

Appendix 1

Consultation responses on SA Scoping Report 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.

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	Council Response
Julian Worth	<p>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</p>	<p>These issues are addressed by the Minerals and Waste Local Plan that is in preparation, which includes objectives for sustainable locations with respect to flooding and the avoidance of harm to the North Wessex Downs AONB, Scheduled Monuments, Special Areas of Conservation and other interests of acknowledged importance. The Scoping Report for the Local Plan Review, similarly includes sustainability objectives for the protection and conservation of landscape and water amongst others.</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>Trends and outcomes are not incompatible with issues that those trends and outcomes indicate.</p> <p>Appendix 2 of the report includes reference under each topic heading to "Future Trends" so far as evidence can support. Text to acknowledge the potential impact of future technological innovation has been added to the Main</p>

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	<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. Similarly should not the objective about emissions start off with eliminating the need for unnecessary emissions before going any further?</p>	<p>Report and under “Economy” in Appendix 2 baseline information .</p> <p>There are tensions and complementarities between objectives that require to be considered in the round. For instance, putting housing in more sustainable locations, having schools and GP surgeries within limited distances, increasing opportunities for walking, cycling and use of public transport – are all part of the sustainability equation to reduce the need to travel.</p>
Carter Planning for Mr RLA Jones	None	Noted
Burghfield Parish Council	Not that we are aware of.	Noted
Burghfield NDP Steering Group	Not that we are aware of.	Noted
Planning Advisor, 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.	AONB Management Plan is already included. Reference to 25 year plan and NPPF update added to Appendix 1 (Appendix 3 in Reg 18 consultation December 2020).
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.</p> <p>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>	

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	<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"> The draft revisions to the National Planning Policy Framework (NPPF). https://www.gov.uk/government/collections/national-planning-policy-framework-and-developer-contribution-consultations <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"> Conserve and enhance wildlife habitats and species <i>or where possible secure net overall gain where development is needed to satisfy other objectives.</i> To improve educational standards and access to educational facilities <i>in line with the growth in local communities.</i> The need to provide for new community infrastructure such as primary and secondary schools to meet current and projected demand. Maintaining the vitality of town and village centres <i>through the allocation of new housing and employment land in the most sustainable locations.</i> <i>The need to tackle areas of deprivation in Thatcham and Newbury in the context of a relatively affluent local authority area.</i> 	<p>Inclusion after publication in Summer 2018 For now reference to consultation document has been added to Appendix 1 under current NPPF entry.</p> <p>The conservation and enhancement of wildlife habitats and species are subject to legislation and therefore do not fit an 'either/or' test.</p> <p>Added text "...and facilities" to Objective 3 education sub-objective.</p> <p>The remaining objectives are included in the SA objectives proposed within the SA main scoping report and need to be read individually and in combination as many are mutually supportive.</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.	Noted.
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 Historic Environment Record, the West Berkshire Historic Landscape Characterisation, Conservation Area Character Appraisals, any archaeological studies etc.</p>	<p>Reference added to Appendix 1.</p> <p>These are technical documents at a level that is considered too detailed to be included in Appendix 1. Some hyperlinks are included in the baseline text in Appendix 2.</p>

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<p>Pegasus Planning Group for Donnington New Homes</p>	<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>	<p>Inclusion after publication in Summer 2018 For now reference to consultation document has been added to Appendix 1 under current NPPF entry.</p> <p>Noted for policy formulation.</p>
<p>Archaeology Team West Berkshire Council</p>	<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>Where a number of topics have objectives in common such as ‘character and distinctiveness’ and ‘conserve and enhance’ here then they have been include in a headline objective. However each have their</p>

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	<p>Missing from the policies is the Culture White Paper 2016 – should go under National, key objectives were “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” Should the emerging Vision 2036 be mentioned under Plans? ie Vision 2036 West Berkshire in 2036 where</p> <ol style="list-style-type: none"> 1. everyone benefits from a thriving economy. 2. residents get the housing they need. 3. individuals and communities are enabled to fulfil their potential. 4. everyone experiences good health and wellbeing and where people are able to age well. 5. the local environment is treasured and protected for future generations to enjoy. 	<p>separate clear sub-objectives and indicators</p> <p>Reference added to Appendix 1.</p> <p>Emerging policies and documents have not been included as such as it pre-supposes no change before publication which would be premature.</p>
<p>Public Transport Team, West Berkshire Council</p>	<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>	<p>Noted.</p>
<p>Mr Francis Connolly</p>	<p>Policies and proposals of neighbouring authorities, particularly Reading and Wokingham. Regional and sub regional transport plans and proposals including airports and rail.</p>	<p>Appendix 1 includes reference to the West Berkshire Local Transport Plan 2011-26 which highlights the need to work cross boundary in partnership with neighbouring authorities and other organisations. Text has been added to the section on the LTP to highlight this key need.</p>
<p>Mr Ian Campbell</p>	<p>There is one critical objective, which can only be achieved though the pursuit of sustainable policies, which is not explicitly stated in the February 2018 draft Local Plan. As there is no</p>	<p><i><u>Note that this stage is looking at the scope of the Review only. The draft</u></i></p>

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	<p>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. 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> <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><u>revised Local Plan and policies have yet to be produced.</u></p> <p>The guarantee requested is beyond the scope of a local plan sustainability appraisal as house prices are a product of variables many of which are outside the sphere of influence of the Local Plan. The basis for the Plan here will be the Berkshire SHMA and its objectively assessed need (OAN) for housing of all types and sizes before finalising figures during the planning process, including any changes in methodology for OAN. The SHMA included a review of house prices and their rates of change, and projections of trends based on demographics, employment trends, market signals and the need for affordable housing.</p> <p>Objective 1 of the SA scoping report objectives and Objective B of the Local Plan Review Scoping Report objectives, acknowledge and address the role of the Local Plan Review to 2036 with regard to housing provision.</p> <p>Noted.</p> <p>Noted</p>

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	<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.”</p> <p>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.</p> <p>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.”</p> <p>(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.</p> <p>To do so requires a comprehensive approach that tackles failure at every point in the system.”</p> <p>(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.”</p> <p>(Foreword in the same white paper by the Secretary of State for Communities and Local Government; February 2017)</p>	

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	<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 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.” (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. 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. West London’s overspill</p>	<p>Local Plans must be deliverable within the chosen time period. Levels of uncertainty and unforeseen events increase over time, indeed the proposed new NPPF requires local plan policies to be reviewed at least once every 5 years to ensure it remains current and up to date.</p> <p>There is no suggestion that land outside protected areas is automatically suitable for housing. There are many other issues of sustainability to consider eg accessibility to services and facilities.</p> <p>All local planning authorities have a legal duty to cooperate over all cross boundary strategic priorities. We use the Memorandum of Understanding on Strategic Planning (MoU) signed by all the Berkshire unitary authorities as a starting point to guide our approach to cooperation. The MoU provides a</p>

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	<p>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>	<p>framework for joint working between the Berkshire authorities and it allows refined Agreements to be agreed between individual authorities on specific areas where they consider it appropriate. The SHMA found strong evidence to support two separate market areas of east and west distinguished by the different levels of self-containment and the east's (including Slough) proximity to London.</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"> • 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; • An identified shortage of affordable and/or suitable homes for local people at different stages of life; • Allocation of appropriate employment land; • Maintaining vitality of town and villages centres; (p4 & 12) 	Noted.
Natural England	Reference should be made to the Government's 25 year Environment Plan and proposed amendments to the NPPF.	Reference is included.
Joy and Marc Schlaudraff	<p>Yes. The new draft nppf. Global issues (immigration) National need for housing/development</p>	Inclusion after publication in Summer 2018. For now reference to consultation document has been added to Appendix 1 under current NPPF entry.

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Woolf Bond Planning for Donnington New Homes	We agree that the suggested list of relevant policies, plans, programmes, and sustainable development objectives are appropriate.	Noted.
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:</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>	<p>Inclusion after publication in Summer 2018 For now reference to consultation document has been added to Appendix 1 under current NPPF entry.</p> <p>Noted.</p> <p>The Local Plan Review draft strategic objective on ‘Housing’ sets out the Council’s approach. Appendix 3 of the SA Scoping Report assesses the compatibility of the SA objectives against the Local Plan Review objectives.</p>

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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>Catchment Abstraction Management Strategy (CAMS) 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 https://www.gov.uk/government/collections/water-abstraction-licensing-strategies-cams-process</p> <p>Thames Catchment Flood Management Plan 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 https://www.gov.uk/government/publications/thames-catchment-flood-management-plan</p> <p>Water Cycle Study 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. 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>Noted.</p> <p>Reference added to Appendix 1 and text added to Appendix 2 under 'Water Supply'.</p> <p>Reference added to Appendix 1.</p> <p>Noted.</p> <p>The Council does not have a WCS but this will be done in preparation for the Local Plan Review.</p>

Respondent	Summary of Response	Council Response
	<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 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"> • Carbon Capture and storage • Phasing out installation of high carbon forms of fossil fuels in new and existing business during the 2020's • Phasing out the installation of high carbon forms of fossil fuel in new and existing homes, starting with new homes. • Strengthening energy performance standards for new and existing homes under building regs • INC futureproofing new homes for low carbon heating • Build and extend heat networks across the country • Ending the sale of new conventional petrol and diesel cars and vans by 2040 • Plans for public sector to lead the way in transitioning to zero emission vehicles <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>Reference added to Appendix 1.</p>

Respondent	Summary of Response	Council Response
<p>Mid & 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 http://info.westberks.gov.uk/article/29147</p> <p>2. The Mid & 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 a statutory body.</p> <p style="text-align: center;">MID AND WEST BERKSHIRE LOCAL ACCESS FORUM</p> <p>Policy relating to Planning Applications for Housing, Roads, Minerals & Waste sites and other industrial sites.</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> <ul style="list-style-type: none"> i. does not adversely affect existing public rights of way or other public open spaces in the area; ii. offers equivalent, or improved, diversion of existing public right of way affected by the development; 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; 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; v. Provides paths which are definitive, rather than permissive, and are therefore added to the definitive map and statement; <p>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>"</p> <p>3. We draw your attention to the DfT's document 'Local Cycling and Walking Infrastructure Plans' at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/607016/cycling-walking-infrastructure-technical-guidance.pdf</p>	<p>Referenced in Appendix 2, under Green Infrastructure.</p> <p>Noted. The Council has a ROWIP and is aware that it is due for renewal co-terminus with the preparation of the Local Plan Review.</p> <p>Noted.</p>
<p>British Horse Society</p>	<ul style="list-style-type: none"> i. The West Berks Council Rights of Way Improvement Plan (ROWIP) is probably relevant. 	<p>Referenced in Appendix 2, under Green Infrastructure.</p>

Respondent	Summary of Response	Council Response
	<p>ii. Please note the policy statement of the Mid & West Berks Local Access Forum on development given in its response to this consultation.</p> <p>iii. Strategy for the Horse Industry in England and Wales : https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales</p> <p>iv. 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</p> <p>v. 'Making Ways for horses' by the Equestrian Access Forum http://www.bhs.org.uk/~media/bhs/files/pdf-documents/making-ways-for-horses.ashx?la=en</p> <p>vi. The Health Benefits of Horse Riding at http://www.bhs.org.uk/enjoy-riding/health-benefits</p> <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 ride 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>	<p>Noted.</p> <p>Reference added to Appendix 1.</p> <p>Noted for policy formulation.</p> <p>Noted.</p>

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	Council Response
Stratfield Mortimer Parish Council	Yes	Noted.
Carter Planning for Mr R.L.A. Jones	<p>Yes.</p> <p>However it would have been helpful if “housing” could follow “population”. These two topics are linked and are fundamental to the new Local Plan.</p> <p>It would have been useful to state that the SHMA 2016 (Strategic Housing Market Assessment) which is referred to will be regularly updated.</p> <p>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>	<p>Noted.</p> <p>Generally, the idea is that places follow people.</p> <p>Text added to <i>Future Trends</i> under <i>Housing</i> in Appendix 2.</p> <p>Mechanisms are a matter of policy not the evidence base.</p>
Burghfield Parish Council	Yes. This seems a very thorough account of where we are.	Noted.
Burghfield NDP Steering Group	Yes. This seems a very thorough account of where we are.	Noted.
Planning Advisor for 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.	Housing numbers inside and outside the AONB are included in the Council's Annual Monitoring Reports.
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"> 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 	The baseline information makes specific mention of Thatcham in a

Respondent	Summary of Response	Council Response
	<p>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</p> <ul style="list-style-type: none"> • 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 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. • 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. • 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. • 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"> ○ The commuting survey appears to be based upon the 2011 Census and should therefore be updated in order to reflect current commuting patterns. 	<p>number of places including the effect of new housing growth on local demand and for additional infrastructure, especially for secondary places.</p> <p>Noted.</p> <p>Text added to the <i>Economy</i> section of Appendix 2 with regard to additional employment land and notes that further work is being done to refine the requirement.</p>

Respondent	Summary of Response	Council Response
	<ul style="list-style-type: none"> ○ 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. 	<p>Census data is used for this purpose and 2011 is the most recent.</p> <p>Noted.</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>	<p>Noted. The Council will be reviewing the settlement hierarchy and settlement boundaries which will include consideration of the needs of more rural parts of the District.</p> <p>The SHMA has reviewed the affordable housing need and it is included in Appendix 2 under <i>Housing</i>. To supplement, an affordable housing viability assessment has been completed.</p>
Historic England	<p>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.</p> <p>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.</p>	<p>Text for the dual designation added to Appendix 2 under <i>Historic Environment</i>, above <i>Table 3</i>.</p> <p>Noted.</p>
Pegasus Planning Group Ltd for	<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>	<p>Noted.</p>

Respondent	Summary of Response	Council Response
Donnington New Homes		
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.	Noted.
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.	Noted.
Mr Francis Connolly	Yes generally	Noted.
Hampshire County Council	We agree that the baseline data collected in Appendix 2 is appropriate to the WBLP Review.	Noted.
Mr Ian Campbell	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><u>Note that this stage is looking at the scope of the review only. The draft Local Plan and policies have yet to be produced.</u></p> <p>The guarantee requested is beyond the scope of a local plan sustainability appraisal as house prices are a product of variables many of which are outside the sphere of influence of the Local Plan. The basis for the Plan will be the Berkshire SHMA and its objectively assessed need (OAN) for housing of all types and sizes before</p>

Respondent	Summary of Response	Council Response
	<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>	<p>finalising figures during the planning process, including any changes in methodology for OAN. The SHMA included a review of house prices and their rates of change, and projections of trends based on demographics, employment trends, market signals and the need for affordable housing.</p> <p>Local Plans must be deliverable within the chosen time period. Levels of uncertainty and unforeseen events increase over time, indeed the proposed new NPPF requires local plan policies to be reviewed at least once every 5 years to ensure it remains current and up to date.</p> <p>The Sustainability Appraisal Scoping Report does not mention Grazeley. Please refer to paragraphs 5.7 and 5.8 of the West Berkshire Local Plan Review to 2036 ('Regulation 18') Scoping Report and associated consultation responses for further details.</p>

Respondent	Summary of Response	Council Response
West Waddy ADP for Gerald Palmer Eling Trust	<p>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 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:</p> <p><i>'All settlement boundaries, including those below the settlement hierarchy, will be reviewed through the new Local Plan.'</i></p> <p>It is also a critical piece of the evidence base for determining where housing development should go.</p>	<p>Noted.</p> <p>It is the intention of the Council to undertake a settlement boundary review.</p>
Joy and Marc Schlaudraff	<p>Yes, in general. It does not take enough notice of national or global concerns over housing provision.</p> <p>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.</p> <p>Housing is basic to all. If there is not housing, people can not prosper, in ANY way</p>	<p>Noted.</p> <p>Noted.</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>	<p>Noted. The Council will be reviewing the settlement hierarchy and settlement boundaries which will include consideration of the needs of more rural parts of the District.</p> <p>The SHMA has reviewed the affordable housing need and it is included in Appendix 2 under</p>

Respondent	Summary of Response	Council Response
		<i>Housing.</i> To supplement, an affordable housing viability assessment has been completed.
Pegasus Planning Group Ltd 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.	Noted.
Environment Agency	Please be aware that you can get flood risk data from us at enquiries_THM@environment-agency.gov.uk	Noted.
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 & have not read.</p> <p>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"> - 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>' - 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' <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>	<p>Noted.</p> <p>The essence of Green Infrastructure is that it provides multi-functional benefits.</p> <p>This is acknowledged as a gap. The Council is currently collaborating with the Jockey Club Estates and Lambourn Parish Council to provide further evidence with regard to the racehorse industry. Additional wording has been added to the sections on Tourism and Green Infrastructure to better express the</p>

Respondent	Summary of Response	Council Response
		benefits of horse riding to the economy and health and wellbeing.
British Horse Society	<p>There is little baseline data included to support the inclusion of the Equestrian / Racehorse Industry (commonly called the Horse Industry). 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. 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. The non-racing horse industry (as well as the horse racing industry) makes a significant contribution to the economy, to employment, land use & leisure activities in West Berks and to the health & well-being of a wide age range of the population. 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 & bridleways officers to respond to development plans 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 & 11 in 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). 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> <ul style="list-style-type: none"> i. the horse Industry contributes to 'Communities and Well Being' and 'Economy and Infrastructure' listed on page 9. 	This is acknowledged as a gap. Additional wording has been added to the sections on Tourism and Green Infrastructure to better express the benefits of horse riding to the economy and health and wellbeing.

Respondent	Summary of Response	Council Response
	<p>ii. We are pleased to see on page 102 the need for improved equestrian access. We fully endorse this and believe the Mid & West Berks Local Access Forum also supports this.</p> <p>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 not 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.</p> <p>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.</p>	<p>Text amended. From "where the majority of people will be located in the future" to "where the majority of people can gain access in the future".</p>

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	Council Response
Mr Francis Connolly	Not to my knowledge	Noted.
Mr 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><i>Note that this stage is looking at the scope of the review only. The draft Local Plan and policies have yet to be produced.</i></p> <p>The guarantee requested is beyond the scope of a local plan sustainability appraisal as house prices are a product of variables many of which are outside the sphere of influence of the Local Plan. The basis for the Plan will be the Berkshire SHMA and its objectively assessed need (OAN) for housing of all types and sizes before finalising figures during the planning process, including any changes in methodology for OAN. The SHMA included a review of house prices and their rates of change, and projections of trends based on demographics, employment trends, market signals and the need for affordable housing.</p>

Respondent	Summary of Response	Council Response
	<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>	<p>Local Plans must be deliverable within the chosen time period. Levels of uncertainty and unforeseen events increase over time, indeed the proposed new NPPF requires local plan policies to be reviewed at least once every 5 years to ensure it remains current and up to date.</p> <p>The Sustainability Appraisal Scoping Report does not mention Grazeley. Please refer to paragraphs 5.7 and 5.8 of the West Berkshire Local Plan Review to 2036 Scoping ('Regulation 18') Scoping Report and associated consultation responses for further details.</p>

Respondent	Summary of Response	Council Response
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.	Noted.
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.	Housing numbers inside and outside the AONB are included in the Council's Annual Monitoring Reports.
Joy and Marc Schlaudraff	<p>Yes.</p> <p>There are many unidentified sites, because there are no free or cheap assessments by the council</p>	<p>Between December 2016 and March 2017 we invited landowners, developers and others to submit potential development sites for us to consider as part of the Housing and Economic Land Availability Assessment that we will be publishing in autumn 2018. We continued to accept sites for consideration for a further year. The HELAA is a technical assessment, not a policy-making document. It will not make recommendations on which sites should be developed but will make a preliminary assessment of their suitability and potential. The information we gather from this process will help inform our new Local Plan which will allocate sites for housing and economic development to cover the period up to 2037.</p>
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	Noted and will be considered in the development of the spatial strategy.

Respondent	Summary of Response	Council Response
	<p>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>	<p>The SHMA has reviewed the affordable housing need and it is included in Appendix 2 under <i>Housing</i>. To supplement, an affordable housing viability assessment has been completed.</p>
<p>Pegasus Planning Group Ltd for Donnington New Homes</p>	<p>No – I am not aware of any additional baseline data which should be added to that listed.</p>	<p>Noted.</p>
<p>Stratfield Mortimer Parish Council</p>	<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>Population</p> <ul style="list-style-type: none"> • 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? • 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. <p>Health</p> <ul style="list-style-type: none"> • There is virtually nothing in this section about mental health • There seem to be a mix of value judgements and statistics that reduce the section's impact. • There does not seem to be any information on NHS and other health providers plans 	<p>The section on 'population' needs to be read in conjunction with the section on 'housing'. Appendix 2 under housing makes extensive reference to the Strategic Housing Marketing Assessment which analysed in detail the different needs of the market for housing, including demographic need, market signals, the need for different sizes of housing and of particular groups such as the elderly. Additional text to both sections has been added to make this clearer.</p> <p>Some of these points fall outside the scope of the sustainability appraisal.</p>

Respondent	Summary of Response	Council Response
	<ul style="list-style-type: none"> • There is little or no background on trends in delivery of medical services such as the use of remote monitoring of conditions • There is very little on the impact of environmental conditions on health or indeed cross-referencing to other issues • Again this last issue is prevalent through all of this appendix <p>Air Quality</p> <ul style="list-style-type: none"> • Should there not be a data set on health and air quality? <p>Education</p> <ul style="list-style-type: none"> • There is no mention of changing educational practices such as internet learning • There is no mention of apprenticeships and this route to qualifications • There is no mention of the need to retrain for different jobs as the ‘job for life’ disappears. • 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. • There is little or no cross referencing to other sections where education is important such as Health <p>Housing</p> <ul style="list-style-type: none"> • There does not seem to be any data on housing construction such as the increasing use of factory built homes. • Nor does there seem to be any data on the type of buildings required to minimise the environmental footprint of housing 	<p>The information is proportionate to the scope of the local plan review.</p> <p>The report concludes with identifying the need for West Berkshire to explore the link between the District’s health and air quality.</p> <p>These points mostly fall outside the scope of this report. For instance, the method by which education is practiced falls beyond the scope of a sustainability appraisal.</p> <p>The ‘Health’ section makes reference to “local strategies and plans to promote healthier lifestyles” but reference to the District’s Health and Wellbeing in Schools Programme has been added to illustrate the point, and a new paragraph is added at the beginning of the section.</p> <p>The type and method of construction will evolve over the period of the Local Plan. The Plan will address environment constraints to and opportunities for all</p>

Respondent	Summary of Response	Council Response
	<ul style="list-style-type: none"> • Little cross-referencing to other issues such as flooding <p>Deprivation</p> <ul style="list-style-type: none"> • No comment <p>Crime</p> <ul style="list-style-type: none"> • 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. <p>Sport</p> <ul style="list-style-type: none"> • Mortimer has commissioned a consultant to report on sport in and around the parish and this can be made available if required. • There are no figures showing the correlation between sporting activity and health, especially for the older members of society • 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. • There is no mention of the myriad of clubs that cater for specific interests from gardening to chess. • There is no mention of informal leisure facilities such as recreation grounds and open countryside 	<p>types of development in policy terms as evidenced in sections such as flooding, energy, landscape and biodiversity etc., translated into key environmental issues and sustainability objectives.</p> <p>Noted. The caution needed with regard to the completeness, method of reporting and non-reported crime is noted, including the Crime in England and Wales 2017 bulletin. The Council believes the local police crime statistics and community safety data are more appropriate to the Local Plan preparation.</p> <p>Noted.</p>

Respondent	Summary of Response	Council Response
	<p>Landscape</p> <ul style="list-style-type: none"> • There is no mention of landscape as an aid to better health • The characterization of landscape into the very broad categories does not do justice to the very varied landscapes held within each category • There is a presumption that this only concerns the rural areas. Surely the urban landscape is just as important? <p>Geology</p> <ul style="list-style-type: none"> • Would it be appropriate to deal with Hydrology in this section? <p>Historic environment</p> <ul style="list-style-type: none"> • No comment <p>Commons</p> <ul style="list-style-type: none"> • No comment <p>Biodiversity</p> <ul style="list-style-type: none"> • There does not seem to be any information on the overall current state of biodiversity. 	<p>Mentioned in the section on 'Green Infrastructure' more generally. The urban landscape is considered in relation to the 'Historic Environment' and 'Green Infrastructure'.</p> <p>Addressed in relation to sections on 'Water Supply' and 'Flood Risk'.</p> <p>Noted.</p> <p>Noted.</p> <p>No 'State of Nature' Report has been produced as such.</p>

Respondent	Summary of Response	Council Response
	<ul style="list-style-type: none"> • The emphasis is all on protected areas and species. It is believed that WBC hold records of species identified in the District. • Should the Lawton report be mentioned? <p>Green Infrastructure</p> <ul style="list-style-type: none"> • Should designated Green Spaces be mentioned and how many there are in the District? <p>Climate</p> <ul style="list-style-type: none"> • There is no mention of the likely impact that climate change will have on health. <p>Water quality and contaminated land</p> <ul style="list-style-type: none"> • Should the future trends cross-reference to climate change? <p>Water supply</p> <ul style="list-style-type: none"> • No comment <p>Flood risk</p> <ul style="list-style-type: none"> • 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 	<p>Other sites and other species are mentioned but not catalogued.</p> <p>Text added linking the Lawton Report to the Berkshire Biodiversity Strategy and 'BOA'.</p> <p>Text added to section. Stratfield Mortimer have the only designations so far.</p> <p>Text added to 'Climate Change' section.</p> <p>Not clear from the evidence except in relation to possible increased risk of disease from flooding.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. The policy will take account of the Council's Strategic Flood Risk Assessment.</p>

Respondent	Summary of Response	Council Response
	<p>storm. It is considered that these events need to be considered when assessing the sustainability of any policy or proposal.</p> <p>Soil</p> <ul style="list-style-type: none"> • No comment <p>Minerals</p> <ul style="list-style-type: none"> • No comment <p>Waste</p> <ul style="list-style-type: none"> • No comment <p>Renewable energy</p> <ul style="list-style-type: none"> • 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. <p>Economy</p> <ul style="list-style-type: none"> • There is mention of the road network but not the rail network. • There is no mention of broadband provision which is now an exceptionally important determinant of good prospects for the economy of an area. • There is no mention of the problems faced due to increased congestion on all transport networks or the opportunities offered by rail electrification • There is little or no cross-referencing to other sections such as education and health 	<p>Noted</p> <p>Noted</p> <p>Noted.</p> <p>Noted.</p> <p>Text added to section under 'Renewable Energy' to account for this point and update to include implications of the Clean Growth Strategy.</p> <p>Text added regarding rail under 'Transport'.</p> <p>See reference under 'Transport'</p> <p>Text added under 'Economy' in recognition of technological change in</p>

Respondent	Summary of Response	Council Response
	<ul style="list-style-type: none"> • There seems to be no recognition of how work will change due to greatly increased use of Artificial Intelligence <p>Tourism</p> <ul style="list-style-type: none"> • No comment <p>Agriculture</p> <ul style="list-style-type: none"> • 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? • <p>Transport</p> <ul style="list-style-type: none"> • There is no mention of the impact of the increasing use of electric vehicles on transport or indeed the use of autonomous vehicles. • The mention of reductions in usage by home working is welcomed but this depends on good access to broadband and this is not mentioned. • There is mention of the encouragement of active transport modes but very little information on the location of this. • 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. • There is little or no mention of freight transport 	<p>the future challenging the ways in which we work.</p> <p>Noted.</p> <p>Brexit is mentioned in the main report as an overarching issue and not repeated in every section. It is mentioned here as the whole industry is so governed by EU regulation and payments.</p> <p>The Council has no evidence to measure the impact of alternatively powered transportation. Recognition of the change has been added under 'Economy'.</p> <p>Noted.</p> <p>The report does not go into this level of detail but makes reference to the Local Transport Plan.</p> <p>Noted.</p>
Carter Planning for Mr R.L.A. Jones	No but any future Neighbourhood Plans will need to be included	Noted.

Respondent	Summary of Response	Council Response
Burghfield Parish Council	No	Noted.
Burghfield NDP Steering Group	No	Noted.
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.	Baseline report acknowledges lack of data on contribution of horse racing to the local economy.
Turley Associates 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"> • The latest evidence on West Berkshire's economy and the conclusions of the Economic Development Needs Assessment (EDNA) • 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. 	<p>Confirmed.</p> <p>Text added to the Economy section of Appendix 2 with regard to additional employment land and notes that further work is being done to refine the requirement.</p>
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:</p> <p><i>Housing for Older People, Second Report of Session 2017-19; Communities and Local Government Committee (5 February 2018).</i></p>	Reference added to Appendix 2 under "Population".
Woolf Bond Planning for	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	Noted. The Council will be reviewing the settlement hierarchy and settlement boundaries which will include

Respondent	Summary of Response	Council Response
Donnington New Homes	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>consideration of the needs of more rural parts of the District.</p> <p>The SHMA has reviewed the affordable housing need and it is included in Appendix 2 under <i>Housing</i>. To supplement, an affordable housing viability assessment has been completed.</p>
Pegasus Planning Group Ltd for Donnington New Homes	No – I am not aware of any additional baseline data which should be added to that listed.	Noted.
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.	Noted.
Transport Team, West Berkshire District 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 & 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>	Text amended to include these additional services.

Respondent	Summary of Response	Council Response
	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.	
Mid & West Berks Local Access Forum	Not that we are aware of but see answer to Q2.	Noted.
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>West Berks-Specific data:</p> <p>1. The National Equine Database / Central Equine database.</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 https://data.gov.uk/dataset/national-equine-database-ned</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 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.</p> <p>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>2. Conduct a survey / snapshot of equestrian enterprises in West Berkshire.</p>	The Scoping Report draws upon existing baseline information available for West Berkshire at this time. The Council is currently collaborating with the Jockey Club Estates and Lambourn Parish Council to provide further evidence with regard to the racehorse industry.

Respondent	Summary of Response	Council Response
	<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> <ul style="list-style-type: none"> (i) there are at least 4 large equestrian veterinary practices in West Berks. These might be a source of the number of horses kept to owners with West Berks postcodes. (ii) a ridden horse will usually be shod by a registered farrier 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. (iii) Licensed riding schools: these may seriously underestimate the horse population if they do not include livery yards and private premises <p>3. For the importance / economic value of horse racing in West Berks, the British Horse Racing Board may be a source of information.</p> <p>National data:</p> <p>We are aware of the following:</p> <ul style="list-style-type: none"> 1. British Equestrian Trade Association's National Equestrian Survey 2015 http://www.beta-uk.org/pages/industry-information/market-information.php <p>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. Riding for pleasure, at 96%, was the most popular equestrian activity, with 59% of riders taking part in non-affiliated competitions.'</i></p>	

Respondent	Summary of Response	Council Response
	<p>It may be that BETA may have data specific to West Berkshire which it may release on application</p> <p>2. British Horse Industry Confederation reports published 2004 /2005.</p> <p>a. https://www.gov.uk/government/publications/a-report-of-research-on-the-horse-industry-in-great-britain. See the diagrams on pages 10 & 11 which depict the breadth of the Horse industry which also will relate to West Berks.</p> <p>b. A summary this report is available at http://www.ridingsafely.net/defrabhicssummary1.html. I have a paper copy</p> <p>c. Strategy for the Horse Industry in England & Wales https://www.gov.uk/government/publications/strategy-for-the-horse-industry-in-england-and-wales</p> <p>3. The Health Benefits of Horse Riding</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 http://www.bhs.org.uk/enjoy-riding/health-benefits</p> <p>4. https://www.lantra.co.uk/ 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>	<p>Text added to generally link health outcomes with other sustainability issues including recreational provision, particularly as provided by green infrastructure.</p>

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	Council 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.	Noted.
Carter Planning for Mr R.L.A Jones	No.	Noted
Burghfield Parish Council	No	Noted
Burghfield NDP Steering Group	No	Noted
North Wessex Downs AONB	No	Noted
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	Noted.
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.	The SHMA has reviewed the affordable housing need and it is included in Appendix 2 under <i>Housing</i> . To supplement, an affordable housing viability assessment has been completed.
Pegasus Planning Group Ltd for Donnington New Homes	No – I am unaware of any inaccuracies or anomalies in the data.	Noted

Respondent	Summary of Response	Council Response
Archaeology Team West Berkshire Council	I believe the historic environment section is reasonably accurate – but NB the HER is continually being updated.	Noted.
Public Transport Team, West Berkshire Council	No	Noted.
Mr Francis Connolly	Not to my knowledge	Noted.
Mr 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><u>Note that this stage is looking at the scope of the review only. The draft Local Plan and policies have yet to be produced.</u></p> <p>The guarantee requested is beyond the scope of a local plan sustainability appraisal as house prices are a product of variables many of which are outside the sphere of influence of the Local Plan. The basis for the Plan will be the Berkshire SHMA and its objectively assessed need (OAN) for housing of all types and sizes before finalising figures during the planning process, including any changes in methodology for OAN. The SHMA included a review of house prices and their rates of change, and projections of trends based on demographics, employment trends, market signals and the need for affordable housing.</p>

Respondent	Summary of Response	Council Response
	<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>	<p>Local Plans must be deliverable within the chosen time period. Levels of uncertainty and unforeseen events increase over time, indeed the proposed new NPPF requires local plan policies to be reviewed at least once every 5 years to ensure it remains current and up to date.</p>
West Waddy ADP for Gerald Palmer Eling Trust	No	Noted.
Joy and Marc 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>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

Respondent	Summary of Response	Council Response
Mid & West Berks Local Access Forum	Not that we are aware of but we are not familiar with a number of the documents listed.	Noted.
British Horse Society	Not as far as the Society is aware.	Noted.

Q5: Do you agree that these are the key sustainability issues for the West Berkshire Local Plan Review?

Number of responses: 21

Respondent	Summary of Response	
Stratfield Mortimer Parish Council	Please see response to question 3	See Council response to Q3.
Carter Planning for Mr RLA Jones	<p>Yes – the key sustainability issue is future housing needs and how they will be met.</p> <p>Perhaps Housing should be a specific Thematic Topic rather than being part of Communities and Well Being.</p> <p>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.</p>	<p>Noted.</p> <p>Text regarding overall housing need added to Table 2 in the main report under <i>Housing</i>.</p>
Burghfield Parish Council	<p>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.</p> <p>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.</p>	<p>Noted.</p> <p>Noted. The Sustainability Appraisal Objectives in the report include reduction of waste and managing their use efficiently.</p>
Burghfield NDP Steering Group	<p>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.</p> <p>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.</p>	<p>Noted.</p> <p>The Sustainability Appraisal Objectives in include reduction of waste and managing their use efficiently.</p>
North Wessex Downs AONB	No. Landscape pressure should also include climate change and biodiversity should include flooding.	Text amended.

Respondent	Summary of Response	
Turley Associates for North East Thatcham Consortium	<p>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.</p> <p>The Consortium acknowledges that any new baseline data may warrant a further review of the key sustainability issues.</p>	Noted.
Woolf Bond Planning for Donnington New Homes	We agree these sustainability objectives are appropriate.	Noted.
Pegasus Planning Group Ltd 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.	Noted.
Archaeology Team West Berkshire Council	<p>Under Landscape, Townscape and Cultural Heritage -</p> <p>Landscape – agree with these</p> <p>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</p> <p>“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>	<p>Text amended.</p> <p>Text amended.</p> <p>Text deleted.</p>

Respondent	Summary of Response	
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>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
Mr Francis Connolly	<ul style="list-style-type: none"> • Generally yes • 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) • Greater commitment to affordable and starter homes with guarantees on delivery 	<p>Noted.</p> <p>Should it be concluded that this area does have the potential to deliver a major housing and mixed use development, the final number will be subject to further assessment through the plan preparation process.</p>
Hampshire County Council	We agree that the issues outlined in Appendix 2 are key sustainability issues for the West Berkshire Local Plan Review.	Noted.
Mr 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</p>	

Respondent	Summary of Response	
	<p>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>	<p>Local Plans must be deliverable within the chosen time period. Levels of uncertainty and unforeseen events increase over time, indeed the proposed new NPPF requires local plan policies to be reviewed at least once every 5 years to ensure it remains current and up to date.</p>
<p>Thatcham Town Council</p>	<p>Yes</p>	<p>Noted.</p>
<p>West Waddy ADP for Gerald Palmer Eling Trust</p>	<p>Yes, particularly the comment on housing, which states that:</p> <p><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></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</p>	<p>Noted.</p>

Respondent	Summary of Response	
	can be done will be the Settlement Boundary Review, which is still to be undertaken and therefore needs to be a priority.	
Joy and Marc Schlaudraff	<p>Yes, but there is far too much emphasis on key point 1 which is blocking nearly all development.</p> <p>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>	Noted.
Woolf Bond Planning for Donnington New Homes	We agree these sustainability objectives are appropriate.	Noted.
Pegasus Planning Group Ltd 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 when considering the key sustainability issues. This is because they have been given continuing or increased significance in the revised NPPF.	Noted.
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.	The issue is addressed more generically in terms of ecosystems, species and habitats. This level of detail would invite a long list.
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.	Noted. Green infrastructure and Biodiversity are considered jointly as thematic topics but they are translated into separate sustainability appraisal objectives later in the main report.
British Horse Society	<p>Yes, they seem appropriate.</p> <p>We note reference to equestrian sporting prowess under 'Landscape, Townscape and Cultural Heritage' and draw your attention to points above on how data might be collected, if required.</p>	<p>Noted.</p> <p>Noted.</p>

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	Council Response
Mr Francis Connolly	<ul style="list-style-type: none"> The Greater Reading Area (West Berks, RBC and Wokingham BC) development should be planned comprehensively South Newbury development should also consider the adjacent North Hampshire area. 	Noted.
Mr 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>	<p>Noted.</p> <p>Local Plans must be deliverable within the chosen time period. Levels of uncertainty and unforeseen events increase over time, indeed the proposed new NPPF requires local plan policies to be reviewed at least once every 5 years to ensure it remains current and up to date.</p>
Thatcham Town Council	<p>Inclusion of 'Provision for Young People' as a sustainability issue</p> <p>'Affordable Housing' as a separate issue that is distinct from wider 'Housing'</p>	Although under the banner of 'Housing' the scoping report and baseline information makes a clear distinction between the

Respondent	Summary of Response	Council Response
	'Flood Risk' to also incorporate 'Flood Prevention'	different needs for accommodation as assessed by the SHMA. Text amended to include alleviation.
West Waddy ADP for Gerald Palmer Eling Trust	No	Noted.
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.</p> <p>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.</p> <p>It is believed that the proposed urban extension at Sandford Park South can make an important contribution to addressing these issues and meeting the SA Objectives. The development of Sandford Park, as set out in adopted policy CS3 and the Sandford 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 routeing through the site from Monks Lane to Andover Road.</p> <p>The proposed southern extension to Sandford 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 Sandford Park. <i>[Please see attached document for further details of the site]</i></p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
Joy and Marc Schlaudraff	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.	

Respondent	Summary of Response	Council Response
	<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.</p> <p>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>	Noted.
Woolf Bond Planning for Donnington New Homes	We agree these sustainability objectives are appropriate.	Noted.
Pegasus Planning Group Ltd for Donnington New Homes	No – I am not aware of any issues that should be added or removed.	Noted.
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.	The issue is addressed more generically in terms of ecosystems, species and habitats.
Mr 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	These issues are addressed by the Minerals and Waste Local Plan that is in preparation, which includes objectives for sustainable locations with respect to flooding and the avoidance of harm to the North Wessex Downs AONB, Scheduled Monuments, Special Areas of Conservation and other interests of acknowledged importance. The Scoping Report for the Local Plan Review, similarly includes sustainability objectives for the protection and conservation of landscape and water amongst others.

Respondent	Summary of Response	Council Response
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.	See Council response in Q3.
Carter Planning for Mr R.L.A. Jones	No.	Noted.
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.	Noted.
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.	Noted.
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.	Text amended to include existing routes and links.
Turley Associates 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"> • Communities and Well Being (Education/ Skills) – There is an acute need for additional Primary and Secondary School places within Newbury and Thatcham • • 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 • 	<p>Text added to Education Issues in the main report to emphasise need. Text added to reflect the broader outcomes of the collaboration between West of Berkshire authorities. The opportunities to address deprivation needs to be taken across the District and is not exclusive to Newbury and Thatcham. Noted. Text added to Climate Change issues to include reference to ‘sustainable locations’.</p>

Respondent	Summary of Response	Council Response
	<ul style="list-style-type: none"> • 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 • 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. • 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. • 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 • 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. 	<p>Noted.</p> <p>Text added to Appendix 2 and Sustainability Issues in the main report to show links between transport and the location of sustainable developments.</p>
<p>Planning Transport Team, West Berkshire District Council</p>	<p>No</p>	<p>Noted.</p>
<p>Mid & West Berks Local Access Forum</p>	<p>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.</p>	<p>Noted. Text added.</p>
<p>British Horse Society</p>	<p>It is essential that the horse industry is fully recognized, based on sound evidence, as contributing to the economy, leisure & recreation, health and well-being in all the appropriate local plans IF it is to thrive and continue to contribute to the West Berks economy.</p>	<p>Noted.</p>

Respondent	Summary of Response	Council Response
	<p>Plans need to refer to the provision 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.</p> <p>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 & Local Development Plan. Walking & 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 (http://hallplaceequestriancentre.co.uk). Another is the carriage driving centre at Sheldon Farm, Tidmarsh and Celebration Carriages at Poplar Farm, Cold Ash (http://www.celebration-carriages.co.uk). Such establishments need recognition & protection as they contribute to the economy, employment, health & well-being of the human population.</p>	

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

Number of responses received: 19

Respondent	Summary of Response	
Mr Francis Connolly	As my answer under question 6 for the area south of M4 J11	Noted.
Hampshire County Council	Yes, the objectives are suitable in the context of the WBLP Review.	Noted
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>	<p>Noted</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>

Respondent	Summary of Response	
West Waddy ADP for Gerald Palmer Eling Trust	Yes	Noted.
Joy and Marc 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.	Noted.
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.	Noted.
Pegasus Planning Group Ltd for Donnington New Homes	Yes – these objectives appear suitable in the context of the review.	Noted.
West Berkshire Council Energy Team	<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"> a) To reduce Energy Use (reduce Kwh), b) Promote the use of new or preferred energy technologies ('Smart' towns) c) Promote the use of renewable energy generation and energy storage 	<p>Indicators for LEV and charge points added to Objective 9.</p> <p>Indicators added.</p>
Stratfield Mortimer Parish Council	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>Noted.</p> <p>Noted. An objective to minimise is not sufficiently specific or measurable. This</p>

Respondent	Summary of Response	
	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. Similarly should not the objective about emissions start off with eliminating the need for unnecessary emissions before going any further?	objective seeks to positively provide the means to reduce the need to travel. The objective is in line with UK commitments to reduce emissions by 80% by 2050. Should the UK change the target, the Local Plan will take the change into account.
Carter Planning for Mr R.L.A. Jones	Yes. As stated meeting housing needs is considered to be the single most important objective in the District. We support the Number 1 SA Objective being the provision of housing to meet identified needs in sustainable locations.	Noted.
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.	Noted.
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 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.	Noted.
North Wessex Downs AONB	Yes, how the objectives will be achieved is another matter.	Noted.
Turley Associates 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.	Noted. Noted.
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	Where a number of topics have objectives in common such as ‘character and distinctiveness’ and ‘conserve and enhance’

Respondent	Summary of Response	
	<p>separate consideration. There is a danger that conflating the two could mask effects on one or the other.</p> <p>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).</p>	<p>here then they have been include in a headline objective. However each have their separate clear sub-objectives and indicators.</p> <p>There is a suggested indicator of enhancement of the significance in relation to major developments.</p>
	<p>Yes – these objectives appear suitable in the context of the review.</p>	<p>Noted.</p>
<p>West Berkshire Council Archaeology Team</p>	<p>‘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</p>	<p>The text follows that used in the NPPF. ‘Built environment’ goes beyond that which is historic.</p>
<p>Mid & West Berks Local Access Forum</p>	<p>They seem so. We particularly support inclusion of objective H ‘Green Infrastructure & healthy Living’ as a distinct objective.</p>	<p>Noted.</p>
<p>British Horse Society</p>	<p>Yes</p>	<p>Noted.</p>

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	Council Response
Mr Francis Connolly	Not at present	Noted.
Mr 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>	Noted.
	<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>	Noted.
	<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>	Noted.
	<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.</p>	Noted.

Respondent	Summary of Response	Council Response
	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.	
West Waddy ADP for Gerald Palmer Eling Trust	Not that I am aware of.	Noted.
Joy and Marc 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>	<p>Noted.</p> <p>Noted.</p> <p>The Council believes the provision of housing to meet identified need is essential.</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.	Noted.
Pegasus Planning Group Ltd 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.	This would be a policy consideration for the objectives of the Local Plan Review. The sector would fall within Objective 10 with respect to supporting key sectors as part of realising a strong, diverse and sustainable economic base.
Mr Julian Worth	Reduction and elimination of mineral extraction which is a highly damaging and unsustainable activity	Noted.

Respondent	Summary of Response	Council Response
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 determine if there are any missing objectives because the totality of the aim of the analysis is not stated.</p> <p>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.</p>	<p>The purpose and scope of the Report is set out in the main body of the Report.</p> <p>Health and well-being is addressed as an objective. The Council does not have practicable means to measure happiness and community spirit. However, the objectives and indicators do address contributory factors such as providing needed housing, improving access to community infrastructure, reducing fear of crime, availability of transport, conserving and enhancing the environment and heritage.</p>
Carter Planning for Mr R.L.A. Jones	No.	Noted.
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.....".	The sub-objectives define the character and distinctiveness ie biodiversity, landscape and historic environment which lead to specific indicators of those features or assets.
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.....".	The sub-objectives define the character and distinctiveness ie biodiversity, landscape and historic environment which lead to specific indicators for each of those features or assets.
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.	Text amended.

Respondent	Summary of Response	Council Response
	<p>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.</p> <p>Objective G should include environment in the title</p>	<p>Text added.</p> <p>Noted for the Local Plan Review Scoping Report consultation response.</p>
<p>Turley Associates for North East Thatcham Consortium</p>	<p>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:</p> <ul style="list-style-type: none"> • SA Objective 1-New Sub objective: The Consortium suggests the inclusion of a new sub-objective as follows; <ul style="list-style-type: none"> ○ 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"> ▪ 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 • SA Objective 2:- New Sub objective: The Consortium suggests the inclusion of a new sub- objective as follows; <ul style="list-style-type: none"> ○ To tackle deprivation and inequality in the District <ul style="list-style-type: none"> ▪ Suggested Indicators – Proximity to deprived areas; the use of specific measures to tackle deprivation including employment and training opportunities 	<p>The Sustainability Appraisal objectives need to read as a whole when considering a sustainable development. Thus, the table includes objectives and indicators that address sustainable travel of all forms, access to community infrastructure etc. The suggested indicator regarding allocation is a policy matter to be decided.</p> <p>The Sustainability Appraisal objectives need to read as a whole when considering a sustainable development. Thus, the table includes objectives and indicators that address sustainable travel of all forms, access to community infrastructure, encouragement of employment opportunities and provision of affordable housing etc</p> <p>Noted, however this indicator is too restrictive. Suggested alternative is,</p>

Respondent	Summary of Response	Council Response
	<ul style="list-style-type: none"> • SA Objective 3- New Indicator: 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"> ○ Number of new primary or secondary school places provided by the proposed development • SA Objective 4 – New Indicator: 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"> ○ Percentage of new development within walking or cycling distance of a train station • SA Objective New Indicator: The Consortium suggests the following indicator <ul style="list-style-type: none"> ○ Percentage of new development within walking or cycling distance from an existing town centre • SA Objective 8 – Amendments to existing indicators: 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"> ○ % of commercial buildings meeting either BREEAM Very Good or Excellent standard ○ % of energy generated from renewable or low carbon energy sources <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.</p>	<p>“Percentage of the Community Infrastructure Levy expended on elements of community infrastructure.”</p> <p>This indicator is too restrictive and lacks definition of ‘distance’ which would be highly variable according to ability.</p> <p>An alternative indicator is suggested:</p> <p>“Percentage of new developments that connect to the local walking and cycling networks.”</p> <p>Text amended.</p> <p>Noted.</p>

Respondent	Summary of Response	Council Response
	<p>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.</p> <p>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>	<p>Noted</p> <p>The SA is conducted prior to constraint of policy.</p>
<p>Pro Vision for Audley Group</p>	<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> <p>The benefit of appropriate development in the rural areas should not be underestimated. Paragraph 28 of the NPPF states that LPAs should:</p> <p>“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</p> <p>“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</i></p>	<p>Noted. The issue of distinguishing between spatial areas, whether by geography or primary land use, will be taken forward as the Local Plan Review progresses.</p>

Respondent	Summary of Response	Council Response
	<p><i>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.	Noted.
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>	Text amended. Noted. To be considered further as part of the Council’s response to the Local Plan Review Scoping Report consultation.
Pegasus Planning Group Ltd for Donnington New Homes	No- we are not aware of any additional objectives that should either be included or removed.	Noted.
West Berkshire Council Archaeology Team	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.	Noted.
West Berkshire District Council Transport Team	No	Noted.
Mid & West Berks Local Access Forum	Nothing has come to mind so far.	Noted.

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	Council Response
Mr Francis Connolly	Most important is to ensure deliverability	Noted.
Mr 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</p>	Noted.

Respondent	Summary of Response	Council Response
	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.	
Thatcham Town Council	Housing should be a priority given the national need for more house building.	Noted.
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.	Noted.
Joy and Marc 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> <p>The objectives are right in the main, but should read from bottom to top, not top to bottom.</p> <p>They should read:</p> <p>Economy and Infrastructure</p> <p>Communities and Wellbeing</p> <p>Climate change and resource efficiency</p> <p>Biodiversity and green infrastructure</p> <p>Landscape, townscape and cultural heritage</p>	<p>Noted.</p> <p>Noted. The thematic topics are not ranked.</p>

Respondent	Summary of Response	Council Response
	<p>Read them through in that order, and it all makes more sense. This would be far more successful and address needs quickly.</p> <p>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	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.	Noted.
Pegasus Planning Group Ltd 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>	<p>Noted.</p> <p>Indicator for older people housing added.</p> <p>Noted.</p> <p>Noted.</p>

Respondent	Summary of Response	Council Response
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> <p>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.</p>	Noted for policy formulation.
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.	Noted.
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.	Noted.
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.	Noted.
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.	Noted.
Turley Associates 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</p>	Noted. Ranking difficult within 3 pillars of sustainable development.

Respondent	Summary of Response	Council Response
	<p>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>	<p>Noted. 'Methodology and conclusion of each stage of the Local Plan Review [must] be transparent...'</p> <p>Noted.</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 prioritise this issue is likely to have a significantly detrimental affect on the overall housing provision, health and social well-being in the district.	Noted. Indicator for housing for older people added.
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.	Noted.
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.	Noted.
Pegasus Planning Group Ltd for	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	Noted.

Respondent	Summary of Response	Council Response
British Horse Society	We are not sure this is a valuable exercise as each objective is important in its own right.	Noted.

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	Council Responses
Mr Francis Connolly	Generally yes	
Mr 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>	Noted.
	<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>	Noted.
	<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>	Noted.
<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>	Noted.	
<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</p>	Noted.	

Respondent	Summary of Responses	Council Responses
	<p>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>	
<p>West Waddy ADP for Gerald Palmer Eling Trust</p>	<p>The housing indicators are:</p> <ul style="list-style-type: none"> • No of housing completions • Affordable housing completions • Housing mix by type and size <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>	<p>Text amended. The Annual Monitoring Report does report by spatial area and in total.</p>
<p>Joy and Marc Schlaudraff</p>	<p>Yes and no.</p> <p>The lower objectives should have a higher priority as before said, and the objectives should be ranked differently.</p> <p>Bottom to top.</p> <p>And the first objective should be left off, as we are giving it far too great place.</p>	<p>Noted.</p>
<p>Woolf Bond Planning for Donnington New Homes</p>	<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>	<p>Noted.</p>
<p>Pegasus Planning Group Ltd for Donnington New Homes</p>	<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.</p> <p>Objective 2(3), 'To enable the protection and enhancement of high quality multifunctional green</p>	

Respondent	Summary of Responses	Council Responses
	<p>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>	<p>Allotments are part of green space and an additional indicator is not considered necessary.</p>
<p>Environment Agency</p>	<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,</p> <p>"No of planning permissions granted contrary to the advice of the Environment Agency on flood defence grounds"</p> <p>We think this should read:</p> <p>"No of planning permissions granted contrary to the advice of the Environment Agency on flood risk grounds"</p> <p>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.</p> <p>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.</p> <p>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>	<p>Text amended.</p> <p>Indicator added.</p> <p>The suggestion is an objective. Various indicators for biodiversity are included to cover habitats and species across the District.</p>
<p>West Berkshire Council Energy Team</p>	<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</p>	<p>The suggested indicator to test affordability to run a house is beyond the scope of the sustainability appraisal and it is reasonable</p>

Respondent	Summary of Responses	Council Responses
	<p>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> <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:</p> <p>"Number of EVs registered in WBC"</p> <p>"Number of public charging points available in West Berks"</p> <p>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:</p> <p>"% of total energy consumption for the district coming from local renewable energy generation" OR</p> <p>"% of the total energy consumption for the housing development coming from on-site renewable energy generation".</p>	<p>to expect that any assessment by a lender would establish affordability.</p> <p>Indicators added.</p> <p>Indicator amended as suggested for District.</p>
Mr Julian Worth	Reducing tonnage of minerals extracted in West Berks, year-on-year	Indicator already included as 'annual primary production'.
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.</p> <p>Some of the objectives do not seem to be consistent across the page. For instance</p>	

Respondent	Summary of Responses	Council Responses
	<p>7: To promote and improve the efficiency of land use.</p> <p>To maximise the use of previously developed land and buildings where appropriate</p> <ul style="list-style-type: none"> • Percentage of major residential developments completed at: <ul style="list-style-type: none"> i) less than 30dph; ii) between 30 and 50 dph; iii) above 50 dph • Percentage of new or converted dwellings and non-residential developments on previously developed land • Area of registered brownfield sites suitable and available for residential development <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>	<p>Material Assets</p> <p>Soil</p> <p>A sub-objective relating to density has been added to separate the indicators of efficient use of land.</p>

Respondent	Summary of Responses	Council Responses
	<p>To reduce water consumption and promote reuse</p> <ul style="list-style-type: none"> • Percentage of development incorporating water conservation and/or water efficiency measures • New Developments with SUDs installed (EA) <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?</p>	<p>Noted. The SuDS indicator also relates to the re-use of water to manage for multiple benefits such as filtration, water storage, the creation of green/blue amenity space and biodiversity value, as well as providing effective surface water drainage.</p> <p>The 'input' indicator is related to the input of developments and their contribution to the reduction in consumption. An indicator measuring amount consumed per capita has been added.</p> <p>Indicator measuring developments in Flood Zone 3 has been added. However,</p>

Respondent	Summary of Responses	Council Responses
	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.	indications need to be considered together not in isolation. The Local Plan includes positive opportunities for a whole area that are generated by new development and partnerships to deliver infrastructure and other benefits to the wider community.
Carter Planning for Mr R.L.A. Jones	Yes	Noted.
Burghfield Parish Council	The list looks pretty comprehensive.	Noted.
Burghfield NDP Steering Group	The list looks pretty comprehensive.	Noted.
North Wessex Downs AONB	Think the indicators suggested will provide a basic baseline for the future SA/SEA	Noted.
Turley Associates for North East Thatcham Consortium	Please see the Consortiums response to Question 8.	Please see responses in Q8.
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 <i>including Use Class C2</i> ” (our emphasis).	Indicator added.
Woolf Bond Planning for	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	Noted.

Respondent	Summary of Responses	Council Responses
Donnington New Homes	and affordable housing up to 2036 and the need to provide a mix of house sizes, types and tenures.	
Pegasus Planning Group Ltd for Donnington New Homes	Yes - the indicators do provide a relevant measure for the associated objectives.	Noted.
Transport Team, West Berkshire District Council	Yes, the indicators appear to provide relevant means of measurement against the identified objectives.	Noted.
Mid & West Berks Local Access Forum	<p>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.</p> <p>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).</p>	The Council would welcome suggestions.
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.	The Council would welcome suggestions.