draft strategic objectives appear to cover the most pertinent points that require consideration. In particular, we support the objective in relation to housing which states the following:

Respondent	Response
	<p><i>“Together with other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographics and health profile of the District.”</i></p> <p>We support the delivery of housing to meet the housing needs across the District and consider that this can be achieved through the allocation of a range of sites. With regard to meeting the assessed need to 2036, our client would highlight the need to also achieve the required 5 year housing land supply. In this regard our client would draw the Council’s attention to small/medium sized sites which have the ability to deliver housing in the short term and benefit the Council’s 5 year housing land supply. Our client would again highlight that their site at Pangbourne Hill is fits into this category and should be considered for allocation.</p>
Bewley Homes	<p>Engagement should not be limited to those authorities within the West Berkshire Housing Market Areas. Effective and on going joint working between strategic plan making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy.</p>
Boyer Planning for Spitfire Bespoke Homes	<p>Spitfire generally support strategic objective 2 (Housing) of the West Berkshire Local Plan Review to 2036 where it states that the Council will work with the other Berkshire authorities within the Western Berkshire Housing Market Area to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. Spitfire also support the objective to provide a mix of house sizes, types and tenures, through a variety of delivery methods.</p> <p>However, in relation to strategic objective 2, Spitfire make the following key points:</p> <p><b>i) The Local Plan Review has been substantially delayed &amp; the associated consequences for the Council’s housing land supply position</b></p> <p>The Council’s existing spatial strategy is set out in the 2012 Core Strategy. Policy CS 1 (Delivering New Homes and Retaining the Housing Stock) of this document states:</p> <p>‘An update of the Strategic Housing Market Assessment (SHMA) (so that it accords with the requirements of National Planning Policy Framework, paragraph 159) will be undertaken within <u>3 years of the adoption of the Core Strategy</u>. This will be carried out in co-operation with neighbouring authorities within the Housing Market Area. If the updated SHMA indicates that housing provision within the District needs to be greater than currently planned, a review of the scale of housing provision in the Core Strategy will be undertaken’ (<u>Our emphasis</u>).</p> <p>Despite the clear requirement for the Core Strategy housing requirement to be reviewed within 3 years of the plan’s adoption in 2012 and the publication of the Berkshire SHMA over two years ago, it is only now that the Council has</p>

Respondent	Response
	<p>progressed to the earliest possible consultation stage relating to a new Local Plan. This has resulted in underlying under-delivery against the defined subsequent objectively assessed housing need (OAHN). In addition, it has resulted in the Council becoming subject to a housing land supply shortfall, contrary to the requirements of NPPF paragraph 47. This housing land supply deficit was confirmed at the 2017 public inquiry relating to a proposal for up to 401 dwellings at Land adjacent to Hilltop, Oxford Road, Donnington, Newbury (PINS Ref. APP/W0340/W/16/3143214), where the Inspector stated:</p> <p><u>'On that basis, the main parties agree that a five-year supply of deliverable housing sites cannot be demonstrated. The relevant policies for the supply of housing therefore attract less weight and the National Planning Policy Framework (the Framework) paragraphs 49 and 14 are engaged<sup>18</sup>. The presumption in favour of sustainable development in paragraph 14 of the Framework is agreed to apply' (Our emphasis) (paragraph 19).</u></p> <p>It follows that the Council's continued delay in producing a new Local Plan has resulted in a 'planning by appeal' approach whereby sites not identified in a plan-led manner have come forward to fill unmet housing need shortfalls. Given the continued delay in reviewing the Local Plan and the associated consequences of this delay (i.e. a housing land supply deficit), it follows that this Local Plan Review must proceed at the earliest opportunity and allocate sites of varying scales and in a mix of geographic locations to ensure that necessary future needs are met and appropriate flexibility is built into the plan to provide the greatest possible opportunity to meet challenging housing requirements in the future.</p> <p><b>ii) A minimum housing requirement</b></p> <p>In March 2018, the Government published a draft NPPF for consultation incorporating policy proposals previously consulted on in the Housing White Paper and the 'Planning for the right homes in the right places' consultations.</p> <p>In launching the draft NPPF, the Prime Minister referred to the decades of housing under-delivery that have occurred and the social inequality issues resulting from the shortage of housing in the country:</p> <p>'The causes and manifestations vary from place to place but the impact is all too clear: in much of the country, housing is so unaffordable that millions of people who would reasonably expect to buy their own home are unable to do so. Others are struggling even to find somewhere to rent.</p> <p>...</p> <p>The root cause of the crisis is simple. For decades this country has failed to build enough of the right homes in the right places.</p> <p>So the shortage of housing in this country reinforces inequality. It prevents social mobility and stops people fulfilling their</p>

Respondent	Response
	<p>potential. It creates and exacerbates divisions between generations and between those who own property and those who do not'.</p> <p>In a supporting Ministerial Statement, the Secretary of State ('SoS') for Housing, Communities and Local Government (Sajid Javid) stated:</p> <p>'The Government has made it clear that we need to get our country building. At Budget 2017 we set out reforms to enable us to achieve 300,000 homes built each year by the middle of the next decade. The Housing White Paper, published in February last year, set out our plans'.</p> <p>Paragraph 36 of the draft NPPF goes onto state:</p> <p>'Strategic and local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:</p> <p>a) Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area's objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that <u>unmet need from neighbouring areas is accommodated where it is practical to do so</u> and is consistent with achieving sustainable development;' (<u>Our emphasis</u>)</p> <p>The housing requirement to be met across the District is to be clearly expressed as a minimum figure. It follows that the emerging plan offers the opportunity to generate significant flexibility within the developable land supply so to ensure housing needs are met over the plan period. It follows that the challenging emerging housing requirement must be expressed as an absolute minimum. We consider that the draft strategic objective relating to housing should reflect this. It follows that there is a need to insert substantial flexibility into the emerging plan in order to meet such challenging housing targets. Any failure to not allocate a level of growth substantially above this minimum figure would fail the positively prepared, effective and justified tests of soundness.</p> <p><b>iii) Meeting Unmet Needs from Adjoining Local Planning Authorities</b></p> <p>Alongside meeting its own OAHN, the District is also bound by the positive preparation test of soundness requiring the District to accommodate unmet need from neighbouring authorities where it is practical to do so. Policy H1 of the Pre-Submission Draft Reading Borough Local Plan issued for consultation in November 2017 stated:</p> <p>'Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036.</p>

Respondent	Response
	<p>The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period.'</p> <p>It follows that the West Berkshire Local Plan should make a contribution towards the unmet housing need of Reading Borough, given its close geographical relationship and the acknowledgement in Reading Borough's Local Plan that it's OAHN cannot be met inside its tight administrative boundary (paragraphs 4.4.3 and 4.4.4). This places a requirement upon the District to plan for a yet higher level of housing growth.</p>
Mark Carter for Mr R.L.A. Jones	<p>The Respondent welcomes the Strategic Objectives and particularly Objective 2 "Housing" to ensure that the need for housing is met up to 2036 and also that a mix of housing will be provided. However it should be explicitly stated that the need for new housing will be met through the identification and allocation of new housing sites (or sites to replace already allocated housing sites that have not come forward.</p>
Deloitte for Green Park Business Park	<p>The National Planning Policy Framework (2012) sets out a presumption in favour of sustainable development. It encourages the use of previously developed land promoting mixed use development in locations that are, or can be made sustainable.</p> <p>Policy CS 9 of the West Berkshire Core Strategy 2006-2026 (Core Strategy) directs major office development to West Berkshire's town and district centres and then sequentially edge and out of town locations, including Protected Employment Areas.</p> <p>The Core Strategy highlights that 14% of West Berkshire's population works in Reading and identifies opportunities to invest in transport services at Green Park by "improving sustainable transport links to Reading through joint working, particularly bus, cycle and pedestrian routes along the A4 corridor and the proposed new station". West Berkshire work with Reading Borough Council on joint transport activities "particularly related to the need to deliver sustainable transport solutions to reduce and manage the growth of congestion around the A4 and the M4 and surrounding transport corridors".</p> <p>The Scoping Report seeks to identify future levels of housing and employment land need as well as other land uses and infrastructure provision for West Berkshire, up to 2036. GPR welcomes the Local Plan Review, and its efforts to identify such strategic issues that need to be addressed by the Local Plan over the period up to 2036. It is important to ensure that there is an up to date evidence base for employment land by ensuring the Economic Market Area and Economic Development Needs Assessment remain relevant. Part of this approach is ensuring that any future Local Plan strategy for housing and employment is reflective of the needs of the area.</p> <p>Green Park provides an important employment and residential location for West Berkshire and Reading.</p> <p>GPR, therefore, supports the Draft Strategic Objectives set out in Appendix 1 of the Report, in particular No.2 Housing to</p>

Respondent	Response
	<p>ensure the assessed need for housing is met. It identifies a variety of delivery methods and there should be recognition in the drafting of the Plan and spatial strategy which underpins it, of the sustainable role of development of employment and residential uses at Green Park can provide. This is particularly in the context of the new railway station at Green Park and the choice of transport modes that will be available from 2019/2020.</p> <p>GPR is also supportive of Objective 4 'Economy', which seeks to facilitate and support a strong, diverse and sustainable economic base provision of employment land. The Objective looks to identify future employment land in order to provide for a range of local job opportunities. This will be integral to a thriving West Berkshire economy and the wider Thames Valley area, which is fast developing as a key business destination just outside of London.</p> <p>To assist West Berkshire with its review of future employment land, GPR request that the Council continues to recognise Green Park as a key employment area in the Local Plan Review. We ask for this to be done in tandem with the continued investment and enhancement of sustainable transport and highways infrastructure improvements. This is because the Park set to become an enhanced regional centre with the onset of the new railway station due to be delivered by March 2020, which will have an impact in strengthening its role as a key housing and employment hub. It is important that West Berkshire Council and Reading Borough Council aspirations are aligned to ensure that provision of infrastructure in the wider Reading area is considered as a whole.</p>
Fisher German for Mr Musgrave and Begley	<p>Largely agreed, but it is considered that the rural area should be supported further, by providing adequate housing which meets the needs of both the District's urban and rural communities over the lifetime of the plan.</p> <p>Suggested rewording:</p> <p><b>2. Housing</b></p> <p>Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District including urban and rural communities.</p>
Gladman Developments	<p>It is considered essential that the strategic objectives must represent an appropriate balance between the economic, social and environmental objectives of the planning system in order to shape a local plan that can promote a sustainable pattern of development. The objectives contained within Appendix 1 of the Scoping Report have the potential to achieve this goal and it will be important that any associated vision, strategy and policy wording fully supports the sustainable growth potential of the area over the plan period.</p>
Hallam Land Management	<p>We fully support the Strategic Objectives as set out in Appendix 1 and have no further comments</p>

Respondent	Response
Nexus Planning for Pangbourne Beaver Properties	<p>The draft strategic objectives at Appendix 1 cover a range of issues, but we note that the second of those deals with Housing and states that:</p> <p>“Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District”.</p> <p>This objective is supported.</p>
Nexus Planning for Croudace	<p>The draft strategic objectives at Appendix 1 cover a range of issues, but we note that the second of those deals with Housing and outlines that:</p> <p>“Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. To provide a mix of house sizes, types and tenures, through a variety of delivery methods and respond to the changing demographic and health profile of the District”.</p> <p>Croudace Homes has no objection to the Strategic Policies as set out.</p>
Pegasus Planning for Donnington New Homes	<p>Yes – these are all valuable objectives to work towards when reviewing the Plan. However, some of the Strategic Objectives are more valuable than others, and should be given greater weight. These are climate change (specifically flood mitigation in new development), housing, sustainable and quality development, and green infrastructure.</p>
Pegasus Planning Group for Donnington New Homes	<p>Yes – these are all valuable objectives to work towards when reviewing the Plan. However, some of the Strategic Objectives are more valuable than others, and should be given greater weight. These are housing, sustainable and quality development (specifically accessible homes for older people), culture (specifically tourism), green infrastructure and healthy living (specifically the provision of green infrastructure with new development), and infrastructure (specifically community uses).</p>
Pegasus Planning for Wasing Park Estate	<p>It would be useful for the strategic objectives to include reference to supporting economic growth in rural areas and encouraging diversification, where appropriate.</p> <p>It is considered that the strategic objectives should recognise the importance of sustainable economic development in the rural areas. The Draft Revised National Planning Policy Framework (NPPF) was published for consultation from 5th March until 10th May 2018. Paragraphs 84 and 85 of the Draft Revised NPPF make clear the importance of the rural economy. The West Berkshire Local Plan Review should therefore facilitate a prosperous rural economy, and particularly</p>

Respondent	Response
	<p>the aims and objectives of the Wasing Estate Plan, which is currently being produced by the Wasing Estate (see Question 8 below). Paragraph 84 requires planning policies and decisions to enable:</p> <p>“a) the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well designed new buildings;  b) the development and diversification of agricultural and other land-based rural businesses;  c) sustainable rural tourism and leisure developments which respect the character of the countryside; and  d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.”</p> <p>Paragraph 85 continues that; “Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development 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). The use of previously developed land and sites that are well-related to existing settlements should be encouraged where suitable opportunities exist.”</p> <p>Paragraph 85 suggests that local authorities should adopt an even more flexible approach when assessing the accessibility credentials of local commercial/business and community needs in rural areas. It accepts that sites for these uses may have to be found outside the existing settlements, in locations that are not well served by public transport.</p> <p>It is considered that the Local Plan Review Strategic Objectives includes specific reference to the rural economy, diversification and sustainability of the rural areas.</p>
Pro Vision for Rivar	<p>Generally, consideration should be given to restructuring the objectives to demonstrate that the three overarching objectives of the planning system (set out in the draft NPPF at Paragraphs 8 and 9) will be delivered, taking local circumstances into account. We would comment on each of the 10 draft objectives as follows:</p> <ul style="list-style-type: none"> <li>• Climate Change. The objective should not be to minimise the demand for energy (which implies restricting growth). It should be to move to a low carbon economy.</li> <li>• Housing. The objective should be to ensure that a sufficient number and range of homes is provided to meet the assessed local need. Unless a joint spatial strategy is prepared with the other LPA's within the broadly defined HMA (which we would not support), it is not appropriate to consider the housing needs of a wider area. Only if the assessed housing need of neighbouring authorities cannot be accommodated, should cross border strategic planning be considered.</li> <li>• Sustainable and Quality Development. Agreed.</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• Economy. The objective should be to foster sustainable economic growth, to include making provision of sufficient employment land to meet assessed needs.</li> <li>• Town Centres. The objective should recognise that Town Centres should be allowed to grow and change, and to include a diverse mix of uses (including housing, offices and live/work) that reinforces their individual sense of place.</li> <li>• Culture. Agreed.</li> <li>• Heritage. Agreed.</li> <li>• Green Infrastructure and Healthy Living. Agreed (although the definition of multi-functional greenspace needs to be reviewed - see below).</li> <li>• Transport. Agreed .</li> <li>• Infrastructure. Agreed.</li> </ul>
Pro Vision for Audley Group	<p>We observe that this objective should be more explicit about the various components of the objectively assessed housing need over the plan period, especially meeting the needs of a growing elderly population (and given that the council's latest SHMA specifically distinguishes this type of housing need from conventional housing – see response to Q7 below). It should more closely reflect the National Planning Policy Framework (NPPF), for example:</p> <p>Paragraph 7: one of the three strands of 'sustainable development' is the "social role", which includes "providing the supply of housing required to meet the needs of present and future generations". Implicit within this national objective, is planning for the needs of the ageing population.</p> <p>Paragraph 17: The "Core planning principles" include "Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth".</p> <p>Paragraph 50: "Deliver a wide choice of high quality homes" including planning for "the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes".</p> <p>Paragraph 159: "Local planning authorities should have a clear understanding of housing needs in their area" and should "address the need for all types of housing, including affordable housing and the needs for different groups in the community", which includes "older people".</p> <p>The importance of planning to meet the objectively assessed needs of specific groups is reflected in the proposed changes to the NPPF published earlier this month, for example, paragraph 62:</p> <p><i>"Within this context, policies should identify the size, type and tenure of homes required for different groups in the community (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers<sup>21</sup>, people who rent their homes and people wishing to commission or build their own homes)".</i></p> <p>This National Policy reflects the urgent and growing need for more specialist accommodation for older people. National Planning Practice Guidance refers to:</p>

Respondent	Response
	<p><i>“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013)(NPPG Paragraph: 021 Reference ID: 2a-021-20160401). This ‘critical need’ is highlighted in the West Berkshire Sustainability Report, also published for consultation. This states that</i></p> <p><i>“Future demographics indicate that the population of the area as a whole is projected to rise to over 166,000 by 2036. Significantly, the population of over 65s is forecast to grow by over 59% in the period 2016-2036 and the over 85s by 148% over the same period. This is above the national average and will call for a much increased demand for suitable housing, health care services and facilities for the elderly. The increased prevalence of those with long term illnesses and disability (closely linked to an ageing population) living longer along with a desire for independence, will have the similar effect. Equally, the need to take more personal control of health and wellbeing, including obesity, should increase demand for green infrastructure and health facilities. A key challenge has been identified to explore any link between the District Health profiles and air quality” (SA Scoping Report Table 2; page 17).</i></p> <p>Paragraph 65 of the Draft Revised NPPF should also be noted. This addresses the relationship between the provision of affordable housing in major developments and the provision of “specialist accommodation” such as “purpose-built accommodation for the elderly”.</p> <p>In the above context it is proper that the revised Local Plan should make explicit provision for increasing the supply of specialist accommodation for older people. A recent Committee Report publication by HCLG – ‘Housing for Older people’ - makes some important recommendations in relation to the preparation of Local Plans (<i>Housing for Older People</i>, Second Report of Session 2017-19; Communities and Local Government Committee (5 Feb 2018)). Paragraph 122 states:</p> <p><i>“We believe that older people should be able to choose from a wide choice of housing which can accommodate their needs and preferences. This will include, across the social and private sectors, smaller, or better designed, general needs housing, accessible housing, specialist housing, including retirement homes and extra care housing, and cohousing. To enable them to make this choice, and move to a home which better suits their needs, the guidance required under the Neighbourhood Planning Act 2017 should recommend that:</i></p> <p><i>Local authorities produce and publish a strategy explaining how they intend to meet the housing needs of older people in their area, including the scale and mix of housing and the tenures needed, and setting out the evidence relating to current housing need.</i></p> <p><i>Local Plans should, based on an assessment of local need, identify a target proportion of new housing to be developed for older people and identify suitable well-connected sites, close to local amenities. They should identify a range of different types of housing, including accessible homes, extra care housing and smaller mainstream homes to be built. The number of homes developed against this target should be published each year.</i></p>

Respondent	Response
	<p><i>There should be greater collaboration within local authorities between planning, social care, health and housing teams, particularly on the production of Local Plans. Local authority planning, health and social care teams should work together to assess the savings to health and social care budgets which may arise from additional specialist housing in their area and consider this in the context of negotiations over planning charges.</i></p> <p><i>Local authorities should be more receptive to private developers who wish to build housing for older people in their area, and appreciate the potential health and wellbeing benefits leading to reduced need to health and social care services to be gained”.</i></p> <p>It is important that the revised Local Plan positively plans for delivering an appropriate range of specialist accommodation to offer genuine options for independent living, for example with specific site allocations for C2 use rather than housing sites which may be capable of accommodating C2 use (which could otherwise be priced out by conventional C3 market housing values) and does not burden schemes with obligations including affordable housing.</p> <p>It is now widely recognised that traditional nursing homes provide only a limited answer to the challenge of an ageing population and Local Plans need to be more positive in supporting the full range of modern specialist care options. (Please also note our comments under Question 7 regarding National Planning Policy Guidance and the definition of specialist elderly accommodation).</p> <p>Secondly, we observe that the draft objectives do not explicitly cover the rural areas of the district. It would be appropriate to include an objective to sustain rural communities i.e. support development that contributes to the social, economic, and environmental interests of the rural communities, recognising the positive and valuable contribution that can be made to that objective by the elderly population as part of socially cohesive and inclusive communities.</p> <p>Development needs and opportunities in the countryside are often very different to the urban areas, but the draft objectives do not make any such distinction. The appropriate spatial strategy is to continue to direct growth towards the existing hierarchy of settlements, but the plan should also explicitly support and manage sustainable development in the rural areas, recognising as in the case of Audley (and other providers) that older persons accommodation and care villages already exist in these locations. These institutions can and do make a significant contribution to the prosperity of the rural economy, both through the staff they employ from the local area and the local supply chain businesses, and the residents and their visitors who make use of local services and facilities. This economic and social activity should not be underestimated, and is in line with the requirements of national policy, which includes a need to:</p> <p><i>“support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.”</i></p>

Respondent	Response
	<p>And</p> <p><i>“promote the retention and development of local services and community facilities in villages, such as shops, meeting places, sports venues, cultural buildings, public houses and places of worship”. NPPF para 28</i></p> <p>This theme is carried forward and expanded in the Revised Draft NPPF. Draft paragraph 85 states:</p> <p><i>“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development 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). The use of previously developed land and sites that are well-related to existing settlements should be encouraged where suitable opportunities exist.</i></p>
Pro Vision for Greenham Trust	<p>The Trust wishes to make the following observations about the draft objectives to ensure that the Revised Local Plan is based on a strong foundation for promoting sustainable development.</p> <p>Draft Objective 3 – Sustainable and Quality Development is currently drafted as</p> <p><i>“To ensure provision of sustainable developments of high quality design, construction, and efficiency (including land use) which contribute to an attractive, safe and accessible environment for all”.</i></p> <p>To ensure that this is consistent with national policy, it would be appropriate for this definition to be expanded to clarify that good design is also about ensuring that developments function well (i.e. are fit for purpose), are affordable i.e. not overburdened with design requirements, and deliverable, and can be readily adapted to meet changing needs in the future (NPPF paragraph 58 and repeated at paragraph 126 of the Draft Revised NPPF published in March 2018).</p> <p>Objective 4 – Economy is drafted as</p> <p><i>“To facilitate and support a strong, diverse, and sustainable economic base across the District, including the provision of employment land which provides for a range of local job opportunities”.</i></p> <p>The Trust generally supports this objective. As well as supporting the provision of employment land, It would, however, be appropriate to expand this definition to include explicit support for making effective use of the District’s existing employment areas (of which Greenham Business Park is one of the most significant areas). This would be consistent with Objective 7 of the Sustainability Appraisal Scoping Report:</p> <p><i>“To promote and improve the efficient of land use” and national policy (NPPF 17 [eighth bullet] and paragraph 111, and Chapter 11 of the Draft Revised NPPF).</i></p>

Respondent	Response
Pro Vision for Rootes Trustees	<p>Generally, consideration should be given to restructuring the objectives to demonstrate that the three overarching objectives of the planning system (set out in the draft NPPF at Paragraphs 8 and 9) will be delivered, taking local circumstances into account. We would comment on each of the 10 draft objectives as follows:</p> <ul style="list-style-type: none"> <li>• Climate Change. The objective should not be to minimise the demand for energy (which implies restricting growth). It should be to move to a low carbon economy.</li> <li>• Housing. The objective should be to ensure that a sufficient number and range of homes is provided to meet the assessed local need. Unless a joint spatial strategy is prepared with the other LPA's within the broadly defined HMA (which we would not support), it is not appropriate to consider the housing needs of a wider area. Only if the assessed housing need of neighbouring authorities cannot be accommodated, should cross border strategic planning be considered.</li> <li>• Sustainable and Quality Development. Agreed.</li> <li>• Economy. The objective should be to foster sustainable economic growth, to include making provision of sufficient employment land to meet assessed needs.</li> <li>• Town Centres. The objective should recognise that Town Centres should be allowed to grow and change, and to include a diverse mix of uses (including housing, offices and live/work) that reinforces their individual sense of place.</li> <li>• Culture. Agreed.</li> <li>• Heritage. Agreed.</li> <li>• Green Infrastructure and Healthy Living. Agreed (although the definition of multi-functional greenspace needs to be reviewed - see below).</li> <li>• Transport. Agreed.</li> <li>• Infrastructure. Agreed.</li> </ul>
Pro Vision for Cala Group and Wates Developments	<p>Generally, consideration should be given to restructuring the objectives to demonstrate that the three overarching objectives of the planning system (set out in the draft NPPF at Paragraphs 8 and 9) will be delivered, taking local circumstances into account. We would comment on each of the 10 draft objectives as follows:</p> <ul style="list-style-type: none"> <li>• Climate Change. The objective should not be to minimise the demand for energy (which implies restricting growth). It should be to move to a low carbon economy.</li> <li>• Housing. The objective should be to ensure that a sufficient number and range of homes is provided to meet the assessed local need. Unless a joint spatial strategy is prepared with the other LPA's within the broadly defined HMA (which we would not support), it is not appropriate to consider the housing needs of a wider area. Only if the assessed housing need of neighbouring authorities cannot be accommodated, should cross border strategic planning be considered.</li> <li>• Sustainable and Quality Development. Agreed.</li> <li>• Economy. The objective should be to foster sustainable economic growth, to include making provision of sufficient employment land to meet assessed needs.</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• Town Centres. The objective should recognise that Town Centres should be allowed to grow and change, and to include a diverse mix of uses (including housing, offices and live/work) that reinforces their individual sense of place.</li> <li>• Culture. Agreed.</li> <li>• Heritage. Agreed.</li> <li>• Green Infrastructure and Healthy Living. Agreed (although the definition of multi-functional greenspace needs to be reviewed - see below).</li> <li>• Transport. Agreed.</li> <li>• Infrastructure. Agreed.</li> </ul>
Savills for Englefield Estate	<p>The draft strategic objectives need to recognise the rural nature of the majority of the District, and therefore the need to support an economically, socially and environmentally strong countryside. A strategic objective should be added thus:</p> <p>“Countryside. To promote and support the vitality of the countryside within the District as a place to live and work”</p>
Joy Schlaudraff	<p>Yes, but not all together. There should be more strategic objectives, to identify, and develop wherever possible, small sites up to 50 houses, which are falling through the gap in semi-rural sites, or rural sites, which have become semi-rural, but have not been officially identified as such. There are numerous opportunities to develop suitable sites, and this would help solve the housing crisis. The problem is there is no specific guidance on this in planning policy, only that which says why development can't be built, and not on why it can. This has a prejudicial effect.</p> <p>All land which can be developed, should be developed to its maximum potential and sensitively according to character and appearance. This is common sense</p>
Turleys for Commercial Estates Group	<p>We consider that the draft strategy objectives are broadly correct, with the exception of Objective 2 'Housing'. As we explain in detail in relation to the following question, we do not consider that it is appropriate for the Council to preclude the possibility of having to address unmet housing needs from outside of the identified West of Berkshire HMA.</p>
Turleys for Berfeld	<p>We comment as follows on the draft strategic objectives:</p> <ol style="list-style-type: none"> <li>1. Climate change: the existing strategic objective 1 in the Core Strategy states: “To exceed national targets for carbon dioxide emissions reduction and deliver the District’s growth in a way that helps to adapt to and mitigate the impacts of climate change.” In our view, this strategic objective should be similarly focussed on growth, as that is where opportunities to address climate change effects will be available; and to remind the residents of West Berkshire that this Local Plan is principal document for managing and delivering growth up to 2036.</li> <li>2. Housing: the existing strategic objectives 2 and 3 of the Core Strategy deal with Housing Growth and Housing Needs respectively. Not only does this imply recognition of the need to achieve growth, but also uses more positive language to</li> </ol>

Respondent	Response
	<p>achieve this objective. The absence of growth is noted and regrettable and should be included. Similarly, the previous objective to promote sustainable communities is also absent and creates a less positive tone for this very important objective. We consider that the Council should revisit this objective to include growth and ensure that positive language is included that reflects the opportunity that growth can deliver. The first bullet point under paragraph 157 of the NPPF states that Local Plans should “plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework”.</p> <p>The language of the NPPF in relation to meeting housing need is also more wide-ranging and specific than that used by the Council. Paragraph 159 includes the requirement to “address the need for all types of housing”, which the Council should incorporate in its objective.</p> <p>8. Green Infrastructure and Healthy Living: We support this objective and the implicit recognition that green infrastructure can contribute to healthy lifestyles and a better quality of life. It should not, however, be limited to “sustainable communities”, but to all existing and future residents of West Berkshire, whether they are deemed to meet the current definition of sustainability or not.</p> <p>10. Infrastructure: infrastructure needs are not limited to physical and social categories, there is also a need for environmental infrastructure to enhance the environment. This could include flood relief works that provide environmental benefits. Infrastructure needs are also not exclusively linked to growth. We recognise that growth does mean additional infrastructure investment and provision, but there are also existing communities that would benefit from infrastructure delivery, possibly linked to growth.</p> <p>Paragraph 156 of the NPPF sets out the strategic priorities for plan making, and includes references to infrastructure at bullet point 3 and 4, as follows:</p> <ul style="list-style-type: none"> <li>• “the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);</li> <li>• the provision of health, security, community and cultural infrastructure and other local facilities”</li> </ul>
Turleys for North East Thatcham Consortium	<p>The Consortium generally agrees with the Council’s proposed scope of the Local Plan Review for the following reasons and subject to the following comments.</p> <p>Draft strategic objective 2 relates to housing. The objective states <i>“Together with the other Berkshire authorities within the Western Berkshire Housing Market Area, to ensure that the assessed need for market and affordable housing will be met across the District.”</i> Whilst the Consortium generally supports that approach, it should be amended in order to ensure that the “full” objectively assessed needs of the area are met. This ensures consistency with the wording in paragraph 47 of the Framework (2012).</p>

Respondent	Response
	<p>The objective also seeks: <i>“To provide a mix of house sizes, types and tenures”</i>. The Consortium agrees that along with the overall number of homes to be provided it is of equal importance that the range of homes to be provided recognises and responds to the needs of present and future generations. This must recognise the needs arising within West Berkshire but in addition to ensuring that effective cooperation results in the delivery of the <i>numerical</i> housing requirements of the Western Berkshire Housing Market Area, the Consortium is also mindful that the cooperation should extend to the type of housing.</p> <p>The Berkshire SHMA concludes that with regards to market housing across the West Berkshire HMA 62% of housing needed will require more than 3 bedrooms<sup>4</sup>. Across all housing tenures (including affordable) the SHMA suggests that in the order of 55% housing will need to be of this size in the HMA and that the mix identified should be used to inform strategic Local Authority District-wide policies and inform the ‘portfolio’ of sites which are considered through its local plan process.</p> <p>In preparing its new Local Plan, Reading Borough Council has already acknowledged (in the Pre- Submission Local Plan of November 2017) that housing delivery, particularly on sites in the centre of the Borough, will largely be made up of smaller dwellings. Reading Borough Council has identified that this will need to be considered in the wider housing market area and their Pre-Submission Local Plan (November 2017) states that:</p> <p><i>“Reading is likely to provide a significantly greater proportion of smaller dwellings than its neighbours in the Western Berkshire HMA. This may mean that some rebalancing across the HMA is appropriate, with other authorities potentially providing a greater proportion of larger family accommodation.”</i> (paragraph 4.4.12)</p> <p>The objective should recognise the important role that West Berkshire has in meeting the needs of households not accommodated in Reading, or other parts of the HMA in this regard. This should specifically acknowledge an objective to meet the needs of family households whose needs are not being met in other parts of the HMA.</p> <p>Strong support is provided to the facilitation and support of a strong, diverse and sustainable economic base in the District as prescribed through draft strategic objective 4. The Consortium considers that the Council should acknowledge the inherent link between the delivery of new housing and the maintenance of a <i>“strong, diverse and sustainable economic base across the District, including the provision of employment land which provides a range of local job opportunities.”</i> The provision of new housing provides the opportunity to retain and attract new residents of working age who are able to contribute towards supporting the maintenance and growth of the economy and it is therefore critical that policies on both key aspects in the draft Local Plan Review are fully integrated.</p>

Respondent	Response
	<p>This will also have an important spatial dimension. The Consortium comments that attempts to focus new housing development around significant employment generating locations, such as the Colthrop Industrial Estate, provide the opportunity to support sustainable transport patterns and allow increased opportunities for residents to live close to their place of work. In addition this will protect and enhance the attractiveness of the area to employers by ensuring that their workforce requirements can be met.</p> <p>The Consortium also strongly supports the need to enhance the vitality and viability of centres in West Berkshire under draft strategic objective 5. It is readily apparent that this remains an important consideration with the Consortium noting that the regeneration of Thatcham town centre was identified as an ‘opportunity’ in the Core Strategy 2012 with that aspiration embedded within Area Delivery Plan Policy 3. Whilst the need for regeneration was clearly established in the Core Strategy in 2012 there has not been any significant progress in achieving the aspiration and regeneration of Thatcham town centre. It should therefore remain a priority for investment and regeneration.</p> <p>The vitality and viability of individual centres is fundamentally linked to their changing population and the quality of their infrastructure. This in turn is influenced by the support given to a centre’s capacity to grow in terms of its housing stock as well as its employment base. The Core Strategy directed a low level of development to Thatcham, in both proportionate (8.6% of needs) and absolute terms (900 homes or 45 homes per annum). The Consortium considers that the Local Plan Review provides an opportunity to realise and support a number of long held aspirations through the adoption of a more pro-active approach to enabling Thatcham’s future growth and regeneration.</p> <p>Directing an increased level of new housing to Thatcham would increase the resident population of the town; support a more mixed and inclusive community and therefore create opportunities to increase and capture local expenditure. In turn this will provide increased impetus for investment in Thatcham and the realisation of the town centre’s regeneration.</p> <p>The Consortium notes that draft strategic objective 10 is framed in a way which requires infrastructure needs arising from growth in West Berkshire to support and keep pace with development. The Consortium agrees with the principle of this objective but strongly suggests that the Council establishes a positive and proactive means of ensuring that this infrastructure can be provided to ensure the effectiveness of the Local Plan Review. The Consortium considers that this approach is fundamental to the achievement of sustainable development. The Consortium considers that the matter of infrastructure delivery is particularly pertinent to Thatcham where housing requirements have been constrained in recent years due to the existing education capacity at the town.</p> <p>As part of the Examination in to the Housing Site Allocations DPD, the Council produced a note titled ‘Overview of Thatcham infrastructure constraints’ which stated:</p>

Respondent	Response
	<p><i>“Thatcham has accommodated high rates of growth in recent times which has led to a substantial increase in the dwelling stock of the town in a short space of time placing high demand on infrastructure, services and facilities. <u>To address this development pressure and to address concerns raised through the consultations on both the Core Strategy and the Thatcham Vision, the focus through the Core Strategy was on regeneration to ensure that the infrastructure, services and facilities of Thatcham improve and it becomes a more self-contained market town.</u> This need was expressed very strongly in all of the consultation exercises completed during the Thatcham Vision project. The Thatcham Vision formed part of the evidence base for the Core Strategy.”</i></p> <p><i>“The Core Strategy Inspector set out in para 64 of the Inspector’s Report (CD/01/16) that ....”Whilst Thatcham is an urban area closely related to Newbury, it is reasonable for the Council to consider that it is not part of the sub-regional hub. The Council also took into account the fact that Thatcham had seen considerable housing growth in recent years. It wants the focus to be on regeneration and renewal of facilities rather than further growth. These reasons resulted in the rejection of Thatcham as a location for a strategic site and provision for only a modest proportion of the growth apportioned to all urban areas.”</i></p> <p><i>“He then went on to say in paragraph 65 that “.....the approach in the Plan is a justified local choice made by the Council.”</i></p> <p><i>“In the context of paragraphs 64 and 65, the Inspector’s comments in paragraph 67 that “In any overall review to accommodate more housing, Thatcham would be a location to be considered again.....” The Council does not disagree with this comment but without a holistic approach to planning and delivering improvements to the infrastructure, further housing development would be premature and exacerbate pressure on services and facilities.”</i></p> <p>The Consortium notes that whilst the Core Strategy restricted housing delivery at Thatcham as this would “<i>be premature and exacerbate pressure on services and facilities</i>” and put the focus on “<i>regeneration to ensure that the infrastructure, services and facilities of Thatcham improve</i>”, the Core Strategy did not set out a clear mechanism as to how those improvements would be achieved. In short, the Council identified education capacity at Thatcham as a critical issue, but the level of development planned at the town through the Core Strategy would have been unable to significantly increase capacity.</p> <p>The Local Plan Review must take a sufficiently positive view as to how infrastructure provision and the accommodation of needs can be realised in parallel. In Thatcham for example where the provision of new housing will be a pre-requisite of supporting the regeneration of the town, a strategic view must be taken of the full infrastructure needs associated with growth to ensure that they can be addressed and delivered.</p>

Respondent	Response
	<p><i>The directing of additional development towards Thatcham would enable the provision of a range of infrastructure which would serving the needs of the development, also provide opportunities for the delivery of strategic new educational facilities to address current infrastructure deficiencies and serve the existing and future community.</i></p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>No. There is a significant omission in the strategic objectives in that the one relating to housing provision (Objective 2) makes no reference to rural communities. The adopted Core Strategy has a Strategic Objective relating to this matter which states that,</p> <p><i>'To secure provision of affordable and market housing to meet local needs in both urban <b>and rural areas</b> of the District. To provide homes in a way that <b>promotes sustainable communities</b>, providing a mix of house sizes, types and tenures to meet identified needs, and respond to the changing demographic profile of the District.'</i></p> <p>Some elements of this wording are included in draft strategic objective 2, but the reference to both 'urban and rural areas of the district' and promoting 'sustainable communities' are omitted. This needs to be added in as enabling rural communities to grow and thrive should be a key objective to reflect the policy advice contained in both the current NPPF and the proposed revisions to it as set out in the response to question 1.</p>
Woolf Bond Planning for Donnington New Homes	<p>We refer to draft strategic objective no. 2 (Housing) and make the following key points:</p> <p><u>Need for Housing in West Berkshire</u> The existing Core Strategy housing requirement provides for a lower housing requirement when compared to the objectively assessed housing need figure identified in the 2016 Berkshire SHMA. We therefore suggest that it is important that this <b>Local Plan Review allocates sites of varying scales and in a mix of geographic locations</b> to enable necessary future needs to be met and in turn secure appropriate flexibility to be built into the plan to provide the greatest possible opportunity to meet challenging housing requirements in the future.</p> <p><u>A minimum housing requirement</u> In March 2018, the Government published a draft revised NPPF for consultation incorporating policy proposals previously consulted on in the Housing White Paper and the 'Planning for the right homes in the right places' consultations.</p> <p>In launching the draft revised NPPF on the 5th March 2018, the Prime Minister referred to the decades of housing under delivery that have occurred and the social inequality issues resulting from the shortage of housing in the country:</p> <p>'The causes and manifestations vary from place to place but the impact is all too clear: in much of the country, housing is so unaffordable that millions of people who would reasonably expect to buy their own home are unable to do so. Others are struggling even to find somewhere to rent.</p> <p>...</p>

Respondent	Response
	<p><b>The root cause of the crisis is simple. For decades this country has failed to build enough of the right homes in the right places. So the shortage of housing in this country reinforces inequality. It prevents social mobility and stops people fulfilling their potential. It creates and exacerbates divisions between generations and between those who own property and those who do not’.</b></p> <p>In a supporting ministerial statement, the Secretary of State (‘SoS’) for Housing, Communities and Local Government (Sajid Javid) stated: ‘The Government has made it clear that we need to get our country building. At Budget 2017 we set out reforms to enable us to achieve 300,000 homes built each year by the middle of the next decade. The Housing White Paper, published in February last year, set out our plans’. Paragraph 36 of the draft NPPF goes onto state:</p> <p>‘Strategic and local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:</p> <ol style="list-style-type: none"> <li><b>1. Positively prepared – provides a strategy which will, as a <u>minimum</u>, meet as much as possible of the area’s objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that <u>unmet need from neighbouring areas is accommodated where it is practical to do so</u> and is consistent with achieving sustainable development;’ (Our emphasis)</b></li> </ol> <p>We recommend that the housing requirement to be met across the District is to expressed as a minimum figure. It follows that the emerging plan offers the opportunity to generate significant flexibility within the developable land supply so to ensure housing needs are met over the plan period. It follows that the challenging emerging housing requirement should be expressed as a minimum. We consider that the draft strategic objective relating to housing should reflect this. It follows that there is a need to insert substantial flexibility into the emerging plan in order to meet challenging housing targets.</p> <p><u>Meeting Unmet Needs from Adjoining Local Planning Authorities</u></p> <p>Alongside meeting its own objectively assessed housing need, the District is also bound by the positive preparation test of soundness requiring the District to accommodate unmet need from neighbouring authorities where it is practical to do so. Paragraph 4.45 of the draft Reading Borough Local Plan issued for consultation in May 2017 stated: ‘Delivering the level of housing set out in policy H1 will mean that there is a shortfall of 943 dwellings when considered against Reading’s need. This will need to be accommodated elsewhere within the Western Berkshire Housing Market</p>

Respondent	Response
	<p>Area. The other three authorities within the HMA recognise that there will be issues with Reading's ability to accommodate its need within its own boundaries, and this issue is set out within the West of Berkshire Spatial Planning Framework to which the four authorities have signed up<sup>62</sup>. There will be continuing dialogue on this matter between the affected authorities which will inform the Pre-Submission Draft of the Local Plan. Where agreement is reached, it will be for individual authorities' Local Plans to specify where development will be located' (paragraph 4.4.5).</p> <p>It follows that the West Berkshire Local Plan may need to make a contribution towards the unmet housing need of Reading Borough, given its close geographical relationship and the acknowledgement in Reading Borough's Local Plan that its objectively assessed housing need cannot be met inside its tight administrative boundary. We also note that due to Reading Borough's tightly constrained urban nature the majority of new residential stock being permitted is for apartment led schemes. This has resulted in an imbalance in dwelling mix terms, especially when one considers that 60% of Reading's need for market housing is for 3 and 4 bedroom properties in the market sector (see Table 107 of the 2016 Berkshire SHMA)</p> <p>The above considerations place a requirement upon the District to potentially plan for a level of housing growth above West Berkshire's own need and a greater proportion of family sized residential dwellings.</p>
Woolf Bond Planning for Donnington New Homes	<p>We refer to draft strategic objective no. 2 (Housing) and make the following key points: Need for Housing in West Berkshire</p> <p>The existing Core Strategy housing requirement provides for a lower housing requirement when compared to the objectively assessed housing need figure identified in the 2016 Berkshire SHMA. We therefore suggest that it is important that this Local Plan Review allocates sites of varying scales and in a mix of geographic locations to enable necessary future needs to be met and in turn secure appropriate flexibility to be built into the plan to provide the greatest possible opportunity to meet challenging housing requirements in the future. A minimum housing requirement</p> <p>In March 2018, the Government published a draft revised NPPF for consultation incorporating policy proposals previously consulted on in the Housing White Paper and the 'Planning for the right homes in the right places' consultations.</p> <p>In launching the draft revised NPPF on the 5th March 2018, the Prime Minister referred to the decades of housing under delivery that have occurred and the social inequality issues resulting from the shortage of housing in the country:</p> <p>'The causes and manifestations vary from place to place but the impact is all too clear: in much of the country, housing is so unaffordable that millions of people who would reasonably expect to buy their own home are unable to do so. Others are struggling even to find somewhere to rent.</p>

Respondent	Response
	<p>The root cause of the crisis is simple. For decades this country has failed to build enough of the right homes in the right places.</p> <p>So the shortage of housing in this country reinforces inequality. It prevents social mobility and stops people fulfilling their potential. It creates and exacerbates divisions between generations and between those who own property and those who do not'.</p> <p>In a supporting ministerial statement, the Secretary of State ('SoS') for Housing, Communities and Local Government (Sajid Javid) stated:</p> <p>'The Government has made it clear that we need to get our country building. At Budget 2017 we set out reforms to enable us to achieve 300,000 homes built each year by the middle of the next decade. The Housing White Paper, published in February last year, set out our plans'.</p> <p>Paragraph 36 of the draft NPPF goes onto state:</p> <p>'Strategic and local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:</p> <ol style="list-style-type: none"> <li>1. a) Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area's objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;' (Our emphasis)</li> </ol> <p>We recommend that the housing requirement to be met across the District is to expressed as a minimum figure. It follows that the emerging plan offers the opportunity to generate significant flexibility within the developable land supply so to ensure housing needs are met over the plan period. It follows that the challenging emerging housing requirement should be expressed as a minimum. We consider that the draft strategic objective relating to housing should reflect this. It follows that there is a need to insert substantial flexibility into the emerging plan in order to meet challenging housing targets.</p> <p>Meeting Unmet Needs from Adjoining Local Planning Authorities</p> <p>Alongside meeting its own objectively assessed housing need, the District is also bound by the positive preparation test of soundness requiring the District to accommodate unmet need from neighbouring authorities where it is practical to do so. Paragraph 4.45 of the draft Reading Borough Local Plan issued for consultation in May 2017 stated:</p> <p>'Delivering the level of housing set out in policy H1 will mean that there is a shortfall of 943 dwellings when considered against Reading's need. This will need to be accommodated elsewhere within the Western Berkshire Housing Market Area. The other three authorities within the HMA recognise that there will be issues with Reading's ability to</p>

Respondent	Response
	<p>accommodate its need within its own boundaries, and this issue is set out within the West of Berkshire Spatial Planning Framework to which the four authorities have signed up. There will be continuing dialogue on this matter between the affected authorities which will inform the Pre-Submission Draft of the Local Plan. Where agreement is reached, it will be for individual authorities' Local Plans to specify where development will be located' (paragraph 4.4.5).</p> <p>It follows that the West Berkshire Local Plan may need to make a contribution towards the unmet housing need of Reading Borough, given its close geographical relationship and the acknowledgement in Reading Borough's Local Plan that its objectively assessed housing need cannot be met inside its tight administrative boundary. We also note that due to Reading Borough's tightly constrained urban nature the majority of new residential stock being permitted is for apartment led schemes. This has resulted in an imbalance in dwelling mix terms, especially when one considers that 60% of Reading's need for market housing is for 3 and 4 bedroom properties in the market sector (see Table 107 of the 2016 Berkshire SHMA)</p> <p>The above considerations place a requirement upon the District to potentially plan for a level of housing growth above West Berkshire's own need and a greater proportion of family sized residential dwellings.</p>
Woolf Bond Planning for JJP Land	<p>We refer to draft strategic objective no. 2 (Housing) and make the following key points:</p> <p>The Local Plan Review has been substantially delayed &amp; the associated consequences for the Council's housing land supply position</p> <p>The Council's existing spatial strategy is set out in the 2012 Core Strategy. Policy CS 1 (Delivering New Homes and Retaining the Housing Stock) of this document states:</p> <p>'An update of the Strategic Housing Market Assessment (SHMA) (so that it accords with the requirements of National Planning Policy Framework, paragraph 159) will be undertaken within 3 years of the adoption of the Core Strategy. This will be carried out in co-operation with neighbouring authorities within the Housing Market Area. If the updated SHMA indicates that housing provision within the District needs to be greater than currently planned, a review of the scale of housing provision in the Core Strategy will be undertaken' (Our emphasis).</p> <p>Despite the clear requirement for the Core Strategy housing requirement to be reviewed within 3 years of the plan's adoption in 2012 and the publication of the Berkshire Strategic Housing Market Assessment over two years ago, it is only now that the Council has progressed to the earliest possible consultation stage relating to a new Local Plan. These facts have resulted in underlying under delivery against defined subsequent objectively assessed needs for housing. In addition, it has resulted in the Council becoming subject to a housing land supply shortfall, contrary to the requirements of NPPF paragraph 47. This housing land supply deficit was confirmed at the 2017 public inquiry relating to a proposal for</p>

Respondent	Response
	<p>up to 401 no. dwellings at Land adjacent to Hilltop, Oxford Road, Donnington, Newbury (PINS Ref. APP/W0340/W/16/3143214), where the Inspector stated:</p> <p>'On that basis, the main parties agree that a five-year supply of deliverable housing sites cannot be demonstrated. The relevant policies for the supply of housing therefore attract less weight and the National Planning Policy Framework (the Framework) paragraphs 49 and 14 are engaged<sup>18</sup>. The presumption in favour of sustainable development in paragraph 14 of the Framework is agreed to apply' (Our emphasis) (paragraph 19).</p> <p>It follows that the Council's continued delay in producing a new Local Plan has resulted in a 'planning by appeal' approach whereby sites not identified in a plan led manner have come forward to fill unmet housing need shortfalls. Given the continued delay in reviewing the Local Plan and the associated consequences of this delay (i.e. a housing land supply deficit), it follows that this Local Plan Review must proceed at the promptest possible rate and allocate sites of varying scales and in a mix of geographic locations to ensure that necessary future needs are met and appropriate flexibility is built into the plan to provide the greatest possible opportunity to meet challenging housing requirements in the future.</p> <p>A minimum housing requirement</p> <p>In March 2018, the Government published a draft revised NPPF for consultation incorporating policy proposals previously consulted on in the Housing White Paper and the 'Planning for the right homes in the right places' consultations.</p> <p>In launching the draft revised NPPF on the 5th March 2018, the Prime Minister referred to the decades of housing under delivery that have occurred and the social inequality issues resulting from the shortage of housing in the country:</p> <p>'The causes and manifestations vary from place to place but the impact is all too clear: in much of the country, housing is so unaffordable that millions of people who would reasonably expect to buy their own home are unable to do so. Others are struggling even to find somewhere to rent.</p> <p>...</p> <p>The root cause of the crisis is simple. For decades this country has failed to build enough of the right homes in the right places. So the shortage of housing in this country reinforces inequality. It prevents social mobility and stops people fulfilling their potential. It creates and exacerbates divisions between generations and between those who own property and those who do not'.</p> <p>In a supporting ministerial statement, the Secretary of State ('SoS') for Housing, Communities and Local Government (Sajid Javid) stated:</p>

Respondent	Response
	<p>'The Government has made it clear that we need to get our country building. At Budget 2017 we set out reforms to enable us to achieve 300,000 homes built each year by the middle of the next decade. The Housing White Paper, published in February last year, set out our plans'. Paragraph 36 of the draft NPPF goes onto state:</p> <p>'Strategic and local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound' if they are:</p> <p>a) Positively prepared – provides a strategy which will, as a minimum, meet as much as possible of the area's objectively assessed needs (particularly for housing, using a clear and justified method to identify needs); and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;' (Our emphasis)</p> <p>The housing requirement to be met across the District is to be clearly expressed as a minimum figure. It follows that the emerging plan offers the opportunity to generate significant flexibility within the developable land supply so to ensure housing needs are met over the plan period. It follows that the challenging emerging housing requirement must be expressed as an absolute minimum. We consider that the draft strategic objective relating to housing should reflect this. It follows that there is a need to insert substantial flexibility into the emerging plan in order to meet such challenging housing targets. Any failure to not allocate a level of growth substantially above this minimum figure would fail the positively prepared, effective and justified tests of soundness.</p> <p>Meeting Unmet Needs from Adjoining Local Planning Authorities Alongside meeting its own objectively assessed housing need, the District is also bound by the positive preparation test of soundness requiring the District to accommodate unmet need from neighbouring authorities where it is practical to do so. Policy H1 of the Pre-Submission Draft Reading Borough Local Plan issued for consultation in November 2017 stated:</p> <p>'Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period.'</p> <p>It follows that the West Berkshire Local Plan should make a contribution towards the unmet housing need of Reading Borough, given its close geographical relationship and the acknowledgement in Reading Borough's Local Plan that its objectively assessed housing need cannot be met inside its tight administrative boundary (paragraphs 4.4.3 and 4.4.4). This places a requirement upon the District to plan for a yet higher level of housing growth.</p>
WYG for Donnington New Homes	Donnington New Homes support the proposed Draft Strategic Objectives as set out at Appendix 1. We particularly welcome objective 2, which seeks to ensure that the assessed need for market and affordable housing up to 2036 will be met across the District. Objectives 8 (GI and Healthy Living), 9 (Transport) and 10 (Infrastructure) are also welcome. The

Respondent	Response
	proposals for Sandleford Park South, as described in greater detail at Appendix A and below, will help deliver these objectives through the delivery of up to 500 homes, associated infrastructure and open space.

## Summary of responses

Overall there was general agreement with the revised strategic objectives. As part of that support though there were a number of requests for the clarification of certain definitions and also suggestions for revised wording and the inclusion of specific issues. The importance of ensuring the objectives are consistent with those contained in other Council plans and strategies was stressed.

The inclusion of a vision for the Review was thought to be a useful as it would help set the objectives in context.

Several responses expressed concern that the objectives did not distinguish between urban and rural areas. It was felt that specific mention of rural communities would be helpful and would encourage the provision of housing and support economic growth in rural areas.

The need for the objectives to be written in order to deliver and manage growth over the plan period was highlighted, whether that be moving towards a low carbon economy, fostering economic growth, or the encouragement of leisure activities.

There was some discussion, particularly from the development industry about ranking of the objectives. Two developers felt that there should be a ranking of what they felt were the most valuable objectives (ie. housing, climate change and sustainable and quality development), whilst a third felt there should be ranking that is reflective of the overarching objectives of the planning system.

Finally, there was also some overlap with issues considered in more detail under other questions such as:

- the need for an appropriate evidence base particularly for economy and green infrastructure;
- the need to meet the objectively assessed need over the Western Berkshire Housing Market Area;
- the need for the allocation of development sites of varying sizes;
- the need to meet the housing needs of key workers and other particular groups;
- to consider development needs and the provision of infrastructure in parallel. There was a feeling that the pressure on existing infrastructure was being overlooked and that infrastructure identified in the Infrastructure Delivery Plan has not delivered.

The key points raised on the individual objectives can be summarised as follows:

### *Objective 1: Climate Change (7 responses)*

- The Council cannot influence climate change.

- Concerns about the deliverability of the Objective – suggested ways of overcoming this include providing more context to demonstrate how combatting climate change can be achieved (eg. combine with Objective 3).
- The Objective should seek to move to a low carbon economy rather than minimise the demand for energy which implies restricting growth.
- The Objective should be focused on growth as this is where opportunities to address climate change will be available. Reference should be made to the Local Plan being the principle document for managing and delivering growth up to 2036.
- Narrow interpretation of climate change in Appendix 2 – policies listed under Objective 3 such as CS15 will also help to mitigate against the effects of climate change.

*Objective 2: Housing (21 responses)*

- Support for the allocation of various site promoted in the call for sites held last year.
- Sites of varying scales should be allocated. Larger allocations likely to deliver towards the end of the plan period.
- Recognition required of particular groups and the different types of accommodation needed, eg. self-builders, older persons.
- Council cannot demonstrate a five year supply of housing due to delays in the review of the Local Plan.
- The housing requirement should be expressed as a minimum.
- Unmet needs of neighbouring authorities should be accommodated.
- Cross border strategic planning should only be considered if the assessed needs of neighbouring authorities cannot be met.
- Objective makes no reference to rural communities or promoting sustainable communities
- Explicitly state that that the need for new housing will be met through the allocation of new housing sites.
- The economy drives the property market.
- Clarification required on the meaning of ‘responding to the changing demographic and health profile of the district’.
- Objective should include recognition of need to achieve growth and to promote sustainable communities
- Council should acknowledge link between the delivery of new housing and the maintenance of a strong, diverse and sustainable economic base.

*Objective 3: Sustainable and Quality Development (8 responses)*

- For reasons of clarity the objective should be re-phrased to refer to ‘...while using land efficiently with higher density housing’.
- Inclusion of reference to energy efficiency.
- High density developments do not contribute to attractive, safe and accessible environments.
- Expand objective to clarify that good design is also about developments functioning well, are affordable (not overburdened by design constraints), deliverable, and can be readily be adapted to meet changing needs.

*Objective 4: Economy (4 responses)*

- The Council cannot influence this objective.
- Include references to the designation of land in accessible locations, the need to respect the local environment, and the diversification and sustainability of the rural economy.

- The reference to the provision of employment land should be expanded to include support for the effective use of the District's existing employment areas.
- The Objective should seek to foster economic growth and ensure that there is the provision of sufficient employment land to meet assessed needs.
- Greater focus required on business development so to enable the growth of existing business, new business. The Objective should therefore be re-named 'Business Development'.
- The Local Plan strategy for employment must reflect the needs of the area.
- Green Park should be recognised as a key employment area.
- Consider the use of Article 4 Directions to restrict the loss of offices to residential under permitted development.
- Consider draft policy 8 of the Minerals and Waste Preferred Options which seeks to safeguard potential, planned, and existing minerals associated infrastructure.

Objective 5: Town Centres (4 responses)

- The strength of the local economy is the main influence on the success of high street businesses.
- Include references to accessibility and cultural uses.
- Re-word the objective to ensure that unfriendly neighbouring development does not take place.
- The Objective should recognise that town centres should be allowed to grow, change, and include a diverse mix of uses (that include housing, offices, live/work units) that reinforces their individual sense of place.

Objective 6: Culture (4 responses)

- Objective difficult to achieve in a time of cuts.
- Objective should also cover facilities that contribute to cultural well-being, eg. theatres, cinemas, and pubs.
- Definition of culture required.
- Questioned why heritage referenced when it has its own Objective (7).
- Consideration of the provision of hubs for major cultural, leisure and sporting events.

Objective 7: Heritage (4 responses)

- Definition of heritage required.
- Questioned whether non-physical elements should also be included.
- Inclusion of reference to the significance and special interest of heritage assets.
- Consider clarifying linkages with those in the Minerals and Waste Local Plan. Both plans should be consistent in their approach to policy issues for the application of policy in decision making.

Objective 8: Green Infrastructure and Healthy Living (10 responses)

- Objective needs strengthening by ensuring the environment is protected and the AONB enhanced.
- Biodiversity not covered.

- Inclusion of reference to blue infrastructure.
- Recognise the needs of the equestrian industry in order to enable the equestrian economy to thrive.
- The objective should not be limited to 'sustainable communities', and should instead cover all existing and future residents regardless of whether they meet the definition of sustainability or not.
- The definition of multi-functional green space needs reviewing.
- Policy framework for supporting open spaces unclear.

#### Objective 9: Transport (4 responses)

- The Objective should be linked to other non-transport journeys that reduce the need to travel, high speed broadband and provision of local employment.
- Consider clarifying linkages with those in the Minerals and Waste Local Plan. Both plans should be consistent in their approach to policy issues for the application of policy in decision making.

#### Objective 10: Infrastructure (4 responses)

- Existing infrastructure overlooked – capacity concerns, some communities would benefit from infrastructure linked to growth, infrastructure identified in the Infrastructure Delivery Plan has not delivered.
- The Local Plan Review must consider accommodation needs and the provision of infrastructure in parallel.
- Current policy is too focused on housing and not infrastructure.

### **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR).

The Council agrees that the inclusion of an overarching Vision would be particularly helpful and assist in setting the Strategic Objectives in context.

The general agreement amongst respondents with the draft Strategic Objectives is welcomed. It is acknowledged that they are broad and wide ranging and that is some overlap between them. In this context some definitions, such as culture and heritage, are also used in their broadest sense. The Objectives apply across the whole of the District, in both urban and rural areas. Although some respondents proposed a ranking of the Objectives the Council does not consider, in the interests of sustainable development, that would be appropriate.

Minor clarifications will be made to individual Objectives in response to some of the detailed comments made.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q3: Do you think our existing spatial strategy (as set out in the Core Strategy) is the most appropriate for development to 2036? If not please tell us why and give reasons for your answer.**

Number of responses received: 47

Respondent	Response
<b>Internal</b>	
Public Transport Team, West Berkshire Council	<p>The existing Spatial Strategy represents a good basis for development. It is important that the opportunity of reducing out-commuting and the need to travel - through the provision, development and retention of local employment opportunities in sites that are accessible by public transport, cycling and walking, and through enabling and encouraging home-working – remains at the forefront in determining proposals for development.</p> <p>It is equally important that any extensions to or infill development within, established urban areas, rural service centres and service villages (as identified in the District Settlement Hierarchy and reflected in Area Delivery Plan Policy 1) are appropriately and sensitively integrated into those established settlements, and specifically including the construction, extension or adaptation as appropriate of sustainable transport links so as to provide logical through routes connecting the development areas without requiring substantial deviation.</p>
<b>Statutory consultees</b>	
Stratfield Mortimer Parish Council	<p>The spatial strategy seems to be just a roll forward of the existing strategy. It seems apparent, from the volume of objections to the current manifestation of the strategy, that it does not accord with the wishes of the public even if it does provide the requisite amount of development. We suggest that a different approach should at least be given serious consideration. In particular a lot of the opposition to new development seems to arise from the lack of infrastructure, of many types, that is provided. Could this not be overcome, at least in part, by the greater promotion of Garden Villages? It is our understanding that such developments are only allowed where infrastructure is part of the package.</p> <p>This also picks up on the aspects of our serious concern for the lack of an objective related to communities. There is a danger that, by simply adding development to existing communities, you alter the very nature of that community. Clearly this is most obvious when development is added to small communities. But at what stage does a rural service centre morph into a small town because of more and more development and what effect does that have on its sense of</p>

Respondent	Response
	<p>community? A well-designed Garden Village, on the other hand, could be encouraged to develop its own community ethos as it is developed.</p> <p>In essence we are suggesting a strategy which does not just take what exists at present and adds bits and pieces. Rather it takes a more holistic approach to the whole District and examines the best way forward that will meet the aspiration of current residents, while at the same time meeting the legitimate demand for new development.</p>
Aldermaston Parish Council	<p>Aldermaston Parish Council asks that you review the status of Aldermaston Village as we believe recent changes may make it unable to meet the criteria of a service village.</p> <p>These changes include reduction of the bus service and closure of the post office.</p>
Thatcham Town Council	Yes
Streatley Parish Council	<p>Streatley Parish Council believes that the existing spatial strategy set out in the current Core Strategy is still the most appropriate. It was completed after extensive research and consultations, plus inspector hearings in 2008-2012 and nothing much has changed to warrant any further extensive (and expensive) review.</p> <p>The current settlement hierarchy in particular is still very appropriate. The distinction between urban, rural service centres, service villages and other villages is clear, well understood and accepted. The Parish Council strongly believes that the current status of Streatley as a village should be maintained. Nothing has changed since the previous evaluation and consultation except perhaps that its status has further worsened by the elimination of the Thames Travel public bus service. Streatley still has no shops, no Post Office, no bank, no medical surgery and no public transport (other than volunteer transport). Most residents are obliged to travel by car for these services to neighbouring larger settlements such as Goring, Woodcote, Pangbourne or Wallingford.</p> <p>Although Goring is relatively close, it is still not possible for many residents (particularly the old and young) to walk there, and it is in a different County and Local District with different priorities and policies, and a very different historical and development background.</p> <p>Furthermore, Streatley remains a very environmentally sensitive small village within the beautiful Goring Gap area. It is within the North Downs AONB and borders another AONB. It has extensive National Trust lands which overlook the village as well as an area of Special Scientific Interest, again overlooking the village. It also has an historic and now rare village layout with green animal grazing fields bordering the High Street in the middle of the village.</p>
Holybrook Parish Council	<p>Holybrook agree that the existing spatial strategy and dividing the District into different geographical areas are the most appropriate ways to deliver the spatial strategy. However, Holybrook, alongside Tilehurst and Purley, is considered to be urban. Therefore, much of the proposed development will be concentrated in these areas.</p>
Pangbourne Parish Council	<p>The spatial strategy is sound and fit for purpose. The relatively recent development of a collaborative approach by the four West of Berkshire authorities – WBC, Reading, Wokingham and Bracknell Forest – should result in an agreed optimum locational plan for future housing and infrastructure (Spatial Planning Framework). I particularly support the following vision statement (p.2):</p>

Respondent	Response
	<p>“It is intended to develop a collaborative model for the successful delivery of high quality new and expanded communities with appropriate infrastructure rich provision that is of benefit to the existing and new residents of the area. New and expanded communities will be in locations which are less disruptive to the amenities and interests of our existing residents. They will provide a high standard of amenity and development which will give high priority to the natural environment. New transport infrastructure will be integrated and involve high levels of investment in modern public transport systems. The collaborative approach will also seek to attract ongoing funding from developers and match funding and investment from government agencies to enable the timely delivery of both development and the associated infrastructure.”</p>
Burghfield Parish Council	Yes. It worked well in relation to the current Local Plan and I see no reason to change it.
Burghfield NDP Steering Group	Yes. It worked well in relation to the current Local Plan and we see no reason to change it.
Environment Agency	<p>We are pleased to see that the existing spatial strategy in the Core Strategy document covers Green Infrastructure, biodiversity and wildlife corridors. However you will need to consider the avoidance of fluvial flood risk when considering the location of development and settlements in your spatial strategy in order to be compliant with national planning policy. Paragraph 101 of the National Planning Policy Framework (NPPF) says:</p> <p>“The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding.”</p> <p>This needs to be applied to your spatial strategy when considering the location of all new development. This includes housing, transport links, retail, hospitals, schools, offices and land safeguarded for future development.</p>
Savills for Thames Water	We have no objection to the existing special strategy.
<b>General consultation bodies</b>	
British Horse Society	It seems appropriate from an equestrian point of view.
Theatres Trust	Yes
<b>Other stakeholders</b>	
Robert Wallace	No - it's out of date - people live and travel widely across and beyond the County boundaries - the division into "Urban" and "rural" communities has all but disappeared and will be long gone by 2026
David Lister	The Spatial Strategy makes no reference to extra land for education needs. The Kennet secondary school in Thatcham is already over-subscribed and unable to serve West Thatcham. The spatial strategy must at least address the capacity needs on schools and determine whether further land is required for their extension or replacement.

Respondent	Response
William Graham	Yes
Christopher Gent	We believe that the spatial strategy is appropriate
<b>Landowners, site promoters and developers</b>	
Barton Willmore for Graham Child	<p>Our client considers that the Core Strategy Policy ADPP1 was prepared at a time when the spatial portrait of the District may have looked different, prior to subsequent development that has taken place. Whilst the spatial strategy is therefore not disagreed with in principle, our client would highlight the need to identify the role and function of each settlement, to ensure the appropriateness of the spatial strategy. We note that the need for this information is discussed at paragraph 5.4 of the scoping report. We do not consider that sufficient evidence has been gathered to assess the baseline situation, in accordance with the Sustainability Appraisal, in order to answer this question comprehensively at the current time. In addition, we consider that the spatial strategy should also be informed by a review of the boundaries of each settlement, in order to facilitate sustainable development and ensure that the growth of Urban Areas, Rural Service Centres and Service Village is not unduly restricted during the plan period. Imperatively, as the adopted West Berkshire Core Strategy (2006-2026) notes at paragraph 4.38 <i>“The North Wessex Downs AONB covers 74% of West Berkshire...”</i>. Moreover in relation to Pangbourne the Core Strategy notes at paragraph 4.41 that:</p> <p><i>“Small scale extensions in keeping with the existing character and pattern of the development and in line with Pangbourne’s role as a rural service centre will help address issues of local housing need and provide opportunities for local people to buy a home in the village.”</i></p> <p>It is therefore clear that given the area it occupies, the AONB should be appropriately reviewed, particularly at settlement edges, to ensure that sustainable sites that do not have a detrimental impact on the wider setting of the AONB can come forward. It is further clear that the strategy has previously considered small scale extensions at Pangbourne a suitable strategy in this regard. The Council should note that this strategy was employed to deliver the Core Strategy housing requirement only, and it should therefore now be re-visited again in light of the new and increased housing need within West Berkshire. In this regard our client would highlight that their land at Pangbourne Hill straddles the development boundary of Pangbourne (Rural Service Centre) and should be considered as a suitable allocation, to contribute to the District’s housing need.</p> <p>We note that the North Wessex Downs AONB washes over Pangbourne. Consequently, we have had due regard to the test associated with paragraph 116 of the NPPF 2012. Referring to designated areas, which include Areas of Outstanding Natural Beauty, paragraph 116 states:</p> <p><b><i>“Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</i></b></p> <ul style="list-style-type: none"> <li data-bbox="667 1286 1973 1345">• <b><i>The need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;</i></b></li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• <b><i>The cost of, and scope for developing elsewhere outside the designated area, or meeting the need for it in some other way; and</i></b></li> <li>• <b><i>Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be ”</i></b></li> </ul> <p>The definition of ‘major’ developments, for the purpose of paragraph 116, is not clearly defined, however in any event we submit that our client’s site would not be considered ‘major’ development for this test. Notwithstanding this, we have considered the associated bullet points and consider that:</p> <ol style="list-style-type: none"> <li>1. there is/will be a need for development within the District and more specifically a need for housing within Pangbourne as one of the areas for development focus;</li> <li>2. as Pangbourne is washed over by the AONB, there is no opportunity to develop in this location without developing within the designated area; and as we have demonstrated via the submitted Landscape Appraisal and associated Opportunities and Constraints Plan the development of the site will not result in any detrimental effect on the environment or landscape.</li> </ol> <p>In addition, and for clarity, we note the draft NPPF (March 2018) replicates the above wording at paragraph 170.</p>
Barton Willmore for Sulham Estate	<p>Whilst we do not disagree with the spatial strategy in principle, this should be viewed in the context of when the strategy was originally prepared and the subsequent development which has taken place that may have changed the spatial context of the District. It should also be viewed in the context of National Policy which has changed since the spatial strategy was adopted and includes the need to boost significantly the supply of housing (NPPF, Paragraph 47). The spatial strategy identifies Newbury, Thatcham and the Eastern Urban Area which includes Tilehurst, Calcot &amp; Purley on Thames as ‘Urban Areas’ which offer a wide range of services. On behalf of our client, we consider that given the sustainable nature of the existing Urban Areas, opportunities should be explored for development on sites which adjoin settlement boundaries. This should include sites which are currently within the AONB.</p> <p>With this in mind, our client’s site, Land at Hall Place Farm Tilehurst, provides the opportunity to accommodate in the region of 80 new homes within a sustainable location adjoining the Eastern Urban Area. The site has low landscape sensitivity as its landscape character is heavily influenced by its urban fringe location and the surrounding ancient woodland to the north and west which shields views of the site from the wider AONB. As such, subject to a sensitive and high-quality design and an appropriate landscaping strategy, the site presents an important opportunity to deliver sustainable development.</p> <p>We note that paragraph 115 of the NPPF attaches great weight to conserving landscape and scenic beauty in Areas of Outstanding Natural Beauty and our client is fully supportive of this position. Nevertheless, due to the overall low character sensitivity of the site, we do not consider that the delivery of this development would compromise the conservation of the landscape and scenic beauty of the wider AONB. As such, we do not consider that the allocation of this site for residential development would conflict with national policy.</p> <p>Further to Paragraph 115 of the NPPF, in relation to development within Areas of Outstanding Natural Beauty, paragraph 116 of the NPPF states the following:</p>

Respondent	Response
	<p><b>“Planning permission should be refused for major developments in designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest. Consideration of such applications should include an assessment of:</b></p> <ul style="list-style-type: none"> <li>• <b>The need for the development, including in terms of any national considerations, and the impact of permitting it or refusing it, upon the local economy</b></li> <li>• <b>The cost of, and scope for, developing elsewhere outside the designated area, or meeting the need for it in some other way</b></li> <li>• <b>Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be ”</b></li> </ul> <p>It is important to note that we do not consider the proposed delivery of up to 80 dwellings in this location to constitute major development in the context paragraph 116 of the NPPF. This is due to the site adjoining the Reading Urban Area conurbation.</p> <p>Nevertheless, should the view be taken that the proposal would constitute a major application in the context of paragraph 116 of the NPPF, we consider that the site can meet the assessment set out in the bullet points above. Firstly, in relation to need, there is a recognition at National Policy level of the need to deliver more housing, particularly in the south east and particularly in sustainable locations. As such, there is a clear need for this development to come forward.</p> <p>Secondly, in relation to delivering elsewhere outside of the designated area, we note that the Council’s existing spatial strategy directs development towards the Eastern Urban Area. It is noted that there are increasingly limited opportunities to deliver within the Eastern Urban Area due to previous development and existing allocations. It is also noted that 74% of the borough is covered by the AONB. As such, in informing their emerging spatial strategy, the Council need to look at the opportunity to deliver housing development in sustainable locations which directly adjoin the settlement and are well related to existing infrastructure and services.</p> <p>Thirdly, in relation to a detrimental effect on the landscape, as set out within the Landscape Capacity Assessment which accompanies these representations, overall the site has low landscape sensitivity and the potential to accommodate residential development due to urbanising features including the settlement edge and existing built form within the site.</p>
Bewley Homes	<p>We do not agree that the Spatial Strategy should be based on the four spatial areas. It applies generalisations to areas without considering the role and function of individual settlements and their ability to accommodate growth.</p> <p>In the current Local Plan the East Kennet Valley area was allocated relatively low growth to reflect the more limited services and poorer transport links. In the example of Woolhampton which falls within this area, it is considered that an assessment of its characteristics and services would demonstrate that it is a location that could accommodate growth.</p> <p>Further consideration should be given to the individual character, facilities and transport connectivity of settlements and their ability to deliver more growth. This is explained in more detail in Question 4.</p>
Boyer Planning for Spitfire Bespoke Homes	<p>The Council’s current spatial strategy (to 2026) as set out in the Core Strategy Policy ADPP1 provides a settlement hierarchy for West Berkshire, having regard to the role and function of the settlement. As a small village, Beenham is not included in the current settlement hierarchy.</p>

Respondent	Response
	<p>Spitfire are concerned that it is the Council's intention to continue to adopt this approach to 2036 by building on the existing settlement pattern and use of a hierarchy of settlements as the focus for development.</p> <p>Spitfire support the Council's intention to re-examine the current role and function of each of the individual settlements, although a review of Beenham, which offers limited services, is unlikely to be ranked in the revised settlement hierarchy. Spitfire consider that it is essential that the future sustainability of each settlement is considered as part of the settlement hierarchy review. For smaller settlements, like Beenham, which have limited facilities, without some housing growth to support improved and new social and community infrastructure, the smaller villages will continue to suffer and any remaining community infrastructure (like Beenham Primary School) will be at risk of closure.</p> <p>As such, it is essential that West Berkshire plan for housing growth in smaller villages like Beenham to improve the sustainability of the village for the future.</p> <p>Allowing further growth in smaller villages like Beenham is consistent with paragraph 80 of the draft NPPF which highlights the importance of plans needing to identify opportunities for villages to grow:</p> <p>'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'.</p> <p>For the above reasons, Spitfire suggest that a sustainable residential extension of Beenham, including 3.19ha of land to the south of Back Lane should be identified in the emerging Local Plan. The site could be delivered inside a 5 year period and therefore soon after the adoption of the plan.</p>
Mark Carter for Mr R.L.A. Jones	<p>The Respondent considers that the existing spatial strategy is the most appropriate for the District.</p> <p>In particular re affirmation that Lambourn is a "rural service centre" that can accommodate further (housing) development including the Respondent's site previously identified as LAM007 "land between Folly Road, Rockfel Road and Stork House Drive, Lambourn".</p> <p>Lambourn still has a range of services and reasonable public transport provision which also serve the requirements of surrounding communities and these should be reinforced.</p> <p>Although there is much discussion about the role of surrounding Districts in meeting housing need these Districts are already heavily constrained and are unlikely to contribute. West Berkshire should be looking to meet its own (housing) needs within its boundaries.</p>
Carter Jonas for Hermitage Farms	<p>The NPPF sets out a presumption in favour of sustainable development. Whilst it is accepted that the larger settlements and growth areas such as Newbury will receive the majority of the forecasted growth, the Local Plan Review should seek to allow more housing and employment opportunities on the edge of smaller settlements in West Berkshire, on a proportionate basis, to promote the rural economy and to ensure the local services and facilities are maintained and to improve levels of affordability in rural areas.</p> <p>There are sustainable settlements located in West Berkshire which are not constrained by planning restrictions such as Green Belt and environmental constraints such as areas prone to flooding. Furthermore, smaller sustainable settlements</p>

Respondent	Response
	<p>such as Hermitage contain local facilities. To support these existing services and facilities and to improve the availability of affordable housing provision of new homes is needed in smaller settlements.</p> <p>Hermitage is considered to be a highly sustainable location for new residential and employment development. It would be able to connect into existing infrastructure and would make a significant contribution to the viability and vitality of Hermitage.</p> <p>The sites are either immediately adjacent to or in close proximity to Hermitage. Hermitage benefits from a range of services including a primary school, two public houses, general store and post office, garden centre and a number of light industrial units. The village has a good vehicle access to the M4 motorway and the A34 and there is a regular bus services into Newbury. Appropriate design and landscaping would ensure that development is physically and visually well contained and does not adversely affect the character and appearance of the AONB. There are no known constraints which would impact on the availability, suitability or achievability of development of the sites.</p> <p>Hermitage Farms would encourage amendments to the current spatial strategy to allow for more flexibility in delivering new homes and employment sites in some of the more sustainable villages which have a wide range of local shops, services and community facilities, which are not constrained by environmental or landscape designations and where deliverable sites exist adjacent to the village, such as at Hermitage.</p> <p>This strategy would make a significant contribution to housing and employment needs within West Berkshire. New housing development would ensure that sites are allocated which can contribute to the five year housing land supply. Hermitage Farms note that a significant proportion of the planned housing will be delivered on strategic sites. Large strategic sites and new settlements (such as the one being promoted at Grazeley) will require significant infrastructure provision before any homes can be built. This strategy should be balanced with a strategy which allocates smaller sites adjacent to villages. Sites such as those identified within Appendix 1 &amp; 2 require much less investment in infrastructure and can be bought forward quickly and easily, contributing to and sustaining the Councils five year housing land supply.</p>
The Chilton Estate	<p><u>Rural Service Centres and Villages</u></p> <p>The policies of the Plan should reflect the need to keep these settlements alive and thriving by encouraging small scale development in villages and larger ones of up to 100 dwellings in Rural Service Centres where people wish to live and where young people are being priced out of the market.</p>
Fisher German LLP for Mr Musgrave and Begley	<p>The existing spatial strategy is not considered to be the most appropriate strategy.</p> <p>Agree to a certain extent, that most development will be within or adjacent to the settlements included in the settlement hierarchy, and related to the transport accessibility of the settlements, their level of services and the availability of suitable sites for development.</p> <p>However, whilst it is laudable to aim for the majority of development to take place on previously developed land it is inevitable that green field land will be required to meet the increasing housing needs. As such it is considered that the statement should be omitted given it is unlikely to be met.</p>

Respondent	Response
	<p>The Strategy focusses most development to the urban areas. Clearly some of the most suitable locations for development will be in accessible locations in and around the urban area, however development, particularly affordable housing, the provision of jobs, social and community facilities is required to help sustain, enhance and make both the area's towns and villages more self-supporting places to live and work.</p> <p>The Council should recognise that some villages have experienced the loss of vital services such as shops and pubs in recent years and that changing the current strategy of relative restraint in the rural area could increase the population and change the age profile of rural villages.</p> <p>It should also be acknowledged that an increase in activity and spending power would support existing vulnerable village services and facilities, possibly leading to new provision. In addition, a range of development sizes in the rural villages would be likely to bring with them a range of types and sizes of housing, which would provide more choice for existing residents wanting to stay within a village but down-size.</p> <p>As such rural service centres and service villages have a role to play in accommodating growth which can play a role in enhancing or maintaining the vitality of villages.</p> <p>The above is even more important to consider when the OAN for West Berkshire has been increased from 525 dpa to 665 dpa, an increase of 140dpa. The rural areas have capacity in a number of the settlements to accommodate these increases.</p> <p>In addition, it is clear that the neighbouring authority of Reading Borough Council is unable to meet its own housing need. The West of Berkshire Spatial Planning Framework, states that: <b><i>"This will help meet needs across the Western Berkshire HMA, helping to deliver housing for areas which can't meet all of their needs within their own boundaries. In particular it is already clear that Reading with its tight urban boundaries will find it difficult to accommodate its Objectively Assessed Need (OAN) for housing identified in the SHMAA."</i></b></p> <p>At this stage it is understood that West Berkshire, Wokingham and Bracknell Forest Council's will need to accommodate approximately 1,000 homes of Reading's unmet needs. The initial response from West Berkshire however has been dismissive of this stating it is too early in the Plan making process itself to understand if it can accommodate this unmet need, however a Memorandum of Understanding signed by the four Western Berkshire HMA authorities that Reading's unmet need will be accommodated in the HMA. The breakdown of where this should be met within the HMA is not identified, but it is anticipated that West Berkshire, as the much larger of the authorities, will need to accommodate much of this.</p> <p>It is therefore even more imperative that the new spatial strategy considers the suitability of each of the settlements in the District for growth, including the rural areas, as these are areas that are able to proportionately grow and enhance their services and facilities without adversely impacting on them.</p>
Gladman Developments	<p>A range of spatial strategy options will need to be tested as part of the preparation of the new Local Plan for West Berkshire. The existing Core Strategy advocates an approach that seeks to direct development based on the existing settlement pattern, focussing growth in areas depending on their role and function within the settlement hierarchy. Gladman are of the view that development should continue to be directed in accordance with a settlement hierarchy,</p>

Respondent	Response
	<p>ensuring that meaningful levels of growth are planned to enable and support the sustainability of a wide range of communities and settlements. The Council's evidence base will need to carefully consider the needs of settlements and communities across the District in setting a strategy that supports the current and future needs of communities whilst fully realising the areas sustainable economic growth potential. Gladman therefore welcome the Council's intention to reexamine the current role and function of all individual settlements across the District as part of the process of reviewing the Local Plan.</p>
Hallam Land Management	<p>Whilst the current settlement hierarchy continues to be relevant, there is no flexibility in the current strategy for development opportunities beyond urban extensions and infill. The inflexibility of this approach is neither justified or practical if the Council is genuinely committed to delivering the most sustainable pattern of growth within the District and it is imperative therefore that the strategy also accommodates the opportunity to consider the potential for a new settlement proposal and specifically the new community proposals south of Reading.</p>
Nexus Planning for Pangbourne Beaver Properties Ltd	<p>The Scoping Report notes that Core Strategy Policy ADPP1 sets out the current spatial strategy for delivery of growth within West Berkshire, seeking to strike a balance between:  “protection of the District’s environmental assets and improving the quality of life for all, ensuring that necessary change and development is sustainable in the interests of future generations”.</p> <p>That strategy adopts a hierarchy of settlements that states:  “Most development will be within or adjacent to the settlements included in the settlement hierarchy set out below, and related to the transport accessibility of the settlements (especially by public transport, cycling and walking) their level of services and the availability of suitable sites for development. The majority of development will take place on previously developed land.”</p> <p>The Council suggests in the Scoping Report that the emerging Local Plan would continue to build on the existing settlement pattern, using the hierarchy of settlements as the focus for development. PBP Ltd broadly support this approach.</p> <p>It goes on to suggest that the current role and function of all individual settlements would be re- examined to ensure the settlements identified in each category remain the most appropriate.</p> <p>The policy designates Pangbourne as a Rural Service Centre, along with Burghfield Common, Hungerford, Lambourn, Mortimer, and Theale. Of these six villages only four (Hungerford, Pangbourne, Mortimer and Theale) benefit from a railway station. Given the increasing importance of the railway system and proximity to railway stations for future sustainable transport it is considered that the status of these four settlements that have a railway station should be elevated by designating them as <u>Principle Rural Service Centres</u>. This designation should then facilitate policies that would allow for appropriate amounts of housing to be directed to these villages.</p>
Nexus Planning for Croudace Homes	<p>The Scoping Report notes that Core Strategy Policy ADPP1 sets out the current spatial strategy for delivery of growth within West Berkshire, seeking to strike a balance between:  “protection of the District’s environmental assets and improving the quality of life for all, ensuring that necessary change</p>

Respondent	Response
	<p>and development is sustainable in the interests of future generations”.</p> <p>As part of that strategy a hierarchy of settlements has been outlined which includes Thatcham as one of three ‘Urban Areas’ in the top tier of the hierarchy, along with Newbury, and the Eastern Urban Area (Tilehurst, Calcot &amp; Purley on Thames). This, the Council suggests, allows urban development to be maximised and a combination of strategic urban extensions and smaller sites for housing to be identified.</p> <p>It is the opinion of Croudace Homes that ADDP1, in so far as it relates to the broad distribution and location of new housing, shows a high degree of consistency with the relevant policies of the Framework. In particular, Croudace Homes fully supports the identification of Thatcham as an ‘Urban Area’ in the top tier of the settlement hierarchy reflecting its status as one of the most sustainable settlements in the District to accommodate strategic levels of housing growth.</p> <p>The Council suggests in the Scoping Report that the emerging Local Plan would continue to build on the existing settlement pattern, using the hierarchy of settlements as the focus for development. Croudace Homes therefore supports this approach. It goes on to suggest that the current role and function of all individual settlements would be re-examined to ensure the settlements identified in each category remain the most appropriate.</p> <p>In that context, the Council will be aware that Thatcham is allocated for growth of around 900 dwellings under Policy ADPP3 of the Core Strategy, compared to approximately 1,400 dwellings in the Eastern Urban Area (ADPP4) and 5,400 dwellings at Newbury (ADPP2). The Core Strategy Inspector provides useful guidance in terms of the growth potential at Thatcham when he states that:</p> <p>“65. The Council’s focus on Newbury and the modest level of provision made at Thatcham is not the only approach that could have been pursued. Additional development at Thatcham might be able to contribute to some of the infrastructure improvements and other changes the Council seeks. In the light of the planned review of housing provision, the approach to Thatcham may need to be reviewed if additional housing has to be accommodated in the District”.</p> <p>66. The Council accepts that the policy for Thatcham should acknowledge that the delivery of planned provision will include greenfield sites adjoining the settlement. This is necessary for effectiveness in subsequent delivery. The Council also accepted that one consequence of the policy for Thatcham is that, compared with Newbury, local needs will be addressed far less effectively...”</p> <p>4.6 In formulating the Core Strategy spatial policies, the level of growth at Thatcham was debated. The Council’s policy for relatively modest growth, despite its Main Urban Area status, was influenced by the fact that Thatcham had seen considerable growth in recent years, with the focus being on regeneration and renewal. The Core Strategy Inspector concluded that:</p> <p>“65.... For the present, the approach in the Plan is a justified local choice made by the Council.</p> <p>67. In any overall review to accommodate more housing, Thatcham would be a location to be considered again for additional housing, consistent with its position at the top tier of the settlement hierarchy”.</p> <p>The policy position at Thatcham at that time was not based upon a definitive infrastructure constraint; it was based upon a ‘local choice’ with the Inspector acknowledging that another strategy for higher growth at Thatcham would have, and indeed may be equally appropriate.</p>

Respondent	Response
	<p>It should also be noted that this policy position was established when preparing the Core Strategy in 2009/2010. Nearly a decade has elapsed since the decision was made to give Thatcham a period of consolidation. In that time, Thatcham has seen very modest levels of housing growth, indeed the HSA DPD includes only a single allocation at Thatcham - land at Lower Way, allocated for approximately 85 dwellings.</p> <p>The level of growth at Thatcham is in stark contrast to the other settlements within the top tier of the settlement hierarchy where growth has been substantial. A contrast which is even more stark when the approved development for up to 400 dwellings on Land adjacent to Hilltop, Oxford Road, Donnington, Newbury (APP/W0340/W/16/3143214) is taken into account.</p> <p>Given its position in the settlement hierarchy, its high level of sustainability, the lack of growth over the life of the Core Strategy and comments made by the Appeal Inspector, it is clear that that Thatcham should be expected to accommodate a substantial level of growth within the emerging local Plan. With limited capacity with settlement boundaries (as evidenced through the HSA DPD), this must include sustainable greenfield sites on the edge of the settlement. In that regard, it should be noted that there are no technical issues that would preclude growth at Henwick Park and Croudace Homes consider that it should be allocated for development comprising at least 225 dwellings in the emerging Plan to help meet development needs.</p>
Origin3 Ltd for Sandtrend Ltd	<p>We support the Council's strategy to deliver housing through a combination of strategic urban extensions and smaller sites, which should be identified within a housing trajectory through this LPR process.</p> <p>The adopted Core Strategy spatial strategy applies a three tier settlement hierarchy prioritising and directing growth to Urban Areas (Newbury, Thatcham and the Eastern Urban Area). Rural Service Centres and Service Villages are identified as the next two tiers to accommodate a lesser level of growth commensurate to the scale of the towns and villages.</p> <p>We support the principle of the existing spatial strategy in directing growth to key Urban Areas as they are generally the most sustainable locations to locate new housing, close to existing services, facilities and transport hubs.</p> <p>Newbury is the largest town in West Berkshire with a wide range of employment opportunities, services and facilities. The recent electrification of the rail line between Newbury and Reading will further facilitate faster, direct connectivity to Reading. Newbury therefore remains the most suitable location to direct new growth in West Berkshire.</p> <p>Shaw-cum-Donnington is located immediately north of Newbury and the built environment and road connections are contiguous with Newbury. It therefore forms part of the wider urban area. This should be clarified within the settlement hierarchy, particularly so in light of the recent grant of planning permission at appeal for 401 dwellings at Hilltop in March 2017, directing growth to the north of the town towards Donnington (Application Ref. 14/02480/OUTMAJ).</p> <p>We support the Council's objective to deliver new housing through a combination of urban development, strategic urban extensions and smaller sites to ensure a balanced delivery across the plan period.</p> <p>The existing spatial strategy puts a lot of reliance on delivery at two key strategic sites in Newbury at Sandleford Park (2,000 dwellings) and Newbury Racecourse (1,500 dwellings). Sandleford Park in particular has not delivered at</p>

Respondent	Response
	<p>anticipated rates to date which was a contributing factor to West Berkshire recently being unable to demonstrate a five year supply of deliverable housing sites.</p> <p>Strategic sites can deliver significant benefits in terms of mixed-use development land and infrastructure however they inevitably take significantly longer to come forward. It is understood that the existing Core Strategy housing allocation at Sandleford Park will realistically be developed towards the latter part of the plan period. Opportunities for a new strategic development at Grazely would be of a similar timeframe, if not longer.</p> <p>It is therefore key that the LPR identifies a balanced mix of housing sites to meet OAHN across the plan period particular for years 0-5 and years 6-10, as required by the NPPF.</p> <p>We support the Council's objective to maximise urban development where possible however point out that many of these opportunities have been explored at length through the Core Strategy and Site Allocations Development Plan Documents (DPDs) meaning development at Greenfield sites on the edge of settlements will inevitably be required in the right locations to balance supply.</p> <p>Urban extensions provide one of the most sustainable and appropriate ways of delivering housing, being able to provide a range of housing and crucially, being able to meet local affordable housing need. They allow new homes to be provided in the most appropriate locations taking into account housing need and connectivity (in locations that do not exacerbate existing congested routes), as well as being able to provide significant contributions towards local infrastructure.</p>
Pegasus Planning Group Ltd for Donnington New Homes (re. Long Lane, Newbury)	<p>Yes – the gradual expansion of existing towns and villages through the allocation of appropriately sized sites adjacent to the settlement boundaries is the most appropriate strategy for development to 2036. This strategy is the most appropriate for a number of reasons. Developing new homes on the edges of existing settlements means that existing infrastructure can be utilised and improved. Roads, schools, hospitals/surgery's, shops and other infrastructure already exist, and new development can contribute towards this infrastructure through developer contributions, providing benefits for existing and new residents alike.</p> <p>The prior existence of infrastructure, means that such developments can be built out much more quickly than larger, strategic sites. These strategic sites will require infrastructure to be built from the ground up, which takes time and may delay housing delivery. This means that they contribute towards increasing housing land supply in the short term, alleviating immediate pent-up housing need.</p>
Pegasus Planning Group Ltd for Donnington New Homes (re. Smitham Bridge, Hungerford)	<p>Yes – the gradual expansion of existing towns and villages through the allocation of appropriately sized sites adjacent to the settlement boundaries is the most appropriate strategy for development to 2036. This strategy is the most appropriate for a number of reasons. Developing new homes on the edges of existing settlements means that existing infrastructure can be utilised and improved. Roads, schools, hospitals/surgery's, shops and other infrastructure already exist, and new development can contribute towards this infrastructure through developer contributions, providing benefits for existing and new residents alike.</p> <p>The prior existence of infrastructure, means that such developments can be built out much more quickly than larger, strategic sites. These strategic sites will require infrastructure to be built from the ground up, which takes time and may</p>

Respondent	Response
	delay housing delivery. This means that they contribute towards increasing housing land supply in the short term, alleviating immediate pent-up housing need.
Pro Vision for Rootes Trustees	<p>Generally, yes. A spatial strategy based on supporting the existing settlement hierarchy will continue to promote a sustainable pattern of growth. In the context of West Berkshire, it is demonstrably the best way to meet the three overarching planning objectives - the economic objective, the social objective and the environmental objective. The existing hierarchy does however need to be reviewed. We would, for example question the capacity of the Eastern Urban Area to continue to be a focus for further growth.</p> <p>The existing spatial strategy provides an appropriate framework for identifying opportunities for villages to grow to help support local services and facilities (in accordance with Paragraph 80 of the draft NPPF) and to identify an appropriate supply of small sites.</p> <p>It follows that we can see no justification for considering an alternative spatial strategy that concentrates a substantial proportion of the District's housing growth in a new settlement.</p>
Pro Vision for Cala Group Ltd and Wates Developments Ltd	<p>Generally, yes. A spatial strategy based on supporting the existing settlement hierarchy will continue to promote a sustainable pattern of growth. In the context of West Berkshire, it is demonstrably the best way to meet the three overarching planning objectives - the economic objective, the social objective and the environmental objective. The existing hierarchy does however need to be reviewed. We would, for example question the capacity of the Eastern Urban Area to continue to be a focus for further growth.</p> <p>Hungerford has a range of facilities and services, meeting the requirements of both the rural hinterland and the wider area. It has one of only two town centres identified in West Berkshire's adopted Core Strategy, reflecting the range of facilities and services it provides for the surrounding area. Therefore, the settlement should be elevated in the hierarchy and categorised as an Urban Area where development will be focussed, rather than as a Rural Service Centre.</p> <p>The existing spatial strategy provides an appropriate framework for identifying opportunities for villages to grow to help support local services and facilities (in accordance with Paragraph 80 of the draft NPPF) and to identify an appropriate supply of small sites.</p> <p>It follows that we can see no justification for considering an alternative spatial strategy that concentrates a substantial proportion of the District's housing growth in a new settlement.</p>
Pro Vision for Rivar	<p>Generally, yes. A spatial strategy based on supporting the existing settlement hierarchy will continue to promote a sustainable pattern of growth. In the context of West Berkshire, it is demonstrably the best way to meet the three overarching planning objectives - the economic objective, the social objective and the environmental objective. The existing hierarchy does however need to be reviewed. We would, for example question the capacity of the Eastern Urban Area to continue to be a focus for further growth.</p> <p>The existing spatial strategy provides an appropriate framework for identifying opportunities for villages to grow to help support local services and facilities (in accordance with Paragraph 80 of the draft NPPF) and to identify an appropriate supply of small sites.</p>

Respondent	Response
	It follows, that we can see no justification for considering an alternative spatial strategy that concentrates a substantial proportion of the District's housing growth in a new settlement.
Savills for Englefield Estate	<p>We have no specific comment on the current spatial strategy and the settlement hierarchy upon which this is based. However, we note that there is an opportunity to consider strategic growth, in the form of a new settlement, which would not conform to the current spatial strategy. This spatial strategy therefore needs to be amended to allow for this (see response to Question 5). However, even if the new Local Plan were to support the development of a new settlement, this would not negate the need for appropriate and sustainable new development at the existing settlements in the District, in accordance with the existing spatial strategy. As such a continuation of the existing spatial strategy, based upon the settlement hierarchy set out in Core Strategy policy ADPP1, is supported. Notwithstanding this, the spatial strategy should include provision for a sustainable level of development in rural areas where this would support an economically, social and environmentally strong countryside in line with our response to Q2.</p> <p>It should also be noted that the Local Plan Review will need to take account of emerging national guidance (the Revised NPPF) and that this may have implications for the spatial strategy – e.g. 'entry level exception sites' in rural areas.</p>
Joy Schlaudraff	<p>In the main, yes. Nothing else would work, in general. But for smaller sites, NO. These should be allowed wherever they fit – because they are small!</p>
Turley for A2dominion Housing Group	<p>We agree that the Local Plan Review should direct the majority of development to settlements at the higher end of the settlement hierarchy. However, given the scale of need to 2036, we consider that opportunities should be explored at other settlements, commensurate with their scale. Such a solution may provide opportunities to meet a specific need in an area, address local affordability issues or help to maintain the vitality of the settlement.</p> <p>Furthermore, in relation to Streatley, A2Dominion consider that the Local Plan Review should be prepared on an understanding of the true sustainability of the existing settlement. In this regard, we note that the proximity of some settlements in West Berkshire to settlements within neighbouring authorities, such as Streatley (West Berkshire Council) has implications for the accessibility of those settlements to local facilities. For example, we note that Streatley shares facilities with Goring (in South Oxfordshire District) and that the two are functionally and operationally related. Goring and Streatley are positioned on the Oxfordshire - Berkshire border albeit in the main (apart from in planning terms) they are considered as a single identity. This is most apparent through the Goring and Streatley railway station providing train services between Reading and Oxford and we understand that Streatley provides allotment provision for residents of Goring as the need arises. Facilities in Goring are easily accessible from Streatley.</p> <p>Goring is located 300m to the east of Streatley and easily accessible on foot where a significant number of local facilities are provided and which benefit the existing residents of Streatley, with the two settlements operating interdependently. For context within the South Oxfordshire Core Strategy (2012), Goring is identified as a larger village (Policy CSS1) - a second tier settlement within the hierarchy and therefore acknowledged to be a sustainable location for development. The Settlement Assessment Background Paper (March 2011) identifies the following facilities within Goring: primary school,</p>

Respondent	Response
	<p>doctors, dentist, public park, village hall, 5 + retail shops, pub, bar, pharmacy, Post Office, frequent bus services, railway station providing services between Oxford and Reading.</p> <p>The emerging SODC Local Plan continues to maintain that Goring is a larger village.</p> <p>Core Strategy policy ADDP1</p> <p>With regard to WBC, the settlement hierarchy for the adopted Development Plan is set out at ADDP1. Streatley is not identified as an Urban Area, Rural Service Centre or Service Village. Instead, Streatley is a smaller village with a settlement boundary and defined by Policy ADPP1 as a location where only infill development is considered appropriate. We do not support this position given the proximity of Streatley to a range of local facilities.</p> <p>The Settlement Hierarchy (2012) sets out that Streatley was considered as part of the initial settlement hierarchy study from 2008 and was assessed as a rural settlement given it was assessed as having '7 or more local facilities/ services'. As part of the 2012 assessment, a re-assessment of the settlements within the District was undertaken to reflect comments on the methodology. One such comment raised by the West Berkshire LDF Working Group considered the proximity to settlements such as Tadley and Goring (page 11), which is relevant to our comments relating to the settlement of Streatley. The assessment concluded the following:</p> <p>"Consideration of proximity to Goring and Tadley:</p> <p>There were comments received that there should be more consideration of cross border interaction, particularly the effects that Reading, Goring and Tadley have on settlements in West Berkshire. Previously in this report account has been taken of proximity by road to Newbury and Reading. The result being that some settlements received minor scores while most did not receive any additional points. Close proximity to the towns of Goring and Tadley, located outside the District boundaries, would be beneficial to those settlements located in the north east and south east of the District and in very close proximity to Goring or Tadley, yet it is considered that these towns are not significant enough to have any major impacts on the majority of settlements in the District."</p> <p>Given the continued identification of Goring with the SODC adopted and emerging Local Plans as a larger village where new development is considered appropriate given the sustainability of the settlement, and the relationship that this has with Streatley, we consider that it is essential for the West Berkshire settlement hierarchy to have regard to the presence of these nearby services. The 2012 Assessment did not consider the interrelationship between Goring and Streatley and in our view that would have resulted in Streatley being given a significantly higher settlement score than was recorded within the Assessment.</p> <p>By way of an example, Streatley scored O against distance with only Reading or Newbury (major urban areas) being considered as providing higher order goods. Whilst this is not directly comparable to Goring, Goring itself does provide a range of facilities within a short distance of Streatley that improve its sustainability with the facilities benefitting residents of Streatley (i.e. the supermarket and station) resulting in a lower requirement to travel further afield by car than other identified service villages or rural service centre identified within ADDP1. This is equally applicable to cycling opportunities where the assessment considered cycle routes and proximity to facilities. Streatley itself is on a cycle route with facilities within Goring accessible on foot or via cycle within 300m. Significant weight should also be attached to the proximity of Streatley to Goring station. This should be considered as part of any updated spatial strategy.</p>

Respondent	Response
	<p>Streatley delivers a number of local facilities which when considered in combination with Goring, the settlement benefits from a range of local facilities which are within walking distance of the settlement (albeit within two different local authority areas). On this basis, we consider that Streatley should be considered at least a service village when assessed against the Core Strategy settlement hierarchy, but with characteristics of a Rural Service Centre. This is reflective of the positioning of Goring with the SODC settlement hierarchy as a larger village.</p> <p>Given the opportunities are being considered elsewhere (as cited at paragraph 5.8 of the Scoping Report) on account of the requirements by the Framework for 'potential cross boundary joint working opportunities' (paragraph 157 of the Framework), this is equally applicable Streatley which should be more robustly considered through the emerging evidence base to the Local Plan Review.</p>
Turley for North East Thatcham Consortium	<p>The existing spatial strategy set out in section 4 of the Core Strategy acknowledges that <b>“Not all development can be accommodated within the District’s urban areas”</b>. The Consortium considers that will remain the case and as such it is essential that the spatial strategy for the Local Plan Review acknowledges this and provides the ability for development to be delivered outside of existing urban areas.</p> <p>The Consortium agrees that the spatial strategy should be underpinned by a settlement hierarchy based upon the existing and future role and function of settlements within West Berkshire. The Consortium considers that the majority of growth should take place at (within and adjacent to) the urban areas at the higher end of the hierarchy.</p> <p>On that basis, the Consortium agrees that most development will take place in Newbury, Thatcham and in the settlements in the east of the District close to Reading.</p> <p>The Consortium considers that the access to services and facilities of these areas and the opportunities they provide to reduce out-commuting and the need to travel is an appropriate basis to support the spatial strategy. It is equally apparent that the support for higher levels of provision within these larger settlements will be critical in supporting the delivery of infrastructure needs (physical and social) which are of significant importance in ensuring that these urban areas remain vital and viable.</p> <p>It is apparent that over the Core Strategy period the urban areas have been contributing a proportionately significant level of housing provision, in accordance with the existing spatial strategy. Thatcham, for example, has broadly delivered against the requirement set through the Core Strategy with provision only 20 dwellings lower than the requirement over the last nine years for which monitoring data is available (2008/09 – 2016/17). As referenced in the preceding question, however, the level of housing provision directed at Thatcham when compared to Newbury for example, was notably and deliberately modest.</p> <p>Whilst this was at least in part justified on the basis of the level of development previously seen in Thatcham it is evident that over the Core Strategy period the policies restricting development at the town means that it is no longer the context against which the Local Plan Review is based.</p> <p>The Council’s latest evidence of housing need (SHMA 2016) confirms that there will need to be a boosting of supply from the levels which have been provided over the Core Strategy plan period to date (500 homes per annum; 2006 – 2017). Following the existing spatial strategy the urban areas at the top of the hierarchy will need to individually and collectively</p>

Respondent	Response
	<p>elevate the levels of homes being delivered to ensure housing needs are met sustainably. It is noted that the in the Inspector's Report on the Core Strategy, the Inspector specifically referenced that: <b><i>“Additional development at Thatcham might be able to contribute to some of the infrastructure improvements and other changes the Council seeks. In the light of the planned review of housing provision, the approach to Thatcham may need to be reviewed if additional housing has to be accommodated in the District.”</i></b></p> <p>The Core Strategy spatial strategy included a specific section on Thatcham. This recognised its identification as one of the four urban areas and the specific issues facing the town. The Consortium agrees that support should continue to be given to the aspiration of regenerating Thatcham town centre. This continues to be important both in terms of its role in serving its local population but also the surrounding rural areas and in recognition of the fact that there has been limited progress in this regard over the Core Strategy period to date.</p> <p>In addition, the Consortium also supports the continuation of a strategy which seeks to see Thatcham becoming a more self-contained settlement which provides a more range of job opportunities and encouraging residents to shop and socialise locally. The Consortium considers that the delivery of new infrastructure at Thatcham will be fundamental to the achievement of this objective to ensure that the needs of current and future generations of residents are met. This is particularly the case given the Council's acknowledgement of the education capacity issues at Thatcham.</p> <p>Whilst this vision for Thatcham is supported, it is apparent that the approach taken in the Core Strategy to essentially restrain growth through the limited provision of housing has inhibited its realisation. The Consortium considers that the Core Strategy spatial strategy and approach to Thatcham was one of restraint, reflecting the Council's concerns regarding infrastructure capacity at the town and a perception that it had seen considerable housing growth in recent years. In accordance with the Core Strategy the scale of development in the town has been modest. The Council has, however, acknowledged the sustained need to address infrastructure shortcomings, particularly in relation to education. In establishing a new spatial strategy for the District, the Consortium therefore considers that this should be underpinned by the aspiration of addressing the infrastructure issues at Thatcham and providing a situation whereby the opportunities to regenerate the town centre are maximised. The town is also well-placed to build upon its existing role as a key commercial centre, both as a localised office market and a more prominent strategic industrial location. The latter has been supported by the more recent development of modern, better quality industrial space, as acknowledged within the Council's economic evidence.</p> <p>The Core Strategy spatial strategy also acknowledged the high quality environment. The Consortium considers that this should also inform the spatial strategy for the Local Plan Review, particularly in relation to the large amount of the District which falls within the North Wessex Downs Area of Outstanding Natural Beauty.</p> <p>The Core Strategy spatial strategy set out in Area Delivery Policy 1 indicated that <b><i>“The majority of development will take place on previously developed land”</i></b>. The Council will need to consider whether such opportunities exist in order to inform the Local Plan Review and even if such sites are available, it will be necessary for the Council to consider in a holistic manner whether they would be the most appropriate solution to achieve sustainable development. Alternative solutions may provide the opportunities for large scale development whilst delivering significant levels of new infrastructure.</p>

Respondent	Response
	<p>The Core Strategy spatial strategy acknowledged the presence of the AWE facilities at Aldermaston and Burghfield. The Consortium considers that it is essential that this also informs the strategy for the Local Plan Review and the associated cooperation between West Berkshire Council and Wokingham Borough Council regarding development near the border of the two authorities.</p>
Turley for Berfeld Limited	<p>We consider that the spatial strategy should ensure that sufficient homes are provided in locations where people wish to live. There are some sustainability benefits from focusing new homes within or adjacent to existing settlements, but the concept of sustainability is complex and broad. It has many facets and restricting new development to locations that are within or adjacent to existing settlements does not allow for developments that are not in this situation to come forward, even if they are sustainable.</p> <p>There is also little recognition of the potential for technological change over the period of the Local Plan to 2036. Within that period, it is highly likely that sustainable electric vehicles will become prevalent, and improved technology will also mean people are less likely to need to access towns to access services. Technological change will challenge current interpretations of sustainable development and the Council should ensure there is sufficient flexibility in the wording of its policy to allow for this change.</p> <p>We therefore consider that it is appropriate to focus development on existing settlements, but to also ensure that there is flexibility built into the policy to allow for the consideration of development that is capable of achieving sustainability outside of a normative and narrow interpretation.</p>
Turley for Commercial Estates Group	<p>The existing spatial strategy has been surpassed by events, such as the publication of the Berkshire (including South Bucks) Strategic Housing Market Area Assessment (SHMA), as well as cross-boundary issues that have arisen. As such, it is considered that the emerging Spatial Strategy should be revised such that it accords with an up-to-date evidence base and responds effectively to prevailing planning issues. This may result in the existing strategy being carried forward but it would be premature to make that decision prior to the evidence being produced and thoroughly reviewed.</p> <p>Accordingly, we maintain that the Core Strategy Review should make provision for an evidence-based review of the existing settlement hierarchy established at Policy ADPP1. This will be necessary to establish a robust spatial strategy, particularly as the existing typology may no longer be entirely consistent within the context of a cross-boundary approach being pursued through the West of Berkshire Spatial Framework.</p> <p>However, it is nevertheless clear that the greater part of future development should be directed towards settlements at the higher-end of the hierarchy, with these being generally the more sustainable development locations such as Newbury, Thatcham and the Eastern Urban Area.</p> <p>It is also clear that effective forward planning in West Berkshire will require that a diversity of sites are allocated for development, so as to maximise opportunities for achieve sustainable development, whilst further planning for new infrastructure and additional services. This is of particular relevance adjacent to the existing or consented development, where that infrastructure is already in place / planned for and new development can be both supported by it and can help to enhance / grow that provision.</p> <p>With respect to the Duty to Cooperate, we agree that the preparation of a West of Berkshire Spatial Planning Framework</p>

Respondent	Response
	<p>provides a suitable mechanism for planning on a cross-boundary basis, within this respective part of the SHMA area. However, we caution that (in drawing from this non-statutory document) it will be important for the Local Plan process to provide robust evidence to justify the decisions that have been reached, including if these decisions have been reached collaboratively, as part of the SPF.</p> <p>The importance of a robust approach on this matter has been clearly demonstrated through the recent West Oxfordshire Local Plan Examination in Public (EiP), where key decisions were taken through non-statutory processes under the auspices of the 'Oxfordshire Growth Board'. The EiP served to highlight the importance of ensuring that non-statutory (and cross-boundary) decision making-processes are supported by an appropriate and robust evidence base. Likewise, non-statutory decisions (regarding, for example, the distribution of housing growth) to be reconciled with the findings of a (statutory) Local Plan's Sustainability Appraisal.</p> <p>It is positive that the West of Berkshire Spatial Framework and the Local Plan Review Scoping Report (at paragraph 5.7) recognises the continued importance of cooperation and cross-boundary issues between West Berkshire, Wokingham, Reading and Bracknell Forest. However, we express concern that Local Plan Review's focus on the West of Berkshire Spatial Framework, shall effectively serve to preclude or downgrade cooperation with authorities situated to the east. This is concerning in itself, but particularly so as cross-boundary housing and economic issues are not self-contained within the Western HMA.</p> <p>Accordingly, the West of Berkshire authorities (including West Berkshire) should not seek to preclude the potential requirement to accommodate at least part of the significant quantum of need, which may not be effectively met within the boundaries of the authorities to the east.</p> <p>Furthermore, we are also concerned that there is a risk that the Local Plan Review will reflect the limitations of the SHMA (and indeed the Western Berkshire Economic Development Needs Assessment, 2016), with respect to analysing the impacts of major planned investments in economic infrastructure. Indeed, the SHMA (at paragraph 5.50) explains that it does not account for;</p> <p>"competitive position of Berkshire and South Buckinghamshire in terms, for example of specific infrastructure investment, which might have both positive or negative impacts on inward investment and business growth; for example, the introduction of services on Crossrail, or the provision of a western rail access to Heathrow" (SHMA para 5.50).</p> <p>Such economic investments will invariably impact upon the dynamics of the regional economy and housing markets. We therefore consider that it is essential for the Local Plan Review to be based on robust evidence, which evaluates the implications of the infrastructure investments described. If the Plan is not informed by such an analysis, we would consider that there is a risk of it failing to properly address the housing pressures and affordability issues that may arise.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>The current spatial strategy as set out in the Core Strategy builds on the existing settlement pattern, and this is generally supported. However, the settlement hierarchy set out in paragraph 5.2 of the Scoping Report (February 2018) only relates to the larger settlements of:</p> <ol style="list-style-type: none"> <li>1. Urban Areas;</li> <li>2. Rural Service Centres;</li> </ol>

Respondent	Response
	<p>3. Service Villages.</p> <p>No reference is made to the many villages below the settlement hierarchy which have got defined settlement boundaries, such as Hampstead Norreys.</p> <p>The generally urban focus is further emphasised by paragraph 5.3 which states: <b><i>'In this context, urban development is maximised and a combination of strategic urban extensions and smaller sites for housing have also been identified for development.'</i></b></p> <p>This urban focus needs to be counterbalanced by a similar emphasis on the need to also support vibrant rural communities. For example, Hampstead Norreys, is a vibrant village with a primary school; community shop; sports pitches; village hall; church; and public house. The future of these facilities depends on a mixed community in which all age groups are represented. There is therefore the need for some additional housing to satisfy local needs, including those who have a local connection or need to work in the village, and thereby ensure that young people and families will continue to have the opportunity to live there.</p>
Woolf Bond Planning for Donnington New Homes	<p>Area Delivery Plan Policy 1 (Spatial Strategy) of the current 2012 Core Strategy provides:</p> <p>'Below the settlement hierarchy there are two additional types of area where there will be more limited development, including affordable housing for local needs:</p> <ul style="list-style-type: none"> <li>• <b>smaller villages with settlement boundaries - suitable only for limited infill development subject to the character and form of the settlement',</b></li> </ul> <p>It follows that under the existing spatial strategy, the Core Strategy does not provide for the ability to extend smaller villages with defined settlement boundaries. We consider there would be strong benefit in changing this approach and explicitly identifying sustainable and appropriate extensions to smaller villages in certain locations in the District. We refer to three parts of the emerging draft NPPF that support and advocate such an approach:</p> <p>Paragraph 80 refers to the importance of plans needing to identify opportunities for villages to grow:</p> <p>'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should <b>identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'</b>.</p> <p>The above statement is not specific to any given size of village, it simply requires that sustainable development should be promoted in rural areas and plans should identify opportunities for such settlements to grow. It follow that any <b><u>decision to continue to exclude the ability to extend smaller villages with boundaries (as per the existing spatial strategy) would fail the 'consistent with national policy' test of soundness.</u></b></p> <p>Paragraph 118 goes onto state:</p> <p>'Planning policies and decisions should:</p> <p><b>d) promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more</b></p>

Respondent	Response
	<p><b>effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure)36;'</b></p> <p>The approach advocated at paragraph 80 of the draft NPPF is further supported by paragraph 118 that specifically acknowledges the benefits of promoting and supporting the development of under-utilised land. One such under utilised sustainable development opportunity exists at our client's site at Ashmore Green Farm (discussed in further detail below). Further, paragraph 69 refers to the need for 20% of housing in new local plans to be 'small sites':</p> <p>'Small sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p> <p><b>a) ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less';</b></p> <p>The above acknowledges the important role smaller sized sites can play in new Local Plans and their importance in adding to the diversity in the types of housing sites allocated to contribute towards challenging housing targets. Whilst not strictly a small site on the basis of its site area, our client's site by forming a capacity of up to 30 no. dwellings (net 29) can justifiably be described as a small site and would add to the overall diversity of housing sites if allocated in the future plan.</p> <p>Ashmore Green forms a settlement well related to two of the District's 'Urban Areas' (Newbury and Thatcham) that are home to a wide range of services and form the focus for the majority of development in the existing plan. The village is located under 1 mile from the edge of Thatcham and is home to a bus service (No. 41) that provides regular connections to the 'Urban Areas'. In addition, the settlement is located approximately half a mile away from the 'Service Village' of Cold Ash. In addition unlike much of the District, the settlement is located outside the nationally protected North Wessex Downs Area of Outstanding Natural Beauty.</p> <p>Our client's site adjoins the Ashmore Green settlement area and forms land already home to a series of large buildings that have not been in an active use for a long period of time, over 20 years. It follows that our client's site represents one of the most sustainable locations in helping to meet the District's housing requirements, through delivering smaller sites to aid in immediate housing delivery. It forms a natural extension to the settlement boundary and offers the potential to have positive impacts upon the character and appearance of the wider locality. In addition, by forming a potential smaller site from land that is redundant, it specifically complies with emerging NPPF policy referenced above.</p> <p>For the above reasons we are of the strong view that an <b><u>extension to Ashmore Green should occur and accordingly the subject 1.5ha site, forming land adjoining Ashmore Green should be identified in the emerging plan as a housing allocation.</u></b> The site could be delivered inside a 5 year period and therefore soon after the adoption of the plan.</p>
Woolf Bond Planning for JJP Land	<p>Area Delivery Plan Policy 6 (The East Kennet Valley) of the current 2012 Core Strategy indicates:</p> <p>'The two identified rural service centres of Burghfield Common and Mortimer will be the focus of development in this area',</p> <p>The acceptable scale of development around Burghfield Common is confirmed through the allocation of sites within the Council's Housing Site Allocations Local Plan (2017). Policy HSA15 allocates land adjoining Pondhouse Farm, Burghfield</p>

Respondent	Response
	<p>Common for approximately 100 dwellings with policy HSA16 allocating land to the rear of The Hollies, Burghfield Common for approximately 60 dwellings.</p> <p>It follows that under the existing spatial strategy, the Core Strategy enables multiple sites of around 100 dwellings to be allocated on the edge of Burghfield Common. We consider the emerging plan needs to retain the ability of sustainable rural service centres like Burghfield Common to accommodate further growth.</p> <p>Allowing further growth at Burghfield Common is consistent with paragraph 80 of the emerging draft NPPF which highlights the importance of plans needing to identify opportunities for villages to grow:</p> <p>'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'.</p> <p>Our client considers that there is currently an anomaly regarding the settlement boundary for Burghfield Common through its exclusion of the established residential developments off Rowan Way and Caxton Gate. These are the largest established residential schemes within West Berkshire which adjoin a settlement rather than are incorporated within. Given the number of dwellings on these developments and its clear linkage to the settlement boundary of Burghfield Common, these dwellings should be incorporated within it. The consistency of the character of these residential areas with Burghfield Common village reinforce our view that these dwellings must be included within the settlement boundary. Through including the established residential area off Rowan Way and Caxton Gate within Burghfield Common's settlement boundary results in our clients' land at Brook House Farm being a logical addition to the settlement. Our clients scheme for 40 dwellings is consistent with the scale of schemes which the Council has allocated to the village through their Housing Site Allocations Local Plan.</p> <p>For the above reasons we are of the strong view that an extension to Burghfield Common should occur and accordingly the subject 2.9ha site, forming land at Brook House Farm should be identified in the emerging plan as a housing allocation. The site could be delivered inside a 5 year period and therefore soon after the adoption of the plan.</p>
Woolf Bond Planning for Donnington New Homes	<p>Area Delivery Plan Policy 1 (Spatial Strategy) of the current 2012 Core Strategy provides:</p> <p>'Below the settlement hierarchy there are two additional types of area where there will be more limited development, including affordable housing for local needs:</p> <ul style="list-style-type: none"> <li>• <b>smaller villages with settlement boundaries - suitable only for limited infill development subject to the character and form of the settlement'</b>,</li> </ul> <p>It follows that under the existing spatial strategy, the Core Strategy does not provide for the ability to extend smaller villages with defined settlement boundaries. We consider there would be strong benefit in changing this approach and explicitly identifying sustainable and appropriate extensions to smaller villages in certain locations in the District. We refer to two parts of the emerging draft NPPF that support and advocate such an approach:</p> <p>Paragraph 80 refers to the importance of plans needing to identify opportunities for villages to grow:</p>

Respondent	Response
	<p>'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Plans should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby'.</p> <p>The above statement is not specific to any given size of village, it simply requires that sustainable development should be promoted in rural areas and plans should identify opportunities for such settlements to grow. It follows that any <b><u>decision to continue to exclude the ability to extend smaller villages with boundaries (as per the existing spatial strategy) would fail the 'consistent with national policy' test of soundness.</u></b></p> <p>Further, paragraph 69 refers to the need for 20% of housing in new local plans to be 'small sites':  'Small sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p> <ol style="list-style-type: none"> <li>1. <b>a) ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less';</b></li> </ol> <p>The above acknowledges the important role smaller sized sites can play in new Local Plans and their importance in adding to the diversity in the types of housing sites allocated to contribute towards challenging housing targets. Whilst not strictly a small site on the basis of its site area, our client's site by forming a capacity could be described as a small site if allocated for a mix of residential and associated uses and would add to the overall diversity of housing sites if allocated in the future plan.</p> <p>Curridge forms a settlement located close to the District's largest 'Urban Area' (Newbury) that is home to a wide range of services and forms the focus for the majority of development in the existing plan. In addition, Curridge benefits from a primary school and the settlement is located in close proximity to the 'Service Village' of Hermitage and the Strategic Road Network in the form of the M4 motorway.</p> <p>Our client's site adjoins the Curridge settlement area on its southern and eastern boundaries and provides the opportunity to adjoin the two parts of the village in a holistic plan led manner. This could include associated community uses that could form a focal point and pedestrian access between the two presently detached parts of the settlement. It follows that our client's site represents one of the most sustainable locations in helping to meet the District's housing requirements. It forms a natural extension, to join the two separate settlement boundary areas of Curridge. In addition, it could be considered to form a potential smaller site and therefore complies with emerging NPPF policy referenced above.</p> <p>For the above reasons we are of the strong view that an <b><u>extension to Curridge should occur and accordingly the subject 4.16ha site, forming land adjoining Curridge should be identified in the emerging plan as a housing allocation.</u></b> The site could be delivered inside the 5 year period and therefore soon after the adoption of the plan.</p>
WYG for Donnington New Homes	<p>Donnington New Homes support West Berkshire's proposal to continue to build on the existing settlement pattern which will continue to use a hierarchy of settlements as the focus for development. Adopted Core Strategy Policy ADPP1 designates Newbury as an urban area with a wide range of services and the focus for the majority of development. A southern extension to Sandford Park would support this approach and also support the provisions of paragraph 5.3 and 5.7 of the consultation document.</p>

## Summary of responses

The majority of respondents stated that they thought the existing spatial strategy had worked well and that it would continue to be the most appropriate approach for development up to 2036 in West Berkshire. With one exception, this included all parish councils and neighbourhood planning groups. The parish council that disagreed argued for further consideration to be given to garden villages where it felt that infrastructure needs and a community sense of place could be considered more holistically. The development industry highlighted the fact that the spatial strategy would need to be altered in order to accommodate a new settlement and were divided as to whether this was a good idea.

The capacity of the Eastern Urban Area to accommodate more growth was questioned, particularly the tension that exists between the need for development in the area and its location on the edge of the AONB. The role of Thatcham was also raised, with the expectation that following a period of restraint in the current plan, there was now an opportunity to plan for a period of growth.

There were some respondents who felt that whilst the spatial approach itself was acceptable in principle, the Council will need to re-examine the settlement hierarchy which supports it, in more detail, in order to establish the role and function of each settlement in each area. Specific concerns were raised, from both the development industry and some local communities that certain settlements were not now in the right category. Another suggested that a new category of 'principal rural service centres' could be introduced whilst others thought that smaller villages and the rural areas themselves should also be included. The relationship that some settlements on the edge on the District have with settlements in adjoining authorities was also raised.

It was generally considered that a review of settlement boundaries for all settlements will be an important part of the Review and that this process should then be used to inform the overall spatial strategy for the District. A couple of respondents from the development industry felt the Council needed more evidence before it could make any decisions.

Overall, the development industry felt the Council needed to be more flexible in its approach to rural settlements, particularly to those which currently sit below the current hierarchy. There were also suggestions from a few site promoters that more development, particularly in smaller villages, would help prevent the further loss of rural services.

## Council response

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR).

The support given to the continuation of the existing spatial strategy is welcomed but the capacity of the Eastern Urban Area to accommodate future growth is an issue which requires further consideration. The Council will therefore review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries. A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

#### Q4: Do you agree that dividing the District into different geographical areas is still the most appropriate way to deliver the spatial strategy?

Number of responses received: 41

Respondent	Response
<b>Internal</b>	
Archaeology Team West Berkshire Council	Generally yes, but Character studies should also be factored in, especially if these do not align with the geographical areas – eg Historic Environment Character Zoning documents <a href="http://info.westberks.gov.uk/index.aspx?articleid=30418">http://info.westberks.gov.uk/index.aspx?articleid=30418</a>
Public Transport Team West Berkshire Council	I agree that dividing the District into the four main geographical areas as reflected in section 4.7 of the Spatial Strategy remains the most appropriate way to deliver the strategy, as this approach – coupled with the associated Area Delivery Plan Policies – takes into account the distinctive features of these distinguishable areas of the District
<b>Statutory consultees</b>	
Stratfield Mortimer Parish Council	Because of the arguments put forward in the previous answer a more District wide approach should be adopted. This becomes even more imperative when working with adjacent planning authorities on potential developments that cross district boundaries. That is not to say that recognition of the different characteristics of different part of the Districts should not be recognised, rather that should just be one consideration amongst many equally important factors.
Streatley Parish Council	Streatley Parish Council agrees that the 4 geographic areas for the district are still most appropriate, especially the AONB.
Hermitage Parish Council	Yes. This is the only question that Hermitage PC is confident to answer.
Pangbourne Parish Council	Yes because it continues to build on the existing settlement pattern.
Burghfield Parish Council	Yes. It worked well in relation to the current Local Plan and I see no reason to change it.
Burghfield NDP Steering Group	Yes. It worked well in relation to the current Local Plan and we see no reason to change it.
Environment Agency	This question is not within our remit. However our advice to you is to carry out the sequential test for fluvial flood risk when considering the location of development.

Respondent	Response
Sport England	Yes, it allows responses/actions to be focused and relevant to specific areas, rather than a broad brush policy approach which may not always be appropriate.
Savills for Thames Water	Yes
<b>General consultation bodies</b>	
British Horse Society	It seems appropriate from an equestrian point of view.
<b>Other stakeholders</b>	
Christopher Gent	The division of the District into different geographic areas is a good idea as it enables an assessment of whether an appropriate balance has been achieved between development and countryside and affords a focus on whether there is sufficient infrastructure in each area.
William Graham	Yes
Neil Richardson	These seem to be appropriate but likely to be affected by large scale development south of Reading?
Robert Wallace	No as above
<b>Landowners, site promoters and developers</b>	
Barton Willmore for Graham Child	Our client notes at paragraph 5.6 that the Scoping Report suggests that the geographical areas “...reflect the distinct characteristics of the different parts of the District”. However as part of the Local Plan Review the Scoping Report explains that the Council “...propose to re-examine whether this continues to remain the most appropriate way to deliver the spatial strategy to 2036”. We would submit therefore that the baseline evidence is required before concluding that this is the most appropriate way to deliver the spatial strategy.
Barton Willmore for Sulham Estate	On behalf of our client, we support the Council’s intention within the Local Plan Review Scoping report to re-examine whether the geographical areas continue to remain the most appropriate way to deliver the spatial strategy. Without seeing the Council’s methodology, evidence base or eventual conclusions for this is it not possible to provide detailed comments. Nevertheless, we consider that this review is an important part of providing a holistic approach to meeting needs throughout the District.
Bewley Homes	We do not agree that dividing the Borough into geographical areas is an appropriate way to deliver the spatial strategy. A more sophisticated test should be applied assessing the sustainability of individual settlements.

Respondent	Response
	<p>The historic 'geographical area' approach is considered too blunt a tool, which can allow the overlooking of settlements which offer a range of local services, and regular public transport links to employment centres both within the Borough and further afield.</p> <p>Following a settlement hierarchy approach, setting out the most sustainable towns and villages, with individual settlements assessed would be a more appropriate and allow housing to be allocated flexibly across the Borough. Woolhampton, for example is an established built up area identified as a 'Service Village' that is within the East Kennet Area. The village is served by a range of day to day services and facilities and has good access to both passenger transport services and local road networks. Details of the level of services provided are set out under Question 7. The settlement also falls outside of the North Wessex Area of Outstanding Natural Beauty landscape designation which restricts development across much of the Borough.</p>
Boyer Planning for Spitfire Bespoke Homes	Spitfire do not object to this approach but note that any potential growth at Grazeley should not restrict growth of other sites, particularly where this supports early and sustainable residential growth in villages in line with the draft NPPF.
Mark Carter for Mr R.L.A. Jones	<p>As with Question 3 above the Respondent considers that the existing method of examining the four main geographical areas of the District is the most appropriate way to examine future policies (and also the settlement hierarchy within those areas) is the most appropriate for the District.</p> <p>Within the North Wessex Downs Area of Outstanding Natural Beauty Lambourn still has a range of services and reasonable public transport provision which also serve the requirements of surrounding communities and these should be reinforced.</p> <p>Although there is much discussion about the role of surrounding Districts in meeting housing need these Districts are already heavily constrained and are unlikely to contribute. West Berkshire should be looking to meet its own (housing) needs within its boundaries.</p>
Fisher German for Mr Musgrave and Begley	The division of the District into geographical areas is not considered to be the most appropriate strategy. It is considered that development should be directed to settlements within the settlement hierarchy. For example, 60% to the urban areas, 25% to the rural service centres, and 15% to the service villages.
Gladman Developments	Gladman support the Council's proposal to re-examine whether the approach of establishing four geographical areas (Newbury and Thatcham, The Eastern Area, North Wessex Downs and East Kennet Valley) continues to be the most appropriate way of delivering the spatial strategy.
Hallam Land Management	Planning development within the confines of District boundaries is not an effective way to plan sustainable growth and West Berks along with its partners in the Western Berkshire Housing Market Area should be applauded for the work they have completed to date in considering opportunities across the Housing Market Area. Dividing the District into different geographical areas, imposing arbitrary boundaries and distributing the housing requirement accordingly sits uncomfortably with the more strategic approach to planning which is emerging and has the potential to lead to parochial decisions and compromise opportunities for sustainable patterns of growth. It is our view, therefore, that as part of the

Respondent	Response
	Local Plan Review a very different approach should be adopted with the West Berkshire Local Plan forming an integral part of the Western Berkshire Strategic Plan as opposed to being wholly District focused and compartmentalised into smaller parcels.
Nexus Planning for Croudace	<p>The District is currently divided into four main geographical areas as follows:</p> <ul style="list-style-type: none"> <li>• Newbury and Thatcham;</li> <li>• The Eastern Area – including the Eastern Urban Area;</li> <li>• North Wessex Downs AONB;</li> <li>• The East Kennet Valley.</li> </ul> <p>Given their geographical proximity and functional relationship as the largest and most sustainable settlements within the District, Croudace Homes considers that combining Thatcham and Newbury into a single distinct area remains an appropriate strategy for delivering growth.</p> <p>There is a rationale for retaining the remaining areas in their current form as reflection of the different geographical areas of the District. Croudace Homes would therefore have no objection to retaining these areas as set out.</p>
Nexus Planning for Pangbourne Beaver Properties	<p>The District is currently divided into four main geographical areas as follows:</p> <ul style="list-style-type: none"> <li>• Newbury and Thatcham;</li> <li>• The Eastern Area – including the Eastern Urban Area;</li> <li>• North Wessex Downs AONB;</li> <li>• The East Kennet</li> </ul> <p>The North Wessex Downs AONB washes over the village of Pangbourne. The Core strategy states:  “4.38 The North Wessex Downs AONB covers 74% of West Berkshire and makes a significant contribution to the uniqueness of the District. The settlement pattern will be maintained as both distinctive and ancient with a small and dispersed population within villages and small towns that have a strong sense of identity. The AONB will have appropriate sustainable growth throughout the plan period to support the local communities and rural economy.”</p> <p>It also states:  “4.41 Pangbourne will remain an accessible thriving village community in an attractive and accessible setting within the AONB and will serve as a rural service centre for the surrounding villages. Small scale extensions in keeping with the existing character and pattern of development and in line with Pangbourne’s role as a rural service centre will help address issues of local housing need and provide opportunities for local people to buy a home in the village. The thriving district centre will continue to provide a good range of retail and leisure facilities, in the form of shops, pubs and restaurants. The diverse range of retail and leisure outlets will also help to form an important tourism base.<i>4.42 The service villages will continue to meet the needs of their residents and surrounding communities for facilities and services. Some small-scale development will have taken place to meet local needs, support the rural economy and sustain local facilities.</i>”</p>

Respondent	Response
	The four geographical areas are appropriate as a broad objective but this needs to be balanced against the amended settlement hierarchy that is proposed in para 4.4 above.
Pegasus Planning Group for Donnington New Homes	<p>Yes – this will ensure that homes are spread evenly across the District to most effectively meet housing need, and will ensure that the supply of housing land in the District is not over reliant on a small number of large-scale strategic sites which will concentrate development in certain areas of the District.</p> <p>Dividing the District into several geographical areas will allow the correct scale and style of development to be delivered in different areas across the District, given the distinct characteristics of each of the areas in question. Newbury and Thatcham are heavily developed, urban areas, and the focus of the highest density development in the district. The Eastern Area is a mix of more open, rural areas and urban, built-up areas such as Calcot, Purley on Thames and Tilehurst, whilst the North Wessex Downs Area of Natural Beauty is a predominantly open and rural area with very little development, aside from a few rural service centres and service villages. The East Kennet Valley is also predominantly rural, but includes some large employment sites such as AWE Aldermaston and Burghfield, which can restrict residential development given their associated risks. Given these differences, it is prescient to plan for each of them individually.</p>
Pegasus Planning Group for Donnington New Homes	<p>Yes – this will ensure that homes are spread evenly across the District to most effectively meet housing need, and will ensure that the supply of housing land in the District is not over reliant on a small number of large-scale strategic sites which will concentrate development in certain areas of the District.</p> <p>Dividing the District into several geographical areas will allow the correct scale and style of development to be delivered in different areas across the District, given the distinct characteristics of each of the areas in question. Newbury and Thatcham are heavily developed, urban areas, and the focus of the highest density development in the district. The Eastern Area is a mix of more open, rural areas and urban, built-up areas such as Calcot, Purley on Thames and Tilehurst, whilst the North Wessex Downs Area of Natural Beauty is a predominantly open and rural area with very little development, aside from a few rural service centres and service villages. The East Kennet Valley is also predominantly rural, but includes some large employment sites such as AWE Aldermaston and Burghfield, which can restrict residential development given their associated risks. Given these differences, it is prescient to plan for each of them individually.</p>
Pro Vision for Rootes Trustees	Yes
Pro Vision for Cala Group and Wates Developments	Yes
Pro Vision for Rivar	Yes
Savills for Englefield Estate	No specific comment is made at this stage, although the Council will need to consider how any new settlement might appropriately fit into this division by geographical area.
Joy Schlaudraff	YES, definitely. Exceptions, see above.

Respondent	Response
Turley for Commercial Estates Group	We do not consider that it is possible to provide an answer to this question until such time as the evidence-base has been updated, such that a properly justified and reasoned approach can be formed. Accordingly, we would simply suggest that the Local Plan Review considers the effectiveness of a sub-area approach against possible alternative options as well as its appropriateness in relation to the different characteristics across the District. We do, however, agree that a settlement hierarchy identifying the most sustainable settlements as the focus for the largest proportion of development is appropriate.
Turley for Berfeld Limited	We understand the rationale of dividing the District into four geographical areas, but we consider that the Council has a tendency to apply these artificial boundaries too rigidly in plan making and decision taking. For example, allocating housing delivery on fixed and inflexible figures to each spatial district based on assessed housing need across the whole Western Berkshire Strategic Housing Market Area, is inflexible and does not lead to the best plan making or decision taking. It may be appropriate to set out approximate targets for new homes across the spatial districts, but the policy wording should state that these are approximate and that there is scope to deviate from target figures. This would allow for more flexible decision taking to ensure that the overall presumption in favour of sustainable development is met.
Turley for A2dominion Housing Group	We consider that it is appropriate to establish policies for different parts of the District bearing in mind their different characteristics. Insofar as Streatley is concerned, we consider that this approach should have regard to the proximity of the settlement to Goring and the accessibility to local services and facilities and the interrelationship between the two locations.
Turley for North East Thatcham Consortium	<p>The Consortium considers that dividing the District into different geographical areas is an appropriate approach, provided that the strategy for each area is informed by an overarching strategy for the District as a whole.</p> <p>West Berkshire includes areas which are subject to different considerations. For example, the key urban areas of Newbury and Thatcham are geographically close and functionally related to one another. In contrast, the Eastern Urban Area shares a functional relationship with Reading. The North Wessex Downs Area of Outstanding Natural Beauty covers approximately 74% of West Berkshire and the restrictive approach to such areas in national planning policy requires a different strategy to that in other areas and moreover, this large part of the District does not include any of the most sustainable settlements (the most sustainable being Hungerford which is currently identified a Rural Service Centre). The East Kennet Valley lies outside of the AONB, and includes a number of settlements but none identified as being within the upper tiers of the settlement hierarchy.</p> <p>The highly contrasting characteristics of each part of West Berkshire suggest that a bespoke planning strategy be employed in each area.</p> <p>The Local Plan Review should ensure that policies for each geographic area are complementary and enable easy monitoring of delivery. Overlapping policies which ascribe or sub-divide requirements across areas should be avoided to ensure that there is a transparent rationale behind need and supply.</p>

Respondent	Response
West Waddy ADP for Gerald Palmer Eling Trust	As the different parts of West Berkshire have different characteristics it is agreed that dividing the District into different geographical areas is still the most appropriate way to deliver the spatial strategy.
Woolf Bond Planning for JJP Land	We do not object to this approach but note that any potential growth at Grazeley (paragraph 5.8 of Scoping Report) should not restrict growth of other sites within the Eastern Kennet Valley spatial area. If this occurred, it would undermine the approach of the draft NPPF to supporting growth in villages.
Woolf Bond Planning for Donnington New Homes	We do not object to this approach but do note the specific need to identify land in rural areas and on smaller sized sites, particularly where land is under-utilised in the revised NPPF.
Woolf Bond Planning for Donnington New Homes	We do not object to this approach but do note the specific need to identify land in rural areas and on smaller sized sites, particularly where land is under-utilised as stated in the revised NPPF.

## Summary of responses

The majority of respondents, including parish councils and statutory consultees, stated that they felt dividing the district into geographical areas is still an appropriate mechanism to deliver the spatial strategy. They outlined that this approach is an effective way to meet housing need and it also takes into account the distinctive features and characteristics of the district, which allows policies to be focused and relevant rather than taking a broad brush approach. One parish council disagreed with this approach however, and responded stating that a more district wide approach should be adopted, but that the different characteristics of the district should be recognised among other equally important factors. One statutory consultee highlighted the need to carry out the sequential test for fluvial flood risk when considering the location of development.

Some of the development industry considered the geographical areas were appropriate as a broad objective but that it would need to be balanced against an amended settlement hierarchy. Some respondents took this further and felt that a more sophisticated method of assessing sustainability should be applied, and highlighted the settlement hierarchy itself as a more appropriate way to deliver the spatial strategy. The relationship between the spatial areas and the settlement hierarchy was strongly emphasised, with many highlighting the important role the settlement hierarchy plays in identifying sustainable locations for development.

It was felt by some in the development industry that geographical areas would ensure that the supply of housing land in the district would not be over reliant on a small number of large scale strategic sites but allowed for an even spread of sites across the district. There was support from a landowner for retaining Newbury and Thatcham as a distinct area, and others stated that overlapping policies which sub-divide requirements across areas should be avoided to ensure transparency. A couple of respondents from the development industry felt the Council needed more evidence before it could make any decisions.

One landowner stated that dividing the district into geographical areas imposed arbitrary boundaries and distributing the housing requirement accordingly sits uncomfortably with the more strategic approach to planning which is emerging. It was outlined that geographical areas has the potential to lead to parochial decisions and compromise opportunities for sustainable patterns of growth. One of the responses from the development industry felt the Council had a tendency to apply these

artificial boundaries too rigidly in plan making and decision-taking and that flexibility was required, especially with regard to allocating housing figures for each spatial area.

Potential growth at Grazeley raised concern among some respondents who felt that such growth should not restrict the growth of other sites within that spatial area. Specific concern was also raised by landowners as to how a new settlement would fit into the mechanism of dividing the district into geographical areas. The specific need to identify land in rural areas and on smaller sized sites, as set out within the draft NPPF was set out in the responses of some site promoters. The relationship that some settlements on the edge on the District have with settlements in adjoining authorities was also raised.

### **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR).

The overwhelming support given to the effectiveness of dividing the District into geographical areas is welcomed but, in this context, the capacity of the Eastern Urban Area to accommodate future growth is an issue which requires further consideration. The Council will therefore review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries.

A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q5: Do you think there is a realistic opportunity for a large scale development to the south of Reading which could have the potential to be incorporated into the overall spatial strategy for the District? Please give reasons for your answer.**

Number of responses received: 49

Respondent	Response
<b>Internal</b>	
Archaeology Team West Berkshire Council	Yes assuming sustainable development is proposed in terms of the historic environment of the area – we have yet to see any assessments.
Minerals and Waste Team West Berkshire Council	<p>Although it is acknowledged that here are no detailed plans for proposed development in this location, there are a number of operational minerals and waste sites with permanent and temporary planning permissions that are likely to be in close proximity to any large scale development in this area. The effect of any new residential development on the operation of these sites, should be considered in any future proposals.</p> <p>In general terms where any part of a site is underlain by aggregate mineral deposits then consideration of policies 1 and 2 of the Replacement Minerals Local Plan for Berkshire (Saved Policies) would be required. There are also areas in the vicinity of Grazeley which have been proposed as a Mineral Safeguarding Area in the emerging Minerals and Waste Local Plan (Preferred Options). There should be consideration given to the potential for sterilisation of mineral resources as a result of relevant future proposals.</p>
Public Transport Team West Berkshire Council	<p>Providing that all necessary supporting infrastructure and services are provided or upgraded in advance and that suitable mitigation is implemented to address the identified constraints, then I consider that there is a realistic opportunity to deliver a large-scale development to the south of the M4, south of Reading. This could potentially be delivered in partnership with Wokingham Borough Council, building on the joint activity that culminated in the production of the Spatial Planning Framework. Notwithstanding the constraints in the area, such as the proximity of the AWE Burghfield site, topography and drainage issues, there is substantial land available and limited potential to utilise capacity currently available on nearby radial routes into Reading (A33 and MereOak Park &amp; Ride, and via the Reading-Basingstoke rail line).</p> <p>In terms of transport infrastructure and services, given the outlying location of this proposed development in the vicinity of Grazeley and the lack of direct rail or road links from there to Newbury, as West Berkshire's administrative centre, and Thatcham, consideration should be given to:</p>

Respondent	Response
	<p>1. Construction or upgrading of road/s from the development linking through to the A4;</p> <p>2. Establishing and sustaining of peak and off-peak, high-quality, high-frequency public transport routes linking the development directly with:</p> <ul style="list-style-type: none"> <li>• established employment sites in West Berkshire including Calleva Park, AWE Aldermaston and Easter Park, and allowing for onward rapid travel to Thatcham and Newbury;</li> <li>• schools and amenities in Mortimer (the nearest Rural Service Centre in the District);</li> <li>• employment opportunities and amenities in the Reading area, including Reading International Business Park.</li> </ul> <p>This could potentially be achieved by complementing the existing 'greenwave' and the commercially-operated 'lime' branded high-quality bus routes.</p> <p>3. Scope to construct a new rail station at Grazeley, having regard to train pathing constraints and other developments planned for the Reading-Basingstoke line, including the pending construction of Reading Green Park Station. If an additional Grazeley Station is not deemed feasible, then upgrading of the station at Mortimer, coupled with connecting bus services to Mortimer and/or Reading Green Park Stations may be warranted.</p>
<b>Statutory consultees</b>	
Reading Borough Council	<p>Yes. Although, consideration should be given to the deposits of sharp and gravel that lie south of Reading, also the mineral extraction and processing site Bridge Farm. Where the need for development outweighs the benefits of protecting the mineral resource, there may be opportunities to accommodate both through the use of prior extraction. Prior extraction refers to the removal of a mineral before any development takes place on a site in order to avoid the loss of valuable mineral deposits, which once built over would not be accessible. The opportunity for prior extraction of the full resource may not always be available because of various factors, including the delivery program of development or the availability of the resource. However, in order to assist with the national policies for ensuring a steady and adequate supply of, it is important to make every effort to minimise the sterilisation of mineral resources. Furthermore, if development were to be proposed in close proximity to Bridge Farm, then appropriate buffers and mitigation measures should be incorporated into design proposals in order to make any nearby development compatible so that the site could continue its intended use. Early consultation on non-minerals and waste development proposals will allow for consideration of safeguarding of mineral resources and infrastructure and how this can be built into the scheme and not necessarily considered a barrier.</p>
Stratfield Mortimer Parish Council	<p>There clearly is scope for such an opportunity. However, our concern is that such a development would not be a true Garden Village but a mere extension of Reading across the motorway. Because, in our view, most of the new residents would see the development in that light, and would have existing connections that demanded access back to Reading, it would not be self-sustaining but cause all sorts of issues outside the boundary of the settlement. A ready example is the congestion at junction 11 of the M4 and along the A33 into Reading at present. To add 15,000 people just on the other side of the M4 would, in our view, lead to very much increased congestion. Similarly while GP facilities might be provided within the development, what would be the impact of the additional population on services at Royal Berkshire Hospital? Is</p>

Respondent	Response
	<p>it not the case that the infrastructure package for the settlement would largely be spent within the development itself (or on the immediate periphery) rather than on the wider network?</p> <p>While giving examples of issues with access to Reading it is also clear that traffic will be increased on the other roads around the area, including those through Mortimer. Another aspect of any development, but one that is thrown into sharp relief by the size of the proposed development is the timing of any infrastructure provision. For instance the provision of extra GPs in the area must happen at the same time as the increase in population if existing facilities are not to be overwhelmed</p>
Thatcham Town Council	Yes- due to the national need for housing this has great potential and importance in the overall spatial strategy.
Streatley Parish Council	<p>Streatley Parish Council agrees that a large scale development south of Reading makes a lot of sense for a number of reasons, including:</p> <ul style="list-style-type: none"> <li>a. It is close to existing major urban settlements and existing infrastructure and employment areas.</li> <li>b. It is strategically placed to support housing needs of 3 neighbouring Districts (West Berks, Wokingham and Reading).</li> <li>c. It will reduce the need to accommodate and provide numerous other sites scattered across the rest of the District.</li> <li>d. It is not in a sensitive "Green Belt" or AONB.</li> </ul>
Pangbourne Parish Council	<p>Yes I do. This development could deliver 15,000 new homes with supporting infrastructure and services, most of which would fall within the boundaries of WBC and Wokingham. The benefit to WBC would be at least 5,000 new houses. There may also be some further potential for development around Burghfield. This is clearly a long term vision and will involve massive investment in transport infrastructure which will eventually revolutionise access from the south into Reading. To enhance economic expansion we are dependent on infrastructure development outside our control, specifically Crossrail and the new runway at Heathrow both of which are important to Pangbourne. I also think that the difficulties we (and others) have faced in finding sites for housing it makes far more sense to develop and new town south of Reading with all the necessary services and infrastructure rather than expanding current village envelopes into AONB.</p>
Greenham Parish Council	<p>There has been overwhelming emphasis on housing in the Newbury &amp; Thatcham urban area in the 2026 Local Plan. We believe much of this merely accommodates commuters into Reading and therefore a new large housing development nearer to Reading at Grazeley ought to be pursued if at all possible as being more sustainable.</p>
Holybrook Parish Council	<p>Due to the lack of infrastructure in the urban areas, to the south of Reading, Holybrook Parish Council do not agree that there is a realistic opportunity for a large scale development.</p>
Burghfield Parish Council	<p>No. It would not be possible to build 5,000 new homes in the eastern fringe of West Berkshire without sacrificing an extensive area of attractive countryside, some of it in close proximity to AWE Burghfield and to the Thames Basin Heaths SPA.</p>

Respondent	Response
Burghfield NDP Steering Group	No. It would not be possible to build 5,000 new homes in the eastern fringe of West Berkshire without sacrificing an extensive area of attractive countryside, some of it in close proximity to AWE Burghfield and to the Thames Basin Heaths SPA.
Sport England	Yes, because the infrastructure which already exists within Reading
Environment Agency	<p>We don't know the exact location of the proposed large scale development south of Reading. However we have the following advice.</p> <p>Firstly we advise you to apply the flood risk sequential test when considering the location of any development. You will need to apply the sequential test as part of your evidence base for your local plan. You will need to be able to justify your choices for the location of development.</p> <p>If this scheme passes the sequential test and is compatible with the flood zone it lies in accordance with the flood risk tables 1, 2 and 3 in the Planning Practice Guidance then you will need to come to us for advice on other issues within our remit. Depending on where the development is located this can include, biodiversity and watercourses, groundwater quality and contaminated land, surface water quality and pollution prevention and fluvial flood risk.</p>
Savills for Thames Water	We believe it is something that's been considered for quite a few years. Thames Water has no objections to the plans and would welcome the opportunity to work with the Local Authority and developers on scale and phasing to ensure that any necessary infrastructure is delivered ahead of occupation.
<b>General consultation bodies</b>	
Mid & West Berks Local Access Forum	<p>We do not feel that it is within our remit to comment on where development should take place but, if this land area is developed, we recommend that:</p> <ul style="list-style-type: none"> <li>i. Greenways / off-road paths are designed into the plans at an early stage to encourage non-motorised travel within the development and to other destination points. The example currently being implemented in Wokingham Borough may be useful to follow &amp; develop further.</li> <li>ii. Public Open Space (protected in perpetuity) is incorporated within walking distance of housing developments and reached by attractive, safe &amp; convenient off-road paths to encourage non-motorised travel. Existing use of land for current recreational activities needs to be retained or replaced with equivalent.</li> <li>iii. Off-road connections to the existing <u>public rights of way network</u> are designed into developments for all user groups to encourage Active Travel for both utility &amp; recreational purposes. New paths should be added to the Definitive Map and Statement at the correct status to ensure security and aid communication to the public.</li> </ul>
British Horse Society	It is not the Society's remit to comment on where development might take place but regard should be had to the existing equestrian establishments in the area and provision made for their retention. It should be noted that many horse riders

Respondent	Response
	live in urban areas and travel to where there horse is kept / or where they ride. The network of bridleways (which cater for most user groups) built into Milton Keynes are an example of development incorporating off-road paths for all to encourage non-motorised travel.
Reading Gospel Hall Trust	Development would be better elsewhere because of AWE and pre-existing traffic congestion.
<b>Other stakeholders</b>	
Robert Wallace	Reading will continue to grow in all directions - the critical issue by 2040 will be keeping it from linking up with Newbury and Pangbourne in a semi-continuous sprawl.
William Graham	It depends on the size of development being considered. Apart from the M4 and the M3 there are no major roads serving this area going East-West. Therefore the M4 between Junctions 12 and 10 in particular would become even more congested with local commuter traffic at rush hours. It should be protected as the main National East-West route. The M4 forms a barrier to southwards expansion at present. This should be resisted by developing all possible land in the Reading area north of the M4. Any large scale development should be considered as a stand-alone new “town” separated from Reading with its own infrastructure.
Neil Richardson	Major area of uncertainty that needs resolving soonest.
Christopher Gent	The large scale development proposed south of Reading, commonly referred to as Grazeley is a very good way of meeting the housing requirements across West Berkshire, Reading and Wokingham as it enables a coherent development as a single community with appropriate infrastructure such as schools, doctors surgeries, retail and leisure amenities. Such an approach is preferable to piecemeal development which adds additional strain on existing facilities as smaller scale does not normally come with increased infrastructure capacity.
<b>Landowners, site promoters and developers</b>	
Bewley Homes	However, whilst we agree in principle with this approach, it would have to be ensured that it was brought forward in combination with smaller sites to ensure a robust 5 year housing land supply is maintained. The delivery of infrastructure in terms of transport improvements and facilities would be fundamental for the project to be successful. Environmental constraints as well as the impact of AWE Burghfield would also need to be overcome.
Barton Willmore for Graham Child	Our client does not consider the need to comment on the sustainability of large scale development to the south of Reading as it is not considered relevant to the purpose of their representations. Moreover our client has not been provided with sufficient evidence with which to justify a meaningful response.

Respondent	Response
	<p>Notwithstanding this our client would note the deliverability of large sites previously with West Berkshire, which have been in some instances significantly delayed. Our client considers that it highlights the issues that can arise with large strategic sites and a cautious approach should therefore be taken in relation to their forecasted timeframes for delivery. As a consequence the Council have had to rely previously on windfall sites to deliver their housing requirement and indeed their 5 year delivery figures have been affected as a result.</p> <p>Whilst our client does not suggest that this should indicate that all strategic sites will encounter such delays, a broad recognition that larger strategic sites will deliver housing later in the plan period should be balanced by the allocation of smaller scale sites which have the ability to deliver earlier in the plan period. This will ensure that housing needs are met effectively with a steady delivery of homes and will also ensure that the council maintain a 5 year housing supply. Solely relying on large strategic sites is not considered conducive to a stable supply of housing. In this regard our client would highlight their land at Pangbourne Hill, which is able to deliver housing in the short/medium term and should therefore be considered for allocation within the emerging Local Plan.</p>
Barton Willmore for Sulham Estate	<p>We do not wish to comment specifically on a large-scale development to the south of Reading as it is not directly relevant to our client's representations. In addition, this consultation lacks any detailed information in relation to this which could provide the basis for a response.</p> <p>Nevertheless, we would like to comment that, in order for the Council to meet housing needs, we would support the allocation of a range of different site sizes across the District which are sustainably located and well-related to the 'Urban Areas' as identified within the Spatial Strategy.</p> <p>We would also like to comment that if the Council chooses to pursue large scale or strategic allocations, a cautious approach should be taken in terms of the forecasted timeframe for the delivery of houses.</p> <p>The recognition that larger strategic sites will deliver housing later in the plan period should be balanced by the allocation of small to medium scale sites which have the ability to deliver earlier in the plan period. This will ensure that housing needs are met effectively with a steady delivery of homes and will also ensure that the council maintain a 5 year housing supply.</p> <p>Our client's site, Land at Hall Place Farm Tilehurst, offers the opportunity to allocate a non-strategic scale site with the ability to deliver up to 80 homes in the short to medium term. The site is deliverable with all land within the ownership of our client.</p>
Boyer Planning for Spitfire Bespoke Homes Ltd	<p>Spitfire do not object to the principle of a new settlement at Grazeley, although it is essential that this is not at the expense of allowing early sustainable residential growth in villages in line with the draft NPPF.</p> <p>In addition to the importance of rural housing as outlined in Paragraph 80 of the draft NPPF (see above), it is noted that the draft NPPF (paragraph 69) recognises that "small sites can make an important contribution to meeting the housing requirements of an area, and are often built-out relatively quickly. To promote the development of a good mix of sites local planning authorities should:</p>

Respondent	Response
	<p>a) Ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less..."</p> <p>For this reason, it is essential that the Local Plan Review allocates smaller sites which are capable of meeting a local housing need early in the Plan period.</p>
Mark Carter for Mr R.L.A. Jones	<p>The respondent does not think there is a realistic opportunity for a large scale development to the south of Reading with the potential to be incorporated into the overall spatial strategy for the District. 15,00 dwellings of which 5,000 would be in West Berkshre would be too dependant on Wokingham District and too many for West Berkshire to absorb.</p> <p>This is an idea which has existed for thirty years and has never progressed on any scale.</p> <p>The site is the wrong side of the M4 which heavily constrains traffic and is socially divisive, it has a number of sensitive environmental factors and is too close to the Atomic Weapons Establishment at Burghfield.</p> <p>Lastly a concentration of future development at the eastern end of the District would not serve West Berkshire. It would take overspill from Reading and Wokingham. It would not enable the steady growth of communities in West Berkshire which has occurred to date and which help to preserve important local facilities and services in West Berkshire communities such as Lambourn.</p>
The Chilton Estate	<p>Large new settlements of this nature can present practical and timing problems. The allocation of Sandford Farm, Newbury, as a strategic allocation in the Core Strategy has not proved successful. It has so far not come forward for development after many years and if it does it's likely to be under the control of a few larger developers which could have a restrictive impact on pricing and design.</p> <p>Accordingly land allocation should be concentrated on relatively small sites in areas such as Hungerford and Thatcham plus controlled growth within villages.</p>
Fisher German LLP for Mr Musgrave and Begley	<p>The allocation of the Garden Village new settlement is opposed and is of significant concern, both in terms of its physical impact, and its impact of the soundness of the development strategy and supply of housing.</p> <p>The site is alleged to have the opportunity to provide employment land and approximately 15,000 new homes, with 5,000 delivered in West Berkshire. Such a development will require large scale environmental and economic infrastructure, including a rail station, new roads, schools, flood alleviation and strategic scale green infrastructure. The site is being considered without detailed evidence that the site can be delivered in terms of environmental constraints, highways and utilities infrastructure. Until this work is completed, the new settlement should form no part of the proposed development strategy.</p> <p>The Council are already aware that the site has a number of strategic constraints and issues, not least that the land is within multiple ownerships and therefore land assembly would be required in order to deliver a single coherent scheme. In addition, large areas of the site are prone to flooding and it is unknown if alleviation of this to the level required in order to deliver a new settlement would be possible, and the site is close to an Atomic Weapons Establishment (AWE) where areas are safeguarded from increases in population in close proximity to the establishment.</p> <p>Funding has been directly sought from the Government in an Expression of Interest (EoI) in order to deliver the project. This includes £5.38m of capacity funding to pay for technical studies and a team of specialist staff to deliver the project. In</p>

Respondent	Response
	<p>addition, the Western Berkshire Council's have also requested £250m of forward funding from the Government in order to deliver the infrastructure required for the new settlement.</p> <p>In terms of the capacity funding, the EoI sets out that in the year 2016/17 it would require £325,000, with £1.764m in 2017/18, and approximately £800,000 in each of the next four years.</p> <p>In terms of the forward funding, the EoI sets out that the £250m will be required between 2018/19 and 2026/27.</p> <p>No decision has been made on the application as yet and as such the Council is behind in its delivery of their strategy as set out in the EoI. This strategy includes a housing and infrastructure trajectory which anticipates delivery of dwellings by 2020/21, with 6,700 dwellings projected to be delivered by the end of the Plan period in 2035/36. There is no break down as to which LPA areas these would be delivered within, however it is clear that the 15,000 overall units would not be delivered within the Plan period. In addition, there is no reasonable prospect that any delivery of units would be delivered by 2020/21.</p> <p>Having regard to the previous experience in delivering new settlements, the necessary infrastructure required for the development, including a new railway station, new access roads and schools, it is considered that the lead-in time for any such development and delivery of units would go beyond the Plan period. To assume that a new settlement will deliver any units within the Plan period will result in a Plan which is unable to meet the District's housing needs. As such it is considered that whilst planning for the new settlement can continue, in order to ensure the Plan is sound and that the OAN will be met it is considered that the existing settlements should be apportioned sustainable levels of growth.</p>
Gladman Developments	<p>It is essential that West Berkshire Council works pro-actively alongside relevant local authorities nearby to establish an appropriate strategy for the growth of the wider area. In particular, the continued growth of Reading will be vitally important in this context. Reading is already at a point where it is unable to meet its development needs within its administrative boundaries and it has a social and economic that extends into neighbouring areas. It is therefore essential that options to support the continued sustainable growth of Reading are robustly considered through the local plans of all of its neighbouring authorities. Such an approach will require opportunities for Reading's needs to be met within adjoining areas (including those that have not been defined within the Western Berkshire HMA such as South Oxfordshire). Any such approach should not however detract from the need for the Local Plan to support the sustainable growth of the main urban and rural settlements of West Berkshire.</p>
Hallam Land Management	<p>Over the course of a number of years HLM and WEL have commissioned a comprehensive review across all disciplines, the results of which are available to West Berkshire, and demonstrate that both technically and in terms of sound, sustainable planning there is a genuine and realistic opportunity to deliver a new settlement south of Reading. These conclusions are supported by:</p> <ul style="list-style-type: none"> <li>• The West of Berkshire Spatial Planning Framework December 2016</li> <li>• The Grazeley Garden Settlement Joint Expression of Interest submitted to Government July 2016. The Wokingham/West Berks/Reading Joint Housing Infrastructure Fund expression of interest submitted to Government September 2017 – now shortlisted.</li> </ul>

Respondent	Response
Nexus Planning for Pangbourne Beaver Properties	<p>The Council suggests that land to the south of Grazeley, south of Reading is being considered as a potential housing and mixed use development comprising approximately 15,000 homes. This development would straddle the local authority boundary and would comprise approximately 10,000 homes in Wokingham and 5,000 in West Berkshire.</p> <p>PBP Ltd does not object, as a matter of principle, to the allocation of what amounts to a new settlement to the south of Reading as a way of helping to meet future development needs in West Berkshire. But this new settlement should not detract from housing provision that will help to sustain existing settlements. It is also noted that housing delivery rates for new developments of this scale tend to be low, particularly in the early years due to the infrastructure requirements associated with this form of development. Implementation will be further complicated for a settlement that lies within two local authority areas.</p>
Nexus Planning for Croudace	<p>The Council suggests that land to the south of Grazeley, south of Reading is being considered as a potential housing and mixed use development comprised of approximately 10,000 homes in Wokingham and 5,000 in West Berkshire.</p> <p>Croudace Homes does not object, as a matter of principle, to the allocation of what amounts to a new settlement to the south of Reading as a way of helping to meet development needs in the District. However, this stance is predicated upon the Council, prior to making such an allocation, and prior to determining the scale of any such new allocation, ensuring that it has first maximised all sustainable options to deliver housing at the existing three strategic settlements and particularly at Thatcham.</p> <p>Whilst new settlements can of course deliver a range of benefits, urban extensions to existing settlements are generally preferable as they have much greater potential to ensure that the benefits, in terms of new infrastructure provision, accrue to both existing residents as well as new residents. New settlements, by their very nature, are self-contained and, therefore, generally provide infrastructure benefits to new residents only.</p> <p>We would also raise concerns regarding the potential delivery rates from a development of this scale. The emerging Local Plan is due for adoption at the end of 2020 but the Grazeley site crosses local authority boundaries would therefore require extensive cross boundary joint working. It is also likely that an Area Action Plan would be needed for development of this scale. Assuming this site is allocated, it would likely be followed by several outline planning applications with appropriate legal agreements which would be significant and complex for a development of this scale and nature.</p> <p>Further to this, conditions would need to be discharged and reserved matters submissions produced, submitted and determined. All of this would be required before enabling works on site can commence, let alone the construction and completion of houses. Given this lengthy lead in time, it is reasonable to assume that there would be no material start on site until the back end of the current Plan period at best, and possibility into the next Plan. In any event, the scope for delays aside, it would be mistake to rely too heavily on delivery of housing from a single site because it is highly questionable whether the market would be sufficiently strong to support the purchase of this many homes per annum, over a lengthy period of time, in a single location.</p> <p>To ensure a mixed portfolio of sites which will ensure delivery at the front end of the Plan period and throughout, as well as minimising risk associated with a new settlement, it is essential that the Council first ensures that all development opportunities at the three existing strategic settlements are maximised before determining the need for, and scale of, any</p>

Respondent	Response
	<p>new settlement proposal.</p> <p>In that regard, it has been demonstrated that the land at Henwick Park, Thatcham is suitable for development comprising at least 225 dwellings. Development at this site would make a meaningful contribution during the first five years of the Plan period.</p>
Origin3 Ltd for Sandtrend Ltd	<p>The West Berkshire Spatial Framework Plan provides the most suitable starting point in identifying suitable directions for new growth.</p> <p>Through working with the adjoining authorities of Reading Borough, Wokingham and Bracknell Forest, West Berkshire have identified broad site opportunities which span administrative boundaries and offer appropriate locations to direct new development.</p> <p>These locations are identified as Areas of Search in the Spatial Framework Plan. We support the Council's intentions to further explore development opportunities within these Areas of Search through the LPR.</p> <p>We understand from the Spatial Framework Plan 1, see attached document at Appendix 2, that the key Areas of Search within West Berkshire are at:</p> <ul style="list-style-type: none"> <li>• Land north of Newbury within the 'M4 Corridor'; and</li> <li>• At Grazeley, to the south of Reading</li> </ul> <p>This LPR provides an excellent opportunity for the Council to further test and explore the development prospects identified by the West of Berkshire Spatial Framework Plan. These broad areas have been identified by West Berkshire and the adjoining authorities as suitable locations for future growth, subject to detailed environmental assessment.</p> <p>It appears that through the LPR Scoping Report opportunities for a new settlement at Grazeley are being explored at length which, in principle, is supported providing a mix of other sites are also brought forward through the LPR. In order to balance supply and ensure that all reasonable alternatives are assessed, the Council should also explore development opportunities north of Newbury.</p> <p>The NPPF paragraph 182 stipulates that in order to be justified in the context of soundness, the plan should set out the most appropriate strategy, when considered against all reasonable alternatives.</p> <p>Development pressure to the north of Newbury is high due to excellent employment opportunities, excellent access and high quality housing and education. Through directing development to the north of the town, within the 'M4 corridor' new homes would be very well connected to both the immediate town of Newbury but also to Reading and the wider southeast region.</p> <p>Good connectivity to Reading has much wider benefits as it has been accepted by Reading Borough Council that it will struggle to meet its OAHN within its own administrative boundary.</p>
Pegasus Planning Group for Donnington New Homes	<p>No – there is not a realistic opportunity for incorporating a large-scale development to the south of Reading into the overall spatial strategy for the district. Any major development which is not delivered on land adjacent to an existing settlement would be a complete departure from the overall spatial strategy. This is because the current spatial strategy builds on the existing settlement pattern and suggests that land should only be allocated for housing development when it is adjacent to an existing settlement, as defined in Core Strategy Policy ADPP1, which states that:</p>

Respondent	Response
	<p>“Development in West Berkshire will follow the existing settlement pattern and comply with the spatial strategy set out in the Area Delivery Plan policies of this document based on the four spatial areas.”</p> <p>“Most development will be within or adjacent to the settlements included in the settlement hierarchy set out below”</p> <p>“West Berkshire’s main urban areas will be the focus for most development.”</p> <p>Policy ADPP1 also states that only appropriate, limited development, which focuses on addressing identified needs and maintaining a strong rural economy, will be allowed in the open countryside.</p> <p>If a large-scale development to the south of Reading is incorporated into the overall spatial strategy for the district, it should not be relied upon to contribute towards West Berkshire Council’s five-year housing land supply, as work on the strategic site is currently at very early stages, and will take decades to come forward given its complexities. These complexities include the site’s location within the boundaries of three Local Planning Authorities, its potential size of approximately 15,000 dwellings, and the complete lack of infrastructure at the site currently.</p>
Pegasus Planning Group for Donnington New Homes	<p>No – there is not a realistic opportunity for incorporating a large-scale development to the south of Reading into the overall spatial strategy for the district. Any major development which is not delivered on land adjacent to an existing settlement would be a complete departure from the overall spatial strategy. This is because the current spatial strategy builds on the existing settlement pattern and suggests that land should only be allocated for housing development when it is adjacent to an existing settlement, as defined in Core Strategy Policy ADPP1, which states that:</p> <p>“Development in West Berkshire will follow the existing settlement pattern and comply with the spatial strategy set out in the Area Delivery Plan policies of this document based on the four spatial areas.”</p> <p>“Most development will be within or adjacent to the settlements included in the settlement hierarchy set out below”</p> <p>“West Berkshire’s main urban areas will be the focus for most development.”</p> <p>Policy ADPP1 also states that only appropriate, limited development, which focuses on addressing identified needs and maintaining a strong rural economy, will be allowed in the open countryside.</p> <p>If a large-scale development to the south of Reading is incorporated into the overall spatial strategy for the district, it should not be relied upon to contribute towards West Berkshire Council’s housing land supply over the period to 2036, as work on the strategic site is currently at very early stages, and will take decades to come forward given its complexities. These complexities include the site’s location within the boundaries of three Local Planning Authorities, its potential size of approximately 15,000 dwellings, and the complete lack of infrastructure at the site currently.</p> <p>It is reasonable to consider that a new settlement such as this could contribute to housing supply, post 2036.</p>
Pro Vision for Rootes Trustees	<p>Large scale development south of Junction 11 of the M4 would significantly distort the existing spatial strategy and undermine the sustainable development objectives of supporting and enhancing the viability and vitality of existing settlements and promoting sustainable economic growth. The main focus of growth should continue to be in the Urban Areas, with further growth directed to the existing Rural Service Centres, including Hungerford, and Service Villages. The SHLAA demonstrates that there is capacity to accommodate the likely level of need for additional housing and employment land within, or as extensions to, the existing settlements.</p>

Respondent	Response
	<p>Not only would a new settlement located at the eastern extremity of the District undermine the viability and vitality of the existing settlement hierarchy, but it is likely to increase travel demands and undermine the objective of making as much use as possible of previously developed land. It will also raise issues about housing delivery, particularly in the light of the emerging Housing Delivery Test that will quickly penalise LPA's that rely heavily on large strategic sites that by their very nature are slow in delivering housing and very susceptible to delay due to their significant infrastructure requirements.</p>
Pro Vision for Cala Group and Wates Developments	<p>Large scale development south of Junction 11 of the M4 would significantly distort the existing spatial strategy and undermine the sustainable development objectives of supporting and enhancing the viability and vitality of existing settlements and promoting sustainable economic growth. The main focus of growth should continue to be in the Urban Areas, with further growth directed to the existing Rural Service Centres, including Hungerford, and Service Villages. The SHLAA demonstrates that there is capacity to accommodate the likely level of need for additional housing and employment land within, or as extensions to, the existing settlements.</p> <p>Not only would a new settlement located at the eastern extremity of the District undermine the viability and vitality of the existing settlement hierarchy, but it is likely to increase travel demands and undermine the objective of making as much use as possible of previously developed land. It will also raise issues about housing delivery, particularly in the light of the emerging Housing Delivery Test that will quickly penalise LPA's that rely heavily on large strategic sites that by their very nature are slow in delivering housing and very susceptible to delay due to their significant infrastructure requirements.</p>
Pro Vision for Rivar	<p>Large scale development south of Junction 11 of the M4 would significantly distort the existing spatial strategy and undermine the sustainable development objectives of supporting and enhancing the viability and vitality of existing settlements and promoting sustainable economic growth. The main focus of growth should continue to be at Newbury and Thatcham, with more modest growth directed to the existing Rural Service Centres and Service Villages. The SHLAA demonstrates that there is capacity to accommodate the likely level of need for additional housing and employment land within, or as extensions to, the existing settlements.</p> <p>Not only would a new settlement located at the eastern extremity of the District undermine the viability and vitality of the existing settlement hierarchy, but it is likely to increase travel demands and undermine the objective of making as much use as possible of previously developed land. It will also raise issues about housing delivery.</p>
RPS for AWE	<p>AWE Burghfield currently provides capability for assembly and disassembly of warheads together with limited component manufacture and storage. It is the only site in the UK that provides this function. Future capabilities will continue to include assembly and disassembly of warheads for the foreseeable future but also a potential increase in the component manufacture. This is evidenced by the modernisation and redevelopment programme that has been pursued over the last 10 years. In addition, provision will need to be made for AWE B to provide capabilities, if required, for storage of materials.</p> <p>Any major housing development in the vicinity of AWE Burghfield will need to be compliant with the requirements of the emergency planning area (also known as the Detailed Emergency Planning Zone) which is currently under review,</p>

Respondent	Response
	<p>together with the associated Emergency Plan. Local planning polices are already in place which seek to prevent inappropriate development, such as housing, within the EPA on the grounds of public safety.</p> <p>Future capabilities may also require consideration of the application of the Control of Major Accident Hazards regulations which could be affected by the presence of major development close to AWE Burghfield.</p> <p>In summary careful consideration needs to be given to the location of any major development close to AWE Burghfield and in particular within the EPA to ensure that there is no potential impact upon current and / or future site operations.</p>
Savills for Englefield Estate	<p>The Englefield Estate are one of the key landowners affected by the potential new settlement at Grazeley. Should the relevant Councils (Wokingham Borough and West Berkshire) consider that this is the most appropriate location for new growth to meet the needs of the West Berkshire Housing Market Area, the land is available for development. The Estate considers the land to be suitable, being relatively unconstrained in planning policy terms and well located to existing or proposed infrastructure improvements.</p>
Joy Schlaudraff	<p>I think this is somewhat unrealistic. The development of that many houses has potential in the area, but needs to be dispersed throughout the south of Reading and in other areas, in small groups of around 25-50, through the exceptions policy spoken of in Question 3 and 4 above.</p> <p>More flexibility in identifying suitable land for housing is needed, and it needs to be easier for people to find out if their land has development potential or not, and where.</p>
Turley for Commercial Estates Group	<p>The Local Plan Review is right to consider the possibility of delivering a new settlement at Grazeley. However, the development of what amounts to a new settlement at this location cannot be guaranteed and will invariably take a very long time to deliver. We draw the Council's attention to the experience of Swindon Borough Council, which has attempted to deliver a comparable allocation 'New Eastern Villages' (comprising 8,000 dwellings), but which has been plagued by difficulties that have impeded development. Not coincidentally, the land supply position in Swindon is presently less than 3 years and therefore falls significantly short of the requisite 5 years.</p> <p>Similarly, should Grazeley come forward, it is likely to contribute towards meeting Reading's and Wokingham's unmet need, rather than West Berkshire's. This is by virtue of the Grazeley site being situated adjacent to the Reading / Wokingham conurbation, and being dislocated from Newbury and other major settlements in West Berkshire. Accordingly, whilst we certainly consider that large allocations should play a key role in the spatial strategy, we strongly advise against an over-reliance on the 'Grazeley Solution'.</p>
Turley for Berfeld Limited	<p>Yes. We consider that there should be explicit recognition in the policy of the West of Berkshire Spatial Planning Framework. This is a joint agreement between the authorities of Bracknell Forest Council, Reading Borough Council, West Berkshire District Council and Wokingham Borough Council.</p> <p>This identifies that "up to 2036 the area needs to deliver in the region of 65,665 new dwellings to deal with population growth, affordability, market factors, sustaining and improving economic growth and the impact of the growth of London. This means finding land for just under 3,000 homes per year."</p>

Respondent	Response
	The Spatial Planning Framework has resulted in Reading Borough Council making a formal request to Wokingham Borough Council and West Berkshire Council in a 'Statement of Collaboration' to assist in their shortfall in unmet need for housing.
Turley for North East Thatcham Consortium	<p>The Consortium considers that any proposals for large scale development in the area to the south of Reading will need to be informed by the characteristics in that area, particularly the presence of areas at risk of flooding and the proximity of the area to the AWE facility at Burghfield which may represent a constraint on development in response to public safety considerations.</p> <p>In any event, the Consortium considers that large scale development to the south of Reading would serve to meet the needs of other authorities, namely Reading and Wokingham Boroughs. The area south of Reading has little, if any, functional relationship with the remainder of West Berkshire given the distance between this area and West Berkshire's main urban areas and principal settlements.</p> <p>Furthermore, the Consortium considers that any infrastructure and facilities provided as part of large scale development to the south of Reading would not provide any opportunities to help address the long established aspirations elsewhere in West Berkshire. For example development south of Reading would not assist in regenerating Thatcham, making it a more self-contained settlement or the pressing need for infrastructure delivery at the town.</p> <p>The Consortium considers that the Council should first and foremost seek opportunities within the District which will make a positive contribution to achieving sustainable development in West Berkshire. That is likely to be significantly more achievable at the settlements within the District rather than in a part of West Berkshire which is likely to have no functional relationship with Newbury/Thatcham but instead with Reading and Wokingham Boroughs.</p>
West Waddy ADP for Gerald Palmer Eling Trust	This is not relevant to the interests of the Gerald Palmer Eling Trust and so no opinion is expressed on this matter.
Woolf Bond Planning for Donnington New Homes	If this proposal is to be progressed then we note that it will require substantial infrastructure provision (with long lead in periods) and collaborative working with Wokingham Borough Council These factors could result in housing delivery not commencing until the very end of the Local Plan at best, with the majority of delivery being post 2036. We would suggest that the allocation of a range of sites, adjacent to existing settlements elsewhere in the District would therefore benefit from allocation to supplement this site and enable delivery at an early stage in the plan period.
Woolf Bond Planning for Donnington New Homes	If this proposal is to be progressed then we note that it will require substantial infrastructure provision (with long lead in periods) and collaborative working with Wokingham Borough Council These factors could result in housing delivery not commencing until the very end of the Local Plan at best, with the majority of delivery being post 2036. We would suggest that the allocation of a range of sites, adjacent to existing settlements elsewhere in the District would therefore benefit from allocation to supplement this site and enable delivery at an early stage in the plan period.
WYG for Donnington New Homes	Donnington New Homes believe that there are significant risks associated with the delivery of much of the Districts housing need through one strategic site, particularly given the specific constraints identified at paragraph 5.8. Donnington

Respondent	Response
	<p>New Homes believe while the strategic site should be considered to meet longer term housing and infrastructure needs, there is a more immediate requirement for the delivery of housing, which can be better met through a range of allocations adjoining the existing main urban areas, particularly as it will ensure a continued distribution of housing across the local plan area. Land at SPS provides a large- scale development, which will benefit from new and approved infrastructure associated with the development of the wider Sandford Park, without the constraints associated with the delivery of the development to the south of Reading - namely the scale of the proposal; its location within the consultation zone of the Atomic Weapons Establishment (AWE) Burghfield (which calls into question whether a development of the scale envisaged can be delivered in this location); the inevitable additional time required to progress the development given its cross-boundary location; the fact that any development in West Berkshire is only likely to be after the main part of the development outside the district has substantially progressed; and the requirements for major new infrastructure including a railway station.</p> <p>It is worth noting that the West of Berkshire Spatial Planning Framework, published in December 2016, identifies opportunities for growth. [Figure 3 of that document] shows the growth options proposed for Newbury. The existing Sandford Park allocation is shown in light blue as a “Large Development Area”, with land to west shown as an “Area of Search” (hatched dark blue). A proportion of the SPS proposal is shown as an Area of Search.</p>

## Summary of responses

Comments were divided on this issue. The majority of respondents who considered that there was potential for development in this area were cautious and felt it was dependent on a number of issues which would need to be resolved, some of which were potentially significant. These included the impact on infrastructure, especially the transport network; the amount of infrastructure that development would require; environmental constraints; AWE constraints; impact on green space and the impact on potential mineral sites.

Local communities who felt that would be directly affected by such a development in this area were not in favour of the proposal, citing similar concerns to those identified above.

Whilst acknowledging that development in this location could be seen as a strategic opportunity for authorities in the Western Housing Market Area some respondents felt that the area south of Reading has little, if any, functional relationship with the remainder of West Berkshire and that development in this location would serve to meet the needs of other authorities, namely Reading and Wokingham rather than West Berkshire. Others also felt that it would also undermine the viability and vitality of the existing settlement hierarchy in the District. At the same time, the risks of delivering through such a large strategic site were highlighted by those in the development industry, in particular the long lead in period for such a development. The need for the Plan to be flexible and to include a range of smaller sites across the District which would be able to deliver at an earlier stage in the plan period was also emphasised by many in the industry.

## Council response

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR).

The four Western Berkshire authorities are committed to meeting the housing requirement across the Western Housing Market Area. To this end the Councils have agreed a Memorandum of Understanding which states that the four authorities will continue to work together to ensure that local plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need in Reading.

Should development be considered appropriate at this location, given the strategic nature of the site, any development would be delivered in partnership with Wokingham Borough Council. Reading Borough Council would also be involved in the process.

Should a large scale development go ahead at Grazeley it would require comprehensive masterplanning to ensure that it was delivered in the most sustainable way. Part of this would involve a detailed transport assessment of the existing network. Given that such a large scale development would likely impact significantly on the existing network, developer contributions from the development would go directly to funding any improvements required. A detailed assessment of the green infrastructure would also be required, including the identification of any suitable alternative greenspace (SANG). There would be a need for extensive consultation with AWE Burghfield and the Office for Nuclear Regulation (ONR) to ensure that any development was compatible the facility at AWE Burghfield and delivered in conformity with the Detailed Emergency Planning Zone (DEPZ).

The Council acknowledges that large new settlements are not without their problems and in seeking to identify land for new homes national policy notes the importance of identifying a mix of sites across the District.

As part of the LPR the Council will review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries. A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q6: Do you agree with our assessment of existing planning policies? Please give reasons for your answer. What do you think works well at the moment and what do you think we could do better? Please clearly identify the policy area or specific policy as a sub-heading.**

Number of responses received: 56

Respondent	Response
<b>Internal</b>	
Archaeology Team West Berkshire Council	There currently are no policies for one of the objectives, ie 6 Culture – this is a major gap. Proposals for developing a Cultural Strategy are currently being considered - contact Paul James <a href="mailto:paul.james@westberks.gov.uk">paul.james@westberks.gov.uk</a> For 7 Heritage we will be looking for opportunities to work with Conservation and others to develop a suite of guidance notes for Development Management which Local Plan could refer to
Public Transport Team West Berkshire Council	Regarding policy area 5 in respect of Town Centres and also having regard to Rural Services Centres and Service Villages, I would urge that the review consider how the vitality (in terms of economic and environmental health) of these tiers of settlement can be enhanced and sustained by actively improving access to and from them by sustainable modes i.e. cycling, walking and public transport. Regarding policy area 9 in respect of Transport, it is important that the successor transport-related policies as envisaged adequately reflect the need for sustainable transport modes to continue to deliver reliable access to education, employment, leisure and shopping opportunities within the District, if these are to replace the current saved policy TRANS1.
<b>Statutory consultees</b>	
Stratfield Mortimer Parish Council	Naturally existing policies can be readily identified which help meet the new draft strategic objectives. However if the strategic objectives need reworking and/or adding to then the policies will need to be expanded, changed or added to. Many of the comments on existing policies simply say they will have to be reworked in the light of the developing review. This is of course perfectly reasonable but it does mean that there can effectively be no comment at this stage. One small matter is that in section 2 Housing of Appendix 2 no mention is made of the housing provision contained within the Mortimer NDP. You also ask for comment on what works well and what could be done better. Really our answer revolves around the need to address the issues that are considered important by the public even if it is only to explain why they cannot be carried forward. As part of this the use of plain English with little or no jargon is vital. So very many times in reading this

Respondent	Response
	scoping document, (and even more so in the Sustainability Analysis), do you find yourself saying what on earth does this actually mean!
Thatcham Town Council	Yes, however ensure that West Berkshire Council abide by their own policies, as it was noted that on occasions this has not always been the case. Policy C1- 'Location of New Housing in the Countryside' it states that this is 'subject to a number of exceptions'. More clarity needed on what these exceptions are how many there are.
Greenham Parish Council	<ol style="list-style-type: none"> <li>1. There are a number of policies that particularly concern us in Greenham. <ol style="list-style-type: none"> <li>1. CS16: Flooding. Although Greenham has not suffered recent flooding, the geology is similar to Thatcham.</li> <li>2. Housing ADPP5. Greenham is included within the Newbury area and distinct from Thatcham.</li> <li>3. CS7 &amp; TS3 – Gypsy and traveller accommodation. We experience unauthorised encampments on Stroud Green and parts of Greenham Common.</li> <li>4. CS1 Delivering new homes and retaining the housing stock. We note there is now a new (2016) Strategic Housing Market Assessment (SHMA) to consider, which affects the overall number of new homes the District will need. We are concerned to avoid having more housing as a result of this inflicted on Greenham.</li> <li>5. CS4 Housing type and mix. We are concerned that developers are either receiving the wrong advice from Housing or not following that advice. What 'further clarification' is needed?</li> <li>6. CS6 Affordable Housing – a 'Written Ministerial Statement' and White Paper on the subject are referred to. Details of these need to be given to us before a response can be made.</li> <li>7. CS9 Location and Type of Business Development needs major review in the light of the 2016 Functional Economic Market Area Assessment (FEMA) and Economic Development Needs Assessment (EDNA). Protected Employment Areas (PEAs) will be reviewed. A proverbial 'coach and horses' are being driven through this PEA policy by the Government allowing Permitted Development for converting commercial buildings to residential use, as with Overbridge Square in Hambridge Lane.</li> <li>8. 'Saved Policy' ECON6 Future of Former Greenham Common Airbase needs review, including its planning brief which is now over 20 years old. We are concerned to see that Greenham Trust is seeking a Local Development Order for the Business Park before this policy has been reviewed.</li> <li>9. Saved Policy RL1 Public Open Space Provision in Residential Development Schemes.</li> <li>10. CS5 Infrastructure Requirements and Delivery does need updating to include "stronger linkages to CIL".</li> </ol> </li> </ol> <p>We are <u>not</u> persuaded that TRANS1 (Meeting the Transport Needs of New Developments) is no longer needed as "covered by other transport related policies". This policy deals with levels of parking and provision of 'transport choices': in these respects the policy seems to us to be failing and need strengthening, not dropping.</p>

Respondent	Response
Burghfield Parish Council	We are broadly in agreement with the contents of Appendix 2. However, I have strong reservations about C6 Extension of Existing Dwellings within the Countryside. At present extensions may not exceed a certain percentage of the size of the original. This policy leads to seemingly endless and usually pointless discussion at Planning Meetings and should be replaced by a statement emphasising that any proposed extension should be appropriate in size and design to the setting of the building. In relation to CS15, we are concerned that Government legislation has weakened the ability of the Local Plan to require high standards of energy efficiency in new homes through the Code for Sustainable Homes, and would urge that a way forward is found to ensure that our new plan nevertheless requires high levels of energy efficiency
Burghfield NDP Steering Group	We are broadly in agreement with the contents of Appendix 2. However, we have strong reservations about C6 Extension of Existing Dwellings within the Countryside. At present extensions may not exceed a certain percentage of the size of the original. This policy leads to seemingly endless and usually pointless discussion at Planning Meetings and should be replaced by a statement emphasising that any proposed extension should be appropriate in size and design to the setting of the building. In relation to CS15, we are concerned that Government legislation has weakened the ability of the Local Plan to require high standards of energy efficiency in new homes through the Code for Sustainable Homes, and would urge that a way forward is found to ensure that our new plan nevertheless requires high levels of energy efficiency.
Sport England	In principle I agree with this approach.
Natural England	<p>Any review of the local plan will need to be compliant with paragraphs 115/116 of the NPPF and should also make reference to the Government's 25 year Environment Plan and proposed amendments to the NPPF.</p> <ul style="list-style-type: none"> <li>• For Policy CS17 Natural England would like to see specific reference made to SSSIs/SACs/SPAs within the Policy. We suggest you add a fourth bullet point in order to incorporate this.</li> <li>• Natural England notes that no reference has been made to the protection of Best and Most Versatile (BMV) agricultural land, ancient woodland, veteran trees, protected/priority species or priority habitat within the actual Policy wording itself. These should be named and referenced within Policy CS17.</li> <li>• Development proposals should provide an adequate amount of ecological survey information to be able to assess the extent of any potential adverse effects/impacts on the above features, prior to the determination of the application. Natural England would like to see this included in the Policy CS17 wording.</li> <li>• Reference should be made in Policy CS17 to avoidance, mitigation and compensation where adverse effects on</li> </ul>

Respondent	Response
	biodiversity are identified. Development should be refused if the requirements of this hierarchy are not met. Natural England would like to see this included in the Policy wording.
Historic England	We consider that the Local Plan Review should include a strategic policy for the conservation and enhancement of the historic environment (on the lines of Policy CS19 of the Core Strategy, but specifically for the historic environment and heritage assets therein), and an accompanying detailed development management policy or policies relating to the different types of heritage asset and setting out the considerations that apply to each.
Highways England	We have reviewed the above documents and note that West Berkshire Local Plan Review to 2036 SA Scoping Report mentions capacity of the road network, particularly around Newbury and Thatcham, the A34 and A339 as a key issue. We also note that West Berkshire Local Plan Review to 2036 Scoping Report (February 2018), In Section 9 – Transport, the WBDLP saved policy TRNS3 A34/M4 Junction 13 Chieveley limits further development at A34/M4 J13 to protect the landscape quality of the area. We look forward working with West Berkshire Council to develop proposals that help facilitate planned growth in West Berkshire whilst protecting safe and efficient operation of SRN.
Environment Agency	<p>The following policies are existing local plan policies for West Berkshire local plan you have asked us to review. We have covered those policies that are within our remit.</p> <p>CS16: Flooding We believe you will need to cover these points within your local plan in order to be compliant with the NPPF paragraphs 93, 94 100.</p> <p>The sequential approach referred to should be the sequential test. The sequential approach is usually applied at the site level for sites that have Flood Zones 1, 2 and 3 within them. The sequential test is about avoidance of locating development in flood risk areas. So the sequential test requires a search for reasonably available sites.</p> <p>The updated flood risk policy should reflect the recommendations of the Strategic Flood Risk assessment (SFRA). This is your evidence base for flood risk for your district.</p> <p>Your policy should also include using new development to reduce the causes and impacts of flooding. Your policy should also consider safe access and egress management from sites at flood risk. Your flood risk policy should also include the impact of climate change.</p> <p>CS7: Gypsies, Travellers and Travelling Showpeople This policy says: “In allocating sites, and for the purpose of considering planning applications relating to sites not identified in the relevant DPD, the following criteria will need to be satisfied for sites outside settlement boundaries: Located outside areas of high flooding risk;”</p> <p>You will need to clarify what is considered to be “high flooding risk”. The location of development and its compatibility with the Flood Zones is set out in Tables 1, 2 and 3 of the Planning Practice Guidance. In Table 2 it says that caravans, mobile homes and park homes intended for permanent residential use are in the highly vulnerable category. Highly vulnerable development should not be permitted in Flood Zones 3a or 3b and we would object to any highly vulnerable</p>

Respondent	Response
	<p>development within Flood Zones 3a and 3b. We advise you to make this clear in your local plan in order for your local plan to be consistent with national policy.</p> <p><b>TS3 Detailed Planning Considerations for Travellers Sites</b> The location of development and its compatibility with the Flood Zones is set out in Tables 1, 2 and 3 of the Planning Practice Guidance. In Table 2 it says that Caravans, mobile homes and park homes intended for permanent residential use are in the highly vulnerable category. Highly vulnerable development should not be permitted in Flood Zones 3a or 3b and we would object to any highly vulnerable development within Flood Zones 3a and 3b. We advise you to make this clear in your local plan in order for your local plan to be consistent with national policy.</p> <p><b>WBDLP saved policy OVS5 Environmental Nuisance and Pollution Control</b> This policy needs to be more specific in defining the environment. We are interested in the water environment. We would like to know if this policy will be updated and if wording about the prevention of pollution to surface water and groundwater quality can be included. This includes the protection of source protection zones (SPZs). We do not want an infiltration in contaminated land. This may create a pathway for contaminated water to the groundwater aquifers. Water resources should also be protected in terms of the supply of water.</p> <p>We recommend that compliance with the water framework directive's 'no deterioration' and getting to 'good' objectives is included in this policy. Your plan needs to comply with the key objectives of the water framework directive (WFD) which are to ensure growth does not cause a deterioration in the overall status of the receiving water bodies and that growth should not prevent good status or alternative objective being achieved.</p> <p>This will keep your local plan consistent with national planning policy which is NPPF paragraphs 109 and 121.</p> <p><b>CS15: Sustainable Construction and Energy Efficiency</b> We need an addition to this policy so it refers to the 'higher water efficiency standard' to be used for new dwellings which is 110/l/p/d in the Building Regulations Approved document Part G.</p> <p><b>CS18 Green Infrastructure</b> We are pleased to see a policy on green infrastructure included in your local plan. However this needs to be expanded to include watercourses and water bodies for 'blue infrastructure.'</p> <p><b>CS5: Infrastructure Requirements and Delivery</b> We expect to see sewage infrastructure and flood defence infrastructure to be covered within your local plan.</p>
Savills for Thames Water Utilities	No objection
<b>General consultation bodies</b>	
Mid & West Berks Local Access Forum	<p><b>Strategic Objective 8: Green Infrastructure &amp; Healthy Living.</b> More thought needs to be given to the availability &amp; proximity of public open space &amp; networks of public paths (public rights of way) close to where they are needed. Existing public open space and existing public paths networks need to be made accessible without using a car and new off-road paths need to be designed into future developments where they will add to the off-road network. This will reduce car use and increase healthy exercise. Too many people are accessing</p>

Respondent	Response
	<p>public open spaces (such as Greenham Common and Snelsmore Common) by car thus adding to congestion. Off-road Community circuits need to be built in to developments.</p> <p>The requirements of dog walkers need to be addressed particularly.</p> <p>The provision of off-road paths often seems to fall between various stools: housing development policies, highway transport policies and rights of way policies.</p> <p>There needs to be better connection between the policies. Perhaps a specific policy needs to be developed for delivery 'green infrastructure'? The Local Access Forum, a statutory body to advise local authorities &amp; others, might have a role here.</p>
British Horse Society	<p>Inclusion of CS12 Equestrian / Racehorse industry in the current plan was a very welcome addition. We fully support this and call for it to be strengthened and expanded in the new plan based on available evidence &amp; data (see the BHS response to the Sustainability Appraisal).</p>
Reading Gospel Hall Trust	<p>See Q7</p>
The Canal and River Trust	<p>RL5</p> <p>The Canal &amp; River Trust (the Trust) is the guardian of the Kennet &amp; Avon Canal as it runs for 45 km through West Berkshire, passing through major towns such as Newbury and Thatcham and villages such as Hungerford and Kintbury. The Trust promotes the canal as a wildlife corridor, heritage asset, an attractive route for sustainable transport (part of National Cycle Route 4), part of the free local health resources providing informal leisure and recreation, (both on the water and on the towpath). The canal also provides a sense of place and brings economic regeneration opportunities to the area. We are aware that the Council understands the benefits that the canal brings to the area and we acknowledge your support and recognition of these benefits in policy documents as multi-functional green infrastructure, wildlife corridor and heritage asset as well an attractive route for sustainable transport and informal leisure and recreation, both on the water and on the towpath.</p> <p>We note that Appendix 2: Assessment of the relevance and effectiveness of the adopted policies from the West Berkshire District Local Plan 1991 - 2006, the West Berkshire Core Strategy 2006 - 2026 and the Housing Site Allocations DPD 2006 – 2026 states that the principles of WBDLP saved policy Policy RL5 Policy on the Kennet and Avon Canal is anticipated to be carried forward into the Local Plan to 2036 however the Council will consider providing further clarification for development management purposes.</p> <p>The Trust would welcome the opportunity to discuss amendments to Policy RL5. The Trust have recently produced an e-planning toolkit which provides advice on the Waterway proofing of planning policies at local plan level. This can be found here.</p> <p>This document set out a need for to help unlock the economic, environmental and social benefits offered by the waterways and to secure the long-term sustainability and use of waterways as assets for the communities through which they pass. encouraging the use of waterways as tourism attractions in their own right, as well as a way to connect other attractions, and so protect the provision of boat services and facilities where required.</p>

Respondent	Response
	<p>In formulating policies, there are several important waterway factors to be considered.</p> <ul style="list-style-type: none"> <li>• There are different types of waterways, which have different characteristics and principal functions.</li> <li>• Waterways are multi-functional by nature.</li> <li>• Waterways are public assets accessible to local communities free of charge.</li> <li>• waterways, towpaths and water spaces are a part of a wider network that crosses administrative boundaries and cannot be viewed in isolation.</li> <li>• There are particular land use implications and locational requirements arising from the inherent constraint of inland waterways being 'non-footloose' assets.</li> <li>• Development and regeneration can impose burdens and liabilities upon the waterway infrastructure, facilities and environs.</li> <li>• There is a need to provide essential boat services and facilities to support the use of waterways for navigational purposes.</li> <li>• Waterways and towing paths are spaces in their own right, and not just settings or backdrops to development or edges to policy designations.</li> </ul> <p>The Trust would like to work with the Council to help carry out a review of this policy, and in reviewing the plan as a whole we suggest the following questions need to be addressed.</p> <ol style="list-style-type: none"> <li>1. Are waterways recognised as a form of local infrastructure within the Local Plan?</li> <li>2. Are the different types of waterways (i.e. the canal and river sections of the Kennet) and their different characteristics and roles acknowledged?</li> <li>3. Have the spatial and land use implications of waterway related issues, opportunities and proposals identified within the Local Transport Plan, local cycling and walking infrastructure plan, local infrastructure plan, local green infrastructure strategy, and so on, been fully translated into the Local Plan?</li> <li>4. Are all the functions of waterways being fully protected and promoted within the Local Plan?</li> <li>5. Are cross-boundary waterway-related issues and opportunities being fully considered with the adjoining local authorities?</li> <li>6. Is there flexibility within the local planning policy framework to accommodate the inherent constraint of waterways being 'non-footloose' assets?</li> <li>7. Does the policy encourage the unlocking of the economic, environmental and social benefits offered by the waterways?</li> <li>8. Does the proposals map indicate waterways and their corridors?</li> <li>9. Does the policy encourage new developments to: integrate land and water; open up access to, from and along the waterway; explore the added value and use of water space; and view the waterway, towpath and environs as part</li> </ol>
Theatres Trust	<p>In terms of Culture, we recommend that the implantation of a strong policy to protect existing uses such as theatres, cinemas and music venues from unnecessary loss. This policy could also be used to cover other facilities which positively contribute towards the well-being of local people, provide valued local services and opportunities for participation in cultural activities such as pubs and community halls. Such a policy should set out criteria required to</p>

Respondent	Response
	demonstrate redundancy or lack of need for the facility, such as evidence of genuine marketing effort at an appropriate value for the existing use. The Trust can assist with the drafting of such a policy. We would also recommend that Town Centre policies promote new or additional community and cultural uses.
<b>Other stakeholders</b>	
Robert Wallace	Planning is dysfunctional - small changes get a lot of attention whilst serious and serial breaches of permission by developers seem to float through the system. It needs to be faster and more certain
David Parry	My primary concerns relate to the sections C1 and CS1 of the attached Local Plan Review. The document refers to a "settlement boundary review" but I could find no further evidence of or links to it. The intent to potentially change settlement boundaries seems to me to be there in a subtle way. The issue of development outside of the boundary is potentially then not important if the boundary has been moved! I have strong concerns about moving settlement boundaries and development outside of them, in particular in village locations. For Pangbourne (where I am based), I do not believe any further expansion is sustainable and the settlement boundary should remain unchanged.
Christopher Gent	It is important to respect the balance between the smaller villages and communities which have a balance between development and countryside and the major towns of Newbury, Thatcham and Hungerford etc.
William Graham	Housing: Clearly, in the Newbury area WBC has big problems bringing current major planning approvals to fruition, e.g. Sandwell. This is giving developers comfort to successfully 'try it on' outside the planned settlement boundaries. In this regard the existing planning policies are not delivering. WBC must find a solution to this problem if it is to retain control. Industry: We query whether WBC is planning to provide enough land and incentives to attract and retain new businesses to Newbury. These will be needed to employ the growing local population planned above.
Neil Richardson	New omission policy needs to allow for appropriate extensions to suitable settlements and development of other well located land for housing to provide for continuity of supply of housebuilding land and to ensure as far as possible that local housing needs are met. 5 yr supply of housebuilding land needs to be available at all times. Policy C1 needs to reflect above.
Julian Worth	Re Policy ECON7 Safeguarding Rail-based Industry at Theale, whilst Theale is primarily a rail aggregates (& cement) terminal, and this traffic will continue to grow, it is important to recognise that consumer goods traffic by rail is also growing rapidly and is now the largest single commodity on Britain's railways at 40% of all volume. West Berks and Reading is a major consuming area for these goods and there is significant interest in using rail to transport consumer goods into the area. Theale is the only location available for modal transfer to road for final delivery and it is important that capability for this is maintained alongside aggregates traffic. It follows that reference to Theale in the Minerals & Waste Local Plan is not sufficient and it should also feature in general economic policies covering non-minerals related issues.

Respondent	Response
<b>Landowners, site promoters and developers</b>	
Barton Willmore for Sulham Estate	<p>Before making any comments in relation to existing planning policies, it is important to note that we do not consider the existing information available within the consultation document to be thorough enough to constitute an 'assessment' of policies.</p> <p><u>CS1: Delivery of New Homes and Retaining the Housing Stock</u>  We agree that the approach to the delivery of housing should be 'updated' to reflect up to date and robust evidence of housing needs. In line with our commentary above we would note that policy CS1 currently delivers a figure which was adopted prior to significant changes in national planning policy and, therefore, is not compliant with the NPPF.</p> <p><u>CS4: Housing Type and Mix</u>  We support the intention of the policy which is to provide a wide choice and mix of housing throughout the District to meet needs. We note that the recommendation within the scoping report is for the principles of the policy to be carried forward but to consider providing further clarification for development management purposes. Whilst we would encourage clarification as this would provide additional certainty for developers, we ask the council to ensure that the emerging position incorporates sufficient flexibility for the mix of dwellings sizes to be reflective of the surrounding environment and development pattern.</p> <p><u>All Site Allocations within the HAS DPD</u>  The recommendation within the scoping report states that the site allocations will be carried forward or amended depending on the progress on the delivery of the site. In addition, the recommendation states that any allocations which have been delivered will be removed. Whilst we support the removal of delivered sites as allocations as a sensible course of action, we question whether site allocations which have not been delivered will be carried forward without further consideration of their prospects for delivery. In particular, if a site has been allocated for some time and there are no signs that progress is being made in terms of bringing the site forward for development, its deliverability should be reviewed to avoid undermining the Council's land supply.</p> <p><u>C1 Location of new housing within the countryside</u>  Firstly, we consider that the current policy position is overly restrictive and the presumption against development outside of settlement contained within this policy could result in a barrier to the delivery of sustainable development. This is inconsistent with the NPPF and, as such, we consider that this policy position should be relaxed to allow the consideration of sites which adjoin the existing settlement boundary subject to other material considerations within adopted local and national planning policy.</p> <p>Secondly, we note that the assessment of this policy states that as part of updating this policy, there will be a settlement boundary review. We are supportive of this review and encourage the council to give detailed consideration to our client's site, Land at Hall Place Farm, Tilehurst.</p> <p>In conclusion, given our reservations in relation to the thoroughness of this 'review', we reserve the right to comment as draft policy wording is published at later stages of the development of the Local Plan Review.</p>

Respondent	Response
Barton Willmore for Graham Child	<p>Overall it is not considered that policies have been specifically ‘assessed’ as the question suggests, however we anticipate this will follow within a later consultation document. Whilst this therefore concludes our initial policy commentary on behalf of our client for this consultation, we reserve the right to comment in more detail when more depth is added to the proposed policies of the emerging Local Plan.</p> <p><u>Area Delivery Plan Policies</u>  Within Appendix 2 of the Scoping Report, in relation to the Area Delivery Plan Policies we note that the Scoping Report notes the appropriateness of the current spatial strategy will be considered in the first instance, before policies for its delivery are developed. This is in line with comments we have made above and we would urge the Council to consider the age of the currently adopted policies.</p> <p><u>CS1: Delivering New Homes and Retaining the Housing Stock</u>  We note that Appendix 2 considers that the approach to the delivery of housing should be ‘updated’ to reflect the evidence of the SHMA. In line with our commentary above we would note that policy CS1 currently delivers a non NPPF compliant housing requirement and should therefore be completely revisited, to reflect the most up to date position.</p> <p><u>Site Allocations within the HSA DPD</u>  We note that Appendix 2 of the Scoping Report proposes to carry the allocations forward depending on progress and remove those which have been delivered. Our client would support this approach, however we would expect up to date evidence to be prepared to support any sites continued inclusion, to avoid shortfalls in supply.</p> <p><u>C1 Location of New Housing in the Countryside</u>  Our client notes that Appendix 2 of the Scoping Report suggests that the list of settlements will be updated as part of the settlement boundary review, which our client is strongly supportive of and requests their site at Pangbourne Hill is given full consideration during the boundary review for Pangbourne. Notwithstanding this, we consider that the policy as worded is overly restrictive by suggesting a “...<b>presumption against new development outside of settlement boundaries</b>...”. Our client does not consider a presumption against sustainable development accords with the principles of the NPPF and does not allow consideration of those sustainable sites which adjoin the settlement boundary of a settlement within the spatial strategy.</p>
Bewley Homes PLC	<p>Policy CS1: Delivering New Homes and Retaining the Housing Stock  This Policy should also include Engagement with neighbouring LPAs.</p> <p>Policy C1: Location of New Housing in the Countryside  In reviewing settlement boundaries, extensions to existing settlements in appropriate sustainable locations can assist in meeting the borough’s housing need.</p> <p>Policy C2: Rural Housing Exception Policy  This Policy should also take into consideration emerging changes to national policy and supporting opportunities to bring forward exception sites that will provide affordable housing to meet identified local needs, and consider whether allowing some market housing on these sites would help facilitate this.</p>

Respondent	Response
	<p>CS5: Infrastructure Requirements and Delivery</p> <p>The recently published Consultation document regarding developer contributions, 'Supporting housing delivery through developer contributions', March 2018 and its recommendations will need to be assessed and reflected in this policy.</p>
Boyer Planning for Spitfire Bespoke Homes	<p>Spitfire welcome the Council's review of their existing planning policies and wish to make the following key observations: Policy CS1 relates to the delivery of new homes and retaining the housing stock. The Council intend to update the policy in light of the evidence from the Berkshire SHMA and any amendment to national policy regarding the assessment of housing need. Whilst Spitfire recognise the need to update the policy in light of the SHMA, it is also important to recognise that smaller rural villages like Beenham which do not feature in the settlement hierarchy should be encouraged to grow in order to support their long term future sustainability.</p> <p>Policy C1 relates to the location of new housing in the countryside. The Council intend to prepare a list of settlements to be updated as part of the settlement boundary review. Spitfire consider that there may be cases where development outside settlement boundaries may provide an appropriate solution to meeting sustainable housing growth, particularly in villages and that it is important that settlement boundaries are not drawn too narrowly which will restrict sustainable housing growth in villages.</p>
Mark Carter for Mr R.L.A. Jones	<p><b>2 Housing</b></p> <p>The Respondent considers that the existing method of examining the four main geographical areas of the District is the most appropriate way to examine future policies (and also the settlement hierarchy within those areas) is the most appropriate for the District.</p> <p>Within the North Wessex Downs Area of Outstanding Natural Beauty Lambourn still has a range of services and reasonable public transport provision which also serve the requirements of surrounding communities and these should be reinforced.</p> <p><b>Policy CS1 Delivering new homes</b></p> <p>The Respondent welcomes the Council's commitment to updating the housing requirements of the Plan for a further 10 years, 2026 to 2036 and looks forward to seeing how these are quantified by the Council.</p> <p><b>HSA19 Lynch Lane Lambourn and HSA20 Newbury Road Lambourn.</b></p> <p>The respondent welcomes the Council's commitment to review these two sites "depending on progress of delivery of the site". However the review should go on to make to clear that where sites have not been delivered or have come up against problems they should be removed as allocations and replaced by sites which are available and deliverable such as the Respondents site at previously identified as LAM007 "land between Folly Road, Rockfel Road and Stork House Drive".</p> <p><b>CS12 Equestrian and Racehorse Industry</b></p> <p>Thus Policy should be updated and further clarification added as suggested.</p>

Respondent	Response
The Chilton Estate	<p><u>Affordable Housing</u></p> <p>The policy for the provision of Affordable Housing should be flexible and facilitate viability assessment to ensure that land is brought forward for development in situations where the amount of social housing may need to be restricted in order to make the development viable.</p>
Fisher German LLP for Mr Musgrave and Begley	<p>Agree that the current spatial strategy should be reviewed. It is considered that each settlement in the settlement hierarchy should be apportioned growth rather than geographical areas.</p>
Gladman Developments	<p>Gladman have reviewed the assessment of existing planning policies that is contained in Appendix 2 of the West Berkshire Local Plan Review to 2036 Scoping Report. It is however considered that all of these policies will need to be reviewed further in due course in light of the emerging revisions to the National Planning Policy Framework and that a comprehensive approach is taken to the Local Plan Review.</p> <p>In relation to Policy CS1: Delivering New Homes and Retaining the Housing Stock, it is vital that this policy is fundamentally reviewed and that the associated evidence that it is based upon is up-to-date. The approach to setting the housing requirement for the District will be the founding basis of any strategy to enable the objectively assessed housing needs of the area to be met in full.</p> <p>CS2, CS3 and all of the site allocations contained in the HSA DPD will need to be carefully reviewed as part of the preparation of the new Local Plan. Up-to-date evidence on the projected delivery of these housing sites will play an important role in determining the scale of additional allocations that will be required to meet development needs over the extended plan period to 2036. In this regard, it is important that realistic start dates and delivery rates are applied to all sites that are to be retained within the Council's housing trajectory and for all related evidence published to accompany any future Local Plan consultations.</p> <p>Gladman are promoting land at Land off Andover Road, Newbury. This site is well related to a highly sustainable settlement and can be brought forward for residential development as part of an appropriate strategy for the sustainable growth of the area. It is a deliverable site that is available, offers a suitable location for development, and is achievable. There would also be a realistic prospect that housing could be delivered on the site within five years and that the development of the sites would be viable. The site also provides the potential to create a link into Sandlford Park and a transport connection across southern Newbury. A copy of the location and extent of the site can be seen at Appendix 1. The current wording of Policy C1 includes a presumption against development. This mechanism prevents the Council from meeting future housing targets and delivering sustainable forms of development. This approach will therefore need to be reviewed as part of the preparation of the new Local Plan to ensure that it is sufficiently responsive to rapid changes in circumstance that can often occur over a plan period. It will also be important for the policies of the Local Plan as a whole to represent a strategy that will meet the requirements of the NPPF in terms of the need to plan for thriving rural communities.</p> <p>Policy CS2 supports rural housing exception sites. Gladman agree that there is a need to update this policy. In addition to</p>

Respondent	Response
	<p>the points raised regarding the lower order settlements within the hierarchy, there may also need to be revisions to support the delivery of starter homes.</p> <p>Policies CS4 relates to housing type and mix. It is considered likely that this policy will need to be reviewed in response to the provisions of the emerging revisions to the NPPF.</p> <p>A range of design related policies are referenced (such as CS14, CS15). There are also a number of other policies, such as CS6: Affordable Housing and those relating to infrastructure requirements that will have an impact on the cost of development in the area. These policies will all need to be considered within the evidence of whole plan viability that is prepared to accompany the new Local Plan in line with the requirements of national policy.</p>
Hallam Land Management	Housing – our comments on the spatial strategy are set out above.
LRM for Bloor Homes & Sandlesford Farm	<p>We are writing on behalf of Bloor Homes and Sandlesford Farm Partnership in response to the current consultation exercise related to the Scope of the Local Plan Review.</p> <p>We note that part of the review process will be to consider existing Core Strategy and Housing Site Allocation DPD policies. In respect of Core Policy CS3 Sandlesford Park, the recommendation in Appendix 2 is that the site allocation is be carried forward or amendments proposed, depending on progress on the delivery of the site.</p> <p>You will be aware that two Outline Planning Applications were submitted by the Bloor Homes/Sandlesford Park and Donnington New Homes for development at Sandlesford Park on the 23rd March 2018.</p> <p>The Sandlesford Park Application seeks planning permission for the following proposed development: up to 1,000 new homes; an 80 bed extra care facility as part of the affordable housing provision; a new 2 form entry primary school (D1); expansion land for Park House Academy School; a local centre to comprise flexible commercial floorspace (A1-A5 up to 2,150 sq m, B1a up to 200 sq m) and D1 use; the formation of new means of access onto Monks Lane; new open space including the laying out of a new country park; drainage infrastructure; walking and cycling infrastructure and other associated infrastructure works.</p> <p>The Sandlesford Park West Application seeks planning permission for the following proposed development: up to 500 new homes (including affordable), a one form entry primary school with land for its expansion to two form entry, replacement and / or expansion land for Park House Academy School, extra care elderly units as part of the affordable housing provision; access from Warren Road and emergency access from Kendrick Road, a recreational facility for families of children with special needs, green infrastructure including children's play areas and informal open space, pedestrian and cycle links to and through the site, sustainable drainage and other infrastructure. our clients submitted an outline planning application on the 23rd March 2018 for the following proposed development.</p> <p>These applications were accompanied by a Memorandum of Understanding signed by the Applicants.</p> <p>The purpose of the Memorandum of Understanding is to set out the commitment that the Applicants have made in principle to work collaboratively together to deliver the comprehensive development of Sandlesford Park. That commitment will be formalised in a Landowners' Agreement.</p> <p>A masterplan and other comprehensive plans and documents have been jointly prepared by the Applicants to ensure the coordinated provision of the infrastructure, services, open space and facilities required in association with the planned</p>

Respondent	Response
	<p>housing development, in accordance with adopted planning policy requirements. Whilst the Applicants are submitting separate Outline Planning Applications for the parts of the site in their respective control, these two planning applications will together deliver the holistically planned comprehensive development sought by the local planning authority. This approach is intended to address the concern expressed previously by the Local Authority that development proposals at Sandford Park could lead to piecemeal development.</p> <p>Sandford Park is a deliverable site; the environmental information submitted with the current planning applications confirm its suitability consistent with the NPPF's planning principles. The fact that the site is controlled by two housebuilders, Bloor Homes and Donnington New Homes further illustrates that the site will be delivered quickly once planning permission is granted.</p> <p>For these reasons, Sandford Park should continue to be allocated in the Local Plan review.</p>
Nexus Planning for Pangbourne Beaver Properties	<p>Appendix 2 of the Scoping Report sets out an assessment of the relevance and effectiveness of the adopted policies from the West Berkshire District Local Plan 1991-2006, the West Berkshire Core Strategy 2006-2026 and the Housing Allocations DPD 2006-2026. We respond in connection with a number of specific policies below:</p> <p>Core Strategy Policy CS1 makes provision for the delivery of the overall housing requirement of at least 10,500 net additional dwellings over the period 2006 to 2026. It outlines four categories of land where it expects new homes will be 'primarily' developed. The Council sets out in the Topic Paper that the policy approach to the delivery of housing will be updated in light of evidence from the Berkshire SHMA and any amendment to national policy regarding the assessment of housing need.</p> <p>PBP Ltd supports the proposal for a fully Framework compliant housing target to be provided for within the emerging Local Plan. However, any replacement for adopted Policy CS1 will need to acknowledge that in order to achieve these targets new homes will be provided on greenfield sites adjoining settlement boundaries in all four of the spatial areas.</p> <p>Core Strategy Policy ADPP1 sets out the Spatial Strategy for the district, including a district settlement hierarchy. PBP Ltd do not object to this approach in principle, however adopted Policy ADPP1 also suggests that below the settlement hierarchy, only appropriate limited development will be allowed in the countryside. By contrast, the policy text is clear that 'most development will be within <u>or adjacent</u> to the settlements included in the settlement hierarchy'. In common with Policy CS1 above, the replacement policy for ADPP1 should clarify beyond any doubt that in addition to the urban area, development will need to come forwards on greenfield sites adjoining settlements in the hierarchy, i.e in the 'countryside'.</p> <p><u>HSA 21 Land north of Pangbourne Hill, Pangbourne</u> - This allocation was the subject of a planning permission ref 15/03320/OUTMAJ for 35 dwellings in February 2016. The site owners PBP Ltd discharged the relevant conditions, fulfilled the requirements of the S106 Agreement, including implementing structural landscaping that is now becoming well established and took the site to the market. The site is now being built out by Millgate Homes with a mix of private and affordable units. This demonstrates that PBP Ltd are able to facilitate and deliver good quality development in a sustainable location that will help to enhance the settlement of Pangbourne.</p>
Nexus Planning for Croudace	<p>Appendix 2 of the Scoping Report sets out an assessment of the relevance and effectiveness of the adopted policies from the West Berkshire District Local Plan 1991-2006, the West Berkshire Core Strategy 2006-2026 and the Housing</p>

Respondent	Response
	<p>Allocations DPD 2006-2026. We respond in connection with a number of specific policies below:</p> <p><b>Core Strategy Policy CS1</b>  Core Strategy Policy CS1 makes provision for the delivery of the overall housing requirement of at least 10,500 net additional dwellings over the period 2006 to 2026. It outlines four categories of land where it expects new homes will be 'primarily' developed. The Council sets out in the Topic Paper that the policy approach to the delivery of housing will be updated in light of evidence from the Berkshire SHMA and any amendment to national policy regarding the assessment of housing need.</p> <p>Croudace Homes welcome the principle that a fully Framework compliant housing target will be embedded within the emerging Local Plan. However, any replacement for adopted Policy CS1 should also have regard to the fact that new homes will be provided on greenfield sites adjoining settlement boundaries.</p> <p><b>Core Strategy Policy ADPP1</b>  Core Strategy Policy ADPP1 sets out the Spatial Strategy for the district, including a district settlement hierarchy. The Council, at Appendix 2 of the Scoping Report, suggests that in connection with policies ADPP1 - 6 that it will consider whether the current spatial strategy for the District is the most appropriate up to 2036. It goes on to suggest that policies for the delivery of the Spatial Strategy will be developed once the principles have been established.</p> <p>Croudace Homes does not object to this approach in principle, however adopted Policy ADPP1 also suggests that below the settlement hierarchy, only appropriate limited development will be allowed in the countryside. By contrast, the policy text is clear that 'most development will be within or adjacent to the settlements included in the settlement hierarchy'. Nonetheless, conflict with Policy ADPP1 was a point levelled against the Henwick Park appeal scheme. In common with Policy CS1 above, the replacement policy for ADPP1 should clarify beyond any doubt that in addition to the urban area, development will need to come forwards on greenfield sites adjoining settlements in the hierarchy, i.e in the 'countryside'.</p> <p><b>HSA DPD Policy C1</b>  Policy C1 of the HSA DPD seeks to restrict housing supply through the identification of settlement boundaries, outside of which there is a presumption against development. However, it should be noted that the HSA DPD is limited to delivering the out-of-date Core Strategy housing requirement.</p> <p>Delivery of a Framework compliant housing target will require settlement boundaries to be redrawn again, to include current greenfield sites on the edge of settlements. Croudace Homes therefore does not object to the principle of the policy being carried forward into the emerging Local Plan to 2036 provided a fully Framework compliant is embedded in the Plan, including greenfield sites on the edge of sustainable settlements. As noted elsewhere, this should include the land at Henwick, Park, which is a sustainable location for growth.</p>
Pegasus Planning Group for Donnington New Homes	<p>Policy ADPP1 Spatial Strategy should be retained, as the current strategy is the most appropriate way to deliver the homes that are needed in West Berkshire over the next plan period.</p> <p>As stated in the Scoping Report, Policy CS1: Delivering New Homes and retaining the Housing Stock should be updated to include the latest evidence on housing supply, and the Objectively Assessed Need (OAN) for West Berkshire should be</p>

Respondent	Response
	<p>determined using the government's new standardised method. The principle of allocating greenfield sites adjoining settlements to accommodate the required housing in all four spatial areas should be retained.</p> <p>The principles of Policy CS4: Housing Type and Mix should be carried forward into the Local Plan to 2036. The policy should be added to, to specifically outline the number of adaptable homes for older people that are required across West Berkshire, and to establish a principle in favour of developments that provide significant numbers of adaptable homes for older people. This would be in line with the Draft Revised NPPF, which places increased importance on the delivery of adaptable homes for older people.</p> <p>All HSA Policies should be reviewed, and any allocations which have been delivered should be removed. Allocations which have not been delivered should be examined, to determine whether there is a realistic prospect of them coming forward during the next plan period. If there clearly isn't, then these sites should be removed from the plan. New housing sites should then be allocated to replace them and meet the full OAN as calculated in Policy CS1.</p> <p>Policy C1 Location of New Housing in the Countryside should be reviewed to determine whether the existing settlement boundaries are the most appropriate. Settlement boundaries should be redrawn where appropriate, to include new allocations on the edges of existing settlements in line with the Spatial Strategy.</p> <p>The lack of policies regarding culture should be addressed, and a specific policy regarding tourism, and the benefits of encouraging tourism through new development, should be created.</p> <p>The principles of Policy CS18: Green Infrastructure should be carried forward into the Local Plan to 2036. If the definition of green infrastructure is clarified, it should continue to include open space and allotments, as these are very important components of the overall green infrastructure in West Berkshire. The Policy should be updated to more clearly state the presumption in favour of developments that provide significant amounts of green infrastructure.</p>
Pegasus Planning Group for Donnington New Homes	<p>Principles of Policy CS16: Flooding should be carried forward into the Local Plan to 2036, but further information should be added regarding the benefits of schemes which provide towards flood risk mitigation measures, and can manage and reduce the flood risk on site and the surrounding areas, including especially where the flood risk to existing homes is reduced.</p> <p>Policy ADPP1 Spatial Strategy should be retained, as the current strategy is the most appropriate way to deliver the homes that are needed in West Berkshire over the next plan period.</p> <p>As stated in the Scoping Report, Policy CS1: Delivering New Homes and retaining the Housing Stock should be updated to include the latest evidence on housing supply, and the Objectively Assessed Need (OAN) for West Berkshire should be</p>

Respondent	Response
	<p>determined using the government's new standardised method. The principle of allocating greenfield sites adjoining settlements to accommodate the required housing in all four spatial areas should be retained.</p> <p>All HSA Policies should be reviewed, and any allocations which have been delivered should be removed. Allocations which have not been delivered should be examined, to determine whether there is a realistic prospect of them coming forward during the next plan period. If there clearly isn't, then these sites should be removed from the plan. New housing sites should then be allocated to replace them and meet the full OAN as calculated in Policy CS1.</p> <p>Policy C1 Location of New Housing in the Countryside should be reviewed to determine whether the existing settlement boundaries are the most appropriate. Settlement boundaries should be redrawn where appropriate, to include new allocations on the edges of existing settlements in line with the Spatial Strategy.</p>
Pegasus Planning Group for Wasing Park Estate	<p>Existing Policy CS10: Rural Economy supports economic growth in rural areas and encourages appropriate farm diversification. The Scoping Report confirms that this policy is to be updated along with saved policies ENV16 and ENV19 related to farm diversification and the reuse and adaption of rural buildings. This approach is supported – Policy CS10 should be updated to align with Paragraphs 84 and 85 of the Draft Revised NPPF as set out above.</p> <p>Pegasus Group act on behalf of the Wasing Estate in relation to their land interests. The Wasing Estate is working to develop a long-term business plan and vision plan with the objective of making the estate as sustainable as possible, and these emerging proposals currently include:</p> <ul style="list-style-type: none"> <li>• An organic farm, providing local food produce to the Estate's own markets – their wedding venue, a restaurant, hotel, and local box schemes;</li> <li>• A wellbeing operation which is part of the Estate's aim to become a leading hospitality centre in the UK;</li> </ul> <p>Liaising with local villages and communities to ensure that the Estate is working to help with infrastructure needs such as schooling, the aging population, housing need, pubs and village centres;</p> <ul style="list-style-type: none"> <li>• The need for more housing to staff the growing business at Wasing Estate, preferably flats or terraced homes, ultimately to house another 50 – 100 people;</li> <li>• The need to encourage tourism in rural areas and to promote the tourism industry throughout West Berkshire.</li> </ul> <p>Policy CS10 should be updated to include reference to Paragraphs 84 and 85 of the Draft Revised National Planning Policy Framework, and reflect the importance of the rural economy.</p> <p>Land under the control of the Wasing Estate has a clear role to play in ensuring a prosperous rural economy in West Berkshire. The Local Plan Review should include a new policy to facilitate the delivery of the emerging Wasing Estate Plan.</p>
Pro Vision for Cala Group and Wates Developments	<p>All policies will need to be reviewed to ensure that they accord with the revised NPPF and PPG. We have the following Policy specific comments:</p> <ul style="list-style-type: none"> <li>• ADPP1 : Spatial Strategy. In principle we support the existing Spatial Strategy (see our comments above). The role and</li> </ul>

Respondent	Response
	<p>function of Rural Service Centres and Service villages should be reviewed. To accord with the draft NPPF, they should be identified as being suitable to accommodate further sustainable development that will enhance or maintain their viability and vitality. Whilst the growth potential of the smaller villages will be more limited, there is no justification to, as a matter of principle, restrict development to infill only. By the same token, in the countryside, infill should be acceptable where it would not result in the development of isolated homes (as Policy CI now allows).</p> <ul style="list-style-type: none"> <li>• CSI: Delivering New Homes and Retaining the Housing Stock. See our comments above about assessing local housing needs. Local policies will need to identify non strategic sites and development opportunities. All settlement Policy boundaries will need to be reviewed.</li> <li>• CS3: Sandford Strategic Site Allocation. This allocation should be deleted unless the LPA is satisfied that there is robust evidence that is developable.</li> <li>• CS4: Affordable Housing. Will need to be updated in light of the draft NPPF. Housing allocations and delivery policies will need to be Viability Tested.</li> <li>• CI Location of New Housing in the Countryside. Should be updated generally and specifically to: 1) extend the categories of development allowed as an exception to the general presumption to include the redevelopment of the sites of redundant rural buildings (similar to the former ENV20 policy of the West Berkshire District Local Plan) and 2) enable the sustainable growth and expansion of all types of business in rural areas through conversion and well-designed new buildings.</li> <li>• C2 Rural Housing Exception Policy. Should be generally updated and informed by Viability Testing. Guidance about the scope and extent of "facilitating" market housing should be provided.</li> <li>• CS8: Nuclear installations - AWE Aldermaston and Burghfield. We support the proposed review. This Policy currently fails to apply the assessment of risk proportionately to individual sites.</li> <li>• CS9 and 10: Business and Rural Economy - will require comprehensively reviewing to accord with the revised NPPF.</li> <li>• ENV19: Re-use and adaptation of rural buildings. Should be reviewed and merged with Policy C4.</li> <li>• CS18: GreenInfrastructure: The review needs to clarify the definition of GI. The current list of land use typologies can be (and has frequently been) applied to any area of undeveloped land.</li> <li>• CS6:Infrastructure. The review and updating of this policy will require full Viability Testing.</li> </ul>
Pro Vision for Rootes Trustees	<p>All policies will need to be reviewed to ensure that they accord with the revised NPPF and PPG. We have the following Policy specific comments:</p> <p>ADPPI : Spatial Strategy. In principle we support the existing Spatial Strategy (see our comments above). The role and function of Rural Service Centres and Service villages should be reviewed. To accord with the draft NPPF, they should be identified as being suitable to accommodate further sustainable development that will enhance or maintain their viability and vitality. Whilst the growth potential of the smaller villages will be more limited, there is no justification to, as a matter of principle, restrict development to infill only. By the same token, in the countryside, infill should be acceptable where it would not result in the development of isolated homes (as Policy CI now allows).</p>

Respondent	Response
	<p>CSI: Delivering New Homes and Retaining the Housing Stock. See our comments above about assessing local housing needs. Local policies will need to identify non strategic sites and development opportunities. All settlement Policy boundaries will need to be reviewed.</p> <p>CS3: Sandleford Strategic Site Allocation. This allocation should be deleted unless the LPA is satisfied that there is robust evidence that is developable.</p> <p>CS4: Affordable Housing. Will need to be updated in light of the draft NPPF. Housing allocations and delivery policies will need to be Viability Tested.</p> <p>CI Location of New Housing in the Countryside. Should be updated generally and specifically to: 1) extend the categories of development allowed as an exception to the general presumption to include the redevelopment of the sites of redundant rural buildings (similar to the former ENV20 policy of the West Berkshire District Local Plan) and 2) enable the sustainable growth and expansion of all types of business in rural areas through conversion and well-designed new buildings.</p> <p>C2 Rural Housing Exception Policy. Should be generally updated and informed by Viability Testing. Guidance about the scope and extent of "facilitating" market housing should be provided.</p> <p>CS8: NuclearInstallations - AWE Aldermaston and Burghfield. We support the proposed review. This Policy currently fails to apply the assessment of risk proportionately to individual sites.</p> <p>S9 and 10: Business and Rural Economy - will require comprehensively reviewing to accord with the revised NPPF.</p> <p>ENV19: Re-use and adaptation of rural buildings. Should be reviewed and merged with Policy C4.</p> <p>CS18: GreenInfrastructure: The review needs to clarify the definition of GI. The current list of land use typologies can be (and has frequently been) applied to any area of undeveloped land.</p> <p>CSS:Infrastructure. The review and updating of this policy will require full Viability Testing</p>
Pro Vision for Greenham Trust	<p>The Trust has the following comments on the existing Development Plan policies. Saved policy ECON6 – Future of the Greenham Common Airbase.</p> <p>The Trust welcomes a review of the current policy position for the former air base. Saved policy ECON6 relates to the 'Technical Area' of the former airbase, previously known as New Greenham Park in the Local Plan. The site is now known as 'Greenham Business Park'.</p>

Respondent	Response
	<p>A clear and positive policy framework is very important for the continued success of the business park. It would be appropriate, however, for new policy to recognise that the park has already established as a mixed-use park including elements outside of the traditional business use classes. It is appropriate for the Local Plan to continue to focus on these business uses, but also recognise that a wider range of use is typically associated with 21st century business parks. For example, limited amounts of small scale convenience retail can help to sustain business parks and reduce the need for employees to leave the site for basic daily facilities and services.</p> <p>In reviewing the “role and function” of the park, it is important to recognise that Greenham Business Park represents one of, if not the, key employment areas in the district. The revised policy position should positively reflect this and provide a clear framework for managing growth and evolution of the park through the plan period.</p> <p>It is agreed that review of the saved policy should also involve a review of the supplementary guidance for the former airbase. It may be that this guidance is no longer fit-for-purpose. Policy CS9 Location and type of business development</p> <p>‘New Greenham Park’ is acknowledged to be a strategically important employment site under this adopted policy of the West Berkshire Core Strategy (2006 to 2026). The policy stated that subsequent Development Plan Documents would consider whether this and other established employment sites should be given a protected status. The Trust presumes that the LPA sees the Review of the Local Plan to be the appropriate opportunity for this review.</p> <p>In principle, the Trust would welcome a strategic level policy that noted the strategic importance of Greenham Business Park followed by a site-specific development management policy.</p> <p>Local Development Order</p> <p>There is an extant planning permission for comprehensive redevelopment of the park dating back to the MoD’s disposal of the former airbase in the 1990s. Implementation of this permission has been slow, however, due to the inflexibility of the approved but speculative masterplan. Regeneration of the site has therefore been more ad hoc through a series of individual planning permissions driven by market demand, some of which have been implemented or partially implemented.</p> <p>In terms of the scale of regeneration permitted, over half of the permitted floorspace is still to come forward. Greenham Business Park therefore represents a significant opportunity for the effective reuse of previously developed land in line with national policy (as set out in our comments under Question 2).</p>

Respondent	Response
	<p>The Trust is working closely with West Berkshire Council to prepare a Local Development Order (LDO) for the site. The objective of the LDO is to introduce a more flexible development management framework to allow the park to respond to market demand more effectively. It also involves addressing all the key planning issues upfront thereby simplifying the planning process as and when suitable development opportunities come forward. This scheme of simplified planning can make a significant difference between new business and job opportunities coming to West Berkshire or going elsewhere in the UK or internationally and can also be a very positive tool for supporting existing businesses and organisations so that they can grow and adapt here without needing to relocate with the loss of jobs from the local economy.</p> <p>The Draft Revised NPPF continues to encourage LPAs to use LDOs in appropriate locations (paragraph 52). The benefits of an LDO specifically at Greenham Business Park are recognised by the Council's Economic Development Officer.</p> <p>Although an LDO no longer must be linked to adopted policy (Planning Act 2008 Section 188[1]), it would be preferable for the LDO, once formally adopted by the Council, to be underpinned by the Local Plan.</p> <p>P1 Residential Parking for New Development</p> <p>The Trust welcomes the review of parking standards, including addressing parking for non-residential development.</p> <p>Parking standards should offer some flexibility to ensure that appropriate levels of vehicle and nonvehicular parking are provided for the precise function, or range of functions of the non-residential development.</p>
Pro Vision for Audley Group	<p>We support the proposed review and update of saved policy ENV27 (Development on existing institutional and education sites in the countryside).</p> <p>Given that West Berkshire is a largely rural district, it is important the revised Local Plan continues to include positive policies for supporting residential institution sites in the countryside.</p> <p>As noted in our response to Question 2, residential institutions make a significant contribution to sustaining the local rural economy. As well as supporting the evolution of existing schemes, the revised Local Plan should also support opportunities for new schemes in appropriate locations where redevelopment opportunities may arise. For example, it would be appropriate to support the reuse of existing rural sites for residential institutions which might otherwise come under pressure for development as market housing or worse might even be abandoned, with inevitable detriment to local rural communities.</p> <p>Residential institutions such as those provided by Audley are low-impact developments that are well suited to rural areas. For example, Audley retirement communities typically have noticeably lower levels of traffic as the sites offer excellent social and recreational facilities and there is a low level of car ownership.</p> <p>The revised Local Plan should provide clarification of the saved policy that residential institutions are not only related to education but are increasingly also related to elderly care communities.</p>

Respondent	Response
	<p>A positive policy is also needed to ensure that existing residential institution sites, such as Audley's elderly care community at Inglewood, can evolve and adapt to changing requirements. For example, established rural sites often have opportunities for appropriate extension to existing buildings or effective reuse of other previously developed land within their curtilage to improve the accommodation and facilities, or even for justified and well-reasoned limited greenfield expansions. It should not be necessary for such proposals to be treated negatively and wholly as 'exceptions' to policy. Rather, a criteria-based policy should provide a clear framework for managing these opportunities. By positively planning for the evolution of existing sites, the revised Local Plan will help to reduce the pressure for new greenfield development sites in the rural area.</p>
Pro Vision for Rivar	<p>Do you agree with our assessment of existing planning policies? Please give reasons for your answer. What do you think works well at the moment and what do you think we could do better? Please clearly identify the policy area or specific policy as a sub-heading.</p> <p>All policies will need to be reviewed to ensure that they accord with the revised NPPF and PPG. We have the following Policy specific comments:</p> <ul style="list-style-type: none"> <li>• ADPPI : Spatial Strategy. In principle we support the existing Spatial Strategy (see our comments above). The role and function of Rural Service Centres and Service villages should be reviewed. To accord with the draft NPPF, they should be identified as being suitable to accommodate further sustainable development that will enhance or maintain their viability and vitality. Whilst the growth potential of the smaller villages will be more limited, there is no justification to, as a matter of principle, restrict development to infill only. By the same token, in the countryside, infill should be acceptable where it would not result in the development of isolated homes (as Policy CI now allows).</li> <li>• CSI: Delivering New Homes and Retaining the Housing Stock. See our comments above about assessing local housing needs. Local policies will need to identify non strategic sites and development opportunities. All settlement Policy boundaries will need to be reviewed.</li> <li>• CS2: Newbury Racecourse Strategic Site Allocation. At a strategic or local policy level, consideration should be given to a potential extension of the existing site allocation.</li> <li>• CS4: Affordable Housing. Will need to be updated in the light of the draft NPPF. Housing allocations and delivery policies will need to be Viability Tested.</li> <li>• CI Location of New Housing in the Countryside. Should be updated generally and specifically to: 1) extend the categories of development allowed as an exception to the general presumption to include the redevelopment of the sites of redundant rural buildings (similar to the former ENV20 policy of the West Berkshire District Local Plan) and 2) enable the sustainable growth and expansion of all types of business in rural areas through conversion and well-designed new buildings.</li> <li>• C2 Rural Housing Exception Policy. Should be generally updated and informed by Viability Testing. Guidance about the scope and extent of "facilitating" market housing should be provided.</li> <li>• CS8: Nuclear Installations - AWE Aldermaston and Burghfield. We support the proposed review. This Policy currently fails to apply the assessment of risk proportionately to individual sites.</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• CS9 and 10: Business and Rural Economy - will require comprehensively reviewing to accord with the revised NPPF.</li> <li>• ENV19: Re-use and adaptation of rural buildings. Should be reviewed and merged with Policy C4.</li> <li>• CS18: GreenInfrastructure: The review needs to clarify the definition of GI. The current list of land use typologies can be (and has frequently been) applied to any area of undeveloped land.</li> <li>• CS6: Infrastructure. The review and updating of this policy will require full Viability Testing.</li> </ul>
RPS for AWE	<p>1. AWE agree that Policy CS8 requires updating in light of the current review of the Detailed Emergency Planning Zones. In the interest of public safety, and in response to increasing demand for housing land in close proximity to the Inner Land Use Planning Consultation Zones at both sites, the Detailed Emergency Planning Zones (DEPZs) set out in Policy CS8 should be updated and fully enforced. The distances for the Inner Zone (Aldermaston 0-1.5km; Burghfield 0-1.5km), Middle Zone (Aldermaston 3-5km; Burghfield 1.5-3km) and Outer Zone (Aldermaston 5-8km; Burghfield 3-5km) will be reviewed in line with the updated DEPZs and enforced by the Council under Policy CS8. AWE continue to fully support Policy CS8 in advising that residential development in the Inner Land Use Planning Consultation Zones is likely to be refused planning permission by the Council where the ONR has advised against that development. This is especially relevant when considering the potential large-scale development south of Reading in the vicinity of AWE Burghfield.</p> <p>2. Policy CS9 recognises the AWE sites as strategically important for the District's economy. AWE agree that policy CS9 should be updated and request that a bespoke designation consistent with the importance of AWE to the local economy (and national security) is made. The Council will be aware of AWE's willingness to jointly progress a Local Development Order for their sites at Aldermaston and Burghfield, and a meeting is currently being arranged to start this process. The supporting text to policy CS9 raises the potential for "bespoke designation"; this is an option AWE would like to pursue through the LDO mechanism, supporting the business development potential of these strategically important employment sites.</p>
Savills for Englefield Estate	No specific comment is made at this stage, although in many cases where it is noted that 'consider providing further clarification for development management purposes' this is welcomed.
Joy Schlaudraff	It should be for easier for people to get their land allocated for housing. The council should not pick and choose the land which is offered, but allocate it all, as long as acceptable in planning terms.
Tetlow King Planning Ltd for Rentplus UK Ltd	Our comments relate to the proposed review of <b>Policy CS6</b> on the provision of affordable housing, which is timely following a significant number of national policy consultations and in particular the release on 5 March of the draft proposed changes to the National Planning Policy Framework, which is widely expected to take effect later this year. The rent to buy model has been recognised within the proposed changes to the Framework. The draft changes set out the Government's commitment to supporting people in saving for a deposit while paying a below-market rent; this is intended to help many more working households into home ownership. Part (d) of the proposed definition of affordable housing is set out below:

Respondent	Response
	<p>1. d) <b>Other affordable routes to home ownership:</b> is housing provided for sale that provides a route to ownership for those who could not achieve home ownership through the market. It includes shared ownership, relevant equity loans, other low cost homes for sale and rent to buy (which includes a period of intermediate rent). Where public grant funding is provided, there should be provisions for the homes to remain at an affordable price for future eligible households, or for any receipts to be recycled for alternative affordable housing provision or refunded to Government or the relevant authority specified in the funding agreement.</p> <p>A substantial level of funding set aside for the delivery of affordable housing through Homes England (formerly Homes and Communities Agency) was recently returned to Treasury, unspent; negotiation on planning application requirements, planning obligations and discharge of planning conditions are key constraints on the speed of the planning system in building out consented schemes. The Council should look to follow the course set by national policy by ensuring its housing policies include provision for rent to buy housing as part of the affordable housing mix.</p> <p>Policy CS6: Provision of Affordable Housing should be amended to reflect the wider definition of affordable housing set out in the changes to the NPPF currently subject to consultation, and as set out above now to include 'other affordable routes to home ownership'. In response to Question 6, our recommendations for amendments to the policy are set out here:</p> <p>In order to address the need for affordable housing in West Berkshire a proportion of affordable homes will be sought from residential development. The Council's priority and starting expectation will be for affordable housing to be provided on-site in line with Government policy(48).</p>
Turley for Berfeld Limited	<p>CS16: Flooding</p> <p>We consider that there should be explicit recognition in the policy that some type of development is acceptable in flood risk areas, and that the aim of the policy should be to safeguard against inappropriate development in flood risk areas. "Inappropriate development" is defined as all conventional residential dwellings and other structures that are not flood proof. Flood proof dwellings never flood, do not make flooding worse elsewhere, provide safe access and egress and do not increase the burden on emergency services and are supported by a site specific flood risk assessment.</p> <p>C1: Location of New Housing in the Countryside</p> <p>We objected to the wording of Policy C1 when it was proposed as part of the Housing Site Allocations DPD on the grounds that went beyond the policy approach adopted in the Core Strategy.</p> <p>Area Delivery Plan Policy 1 of the Core Strategy sets out the Council's spatial strategy. The policy begins: "Development in West Berkshire will follow the existing settlement patterns and comply with the spatial strategy set out in the Area Delivery Plan policies of this document based on the four spatial areas". It continues in the second paragraph: "Most development will be within or adjacent to the settlements included in the settlement hierarchy set out below, and related</p>

Respondent	Response
	<p>to the transport accessibility of the settlements (especially by public transport, cycling and walking) their level of services and the availability of suitable sites for development. The majority of development will take place on previously developed land”.</p> <p>The spatial strategy therefore rightly places the focus for new development on “following” existing settlement patterns, seeking to locate “most” development within or adjacent to settlements and on “previously developed land”. It does not however, expressly prevent new residential development outside existing settlements and in doing so, allows a degree of flexibility to consider proposals that lie outside of settlement boundaries but that may nonetheless be considered sustainable development.</p> <p>It is regrettable that Policy C1 was adopted in its current form in the HSADPD and in common with our comments above under questions 3 and 4, a more flexible approach should be allowed for. Such restrictive wording does not allow for less orthodox developments or the changes that may lead us to different ways of living and working in the future and we therefore recommend the Council take a more, not less, flexible approach.</p> <p>CS18: Green Infrastructure</p> <p>We support the Council’s desire to revisit the wording of this policy to ensure that it reflects the health and environmental benefits of green infrastructure, and should recognise the benefits of living in an environment that creates such opportunities.</p>
Turley for A2dominion Housing Group	We consider that the existing policies should be reviewed based on updated evidence and changes in national planning policy.
Turley for Commercial Estates Group	Policies ADP1 to ADP6 will need to be reconsidered in light of any revisions to the spatial strategy which emerge as a consequence of the Local Plan Review. Accordingly, we will comment on the efficacy and wording of any new (and/or revised) policies, as may be proposed when the Draft Plan is published for consultation.
Turley for North East Thatcham Consortium	<p>Overall, the Consortium’s position is that policies should be reviewed in light of the evidence base produced by the Council and the national planning policy context in place as the Local Plan Review progresses (bearing in mind the likely publication of the revised Framework later in 2018). This is considered to be of particular relevance to the following policy areas.</p> <p><i>Housing policies</i></p> <p>There is a clear requirement to review policies relating to overall housing provision to ensure that the emerging Local Plan Review meets the housing needs of West Berkshire in full. It is agreed that reference should be made to the Berkshire (including South Bucks) Strategic Housing Market Assessment and its conclusion that housing needs are significantly higher at 665 dwellings per annum than the existing Core Strategy provides for (525dpa), or than have been annually</p>

Respondent	Response
	<p>delivered to date on average (500dpa). This evidences the increase in housing provision needed in West Berkshire to support anticipated job creation, which requires a more marked increase in the labour force than would be expected to result from a continuation of historic demographic or development trends.</p> <p>Such an elevation in the overall level of housing provision will also have implications for the spatial distribution of growth in West Berkshire, and the Consortium therefore agrees that the appropriateness of the spatial strategy should be kept under review as the plan-making process evolves. Reflecting their status in the settlement hierarchy, the urban areas of Newbury, Thatcham and the eastern settlements close to Reading will be expected to play an important role in meeting the higher need for housing evidenced in the district.</p> <p>Policies relating to housing type and mix must also be reviewed to ensure that the type and size of housing delivered responds to evidenced needs. The SHMA highlighted the significant need for homes with three or more bedrooms, which is expected to account for most (62%) of the market housing needed in the HMA and over half (55%) of its overall housing needs. While the Consortium considers that a revised policy should not be overly prescriptive, this clearly highlights the importance of identifying a balanced portfolio of sites capable of accommodating the family housing needed in West Berkshire and the wider housing market area over the emerging plan period.</p> <p><i>Economic policies</i></p> <p>The Core Strategy drew upon economic evidence produced in 2007, thereby reflecting the significantly different economic context which predated the recession. The Inspector noted the availability of some updated evidence produced in 2011 – which continued to be influenced by the recession and subsequent recovery – and highlighted the Council's intentions to update this evidence to inform the Site Allocations and Delivery DPD. While this update to the economic evidence base was commissioned and published, the scope of the Site Allocations and Delivery DPD was subsequently reduced to focus exclusively on housing sites.</p> <p>It is therefore imperative that the Local Plan Review fully reflects the latest evidence on West Berkshire's economy and the conclusions of the Economic Development Needs Assessment (EDNA) on the land required to support future employment growth, and identifies sites capable of meeting the concluded need for up to 75.2ha of additional employment land over the period to 2036. The Local Plan Review must adopt a positive and sufficiently flexible approach to create the conditions through which investment can be attracted and businesses' needs are met.</p> <p><i>Town centre policies</i></p> <p>The Consortium agrees that the policy approach to retail and town centres must be updated to take account of the latest available evidence, namely the Western Berkshire Retail and Commercial Leisure Assessment produced in 2016. This acknowledges proposals for the redevelopment of Thatcham town centre, in order to strengthen and enhance its role as a shopping destination. The importance of the extant permission for the redevelopment of the Kingsland Centre is noted within the evidence, with a requirement for additional comparison floorspace in the town were this permission to expire without implementation.</p> <p>The Local Plan Review can contribute towards creating the conditions through which this investment can be made, realising the opportunity to regenerate the town centre and achieve the vision for a strengthened and vibrant retail centre. Through the sustainable growth of Thatcham over the plan period, a growing residential population can be</p>

Respondent	Response
	<p>accommodated, increasing patronage and footfall and generating additional expenditure for local shops and businesses. Thus housing growth in Thatcham has a key role to play in supporting the town centre's regeneration.</p> <p><i>Infrastructure policies</i></p> <p>The Local Plan Review must take a sufficiently progressive view as to how infrastructure provision and the accommodation of housing needs can be realised in parallel. In Thatcham for example where the provision of new housing will be a pre-requisite of supporting the regeneration of the town, a strategic view must be taken of the full infrastructure needs associated with growth to ensure that they can be addressed and delivered.</p> <p>Directing additional development towards Thatcham would enable the provision of a range of infrastructure which would serve the needs of not only new developments but also provide opportunities to address strategic and long standing social infrastructure deficiencies in the town.</p> <p><i>Site specific policies and allocations</i></p> <p>The Consortium does not consider that site specific policies should simply be retained unless built out. The Consortium considers that allocations should be removed if they are unlikely to be achieved / delivered during the period to 2036.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>The Gerald Palmer Eling Trust has the following comments to make on the Council's assessment of existing policies:</p> <p><b>Housing policies</b></p> <p><b>Policy C1 Location of New Housing in the Countryside:</b> The Council's comment on this policy in the column entitled 'recommendation' is: '<i>Principles of this policy anticipated to be carried forward into the Local Plan to 2036. List of settlements to be updated as part of settlement boundary review.</i>' The commitment contained in this wording to carrying out a settlement boundary review is supported. However, it is considered that more information needs to be provided about the scope of the review and the methodology that will be followed and that this must be subject to public consultation at an early stage in the process so that there is a consensus about the methodology to be applied. As the current settlement boundaries were defined in the West Berkshire District Local Plan 1991 – 2006 they are now seriously out of date. As a result in some cases development has taken place in the interim which is outside of the current settlement boundary and encloses undeveloped land that is still currently outside of the settlement boundary. This is the case, for example, at Hampstead Norreys, where the existing dwelling at Red Cottage and adjoining land is still outside the settlement boundary, despite the adjoining land to both east and west already having been developed as indicated on the attached site location plan L01. Logically this land should therefore be within the settlement boundary. A review of settlement boundaries is also fundamental to determining the capacity of West Berkshire to accommodate the housing need identified in the Strategic Housing Market Assessment and its distribution across the District. The settlement boundary review should therefore be a priority for the Local Plan review.</p> <p><b>C2 Rural Housing Exception Policy:</b> The comment that consideration is to be '<i>given to permitting such schemes adjacent to Rural Service Centres, as well as those rural settlements lower down the settlement hierarchy,</i>' is supported. This is currently the situation under policy C2 and it is vital that this continues to be the case in order to satisfy the pressing need for more affordable housing in rural settlements.</p>

Respondent	Response
	<p><b>Policies C4 Conversion of Existing Redundant Buildings in the Countryside to Residential Use; C5 Housing Related to Rural Workers; C6 Extension of Existing Dwellings within the Countryside; C7 Replacement of Existing Dwellings; C8 Extension of Residential Curtilages:</b> In the case of all these policies the proposal is to carry the principle of the policy forward, with the comment '<i>Consider providing further clarification for development management purposes,</i>' with no identification of what the further clarification might be. It is considered that these policies have worked well, particularly in enabling a new use to be found for redundant rural buildings, which often have heritage value and make an important contribution to the landscape. The principle of carrying these policies forward is therefore strongly supported and it is considered that they do not need to be subject to any significant change.</p> <p><b>Economy</b></p> <p><b>CS10: Rural Economy:</b> This policy together with 'saved' West Berkshire District Local Plan 1991 – 2006 <b>policies ENV.16 on Farm Diversification and ENV.19 on the Re-Use and Adaption of Rural Buildings</b> currently provide a positive framework for rural business developments, which is strongly supported as it fully accords with national planning policy contained in paragraph 28 of the National Planning Policy Framework. This states that: <i>'Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:</i></p> <ul style="list-style-type: none"> <li>• <i>support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;</i></li> <li>• <i>promote the development and diversification of agricultural and other land-based rural businesses;</i></li> <li>• <i>support sustainable rural tourism and leisure developments that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and</i></li> <li>• <i>promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.'</i></li> </ul> <p>This positive approach to rural businesses is also supported by the North Wessex Downs AONB Management Plan, which states in paragraph 8.3 that: <i>'The North Wessex Downs Partnership believes that promoting and supporting local enterprise is a key part of conserving and enhancing the character and special qualities of the area. Local businesses are likely to:</i></p> <ul style="list-style-type: none"> <li>• <i>employ local people;</i></li> <li>• <i>provide services to improve the local quality of life;</i></li> <li>• <i>spend money locally;</i></li> <li>• <i>promote community cohesion; and</i></li> <li>• <i>have a smaller environmental footprint (by reducing the transportation of goods from across communities).</i></li> </ul>

Respondent	Response
	<p><i>People like to live in a high quality environment. This attracts some businesses as it helps them retain staff. Support for small local businesses will provide local jobs and enhance the rural economy. For example, fast broadband is crucial for a healthy rural economy and we will work with relevant agencies to secure such infrastructure.'</i></p> <p>The Council's recommendation is that the policy approach is 'to be updated, alongside ENV.16 and ENV.19, and other policies relating to the rural economy.' It is important that as part of this process the current positive approach is retained in order to ensure the prosperity of the rural economy of West Berkshire in accordance with Government and North Wessex Downs AONB Management Plan policies.</p>
Woolf Bond Planning for Donnington New Homes	<p>We support the carrying forward of Policy C4 (Conversion of Existing Redundant Buildings in the Countryside to Residential Use) in the Local Plan Review. This policy provides an appropriate policy that acknowledges the benefit of converting existing redundant buildings to public and private beneficial uses, consistent with paragraphs contained in the emerging NPPF discussed above.</p>
WYG for Donnington New Homes	<p>Adopted Core Strategy Policy CS3 (July 2012) allocates land at Sandleford Park as a Strategic Site allocation, for the phased delivery of up to 2,000 dwellings. Supporting text confirms that, "some flexibility in delivery is anticipated, with at least 1,000 dwellings proposed to be delivered by 2026, but with the ability to increase this amount if monitoring or changing circumstances indicate that this is necessary". This flexibility in approach is supported, particularly given that the policy was adopted in 2012 and that housing requirements have increased since this time. Land at "Sanfoin" to the west of Sandleford Park was allocated in the subsequent Housing Site Allocations DPD which was adopted in 2017, and this site now forms part of the Sandleford Park West proposals which are the subject of a current outline planning application. Donnington New Homes welcomes the proposal at Appendix 2 of the Local Plan Scoping Report to carry forward the allocation at Sandleford Park, particularly the recognition that amendments can be included in the new local plan to reflect current circumstances.</p> <p>In March 2018, planning applications are being submitted by Donnington New Homes and by Bloor Homes / Sandleford Farm Partnership, together proposing the development of up to 1,500 homes at Sandleford Park, with associated infrastructure including new roads, schools, a country park, local centre and open space, as well as providing a site for the local charity, Swings and Smiles, to deliver a facility providing support to local families with children with special needs. Together, these two planning applications comprise a cohesive and comprehensive package of development proposals for Sandleford Park which meet the Council's policy requirements. As proposed, the dwelling numbers fall below the threshold of "up to 2,000 dwellings" set out at Policy CS3 and this is largely due to a desire to provide a high-quality development, with associated infrastructure and with a high provision of open space. The applicants have sought to avoid an overly-developed scheme, which while maximising numbers, would not deliver the scale of green infrastructure proposed through these two, complementary applications. However, on the basis of the submitted planning applications referred to above, construction of the first phases of the Sandleford Park development is now likely to commence during 2019.</p> <p>Significantly, the Sandleford Park South development would also facilitate the provision of a southern link road, serving both the proposed extension and the wider Sandleford Park development and alleviating the section of the A343 Andover</p>

Respondent	Response
	<p>Road through Wash Common. The proposal for this route is shown at Appendix A of this representation in the Sandleford Park Extension and Wash Common Relief Road “Call for Sites” submission. The concept masterplan is repeated here for reference: (see attached document).</p> <p>In response to the question set out at 6.1 of the Local Plan Scoping Report, “<i>Do you agree with our assessment of existing planning policies</i>”, DNH supports the recommendation to include Policy CS3, but also requests that a <b>new policy</b> is introduced to <b>allocate the Sandleford Park South site</b> to deliver up to 500 additional dwellings to be served by the additional section of the Sandleford Park main access road between the A343 at Sandpit Hill and the southern edge of the existing Sandleford Park allocation at New Warren Farm. It is also proposed that this section of new road is added to Policy TRANS1A (Road Schemes) which sets out key transport schemes and protects identified land on the Policies Map for such schemes.</p> <p>The Sandleford Park West illustrative masterplan submitted with the current outline application has been designed to retain the flexibility for primary and secondary school provision to cater for the needs arising from Sandleford Park South, and the main access route has been designed to facilitate its southerly extension to Wash. It is important to note that the submitted planning application for Sandleford Park West includes reserve education campus land. The SPW planning application generates a requirement for the provision of a 1 Form Entry Primary School, but additional land has been reserved for the expansion of this school to 2 Form entry. Expansion/replacement land (1.6ha) is also reserved for Park House School (adjacent to the PHS campus southern boundary). This is in addition to the provision required by the Core Strategy allocation, should this be necessary in order for the school to expand appropriately and in a plan led manner.</p>

## Summary of responses

The majority of respondents agreed with the Council’s aim to assess existing planning policies, including where there will be clarification for development management purposes (such as Core Strategy CS4). Some site promoters said that there was not enough information to be able to make an assessment of policies.

Some respondents highlighted specific concerns within their remit that will be considered further as the Review progresses and which will be taken forward through the development of particular policies. This includes the needs of the racehorse and equestrian industry, flooding, heritage assets, transport, water infrastructure, sport and recreation, community/cultural facilities, the Kennet and Avon Canal, and the expansion of Theale rail terminal.

There was general consensus that appropriate extensions to sustainable settlements may be a way forward. Some respondents, notably from the general public, were concerned with a settlement boundary review, and were keen to ensure a balance is retained between smaller villages and the main towns in the District. The housing number going forward needs to be based on up-to-date evidence, and would need to include greenfield sites.

New Greenham Park and the Atomic Weapons Establishment were keen to see a new policy or amendment to CS9 to reflect the strategic importance of both areas of employment.

There was a suggestion that there should be a review of all site allocations in the Housing Site Allocations DPD, including a review of sites which have not been delivered. One respondent was concerned that the delay in delivering sites such as Sandleford was having the effect of developers submitting schemes for unallocated land outside of settlement boundaries (e.g. North Newbury).

Other comments received focus on including a policy for the redevelopment of redundant rural buildings, similar to Local Plan Policy ENV20; the clarification of green infrastructure; expanding Local Plan Policy ENV27 to include residential institutions for elderly care; that Core Strategy Policy CS16 should recognise any public benefits of development through flood risk management and mitigation; for Core Strategy CS6 to take into account the changes to the definition of affordable housing outlined in the NPPF; and for a review of retail centres to take into account available evidence.

### **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR). Where respondents have highlighted specific concerns they will be taken forward through the development of either strategic or local policies as appropriate.

The importance of an adequate, up to date and relevant evidence base is acknowledged. As part of the LPR the Council will review the character of and evidence it has for the existing spatial areas and consider whether it can introduce flexibility by reviewing boundaries. A review of the spatial distribution of development across the District will also be done through a review of the settlement hierarchy and settlement boundaries. The Council intends to consult on both the methodology for the settlement hierarchy and criteria for the review of settlement boundaries in Nov/Dec 2018.

### Responses received to the Local Plan Review Scoping Report (February 2018)

**Q7: Are there any other policy issues that you think should be considered as part of the review of the Local Plan? If so, what are they and tell us why you think they should be included.**

Number of responses received: 56

Respondent	Response
<b>Internal</b>	
Environmental Health West Berkshire Council	<p>I note that policies OVS5 Environmental Nuisance and Pollution Control and OVS6 Noise Pollution OVS6 are to be reviewed. The PPG documents referred to (23&amp;24) are no longer valid and the Council's approach to pollution &amp; noise should be reviewed. In particular noise policy should be updated to reflect terminology /approach of Noise Policy Statement for England and NPPF. I would refer you to document entitled 'ProPG Planning and Noise' developed by the Institute of Acoustics, ANC and the CIEH  <a href="http://www.ioa.org.uk/sites/default/files/14720%20ProPG%20Main%20Document.pdf">http://www.ioa.org.uk/sites/default/files/14720%20ProPG%20Main%20Document.pdf</a>            Air Quality Policy - Just to note that the protection and improvement of local air quality is a priority for the Council and we are currently developing a 'planning and air quality guidance' document. A draft version of this has already been circulated internally for comment.</p>
Public Transport Team West Berkshire Council	No, I do not consider that there are any other policy issues to be considered as part of the Local Plan review.
<b>Statutory consultees</b>	
West Berkshire Health and Wellbeing Board	<p>West Berkshire's Health and Wellbeing Board have recently met and asked me to request that the West Berkshire Local Plan Review to 2036 considers the role that good design can play in the long term health and wellbeing of residents and workers in West Berkshire.            In addition, the Health and Wellbeing Board would welcome the opportunity presented by the West Berkshire Local Plan Review to 2036 for a new policy to be included for significant developments to include health and wellbeing opportunities, both hard (new health facilities) and soft (formal public open space) in their designs.            We also welcome the opportunity to work closely with you and your team in the production of the plan.</p>

Respondent	Response
Bracknell Forest Council	<p>In relation to the Localism Act and the Duty to Co-operate (and based on the strategic priorities listed in para. 156 of the National Planning Policy Framework), Bracknell Forest Council would ask you to take the following into account in preparing your Local Plan Review to 2036 document:</p> <ul style="list-style-type: none"> <li>• Representatives from this Council should be involved in any discussions relating to strategic issues (including consideration of possible joint evidence studies) as enlarged below;</li> <li>• The homes and jobs needed in the area; <ul style="list-style-type: none"> <li>○ Discussions on housing need, including affordable, following joint working on the evidence base relating to the Strategic Housing Market Assessment and the West of Berkshire Spatial Planning Framework. With regards to Gypsy and Traveller provision, Bracknell Forest Council has published a new Gypsy and Traveller Accommodation Assessment following the change in definition in Annex 1 of the</li> </ul> </li> <li>• The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and the provision of minerals and energy (including heat); <ul style="list-style-type: none"> <li>• <ul style="list-style-type: none"> <li>○ Representatives from this Council should be involved if any development is of such a size/significance (including minerals and waste provision), that it could result in implications for infrastructure provision within Bracknell Forest, in particular</li> </ul> </li> </ul> </li> <li>• Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including <ul style="list-style-type: none"> <li>○ Part of your Borough is seemingly within 5 km and within 7km of the Thames Basin Heaths SPA. The implications are that developments up to 7km may need to provide mitigation measures. It is advisable that you contact Natural England (NE) on this matter. It should be noted that the Habitat and Species Regulations have been updated, with the most recent regulations published in 2017. Bracknell Forest Council is currently agreeing a methodology with NE regarding the air quality assessment which will be undertaken as part of the HRA for the Bracknell Forest Local Plan which will include an in-combination assessment. We look forward to sharing information on this issue in the future with West Berkshire Council, as appropriate.</li> </ul> </li> </ul> <p>The 'Bracknell Forest Local Plan' (BFLP) provides the long term spatial vision and development strategy for the Borough up to 2034. A consultation on the draft BFLP, including draft SA, draft HRA and draft Infrastructure Delivery Plan took place during February/March this year. It is hoped to arrange a Duty to Co-operate meeting with the relevant bodies to discuss issues raised, over the next couple of months.</p> <p>We welcome the opportunity for on-going discussion relating to the preparation of the above documents, and would be willing to attend meetings, workshops, respond to consultation material as appropriate, and ask to be kept informed of any future consultations.</p>
Wokingham Borough Council	<p>Thank you for consulting Wokingham Borough Council on the Local Plan Review to 2036 Scoping Report and SA Scoping Report for West Berkshire. WBC has reviewed these documents and does not wish to make any comment at this</p>

Respondent	Response
	stage. We welcome this local plan review, and look forward to future progress on the Sustainability Appraisal and future consultations for the new plan.
Basingstoke & Deane Borough Council	Thank you for consulting Basingstoke and Deane Borough Council on the Scoping Report for a review of the Local Plan. We would like to offer our support for the review and its longer timeframe and also support the continuation of discussions through the Duty to Cooperate, particularly in relation to housing provision, transport infrastructure, environment and resource efficiency, the North Wessex Downs AONB, and also developments near licenced nuclear installations. We look forward to working with you further as the Plan progresses.
Cumbria County Council	Thank you for inviting Cumbria County Council to comment. This is an officer level response. We have no comment to make at this early stage in the process but please do keep us informed of progress as, given our shared experience of hosting a nuclear facility, we would be particularly interested to see your waste planning policies with regard to radioactive waste. Regarding the Duty to Cooperate, we are not aware of any strategic issues to raise at present but if you wish to discuss any matters going forward as the Plan progresses, please do not hesitate to contact me on the details below.
Stratfield Mortimer Parish Council	This has largely been dealt with via the comments on the other questions but in summary are:- <ul style="list-style-type: none"> <li>• Consideration of likely technological and social changes during the plan period.</li> <li>• Greater consideration of the use of policies to foster community spirit</li> <li>• Greater consideration of the use of policies to foster the health and wellbeing of the residents of the area</li> <li>• Far more consideration of what an ageing population will require in terms of development and social/health support</li> <li>• A realistic infrastructure plan which melds far more elements of public policy and private provision together than is the case at present.</li> <li>• A strategy for coping with the likely shortfall in provision and demand for infrastructure of all sorts in the future.</li> <li>• A strategy for meeting increased expectations not just in quantitative terms but also in the quality of provision</li> <li>• Improvements to biodiversity</li> </ul>
Holybrook Parish Council	We note that very little attention or positive action has been given to general infrastructure; roads, GP surgeries, leisure facilities, educational establishments etc. With 280 dwellings designated for Holybrook Parish and a further 285 planned for the neighbouring Pincents Hill (amounting to over 500 dwellings in a concentrated area) there will be, approximately, an additional 1000 cars per day using just one junction on the already over-burdened A4 Bath Road. It is noted that the report speaks of encouraging the use of cycling, public transport and walking. However, the current cycle-ways are very narrow making them dangerous for users, particularly along the A4 and across junction 12 of the M4 motorway. Currently, any residents in Holybrook Parish who wish to access West Berkshire Council's leisure facilities would have to

Respondent	Response
	<p>spend an unacceptable amount of time using public transport. The nearest sports centre is Willink which has no direct bus route from the Parish.</p> <p>It is widely acknowledged that we are an aging population. Therefore, walking any distance can prove difficult for many people. Consequently, senior citizens rely on their cars for shopping and access to leisure. The Parish Council fully supports a greener future and the provision for this but it must be acknowledged that the dependency on the car will not go away.</p> <p>The need for improved services to match the housing quota defined by Central Government, is imperative. Our roads in the east of the district are overburdened and some positive action needs to be taken to address the situation. The quality of life for our residents will be severely impaired if housing is not matched by infrastructure improvements.</p>
Burghfield Parish Council	<p>No.</p> <p>Housing design - there needs to be more consideration of the environmental impact of the house design and contraction as well as the energy required for the house to function (heat light etc) in the future.</p> <p>General infrastructure within and around the new developments should include</p> <ul style="list-style-type: none"> <li>• Well lit pavements for walking and cycle routes to minimise car use, these should encourage safe walking and cycling to both the area centre and the adjacent centres. For example it should be safe to walk and cycle to / from Burghfield to Mortimer, Theale and Reading if the number of homes is being increased.</li> <li>• This is particularly important with the inadequate parking proposed per bedroom (this needs increasing)</li> </ul> <p>Parking spaces for all new housing should have electric supply for charging cars in all parking spaces (whether house allocated or not).</p>
Burghfield NDP Steering Group	No.
Network Rail	<p>As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements. With this in mind I would strongly urge that when the council undertakes its viability testing for any proposed allocated sites it considers the impact the proposal may have on the railway infrastructure. The cost of mitigating any impact may have a bearing on the viability and deliverability of any such proposed site.</p> <p>Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's infrastructure.</p> <p>Level Crossings</p> <p>Any development of land which would result in a material increase or significant change in the character of traffic using a rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that the safety</p>

Respondent	Response
	<p>will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission.</p> <p>Network Rail has a strong policy to guide and improve its management of level crossings, which aims to; reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users / stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned by the impact the proposed site allocation would have on the safety and operation of these level crossings. The safety of the operational railway and of those crossing it is of the highest importance to Network Rail.</p> <p>Councils are urged to take the view that level crossings can be impacted in a variety of ways by planning proposals:</p> <ul style="list-style-type: none"> <li>• By a proposal being directly next to a level crossing</li> <li>• By the cumulative effect of development added over time</li> <li>• By the type of crossing involved</li> <li>• By the construction of large developments (commercial and residential) where road access to and from site includes a level crossing</li> <li>• By developments that might impede pedestrians ability to hear approaching trains</li> <li>• By proposals that may interfere with pedestrian and vehicle users' ability to see level crossing warning signs</li> <li>• By any developments for schools, colleges or nurseries where minors in numbers may be using a level crossing.</li> </ul> <p>It is Network Rail's and indeed the Office of Rail Regulation's (ORR) policy to reduce risk at level crossings not to increase risk as could be the case with an increase in usage at the three level crossings in question. The Office of Rail Regulators, in their policy, hold Network Rail accountable under the Management of Health and Safety at Work Regulations 1999, and that risk control should, where practicable, be achieved through the elimination of level crossings in favour of bridges or diversions.</p> <p>The Council have a statutory responsibility under planning legislation to consult the statutory rail undertaker where a proposal for development is likely to result in a material increase in the rail volume or a material change in the character of traffic using a level crossing over a railway.</p> <p>We would appreciate the Council's providing Network Rail with an opportunity to comment on any future planning policy documents as we may have more specific comments to make (further to those above). We look forward to continuing to work with you to maintain consistency between local and rail network planning strategy.</p>
Savills (UK) Ltd for Thames Water Utilities Ltd	<p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. New development should be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 156 of the National Planning Policy Framework (NPPF), March 2012, states: <b><i>“Local planning authorities should set out strategic policies for the area in the Local Plan. This should include strategic policies to deliver:.....the provision of infrastructure for water supply and wastewater....”</i></b></p>

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	<p>Paragraph 162 of the NPPF relates to infrastructure and states: <b><i>“Local planning authorities should work with other authorities to: assess the quality and capacity of infrastructure for water supply and wastewater and its treatment.....take account of the need for strategic infrastructure including nationally significant infrastructure within their areas.”</i></b></p> <p>The web based National Planning Practice Guidance (NPPG) published in March 2014 includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <b><i>“Adequate water and wastewater infrastructure is needed to support sustainable development” (Paragraph: 001, Reference ID: 34-001-20140306).</i></b></p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for water supply and network infrastructure both on and off site;</li> <li>• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul> <p>In light of the above we recommend the new Local Plan include the following policy/supporting text:  <b><i>PROPOSED NEW WATER/WASTEWATER INFRASTRUCTURE POLICY</i></b>  <b><i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i></b></p> <p>Proposed new Policy text to support the above policy: <b><i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company [Thames Water] as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</i></b></p>

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	<p><b>SUDS</b></p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the wastewater system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Thames Water recognises the environmental and economic benefits of surface water source control, and encourages its appropriate application, where it is to the overall benefit of their customers. However, it should also be recognised that SUDS are not appropriate for use in all areas, for example areas with high ground water levels or clay soils which do not allow free drainage. SUDS also require regular maintenance to ensure their effectiveness.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SUDS not only help to mitigate flooding, they can also help to:</p> <ul style="list-style-type: none"> <li>• improve water quality</li> <li>• provide opportunities for water efficiency</li> <li>• provide enhanced landscape and visual features</li> <li>• support wildlife and</li> <li>• provide amenity and recreational benefits.</li> </ul> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the new Local Plan: <b><i>“It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding.”</i></b></p>
Sport England	<p>The economic, social and health benefits of sport:</p> <p><a href="https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/">https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/</a>  <a href="https://www.sportengland.org/research/benefits-of-sport/health-and-benefits-of-sport/">https://www.sportengland.org/research/benefits-of-sport/health-and-benefits-of-sport/</a>  <a href="https://www.sportengland.org/research/benefits-of-sport/social-value-of-sport/">https://www.sportengland.org/research/benefits-of-sport/social-value-of-sport/</a></p> <p>These three areas can create sustainable, healthy, cohesive and robust communities. Sport is often overlooked in particular in its economic benefits to local economies.</p>
Historic England	<p><b>Appendix 1: Considerations for Development Management policies</b></p> <p><b>Archaeology</b></p> <ul style="list-style-type: none"> <li>• The preservation of scheduled monuments and other nationally important archaeological sites and their settings; and</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• The preservation, in situ, of other archaeological remains or, in those cases where this is not justifiable or feasible, provision is made for excavation recording; and</li> <li>• Requiring that an appropriate assessment and evaluation is submitted as part of the planning application in areas of known or potential archaeological interest.</li> <li>• Appropriate publication/curation of findings</li> </ul> <p><b>Listed Buildings</b></p> <ul style="list-style-type: none"> <li>• Ensuring that proposed alterations, extensions or changes of use to listed buildings, or development in their vicinity, will not have an adverse impact on those elements which contribute to their special architectural or historic interest including, where appropriate, their settings;</li> <li>• Taking measures to ensure that neglected listed buildings are appropriately repaired and re-used.</li> </ul> <p><b>Conservation Areas</b></p> <ul style="list-style-type: none"> <li>• Ensuring that development within or which would affect the setting of a conservation area will conserve or enhance those elements which contribute to its special character or appearance;</li> <li>• Safeguarding spaces, street patterns, views, vistas, uses and trees which contribute to the special character or appearance of that conservation area.</li> <li>• Where they exist, reference to the fact that Conservation Area Appraisals will be used to guide development in those areas.</li> <li>• Where up-to-date Conservation Area Appraisals are not available developers are required to submit character statements to demonstrate the impact of the development upon their character and appearance of the conservation area.</li> </ul> <p><b>Historic Parks and Gardens</b></p> <ul style="list-style-type: none"> <li>• Safeguarding features which form an integral part of the special character or appearance of the Park or Garden;</li> <li>• Ensuring that development does not detract from the enjoyment, layout, design, character, appearance or setting of the Park or Garden, key views out from the Park, or prejudice its future restoration;</li> </ul> <p><b>Locally important heritage assets</b></p> <ul style="list-style-type: none"> <li>• Setting out definitions of what constitutes a locally important or 'non-designated' heritage asset.</li> <li>• Providing criteria for their assessment for development proposals, including alteration and extension, and demolition.</li> <li>• Ensuring applicants are required to demonstrate significance and setting out information requirements for applications.</li> </ul>

Respondent	Response
Transport for London	Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the scoping reports
Environment Agency	<p>We strongly recommend the inclusion of the following policy in order to be consistent with national planning policy -</p> <p><b>Watercourse policy</b></p> <p>We expect to see a policy included for the conservation and enhancement of river corridors to ensure that your local plan is deliverable and compliant with National Planning Policy Framework (NPPF) paragraphs 99, 109, 114 and 117. For this policy we would like to see an identical policy to that of the adopted Wycombe District Council Policy DM15 of the Delivery and Site Allocations Plan adopted 2013.</p> <p>This policy says:</p> <p>“DM15 Protection and Enhancement of River and Stream Corridors</p> <ol style="list-style-type: none"> <li>1. Planning permission will only be granted for development proposals which would not have an adverse impact on the functions and setting of any watercourse and its associated corridor.</li> <li>2. Development should seek to conserve and enhance the biodiversity, landscape and recreational value of the watercourse and its corridor through good design.</li> <li>3. Opportunities for de-culverting of watercourses should be actively pursued. Planning permission will only be granted for proposals which do not involve the culverting of watercourses and which do not prejudice future opportunities for de-culverting (including on sites specifically identified in High Wycombe town centre).</li> <li>4. Development proposals adjacent to or containing a watercourse should provide or retain a 10m buffer between the top of the river bank and the development, and include a long term landscape and ecological management plan for this buffer.” <p>Site allocations policies</p> <p>We expect to the site allocations polices to address onsite constraints such as flood risk, main rivers and their ecological buffer zones, sewage capacity and the impact on the receiving watercourses, groundwater quality and contaminated land including past historic uses. Source protection zones, pollution prevention and climate change. All of these constraints are likely to have an impact on the deliverability of development on a site.</p> </li></ol>
<b>General consultation bodies</b>	
CPRE Berkshire	It is time WBC had a proper policy on Light Pollution, alongside OVS6 on Noise Pollution, they are equally important. WBC has performed badly compared to some other LAs, (eg RBWM) despite it being largely in the AONB with Dark Sky areas. Complaints get passed 'environmental health' and nothing gets done. It is time the subject came squarely under Policy and Development Control.

Respondent	Response
	<p>A particular problem area is lighting of gateways where there is a huge range of installations, some good some very bad - lights that point up to the sky from ground level or higher, lights that shine out to the road and dazzle people trying to walk along a lane in th dark, or in some cases passing drivers.</p> <p>We suggest the main principles here should be:  gateway lights should illuminate the ground, not the sky or the highway.  Excellent examples of best practice may be seen on the walls of the car-park of the Hampstead Norreys community shop, and the gates of Walcroft at Kiln Corner, Upper Basildon: such examples are worthy of inclusion in the WBC 'Quality Design' document.</p> <p>Another widespread problem is the cheap high-power so-called 'spotlights' put up that illuminate a wide area. They should not illuminate other peoples property or the highway. There should be powers to require screening panels to limit spread sideways, as well as above so that the light source cannot be seen from afar. The same applies to high power sports ground lighting, but here, at last WBC has achieved reasonable control with planning applications.</p>
Mid & West Berks Local Access Forum	<p>We refer to the Forum's policy statement on development:  <b>Policy relating to Planning Applications for Housing, Roads, Minerals &amp; Waste sites and other industrial sites</b></p> <p>The Forum is a statutory body set up under the CROW Act 2000 to advise local authorities and other bodies on public access, including the improvement of public rights of way for recreational and utility purposes.  The CROW Act 2000 required all local authorities to produce a Rights of Way Improvement Plan (ROWIP) which can be found on the relevant local authority website. The plan has a number of objectives which relate to maintaining and improving the public rights of way network and also the development of new and improved public access generally.  The Forum will consider the following when commenting on plans.  That, the development:</p> <ol style="list-style-type: none"> <li>i. does not adversely affect existing public rights of way or other public open spaces in the area;</li> <li>ii. offers equivalent, or improved, diversion of existing public right of way affected by the development;</li> <li>iii. provides increased and / or improved off-road access to the existing public rights of way network in the area, and to existing and new facilities, open spaces and the countryside;</li> <li>iv. provides increased and /or improved off-road access for as many different user groups as possible, that is, pedestrians, cyclists, equestrians and disabled users;</li> <li>v. Provides paths which are definitive, rather than permissive, and are therefore added to the definitive map and statement;</li> <li>vi. Conforms to the British Standard '<i>Gaps, Gates and Stiles</i>' and Defra's guidance "<i>Good practical guidance for Local Authorities on compliance with the equalities act 2010</i>".</li> </ol>
British Horse Society	<p>Not as long as the new local plan includes an Equestrian / Racehorse objective which includes racing <b>and</b> non-racing activities (these include professional, semi-professional and recreational activities - see the BHS response to the Sustainability Appraisal).</p>

Respondent	Response
Forestry Commission South East and London Area Office	<p><b>Local Plans and ancient woodland – Forestry Commission approach</b></p> <p>The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.</p> <p><b>A summary of Government policy on ancient woodland</b></p> <p><a href="#">Natural Environment and Rural Communities Act 2006</a> (published October 2006).</p> <p><b>Section 40</b> – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.</p> <p><a href="#">National Planning Policy Framework</a> (published March 2012).</p> <p><b>Paragraph 118</b> – “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss”.</p> <p><a href="#">National Planning Practice Guidance</a> – Natural Environment Guidance. (Published March 2014)</p> <p>This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a <a href="#">non-statutory consultee</a> on “<i>development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in <a href="#">Natural England’s Ancient Woodland inventory</a>), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings</i>”</p> <p>It notes that <b>ancient woodland is an irreplaceable habitat</b>, and that, in planning decisions, <b>Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework</b>. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.</p> <p><a href="#">Standing Advice for Ancient Woodland and Veteran Trees</a>. (Published April 2014)</p> <p>The Forestry Commission has prepared joint <a href="#">standing advice</a> with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees.</p> <p>The Standing Advice website will provide you with links to <a href="#">Natural England’s Ancient Woodland Inventory</a>, <b>assessment guides</b> and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. <b>Case Decisions</b> demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our <a href="#">website</a>.</p> <p><a href="#">The UK Forestry Standard</a> (3rd edition published November 2011).</p>

Respondent	Response
	<p><b>Page 24</b> “Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance SLNCIs).  <a href="#">Keepers of Time</a> – A Statement of Policy for England’s Ancient and Native Woodland (published June 2005).  <b>Page 10</b> “The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland”.  <a href="#">Natural Environment White Paper “The Natural Choice”</a> (published June 2011)  <b>Paragraph 2.53</b> - This has a “renewed commitment to conserving and restoring ancient woodlands”.  <b>Paragraph 2.56</b> – “The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites”.  <a href="#">Biodiversity 2020: a strategy for England’s wildlife and ecosystem services</a> (published August 2011).  <b>Paragraph 2.16</b> - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).  Renewable &amp; low carbon energy  The resilience of existing and new woodland is a key theme of the Forestry Commission’s work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.  Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.  Flood risk  The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.  The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.  In the wider planning context the Forestry Commission encourages local authorities to consider <a href="#">the role of trees in delivering planning objectives</a> as part of a wider integrated landscape approach. For instance through:</p> <ul style="list-style-type: none"> <li>• the inclusion of <a href="#">green infrastructure</a> (including <a href="#">trees and woodland</a>) in and around new development; and</li> <li>• the use of locally sourced wood in construction and as a sustainable, <a href="#">carbon lean fuel</a></li> </ul>
Reading Gospel Hall Trust	<p>Provision of adequate community facilities is vital to the social health of every local community. Yet the existing local plan to 2026 is silent as to a district-wide policy, apart from vague reference to 'infrastructure' in policy CS5.  The only mentions of 'community facilities' as such in the plan are:</p> <ul style="list-style-type: none"> <li>• P27 ADPP2 In Newbury existing cf’s will be protected [nothing about applications for additional facilities]</li> <li>• P27 para 26 in Thatcham provision of cf s will be encouraged, but only within the town centre</li> </ul>

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	<ul style="list-style-type: none"> <li>• P36 ADPP5 In the north Wessex Downs area limited development including of swill be allowed</li> <li>• P46 para 13 In Sandlesford Park cfs associated with the new housing are mentioned.</li> </ul> <p>This leaves substantial settlements like Theale and Tadley, not to mention the many villages, with no policy guidance. We think this should be rectified.</p> <p>Use class DI covers a wide range of community uses, with widely varying spatial and locational requirements. As such it is not easy for Councils to allocate land for these uses, nor to make generic guidance. Nevertheless, we would encourage the Council to consider including policy wording which states that where a local need is demonstrated sympathetic consideration will be given.</p> <p>One relevant factor to take into consideration is that some community facilities are promoted by charitable organisations reliant on voluntary funding, and unable to compete with house builders and others for prime sites. Where promoters can demonstrate a history of failed attempts within settlement boundaries, many Councils allow for use of sites outside settlements, and we would encourage West Berkshire to do the same.</p> <p>Recent Government-commissioned advice to Councils on provision of places of worship is pertinent. Appended to this statement is a publication <i>Faith Groups and the Planning System: Policy Briefing</i>, which was commissioned by DCMS. This document, issued as Government advice to LPAs, covers the needs of all faith groups, and makes recommendations as to a wide range of policy changes needed in the changing social environment of Britain.</p> <p>Recommendations 13 to 15 [The Planning Framework] are most relevant.</p> <ul style="list-style-type: none"> <li>• 13. ... <i>local authorities should prioritise protecting space for social infrastructure including places of</i></li> <li>• <i>Local authorities should ... 'move towards a proactive mode of needs provision'</i></li> </ul> <p>We would encourage the Council to engage with this policy briefing.</p> <p>Reading Gospel Hall Trust has a growing congregation in the area, and we anticipate that we will have need for further halls in the Plan period, most likely in the eastern part of the District.</p>
West Berkshire Spokes	<p>West Berkshire Spokes see the Local Plan as an opportunity to commit further investment for sustainable forms of transport to make cycling and walking more attractive for the benefit of all West Berkshire residents.</p> <p>There are a number of proposals for new improved cycle routes that have been identified in partnership with West Berkshire Cycle Forum that will help to mitigate the effects of development. These include proposals to improve the condition of the Kennet &amp; Avon Canal towpath (not just in the vicinity of the racecourse, but across the entire district), creation of new quietways to and from developments (i.e. Sandlesford and North Newbury) and bring up to standard the existing cycle network as per the 2016 Cycle Working Group Report.</p> <p>Furthermore the restoration of a shared use path on the old Newbury to Didcot Railway Line would provide opportunities for active travel to help make outlying villages such as Long Lane, Curridge, Hermitage, Hampstead Norreys and, possibly in the future, Compton, more sustainable locations for development. The first phase of making the dismantled rail track accessible to the public has begun this year and is expected to be complete by 2019. More investment and commitment to a vision to open the entire route would provide a community asset for West Berkshire residents that would become a tourist attraction in its own right, as well as an off-road cycle track that links into existing routes and attractions</p>

Respondent	Response
	such as Oxford, the Ridgeway and Stonehenge. We would like to see the Local Plan safeguard the route for this purpose in order to prevent further sections from being lost to development.
<b>Other stakeholders</b>	
Neil Richardson	As above, need for new policy to provide flexibility in ensuring sufficient housebuilding land brought forward for varied local housing needs throughout the Plan period. Potential Omission Sites. Specific sites potentially suitable as extensions to settlements or for housing development in well located areas can be identified in due course.
Philip John Williams	Why are you sending me this? It's all too detailed and would take an age to assimilate. I tried but you have to drill down into the information and get bored and annoyed the further you get into it. Please someone use some common sense pay a bit more of our money and have it shortened so it can be readily understood.
Liz Rigarlsford	I think it is brilliant that you keep us informed!!! Although not able to attend the meeting, you more than compensated for my absence. Thank you, I will watch with interest this project, which I personally would not approve, merely for the infrastructure that is not able to take much more traffic along the A4!
Robert Wallace	No mention of a revised Minerals policy No consideration of the economic and financial restraints on the Council
David Stubbs	I would say from the outset that for most ordinary households and residents, the prospect of reading, understanding and responding to planning regime documentation is not something which encourages transparency or accessibility. While fully appreciating the need for subject specific terminology and legal frame working, the knowledge that local opinion is therefore difficult both to assess and then to incorporate – and that once the consultation period closes, both the local authority and the many vested interests from the development community will then proceed to ‘interpret’ the local plan to their own desired outcomes does not inspire either great trust or great interest in engaging. Without either the specialist knowledge or ability to drill down deeply into the implications of the local plan review, I would restrict my comments to the following broad principles:- <ul style="list-style-type: none"> <li>· The recent economic climate, austerity and swingeing cutbacks in local services MUST be reflected in the ability of the local environment to contain and sustain large scale development.</li> <li>· The stated policy of central government to ‘build’ the country out of recession places undue pressure on local authorities who have not the infrastructure or resources to simply grant planning permission to fall in with national need and the local plan review MUST have the courage to strengthen West Berkshire council’s ability to retain proper control both of what is feasible and of the wishes of the local electorate.</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>· West Berkshire Council have showed some resolve in standing up to developers who refuse to submit applications which meet local requirements (such as the fractured approach being taken by the vying applications for Sandford). The plan review must acknowledge and strengthen this position.</li> <li>· Where delay to the desired number of new build starts each year is caused by the local authority properly rejecting applications which are not submitted in line with local planning guidance, the plan review must give the strength to resist both national government and developer pressure to grant 'catch up' approvals simply to hit targets!</li> <li>· The local plan MUST reflect that the local infrastructure, (road capacity and condition, bus services, reductions in waste collection, libraries, social services, NHS provision etc. etc.) is itself a constraint on the ability for new development to be 'sustainable'.</li> <li>· Where developers wish to make significant profit from their sites, the development must itself contribute proportionally to meeting the additional infrastructure needs that it will load onto the surrounding environment – and the plan must give the local authority the backbone to resist developers pleas that the proportion of social housing, school provision, brownfield remediation, play space or whatever will make the proposal unviable.</li> <li>· New developments MUST meet the requirements of policies such as the travel plan in preventing development which depends on vehicle transport and encouraging foot and cycle movement.</li> <li>· The plan review should encourage the priority use of infilling and brownfield sites – despite these not being the easy choice for developers - before permitting large scale greenfield development out of town with all the loss of countryside and traffic generation these entail.</li> <li>· The conversion of office and business premises into residential through permitted development should be resisted.</li> </ul>
Christopher Gent	Wherever possible it is important to respect existing settlement boundaries. Development should be focussed on rebuilding in existing development locations where possible.
William Graham	No. If WBC gets the future of housing and industry right, leisure, health and cultural facilities will naturally develop.
Julian Worth	Stronger links need to be made with the Minerals & Waste Local Plan as this covers important and potentially disruptive issues such as extraction, which impact significantly on the subjects considered in the Local Plan, notably landscape and water. In general, extraction in new areas should be opposed - alternative sources of aggregates are available, notably through the Theale rail depots, and despoilation of West Berks can be avoided by making greater use of these alternatives
David Lister	<p>The Sustainability Goals are ambitious and include objectives to 'mitigate.. climate change' and 'minimise demand for energy and other resources'. In Appendix 2 of the Local Plan the only policy related to climate change is CS16: Flooding which includes flood risk assessment.</p> <p>The Spatial Development Plan to 2036 must take into account the broader impacts of Climate Change and the change in energy availability in the next 20 years. National policy already recognizes the phasing out of fossil fuels in this time frame which is a result of fossil fuel depletion and carbon dioxide emissions.</p>

Respondent	Response
	<p>The development plan should have strategic objectives related to the generation of renewable energy (such as wind, solar, and biogas from anaerobic digestion) and objectives related to the energy efficiency of buildings. The policy should set out the goals of CO2 reduction from a defined starting point and the process under which progress against these goals is measured and enforced.</p>
<p><b>Landowners, site promoters and developers</b></p>	
<p>Barton Willmore for Sulham Estate</p>	<p>We consider that the review of the Local Plan should include the allocation of additional sites for residential development. In particular, Land at Hall Place Farm offers the opportunity to deliver up to 80 homes in the short to medium term in a sustainable location directly adjoining the Eastern Urban Area. The below comprises a summary of that which is contained in the suite of supporting documents which accompany these representations.</p> <p>The following demonstrate that the site is located within a sustainable location:</p> <p>The site is adjacent to the Eastern Urban Area which is categorised as an Urban Area within the settlement hierarchy and should be the focus for the majority of development. This site is within walking distance (800m) of Birch Copse Primary School. The site is also within walking distance (800m) of Little Heath Secondary School. The site is well located in terms of sustainable transport links with the 16, 17 and 33 buses all stopping within close proximity with regular bus services into central Reading. The site is approximately a 15 min walk from Tilehurst Village centre which has a number of local services including a Co-Operative supermarket. The site is located within the North Wessex Downs AONB. Accordingly, these representations are accompanied by a Landscape Capacity Assessment which concludes that the site has an overall low landscape sensitivity and has the potential to accommodate residential development. This is due to the influence of existing suburban fringe characteristics including the built form within the site and adjacent existing settlement edge. In addition, the ancient woodland to the north of the site also serves to shield views of the site from the wider AONB. The proposed layout has been designed with this capacity assessment in mind and looks to constrain development to that area which would not result in undue adverse effect to the AONB. From a heritage perspective, Hall Place Farmhouse which is contained within the site is Grade II listed. In addition, Kiln Cottage which lies to the south of the site is also Grade II listed. In order to consider the impact of these heritage assets on the potential for the development of the site a Heritage Preliminary Risk Appraisal has been prepared. This appraisal considers the site as three separate areas and concludes that whilst the area immediately surrounding Hall Place Farmhouse itself is highly sensitive, subject to sympathetic design, a proposal could be delivered which would not result in significant harm to the heritage asset. To the north of the site is an area of ancient woodland. The proposed layout incorporates a 15m buffer from this area in line with Natural England guidance. The highways technical note which accompanies these representations recommends that the main site access is taken from Little Heath Road. The preliminary site access arrangement complies with design standards in terms of the form of the junction, the carriageway and footway widths and the provision of visibility splays. As such, the report concludes that on this basis, "safe and suitable access to the site can be achieved for all people" in accordance with the requirements of the NPPF (paragraph 32).</p>

Respondent	Response
Barton Willmore for Graham Child	<p>We consider that the overall allocation of sites to meeting the housing need of the District should be carefully considered. We note that the current allocated sites are tasked with delivering the Core Strategy requirement, which is lower than that advised by the SHMA. Moreover, as we have stated we consider that the evidence underpinning the SHMA could be out of date and when tested during the Local Plan Examination, the housing requirement for the district may increase further. It is also noted that the Core Strategy extends only to 2026 and the emerging local plan will deliver housing to 2036. As we have noted above, whilst large strategic sites will be required to contribute heavily to the housing requirement, we advocate a mix of sites in all locations to contribute to the housing requirement of the District and in this regard we submit our clients site for consideration as an allocation within Pangbourne.</p> <p>Our client's site is situated to the south west of Pangbourne and straddles the development boundary. The site was included within the 2013 SHLAA and has more recently been submitted to the Council's most recent call for sites, for inclusion within the emerging HELAA. In 2013 the Council provided the following summary of the site within the SHLAA: "The potential impact on the natural beauty of the landscape would be the primary consideration...Landscape assessment required."</p> <p>In response to the above our client has commissioned a Landscape Appraisal and Opportunities and Constraints Plan, in order to provide more evidence on this issue. The Landscape Appraisal, prepared by Barton Willmore, concludes that:</p> <ul style="list-style-type: none"> <li>• Development of the site would not cause the loss of any valued landscape elements or features;</li> <li>• Development of the site would not cause the loss of any characteristic landscape elements or features;</li> <li>• Development of the site would not interrupt any key views; and</li> <li>• Development of the site would increase the level of vegetation surrounding the site and form a definitive western boundary to the settlement of</li> </ul> <p>In addition to the Landscape Appraisal, our client has also commissioned a Capacity Plan, prepared by Barton Willmore, which takes account of the findings from the Landscape Assessment. The Capacity Plan concludes that the site can accommodate 41 dwellings at a density of 19.9dph.</p> <p>Our client's site is also within single ownership and is therefore available to come forward immediately.</p> <p>We note that the Housing and Economic Land Availability Assessment (HELAA) is yet to be published and is expected Late 2018, in line with the next round of consultation (Regulation 18). We would advise the Council that our representations, specifically those regarding the landscape assessment of our client's land, are designed to assist the Council with the conclusions of the HELAA in this regard.</p> <p>Further detail concerning the site is contained in the attached documents.</p>
Bewley Homes	<ol style="list-style-type: none"> <li>1. A Policy that would specifically address the Borough's growing need for Housing Provision of Older People and specialist housing, such as C2 is necessary to ensure housing need for all is properly addressed.</li> <li>2. The Plan should consider the emerging changes to National Planning Policy Framework relating to 20% of its housing allocations being on sites which are less than 0.5 hectare. This would allow flexibility in the scale of housing sites that are focused in sustainable locations, delivered either as settlement extensions or allocations across the District.</li> <li>3. The emerging Local Plan should consider Woolhampton as a sustainable location for housing and allocate the site</li> </ol>

Respondent	Response
	<p>known as Land North of Bath Road site ref WOOL001 for housing. Previous assessments of the site made by West Berkshire through SHLAA have considered the site to have potential for residential development. The site is located on the west side of Woolhampton within the Parish of Midgham and sits adjacent to the current settlement boundary. The LPA considered its location was well related to the centre of the village and within walking distance of Midgham railway Station.</p> <p>Woolhampton as a service village provides a range of services which include two schools, (one being the local primary school), a church, village hall, village store and post office and a newsagent. The Coach and Horses is a pub and restaurant, whilst The Angel which is open seven days a week provides a restaurant and meeting and Wedding venue. The eastern side of the village also provides a BP petrol filling station, car wash and 24 hr kiosk shop. A garage, car servicing and repair business also operates in the village. Both Thatcham west of the village and Tadley to the south, offer further facilities within a 10 minute drive. It is also well linked to the M4, with travel times to Bristol and London within an hour. In terms of Public Transport links, the Council's Transport Policy Team have previously rated Woolhampton highly in terms of benefitting from good access to passenger transport services, enable existing residents and those from proposed developments to be able to choose modes of travel other than the car. These positive transport benefits include the easy access for Woolhampton residents to Midgham Railway Station via both walking and cycling. Midgham station provides hourly services to destinations including Thatcham, Newbury, Theale, Reading, London Paddington, Basingstoke, and the West Country with more frequent services provided to certain stations during peak times. In addition, Woolhampton is served by bus stops on both sides of the A4 in the village. The bus service is provided by premium Jet Black 1 operating a half hourly service along the A4 Bath Road, stopping in Woolhampton and Thatcham, running between Reading (east) and Newbury (west). Work on a new route of the National Cycle Network has been developed resulting in making improvements to cycle facilities on the A4. The National Cycle Network (NCN 422) once complete will run west to east along the A4/A329 corridor between central Newbury and Legoland, Windsor. The cycle network would deliver positive long-term benefits to residents of Woolhampton and its local economy. The recognised cycle facility along the A4 runs through the village, linking Newbury and Reading, improving linkages to key town centres and employment areas and will encourage the use of local sustainable transport networks. The first phase of the Route 422 Newbury to Ascot stretch of the NCN along Bath Road is already open, and work on the Reading Town centre Phase of the cross Berkshire route began earlier this</p>
Boyer Planning for Spitfire Bespoke Homes Ltd	<p>Our client's interest relates to land located to the south of Back Lane, Beenham, Berkshire. The site comprises 3.19 hectares and is suitable for housing development comprising approximately 40 dwellings in a sustainable central village location.</p> <p>The site contains a single detached bungalow with the rest of the site being agricultural land. The site is located in Flood Zone 1 and there are a small number of trees on the site which could be retained as part of any development proposal. The bungalow lies within the defined settlement boundary, although the remainder of the site lies outside the settlement boundary. The proximity to the settlement boundary however provides a suitable location for the sustainable growth of the village.</p>

Respondent	Response
	<p>Beenham is a linear village, located around 6 miles to the east of Newbury. Beenham has a fairly limited range of facilities although there is a bus service which runs through the village, and a more frequent service running along the A4 towards Reading and Newbury. The nearest railway station is Aldermaston, located approximately 2 miles to the south east. Beenham Primary School is situated on Back Lane, around 0.1 miles to the east of the existing site entrance. Discussions with the Primary School has identified that the village is unable to provide sufficient children to ensure the future sustainability of the school which may be at risk of closure without housing growth in the village. The village contains a public house (The Six Bells) although there is no village shop.</p> <p>To the south of the site is an area of Ancient Woodland and the Old Copse Site of Special Scientific Interest (SSSI). The site is also located within the North Wessex Area of Outstanding Natural Beauty (AONB). Any residential development on the site can be delivered without any detrimental impact on these areas.</p> <p>The site is an available, suitable and deliverable site, with no constraints to bringing the land forward for development at an early stage during the emerging plan period.</p> <p>As set out above, potential exists for residential development on land south of Back Lane to meet a local housing need in Beenham. Potential may also exist to incorporate an element of social infrastructure where it meets a local identified need. Such development would be sustainably and centrally located in the village and could assist in providing family homes to support the future sustainability of the Primary School and other social infrastructure. Without growth in Beenham, there is a risk that the Primary School may close.</p> <p>A Landscape Appraisal was undertaken by Pegasus Group in relation to the site which concluded that “the site is suitable to accommodate residential development. Mindful that it is located with the AONB environment and it will be necessary to demonstrate how the proposal not only conserves but enhances the environment. It can be demonstrated through a high quality residential scheme in combination with a comprehensive green infrastructure that significant opportunities exist to enhance the local environment not only in terms of scenic beauty and visual amenity but also in ecological and recreational terms” (Para 1.22).</p> <p>Vehicular access to the site is provided from Back Lane which can be delivered with appropriate visibility splays. Back Lane connects centrally to the village.</p> <p>The site is located entirely within Flood Zone 1 and there will be no adverse impact on floodplain flows or conveyance as a result of the development.</p> <p>The site lies close to a SSSI although the site itself is not considered to be of high biodiversity value. Subject to appropriate mitigation measures, the proposed development of the site can be achieved.</p> <p>The potential development of Land South of Beenham for residential development, potentially including social infrastructure improvements to meet local housing needs, offers substantial benefits for the village by providing family housing (including affordable housing) to meet local needs which will support the sustainable future of the village. The detailed analysis and commentary above demonstrates the suitability of the site for allocation within the new Local Plan. Further, the land is under the control of a quality house builder, who is in a position to bring forward the site for approximately 40 dwellings, including affordable housing and potentially some social infrastructure improvements. In addition, the site is deliverable in the immediate five year period and can provide a material number of homes in a</p>

Respondent	Response
	location where the short term need is pressing. For the reasons set out above the site should be allocated within the emerging Local Plan as a housing site allocation for approximately 40 dwellings and associated open space.
Carter Jonas for Hermitage Farms	<p>Given the overall level of housing and employment need, smaller sustainable settlements such as Hermitage can and should accommodate further housing and employment development to help sustain local services and facilities, to support the rural economy, and to improve issues of affordability and the plan should seek to allocate sites in the smaller sustainable settlements such as in Hermitage.</p> <p>Land around Hermitage as identified in the attached document is available now and is deliverable. There are no known constraints which would prevent development in this location. The sites are well related to the existing settlement of Hermitage, and would constitute sustainable development in accordance with the NPPF's presumption in favour of sustainable development.</p>
Deloitte LLP for Green Park Business Park	<p>We write on behalf of our client Green Park Reading No.1 LLP, who is the owner of Green Park business park. Green Park Reading No.1 LLP (GPR) is ultimately wholly owned by Mapletree Investments Pte Ltd (Mapletree).</p> <p>Since acquiring GPR in 2016, Mapletree has been reviewing the Park's potential, undertaking some asset management and considering future opportunities. Green Park is part located in the West Berkshire administrative area. GPR is keen to support the Council in making West Berkshire a sustainable place to live now and the future.</p> <p>Having reviewed the Scoping Report, GPR is supportive of the Councils broad objectives and wishes to comment on some of these to reflect its aspirations for Green Park.</p> <p>Green Park is a premier Business Park located in the Thames Valley area, serving the office needs of Reading, Wokingham and West Berkshire. It is situated on the border of three local authority areas, covering a 79 hectare land mass offering high quality office stock and associated amenities, located around a central body of water. The Business Park is accessed from the A33 relief road, and is located south of Reading town centre.</p> <p>At present the Park provides around 1.4 million square feet of office space to over 60 companies (excluding those companies located in Regus, i2 Office and Grow@ Green Park), including leading IT, technology and pharmaceutical business sectors. A range of business accommodation is provided, ranging from larger corporate headquarter floorplates to smaller business start-up areas.</p> <p>Green Park is well served by public transport with frequent bus service access to Reading Town Centre and the Madejski Stadium and will accommodate Green Park railway station, anticipated to open in the next 3 – 5 years. Green Park Village, positioned north and west of the business park, provides for a wider residential setting with associated mixed use development.</p> <p>Evolution of Green Park (1985 to Present Day)</p> <p>Green Park was originally identified in the Berkshire Structure Plan in 1985 as a location for 40ha of general employment development including light and general industry and warehousing. Outline permission restricted office use quantum to a maximum of 50% with a required a minimum quantum of light industry (B1c) and general industry and warehousing (B2&amp;8). Between the period 1995 to 2000, the original Outline Permission was later varied to allow for unrestricted B1 office use.</p>

Respondent	Response
	<p>Development of the site since 1985 has largely followed the principles set by the outline application as well as principles set by The Prudential Assurance Company Limited, who appointed Fosters &amp; Partners to create a non-statutory Masterplan in 1998.</p> <p>In 2013, Aukett Swanke were asked by Oxford Properties to undertake a Masterplan refresh, principally in relation to the undeveloped land parcels. The Masterplan refresh was worked in close collaboration with West Berkshire and the adjoining Reading and Wokingham Councils. This has also been cognisant of the wider development aspirations, including Green Park Village and other proposals in the area.</p>
Hallam Land Management	<p>In summary therefore;</p> <ul style="list-style-type: none"> <li>• we are advocating a new approach to planning within this part of Berkshire which is focused on delivering housing across the Housing Market Area regardless of authority boundaries, based upon the principles of sound, strategic, sustainable planning.</li> <li>• we support the further consideration of the Grazeley Garden Settlement and maintain that this proposal provides a genuine and credible response to the future housing and employment needs of West Berkshire.</li> </ul>
Gladman Developments Ltd	<p>It is vital that the policies of the Plan are sufficiently flexible to respond to rapid change. It is therefore important that an effective approach to monitoring is put in place. Suitable provisions should also be included within relevant policies to ensure that a positive response will be taken through decision making when required to ensure that a robust supply of land can be maintained throughout the plan period.</p> <p>These representations provide a range of general observations, together with specific responses to the questions that have been posed within the Local Plan Review Scoping Report. The general observations cover issues relating to: National Policy, Housing White Paper and Emerging Revisions to National Policy, Legal Compliance, Duty to Cooperate, Sustainability Appraisal, Housing and Economic Development Needs and are set out in the attached document.</p> <p>Gladman welcomes the publication of the West Berkshire Local Plan Review to 2036 Scoping Report and consider that this represents an opportunity to comprehensively update the Local Plan. The Review will need to be established against a robust assessment of housing and economic development needs and then identify the additional land that is required to meet those needs in full over the extended plan period to 2036. In this regard, Gladman endorse the following sites for inclusion within the Local Plan:</p> <ul style="list-style-type: none"> <li>• Land off Andover Road, Newbury</li> </ul> <p>It is essential that sufficient flexibility is provided within the Local Plan to enable a rolling 5 year housing land supply to be maintained in a manner that is responsive to rapid change. In addition, the Local Plan must include an approach that positively supports economic development and include policies that are fully responsive to associated needs that may arise that have not necessarily been anticipated by the Plan.</p> <p>Gladman looks forward to being provided the opportunity to comment further on the West Berkshire Local Plan Review to</p>

Respondent	Response
	2036 in due course. Effective and on-going engagement with all interested parties, including the development industry, will ultimately ensure the production of a Plan that is deliverable and successful in achieving its vision and aims.
Nexus Planning for Croudace Homes	<p>As set out above, Croudace Homes considers that a full and comprehensive review of the Local Plan is required in order to ensure that full objectively assessed development needs are planned for within the District as required by the Framework at Paragraph 47. In that regard, we welcome the proposed scope of the review as set out, but consider that regard should be had to emerging changes to the Framework. In seeking to allocate housing we consider that the existing spatial strategy, which places Thatcham in the top tier of the Settlement Hierarchy, remains robust. However, Thatcham was deemed to require a period of consultation under the adopted Core Strategy and was duly allocated for modest levels of growth. That decision was taken nearly 10 years ago and since that time, Newbury and the Eastern Urban Area have seen much greater levels of growth. In accordance with the comments of the Core Strategy Inspector, Thatcham must be considered again for growth this time around. Croudace Homes does not object to the principle of a new settlement at Grazely, but notes that the land would cross Local Authority boundaries and would require extensive cross boundary working in order to be developed. A scheme of this size could only deliver towards the back end of the plan period at best. As such, sustainable options to deliver housing at the existing strategic settlements must first be explored. Against that background, it has been demonstrated through the decision by the Secretary of State that there are technical matters precluding development of at least 225 dwellings on land at Henwick Park, Thatcham. The land is available now, offers a suitable location for development now, and is achievable with development coming forwards within the first five years of the plan period. Thus the site is therefore deliverable within the meaning set out at Footnote 11 of the Framework.</p> <p>Croudace Homes Ltd is actively promoting land at Henwick Park, Thatcham, also known as 'Land North of Bowling Green Road' for inclusion in the emerging Local Plan as a strategic housing allocation. The Henwick Park site comprises 24.5ha of agricultural land and is situated approximately 1.6km to the north of Thatcham Town Centre.</p> <p>The Council will be aware that in July 2015 Nexus Planning, on behalf of Croudace Homes, submitted an Outline Planning application (ref. 15/01949/OUTMAJ) for up to 265 homes on the Henwick Park site (later amended to 225 homes). West Berkshire Council, contending that it has an up-to-date Core Strategy and that it is able to demonstrate a five year supply of deliverable housing sites, refused the application.</p> <p>The application was duly heard by public inquiry (conjoined with the scheme east of Thatcham at 'Siege Cross'). Following the Inquiry which concluded in December 2016, inspector John Chase recommended that both appeals be allowed. However, the applications were called in for decision by the Secretary of State (Sajid Javid) and in a decision letter dated 27th July 2017, the secretary of State disagreed with the inspector's recommendation and refused permission for both schemes.</p> <p>In his decision letters the Secretary of State outlined that following the close of the original inquiry he had received</p>

Respondent	Response
	<p>representations from the Council, including information on an updated five-year housing land supply. The Housing Site Allocations DPD (HSA DPD) had also been formally adopted by the council in May 2017 following the close of the Inquiry.</p> <p>In dismissing the appeals he found that the Council could demonstrate a five-year supply of deliverable housing sites at that time. As such, there were no material considerations sufficient to indicate that the proposals should be determined other than in accordance with the development plan. Significantly however, he found no technical matters that would preclude development at the site including matters such as landscape, transport, ecology or flood risk.</p>
Nexus Planning for Pangbourne Beaver Properties Ltd	
Origin3 Ltd for Sandtrend Ltd	<p><b>Housing Need</b> This section considers the Western Berkshire Housing Market Area (HMA), how forecasted housing needs may need to be met over the plan period and considers the work undertaken by West Berkshire Council in coordination with the other HMA authorities within the Strategic Housing Market Assessment (SHMA) to calculate the objectively assessed housing need (OAHN).</p> <p><b>Duty to Cooperate and Housing Market Areas</b> The legal requirement of the local plan preparation process, the Duty to Cooperate is set out at Section 110 of the Localism Act 2011 and reinforced by national policy at NPPF paragraphs 178 to 181. It requires local planning authorities to cooperate on planning issues that cross administrative boundaries, particularly those strategic priorities set out at NPPF paragraph 156, one of which is the number of homes and jobs needed in an area.</p> <p>NPPF paragraph 159 strongly recommends that where the HMA extends over administrative boundaries, local planning authorities should work with neighbouring authorities to produce a Strategic Housing Market Assessment (SHMA) to assess their full housing needs. The coordination of a SHMA to comprehensively identify the needs of the four authorities within the Western Berkshire HMA is supported.</p> <p>West Berkshire Council should ensure that flexibility is maintained in order to accommodate any unmet housing need arising from within the HMA itself. This is very likely to arise from Reading, in consideration of its tightly drawn administrative boundaries, and close functional relationship with West Berkshire.</p> <p>As set out in Section 2 above, the four local authorities within the HMA have coordinated a non- statutory Spatial Planning Framework (December 2016) which strategically sets out how housing requirements could be met over the period to 2036. This is a good starting point for complying with the Duty to Co-operate, however this must continue through into the respective constituent Local Plans and flexibility must be incorporated in order to meet unmet needs arising due to unforeseen circumstances.</p> <p>At the time of writing, the Spatial Planning Framework envisaged that the four constituent plans would progress near simultaneously which would be advantageous in terms of being responsive to unmet needs arising.</p>

Respondent	Response
	<p>Reading Borough Council are working on producing a new Local Plan for the period up to 2036, having consulted on a Pre-Submission Draft Local Plan in January 2018. We acknowledge that the four authorities have signed a Memorandum of Understanding (MoU) which agrees that Reading cannot accommodate its entire OAHN within its boundaries. We also note that formal requests have been made to Wokingham Borough and West Berkshire to accommodate unmet need. The scale of the shortfall is yet to be agreed but is likely to be within the range of 500 – 1,000 dwellings over the period 2013-2036 and will arise in the second half of the plan period.</p> <p>It is understood that Reading believes that Wokingham Borough and West Berkshire are the most appropriate locations to meet any unmet housing needs arising from Reading, not South Oxfordshire District to the north because of underlying congestion issues<sup>3</sup>.</p> <p>Wokingham Borough Council has consulted on its Issues and Options document in August 2016 with Preferred Options Consultation likely to take place during the course of 2018. Bracknell Forest Borough Council has recently concluded the consultation of its Draft Local Plan in March 2018. It is understood that both Councils have coordinated a formal review of their land that lies within the Metropolitan Green Belt.</p> <p>It is considered that all of Reading Borough, Wokingham Borough and Bracknell Forest Borough are further advanced in their local plan preparation than West Berkshire. This will enable the West Berkshire Local Plan Review to be responsive to meeting any unmet needs arising through the various processes.</p> <p>We support the Council's commitment to meet the full OAHN for the Western Berkshire HMA within the HMA itself. It is however important that the local authorities within the HMA make allowances and maintain flexibility to accommodate any unmet housing needs arising from neighbouring HMAs. The potential considerations of each with respect Newbury and West Berkshire are listed below:</p> <ul style="list-style-type: none"> <li>• Swindon HMA – this HMA is newly formed following the recent Swindon and Wiltshire Joint Spatial Framework The Swindon / M4 Corridor Functional Economic Market Area (FEMA) has a strong eastward focus into West Berkshire and the Thames Valley. It may be more logical and more sustainable for any unmet need arising from Swindon and the wider HMA to be met within West Berkshire which because of the M4 holds a closer functional relationship with the city than more southerly parts of Wiltshire;</li> <li>• Oxfordshire HMA – this HMA is centred on Oxford and similarly to Reading, because of tightly drawing administrative boundaries, requires unmet needs arising from the city to be met in neighbouring The Green Belt around Oxford is a factor alongside the North Wessex Downs AONB in the southern extremes of the HMA. The A34 provides strong connections and a functional relationship between Oxford and Newbury;</li> <li>• Eastern Berkshire and South Bucks HMA – this HMA is heavily constrained by the Metropolitan Green Belt and is considered likely that needs being met outside of the HMA will need to be fully explored, in order to comply with national policy;</li> <li>• Basingstoke and Deane HMA – this HMA holds a close functional relationship with West Berkshire and particularly The northernmost extents of the HMA lie within the Newbury Travel to Work Area (TTWA) because of the A34 and the A339.</li> </ul>

Respondent	Response
	<p>National policy affords Green Belt land the highest protection and the draft revised NPPF considers that 'before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development, which will take into account whether the strategy, amongst other items, has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.</p> <p><b>Demographic Analysis</b></p> <p>It is acknowledged that the starting point for the calculation of OAHN is the latest official household projections which are the CLG 2014-based Household Projections which are, in turn, underpinned by the 2014 based sub-national population projections (SNPP), and the Government's emerging Standardised OAHN methodology.</p> <p>It is noted that for West Berkshire the CLG household projections show a notably lower increase in number of households over the period 2013-2036 (13.7%) when compared with the wider HMA (average 18.8%). The SNPP show a notably lower increase in population (7.1%) when compared with the wider HMA (average 13.2%). Both projections for West Berkshire and the difference between those of the HMA are not fully explained within the SHMA work.</p> <p>It is also noted that the SHMA opts to work on the basis of the rebased SNPP and 10 year migration (without a UPC adjustment). It is questioned why the SHMA does not adequately factor in an allowance for un-attributable population change (UPC) given the SNPP shows that the population of West Berkshire is expected to grow by circa 7.1% over the plan period, below the average for the HMA (13.2%). It would be very prudent to make an adjustment, specifically for West Berkshire, for population growth closer to the average of the HMA.</p> <p><b>Household Formation Rates</b></p> <p>It is understood that the SHMA then seeks to make an adjustment in consideration of household formation rates for younger age groups, addressing evidence of suppression in the historical trends and in line with national policy supporting an improved ability of younger households to form. These issues are particularly prevalent in West Berkshire and Bracknell Forest where the downward trend of household formation in the 25-34 year old age bracket is projected to continue.</p> <p>The OAHN is derived on the expectation that we will continue to experience a reduction in the ability of 25-34 year olds to form households. It is critical that a meaningful uplift is applied, particularly for West Berkshire and Bracknell Forest. It is understood that an uplift of circa 10-12% is applied to West Berkshire and 11-13% for Bracknell Forest, whilst Reading is afforded an uplift of 6-8% and Wokingham 7-8%.</p> <p>It is questioned whether the uplift afforded to West Berkshire and Bracknell Forest is sufficient enough to halt the current downward trend and meaningfully improve headship rates for younger households within these authority areas.</p> <p><b>Supporting Economic Growth</b></p> <p>The principle of the SHMA considering aspirational growth in employment in order to consider whether higher housing provision over and above the demographic projections is required, is supported. The HMA is part of the Thames Valley Berkshire Local Enterprise Partnership (LEP) and also incorporates the rest of Berkshire. The LEP considers that the sub-regional economy is the most productive in the UK outside of London.</p>

Respondent	Response
	<p>The concept of adopting the more positive of the two econometric forecasts (Cambridge Econometrics) for West Berkshire is generally supported, albeit this does not take the economic-led need scenario above the demographic-led need scenario like it does for the other HMA authorities.</p> <p>The economic attributes and self-sufficiency of West Berkshire are being overlooked by the SHMA. West Berkshire has a diverse business profile, being dominated by small and micro-enterprises but also being home to some of the LEP's major corporates, including at Newbury. LEP evidence points to West Berkshire being the most self-contained of the six authorities within the LEP, even more so than Reading. This is reflected in Newbury being recognised as having its own TTWA which also extends into north-eastern Wiltshire towards Swindon and northern Hampshire, whereas the Reading TTWA encompasses most of Wokingham and Bracknell Forest. Furthermore, the LEP report into the Functional Economic Market Areas (FEMA) of Berkshire recognise that West Berkshire is its own FEMA, focused on the key centre Newbury, which is characterised by having a relatively self-contained TTWA and tends to operate within a westward facing commercial property market (towards Swindon). This all points to the capacity for West Berkshire and especially Newbury to accommodate greater growth, taking advantage of good self-containment, thereby reducing commuting as far as is possible. The ongoing electrification of the railway between Reading and Newbury will only serve to increase economic prosperity in West Berkshire.</p> <p>On the basis of the above, it is considered that a greater adjustment for econometrics should be factored in to take the economic-led projection for West Berkshire above the demographic-led projection, in line with the rest of the HMA.</p> <p><b>Market Signals</b></p> <p>The notion of upwards adjustment on the basis of market signals is supported. In respect of West Berkshire and the wider Western Berkshire HMA, the following conclusions can be drawn in relation to an adjustment to account for market signals as noted by the Planning Practice Guidance (PPG):</p> <ul style="list-style-type: none"> <li>• Land Prices – anecdotal evidence suggests that there is strong competition for land that often landowner expectation on value of return is unreasonably high and can often compromise otherwise viable. Despite being marginally below the regional average, the post-permission residential land value in West Berkshire remains substantially above the national average (circa 60%) and points to a prevalent issue (Table 49, Paragraph 6.6, Page 80, OAN Sensitivity Testing – Western Berkshire Housing Market Area (March 2018))</li> <li>• House Prices – the evidence suggests that house prices are growing across the HMA and notably more than the regional average for the South-East. House prices are currently growing fastest in Reading, West Berkshire and Wokingham and slower in Bracknell Forest, perhaps reflecting the availability of employment opportunities and the subsequent commuting patterns that it is notable that West Berkshire has demonstrated similar house price growth comparative to the rest of the HMA despite being further away from London and the tendency to commute into the capital therefore being less (Table 50, Paragraph 6.8, Page 80, OAN Sensitivity Testing);</li> <li>• Rents – the evidence suggests that rents across the HMA have grown relatively uniformly similar to the regional average but markedly above the national average (Table 52, Paragraph 6.15, Page 82, OAN Sensitivity Testing)</li> <li>• Affordability – the evidence suggests that affordability is generally worsening across the HMA, Bracknell Forest and Wokingham remain the least affordable authority areas and this reflects proximity to London but West</li> </ul>

Respondent	Response
	<p>Berkshire remains less affordable than the regional average for both lower quartile and median work-place and residence based earnings and Reading for lower quartile work-place and residence based</p> <ul style="list-style-type: none"> <li>• Rate of Development – the evidence suggests that throughout recent years, average development rates across the HMA have generally remained lower than the respective identified annualised requirements resulting in a marked under-delivery.</li> <li>• Overcrowding – in our experience, overcrowding is compounded by worsening affordability, access to mortgage finance and an under-supply of housing which all lead to a concealed need, perhaps best demonstrated by young people being forced to live with their parents for</li> </ul> <p>Generally, all of the market signals within West Berkshire and the wider HMA point to a lack of housing supply in relation to the number of people who desire to form a household. The ability of an upward adjustment for market signals to comprehensively address an under-supply of housing is questioned. Further clarity on how the household projections take into account unmet need from previous plan periods would also be helpful.</p> <p>In consideration of the prevailing market signals across the whole of the HMA and the modest variance that is evidenced, it is questioned why the SHMA concludes that an uplift of only 10% is considered appropriate in West Berkshire (the SHMA recommends 10-15%), whereas for Wokingham, an uplift of 20% is recommended. In real terms this equates to an uplift of 39 dwellings per annum for West Berkshire and an uplift of 116 dwellings per annum, nearly three times as many as West Berkshire which is disproportionate in consideration of the similar issues faced by the two authorities.</p> <p>Due consideration should be given to the Government's standardised methodology for adjusting for market signals which is linked to affordability ratios and indicates that an uplift of 36% across the HMA, relative to the demographic baseline of household growth per annum, should be applied. This ranges from 28% for Reading, 32% for Bracknell Forest, 37% for West Berkshire and 45% for Wokingham. It is therefore questioned why the SHMA is seeking to apply a far lower market signals adjustment, especially in respect of West Berkshire.</p> <p><b>Affordable Housing Need</b></p> <p>The evidence suggests that there are inherent affordability issues across the entire HMA. The net affordable housing need for West Berkshire is calculated at 180 dwellings per annum but this relies upon a high proportion of total need (72%) being satisfied through relets of current stock which is an unreliable factor. The SHMA estimates that the net affordable housing need across the HMA is 1,328 dwellings per annum, taking into consideration current need, newly forming households, existing households falling into need and supply for existing stock. In consideration of the suggested OAHN of 2,790 dwellings per annum for the HMA, it is difficult to see how the OAHN is sufficiently high enough to make a positive contribution to improving issues of wide-spread issues of affordability and provide more affordable housing.</p> <p><b>Significant Boost to Supply of Housing across West Berkshire?</b></p> <p>NPPF Paragraphs 47 through 55 set out the aspiration to 'boost significantly' the supply of housing. This suggested significant boost is in order to combat and eventually remedy a historic and chronic under-supply of housing across the United Kingdom. This should not factor in a response to demographic changes which would have had to have been planned for in any event i.e. the significant boost should be considered as a policy and supply factor after forecasted population projections have been established.</p>

Respondent	Response
	<p>The West Berkshire Council Core Strategy (July 2012) set a housing requirement of 10,500 net additional dwellings over the period 2006 to 2026, this equates to a net additional dwelling requirement of 525 dwellings per annum. The West Berkshire Local Plan Annual Monitoring Report (AMR) states that 5,497 dwellings were delivered over the period 2006-2017, equating to an average delivery of 500 dwellings per annum which represents under-delivery of around 5% over the first eleven year period of the plan.</p> <p>The SHMA suggests that the OAHN for West Berkshire over the plan period 2013-2036 should be 600 dwellings per annum. On the assumption that a similar under-delivery is recorded in the next plan period then this would equate to the delivery of around 570 dwellings per annum. Can 570 dwellings per annum be considered to be a significant boost in the supply of housing from the 500 dwellings per annum historically delivered? It is a modest 14% increase. National and local policy objectives, supply capacity and cross-boundary unmet need arising should all be considered following the calculation of the OAHN to determine an appropriate overall housing provision target.</p> <p>To summarise the above, we ask the Council to consider the following headlines:</p> <ul style="list-style-type: none"> <li>• The coordination of a SHMA to comprehensively identify the needs of the four authorities within the Western Berkshire HMA is supported;</li> <li>• West Berkshire will need to account for some of Reading's unmet housing need following the signed Memorandum of Understanding;</li> <li>• We support the Council's intentions to arrive at a suitable OAHN beyond simply applying the Government's emerging standardised methodology however urge the Council to ensure that is robust enough to sufficiently account for under delivery to date, Reading's unmet need and account for local affordable housing</li> </ul> <p>Land West of Wantage Road, Donnington, Newbury Our client's site at 'Land to the west of Wantage Road', Shaw-cum-Donnington is located directly north of Newbury. The site is located within the West of Berkshire Spatial Framework Plan Newbury 'Area of Search'. Development prospects in this location should therefore be tested and explored through the LPR. Details of site included in attached document Conclusion As set out throughout these representations, we support the Council's intentions to undertake a comprehensive Review of the Local Plan providing that through this process the Council arrive at a suitable OAHN (and subsequent housing requirement for the new plan period) and put in place a strategy to deliver new homes in sustainable locations, including non-strategic housing allocations. At a minimum, the LPR will need to satisfy the tests of soundness set out in the NPPF paragraph 182 to ensure the plan is positively prepares, justified, effective and consistent with national policy. In this instance, due to the timing of the LPR, particular regard will need to given to consistency with national policy in the context of emerging national policy. Most notably updates to the NPPF expected to be formally put into place later this year.</p>

Respondent	Response
	<p>As a starting point, the Council should test and explore strategic and non-strategic development opportunities within the Areas of Search identified in the West of Berkshire Spatial Framework Plan which was published by the four authorities within the Western HMA and therefore represents a cohesive, joined approach.</p> <p>As part of this, our client's site at Land West of Wantage Road, Donnington, Newbury, presents a suitable, sustainable location to direct new development. The site has the capacity to deliver up to 200 dwellings in the immediate short term as a standalone application or alternatively could form part of a wider strategic option to the north of Newbury, depending on the Council's aspirations.</p>
Pegasus Planning Group Ltd for Donnington New Homes	<p>As raised in the previous response, the provision of accessible homes for older people should be addressed as part of the review. This may be as part of Policy CS4: Housing Type and Mix, or as part of a new, standalone policy. Tourism should also be addressed as part of the review, and a specific policy should be created for it.</p> <p>The provision of community uses as part of new development should also be examined, and a new policy created to address it.</p>
Pegasus Planning Group Ltd for Donnington New Homes	No – there are not any other policy issues that should be considered as part of the review of the Local Plan.
Pro Vision for Audley Group	<p>Following on from our comments regarding the draft objectives, the revised Local Plan should positively address meeting the objectively assessed need for specialist accommodation, including accommodation and care to meet the needs of an ageing population.</p> <p>It should, however, be mindful that simplistic responses to the challenge of planning for an ageing population are possible with an inadequate policy position. For example, it may be possible to satisfy the planning requirement for 'specialist accommodation' for the elderly by simply providing age-restricted conventional accommodation. The addition of an age-restriction, such as over 55's, should not be considered an appropriate long- term solution to the objective of helping people to live independently for as long as possible. Rather, the revised Local Plan should actively support genuinely specialised accommodation models that provide for the changing needs of the elderly overtime and therefore provide a secure and comfortable environment without the prospect of further essential moves in later years. The revised Local Plan should explicitly recognise and support the full spectrum of specialist elderly care models, including Use Class C2 which helps people to remain living independently.</p> <p>Positively supporting elderly independent living models will also have a benefit for the wider challenge of meeting overall housing requirements by freeing-up under-occupied market housing (see reference to the NPPG below).</p> <p>Positive policy support for C2 provision would also be justified in the context of recent research that identifies that this specialist accommodation helps to reduce the burden on health services. For example, key findings of a recent study (Collaborative Research between Aston Research Centre for Healthy Ageing (ARCHA) and the ExtraCare Charitable Trust, Aston University, The Final Report, April 2015) included:</p>

Respondent	Response
	<ol style="list-style-type: none"> <li>1. The ExtraCare Charitable Trust model can result in significant savings for NHS budgets – over a 12 month period costs total NHS costs (including GP visits, practice and district nurse visits and hospital appointments and admissions) reduce by 38% for ExtraCare residents who were in the sample across the period.</li> <li>2. NHS costs for ‘frail’ residents had reduced by 51.5% after 12 months.</li> <li>3. The ExtraCare model is associated with a significant reduction in the duration of unplanned hospital stays, from an average of 8-14 days to 1-2 days.</li> </ol> <p>The adopted Core Strategy is very indistinct and generalist in terms of addressing this key issue of planning for the challenges of the ageing population. Part of the Spatial Vision states:  “The District will be coping well with the challenges of an ageing population, partly by retaining larger numbers of younger people and families (through the provision of an appropriate range of housing in terms of size and tenure), who will help support the older communities but also through increased investment in accommodation for the elderly”.(our emphasis).</p> <p>Policy CS4 (Housing type and mix) states that:  “Residential development will be expected to contribute to the delivery of an appropriate mix of dwelling types and sizes to meet the housing needs of all sectors of the community, including those with specialist requirements”. (Our emphasis)</p> <p>The supporting text goes on to explain that:  “Housing provision must support the needs of the whole community, include the provision of both market and affordable housing, and reflect the needs of specific groups such as families with children, single person households, the elderly, and those households with special needs.” (Our emphasis).</p> <p>There are, however, no specific or positively worded site allocation or identification policies about meeting the needs for the elderly, nor addressing the different formats in which this need can and is being met by Audley and others. Given the widely recognized issue that the country, including West Berkshire, has a rapidly growing elderly population, the revised Local Plan should include specific policies to positively meet this need.</p> <p>Addressing the needs of the elderly is recognised in national policy (as we have noted in response to Question 2). Supporting the NPPF, the National Planning Policy Guidance (NPPG) specifically addresses “how local authorities should deal with housing for older people” (para 037):  “Older people have a wide range of different housing needs, ranging from suitable and appropriately located market housing through to residential institutions (Use Class C2). Local planning authorities should count housing provided for older people, including residential institutions in Use Class C2, against their housing requirement. The approach taken, which may include site allocations, should be clearly set out in the Local Plan”.</p> <p>Regarding development management decisions, it goes on to state that:  “evidence that development proposals for accessible and manageable homes specifically for older people will free up under-occupied local housing for other population groups is likely to demonstrate a market need that supports the approval of such homes”.</p> <p>In terms of assessing the need, the NPPG (para 021) states that:</p>

Respondent	Response
	<p>“The need to provide housing for older people is critical given the projected increase in the number of households aged 65 and over accounts for over half of the new households (Department for Communities and Local Government Household Projections 2013)”.</p> <p>“Plan makers will need to consider the size, location and quality of dwellings needed in the future for older people in order to allow them to live independently and safely for as long as possible, or to move to a more sustainable accommodation if they wish”.</p> <p>“Supporting independent living can help to reduce the costs to health and social services, and providing more options for older people to move could also free up houses that area under occupied”.</p> <p>“The future need for specialist accommodation for older people broken down by tenure and type (eg sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2)”.</p> <p>As well as the NPPG, the review of the Local Plan will need to take into account the latest Strategic Housing Market Assessment (SHMA). The latest version of the SHMA addresses the provision ‘Registered Care Housing (C2 class)’ at section 9. The picture across the SHMA area is that there is expected to be a shortfall in accommodation of 3,462 bed spaces looking ahead to 2036, equating to 151 bed spaces per annum.</p> <p>For West Berkshire alone, the shortfall is calculated as 599 bed spaces<sup>11</sup>. In Audley’s experience, and as reflected in the Committee Report publication by HCLG – ‘Housing for Older people’ (Paragraph 120), the vast majority of residents within an Audley care community come from the local area. The provision of additional specialist accommodation for the elderly within West Berkshire would make a direct and tangible contribution to meeting local need and the Local Plan should encourage this.</p> <p>The SHMA (paragraph 9.43) states that these figures are very relevant</p> <p>“if the Councils intend to include residential institutions which do not meet the definition of a dwelling in their assessment of 5-year housing land supply as it will be necessary to include figures on both the need and the supply side of the equation”.</p> <p>As noted above, the NPPG has clarified that LPAs should include Use Class C2 against their housing requirements. The SHMA (paragraph 9.44) also notes that:</p> <p>“Although residential institutions which do not meet the definition of a dwelling cover more than just elderly accommodation, the elderly age groups are the only ones expected to see a notable increase in its population”.</p> <p>In principle, Audley will therefore support an explicit policy (or policies) in the revised Local Plan, which is consistent with the NPPF and NPPG, to support and guide meeting the needs for an ageing population which is above the national average in West Berkshire. Without a positive policy position, this key issue for the district is likely to get worse, which would have a significantly detrimental consequence for meeting overall housing needs and social well-being within the district.</p> <p>An example of an LPA that has already made an attempt to positively meet this need is North Somerset District Council. Its Sites and Policies Plan Part 1 (adopted in July 2016) includes policy DM40 and DM4112,</p>

Respondent	Response
	<p>Policy DM40 states that the LPA will “support retirement accommodation and supported independent living for older and vulnerable people” subject to specified criteria. It also acknowledges that these uses can “blur the edges of C2 and C3 use”. Policy DM41 states that the LPA will support “extensions that would result in extra capacity to new or residential care or nursing homes within Class C2” subject to specified criteria.</p> <p>It is important, however, that Local Plan policies explicitly support care communities which, as noted under our response to Question 2, are now widely recognised as being a more effective response to the elderly care challenge than traditional nursing and care homes.</p>
Pro Vision for Rivar Ltd	<p>Our response to Question 1,above, is relevant to Consultation Question 7 of the SA (SEA) Scoping Report, as set out below:</p> <p>The SA Objectives reflect the economic, social and environmental dimensions to sustainable development defined in paragraph 7 of the NPPF and carried forward in the proposed revisions to the NPPF. However, Table 4 of the SA (SEA) Scoping Report does not provide an accurate assessment of the compatibility of the SA Objectives and the Local Plan Review Objectives.</p> <p>In its current form, Local Plan Review Objective A Climate Change should be shown as working against SA Objectives 1and 10. Minimising demand for energy is likely to restrict housing development and economic growth.</p> <p>Local Plan Review Objective B Housing does not strongly support SA Objective 1. The Local Plan Review Objective should be focussed on meeting the identified local need for housing to ensure compatibility with the SA Objective.</p> <p>Local Plan Review Objective D Economy does not strongly support SA Objective 10, as the SA Objective requires identified needs to be met, whilst the Local Plan Review Objective makes no reference to the assessment of need.</p> <p>Local Plan Review Objective E Town Centres does not strongly support SA Objective 10, as if a diverse mix of uses (including housing, offices and live / work) are not promoted in town centres, vacancy rates are likely to increase.</p>
Joy Schlaudraff	<p>Yes. There should be a specific policy that identifies semi-rural sites, or potential semi-rural sites. These are often the most pleasant and positive places to live, due to their proximity to towns, large villages, and urban areas, but very hard to get allocated for development.</p> <p>These would be developed by the private small developer, which give the best quality developments with attention to detail.</p> <p>Yet they are also most conservant of green space, as they secure the future of an area, but use land effectively.</p> <p>Paragraph 55 of the nppf should be taken as it is meant to be interpreted for mixed use schemes or small major housing developments, not just single dwellings.</p> <p>Where there is development with ANY kind of standard community benefit (community hall, school, meeting places, or anything of public benefit – these applications should be allowed). It should not have to be a specific scheme, this or that, just proven public benefit should be enough, along with the quality of a development, and its respect to councils standards of quality relevant to the particular location.</p> <p>Paragraph 95 of the draft nppf should also be given great weight.</p>

Respondent	Response
	As long as buildings fit in with the character and appearance of a place, and are suitable in their use and design, that should be sufficient.
Turley for Berfeld Limited	<p>We consider that the following evidence and policy documents should be considered as part of the Local Plan review to inform and directly influence future policies.</p> <p>West Berkshire Strategic Flood Risk Assessment: Climate change is increasing flood risk to the planning authorities and exposing their housing stock to increased levels of flood risk e.g. 30,000 homes are already at risk in West Berkshire and over 6,000 in Reading and more in Wokingham. New developments that seek to reduce flood risk to existing communities at risk of flooding should be encouraged.</p> <p>It is also important to recognise that flood risk management occurs across catchment wide spatial areas and there may be a need for cross-boundary collaboration between local authorities to bring forward development that manages and reduces flood risk.</p> <p>West Berkshire Local Flood Risk Management Strategy (LFRMS): Increase the ability for West Berkshire Council to rapidly deploy a scheme to alleviate flooding and prioritise sites that bring forward flood risk management.</p> <p>West Berkshire District Council Level 1 SFRA: It strives to ensure a positive reduction in flood risk through future development and regeneration as well as reduce the risk of flooding to existing development.</p>
Turley for Commercial Estates Group	<p>As explained, we consider that there is a requirement for a number of sites to be progressed through being allocated within the Local Plan Review, which will provide extensive new infrastructure and ensure that housing need within the District can be effectively addressed. Newbury, being the largest and most well-served settlement in West Berkshire, is considered to represent one of the most sustainable locations for development. The Local Plan Review should therefore consider the potential for new development at the town.</p> <p>We consider that our land interests at North Newbury can make a significant contribution to the supply of new dwellings in West Berkshire. The proposal is to provide an extension to the site 'Land adjacent to Hilltop, Oxford Road, Donnington, Newbury' which benefits from outline planning permission (Pins Ref: APP/W0340/W/16/3143214) for; "401 dwellings on 11.35 hectares of land. A 400 sq.m. local centre (Use Classes A1/A2/D1/D2 – no more than 200 sq.m. of A1) on 0.29 hectares of land, a one form entry primary school site on 1.7 hectares of land, public open space, landscaping and associated highway works."</p> <p>It is considered that an extension to this site would allow for the provision of new dwellings, as well as areas of green infrastructure, public open space and community facilities and could help to assist with the movement of traffic in and around this part of Newbury.</p>
Turley for North East Thatcham Consortium	<p>The Consortium does not have any further comments at this stage, but reserves the opportunity to address the contents of the Local Plan Review and the associated evidence base as it emerges.</p> <p>In making these representations, the Consortium is mindful that the revised draft National Planning Policy Framework has been issued for consultation. Accordingly, the Consortium reserves the opportunity to provide any subsequent comments in accordance with the updated national planning policy context as it emerges.</p>

Respondent	Response
	<p>Collectively the Consortium controls a significant area of land to the north east of Thatcham. This area can make an important and significant contribution towards meeting the housing needs of West Berkshire and the HMA and towards providing infrastructure improvements (notably education facilities) at Thatcham.</p> <p>The Consortium would welcome the opportunity for constructive engagement with the Council's Planning department in order to discuss the contribution that the land north east of Thatcham may be able to make towards achieving the objectives of the Local Plan Review over the period to 2036.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>The West Berkshire District Local Plan 2001 – 2006 contained a policy ENV.20 on the redevelopment of existing buildings in the countryside. However, this policy was superseded by policy C1 on the Location of New Housing in the Countryside in the Housing Site Allocations DPD. This was not replacing like with like as the supporting text to policy ENV20 explained that its purpose was 'to assist the diversification of the rural economy and to maintain or enhance the rural economy.' It did not relate therefore primarily to the provision of new housing.</p> <p>It is important that the new Local Plan contains a policy on the redevelopment of existing buildings in order to be consistent with the advice in the NPPF which states in paragraph 28 that Local Plans 'should support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings.' This is further emphasised in the proposed revisions to the NPPF, which adds additional text in paragraph 85 stating that: 'Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport.'</p> <p>To include provision for the redevelopment of existing buildings in the countryside is also important in promoting a prosperous rural economy as the existing buildings may not be suitable for conversion to business use, necessitating the replacement of the existing buildings in order to satisfy the needs of rural enterprises.</p>
Woolf Bond Planning for JJP Land Ltd	<p>Our client's interests relate to land located at Brook House Farm, Sulhampstead Road, Burghfield. The site has a significant planning history, including a previous application for the erection of 40 dwellings (24 market houses, 10 affordable houses and 6 affordable flats) (LPA Ref. 16/03638/OUTMAJ). Some of the information associated with the previous application, together with additional supporting information, is included in support of these representations.</p> <p>The site extends to a total 2.9ha and is suitable for housing development comprising approximately 40 no. dwellings in a sustainable location as an extension to the settlement of Burghfield Common.</p> <p>The site is an available, suitable and deliverable site, with no constraints to bringing the land forward for development at an early stage during the emerging plan period.</p> <p>As noted above, we propose an amendment to the settlement boundary of Burghfield Common to include our client's site at Brook House Farm together with the adjoining established residential area off Rowan Way and Saxon Gate. This forms an accessible and sustainable location for a medium sized residential development opportunity which as outlined above, is consistent with the current strategy. The site is defined and contained by further permitted development on its western side at Brookhouse Farmhouse (12/00484, 13/01541 an 14/00604).</p>

Respondent	Response
	<p><b>Conclusion</b></p> <p>For the reasons set out above, the Local Plan could risk failing the NPPF tests of soundness for the following reasons:</p> <ul style="list-style-type: none"> <li>• <b>Negatively Prepared</b> – If it does not plan for appropriate housing delivery having regard to minimum needs within West Berkshire District or the wider needs occurring elsewhere in the HMA. Further if it fails to allocate a sufficient amount of housing land to meet pressing needs early on in the plan period.</li> <li>• <b>Unjustified</b> – If the proposed housing distribution strategy fails to acknowledge the continued suitability of Burghfield Common as an appropriate location for housing growth and identifies inappropriate potential housing sites when considered against the reasonable alternative of a housing allocation at Brook House Farm</li> <li>• <b>Ineffective</b> – If the plan fails to propose an appropriate housing distribution strategy or introduce sufficient flexibility into the developable supply over the plan period.</li> <li>• <b>Inconsistent with the National Policy</b> – If the plan fails to allocate an appropriate amount of housing land or in the right location, having particular regard to the need for housing in rural locations.</li> </ul>
Woolf Bond Planning for Donnington New Homes	<p>We propose an amendment to the settlement boundary to include our client's site at Curridge, to the north of Kiln Drive. This forms an accessible and sustainable location for a small to medium sized residential development opportunity. Our client's site is located on the northern side of the village of Curridge. As discussed above it is located within close proximity to the main Urban Area of Newbury and the Service Village of Hermitage. The site comprises undeveloped land bound by residential development on its southern and eastern sides, covering 4.16 ha. The site could be accessed direct from Kiln Drive and suitable visibility splays provided accordingly.</p> <p>The site's southern and eastern boundaries lie adjacent to a ribbon form of development that runs along Kiln Drive and forms the village's settlement boundary.</p> <p><b>Development Considerations</b></p> <p>As discussed in our response to earlier questions, there is a clear imperative in the draft NPPF to provide housing development in rural locations where a site offers the ability to deliver a sustainable form of development. With the above principle in mind, any future scheme's key elements could comprise:</p> <ul style="list-style-type: none"> <li>• Erection of up to 125 no. houses (in a mix of sizes and forms), associated gardens and landscaping;</li> <li>• Provision of local open space and area of allotments for community use acting as a focal point to the settlement of Curridge;</li> <li>• Provision of an appropriate access (to adoptable standard) from Kiln Drive;</li> <li>• Buildings heights to not exceed two storeys, in order to provide for an appropriate transition between built form and the wider countryside beyond; &amp;</li> <li>• Extensive structural planting, including a comprehensive landscape buffer on the site's northern</li> </ul> <p>Furthermore, Curridge Primary School may benefit from an appropriate increase in pupil intake from the immediate area. Our client's land at Curridge is a deliverable site that will deliver significant benefits for both existing and future residents in the area. Accordingly the Council should allocate it for a residential led development. We note that the site's size</p>

Respondent	Response
	<p>comprises 4.16ha and enables a low to medium density scheme to be brought forward that provides for approximately up to 125 no.dwellings.</p> <p><b>Masterplanning &amp; Landscape Considerations</b>                      The site is not subject to any statutory or non-statutory designations for landscape quality, scientific or nature conservation interest and there are no known heritage assets which will be affected by the proposals. The scheme can be supported by a comprehensive landscape strategy to provide a significant amount of green infrastructure which will help assimilate the development into the wider landscape character comprising dwellings interspersed with trees/landscaping. Our client will shortly be commissioning a masterplan exercise, to consider an appropriate residential layout, incorporating a comprehensive landscape strategy and potential community uses. We would be more than happy to share the outcomes from this exercise with the Council should the Council wish to discuss this site opportunity further.</p> <p><b>Highway Considerations</b>                      Vehicular access to the site is proposed from Kiln Drive with appropriate visibility splays provided. Further a safe pedestrian link through the site linking the eastern and western parts of Curridge could be provided generating a highway safety benefit.</p> <p><b>Drainage Considerations</b>                      The site is located entirely within flood zone 1 and there will be no adverse impact on floodplain flows or conveyance as a result of the development. The scheme would be supported by a sustainable drainage strategy that accords with requirements to restrict surface water runoff rates to existing greenfield rates</p> <p><b>Ecological Considerations</b>                      A suite of ecology surveys would be undertaken. At a desktop level there is nothing to suggest that the site is of high biodiversity value. Subject to appropriate mitigation measures, the proposed scheme is appropriate in ecological respects.</p> <p><b>Summary</b>                      The site is under the control of a local housing developer, who is in a position to bring forward the site for an approximate up to 125 no. dwellings, parking, upgraded access, open space and landscaping.                      In addition, the site is deliverable in the immediate five year period and can provide a material number of housing units in a location where the short term need is pressing.</p> <p>For the reasons set out above the site should be allocated within the emerging plan as a housing site allocation for approximately up to 125 no. dwellings and associated open space. The settlement boundary should therefore be revised as illustrated on the plan attached in future iterations of the Local Plan.</p> <p><b>Conclusion</b>                      For the reasons set out above, it is paramount that the Local Plan addresses the below:</p> <ul style="list-style-type: none"> <li>• Positively Prepared – It will need to plan for appropriate housing delivery having regard to minimum needs within West Berkshire District and the wider needs occurring elsewhere in the HMA. Further it will need to allocate a sufficient amount of housing land to meet pressing needs early on in the plan</li> </ul>

Respondent	Response
	<ul style="list-style-type: none"> <li>• Justified – The proposed housing distribution strategy should acknowledge the settlement of Curridge as an appropriate location for housing growth and in turn propose a housing allocation on land to the north of Kiln Drive,</li> <li>• Effective – The plan should propose an appropriate housing distribution strategy and introduce sufficient flexibility into the developable supply over the plan period (including allocation of small and medium sized sites).</li> </ul> <p>Consistent with the National Policy – The plan should allocate an appropriate amount of housing land and in the right location, having particular regard to the need for housing in rural locations on underutilised, smaller sites</p>
Woolf Bond Planning for Donnington New Homes	<p>Our client's interests relate to land located at Ashmore Green Farm, Stoney Lane, Ashmore Green. The site has a significant planning history, including a previous application for its redevelopment to provide 11 no. residential dwellings (LPA Ref. 12/01063/FULMAJ). Some of the information associated with the previous application and additional further information is included in support of these representations.</p> <p>We propose an amendment to the settlement boundary to include our client's site at Ashmore Green Farm, to the north of Stoney Lane. This forms an accessible and sustainable location for a small to medium sized residential development opportunity. The site is deliverable in the immediate five year period and can provide a material number of housing units in a location where the short term need is pressing.</p>
WYG for Donnington New Homes	<p>Donnington New Homes is supportive of the general approach set out in the Local Plan and Sustainability Appraisal Scoping Reports. However, for the reasons set out above, it is requested that a new policy is included in the West Berkshire Local Plan 2036, to include the allocation of land to the south of Sandford Park to deliver up to 500 dwellings and the link road to the A343 at Wash Water.</p> <p>These representations follow previous submissions in 2013 (for inclusion in the Strategic Housing Land Availability Assessment (SHLAA)) and in 2017 in response to the Council's Call for Sites (HELAA). A copy of the March 2017 submission can be found in the attached document.</p>

## Summary of responses

There was a wide range of responses to this question, and a common theme of responses related to the need for policies on health and wellbeing and sport and recreation, for elderly people's accommodation/extra care accommodation, and for community and cultural facilities. In terms of community and cultural facilities this focused on not only the protection but also the provision of such facilities, including churches, community halls, cinemas, theatres, pubs and music halls. One respondent suggested that development with any kind of community benefit should be allowed.

In terms of housing growth Thatcham should now be considered as a suitable location for allocations. There is a suggestion of allocating omission sites or 'back up' sites in the event where sites are not delivering the houses as envisaged, or there are other factors which influence the progress (e.g. economics). One respondent considered that the allocation of sites should concentrate on infilling and brownfield sites before greenfield sites. A respondent commented that there should be consideration of the 20% of housing allocations on sites less than 0.5 hectares, as per the revised NPPF. Similar to the respondents to question 6 there was

consideration of the extension of sustainable settlements and the allocation of 'semi-rural' sites, and for the inclusion of a policy akin to former Local Plan Policy ENV20 for rural businesses.

Infrastructure was highlighted by respondents, with a statutory consultee encouraging a policy on water supply and wastewater. Footpaths, street lighting, health provision and educational establishments were also highlighted. Conversely, one respondent commented that if the housing and industry is planned correctly then leisure, health and cultural facilities will naturally develop.

When considering landscape, biodiversity and heritage there was comment that there should be a strengthening of policy on light pollution and the governance of external lighting, particularly in the AONB; that there should be a protection of irreplaceable habitats such as ancient woodland, and of watercourses; there should be a definitive definition of 'Green Infrastructure', which should encompass 'Blue Infrastructure'; and that there should be consideration of further detail of heritage assets.

When considering human health an internal consultee noted that a priority of the Council is for the protection and improvement of local air quality. Therefore, updating the policy for pollution and noise in line with new guidance is needed.

There were queries about the duty to cooperate and taking on unmet need from surrounding authorities; housing affordability; and whether West Berkshire Council aims to boost the supply of housing when looking at the SHMA and Government target figures.

## **Council response**

All the comments made have been noted and will be given full consideration at the appropriate stage in the review of the Local Plan (LPR). The Council will need to prepare the Review to conform to the revised national policy in the NPPF published on 24th July 2018.

The four Western Berkshire authorities are committed to meeting the housing requirement across the Western Housing Market Area. To this end the Councils have agreed a Memorandum of Understanding which states that the four authorities will continue to work together to ensure that local plans in the area set out policies and proposals that collectively provide for the full housing needs of the area, including unmet need in Reading.

Housing need will be assessed using the government's standard method contained in the revised NPPF and PPG. This assessment will use the most up to date household projections as a starting point and the resultant need figure is considered to represent the minimum requirement to be included within the Local Plan Review to 2036. This figure will supersede the OAN in the 2016 Berkshire SHMA. The LPR will set out the strategy to meet this revised requirement. It will consider both strategic and non-strategic growth opportunities to meet the need over the plan period, including housing in rural areas of the District. The HELAA will provide evidence of growth opportunities in the area and will identify sites that have potential for development to inform the spatial strategy. Most of the sites that will be included were submitted through the Call for Sites (December 2016 to March 2017), through which agents and the public were invited to submit sites that they considered developable.

Where respondents have highlighted specific concerns and have made suggestions for the strengthening of particular topics they will be taken forward in more detail through the development of both strategic and local policies as appropriate.

## Appendix B

### Summary of responses received to the SA/SEA Scoping Report (February 2018)

Number of responses received: 207

#### Summary of responses:

There was an overall consensus that the baseline information was adequate with some exceptions relating to the age of some data and the paucity of data on green infrastructure, tourism and recreation, and the racehorse/equestrian industry. There were many useful suggestions to tighten up the evidence.

Overall there was general agreement with the key sustainability issues and objectives identified. A number of refinements were suggested from statutory bodies and 'tourism' proposed as an addition. Ranking the objectives was not seen as helpful.

There was some overlap with the issues raised under the Local Plan Review scoping report, including:

- the timescale of the Review;
- the justification for any large scale development to the south of Reading;
- an endorsement of cross boundary working;
- favouring large site allocations in and around urban areas as the most "sustainable locations" and in contrast;
- the benefits of allocating smaller sites adjacent to smaller sized settlements as a potential strategy for aiding housing delivery and supporting sustainable development in rural areas;
- the need for a settlement boundary review;
- a greater commitment to fulfil the unmet housing need from neighbouring authorities, especially Reading;
- the need for an overall vision to provide context and sense of direction;
- the weight to be given to the draft and final versions of the revised NPPF;
- the need to present housing numbers by spatial area;
- the provision of housing for younger people and affordable housing;
- the provision of necessary infrastructure with the developments, including implications of electric/zero carbon technological developments.

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q1: Are there other relevant policies, plans, programmes, and sustainable development objectives that will affect or influence the West Berkshire Local Plan Review?

Number of responses received: 21

Respondent	Summary of Response
Julian Worth	<p>Stronger links need to be made with the Minerals &amp; Waste Local Plan as this covers important and potentially disruptive issues such as extraction, which impact significantly on the subjects considered in the Local Plan, notably landscape and water. In general, extraction in new areas should be opposed - alternative sources of aggregates are available, notably through the Theale rail depots, and despoilation of West Berks can be avoided by making greater use of these alternatives</p>
Stratfield Mortimer Parish Council	<p>The initial section of the consultation document identifies key issues relevant to West Berks and goes on to give the Sustainability Appraisals (SA) objectives. However the key issues seem to be a mix of trends, such as an ageing population, and desirable outcomes, such as maintaining vitality of town and village centres. Should they not be one or the other? Should they not all be existing or expected problems or opportunities? Even a wording change would at least give consistency. For instance.....The continuing threat posed to town and village centres by changes in social attitudes.... as opposed to the existing ... Maintaining vitality of town and villages centres.....</p> <p>Irrespective of the above, it is considered that the changes likely to be brought about by automation and AI, for example, are a key issue both in the physical changes they will bring as well as the social change that is expected as a result. One of those social changes could be the erosion of community spirit in the towns and villages of West Berks if identified trends in behaviour continue. This is also considered a key issue.</p> <p>The examples above illustrate a wider point that the whole analysis seems to rest on an examination of existing policies and information describing the present situation. It is felt very strongly that likely future trends and developments should be considered just as, if not more than, important than the existing situation.</p> <p>As far as the objectives are concerned it could be argued that some of them are contradictory but this may well be intentional and acceptable. For example, to promote the opportunity for travel may contradict the aim of conserving and enhancing the natural environment.</p> <p>Of more significance is the objective of promoting and maximising opportunities for all forms of safer and sustainable travel. Surely in sustainability terms should not the first action be to minimise the need to travel? Only when a trip is necessary should it be safe and sustainable.</p> <p>Similarly should not the objective about emissions start off with eliminating the need for unnecessary emissions before going any further?</p>
Carter Planning for Mr RLA Jones	None

Respondent	Summary of Response
Burghfield Parish Council	Not that we are aware of.
Burghfield NDP Steering Group	Not that we are aware of.
North Wessex Downs AONB	Failed to acknowledge AONB management Plan which WB have signed up to and forms part of their development plan. Need to now include the Governments 25 year Environment Plan and proposed amendments to the NPPF.
Turley Associates for North East Thatcham Consortium	<p>These representations are provided jointly and severally on behalf of the North East Thatcham Consortium (“the Consortium”) in response to the Local Plan Review to 2036 Sustainability Appraisal Scoping Report. Alongside these representations, comments have also been submitted in response to the associated Local Plan Review to 2036 Scoping Report.</p> <p>The North East Thatcham Consortium comprises A2Dominion; Donnington New Homes, Ptarmigan and Gully Farm and these representations are made jointly and severally on behalf of the Consortium members.</p> <p>The Consortium have reviewed Appendix 1 of the SA Scoping report and would recommend that the following policies, plans and programmes be reviewed and their respective requirements/ recommendations be incorporated for incorporation within the SA:</p> <ul style="list-style-type: none"> <li>• The draft revisions to the National Planning Policy Framework (NPPF). <a href="https://www.gov.uk/government/collections/national-planning-policy-framework-and-developer-contribution-consultations">https://www.gov.uk/government/collections/national-planning-policy-framework-and-developer-contribution-consultations</a></li> </ul> <p>At the end of Appendix A and on Page 12 of the SA Scoping Report are a summary of the key sustainability objectives/ issues emerging from the review of relevant policies, plans and programmes. The Consortium considers that the following objectives should be presented or amended to inform the SA process and Local Plan Review:</p> <ul style="list-style-type: none"> <li>• Conserve and enhance wildlife habitats and species <i>or where possible secure net overall gain where development is needed to satisfy other objectives.</i></li> <li>• To improve educational standards and access to educational facilities <i>in line with the growth in local communities.</i></li> <li>• The need to provide for new community infrastructure such as primary and secondary schools to meet current and projected demand.</li> <li>• Maintaining the vitality of town and village centres <i>through the allocation of new housing and employment land in the most sustainable locations.</i></li> <li>• <i>The need to tackle areas of deprivation in Thatcham and Newbury in the context of a relatively affluent local authority area.</i></li> </ul>
Woolf Bond Planning for Donnington New Homes	We agree that the suggested list of relevant policies, plans, programmes, and sustainable development objectives are appropriate.
Historic England	<p>In Appendix 1: List and Review of Relevant Plans, Programmes and Strategies reference should be made to the 2016 Culture White Paper. “Conserving and enhancing the historic environment” is a key objective of the NPPF.</p> <p>We welcome the identification of the Historic Environment Character Zoning and Historic Environment Action Plan in Appendix 1. Other relevant background documents for the historic environment should ideally be specified in the text e.g. the West Berkshire</p>

Respondent	Summary of Response
	Historic Environment Record, the West Berkshire Historic Landscape Characterisation, Conservation Area Character Appraisals, any archaeological studies etc.
Pegasus Planning Group for Donnington New Homes	<p><i>Response relates to land adjacent to Long Lane, Newbury</i></p> <p>The National Planning Policy Framework Draft text for consultation will affect and influence the West Berkshire Local Plan Review. This is a new version of the National Planning Policy Framework (2012), which was published on the 5th March 2018, after the Sustainability Appraisal Scoping Report was released.</p> <p>The Draft Revised NPPF alters national planning policy in several key areas, and this will need to be reflected in the Local Plan Review, as the Local Plan to 2036 has to be consistent with prevailing national planning policy. The key area which will need reviewing is the methodology for calculating Objectively Assessed Need (OAN) for new housing in the Borough. Site allocations will also need to be reviewed so that all those allocated are consistent with the aims and objectives contained within the new national planning policy.</p> <p>Reading Borough Council published its Pre-Submission Draft Local Plan on the 30th November 2017. It includes a new calculation of housing need for the Borough, and policy on the mix and tenure of new dwellings. Policy H1 states that:</p> <p>“Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period.”</p> <p>Paragraph 4.4.12 states that:</p> <p>“Reading is likely to provide a significantly greater proportion of smaller dwellings than its neighbours in the Western Berkshire HMA. This may mean that some rebalancing across the HMA is appropriate, with other authorities potentially providing a greater proportion of larger family accommodation.”</p> <p>This demonstrates that Reading will require some of its housing need to be met by other authorities within the HMA. Where other authorities are meeting this need, it should be in the form of larger family dwellings. The objectives should therefore recognise the important role that West Berkshire has in meeting the needs of households not accommodated in Reading, or other parts of the HMA.</p>
Archaeology Team West Berkshire Council	<p>SEA/SA Objective 5 “To ensure that the character and distinctiveness of the natural, built and historic environment is conserved and where possible, enhanced” would be better split into the natural and historic (built being part of this). This was the advice given by Historic England (There is a danger that conflating the two could mask effects on one or the other) and we would echo this. Though the two elements are intertwined, there are different evidence bases for them, as well as legislation and planning guidance.</p> <p>Missing from the policies is the Culture White Paper 2016 – should go under National, key objectives were</p> <p>“Culture can be used in place-making, cultural attractions are the most commonly mentioned factor in terms of what makes the UK an attractive place to visit, the power of culture can drive economic growth, education and wellbeing”</p> <p>Should the emerging Vision 2036 be mentioned under Plans?</p> <p>ie</p> <p><b>Vision 2036</b> West Berkshire in 2036 where</p>

Respondent	Summary of Response
	<ol style="list-style-type: none"> <li>1. everyone benefits from a thriving economy.</li> <li>2. residents get the housing they need.</li> <li>3. individuals and communities are enabled to fulfil their potential.</li> <li>4. everyone experiences good health and wellbeing and where people are able to age well.</li> <li>5. the local environment is treasured and protected for future generations to enjoy.</li> </ol>
Public Transport Team West Berkshire Council	<p>No, I believe that through reviewing established plans such as the Local Transport Plan and related Implementation Programme, the assessment that has culminated in this Sustainability Appraisal Scoping Report has identified the key issues at a local level. In addition the document highlights the context of the National Planning Policy Framework and the Housing White Paper (2017), while also referencing in the Appendix 1 the wider global and EU policy context. The SA Assessment also flags considerations in terms of possible impact on sections of the community and on the environment, which it's noted will be subject to detailed impact assessments.</p>
Francis Connolly	<p>Policies and proposals of neighbouring authorities, particularly Reading and Wokingham. Regional and sub regional transport plans and proposals including airports and rail.</p>
Ian Campbell	<p>There is one critical objective, which can only be achieved through the pursuit of sustainable policies, which is not explicitly stated in the February 2018 draft Local Plan. As there is no evidence in this Local Plan that the intended future supply of new homes will return house prices to affordable levels, what other steps will be taken by the Council which guarantee to return house prices to their historic, equilibrium levels? Or is this not seen to be an objective of the Local Plan? If so the intention to penalise the next generation is omitted. Is this cut in their living standards fair to the next generation?</p> <p>AN OMISSION. There is a housing crisis in West Berkshire, in the Thames Valley and in much of the south east of England. It is now high on the agenda of this Government and the official opposition in Parliament. There is, in Westminster a consensus that many more homes must be built. Due to supply shortages house prices in popular areas are far too high. But the fact that the remedy lies in hands of the council through this Local Plan is not acknowledged. Denial of this consequence is timid. Without this candour, together with a solution, the Local Plan cannot be sustainable.</p> <p>It is clear from Ministerial and Prime Ministerial statements the Government sees the current planning system, possibly including this Local Plan to be part of a general planning failure.</p> <p>BROKEN? The crisis can be quantified with simplicity. Throughout most of the Thames Valley, including West Berkshire, the ratio of salaries to house prices is now about 12:1. A generation ago they were below 3:1. As house prices go up if their supply is restricted this dramatic deterioration in affordability is evidence of the consequences of several decades of restrictions on the supply of local house building land. Housing policies have progressively moved wealth from the have nots to the haves. By most planners and politicians the consequence of restricting supply was either not foreseen or was deliberately ignored. As a policy approach it is not sustainable. The system, the Government says, is broken. West Berkshire Council seems unaware this is so.</p> <p>WHO SAID WHAT. The following eight quotations chart the story of a broken housing market in the Thames Valley. In the eighties and nineties Berkshire County Council tried to slow down growth. In consequence it failed to plan far enough ahead. This is when the collapse in sustainability began.</p>

Respondent	Summary of Response
	<p>“The regional planning group (SERPLAN) is proposing what I believe is an unacceptable level of new housing in Berkshire. The task of the forthcoming consultations will be to moderate this, and yet not leave the county open to challenge.” (Coun. Phillip Houldsworth, Chairman of Berkshire County Council Environment Committee, December 1990)</p> <p>“There is widespread resistance to continuing development in many parts of the region. That resistance is informed, politically potent, and increasingly effective”. (South East Regional Planning, SERPLAN,1990)</p> <p>“It is commonly said that Berkshire suffers from the problems of success. In these circumstances it is natural to wonder what local government in general, and the County Council in particular, can do to make sense of these fast moving changes and plan for the future with any hope of success.” Foreword by R.H.Clarke, Director of Highways and Planning. Towards 2000; Shaping the Future of Berkshire. Berkshire County Council Dept. Of Highways and Planning; February 1990)</p> <p>“Historically, house prices in the South East, including Berkshire, have been high in relation to other regions in the UK. The Halifax Building Society estimate that in the fourth quarter of 1990 the average price of all houses in South East was £88,936-33% above average prices in the UK as a whole (£66,811). Yet average annual incomes in Berkshire were only 10% to 18% higher than UK equivalents. This implies that Berkshire’s residents will need to devote a higher proportion of their income to house purchase than the national average. As financial institutions will only generally lend between 2.25 and 3 times the annual household income, this suggests that households other than those on above incomes, or with substantial savings, will have difficulties in meeting the cost of house purchase in Berkshire.” ( A New Strategy for Berkshire; The Structure Plan Review: Background Paper. Population and Housing; para’s 35/36. March 1991)</p> <p>“Under provision of housing and a growing rate of household formation will result in labour shortages and a rapid increase in house prices. These impose a penalty on wage earners, whose net disposable income will be reduced as a growing percentage of their family budget is allocated to increasingly expensive accommodation. Good news for existing home owners, whose equity will increase, but rough justice for the next generation of home owners and the socially disadvantaged, unable to compete in the market place.” (Campbell Gordon, Prosperity at Risk, June 1992)</p> <p>“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is the housing is increasingly unaffordable for ordinary working class people who are struggling to get by... We need to build many more houses, of the type people want to live in, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system.” (Forward by Prime Minister in February 2017 White Paper, ‘Fixing up broken housing market’; DCLG)</p> <p>“ Soaring prices and rising rents caused by a shortage of the right homes in the right places has slammed the door of the housing market in the face of a whole generation.” (Foreword in the same white paper by the Secretary of State for Communities and Local Government; February 2017)</p> <p>“The truth is that for, nearly 20 years, Governments of all parties and politicians of all stripes have failed to build enough new homes to meet the housing needs of our fellow citizens. We have done that even though almost every single one of us in this House knows</p>

Respondent	Summary of Response
	<p>that happy feeling of living in a home we own. In all our constituencies, for huge numbers of people we represent, the dream of home ownership has turned into a tantalising mirage-a nightmare which they can never hope to get out of. We have failed through a combination of cowardice, complacency, laziness and incomprehension.”</p> <p>(Nick Boles, MP and previous Housing Minister; Housing, Planning and Green Belt debate, House of Commons, 6 February 2018)</p> <p>MORE OMISSIONS There are other sustainable objectives that are also ignored in this Local Plan.</p> <p>What happens at the end of the Plan period? After 2036 where will new homes go after that? The Plan is silent.</p> <p>IS THERE A THREAT? The Government is committed to protecting the Green Belt. Other protected areas such as AONB, flood plains, and SSI's are also likely to remain protected in the very long term. Which suggests the remaining unprotected land is suitable for housing in the long term. The Plan does not say so. Residents ought to be told some, perhaps a great deal of West Berkshire's unprotected open countryside will eventually have to be built on, but when, where and how much being are the key issues this Local Plan fails to address. The omission is shortsighted.</p> <p>OVERSPILL There is a growing overspill problem. Reading has an overspill problem because it lacks land which is recognised by West Berkshire in the West Berkshire Spatial Framework. This is a step forward. Slough too has the same problem. Slough Council proposes a major urban extension to the north onto green belt land in adjoining council areas which those councils oppose. In east Berkshire the Duty to Cooperate is failing. West Berkshire has plenty of unprotected land. Does it also have a Duty to Cooperate with Slough Council as it has plenty of unprotected land? The Plan is silent.</p> <p>London has the same overspill problem. So too has the County of Surrey, which although mainly a dormitory area, about 90% of Surrey land is protected. Where will Surrey's overspill go in the future, after the current local plans expire? North and east Hampshire are obvious locations if Surrey's future population growth will be located close to Surrey. North Hampshire adjoins West Berkshire. Is West Berkshire talking to Hampshire councils about long term, highly sustainable new settlement solutions? If not, why not?</p> <p>London's overspill problems are unique. They are now active topics for those who look ahead. See for example 'Next-door Neighbours- collaborative working across the London boundary'; Centre for London and Southern Policy Centre., January 2018.</p> <p>West London's overspill pressures will fall first on Slough, Windsor and Maidenhead and other Surrey and Buckingham councils, who have very little unprotected land. Spatially how far does West Berkshire's Duty to Cooperate extend, to assist London? Overspill examined from a sustainability perspective suggests a high and growing obligation exists for councils with an abundance of unprotected land within easy commuting reach of London. Although this is plain to an outside observer the West Berkshire Local Plan is silent.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>An additional document that will be very relevant to the Sustainability Appraisal is the settlement boundary review that the Council is intending to undertake, which is referred to in Appendix 2 to the 'West Berkshire Local Plan Review to 2036 Scoping Report,' (February 2018) in relation to policy C1 on Location of New Housing in the Countryside. This needs to be carried out at an early stage in the Local Plan preparation as it is critical to addressing some of the key social, environmental and economic issues that have been identified as being relevant to West Berkshire including:</p> <ul style="list-style-type: none"> <li>• The allocation and phasing of the housing delivery up to 2036, that meets the predicted demand using the new, standardised way of calculating housing demand to reflect current and future housing pressures;</li> <li>• An identified shortage of affordable and/or suitable homes for local people at different stages of life;</li> </ul>

Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• Allocation of appropriate employment land;</li> <li>• Maintaining vitality of town and villages centres; (p4 &amp; 12)</li> </ul>
Natural England	Reference should be made to the Government's 25 year Environment Plan and proposed amendments to the NPPF.
Joy Schlaudraff	<p>Yes. The new draft nppf. Global issues (immigration) National need for housing/development</p>
Woolf Bond Planning for Donnington New Homes	We agree that the suggested list of relevant policies, plans, programmes, and sustainable development objectives are appropriate.
Pegasus Planning Group for Donnington New Homes	<p><i>Response relates to land adjacent to Smitham Bridge Road, Hungerford</i></p> <p>The National Planning Policy Framework Draft text for consultation will affect and influence the West Berkshire Local Plan Review. This is a new version of the National Planning Policy Framework (2012), which was published on the 5th March 2018, after the Sustainability Appraisal Scoping Report was released.</p> <p>The Draft Revised NPPF alters national planning policy in several key areas, and this will need to be reflected in the Local Plan Review, as the Local Plan to 2036 has to be consistent with prevailing national planning policy. Some of the key areas which will need reviewing are the methodology for calculating Objectively Assessed Need (OAN) for new housing in the Borough, the provision of accessible homes for older people, and the provision of green space in new developments. Site allocations will also need to be reviewed so that all those allocated are consistent with the aims and objectives contained within the new national planning policy.</p> <p>Reading Borough Council published its Pre-Submission Draft Local Plan on the 30th November 2017. It includes a new calculation of housing need for the Borough, and policy on the mix and tenure of new dwellings. Policy H1 states that: "Provision will be made for at least an additional 15,433 homes (averaging 671 homes per annum) in Reading Borough for the period 2013 to 2036. The Council will continue to work with neighbouring authorities within the Western Berkshire Housing Market Area to ensure that the shortfall of 644 dwellings that cannot be provided within Reading will be met over the plan period."</p> <p>Paragraph 4.4.12 states that: "Reading is likely to provide a significantly greater proportion of smaller dwellings than its neighbours in the Western Berkshire HMA. This may mean that some rebalancing across the HMA is appropriate, with other authorities potentially providing a greater proportion of larger family accommodation."</p> <p>This demonstrates that Reading will require some of its housing need to be met by other authorities within the HMA. Where other authorities are meeting this need, it should be in the form of larger family dwellings. The objectives should therefore recognise the important role that West Berkshire has in meeting the needs of households not accommodated in Reading, or other parts of the HMA.</p>

Respondent	Summary of Response
Environment Agency	<p>We are pleased to see that you have included our comments and amendments as set out in our response letter dated 25 January 2018 to the draft Scoping Report dated December 2017.</p> <p><b>Catchment Abstraction Management Strategy (CAMS)</b>  You will need to include our Catchment Abstraction Management Strategy (CAMS) to your list of policies, plans, programmes in Appendix 1. These strategies assess water availability determining how much water can be abstracted whilst leaving sufficient water within the environment to meet its ecological needs. West Berkshire falls under the Kennet and Vale of White Horse Catchment. Please use the following link to our CAMS documents on the GOV.UK website <a href="https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process">https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process</a></p> <p><b>Thames Catchment Flood Management Plan</b>  This is an overview of the flood risk across the river catchment and recommended ways of managing the risk now and over the next 50 to 100 years. This document should also be referred to when considering flood risk in your local plan and should be included in your list of policies, plans, programmes in Appendix 1. Please use the following link to our Thames Catchment Flood Management Plan documents on the GOV.UK website <a href="https://www.gov.uk/government/publications/thames-catchment-flood-management-plan">https://www.gov.uk/government/publications/thames-catchment-flood-management-plan</a></p> <p><b>Water Cycle Study</b>  You have said that you are considering a water cycle study as part of your evidence base. We need to know that the proposed growth within your local plan does not lead to a deterioration in water framework directive (WFD) status of the receiving rivers and that it does not prevent the future target status objectives being achieved. Infrastructure capacity is only one aspect that needs to be considered (e.g. capacity of the sewer network to accommodate the increased flows). Environmental capacity is the other key consideration which has not been assessed. For example there may be infrastructure capacity to accommodate the increased effluent, however this does not tell us if the increased effluent flow would lead to a deterioration in WFD status for ammonia, biochemical oxygen demand (BOD), and Phosphate. It is strongly recommended that a Water Cycle Study (WCS) or if appropriate a water quality assessment is completed as it will form part of the evidence base to support the local plan.</p> <p>An effective water cycle study and strategy will help achieve the following objectives:  1. New development only within environmental constraints; 2. New development in the most sustainable location, in relation to the water environment; 3. Water cycle infrastructure in place before new development is occupied and; 4. Opportunities for more sustainable infrastructure options realised. If you cannot satisfy the following questions you will need to produce a water cycle study in order for your local plan to be compliant with paragraphs 109, 158, 165 and 173 of the NPPF.</p> <p>Will the proposed housing growth have a detrimental impact on water quality? · Is there sufficient environmental capacity within the receiving water environment to accommodate the resulting increase in flow and pollutant loads from the Sewage Treatment Works as the result of the planned housing growth? · If not, are there alternative discharge locations that will not cause a failure of water quality targets or cause deterioration in water quality? · Is there an increased risk of discharges from storm water overflows causing an adverse water quality impact? · Will the sewerage undertaker need to apply to increase the level of treated sewage effluent that is allowed to be discharged under the existing environmental permits, to allow for future growth? · Will the quality standard on the environmental permit need to be tightened to meet existing or future water quality standards as a result of the proposed growth (e.g. Water Framework Directive (WFD))? · Can the existing sewerage and wastewater treatment networks cope with the increased</p>

Respondent	Summary of Response
	<p>wastewater the proposed growth will generate? As part of the duty to co-operate with neighboring authorities it is important to consider the cumulative impact of growth on the receiving water courses. For example there may be cases where more than one authority are planning on building homes within the same sewage treatment works (STW) catchment. If both are assessed in isolation, this may lead to an underestimation of the impact on the water environment. Any WCS assessment should have a joint approach and information sharing between the authorities is important.</p>
<p>Energy Team West Berkshire Council</p>	<p>Reading through the scoping report there doesn't appear to be any reference or recognition of the UK Clean Growth Strategy that was published in October 2017 by the Dept for Business, Energy and Industrial Strategy. This strategy outlines the actions that the government will take to grow our national income while cutting greenhouse gas emissions. Amongst other areas it covers:</p> <ul style="list-style-type: none"> <li>• Carbon Capture and storage</li> <li>• Phasing out installation of high carbon forms of fossil fuels in new and existing business during the 2020's</li> <li>• Phasing out the installation of high carbon forms of fossil fuel in new and existing homes, starting with new homes.</li> <li>• Strengthening energy performance standards for new and existing homes under building regs INC futureproofing new homes for low carbon heating</li> <li>• Build and extend heat networks across the country</li> <li>• Ending the sale of new conventional petrol and diesel cars and vans by 2040</li> <li>• Plans for public sector to lead the way in transitioning to zero emission vehicles</li> </ul> <p>The review of WBLP should be taking all these actions into account in its function as a way of delivering the above.</p>
<p>Mid &amp; West Berks Local Access Forum</p>	<p>1. The West Berkshire Rights of Way Improvement Plan will be relevant (ROWIP). Every local authority has a statutory duty it have a ROWIP – see <a href="http://info.westberks.gov.uk/article/29147">http://info.westberks.gov.uk/article/29147</a></p> <p>2. The Mid &amp; West Berks Local Access Forum would like to bring attention to its current policy on development and bring to the attention of the Council that the Forum is <b>a statutory</b> body.</p> <p style="text-align: center;"><b>MID AND WEST BERKSHIRE LOCAL ACCESS FORUM</b></p> <p style="text-align: center;"><b>Policy relating to Planning Applications for Housing, Roads, Minerals &amp; Waste sites and other industrial sites.</b></p> <p>The Forum is a statutory body set up under the CROW Act 2000 to advise local authorities and other bodies on public access, including the improvement of public rights of way for recreational and utility purposes.</p> <p>The CROW Act 2000 required all local authorities to produce a Rights of Way Improvement Plan (ROWIP) which can be found on the relevant local authority website. The plan has a number of objectives which relate to maintaining and improving the public rights of way network and also the development of new and improved public access generally.</p> <p>The Forum will consider the following when commenting on plans.</p> <p>That, the development:</p> <ol style="list-style-type: none"> <li>i. does not adversely affect existing public rights of way or other public open spaces in the area;</li> <li>ii. offers equivalent, or improved, diversion of existing public right of way affected by the development;</li> <li>iii. provides increased and / or improved off-road access to the existing public rights of way network in the area, and to existing and new facilities, open spaces and the countryside;</li> </ol>

Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>iv. provides increased and /or improved off-road access for as many different user groups as possible, that is, pedestrians, cyclists, equestrians and disabled users;</li> <li>v. Provides paths which are definitive, rather than permissive, and are therefore added to the definitive map and statement; Conforms to the British Standard 'Gaps, Gates and Stiles' and Defra's guidance "Good practical guidance for Local Authorities on compliance with the equalities act 2010"</li> </ul> <p><b>3. We draw your attention to the DfT's document</b> 'Local Cycling and Walking Infrastructure Plans' at <a href="https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/607016/cycling-walking-infrastructure-technical-guidance.pdf">https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/607016/cycling-walking-infrastructure-technical-guidance.pdf</a></p>
British Horse Society	<ul style="list-style-type: none"> <li>i. The West Berks Council Rights of Way Improvement Plan (ROWIP) is probably relevant.</li> <li>ii. Please note the policy statement of the Mid &amp; West Berks Local Access Forum on development given in its response to this consultation.</li> <li>iii. Strategy for the Horse Industry in England and Wales : <a href="https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales">https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales</a></li> <li>iv. A report of research on the Horse Industry in Great Britain <a href="https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain">https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain</a></li> <li>v. 'Making Ways for horses' by the Equestrian Access Forum <a href="http://www.bhs.org.uk/~media/bhs/files/pdf-documents/making-ways-for-horses.ashx?la=en">http://www.bhs.org.uk/~media/bhs/files/pdf-documents/making-ways-for-horses.ashx?la=en</a></li> <li>vi. The Health Benefits of Horse Riding at <a href="http://www.bhs.org.uk/enjoy-riding/health-benefits">http://www.bhs.org.uk/enjoy-riding/health-benefits</a></li> </ul> <p>It might be worth asking the British Horse Society via its Head Office for its policy statements on development relating to equestrianism / horse industry.</p> <p>Policies need to be developed <u>specific for the equestrian community</u> for the construction of equestrian accommodation (stabling, field shelters, riding arenas / indoor schools) and importantly horses need to be catered for when off road paths are considered. The viability of equestrian establishments can depend on the proximity of a good rights of way network, eg. Curridge Green Riding School.</p> <p>Focussing on where people live is reasonable but bear in mind that green infrastructure (assuming GI includes public paths and open spaces) needs to be preserved and improved from where people <b>ride</b> which is not necessarily where they live.</p> <p>The West Berks planning dept probably somehow needs to become much more familiar with equestrian issues.</p>

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q2: Do you agree that the baseline data collected in Appendix 2 is appropriate to the West Berkshire Local Plan Review?

Number of responses received: 21

Respondent	Summary of Response
Stratfield Mortimer Parish Council	Yes
Carter Planning for Mr R.L.A. Jones	<p>Yes. However it would have been helpful if “housing” could follow “population”. These two topics are linked and are fundamental to the new Local Plan. It would have been useful to state that the SHMA 2016 (Strategic Housing Market Assessment) which is referred to will be regularly updated. It would also be useful to state what the OAN (objectively assessed housing need) is currently, how often and by what mechanism it will be updated in future and that it will be regularly updated to inform the new Local Plan.</p>
Burghfield Parish Council	Yes. This seems a very thorough account of where we are.
Burghfield NDP Steering Group	Yes. This seems a very thorough account of where we are.
North Wessex Downs AONB	No. Data should be spilt to show housing numbers in and outside of the AONB to be more accurate and better demonstrate pressure. Would also be helpful to show percentage increase in housing numbers and applications.
Turley Associates for North East Thatcham Consortium	<p>The Consortium have reviewed the baseline data presented within Appendix 2 of the SA Report and make the following comments to ensure that the Local Plan Review makes the maximum social, economic and environmental contribution to West Berkshire:</p> <ul style="list-style-type: none"> <li>• Page 11- 12 of Appendix 2 presents the baseline data with regards to the provision of, and access to, education within West Berkshire. The Consortium recognises the need for additional primary and secondary places across the District but notes that the baseline data with regards to current provision is focused mainly on Newbury. The Consortium believe there to be a significant historical requirement for both Primary and Secondary school places within Thatcham which can only be addressed via the provision of new development. The Consortium agrees however that the Local Plan Review must recognise the future demand for both primary and secondary school places within both Thatcham and Newbury</li> <li>• Page 12 -14 of Appendix 2 presents the current baseline situation with regards to the availability and provision of housing. The Consortium acknowledges the fact that West Berkshire is one of the most expensive places to purchase new housing outside London and recognises that demand since the recession has significantly exceeded supply. This is unlikely to change in the future. The Consortium also supports the requirement for significant additional affordable housing, particularly</li> </ul>

Respondent	Summary of Response
	<p>for local residents and key workers. The Consortium also considers that the baseline data should refer to the potential requirement across the HMA (and by definition Thatcham and Newbury as areas of focused growth) for a greater proportion of family housing given the admission by Reading Borough Council in their emerging Local Plan that their ability to deliver family housing will be constrained.</p> <ul style="list-style-type: none"> <li>• Pages 16 and 17 of Appendix 2 present the baseline data with regards to the presence of Deprivation within West Berkshire. The Consortium notes the presence of significant pockets of deprivation around Newbury and Thatcham which is notable given that they sit in relatively affluent areas. The Consortium notes that one of the factors behind this deprivation is the lack of affordable housing and key services and the Consortium therefore agrees that the SA Scoping report should identify these pockets of deprivation as a key sustainability issue to positively address.</li> <li>• The baseline data with regards to Economy and Employment does not appear to reference the latest evidence on West Berkshire's economy and the conclusions of the Economic Development Needs Assessment (EDNA) which identifies the need for up to 75.2ha of additional employment land over the period to 2036. This data and indeed any other recent baseline data pertaining to the economy should be reviewed and incorporated into the scope of the SA.</li> <li>• With regards to the baseline data associated with Transportation within West Berkshire, the Consortium broadly agrees with the data provided but makes the following specific comments: <ul style="list-style-type: none"> <li>○ The commuting survey appears to be based upon the 2011 Census and should therefore be updated in order to reflect current commuting patterns.</li> <li>○ Notwithstanding the results of any new data, the Consortium recognises that a greater percentage of workers within West Berkshire utilise the private car as a means of commuting to work compared to the South East and England and Wales. Given the potential implications upon air quality and congestion (and therefore productivity) the Consortium considers that the Local Plan should focus major development in those areas with mainline train stations with access to the regional economy.</li> </ul> </li> </ul>
Woolf Bond Planning for Donnington New Homes	We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.
Historic England	We consider the baseline data for the historic environment to be comprehensive and adequate. However, on the 2017 Heritage at Risk Register there are, strictly-speaking, three listed structures, four scheduled monuments, three Registered Historic Parks and Gardens and one dual designation (listed and scheduled) deemed to be at risk. It should be noted that outside London, the Register does not include Grade II listed secular buildings. We note that the Council has not undertaken a survey of Grade II listed buildings nor has it completed Historic England's annual survey of Conservation Areas to see if any are at risk. These are, therefore, correctly identified as gaps in the baseline.
Pegasus Planning Group for Donnington New Homes	Yes – the baseline data collected in Appendix 2 covers all the relevant areas, and is appropriate to the West Berkshire Local Plan Review.

Respondent	Summary of Response
Archaeology Team West Berkshire Council	There is still a gap in terms of surveying the condition of both Grade II listed secular buildings and Conservation Areas. There is not a mechanism at the moment to assess Grade II listed buildings but Conservation Areas do need up to date Appraisals in order for their At Risk status to be determined. There is a tentative plan to address Conservation Area Appraisals – many local communities are keen to get involved.
Transport Team West Berkshire District Council	In general, I agree that the baseline data that has been collected and carefully set out in Appendix 2 is appropriate to the West Berkshire Local Plan Review. However, in relation to the section on Transport, perhaps it may be appropriate to review the percentages in terms of average delay per vehicle as a proportion of average journey time, if more recent data than that cited from the 2005 Atkins study is available.
Francis Connolly	Yes generally
Hampshire County Council	We agree that the baseline data collected in Appendix 2 is appropriate to the WBLP Review.
Ian Campbell	<p>DEFECTIVE DATA? In my comments on Question 1 above I list several omissions in the Local Plan. As this Local Plan does not provide sufficient building land to return house prices over a long period to historic normal levels this conclusion suggests the data used in the Plan preparation is not adequate.</p> <p>You list the West of Berkshire Spatial Planning Framework as one of the relevant documents. It contains two errors</p> <p>ERROR 1. It is not sustainable as it fails to put forward a strategy for a sustainable period of time in the future. In a growth area like West Berkshire a sustainable period of time must extend far beyond 2036.</p> <p>ERROR 2. It promotes a urban settlement in the countryside of 15,000 new homes. The choice of this location is a response to a commercial initiative by a consortium of land owners and builders to build on a site of their, not the four councils choice. The adoption of this land is not the result of a rational approach to a site identification exercise assessing all other sites which may be equally suitable. Without first obtaining independent verification how do the four councils know Grazeley is the right location? This is not possible without the right evidence.</p> <p>UNTESTED My submission to you dated 14 January 2014 (Para. 18) said the basis of selection of countryside sites seemed crude. The new draft Local Plan does not explain the rationale for selecting open countryside sites. Unhappily there is no reason to alter this description. This exclusion is a particular concern relating to the Grazeley option, because a settlement here sets a historic precedent. It will establish the pattern for further growth in the decades after 2036. If the correct long term approach to solving the Thames Valley housing crisis is a major new settlement or urban extension in the open countryside it is especially important that the search area and the criteria for selection the location have proper regard to the long term, sustainability score of all other potential open countryside site locations sufficient to satisfy all reasonable foreseeable future housing needs. See for example the requirements mentioned in para. 6 above. In this sense context Grazeley is untested and therefore premature.</p>
West Waddy ADP for Gerald Palmer Eling Trust	The list of evidence to be collected as part of the preparation of the Local Plan Review needs to include the Settlement Boundary Review as the Council is committed to undertaking this study in the West Berkshire Local Plan Review to 2036 Scoping Report as

Respondent	Summary of Response
	<p>outlined in the response to question 1 above and also in the Housing Site Allocations DPD (adopted May 2017) which stated in paragraph 1.35 that:  <i>'All settlement boundaries, including those below the settlement hierarchy, will be reviewed through the new Local Plan.'</i>            It is also a critical piece of the evidence base for determining where housing development should go.</p>
Joy Schlaudraff	<p>Yes, in general. It does not take enough notice of national or global concerns over housing provision. It needs to be more proactive regarding enabling all suitable development, more realistic, less historic, there's no reason why historic buildings can't be conserved and enhanced within semi-rural and urban environments, as much as rural environments. Housing is basic to all. If there is not housing, people can not prosper, in ANY way</p>
Woolf Bond Planning for Donnington New Homes	<p>We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.</p>
Pegasus Planning Group for Donnington New Homes	<p>Yes – the baseline data collected in Appendix 2 covers all the relevant areas, and is appropriate to the West Berkshire Local Plan Review.</p>
Environment Agency	<p>Please be aware that you can get flood risk data from us at <a href="mailto:enquiries_THM@environment-agency.gov.uk">enquiries_THM@environment-agency.gov.uk</a></p>
Mid & West Berks Local Access Forum	<p>As far as we are aware but we note that there are a number of documents listed which we were not aware of &amp; have not read. We note, and approve of, the frequent references to green infrastructure, access to quality green space, and its importance to health and well-being.</p> <p>For example, we endorse the comments:</p> <ul style="list-style-type: none"> <li>- page 81 <i>'Planning therefore has some influence for enabling good mental health and wellbeing through helping to create access to quality green space, ....'</i></li> <li>- page 102 on Green Infrastructure the need for 'Interconnecting GI assets to form a strong GI network of green spaces and corridors which deliver the range of GI functions'</li> </ul> <p>We are a little unclear what the main purpose of Green Infrastructure is. Is it for the human population or to enhance wildlife? Biodiversity seems to be covered in its own right. Thus we advise that the main purpose of Green Infrastructure should be to provide benefits for the human population to encourage healthy outdoor activities and active travel.</p> <p>We note that it is planned to include CS12 Equestrian/ Racehorse Industry in the new plan but there does not appear to be any baseline data to support this. We understand that the horse industry contributes significantly to the national and West Berkshire economy and a significant amount of land is used by the industry. Data needs to be collected. See the submission by the British Horse Society.</p>
British Horse Society	<p>There is little baseline data included to support the inclusion of the Equestrian / Racehorse Industry (commonly called the Horse Industry).</p>

Respondent	Summary of Response
	<p>The BHS was very pleased to see the Horse Industry recognized in CS12 in the current plan. It strongly believes that the horse industry must be included in local development plans and very much hopes that the new plan will be even stronger on equestrian issues. The BHS has used the current West Berks development plan as an example to other local authorities.</p> <p>I was not involved in drawing up the current West Berks Local Development Plan and am unaware of the data which may have been collected to support the inclusion in the current plan.</p> <p>The non-racing horse industry (as well as the horse racing industry) makes a significant contribution to the economy, to employment, land use &amp; leisure activities in West Berks and to the health &amp; well-being of a wide age range of the population.</p> <p>Please note that my role within the British Horse Society (BHS), is as an Access and Bridleways officer for West Berks and southern region (Berks, Bucks, Hants, IOW, Oxon). We receive training for this role but we are volunteers. The BHS does not have planning officers and it often falls on its access &amp; bridleways officers to respond to development plans</p> <p>Nationally, the horse industry is recognized as a significant land based industry and West Berkshire is no exception. The equine industry is not just made up of the horse racing industry. It consists of professional, semi-professional and recreational riders (see pages 10 &amp; 11 in A report of research on the Horse Industry in Great Britain <a href="https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain">https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain</a>). Economic activity centres around educational establishments, livery yards, veterinary practices, farriers, forage suppliers and small parcels of land rented for the keeping of horses who may be primarily pets. There is considerable land use for livery yards which are small businesses and an important example of farm diversification scattered all over West Berkshire. In addition there are a number of equestrian centres which offer training and education. These activities need to be recognized and policies developed to support them in all local plans, from the construction of riding arenas, stabling and inclusion of provision for horses in the construction of new public paths / bridleways / green infrastructure</p> <p>With reference to the consultation document:</p> <ol style="list-style-type: none"> <li>i. the horse Industry contributes to ‘Communities and Well Being’ and ‘Economy and Infrastructure’ listed on page 9.</li> <li>ii. We are pleased to see on page 102 the need for improved equestrian access. We fully endorse this and believe the Mid &amp; West Berks Local Access Forum also supports this.</li> <li>iii. Under Future trends on pages 102 /103, <i>‘Focusing and prioritising GI investment on economic growth points where the majority of people will be located in the future to deliver multiple GI benefits’</i>, we would like to point out that there needs to be mention here on where horses are kept / where there are equestrian establishments which is often <b>not</b> where people live. We suggest an amendment along the lines of <i>‘Focusing and prioritising GI investment on economic growth points where the majority of people will be located and where there is an economic or recreational need in the future to deliver multiple GI benefits.’</i> This assumes that GI means, or includes, the provision of off-road paths, public open space etc and not just wild-life corridors with some public access. The well-being of the human population needs to be fully recognized and the contribution of the horse to human well-being recognized.</li> <li>iv. The Equestrian / Racehorse industry (horse industry) should be mentioned under ‘Rural economy and rural infrastructure’. Equestrianism uses a significant amount of the grazing land nationally and the same is likely to be true in West Berks.</li> </ol>

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q3: Do you have, or know of, any additional baseline data which should be added to that already listed?

Number of responses received: 21

Respondent	Summary of Response
Francis Connolly	Not to my knowledge
Ian Campbell	<p>DEFECTIVE DATA? In my comments on Question 1 above I list several omissions in the Local Plan. As this Local Plan does not provide sufficient building land to return house prices over a long period to historic normal levels this conclusion suggests the data used in the Plan preparation is not adequate.</p> <p>You list the West of Berkshire Spatial Planning Framework as one of the relevant documents. It contains two errors</p> <p>ERROR 1. It is not sustainable as it fails to put forward a strategy for a sustainable period of time in the future. In a growth area like West Berkshire a sustainable period of time must extend far beyond 2036.</p> <p>ERROR 2. It promotes a urban settlement in the countryside of 15,000 new homes. The choice of this location is a response to a commercial initiative by a consortium of land owners and builders to build on a site of their, not the four councils choice. The adoption of this land is not the result of a rational approach to a site identification exercise assessing all other sites which may be equally suitable. Without first obtaining independent verification how do the four councils know Grazeley is the right location? This is not possible without the right evidence.</p> <p>UNTESTED My submission to you dated 14 January 2014 (Para. 18) said the basis of selection of countryside sites seemed crude. The new draft Local Plan does not explain the rationale for selecting open countryside sites. Unhappily there is no reason to alter this description. This exclusion is a particular concern relating to the Grazeley option, because a settlement here sets a historic precedent. It will establish the pattern for further growth in the decades after 2036. If the correct long term approach to solving the Thames Valley housing crisis is a major new settlement or urban extension in the open countryside it is especially important that the search area and the criteria for selection the location have proper regard to the long term, sustainability score of all other potential open countryside site locations sufficient to satisfy all reasonable foreseeable future housing needs. See for example the requirements mentioned in para. 6 above. In this sense context Grazeley is untested and therefore premature.</p>
West Waddy ADP for Gerald Palmer Eling Trust	Yes, the results of the Settlement Boundary Review, which is still to be undertaken, for the reasons given in the responses to questions 1 & 2.
Natural England	Baseline data with more of a specific focus around development pressures within the AONB (e.g. with regards to numbers and percentages of housing and other non-housing related planning applications coming forward within the AONB and outside of it) could be integrated into the SA scoping in order to clearly understand the baseline with regards to development within this protected landscape.

Respondent	Summary of Response
Joy Schlaudraff	Yes. There are many unidentified sites, because there are no free or cheap assessments by the council
Woolf Bond for Donnington New Homes	We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.
Pegasus Planning Group for Donnington New Homes	No – I am not aware of any additional baseline data which should be added to that listed.
Stratfield Mortimer Parish Council	<p>Not being expert in any of the fields mentioned, it is difficult to say that a precise piece of data has not been used. However, it is clear that the following issues do not appear to be covered by any of the data listed:</p> <p><b>Population</b></p> <ul style="list-style-type: none"> <li>• While the fact of an ageing population is covered it would seem that there is no data on what such a population would like to see happen. For instance they might seek to down-size at a particular point in life. Are there no such attitude surveys?</li> <li>• This is a general point about all the issues. There seems to be little or no information on what people actually want, now or in the future, as opposed to simply extrapolating existing statistics.</li> </ul> <p><b>Health</b></p> <ul style="list-style-type: none"> <li>• There is virtually nothing in this section about mental health</li> <li>• There seem to be a mix of value judgements and statistics that reduce the section's impact.</li> <li>• There does not seem to be any information on NHS and other health providers plans</li> <li>• There is little or no background on trends in delivery of medical services such as the use of remote monitoring of conditions</li> <li>• There is very little on the impact of environmental conditions on health or indeed cross-referencing to other issues</li> <li>• Again this last issue is prevalent through all of this appendix</li> </ul> <p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• Should there not be a data set on health and air quality?</li> </ul> <p><b>Education</b></p> <ul style="list-style-type: none"> <li>• There is no mention of changing educational practices such as internet learning</li> <li>• There is no mention of apprenticeships and this route to qualifications</li> <li>• There is no mention of the need to retrain for different jobs as the 'job for life' disappears.</li> <li>• In general terms this section confines itself to those educational needs that are met, in some way, by WBC and does not take a more wide-ranging view.</li> <li>• There is little or no cross referencing to other sections where education is important such as Health</li> </ul> <p><b>Housing</b></p>

Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• There does not seem to be any data on housing construction such as the increasing use of factory built homes.</li> <li>• Nor does there seem to be any data on the type of buildings required to minimise the environmental footprint of housing</li> <li>• Little cross-referencing to other issues such as flooding</li> </ul> <p><b>Deprivation</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Crime</b></p> <ul style="list-style-type: none"> <li>• No mention is made of the national crime survey where individuals are asked about their experiences of crime in the last year. This gives a different picture to police crime statistics. Indeed police crime trend figures are well known to be suspect as the basis for recording has changed over time.</li> </ul> <p><b>Sport</b></p> <ul style="list-style-type: none"> <li>• Mortimer has commissioned a consultant to report on sport in and around the parish and this can be made available if required.</li> <li>• There are no figures showing the correlation between sporting activity and health, especially for the older members of society</li> <li>• While this section is entitled community sport and leisure facilities there is no real mention of leisure facilities which, presumably, would include everything from pubs to cinemas.</li> <li>• There is no mention of the myriad of clubs that cater for specific interests from gardening to chess.</li> <li>• There is no mention of informal leisure facilities such as recreation grounds and open countryside</li> </ul> <p><b>Landscape</b></p> <ul style="list-style-type: none"> <li>• There is no mention of landscape as an aid to better health</li> <li>• The characterization of landscape into the very broad categories does not do justice to the very varied landscapes held within each category</li> <li>• There is a presumption that this only concerns the rural areas. Surely the urban landscape is just as important?</li> </ul> <p><b>Geology</b></p> <ul style="list-style-type: none"> <li>• Would it be appropriate to deal with Hydrology in this section?</li> </ul> <p><b>Historic environment</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Commons</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Biodiversity</b></p> <ul style="list-style-type: none"> <li>• There does not seem to be any information on the overall current state of biodiversity.</li> <li>• The emphasis is all on protected areas and species. It is believed that WBC hold records of species identified in the District.</li> <li>• Should the Lawton report be mentioned?</li> </ul> <p><b>Green Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Should designated Green Spaces be mentioned and how many there are in the District?</li> </ul>

Respondent	Summary of Response
	<p><b>Climate</b></p> <ul style="list-style-type: none"> <li>• There is no mention of the likely impact that climate change will have on health.</li> </ul> <p><b>Water quality and contaminated land</b></p> <ul style="list-style-type: none"> <li>• Should the future trends cross-reference to climate change?</li> </ul> <p><b>Water supply</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Various papers have been published on the impact of short high intensity storms affecting impermeable areas be these man made or simply very dry ground. These intense events can be just short periods of rainfall or intense events within a longer storm. It is considered that these events need to be considered when assessing the sustainability of any policy or proposal.</li> </ul> <p><b>Soil</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Previously developed land</b></p> <ul style="list-style-type: none"> <li>• The future trends section is confusing. If it is saying that brownfield sites may increase in number why would the use of green field sites increase as a result? If this is because of a general decrease in the availability of other windfall sites where is the evidence and is this the correct place to mention it?</li> </ul> <p><b>Minerals</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Waste</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Renewable energy</b></p> <ul style="list-style-type: none"> <li>• There does not seem to be a recognition that in the future there will be increasing need for electricity as renewables provide that form of energy and the use of electric vehicles will put demand on a much higher plane. There is likely to be demand for ancillary facilities as well as generating capacity, for example, large scale electricity storage (battery) plants.</li> </ul> <p><b>Economy</b></p> <ul style="list-style-type: none"> <li>• There is mention of the road network but not the rail network.</li> <li>• There is no mention of broadband provision which is now an exceptionally important determinant of good prospects for the economy of an area.</li> <li>• There is no mention of the problems faced due to increased congestion on all transport networks or the opportunities offered by rail electrification</li> <li>• There is little or no cross-referencing to other sections such as education and health</li> <li>• There seems to be no recognition of how work will change due to greatly increased use of Artificial Intelligence</li> </ul> <p><b>Tourism</b></p> <ul style="list-style-type: none"> <li>• No comment</li> </ul> <p><b>Agriculture</b></p>

Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• It is noticeable that this is the first time that Brexit has been mentioned. In reality might this not affect a number of sections in the analysis?</li> </ul> <p><b>Transport</b></p> <ul style="list-style-type: none"> <li>• There is no mention of the impact of the increasing use of electric vehicles on transport or indeed the use of autonomous vehicles.</li> <li>• The mention of reductions in usage by home working is welcomed but this depends on good access to broadband and this is not mentioned.</li> <li>• There is mention of the encouragement of active transport modes but very little information on the location of this.</li> <li>• There is little cross-referencing, for instance to the minerals section where the reuse of materials for roads could be important or public rights of way that encourage walking and health.</li> <li>• There is little or no mention of freight transport</li> </ul>
Carter Planning for Mr R.L.A. Jones	No but any future Neighbourhood Plans will need to be included
Burghfield Parish Council	No
Burghfield NDP Steering Group	No
North Wessex Downs AONB	No. Although Horse racing industry is an important sector of West Berkshires economy and data from this could be incorporated if viable.
Turley for North East Thatcham Consortium	<p>With regards to the SA Process beyond this Scoping Report, the Consortium acknowledges that the Council will be updating its evidence base in support of the Local Plan Review and therefore assumes that West Berkshire Council will amend the baseline data and key sustainability issues in light of any new evidence.</p> <p>The Consortium's response to Question 2 above has highlighted a number of new sources of baseline data which are considered to be helpful to the SA Process. These are:</p> <ul style="list-style-type: none"> <li>• The latest evidence on West Berkshire's economy and the conclusions of the Economic Development Needs Assessment (EDNA)</li> <li>• The Reading Pre-Submission Local Plan (2017) and particularly paragraph 4.4.12 which states the need for greater number of family housing within the Western Berkshire HMA.</li> </ul>
Pro Vision for Audley Group	<p>Particularly in the context of West Berkshire's ageing population being above the national average, it would be appropriate to include reference to the following House of Commons report published last month:  <i>Housing for Older People, Second Report of Session 2017-19; Communities and Local Government Committee (5 February 2018).</i></p>

Respondent	Summary of Response
Woolf Bond Planning for Donnington New Homes	We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.
Pegasus Planning Group for Donnington New Homes	No – I am not aware of any additional baseline data which should be added to that listed.
Archaeology Team West Berkshire Council	Another form of primary evidence we use is LiDAR data supplied by the Environment Agency – work by the Council's GIS team has turned this into Hillshade models available on corporate mapping. This display both surface and terrain topography and is valuable for many areas (eg for flooding assessments) as well as for our purposes in identifying archaeological earthworks.
Transport Team West Berkshire Council	<p>In addition to the telephone information service (Traveline) for bus times that is referenced in Appendix 2, in line with the Local Transport Plan Policy on Information, through partnership working with Reading Transport Limited, live local bus information is also available via Traveline's NextBuses mobile internet and text service, and via Traveline South &amp; East's and individual transport operators' apps (e.g. the free 'Kennections' app). Service status and disruption updates are also now available via social media, including via Twitter feeds integrated into apps.</p> <p>Further, Reading Transport have now taken on the maintenance of nine on-street audio-visual screens at bus stops served by their routes, and are currently working with the Council to introduce audio-visual information on board the Kennections local bus fleet.</p> <p>During 2017, local bus services were enhanced with the introduction of contactless bankcard payment and mobile ticketing on routes radiating from Newbury operated by Kennections (under contract to WBC), by Reading Buses, and by Stagecoach South. GWR are also introducing contactless payment to their ticket machines at key stations including Newbury.</p>
Mid & West Berks Local Access Forum	Not that we are aware of but see answer to Q2.
British Horse Society	<p>Up-to-date data specific for West Berks may be difficult to obtain. National data on the importance of the Horse Industry is more readily available although some of it is rather out of date.</p> <p><b>West Berks-Specific data:</b></p> <p><b>1. The National Equine Database / Central Equine database.</b></p> <p>In theory, this should allow an estimate of the economic value of the horse industry to be calculated in West Berks. Further information may be available via <a href="https://data.gov.uk/dataset/national-equine-database-ned">https://data.gov.uk/dataset/national-equine-database-ned</a></p> <p>Legally, every horse has to have a passport. In the past, the number of passports by postcode was available from the National Equine database. Data obtained by the Society in 2011 showed that 16,711 horses were registered with RG postcodes. The British</p>

Respondent	Summary of Response
	<p>Equestrian Trade Association (see below) estimated that in 2015 each horse costs £3,600 pa to keep. Thus, the economic value of horses kept in RG postcodes equated to <u>£60 million per annum</u> at that time period. Others claim the BETA figure is an underestimate.</p> <p>The National Equine Database was discontinued and as far as we are aware up-to-date figures are not available to the public. The Society understands that a Central Equine Database is planned but has little information about it.</p> <p>It might be worth West Berks Council asking Defra for advice on how it should calculate the economic value of the horse industry in West Berks. Also it might be worth contacting the CEO at the BHS Headquarters: The British Horse Society, Abbey Park, Stareton, Kenilworth, Warwickshire, CV8 2XZ</p> <p><b>2. Conduct a survey / snapshot of equestrian enterprises in West Berkshire.</b></p> <p>It may, perhaps, be necessary for the Council to conduct a survey /snapshot of non-racing equestrian enterprises in West Berkshire to gain an estimate of the size of the horse industry.</p> <p>There are numerous enterprises throughout West Berks which contribute to the equestrian economy. These include: equestrian centres, livery yards, veterinary practices, farrier services, forage suppliers etc. ( see below, National data 2a below for the range of the horse industry nationally).</p> <p>For example,</p> <p>(i) there are at least 4 large equestrian <b>veterinary practices</b> in West Berks. These might be a source of the number of horses kept to owners with West Berks postcodes.</p> <p>(ii) a ridden horse will usually be shod by a <b>registered farrier</b> every 5-8 weeks. The number of registered farriers in West Berks might be available from the Farriers Registration Council and an estimate of the average number of horses on each farriers' books obtained. Both these are likely to give an under estimate of the number of horses kept in West Berks but may serve as an estimate.</p> <p>(iii) <b>Licensed riding schools:</b> these may seriously underestimate the horse population if they do not include livery yards and private premises</p> <p>3. For the <b>importance / economic value of horse racing in West Berks</b>, the British Horse Racing Board may be a source of information.</p> <p><b>National data:</b></p> <p>We are aware of the following:</p> <p>1. <b>British Equestrian Trade Association's National Equestrian Survey 2015</b>  <a href="http://www.beta-uk.org/pages/industry-information/market-information.php">http://www.beta-uk.org/pages/industry-information/market-information.php</a>  Taken from the website: <i>'This highlights new spending patterns and changing trends over the past five years to provide an insight into the equestrian sector today. Key findings include: Nationally, the economic value of the equestrian sector stands at £4.3 billion of consumer spending across a wide range of goods and services each year. This has increased from £3.8 billion in 2011. <b>Riding for pleasure, at 96%, was the most popular equestrian activity, with 59% of riders taking part in non-affiliated competitions.</b>'</i></p> <p>It may be that BETA may have data specific to West Berkshire which it may release on application</p> <p><b>2. British Horse Industry Confederation reports published 2004 /2005.</b></p> <p>a. <a href="https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain">https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain</a>. See the diagrams on pages 10 &amp; 11 which depict the breadth of the Horse industry which also will relate to West Berks.</p>

Respondent	Summary of Response
	<p>b. A summary this report is available at <a href="http://www.ridingsafely.net/defrabhicssummary1.html">http://www.ridingsafely.net/defrabhicssummary1.html</a>. I have a paper copy</p> <p>c. Strategy for the Horse Industry in England &amp; Wales  <a href="https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales">https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales</a></p> <p><b>3. The Health Benefits of Horse Riding</b></p> <p>In 2010, the BHS commissioned the University of Brighton, in partnership with Plumpton College, to research the physical health, psychological and well-being benefits of recreational horse riding in the United Kingdom. The report is available at <a href="http://www.bhs.org.uk/enjoy-riding/health-benefits">http://www.bhs.org.uk/enjoy-riding/health-benefits</a></p> <p>4. <a href="https://www.lantra.co.uk/">https://www.lantra.co.uk/</a> may have useful data.</p> <p>It should be noted that the agriculture data provided by Defra is unlikely to include equestrian activities as most horses in the UK are not classified as an agricultural animal. However, many farms have diversified into livery yards (places where horse owners pay to keep their horses often on a DIY basis) and the income from this is a source of income. The livery costs range from around £200 to £800 a month per horse.</p>

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q4. As far as you are aware, are there any inaccuracies or anomalies in the data presented?

Number of responses: 17

Respondent	Summary of Response
Stratfield Mortimer Parish Council	No apart from the lack of cross-referencing and surveys of public opinion of the existing situation and their aspirations.
Carter Planning for Mr R.L.A Jones	No.
Burghfield Parish Council	No
Burghfield NDP Steering Group	No
North Wessex Downs AONB	No
Turley Associates for North East Thatcham Consortium	Other than the comments presented above, the Consortium has not identified any specific inaccuracies or anomalies however it is noted that some of the baseline data sources were utilised in support of the adopted Core Strategy and therefore we fully support the Council's commitment to a new and revised evidence base as part of the development of the Local Plan Review
Woolf Bond Planning for Donnington New Homes	We agree that the baseline data is appropriate, however would suggest there may be benefit in separate additional studies considering the benefits of allocating smaller sized sites adjacent to smaller sized settlement as a potential strategy for aiding housing delivery in accordance with the referenced draft NPPF paragraphs. We also consider a detailed review of affordable housing need, specific to West Berkshire District may assist.
Pegasus Planning Group for Donnington New Homes	No – I am unaware of any inaccuracies or anomalies in the data.
Archaeology Team West Berkshire Council	I believe the historic environment section is reasonably accurate – but NB the HER is continually being updated.
Public Transport Team West Berkshire Council	No
Francis Connolly	Not to my knowledge

Respondent	Summary of Response
Ian Campbell	<p>DEFECTIVE DATA? In my comments on Question 1 above I list several omissions in the Local Plan. As this Local Plan does not provide sufficient building land to return house prices over a long period to historic normal levels this conclusion suggests the data used in the Plan preparation is not adequate.</p> <p>You list the West of Berkshire Spatial Planning Framework as one of the relevant documents. It contains two errors</p> <p>ERROR 1. It is not sustainable as it fails to put forward a strategy for a sustainable period of time in the future. In a growth area like West Berkshire a sustainable period of time must extend far beyond 2036.</p> <p>ERROR 2. It promotes a urban settlement in the countryside of 15,000 new homes. The choice of this location is a response to a commercial initiative by a consortium of land owners and builders to build on a site of their, not the four councils choice. The adoption of this land is not the result of a rational approach to a site identification exercise assessing all other sites which may be equally suitable. Without first obtaining independent verification how do the four councils know Grazeley is the right location? This is not possible without the right evidence.</p> <p>UNTESTED My submission to you dated 14 January 2014 (Para. 18) said the basis of selection of countryside sites seemed crude. The new draft Local Plan does not explain the rationale for selecting open countryside sites. Unhappily there is no reason to alter this description. This exclusion is a particular concern relating to the Grazeley option, because a settlement here sets a historic precedent. It will establish the pattern for further growth in the decades after 2036. If the correct long term approach to solving the Thames Valley housing crisis is a major new settlement or urban extension in the open countryside it is especially important that the search area and the criteria for selection the location have proper regard to the long term, sustainability score of all other potential open countryside site locations sufficient to satisfy all reasonable foreseeable future housing needs. See for example the requirements mentioned in para. 6 above. In this sense context Grazeley is untested and therefore premature.</p>
West Waddy ADP for Gerald Palmer Eling Trust	No
Joy Schlaudraff	<p>Yes.</p> <p>Paragraph 55 of the current nppf, lends great scope to West Berkshire. More notice should be taken of it, its spirit for all developments, not just single dwellings. This was not the point of the paragraph spirit.</p> <p>Paragraph 95 of draft nppf, and all the new draft nppf, should be given great weight.</p> <p>It updates us all with the real needs of real people; historic landscape character is all very well, but we need to house people. The land is for the people, not the people for the land</p>
Mid & West Berks Local Access Forum	Not that we are aware of but we are not familiar with a number of the documents listed.
British Horse Society	Not as far as the Society is aware.

**Responses received to the SA/SEA Scoping Report (February 2018)****Q5: Do you agree that these are the key sustainability issues for the West Berkshire Local Plan Review?**

Number of responses: 21

<b>Respondent</b>	<b>Summary of Response</b>
Stratfield Mortimer Parish Council	Please see response to question 3
Carter Planning for Mr RLA Jones	Yes – the key sustainability issue is future housing needs and how they will be met. Perhaps Housing should be a specific Thematic Topic rather than being part of Communities and Well Being. Housing is the single most important issue and yet the paragraph on it does not specifically refer to overall housing needs being met but concentrates on the more detailed matters of income levels, the size of houses and old persons accommodation.
Burghfield Parish Council	Yes: the key sustainability issues for West Berkshire are covered. However, the statement should be more proactive in identifying and addressing emerging changes to some of these issues. For example in relation to waste management there is now a growing awareness of the environmental damage arising from discarded plastics. Our emerging Local Plan should therefore be seeking to discourage the unnecessary use of plastics, to increase the range of plastics that are recycled, and to seek to contain other waste plastics to ensure that they do not reach, particularly, the marine environment.
Burghfield NDP Steering Group	Yes: the key sustainability issues for West Berkshire are covered. However, the statement should be more proactive in identifying and addressing emerging changes to some of these issues. For example in relation to waste management there is now a growing awareness of the environmental damage arising from discarded plastics. Our emerging Local Plan should therefore be seeking to discourage the unnecessary use of plastics, to increase the range of plastics that are recycled, and to seek to contain other waste plastics to ensure that they do not reach, particularly, the marine environment.
North Wessex Downs AONB	No. Landscape pressure should also include climate change and biodiversity should include flooding.
Turley Associates for North East Thatcham Consortium	The Consortium has reviewed the key sustainability issues within Table 2 of the SA Scoping report and save for the comments provided in Question 6 (below) agrees that (based on the baseline data provided) these represent the key sustainability issues for the West Berkshire Local Plan Review. The Consortium acknowledges that any new baseline data may warrant a further review of the key sustainability issues.
Woolf Bond Planning for Donnington New Homes	We agree these sustainability objectives are appropriate.

Respondent	Summary of Response
Pegasus Planning Group for Donnington New Homes	Yes – these are the key sustainability issues for the West Berkshire Local Plan Review. Specifically, increasing the supply of housing and flood risk should be given considerable weight when considering the key sustainability issues. This is because they have been given continuing or increased significance in the revised NPPF.
Archaeology Team West Berkshire Council	<p>Under Landscape, Townscape and Cultural Heritage - Landscape – agree with these Historic Character and Features – what is meant by the word ‘features’? It’s not used anywhere else. Should be replaced by ‘Heritage Assets’</p> <p>This text “The conservation of historic, sites and commons, monuments, battlefields, parks, buildings and Conservation Areas has contributed to the historic, cultural, economic heritage of West Berkshire and helped to sustain the distinctive communities in the District” could be improved – change to “Sustainable management of historic sites (monuments, buildings and structures) and landscapes (battlefields, parks and gardens, Conservation Areas) contributes to the social, cultural and economic vitality of West Berkshire and helps to maintain the distinctive communities in the District”</p> <p>We wonder why the paragraph on nuclear safety is included in this section?</p>
Public Transport Team West Berkshire Council	<p>Yes, I agree that the issues identified are the key sustainability considerations for the Review.</p> <p>In respect of “increased availability of transport links” being identified within the SA Scoping Report as a means of addressing rural social isolation, it is vital that stakeholders appreciate the associated financial implications,</p> <p>In relation to Economy and Infrastructure, in parallel with encouraging use of more sustainable transport modes including buses, train, walking and cycling in particular for urban journeys, close consideration should be given to bidding for significant funds (e.g. Major Roads Network funding to deliver wider ranging development of strategic roads, including new links, so as to take inter-urban and long-distance through traffic further away from West Berkshire’s main settlements, thereby reducing the environmental impact for the District.</p>
Francis Connolly	<ul style="list-style-type: none"> <li>• Generally yes</li> <li>• The Grazely area proposals for 15,000 new homes should be investigated for further development for say up to 25,000 new homes. Cognisant of the good transport links including public transport, (rail and fast bus)</li> <li>• Greater commitment to affordable and starter homes with guarantees on delivery</li> </ul>
Hampshire County Council	We agree that the issues outlined in Appendix 2 are key sustainability issues for the West Berkshire Local Plan Review.
Ian Campbell	Community wellbeing is given as the first sustainable thematic topic. You mention there are a number of factors that are important to enable everyone to fully participate in society, which impact on the housing issue. In particular an ageing population is identified as an issue, with the over 65’s forecast to grow by 59% in the period 2016-2036 and the over 85’s by 148% in the same period, both above the national average. The Plan points to a much increased demand for suitable housing bearing in mind the wish of these age groups to retain independence. It also highlights the impact of the house prices being now amongst the highest in the UK for key

Respondent	Summary of Response
	<p>occupational workers. Finally the Plan notes the high dependency on private transport and the implications of a car dependency on emissions and air quality.</p> <p>SHORT-SIGHTED. This analysis high lights trends in house prices and transport but makes no attempt to quantify any of the outcomes at the end of the Plan period in 2036. What will prices be in 2036? This is a gap. It also fails to look further ahead by another 20 or 40 years to the 2080's. From a sustainability perspective this is a big hole in shrewd thinking.</p> <p>LIMITATIONS It is certain that most predictions in the Plan will be wrong. This is not a criticism. It is a reflection on incomplete base data, and changing circumstances. The prudent way forward is to plan for a range of outcomes, not one selected outcome. Which is why a sustainable local plan must look much further ahead. It must look at long term trends, and solutions. For example 60year potential housing locations and the infrastructure they will demand if dependency on private cars is to be significantly constrained. These long term perspectives are omitted. They are the essence of sustainable planning. If their inclusion exceeds the council's authority then the Council must notify the Government its housing aspirations cannot be achieved without new local powers. Ignoring the dilemma, or hoping that they can be delivered is not sufficient. Other councils are grappling with these challenges. West Berkshire's approach is not apparent. (See Planning Resource, How a group of Oxfordshire councils secured £215m. of government infrastructure cash; 8 February 2018; by Stuart Watson).</p>
Thatcham Town Council	Yes
West Waddy ADP for Gerald Palmer Eling Trust	<p>Yes, particularly the comment on housing, which states that:</p> <p><b><i>'Housing: The higher than average annual income, and house prices now amongst the highest in the UK, have particularly affected key occupational workers and potential first time buyers who are unable to get onto the property ladder. The lack of smaller sized as well as affordable dwellings for predicted lower density households is an issue for the future, particularly in relation to rural areas and in retaining younger local people employed in the District. The increasing number and proportion of older persons and those with long term needs places more demand for housing and accommodation that is available and/or adaptable for different stages of life.'</i></b></p> <p>This emphasises the importance of making housing provision in rural areas particularly for occupational workers; first time buyers and affordable housing. A key tool in identifying how this can be done will be the Settlement Boundary Review, which is still to be undertaken and therefore needs to be a priority.</p>
Joy Schlaudraff	<p>Yes, but there is far too much emphasis on key point 1 which is blocking nearly all development. This needs to be taken away or highly trimmed.</p> <p>Key point 2 is much more to the point regarding current day needs. (Enable provision of housing in sustainable locations, and reduce inequality)</p>
Woolf Bond Planning for Donnington New Homes	We agree these sustainability objectives are appropriate.
Pegasus Planning Group for Donnington New Homes	Yes – these are the key sustainability issues for the West Berkshire Local Plan Review. Specifically, housing for an aging population, increasing the supply of housing, culture (tourism), community uses, and green infrastructure should be given considerable weight

Respondent	Summary of Response
	when considering the key sustainability issues. This is because they have been given continuing or increased significance in the revised NPPF.
Environment Agency	For the above question you should consider adding in another sustainability issue which is conservation and enhancement of river corridors which includes their ecological buffer zones from the top of the river bank. These are usually 8-10 metres in width.
Mid & West Berks Local Access Forum	Yes, they seem appropriate. We particularly endorse the frequent reference to the importance of well-being and the role of green infrastructure. Green Infrastructure might be strengthened by making it an objective in its own right rather than combining it with Biodiversity. The health of the human population is of high significance and the importance of healthy outdoor exercise is increasingly being recognized.
British Horse Society	Yes, they seem appropriate. We note reference to equestrian sporting prowess under ' <b>Landscape, Townscape and Cultural Heritage</b> ' and draw your attention to points above on how data might be collected, if required.

**Responses received to the SA/SEA Scoping Report (February 2018)****Q6: Are you aware of any issues which, in your opinion, should be added, or any that should be removed?**

Number of responses received: 19

Respondent	Summary of Response
Francis Connolly	<ul style="list-style-type: none"> <li>• The Greater Reading Area (West Berks, RBC and Wokingham BC) development should be planned comprehensively</li> <li>• South Newbury development should also consider the adjacent North Hampshire area.</li> </ul>
Ian Campbell	<p>Community wellbeing is given as the first sustainable thematic topic. You mention there are a number of factors that are important to enable everyone to fully participate in society, which impact on the housing issue. In particular an ageing population is identified as an issue, with the over 65's forecast to grow by 59% in the period 2016-2036 and the over 85's by 148% in the same period, both above the national average. The Plan points to a much increased demand for suitable housing bearing in mind the wish of these age groups to retain independence. It also highlights the impact of the house prices being now amongst the highest in the UK for key occupational workers. Finally the Plan notes the high dependency on private transport and the implications of a car dependency on emissions and air quality.</p> <p>SHORT-SIGHTED. This analysis high lights trends in house prices and transport but makes no attempt to quantify any of the outcomes at the end of the Plan period in 2036. What will prices be in 2036? This is a gap. It also fails to look further ahead by another 20 or 40 years to the 2080's. From a sustainability perspective this is a big hole in shrewd thinking.</p> <p>LIMITATIONS It is certain that most predictions in the Plan will be wrong. This is not a criticism. It is a reflection on incomplete base data, and changing circumstances. The prudent way forward is to plan for a range of outcomes, not one selected outcome. Which is why a sustainable local plan must look much further ahead. It must look at long term trends, and solutions. For example 60year potential housing locations and the infrastructure they will demand if dependency on private cars is to be significantly constrained. These long term perspectives are omitted. They are the essence of sustainable planning. If their inclusion exceeds the council's authority then the Council must notify the Government its housing aspirations cannot be achieved without new local powers. Ignoring the dilemma, or hoping that they can be delivered is not sufficient. Other councils are grappling with these challenges. West Berkshire's approach is not apparent. (See Planning Resource, How a group of Oxfordshire councils secured £215m. of government infrastructure cash; 8 February 2018; by Stuart Watson).</p>
Thatcham Town Council	<p>Inclusion of 'Provision for Young People' as a sustainability issue  'Affordable Housing' as a separate issue that is distinct from wider 'Housing'  'Flood Risk' to also incorporate 'Flood Prevention'</p>
West Waddy ADP for Gerald Palmer Eling Trust	No

Respondent	Summary of Response
WYG for Donnington New Homes	<p>Donnington New Homes is supportive of the approach set out in the Sustainability Appraisal Scoping Report and considers that the objectives and issues which have been identified, provide an appropriate way in which to assess the sustainability of policies and proposals in the new local plan. In particular, SA Objectives 1 (to enable the provision of housing to meet identified need in sustainable locations) and 4 (to promote and maximise opportunities for all forms of safer and sustainable travel) are welcomed. Table 2 identifies Key Sustainability Issues for the district. These include specific housing pressures including an ageing population, affordability and the way in which the high cost of housing will result in problems with staff recruitment and retention, affecting not only the local economy but also the vitality and vibrancy of the district</p> <p>Table 2 also identifies that a sustainable transport system can have both economic and environmental benefits. It is believed that the proposed urban extension at Sandleford Park South can make an important contribution to addressing these issues and meeting the SA Objectives. The development of Sandleford Park, as set out in adopted policy CS3 and the Sandleford Park SPD and now being brought forward by planning applications submitted in March 2018, will deliver up to 1,500 new homes and support a range of options for sustainable travel. These include footpaths and cycle routes as well as the phased provision of bus services, ultimately routing through the site from Monks Lane to Andover Road.</p> <p>The proposed southern extension to Sandleford Park will help deliver up to 500 additional homes in a sustainable location, maximising opportunities for sustainable travel and helping meet the objectives proposed in the SA Scoping Report. Its allocation will also mean that about 2,000 dwellings will be delivered at Sandleford Park. <i>[Please see attached document for further details of the site]</i></p>
Joy Schlaudraff	<p>Yes ! See above question 5. What has been termed a key sustainability issue, isn't in fact a sustainability issue. It is an issue of the historic landscape and non-built environment.</p> <p>However, if small major development (between 25-50 houses) were allowed, on all suitable sustainable location sites, in close proximity to Rural Service Centres eg Burghfield Common and Theale, this would sort the housing crisis, before it overcomes us. If looked into many of these sites are, in fact, suitable for development. We just don't like change. Once its happens, we'll adjust to it.</p> <p>If we don't make some areas now semi-rural in development, the housing crisis will overtake us, and we could end up with urban environments, instead of more balanced semi-rural ones, where there is a good balance between nature and houses, with houses in beautiful surroundings. What not to like?</p> <p>Paragraphs 80 – 85 of the new draft nppf, should be given great weight</p>
Woolf Bond Planning for Donnington New Homes	We agree these sustainability objectives are appropriate.
Pegasus Planning Group for Donnington New Homes	No – I am not aware of any issues that should be added or removed.
Environment Agency	For the above question you should consider adding in another sustainability issue which is conservation and enhancement of river corridors which includes their ecological buffer zones from the top of the river bank. These are usually 8-10 metres in width.

Respondent	Summary of Response
Julian Worth	As indicated in response to Qu1, mineral extraction, which impacts significantly on the subjects considered in the Local Plan, notably landscape and water. In general, extraction in new areas should be opposed - alternative sources of aggregates are available, notably through the Theale rail depots, and despoilation of West Berks can be avoided by making greater use of these alternatives
Stratfield Mortimer Parish Council	Please see response to question 3. In particular the need to include other infrastructure requirements such as good broadband and those associated with quickly changing transport trends such as electric and autonomous vehicles. The inclusion of more social attitude surveys would help identify what people actually want as opposed to simply extrapolating existing trends.
Carter Planning for Mr R.L.A. Jones	No.
Burghfield Parish Council	One of the biggest local issues we currently face is the low proportion of affordable housing being constructed, in part because developers are able escape from their responsibilities by claiming lack of viability. This problem needs to be urgently addressed with central Government.
Burghfield NDP Steering Group	One of the biggest local issues we currently face is the low proportion of affordable housing being constructed, in part because developers are able escape from their responsibilities by claiming lack of viability. This problem needs to be urgently addressed with central Government. We should also seek to address the issue of sustainability in the longer term. We can not go on allocating additional land for housing and other development every few years. We need to work locally and nationally to find a way of curbing the need for continuing to build on agricultural and other greenfield land.
North Wessex Downs AONB	Green Infrastructure should not simply be about new routes/links it should also focus on improving existing routes and links within both rural and built environments, such as the river corridor/canal.
Turley for North East Thatcham Consortium	<p>The Consortium considers that the following amendments and additions to the key sustainability issues should be undertaken by West Berkshire Council which, in turn, should result in policies that secure greater economic, social and environmental benefit:</p> <ul style="list-style-type: none"> <li>• Communities and Well Being (Education/ Skills) – There is an acute need for additional Primary and Secondary School places within Newbury and Thatcham</li> <li>• Communities and Well Being (Housing) - In addition to a significant need for both private and affordable housing there is also a greater need for the provision of family housing within West Berkshire as a result of Readings provision of a greater number of flats</li> <li>• Communities and Well Being (Deprivation) – There is a need to positively address the areas of deprivation within the District with an opportunity in Thatcham and Newbury for new development to provide long term benefits</li> <li>• Communities and Well Being (Community Facilities) – There is a need to ensure appropriate community and leisure facilities are provided across West Berkshire in line with projected growth of both housing and the economy.</li> </ul>

Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• Climate Change and Resource Efficiency (Climate Change) – Significant reductions in Greenhouse Gas emissions can be secured through the location of major new development in sustainable locations which include those that provide the most opportunity for the use of sustainable modes of transportation.</li> <li>• Economy and Infrastructure (Employment Land) – Recent evidence indicates a need for the provision of employment land which in combination with growth in housing could result in an increase in commuting within the District through more sustainable modes of transportation</li> <li>• Economy and Infrastructure (Sustainable Transport) – To reduce reliance on the private car, development should be located in areas whereby key services, facilities and employment opportunities are accessible by sustainable modes of transportation such as train, bus, cycling and walking.</li> </ul>
Planning Transport Team West Berkshire Council	No
Mid & West Berks Local Access Forum	It must be recognized that development should not compromise existing 'green infrastructure' without replacement of green infrastructure which is equivalent or better than existing (see the MWBLAF policy above). Focussing on where people live is reasonable but bear in mind that green infrastructure needs to be preserved and improved from where people take exercise which is not necessarily where they live, eg. to public open spaces, such as commons, where many dogs are exercised; from equestrian livery yards where horses are kept. Integration of off-road access within and from new developments by the thoughtful provision of off-road paths where they are required, and in the context of existing open spaces and the rights of way network, will help discourage car use to popular sites.
British Horse Society	<p>It is essential that the horse industry is fully recognized, based on sound evidence, as contributing to the economy, leisure &amp; recreation, health and well-being in all the appropriate local plans <b>IF</b> it is to thrive and continue to contribute to the West Berks economy. Plans need to refer to the provision of equestrian accommodation (from professional establishments which offer training, to livery yards and use of individual fields where field shelters may be required) and places to ride including public paths / bridleways and other open spaces. So often, my experience is that inclusion of equestrians, particularly on new paths, has to be fought for with each application or project even though equestrian needs are recognized in the current West Berkshire Active Travel Plan &amp; Local Development Plan. Walking &amp; cycling is automatically catered for as a hopeful means of alternative travel even without evidence that the provision of cycle paths has significantly increased cycling uptake.</p> <p>It should be noted that the urban fringe is a popular place for equestrian establishments because many horse riders live in urban areas and <u>not</u> at the premises where horses are kept. Thus equestrian establishments on the urban fringe can be under threat from housing developments and need protection. A prime example of an establishment close to an urban location is Hall Place Equestrian Centre located in Tilehurst and on the fringe of the population of Reading (<a href="http://hallplaceequestriancentre.co.uk">http://hallplaceequestriancentre.co.uk</a>). Another is the carriage driving centre at Sheldon Farm, Tidmarsh and Celebration Carriages at Poplar Farm, Cold Ash (<a href="http://www.celebration-carriages.co.uk">http://www.celebration-carriages.co.uk</a>). Such establishments need recognition &amp; protection as they contribute to the economy, employment, health &amp; well-being of the human population.</p>

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q7: Are the objectives suitable in the context of the West Berkshire Local Plan Review?

Number of responses received: 19

Respondent	Summary of Response
Francis Connolly	As my answer under question 6 for the area south of M4 J11
Hampshire County Council	Yes, the objectives are suitable in the context of the WBLP Review.
Ian Campbell	<p>The Local Plan seems to set in place a a set of sustainability objectives. This I welcome. The snag is the input data is so massive that the reality is what matters more is what is left out, not what is put in.</p> <p>For example, in (Table 3) the column 'Suggested indicators' for the provision of housing 'to maximise the provision to meet identified (demand) the Plan puts forward the number of housing completions as an indicator.</p> <p>TOO RISKY? The simplistic, rational answer is to give back to owners of the countryside the right to develop their land. Although it is not a solution I support the supply of new homes would rocket up because the scarcity is massive. The obvious consequence is that large parts of the open countryside in West Berkshire will be built over in a random way.</p> <p>If national land protection policies remain in place then the new homes following restoration of development rights will only be built on unprotected land. There is plenty of that in the east and south of the council district. A policy on these lines justifies Grazeley, at least in part. But it also justifies other unprotected land areas in the vicinity too. Untested with like locations Grazeley is premature.</p> <p>As the Plan recognises house prices are too high, it is apparent the remedy lies in the hands of the council. This sequential analysis is ignored in the Plan. Without it the next generation must conclude there is another agenda, which remains unstated.</p> <p>EFFICIENT LAND USE. A second SA Objective (4) is 'to promote and maximise opportunities for all forms of safe and sustainable travel. This is a worthy objective with no teeth. To minimise additional private cars on the public road system additional travel modes of similar appeal must be offered. This can only be viable in new settlements of medium and high densities. The fleeting mention of a new settlement policy does not convince me the council have the understanding, let alone the capacity to deliver such a futuristic outcome. Over a long timescale; over a large area; with suitable cross-border governance in place, a sustainable travel solution becomes realistic. It also fulfils section 7, 'to promote and improve the efficiency of land use. Indeed the benefits will, be overlapping for several indicators.</p>
West Waddy ADP for Gerald Palmer Eling Trust	Yes
Joy Schlaudraff	See above 2 answers. No. The first objective isn't. Its overdone, and out of date. See draft paragraphs 80- 85 of the new draft nppf.

Respondent	Summary of Response
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Pegasus Planning Group for Donnington New Homes	Yes – these objectives appear suitable in the context of the review.
Energy Team West Berkshire Council	<p>Headline Objective 4 talks about maximising the opportunity for all forms of safe and sustainable travel BUT there is no mention of Low Emission Vehicles (LEV) in any of the detail and this is potentially a massive omission in terms of the way in which existing and future UK strategy / legislation / fiscal incentives are focusing on the adoption of low emission vehicles and associated infrastructure. If not under Objective 4 then LEV and associated infrastructure should be considered under Objective 9.</p> <p>Consider whether the first sub-category under Headline Objective 8 (To reduce energy use and promote the development and use of sustainable /renewable energy technologies) could be further split to reflect the relative importance and differences of these areas, and to allow more specific indicators to be adopted, for example:</p> <ul style="list-style-type: none"> <li>a) To reduce Energy Use (reduce KWH),</li> <li>b) Promote the use of new or preferred energy technologies ('Smart' towns)</li> <li>c) Promote the use of renewable energy generation and energy storage</li> </ul>
Stratfield Mortimer Parish Council	<p>As far as the objectives are concerned it could be argued that some of them are contradictory, but this may well be intentional and acceptable. For example, to promote the opportunity for travel may contradict the aim of conserving and enhancing the natural environment.</p> <p>Of more significance is the objective of promoting and maximising opportunities for all forms of safer and sustainable travel. Surely in sustainability terms should not the first action be to minimise the need to travel? Only when a trip is necessary should it be safe and sustainable.</p> <p>Similarly should not the objective about emissions start off with eliminating the need for unnecessary emissions before going any further?</p>
Carter Planning for Mr R.L.A. Jones	<p>Yes. As stated meeting housing needs is considered to be the single most important objective in the District.</p> <p>We support the Number 1 SA Objective being the provision of housing to meet identified needs in sustainable locations.</p>
Burghfield Parish Council	Yes. It is particularly good to see reference to the need to increase energy storage from renewable technologies (page 24) in ways that may become available from current research into battery power and other areas. This should enable us to store energy harvested from solar power and wind for use during periods of darkness and calm conditions, and may thus substantially increase the proportion of the energy we use that is derived from renewable resources.
Burghfield NDP Steering Group	Yes. It is particularly good to see reference to the need to increase energy storage from renewable technologies (page 24) in ways that may become available from current research into battery power and other areas. This should enable us to store energy harvested from solar power and wind for use during periods of darkness and calm conditions, and may thus substantially increase

Respondent	Summary of Response
	the proportion of the energy we use that is derived from renewable resources. One action we could take now would be to provide facilities for charging car batteries in new developments.
North Wessex Downs AONB	Yes, how the objectives will be achieved is another matter.
Turley for North East Thatcham Consortium	The Consortium has reviewed the SA Objectives and notwithstanding our comments in response to Question 8 considers them to be broadly suitable in the context of the West Berkshire Local Plan Review. As stated above, it is possible that the objectives may need amendment following the identification of new baseline data or evidence further into the Local Plan Review process.
Historic England	We are pleased to see the historic environment included in a Sustainability Objective. However, we would prefer a separate objective specifically for the historic environment/ heritage assets – the natural and historic environments are both significant matters in their own right, worthy of separate consideration. There is a danger that conflating the two could mask effects on one or the other. Whether a separate objective or not, reference should be made to the significance/special interest of the historic environment/heritage assets – the significance/special interest is what is important about heritage assets and what should be conserved or enhanced (as well as the asset itself).
	Yes – these objectives appear suitable in the context of the review.
Archaeology Team West Berkshire Council	'To protect, and enhance the built and historic environment including heritage assets' – don't consider that the word built is necessary as this is a sub-set of the historic environment
Mid & West Berks Local Access Forum	They seem so. We particularly support inclusion of objective H 'Green Infrastructure & healthy Living' as a distinct objective.
British Horse Society	Yes

### Responses received to the SA/SEA Scoping Report (February 2018)

**Q8: Are there any other additional objectives that should either be included or are there any that should be removed?**

Number of responses received: 20

Respondent	Summary of Response
Francis Connolly	Not at present
Ian Campbell	<p>The Local Plan seems to set in place a set of sustainability objectives. This I welcome. The snag is the input data is so massive that the reality is what matters more is what is left out, not what is put in.</p> <p>For example, in (Table 3) the column 'Suggested indicators' for the provision of housing 'to maximise the provision to meet identified (demand) the Plan puts forward the number of housing completions as an indicator.</p> <p>TOO RISKY? The simplistic, rational answer is to give back to owners of the countryside the right to develop their land. Although it is not a solution I support the supply of new homes would rocket up because the scarcity is massive. The obvious consequence is that large parts of the open countryside in West Berkshire will be built over in a random way.</p> <p>If national land protection policies remain in place then the new homes following restoration of development rights will only be built on unprotected land. There is plenty of that in the east and south of the council district. A policy on these lines justifies Grazeley, at least in part. But it also justifies other unprotected land areas in the vicinity too. Untested with like locations Grazeley is premature. As the Plan recognises house prices are too high, it is apparent the remedy lies in the hands of the council. This sequential analysis is ignored in the Plan. Without it the next generation must conclude there is another agenda, which remains unstated.</p> <p>EFFICIENT LAND USE. A second SA Objective (4) is 'to promote and maximise opportunities for all forms of safe and sustainable travel. This is a worthy objective with no teeth. To minimise additional private cars on the public road system additional travel modes of similar appeal must be offered. This can only be viable in new settlements of medium and high densities. The fleeting mention of a new settlement policy does not convince me the council have the understanding, let alone the capacity to deliver such a futuristic outcome. Over a long timescale; over a large area; with suitable cross-border governance in place, a sustainable travel solution becomes realistic. It also fulfils section 7, 'to promote and improve the efficiency of land use. Indeed the benefits will, be overlapping for several indicators.</p>
West Waddy ADP for Gerald Palmer Eling Trust	Not that I am aware of.
Joy Schlaudraff	<p>Yes. We should have an objective to do our bit, to help the nation and ourselves supply enough housing.</p> <p>We admit shamelessly that we are one of the UKs most wealthy regions, yet we are appearing to be very selfish in our refusal to put beautiful housing in beautiful surroundings for others, before historic conservation.</p> <p>The first objective should either be removed, or put last on the list of priorities.</p>

Respondent	Summary of Response
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Pegasus Planning Group for Donnington New Homes	Yes – given the value of tourism to the economy, a new objective should be added regarding improving and promoting opportunities for tourism in West Berkshire.
Julian Worth	Reduction and elimination of mineral extraction which is a highly damaging and unsustainable activity
Stratfield Mortimer Parish Council	There does not seem to be an overall vision/objective which puts these objectives in context. Without such a context it is difficult to determine if there are any missing objectives because the totality of the aim of the analysis is not stated. However, even without such an overall objective it is evident that specific objectives concerned with happiness, community spirit and health and wellbeing would start to bring into play the aspirations of individuals and communities. It is considered important that the individuals aspirations are considered as they are the ultimate beneficiaries of good policies.
Carter Planning for Mr R.L.A. Jones	No.
Burghfield Parish Council	There should be a stronger statement under objectives about the importance of maintaining and enhancing the local environment. What at present appears under G. does not quite fill the bill because not all that we might wish to conserve is part of our “local distinctive character and identity”. Perhaps begin this section “To conserve and enhance the distinctive and otherwise desirable features of the built, historic and natural environment.....”.
Burghfield NDP Steering Group	There should be a stronger statement under objectives about the importance of maintaining and enhancing the local environment. What at present appears under G. does not quite fill the bill because not all that we might wish to conserve is part of our “local distinctive character and identity”. Perhaps begin this section “To conserve and enhance the distinctive and otherwise desirable features of the built, historic and natural environment.....”.
North Wessex Downs AONB	No. Objectives should always aim to enhance rather than simply conserve and where possible enhance, each development should provide a net gain to landscape character and biodiversity. Pg 25 last few paragraphs state that impacts on the natural environment are heavily dependent on the siting and type of development, it should also include scale and design. Objective G should include environment in the title
Turley for North East Thatcham Consortium	The Consortium does not consider that any additional objectives are warranted however we do have a number of suggested amendments and additions to the sub-objectives and indicators used to assess the impact upon the SA objective. For ease of reference our suggested amendments are placed here acknowledging that this responds to Questions 8 and 9 and which are as follows:

Respondent	Summary of Response
	<ul style="list-style-type: none"> <li>• <b>SA Objective 1-New Sub objective:</b> The Consortium suggests the inclusion of a new sub-objective as follows; <ul style="list-style-type: none"> <li>○ To locate new development in sustainable locations with access to an appropriate range of services and facilities through sustainable modes of transportation <ul style="list-style-type: none"> <li>▪ Suggested Indicators – Allocation in accordance with the Settlement Hierarchy; Services and Facilities accessible by sustainable modes of transportation such as walking, cycling and public transportation</li> </ul> </li> </ul> </li> <li>• <b>SA Objective 2:– New Sub objective:</b> The Consortium suggests the inclusion of a new sub- objective as follows; <ul style="list-style-type: none"> <li>○ To tackle deprivation and inequality in the District <ul style="list-style-type: none"> <li>▪ Suggested Indicators – Proximity to deprived areas; the use of specific measures to tackle deprivation including employment and training opportunities</li> </ul> </li> </ul> </li> <li>• <b>SA Objective 3- New Indicator:</b> The Consortium suggests the inclusion of a new indicator to measures the success of this SA Objective which is as follows: <ul style="list-style-type: none"> <li>○ Number of new primary or secondary school places provided by the proposed development</li> </ul> </li> <li>• <b>SA Objective 4 – New Indicator:</b> In order to encourage and identify new development in the most sustainable locations the Consortium suggests the inclusion of a new indicator within SA Objective 4 which is as follows: <ul style="list-style-type: none"> <li>○ Percentage of new development within walking or cycling distance of a train station</li> </ul> </li> <li>• <b>SA Objective New Indicator:</b> The Consortium suggests the following indicator <ul style="list-style-type: none"> <li>○ Percentage of new development within walking or cycling distance from an existing town centre</li> </ul> </li> <li>• <b>SA Objective 8 – Amendments to existing indicators:</b> In order to align with national policy for sustainable design and construction and to utilise metrics that allow the assessment of a wide range of development types and sizes, the Consortium suggests the following amendments to the indicators associated with SA Objective 8: <ul style="list-style-type: none"> <li>○ % of commercial buildings meeting either BREEAM Very Good or Excellent standard</li> <li>○ % of energy generated from renewable or low carbon energy sources</li> </ul> </li> </ul> <p>The Consortium considers that the amendments below will allow for a more effective implementation of the SA Framework for both policies and proposed allocations however we reserve the right to make further comments once we have reviewed the methodology deployed to update the Settlement Hierarchy and carry out the assessment of each proposed allocation. Key to SA objectives 1 and 4 are the distances utilised to measure the sustainability of a proposed location with respect to key services and facilities. It is also appropriate to acknowledge the potential benefits of multi-modal travel which may involve a short walk to a bus stop and then a longer journey to a key destination but which can be regarded as a sustainable travel choice. Within the SA methodology deployed it will also be important to understand the role of mitigation such as sustainable travel plans which can significantly improve the sustainability of a sites location but which is not apparent should the assessment rely on existing baseline or GIS data.</p>
Pro Vision for Audley Group	<p>With reference to comments on behalf of Audley Group on the Local Plan Review, the Sustainability Appraisal (SA) Objectives should also include supporting sustainable development in the rural areas. The SA objectives do not distinguish between the urban and rural areas despite the different sustainability considerations in these areas.</p>

Respondent	Summary of Response
	<p>The benefit of appropriate development in the rural areas should not be underestimated. Paragraph 28 of the NPPF states that LPAs should:“support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.”</p> <p>And“promote the retention and development of local services and community facilities in villages, such as shops, meeting places, sports venues, cultural buildings, public houses and places of worship”.</p> <p>This theme is expanded in the Draft Revised NPPF under the sub-heading “Supporting a prosperous rural economy”.</p> <p>Draft paragraph 85 states:</p> <p><i>“Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found outside existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development 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). The use of previously developed land and sites that are well-related to existing settlements should be encouraged where suitable opportunities exist”.</i></p> <p>The sustainability objectives for the revised local plan, which form the foundation to the revised policy, should therefore be explicit in recognising the different challenges and opportunities in the rural areas of the district.</p>
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Historic England	<p>The key emerging local level objectives for the historic environment should be summarised as “conserve and enhance the historic environment”.</p> <p>We welcome West Berkshire Local Plan Review Objective G, although it should also refer to the significance/special interest of heritage assets (what it is that makes them important).</p>
Pegasus Planning Group for Donnington New Homes	No- we are not aware of any additional objectives that should either be included or removed.
Archaeology Team West Berkshire Council	It is dismaying seeing that Culture has the highest number of impacts from other objectives classed as ‘neutral’, or the other way round, the lowest number of positive impacts from the other objectives set out in the SA and the Local Dev Plan. This is noted in the text, but no mitigation is suggested. We should be looking particularly at improving communication between parties involved in delivering each objective so as to manage this as best as we can.
Transport Team West Berkshire Council	No
Mid & West Berks Local Access Forum	Nothing has come to mind so far.



### Responses received to the SA/SEA Scoping Report (February 2018)

**Q9: It may be necessary to rank the objectives to assess options. Do you have any comments on those which hold particular importance?**

Number of responses received: 20

Respondent	Summary of Response
Francis Connolly	Most important is to ensure deliverability
Ian Campbell	<p>The Local Plan seems to set in place a set of sustainability objectives. This I welcome. The snag is the input data is so massive that the reality is what matters more is what is left out, not what is put in.</p> <p>For example, in (Table 3) the column 'Suggested indicators' for the provision of housing 'to maximise the provision to meet identified (demand) the Plan puts forward the number of housing completions as an indicator.</p> <p>TOO RISKY? The simplistic, rational answer is to give back to owners of the countryside the right to develop their land. Although it is not a solution I support the supply of new homes would rocket up because the scarcity is massive. The obvious consequence is that large parts of the open countryside in West Berkshire will be built over in a random way.</p> <p>If national land protection policies remain in place then the new homes following restoration of development rights will only be built on unprotected land. There is plenty of that in the east and south of the council district. A policy on these lines justifies Grazeley, at least in part. But it also justifies other unprotected land areas in the vicinity too. Untested with like locations Grazeley is premature. As the Plan recognises house prices are too high, it is apparent the remedy lies in the hands of the council. This sequential analysis is ignored in the Plan. Without it the next generation must conclude there is another agenda, which remains unstated.</p> <p>EFFICIENT LAND USE. A second SA Objective (4) is 'to promote and maximise opportunities for all forms of safe and sustainable travel. This is a worthy objective with no teeth. To minimise additional private cars on the public road system additional travel modes of similar appeal must be offered. This can only be viable in new settlements of medium and high densities. The fleeting mention of a new settlement policy does not convince me the council have the understanding, let alone the capacity to deliver such a futuristic outcome. Over a long timescale; over a large area; with suitable cross-border governance in place, a sustainable travel solution becomes realistic. It also fulfils section 7, 'to promote and improve the efficiency of land use. Indeed the benefits will, be overlapping for several indicators.</p>
Thatcham Town Council	Housing should be a priority given the national need for more house building.
West Waddy ADP for Gerald Palmer Eling Trust	Housing is of particular importance as it is not only needed to ensure a good standard of living but is an essential requirement. It should therefore be given the highest ranking.
Joy Schlaudraff	<p>Yes !</p> <p>The whole chart (Summary of Key Emerging Local Level Objectives, at end of Appendix 1) has got the priorities back to front !</p>

Respondent	Summary of Response
	<p>The objectives are right in the main, but should read from bottom to top, not top to bottom. They should read:</p> <ul style="list-style-type: none"> <li>Economy and Infrastructure</li> <li>Communities and Wellbeing</li> <li>Climate change and resource efficiency</li> <li>Biodiversity and green infrastructure</li> <li>Landscape, townscape and cultural heritage</li> </ul> <p>Read them through in that order, and it all makes more sense. This would be far more successful and address needs quickly. Agriculturally poor land, in addition, should be allowed to develop, where in sustainable locations, and not have to be a designated official farm, in order to diversify. That is just ridiculous</p>
Woolf Bond Planning for Donnington New Homes	<p>We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.</p>
Pegasus Planning Group for Donnington New Homes	<p>SA Objective 1: 'To enable provision of housing to meet identified need in sustainable locations' should be considered the most important objective. The core tenet of the NPPF is the presumption in favour of sustainable development, as the government attempts to increase the supply of housing. The Local Plan to 2036 will likely have a higher OAN when it is calculated using the government's new standardised method, meaning that more sites will need to be allocated for housing in the Local Plan to 2036. The objective within this, 'To enable provision of housing to meet all sectors of the community, including those with specialist requirements' is also very important. The Draft Revised NPPF reiterates the importance of providing more accessible housing units for older people, and this objective will help this to be achieved. However, it would be helpful if more specific reference could be added to meeting the needs of older people.</p> <p>SA Objective 2: 'To improve health, safety and wellbeing and reduce inequalities' is also a very important objective. As more housing is developed, and areas become denser, it is more important than ever that green space exists to be used by those who do not easily have access to it at home. The objective within this, 'To enable the protection and enhancement of high quality multi-functional green infrastructure across the District' reiterates that protecting existing green space, and creating new, useable green space, is an essential part of new development.</p> <p>SA Objective 3: 'To improve access to education, health and other services' is also an important objective. Given growing populations and the quantity of new housing being developed, community uses are extremely valuable for maintaining existing communities, and bonding new communities together.</p>
Stratfield Mortimer Parish Council	<p>There does not seem to be an overall vision/objective which puts these objectives in context. Without such a context it is difficult to rank objectives as they all contribute differently to different aspirations. With such an overall vision/objective the public may be able to make informed choices. This is not the case at present.</p>

Respondent	Summary of Response
	For instance if the overall object is to be able to sustain a better lifestyle without putting future generations at risk then objective 7 seems to have little bearing.
Carter Planning for Mr R.L.A Jones	The Respondent supports the Council's objectives. In particular the Respondent fully supports the Number 1 objective "To enable the provision of housing to meet identified need in sustainable locations". This should remain the Number 1 objective of the new Local Plan.
Burghfield Parish Council	All ten objectives are very important, and we would not wish to rank them. Indeed, they could be listed in alphabetical order to emphasise that they are not ranked.
Burghfield NDP Steering Group	All ten objectives are very important, and we would not wish to rank them. Indeed, they could be listed in alphabetical order to emphasise that they are not ranked.
North Wessex Downs AONB	Yes as one of the greatest pressure is on the natural environment from housing, objective G should be high on the agenda along with objective H and C, whereby efficient use of existing vacant sites are sought first for development before greenfield sites.
Turley for North East Thatcham Consortium	<p>The National Planning Policy Framework (NPPF) and the proposed revisions both state that the purpose of the planning system is to contribute to the achievement of sustainable development.</p> <p>Paragraph 8 of the proposed Revisions to the NPPF state that the three pillars (economic, social, environmental) of sustainable development should be pursued in mutually supportive ways.</p> <p>With this statement in mind, the Consortium considers that it is difficult to rank the SA objectives in accordance of importance given that all represent the three pillars of sustainable development which must be pursued jointly. As an example, the provision of additional private and affordable housing within the District is an absolute priority social and economic priority yet the SA Scoping Report recognises that this might result in some environmental impacts which, following mitigation could be acceptable to West Berkshire.</p> <p>In practical terms the Consortium recognises that this may require qualitative judgement by the SA Practitioner of the impacts and benefits from any policies or proposed allocations upon the SA objectives. It is therefore of fundamental importance to the SA and Local Plan Review Process that the methodology and conclusions of each key stage of the Local Plan Review are transparent and available for public consultation.</p> <p>Of particular interest to the Consortium will be the methodology deployed by the SA to assess all of the <i>reasonable alternatives</i> (site allocations) to deliver the housing and employment need within the District. There is an established body of case law and best practice to ensure that the SA makes a positive contribution to the selection of the most sustainable options for development within a Local Plan.</p> <p>The Consortium would be pleased to liaise further with West Berkshire Council during the development of the SA Process and Local Plan Review in order to ensure it is robust and in accordance with the necessary guidance and legislation.</p>
Pro Vision for Audley Group	Meeting the accommodation and care needs of the ageing population, which is noted to be higher than the national average in West Berkshire (Sustainability Scoping Report: Table 2, page 17), should be one of the key priorities for the Local Plan Review. Failure to

Respondent	Summary of Response
	prioritise this issue is likely to have a significantly detrimental affect on the overall housing provision, health and social well-being in the district.
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Historic England	If it is necessary to rank the objectives to assess options, then we consider that Objective 5 should be accorded particular importance, having regard to statutory requirements regarding listed buildings, scheduled monuments and conservation areas and the clear indications in the National Planning Policy Framework that heritage assets should be conserved and enhanced.
Pegasus Planning Group for Donnington New Homes	SA Objective 1: 'To enable provision of housing to meet identified need in sustainable locations' should be considered the most important objective. The core tenet of the NPPF is the presumption in favour of sustainable development, as the government attempts to increase the supply of housing. The Local Plan to 2036 will likely have a higher OAN when it is calculated using the government's new standardised method, meaning that more sites will need to be allocated for housing in the Local Plan to 2036. SA Objective 9: 'To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change', and the objective within this, 'To sustainably manage flood risk to people, property and the environment' also hold a particular importance. Given the changing climate, and the more frequent occurrence of major flooding events, it is becoming increasingly important to ensure that new development mitigates any potential flood risk to itself, and where possible, reduces flood risk for surrounding areas as well.
Transport Team West Berkshire Council	The Objectives that in my view hold particular importance are: Objective 10: to support a strong, diverse and sustainable economic base which meets identified needs – on the grounds that the ability to deliver against other objectives is likely to be reliant upon economic performance; Objective 1: to enable provision of housing to meet identified need in sustainable locations – on the grounds that ensuring the availability of housing – of suitable quality - in appropriate, accessible places is intrinsically linked to economic performance and social cohesion. Objective 3: to improve accessibility to community infrastructure; Objective 4: to promote and maximise opportunities for all forms of safe and sustainable travel; Objective 2: to improve health, safety and well-being and reduce inequality - Again these objectives are inter-related; the establishment of and continued support for more sustainable modes of transport under Objectives 3 and 4 can contribute to reducing inequality as well as improving access and enhancing economic opportunities.
Mid & West Berks Local Access Forum	The Forum is not convinced that ranking distinct objectives is appropriate as each is important in its own right. However, it might be noted that it is often said that good health is the most important aspect of life and thus objective H should have a high priority.
British Horse Society	We are not sure this is a valuable exercise as each objective is important in its own right.

### Responses received to the SA/SEA Scoping Report (February 2018)

**Q10: Do the indicators provide a relevant measure for the associated objectives? If not, then please suggest additional indicators.**

Number of responses received: 21

Respondent	Summary of Responses
Francis Connolly	Generally yes
Ian Campbell	<p>The Local Plan seems to set in place a set of sustainability objectives. This I welcome. The snag is the input data is so massive that the reality is what matters more is what is left out, not what is put in.</p> <p>For example, in (Table 3) the column 'Suggested indicators' for the provision of housing 'to maximise the provision to meet identified (demand) the Plan puts forward the number of housing completions as an indicator.</p> <p>TOO RISKY? The simplistic, rational answer is to give back to owners of the countryside the right to develop their land. Although it is not a solution I support the supply of new homes would rocket up because the scarcity is massive. The obvious consequence is that large parts of the open countryside in West Berkshire will be built over in a random way.</p> <p>If national land protection policies remain in place then the new homes following restoration of development rights will only be built on unprotected land. There is plenty of that in the east and south of the council district. A policy on these lines justifies Grazeley, at least in part. But it also justifies other unprotected land areas in the vicinity too. Untested with like locations Grazeley is premature. As the Plan recognises house prices are too high, it is apparent the remedy lies in the hands of the council. This sequential analysis is ignored in the Plan. Without it the next generation must conclude there is another agenda, which remains unstated.</p> <p>EFFICIENT LAND USE. A second SA Objective (4) is 'to promote and maximise opportunities for all forms of safe and sustainable travel. This is a worthy objective with no teeth. To minimise additional private cars on the public road system additional travel modes of similar appeal must be offered. This can only be viable in new settlements of medium and high densities. The fleeting mention of a new settlement policy does not convince me the council have the understanding, let alone the capacity to deliver such a futuristic outcome. Over a long timescale; over a large area; with suitable cross-border governance in place, a sustainable travel solution becomes realistic. It also fulfils section 7, 'to promote and improve the efficiency of land use. Indeed the benefits will, be overlapping for several indicators.</p>
West Waddy ADP for Gerald Palmer Eling Trust	<p>The housing indicators are:</p> <ul style="list-style-type: none"> <li>• No of housing completions</li> <li>• Affordable housing completions</li> <li>• Housing mix by type and size</li> </ul> <p>These are not sufficient on their own but need to be measured against housing need for each of the sub areas including the rural areas to ensure that housing provision is distributed across the District, including in rural communities, and that the key sustainability issues arising from a lack of housing for key occupational workers; first time buyers and affordable housing are addressed.</p>

Respondent	Summary of Responses
Joy Schlaudraff	<p>Yes and no. The lower objectives should have a higher priority as before said, and the objectives should be ranked differently. Bottom to top. And the first objective should be left off, as we are giving it far too great place.</p>
Woolf Bond Planning for Donnington New Homes	<p>We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.</p>
Pegasus Planning Group for Donnington New Homes	<p>Many of the indicators do provide a relevant measure for the associated objectives. However, some objectives do require additional indicators if they are to be judged correctly. Objective 2(3), 'To enable the protection and enhancement of high quality multifunctional green infrastructure across the District' currently does not include an indicator regarding allotments. It is suggested that an additional indicator is added for this objective, which states 'Number of allotments'. This is because allotments are extremely valuable for many people, especially those who are older, who do not have easy access to a garden. As densities increase, the demand for allotments is rising as people seek an area of green space that they can make their own. They are an important part of the overall provision of Green Infrastructure in West Berkshire, and should be considered as such.</p>
Environment Agency	<p>Under objective 9: "To reduce emissions contributing to climate change and ensure adaptation measures are in place to respond to climate change". There is sub heading called "To sustainably manage flood risk to people, property and the environment". There are indicators for the objective concerning flood risk. One of these indicators says, "No of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds" We think this should read: "No of planning permissions granted contrary to the advice of the Environment Agency on flood risk grounds" This objective should also include an indicator for no inappropriate development within the floodplain. This follows the guidance for flood risk in the Planning Practice Guidance. Table 3 'Flood Risk vulnerability and flood zone compatibility shows which development vulnerability category from table 2 should not be permitted in certain flood zones. There should also be an indicator about the avoidance of development in the Flood Zones. This ties in with the requirements of the flood risk sequential test. Under objective 5 another indicator to add in should be "conserve and enhance ecological /wildlife corridor value of watercourses and their ecological buffer zones."</p>
Energy Team West Berkshire Council	<p>Headline Objective 1 should be more than just about meeting identified need through the number of affordable homes completed. This indicator focuses on the ability for individuals to buy (capital) the house without considering if they can afford to 'run' (revenue) the house. The area of West Berkshire whilst considered affluent still has a number of fuel poverty areas and with increasing energy prices, alongside slow wage growth, this issue could potentially worsen across the district without the proper strategic intent and planning. The WBLP review would not be expected to provide the solution on its own but is an important 'tool' as part of the solution.</p>

Respondent	Summary of Responses				
	<p>As indicated under the response to question 7, there should be an indicator included under Objective 4 (or Objective 9) that measures the adoption and use of Low Emission Vehicles and their associated infrastructure. For example:                      “Number of EVs registered in WBC”                      “Number of public charging points available in West Berks”                      Under Objective 8, the indicator ‘Megawatts generated from renewable energy sources’ needs clarification. Is this associated with housing developments or an indicator for the district in its own right? If associated with housing developments then it could be argued that this indicator favours larger developments in that it would be easier for them to achieve any target just through the adoption of one technology such as solar PV. Depending on whether this is a district or housing development indicator, it may be more useful to put such an indicator into context by changing the terminology to something along the lines of:                      “% of total energy consumption for the district coming from local renewable energy generation” OR                      “% of the total energy consumption for the housing development coming from on-site renewable energy generation”.</p>				
Julian Worth	Reducing tonnage of minerals extracted in West Berks, year-on-year				
Stratfield Mortimer Parish Council	<p>Picking up the point from the previous question, if there was an explicit overall objective it would be a lot easier to see if the indicators were relevant to not only the particular objective but to the overall context of the analysis. Some of the objectives do not seem to be consistent across the page. For instance</p> <table border="0" data-bbox="568 794 2154 1337"> <tr> <td data-bbox="568 1002 869 1091"><b>7: To promote and improve the efficiency of land use.</b></td> <td data-bbox="869 1002 1182 1107">To maximise the use of previously developed land and buildings where appropriate</td> <td data-bbox="1182 804 1496 1292"> <ul style="list-style-type: none"> <li>• Percentage of major residential developments completed at: i) less than 30dph; ii) between 30 and 50 dph; iii) above 50 dph</li> <li>• Percentage of new or converted dwellings and non-residential developments on previously developed land</li> <li>• Area of registered brownfield sites suitable and available for residential development</li> </ul> </td> <td data-bbox="1496 1018 1697 1075"><b>Material Assets Soil</b></td> </tr> </table>	<b>7: To promote and improve the efficiency of land use.</b>	To maximise the use of previously developed land and buildings where appropriate	<ul style="list-style-type: none"> <li>• Percentage of major residential developments completed at: i) less than 30dph; ii) between 30 and 50 dph; iii) above 50 dph</li> <li>• Percentage of new or converted dwellings and non-residential developments on previously developed land</li> <li>• Area of registered brownfield sites suitable and available for residential development</li> </ul>	<b>Material Assets Soil</b>
<b>7: To promote and improve the efficiency of land use.</b>	To maximise the use of previously developed land and buildings where appropriate	<ul style="list-style-type: none"> <li>• Percentage of major residential developments completed at: i) less than 30dph; ii) between 30 and 50 dph; iii) above 50 dph</li> <li>• Percentage of new or converted dwellings and non-residential developments on previously developed land</li> <li>• Area of registered brownfield sites suitable and available for residential development</li> </ul>	<b>Material Assets Soil</b>		

Respondent	Summary of Responses
	<p>In this example it would appear that the objective is about using previously developed land. However one of the indicators is about densities which has nothing to do with previously developed land. Either the objective should explicitly include a mention of increased densities or the density indicator should be removed.</p> <p>Some of the items in the table are not fully related. For instance</p> <ul style="list-style-type: none"> <li>• Percentage of development incorporating water conservation and/or water efficiency measures</li> <li>• New Developments with SUDs installed (EA)</li> </ul> <p>To reduce water consumption and promote reuse</p> <p>The use of SUDs as an indicator is only marginally relevant as SUDs normally relate to the discharge of surface water not consumption by individuals.</p> <p>This example also illustrates a more general point that many of the indicators measure inputs or outputs as opposed to outcomes. Hence it is perfectly possible to measure the number of dwellings with water efficiency measures installed (an input measure) but how these are used may mean that they are just encouraging people to use more water. A better measure would be simply to measure the amount of water consumed in the District (an outcome measure). While it is recognised that moving to outcome measures does involve a different mind-set from that employed traditionally to derive indicators or measures research has shown that there are marked benefits from doing so.</p> <p>Another example is objective 9 where the number of SUDs schemes on new developments is a measure. All this does is measure the 'capping' of a problem and does nothing to address the outcome which would be for less dwellings overall to be subject to flooding by 2036. Without such outcome measures there is virtually no challenge to policy makers to consider what policies can be derived which make overall improvements to the life of all residents.</p> <p>In objective 3 which is about accessibility to community infrastructure should there not be an indicator which covers cultural venues to create a measure for the new culture strategic objective? In the same section why is it only new residential development that is mentioned in terms of accessibility? Surely the provision of new facilities to assist all the residents of an area is more important. Indeed restricting any indicator to new development effectively creates a double standard and should be avoided. Another example is objective 9 where many of the indicators are all about new developments when the whole of the area should be considered.</p>
Carter Planning for Mr R.L.A. Jones	Yes
Burghfield Parish Council	The list looks pretty comprehensive.

Respondent	Summary of Responses
Burghfield NDP Steering Group	The list looks pretty comprehensive.
North Wessex Downs AONB	Think the indicators suggested will provide a basic baseline for the future SA/SEA
Turley for North East Thatcham Consortium	Please see the Consortiums response to Question 8.
Pro Vision for Audley Group	With reference to the National Planning Policy Guidance (NPPG) (NPPG Paragraph: 037 Reference ID: 3-037- 20150320), it would be appropriate to amend the ‘suggested indicators’ for SA Objective 1 (To enable provision of housing to meet identified need in sustainable locations) as follows: “Number of housing units for older people <b><i>including Use Class C2</i></b> ” (our emphasis).
Woolf Bond Planning for Donnington New Homes	We welcome the inclusion of an objective relating to housing that acknowledges the need for joint working with other Berkshire authorities, the need to meet objectively assessed need for market and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.
Pegasus Planning Group for Donnington New Homes	Yes - the indicators do provide a relevant measure for the associated objectives.
Transport Team West Berkshire Council	Yes, the indicators appear to provide relevant means of measurement against the identified objectives.
Mid & West Berks Local Access Forum	We think that the indicators under 2 (To enable the protection and enhancement of high quality multi-functional GI ) could be strengthened to measure the value of public rights of way and public open space to communities. We might work with the Council to identify indicators. So, often, these facilities are the Cinderella but they provide places for healthy outdoor exercise, free at the point of use and thus available for a wide range of socio-economic groups and for a wide variety of activities (walking, dog walking, horse riding, jogging, cycling, carriage driving).
British Horse Society	An indicator needs to be included which measures the importance to the equestrian community of public rights of way and open spaces open to equestrians (eg. commons) and any other places open to them so that these important facilities do not get overlooked in future development plans.

### Responses received to the SA/SEA Scoping Report (February 2018)

#### Q0: Other comments

Number of responses received: 7

Respondent	Summary of Response
Transport for London	Thank you for consulting Transport for London (TfL). I can confirm that TfL has no comments to make on the scoping reports
Wokingham Borough Council	Thank you for consulting Wokingham Borough Council on the Local Plan Review to 2036 Scoping Report and SA Scoping Report for West Berkshire. WBC has reviewed these documents and does not wish to make any comment at this stage. We welcome this local plan review, and look forward to future progress on the Sustainability Appraisal and future consultations for the new plan.
Historic England	General advice on Sustainability Appraisal and the historic environment is set out in Historic England's Advice Note 8 "Sustainability Appraisal and Strategic Environmental Assessment": <a href="https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://www.historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a> .
Ian Campbell	<p>SUMMARY</p> <p>It is not simple in a council area with a strong growth trademark, where past policies are rooted in long running council wishes to slow growth and stop change in the open countryside, to strike an enduring balance between the two opposing desires. Long entrenched resistance to change results in shortages of homes at affordable prices. Priorities must change.</p> <p>This draft Local Plan fails to address the core issues. It is my opinion Thames Valley growth pressures will continue far into the future. Falls in immigration will not off-set the impact of an ageing population or the magnetic effect of London, now a city of world appeal. Central government will come under increasing pressure to force the building of many more new, affordable homes to manage the numbers of alienated young, frustrated unsuccessful first time buyers urgently, currently unable to follow their parents example. This frustration will grow and impact on future housing policies.</p> <p>West Berkshire, and its neighbours in the western region need to be match or be ahead of Whitehall thinking. Looking ahead for example, what happens to places like West Berkshire when interest rates start to return to historic norms? And what happens when places like London, Slough and Surrey run out of unprotected land? Where will their overspill go? What happens if longevity increases? What happens if high levels of immigration continue?</p> <p>These are the questions a sustainable local plan must ask and answer. To produce a sustainable Local Plan for a target area like West Berkshire with lot of well-located unprotected land this Local Plan must, as the Duty to Cooperate expects, must look far ahead and seek ways of helping neighbours whilst profiting in the process locally too.</p> <p>If the West of Berkshire Spatial Framework is the first phase of a regional masterplan for central Thames Valley, and this can be demonstrated to the Inspector the Plan may be sound. Are all the elements tested? Is there evidence to support them? It is not apparent in this Local Plan.</p>

Respondent	Summary of Response
	<p>There is way forward. The SHMA figures, if rolled forward suggest at least 200,000 new homes will be needed in the Thames Valley over the 60/70 year's ahead. This means finding a location in the Thames Valley for a new Milton Keynes with local support. With foresight this is possible. To win local support some policy changes will be necessary. They can be summarised as follows</p> <ul style="list-style-type: none"> <li>~ a plan for the period 2036-2086;</li> <li>~ cross-party politically support locally, to match the Westminster consensus;</li> <li>~ cross-border cooperation regionally;</li> <li>~ agreement that nationally protected areas remain unchanged;</li> <li>~ future major new development will be directed to unprotected countryside;</li> <li>~ new settlements or urban extensions will be medium and high density, highly accessible by public transport with low or very low private car ownership.</li> <li>~ existing land owners cooperation is vital. This will be achieved by ensuring loss of longterm development rights causes no financial loss, and the value of existing use rights will increase through improvements to the compulsory purchase code.</li> <li>~ land value capture is included in the next Local Plan., together with an enhanced compensation code for land owners and introduction of financial compensation to local residents in host areas.</li> </ul> <p>Those who say this approach fails to address the short term supply deficit do not understand the market. Existing land owners, seeing a new political consensus on future land supply, and no prospect of policy U-turns will accelerate existing land supply pipelines as the competitive impact of a new supply sources becomes clear.</p> <p>Appendix provided as part of the representation which sets out some details about the respondent and their background. *Not made publicly available.</p>
Natural England	<p>Natural England would like to would like to see specific reference made to water quality of the River Kennet SSSI and the River Lambourn SSSI/SAC designated sites within the document.</p> <p>These designated sites should be given particular consideration (and be monitored through the appropriate indicators), due to their sensitivity to high phosphorus concentrations and subsequent vulnerability with regard to package treatment plant and septic tank usage.</p> <ul style="list-style-type: none"> <li>• Green Infrastructure should focus on improving existing routes and links within both rural and built environments, and not just creating new ones. Existing green linear features should be considered such as river corridors and existing canal networks and enhanced wherever possible, thus contributing to the council's commitment to providing biodiversity net gain.</li> <li>• In the last few paragraphs of Page 25, it is stated that impacts on the natural environment are heavily dependent on the siting and type of development. This should also reference scale and design of developments (with regards to potential effects on both biodiversity and landscape).</li> </ul>
Bracknell Forest Borough Council	<p>Part of your Borough is seemingly within 5 km and within 7km of the Thames Basin Heaths SPA. The implications are that developments up to 7km may need to provide mitigation measures. It is advisable that you contact Natural England (NE) on this matter. It should be noted that the Habitat and Species Regulations have been updated, with the most recent regulations published in 2017. Bracknell Forest Council is currently agreeing a methodology with NE regarding the air quality assessment which will be</p>

Respondent	Summary of Response
	<p>undertaken as part of the HRA for the Bracknell Forest Local Plan which will include an in-combination assessment. We look forward to sharing information on this issue in the future with West Berkshire Council, as appropriate.</p> <p>Please note the 'Bracknell Forest Comprehensive Local Plan' (referred to in Appendix 1 of the SA) has now been renamed the 'Bracknell Forest Local Plan' (BFLP) and provides the long term spatial vision and development strategy for the Borough up to 2034. A consultation on the draft BFLP, including draft SA, draft HRA and draft Infrastructure Delivery Plan took place during February/March this year. It is hoped to arrange a Duty to Co-operate meeting with the relevant bodies to discuss issues raised, over the next couple of months.</p> <p>We welcome the opportunity for on-going discussion relating to the preparation of the above documents, and would be willing to attend meetings, workshops, respond to consultation material as appropriate, and ask to be kept informed of any future consultations.</p>
Forestry Commission, South East and London Area Office	<p><b>Local Plans and ancient woodland – Forestry Commission approach</b></p> <p>The Forestry Commission is not in a position to input into the consultation process for Local Plans. However, the information below is provided to assist you in assessing the appropriateness of sites for future development, and to highlight opportunities for achieving your renewable energy obligations.</p> <p><b>A summary of Government policy on ancient woodland</b></p> <p><a href="#">Natural Environment and Rural Communities Act 2006</a> (published October 2006).</p> <p><b>Section 40</b> – “Every public authority must, in exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity”.</p> <p><a href="#">National Planning Policy Framework</a> (published March 2012).</p> <p><b>Paragraph 118</b> – “planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss”.</p> <p><a href="#">National Planning Practice Guidance</a> – Natural Environment Guidance. (Published March 2014)</p> <p>This Guidance supports the implementation and interpretation of the National Planning Policy Framework. This section outlines the Forestry Commission’s role as a <a href="#">non-statutory consultee</a> on “development proposals that contain or are likely to affect Ancient Semi-Natural woodlands or Plantations on Ancient Woodlands Sites (PAWS) (as defined and recorded in <a href="#">Natural England’s Ancient Woodland inventory</a>), including proposals where any part of the development site is within 500 metres of an ancient semi-natural woodland or ancient replanted woodland, and where the development would involve erecting new buildings, or extending the footprint of existing buildings”</p> <p>It notes that <b>ancient woodland is an irreplaceable habitat</b>, and that, in planning decisions, <b>Plantations on Ancient Woodland Sites (PAWS) should be treated equally in terms of the protection afforded to ancient woodland in the National Planning Policy Framework</b>. It highlights the Ancient Woodland Inventory as a way to find out if a woodland is ancient.</p> <p><a href="#">Standing Advice for Ancient Woodland and Veteran Trees</a>. (Published April 2014)</p> <p>The Forestry Commission has prepared joint <a href="#">standing advice</a> with Natural England on ancient woodland and veteran trees which we refer you to in the first instance. This advice is a material consideration for planning decisions across England. It explains the definition of ancient woodland, its importance, ways to identify it and the policies that relevant to it. It also provides advice on how to</p>

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	<p>protect ancient woodland when dealing with planning applications that may affect ancient woodland. It also considers ancient wood-pasture and veteran trees.</p> <p>The Standing Advice website will provide you with links to <a href="#">Natural England's Ancient Woodland Inventory assessment guides</a> and other tools to assist you in assessing potential impacts. The assessment guides sets out a series of questions to help planners assess the impact of the proposed development on the ancient woodland. <b>Case Decisions</b> demonstrates how certain previous planning decisions have taken planning policy into account when considering the impact of proposed developments on ancient woodland. These documents can be found on our <a href="#">website</a>.</p> <p><a href="#">The UK Forestry Standard</a> (3rd edition published November 2011).</p> <p><b>Page 24</b> "Areas of woodland are material considerations in the planning process and may be protected in local authority Area Plans. These plans pay particular attention to woods listed on the Ancient Woodland Inventory and areas identified as Sites of Local Nature Conservation Importance SLNCIs).</p> <p><a href="#">Keepers of Time</a> – A Statement of Policy for England's Ancient and Native Woodland (published June 2005).</p> <p><b>Page 10</b> "The existing area of ancient woodland should be maintained and there should be a net increase in the area of native woodland".</p> <p><a href="#">Natural Environment White Paper "The Natural Choice"</a> (published June 2011)</p> <p><b>Paragraph 2.53</b> - This has a "renewed commitment to conserving and restoring ancient woodlands".</p> <p><b>Paragraph 2.56</b> – "The Government is committed to providing appropriate protection to ancient woodlands and to more restoration of plantations on ancient woodland sites".</p> <p><a href="#">Biodiversity 2020: a strategy for England's wildlife and ecosystem services</a> (published August 2011).</p> <p><b>Paragraph 2.16</b> - Further commitments to protect ancient woodland and to continue restoration of Plantations on Ancient Woodland Sites (PAWS).</p> <p>Renewable &amp; low carbon energy</p> <p>The resilience of existing and new woodland is a key theme of the Forestry Commission's work to Protect, Improve and Expand woodland in England we will continue to work with Forestry / Woodland owners, agents, contractors and other Stakeholders to highlight and identify, pests and diseases and to work in partnership to enable Woodlands and Forests are resilient to the impacts of Climate Change.</p> <p>Woodfuel and timber supplies continues to be an opportunity for local market growth whilst also enabling woodlands to be brought back into active management.</p> <p>Flood risk</p> <p>The planting of new riparian and floodplain woodland, can help to reduce diffuse pollution, protect river morphology, moderate stream temperature and aid flood risk management, as well as meet Biodiversity Action Plan targets for the restoration and expansion of wet woodland.</p> <p>The Forestry Commission is keen to work in partnership with Woodland / Forest Stakeholders to develop opportunities for woodland creation to deliver these objectives highlighted above.</p> <p>In the wider planning context the Forestry Commission encourages local authorities to consider <a href="#">the role of trees in delivering planning objectives</a> as part of a wider integrated landscape approach. For instance through:</p>

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	<ul style="list-style-type: none"> <li>• the inclusion of <a href="#">green infrastructure</a> (including <a href="#">trees and woodland</a>) in and around new development; and</li> <li>• the use of locally sourced wood in construction and as a sustainable, <a href="#">carbon lean fuel</a>.</li> </ul>