

Appendix B

BACKGROUND PAPER

APPROACH TO THE HOUSING SITE ALLOCATIONS DEVELOPMENT PLAN DOCUMENT

Background Topic Paper

Background

The Council adopted its Core Strategy in July 2012. This sets out a housing requirement for the District of 'at least' 10,500 dwellings from 2006-2026. The number was allocated via the Regional Spatial Strategy for the South East (the South East Plan). The regional tier of Government has since been abolished.

The Core Strategy sets out an overall spatial strategy to accommodate this level of housing across the District and in addition it allocates two large strategic sites in Newbury (Newbury Racecourse and Sandford Park).

Whilst the Core Strategy allocates strategic development and sets out strategic policies, it only forms one part of the Local Plan. The Core Strategy does not contain the detail that is needed to complete the planning framework for the District. There is therefore a requirement to prepare additional document/s to allocate non-strategic housing sites across the District and to allocate sites for Gypsies and Travellers.

Non-strategic housing allocations for Newbury and the rest of the District are now being allocated through a Housing Site Allocations Development Plan Document (HSA DPD) in accordance with the spatial strategy of the Core Strategy. This is a more housing focused document than the previously proposed Site Allocations and Delivery DPD which is referred to in the Core Strategy. This background paper explains why this approach is being taken.

The Core Strategy was examined at a time of transition in the planning system. This led to the Inspector examining the Core Strategy committing the Council to a review of needs and demands for housing through a Strategic Housing Market Assessment (SHMA), to comply with the National Planning Policy Framework (NPPF). The Council was committed to this review by the Inspector for several reasons:

- The anticipated revocation of the Regional Strategy, which allocated the housing number for the District, and the timing of this.
- The emergence of the NPPF (March 2012) as the sole higher tier guidance for the preparation of Local Plans, and the key principle within this document to "boost significantly the supply of housing". The NPPF commits the local planning authority to "use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area..." (para 47) unless "...any adverse impacts of doing so would significantly and demonstrably outweigh the benefits...." (para 14).
- The Inspector's conclusion that the Core Strategy did not fulfil the NPPF requirement of meeting objectively assessed needs in full.
- Other evidence sources presented at the Core Strategy Examination that indicate that the level of housing need and demand may be higher than the South East Plan figure of 10,500 net additional dwellings.

Work on the SHMA has begun in conjunction with other Berkshire Authorities. The Council has a statutory duty to cooperate with its neighbouring authorities and it is therefore essential that the review of the SHMA is undertaken in conjunction with them. The output will quantify future housing need and demand for each of the local

authority areas. Neighbouring authorities in Hampshire, Wiltshire and Oxfordshire will also be involved in accordance with the duty to cooperate. The SHMA has to be completed within 3 years of the adoption of the Core Strategy (July 2012) and work is scheduled to conclude towards the end of the year (2014).

This will establish the objectively assessed need for the District, which will inform the longer term housing requirement.

Approach to the preparation of the Housing Site Allocations DPD

West Berkshire Council was originally proposing to progress a Site Allocations and Delivery DPD as set out in the adopted Core Strategy. This was intended to be a more comprehensive document, to sit beneath the Core Strategy and to include details of any additional housing and employment allocations, reviews of settlement and town centre boundaries plus policies for development management.

However, the approach has been altered following discussions about the most effective way to progress non-strategic housing allocations in a plan-led manner whilst undertaking a SHMA to assess the objectively assessed needs of the District and look to the longer term.

Waiting for the outcomes of the SHMA had the potential to delay the housing allocations process for the following reasons:

- The SHMA is being carried out in partnership with other authorities within the Housing Market Area. Following the assessment of the objectively assessed needs, there will be a necessity to discuss and agree the housing distribution across the Housing Market Area before beginning the process of allocating sites.
- A new housing requirement may result in the need to revise the spatial strategy which guides housing distribution in the District. The spatial strategy was based upon the 10,500 housing number as set out in the South East Plan and this will need to be reviewed. Any higher housing number will have implications in terms of how this increased level of housing is distributed across the District, and how this is taken forward through policy documents. Due to the characteristics of West Berkshire, it will not be possible just to pro-rata any additional housing across the District. A higher number will necessitate reassessing the housing distribution and potentially reconsidering the need for additional strategic level development. This would delay the allocations process and affect the Council's ability to maintain a healthy 5 year supply of housing land.
- A new housing number which looks longer term will necessitate a review of the evidence base upon which the Core Strategy is based.

Discussions were initially held with the Planning Inspectorate about how to address these issues in a constructive and timely way through the plan-led system. The Inspectorate suggested that there was a case for some pragmatism in terms of fast tracking the allocation of housing sites through the production of a specific Housing Site Allocations DPD.

This was then followed by discussions held with the Council's Planning Policy Task Group (a Member and officer working group) as to the best way to progress an allocations document. The following options were discussed as potential ways forward, with advantages, disadvantages and risks plus the timescales for the preparation of each explained to Members.

- (1) Option 1: Housing Site Allocations, SHMA, followed by new Local Plan.
- (2) Option 2: Housing Site Allocations, plus selected housing policies, SHMA, followed by new Local Plan.
- (3) Option 3: All Site Allocations plus all Development Management Policies, SHMA, followed by new Local Plan.
- (4) Option 4: New Local Plan based on new Housing Number

Each of the options had, as a key principle, the requirement to complete the SHMA, in partnership, at the earliest opportunity, to help to establish a revised housing requirement for the District, based upon the objectively assessed need figure established by the SHMA. The allocation of gypsy and traveller sites also needed to be taken forward regardless of which option was chosen. This is due to the necessity to put in place at the earliest opportunity a 5 year supply of sites to meet the identified need for gypsies and travellers.

The outcome of these discussions was an agreement to produce a focussed Housing Site Allocations DPD to fast track the allocation of housing sites, provide pitches for gypsies, travellers and travelling showpeople plus review selected housing policies (Option 2). This would allocate the remainder of the 'at least' 10,500 figure in accordance with the spatial strategy of the Core Strategy, with some additional flexibility included within the numbers. This option would enable the Council to boost the supply of housing land at the earliest opportunity in a genuinely plan-led manner, in accordance with the core planning principles in the NPPF (para 17), while taking the opportunity to update selected housing policies.

Regulation 18 consultation

Following the decision on the intended approach, the Council invited comments on the proposed scope and content of the Housing Site Allocations DPD during a six week period between 30 April and 11 June 2014. The comments received have all been summarised and a Council response prepared. These are set out in a separate Consultation Statement.

A number of representations were made which raised concerns about the Council's proposed approach as set out in the Regulation 18 Statement. In summary, these cover the following issues:

- The Core Strategy figure of 10,500 is out of date. It does not reflect the District's objectively assessed need.
- The Council should delay the process and start a Local Plan following the outcomes of the SHMA.
- The figure should be considerably higher (various assessments given) and the DPD should seek to significantly boost the supply of housing in the District.
- The Duty to Cooperate has not been complied with.

There has been a careful consideration of all of the points raised during the confirmation of the Council's approach to the DPD. The information below confirms how the issues raised have been taken into account.

Justification for the Council's Approach

One approach open to the Council was to wait for the completion of the SHMA and then to commence a new Local Plan with a revised housing number, as suggested by a number of planning agents (Option 4 above). However, the Council did not want to delay the preparation of an allocations plan. Delaying would undoubtedly threaten the level of housebuilding in the District and have implications for meeting housing need and for the Council's 5 year housing land supply. It would be likely to lead to speculative planning applications and appeals.

Instead, the Council's approach aims to actively encourage housing delivery by allocating sites through the plan-led system at the earliest opportunity. Preparing a Housing Site Allocations DPD within the framework of the adopted Core Strategy has the benefit of implementing an already adopted framework for this level of development. The approach aids certainty for the community and developers about both the location and quantum of future development in the short to medium term and allows infrastructure requirements to be considered holistically, through partnership working with providers.

A sound figure for the District's full objectively assessed need will be available before the Plan is examined which will in turn lead to a revised and longer term housing requirement for the District following effective cooperation on the spatial distribution with other local planning authorities.

The Council is planning to meet any revised housing requirement in a 2-phased approach.

Phase 1: The Housing Site Allocations DPD will allocate the first proportion of the housing requirement that results from assessing the objectively assessed needs of the District in the short to medium term. The sites will be allocated on the basis of the residual of the Core Strategy's 'at least' 10,500 housing figure (with additional flexibility) in accordance with the spatial strategy of the adopted Core Strategy. Pitch provision will also be made to meet the needs of gypsies, travellers and travelling showpeople. The DPD will also include selected housing policies including those to guide development in the countryside and other selected policies. This DPD will be followed by:

Phase 2: A new Local Plan for the District. This will allocate sites to fulfil the rest of the housing requirement that follows on from assessing the objectively assessed needs of the District and look to the medium and longer term. 1000 units at Sandford Park will contribute towards the longer term requirement. The Local Plan will also review the spatial strategy and include a full policy review.

Paragraph 10 of the National Planning Policy Framework (NPPF) makes it clear that plans and decisions need to take local circumstances into account. The Council considers that the 2-phased approach to addressing the housing requirement of the District is the most pragmatic, reasonable and justified approach to getting an up to date plan in place to allocate housing development. This requirement is emphasised by paragraph 12 of the NPPF.

Additionally, the National Planning Policy Guidance (NPPG) issued by the Government on 6 March 2014 made it clear that local plans may be found sound conditional upon a review in whole or in part within 5 years of the date of adoption. The Council is able to clarify that any additional requirement for allocation of land for residential development to meet a revised housing requirement will not be an issue until later in the plan period and will have been addressed well within that timescale by progressing the Local Plan as timetabled.

The Council has set out timetables for both of these plans within an adopted Local Development Scheme which is publicly available on the Council's website at www.westberks.gov.uk/lds

This shows that the key milestones for their preparation are as follows:

	Consulting on scope of Sustainability Appraisal	Public Participation in the preparation of the DPD	Publication of Proposed Submission Documents	Submission to Secretary of State	Start of Independent Examination	Adoption
Housing Sites DPD plus selected housing policies	September 2013 to October 2013	September 2013 to December 2014	December 2014	April 2015	June 2015	December 2015
West Berkshire Local Plan	April 2015 to May 2015	December 2013 to July 2017	July 2017	February 2018	April 2018	December 2018

Duty to Cooperate

Section 110 of the Localism Act places a legal duty on local planning authorities and other prescribed bodies to cooperate with each other when preparing DPDs in order to address strategic planning issues relevant to their areas.

In May 2014 the Council produced a paper which set out how strategic planning issues would be dealt with as part of the preparation of the Local Plan. In order to take forward the Duty to Cooperate in a holistic way, the draft key strategic issues for West Berkshire both for the Local Plan as a whole and more specifically, the Housing Site Allocations Development Plan Document (HSA DPD) were identified. Agreement was then sought on a finalised list of strategic issues for the HSA DPD and bodies were asked how they would prefer to be involved in dealing with them so that appropriate governance and support arrangements for taking them forward could be established. Details of which bodies were consulted, a summary of the representations received, the Council's response and subsequent outcomes, are outlined in a separate Consultation Statement.

Preparation of the DPD so far

Housing Distribution

The approach to the allocation of housing sites has been to use the spatial strategy of the Core Strategy as a starting point. This distribution has been tested and found sound at the Core Strategy Examination. This sets out an approximate requirement for the four spatial areas of the District – Newbury/Thatcham (including Cold Ash), the East Kennet Valley, the Eastern Area and the North Wessex Downs Area of Outstanding Natural Beauty (NWD AONB). Within the four spatial areas is a settlement hierarchy of urban areas, rural service centres and service villages which have been defined based on the range of facilities and services that they contain plus the role that they play within the spatial area.

Monitoring work from March 2013 (the latest published data) shows the following requirement.

Spatial Areas	Requirement	Completions	Commitments and Sandlesford Park	Remaining
Newbury/Thatcham	6,300	1,932	3,262	1,106
Eastern Area	1,400	283	427	690
AONB	2,000	855	493	652
East Kennet Valley	800	364	166	270
TOTAL	10,500	3,434	4,348	2,718

The requirement is for at least 10,500 additional dwellings in the District. The figures for the spatial areas, apart from in the NWD AONB, are an approximate requirement and there is a need to add in additional flexibility and not see them as precise figures.

It is not necessary to allocate land for the entire remaining requirement shown in the table above. The figure is reduced by including in the supply more recent permissions on medium/large sites, identified sites within settlement boundaries that have been assessed as deliverable or developable and by the inclusion of a cautious windfall allowance. This is set out for the individual spatial areas in Appendix A.

Housing Sites Selection Process

Information on the site selection process for potential housing sites is set out in Appendix B and in the SA/SEA Environmental Report. The site assessment process focussed on those sites assessed as potentially developable in the SHLAA. Criteria were developed to further filter out sites that were not suitable for allocation. A SA/SEA was then carried out on each remaining site, as these were considered to be reasonable alternatives. Further technical information and comments from the parish

and town councils were taken into consideration before officer recommendations for potential allocations were made to the Planning Policy Task Group.

Approach to meeting the requirement for Gypsies, Travellers and Travelling Showpeople

There is a requirement for West Berkshire Council, as the Local Planning Authority, to identify sites to meet the needs of gypsies, travellers and travelling showpeople. The Council is required by national policy to set pitch and plot targets which address the likely permanent and transit accommodation needs in the area, working collaboratively with neighbouring authorities.

To provide the evidence to inform pitch provision, a Gypsy and Traveller Accommodation Assessment (GTAA) has been undertaken. This has been carried out by an independent consultant, using a shared methodology with other Berkshire authorities. The GTAA has assessed the requirement as 14 permanent pitches for gypsies and travellers and 24 for travelling showpeople.

A 'call for sites' for gypsies, travellers and travelling showpeople was carried out between 28 April and 27 May 2014. The Council invited landowners and developers to submit sites they felt were suitable and available for Gypsies and Travellers and Travelling Showpeople. These sites have been assessed in terms of their suitability and the preferred sites are included within the DPD Preferred Options. Details of the approach to site assessments are set out in Appendix C.

Policy Reviews

The need to review policies to guide development in the countryside

The Core Strategy is a strategic document that provides an overall framework for the more detailed policy and site specific proposals to be contained in other parts of the Local Plan. Some of the policies in the previous Local Plan (West Berkshire District Local Plan 1991-2006) have been saved and remain in force as part of the development plan.

Inspectors are still treating the policies as having due weight and the NPPF is clear, at para 215, that 'due weight' should be given to relevant policies in existing plans according to their degree of consistency with the framework.

However, the opportunity is being taken to review the policies that guide development in the countryside through the Housing Site Allocations DPD to ensure that they are up to date and fit for purpose. These do not form part of the current Preferred Options consultation, but instead are due to be reported to full Council on 18 September, with a period of public consultation to follow.

Reviewing the policy on Sandlesford Park

Since the adoption of the Core Strategy in July 2012, new evidence has become available on two specific elements of the Core Strategy policy on Sandlesford Park (CS3). These relate to highways access (where evidence shows benefits to the highways network of additional all vehicle accesses onto Warren Road and to the

A339) and to education provision where updated child yield figures show an increased primary requirement to accommodate pupil numbers arising from the site.

The policy has therefore been updated to ensure that it reflects the most up to date evidence on highways and access. The policy has also been updated to include reference to the need for masterplans for the site to be prepared as part of any planning application to ensure that the site is delivered holistically.

All other aspects of the policy remain unchanged.

Reviewing the Residential Parking Standards

Levels of parking provision and the way in which they are designed are important factors in creating good quality environments where people want to live. The opportunity has been taken to update the parking standards to seek to ensure the delivery of good quality neighbourhoods for West Berkshire. They take into account the guidance set out in the NPPF and the deletion of PPG13, and take into account a range of other publications (including the National Planning Practice Guidance) which reflect best practice.

The standards take into account the following elements:

- Accessibility of the development including-
 - Location
 - Availability of, and opportunities for public transport
- The size, type, mix and use of the development
- Local car ownership levels
- Levels of parking provision at existing developments across West Berkshire
- The Overall need to reduce the use of high-emission vehicles.

The revised residential parking standards are set out in the Preferred Options document.

Reviewing the Settlement Boundaries

Settlement boundaries identify the main built up area of a settlement within which development is likely to be considered acceptable in principle, subject to other policy considerations. While allowing for development, settlement boundaries protect the character of a settlement and prevent unrestricted growth into the countryside. They create a level of certainty about whether or not the principle of development is likely to be acceptable which is helpful for Development Control officers, Council Members, applicants and members of the public.

It is proposed that the settlement boundaries around the settlements within the settlement hierarchy will be re-drawn to include the proposed site allocations. Additional sites which are too small to be housing allocations (typically those which are below 5 dwellings) may also be included within revised settlement boundaries.

Criteria for reviewing the settlement boundaries have been prepared and form part of the preferred options consultation.

The settlement boundaries themselves have not been re-drawn at this stage but will form part of the proposed submission documents, which will be subject to a further period of consultation before submission to the Secretary of State later this year.

Appendix A

Meeting the Housing Requirement

The tables below set out the housing requirement for each spatial area and how this can be met. The requirement for each spatial area other than for the AONB is an approximate requirement; for the AONB it is a maximum requirement, as set out in the Core Strategy.

The latest monitoring data is for March 2013. The information on permissions has been updated only by including sites of 10 or more units and prior approvals (for change of use through permitted development) that have been approved since March 2013. The figures will be updated to reflect the position at March 2014 before the proposed submission document is published.

A windfall allowance has been applied in all spatial areas, based on past trends. In the AONB a windfall allowance has been included up to 2026 because of the housing requirement of “up to 2,000”. In other spatial areas the windfall allowance is that included in the five year housing land supply.

In some areas the preferred options potential allocations are seen as alternative options – there will be further final choices to be made as a result of the current consultation. The figures for potential allocations are therefore approximate at this stage, they will be further refined following the analysis of consultation responses, work on design and capacity of individual sites and decisions on which sites to take forward into the submission version of the DPD. The tables below show potential allocations of sites for up to 2,000 dwellings.

There is flexibility in the housing numbers. The housing requirement for the spatial areas is an approximate one. There is potential to make slight amendments to this distribution to ensure that the overall housing requirement for the District is met in the most sustainable way.

There is also considerable flexibility in the housing supply figures. This includes:-

- Windfall - Other than for the AONB, there is no windfall allowance included beyond the first five years. Windfalls will inevitably continue to add to the supply.
- Residential institutions -The figures have not included any allowance for residential institutions that have been permitted. The national Planning Practice Guidance (PPG) states that local planning authorities should count housing in residential institutions against their housing requirement (ID 3-038-20140306).
- Identified sites, some with planning applications pending determination – Unless these sites have been identified as deliverable or developable in the SHLAA they have not been included in the figures.
- Settlement boundaries - Changes to the settlement boundaries of the settlements in the settlement hierarchy will provide additional opportunities for small scale development.
- Potential flexibility of delivery at Sandlesford Park.

Newbury/Thatcham

Housing Requirement	6,300 approx.
Housing Supply at June 2014	
Dwellings completed at March 2013	1,932
Dwellings with permission at March 2013	2,262
Sandleford Park – allocated strategic site	1,000
Permissions on sites of 10 or more units and prior approvals granted since March 2013	153
Identified sites within settlement boundaries	approx 385
Windfall allowance in 5 year supply	160
Proposed Allocations	
HSA DPD Preferred Options potential allocations	485

Eastern Area

Housing Requirement	1,400 approx.
Housing Supply at June 2014	
Dwellings completed at March 2013	283
Dwellings with permission at March 2013	427
Permissions on sites of 10 or more units and prior approvals granted since March 2013	31
Identified sites within settlement boundaries	110
Windfall allowance in 5 year supply	14
Proposed Allocations	
HSA DPD Preferred Options potential allocations – choices to be made following consultation	Up to 815

AONB

Housing Requirement	2,000 max
Housing Supply at June 2014	
Dwellings completed at March 2013	855
Dwellings with permission at March 2013	493
Permissions on sites of 10 or more units and prior approvals granted since March 2013	7
Identified sites within settlement boundaries	16
Windfall allowance in 5 year supply	129
Windfall allowance 2019 - 2026	240
Proposed Allocations	
HSA DPD Preferred Options potential allocations – choices to be made following consultation	Up to 468

East Kennet Valley

Housing Requirement	800 approx.
Housing Supply at June 2014	
Dwellings completed at March 2013	364
Dwellings with permission at March 2013	166
Permissions on sites of 10 or more units and prior approvals granted since March 2013	0
Identified sites within settlement boundaries	0
Windfall allowance in 5 year supply	54
Proposed Allocations	
HSA DPD Preferred Options potential allocations – choices to be made following consultation	Up to 320

Appendix B: Site Selection Process

As part of the Housing Site Allocations Development Plan Document (DPD) the council needs to allocate sites for housing in conformity with the Core Strategy.

The spatial strategy of the adopted Core Strategy divides the district into four spatial areas, each with an approximate housing requirement. Allocations to each spatial area have to be made in accordance with the District's settlement hierarchy of urban areas, rural service centres and service villages.

A "Call for Sites" was carried out in spring 2013 with the submitted sites being included in the Strategic Housing Land Availability Assessment (SHLAA) which was published later in 2013. The SHLAA is a technical background document; it does not make recommendations about which sites should be allocated. This is the role of the plan-making process, through the DPD.

The role of the SHLAA is to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified housing need over the plan period. The aim is to identify potential sites to choose from.

Sites in the SHLAA were assessed as:

- Deliverable – sites available now, with a realistic prospect that housing will be delivered on the site within the next five years. Sites with Planning permission are considered deliverable.
- Developable – site in a suitable location for housing with reasonable prospect that the site is available and could be viably developed in the future
- Potentially Developable – these sites form the basket of sites' from which the most suitable will be allocated through the DPD. The suitability of the sites needs to be further assessed.
- Not Currently Developable – these sites are considered to have significant constraints that mean the site is unlikely to come forward in the plan period.

The Site Assessment process focuses on those sites which have been assessed as Potentially Developable in the SHLAA.

Site Assessment criteria were developed to assess the sites for their suitability for allocation in the DPD. The criteria have their basis in National (National Planning Policy Framework) and Local (the Core Strategy) policy, focusing on all aspects of sustainability (environmental, social and economic).

This assessment has two phases: Firstly all sites are assessed against 'automatic exclusion' factors. This determines which should progress further and which should be ruled out. These criteria cover significant issues such as where a site is too small to be allocated, or where a site's size would be out of keeping with a settlement's size and function within the settlement Hierarchy. Also included are those sites within the settlement boundary, where there is a presumption in favour of development and therefore no requirement to allocate. Other criteria include factors that make a site unsuitable for development, such as significant flood risk (flood zone 3) or a national or international environmental or historical protection (including SSSIs, SACs, SPAs, Registered Battlefields or Historic Parks and Gardens). The impact on the AONB is also considered at this stage of site selection.

Landscape assessments have been carried out for all SHLAA sites in the North Wessex Downs AONB that have been initially assessed as potentially developable. Where development would fail to conserve or enhance the special qualities or natural beauty of the AONB a site will be ruled out at this stage. The Landscape Assessment is being published as part of the Preferred Options Consultation.

The sites which are not automatically ruled out are then considered against a range of further considerations, set out as detailed criteria.

The list of criteria is shown in appendix 1 with justification for inclusion.

Automatic Exclusion

The Automatic Exclusion ruled out 175 sites as being unsuitable for allocation. 77 of these were ruled out by the SHLAA, with 98 ruled out through the Site Assessment Criteria.

Considerations

All the remaining sites have been assessed against the detailed criteria set out in the 'considerations' part of the site assessment criteria. These look in more detail at the suitability of the site for development and include a wide range of factors from land use, to contamination, to accessibility and capacity (including scope to increase capacity) of local services and facilities. The relationship to the surrounding area and other potential neighbouring sites is also taken into consideration in this section of the assessment (i.e. cumulative impact).

Early consultations were held with a number of technical experts to inform the site selection process. These included Highways and Transport, Ecology, Environmental Health, Archaeology, Thames Water, Environment Agency and the Highways Agency). Their comments have been taken into account as part of the site selection process and in some cases their comments have shown that sites can not be delivered.

This section of the assessment highlights where there could be a significant issue with development of a site, such as access, air quality or noise pollution, archaeological interest, or an ecological designation (e.g. Local Wildlife Site).

All sites not automatically excluded have been subject to the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) process. Full details of the SA/SEA process are set out within the SA/SEA Report.

Parish and Town Council comments

Consultation with Parish and Town Councils on the SHLAA sites within their areas was held in January and February 2014. The comments made by the Parish and Town Councils are included within the Site Assessment, as these identify local factors relating to each site. The comments made are also set out in a separate Consultation Statement.

Appendix B1

A) Automatic Exclusions		
Exclusion Criteria	Details	Justification
Less than 5 dwellings		Site is too small to be allocated, the majority of these sites will be considered as part of the settlement boundary review.
Planning Permission		These sites do not need to be allocated as they already have planning permission
Within flood zone 3		The NPPF states that residential development is not compatible or suitable in Flood Zone 3. Only sites completely in FZ3 have been excluded at this stage. Further details of the flood risk are taken into consideration at the next stage of assessment.
Within significant national or international habitat/environmental/historical protection	SSSI, SAC, SPA, Registered Battlefield Grade 1 / II* Park and Gardens	NPPF states that SSSIs, SACs and SPAs should have the same level of protection as European Sites. Therefore sites within these areas have been excluded. The NPPF also states that great weight should be given to significant heritage assets and their settings, and substantial harm to or loss of designated heritage assets of the highest significance (e.g. battlefield and Grade I and II* registered parks and gardens) should be wholly exceptional, therefore sites which these designations have also been excluded. The Registered Battlefield and Sandford Priory historic park and gardens are included on the English Heritage 'At Risk' Register.
Landscape	Adverse impact on the character of the AONB (from LSA)	The NPPF states that great weight should be given to conserving landscape and scenic beauty in the AONB. Landscape Assessments have been carried out on the sites in the AONB, and where this indicates development would cause harm to the AONB the sites have been excluded.
SHLAA Assessment	Not currently developable	Sites assessed in the SHLAA as not currently developable imply that there are issues with the site that could not easily be resolved within the plan period, or would impact significantly on the deliverability or availability of the site.
Land Use	Protected Employment Land	Areas within a Protected Employment Land designation are protected by policy and without a review of the employment policy it is not acceptable to release land for housing development.
AWE consultation zone	Inner	Government policy limits development within inner Land Use planning consultation zones. This is regulated by ONR. Development within the inner zone is unlikely to receive approval from ONR.
Relationship to the surrounding area	Relative scale in relation to existing settlement	The focus for development is in the Settlement Hierarchy. Within in this each settlement has a role and function. Where the size of a site would be out of keeping with this the site has been excluded.
Within settlement boundary		Sites within the settlement boundary do not need to be allocated as there is a presumption in favour of development.

B) Considerations					
Criteria	Details	Justification	Response		
Land Use	Previously developed land	Sites on Brownfield land are considered more favourably than Greenfield sites.	N Greenfield		Y Brownfield
	Racehorse Industry	Some sites are currently used in the horse racing industry. Core Strategy Policy CS12 Would need to be taken into account if considering allocating a site within the settlement boundary.	Y Site is currently used for Racehorse industry		N Site is not used for Racehorse industry
Flood Risk	Flood Zone 2	Residential development is allowed in FZ2 where there are no alternative suitable sites. Flood Risk assessments and mitigation would be required.	Y In FZ2	A Adjacent to FZ2	N In FZ1
	Groundwater flood risk	Sites within the groundwater emergence zone, or with a history of groundwater flooding are highlighted here	Y In GW emergence zone or history of GW flooding	A Adjacent to GW emergence zone or site with history of GW flooding	N No risk of groundwater flooding
	Surface water flood risk	Sites at risk from surface water flooding, or with a history of surface water flooding area highlighted here	Y In SW flood risk area or history of SW flooding	A Adjacent to SE flood risk area or site with history of SW flooding	N no risk of SW flooding
	Critical Drainage Area	Sites within a Critical drainage area are highlight here	Y In Critical Drainage Area	A Adjacent to Critical Drainage Area	N Outside Critical Drainage Area
Contamination / Pollution	Air Quality	Where sites could be at risk from poor air quality (e.g. site is adjacent to major road / railway line) this is highlighted	Y At risk from poor air quality	U Potential for poor air quality	N No air quality issues
	Contaminated Lane	Where sites have had a previous land use which could have resulted in contamination being present on the site this is highlighted here.	Y Contamination present on the site	U Potential for contamination on the site	N No contamination

	Other				
Highways / Transport	Access issues	Where there are actual or potential issues with access onto a site this is highlighted as this could affect deliverability.	Y Access to the site is an issue	U Potential access issue onto the site	N No access issues
	Highways network suitability	Comments from consultation with internal Highways consultees. Including details on traffic generation and the likely impact on the highway network	Y Significant impact on the highway network	U Unknown/uncertain impact on the highway network	N Limited or no impact on the highway network
	Public Transport Network	Details regarding the public transport opportunities at each site. This does not take into account potential improvements.	N No public transport options	U Limited / intermittent public transport options within a reasonable distance of the site	Y Good public transport options within a reasonable distance of the site.
	Footways / Pavements	Information about the footways / pavements around a site, as this could have an impact on the safety for walking to/from the site	N No pavements or footways near to the site	U Poor quality or intermittent footways / pavements near to the site	Y Pavements serve the site
Landscape	Located in AONB	Some sites within the AONB are suitable for some, sensitively designed, development.	Y Within the AONB	N Outside the AONB	
	Located within an area of High Landscape Sensitivity (from Core Strategy LSS)	Landscape sensitivity work was carried out for the Core Strategy. This section highlights areas where the landscape is highly sensitive.	Y In area of High, medium/high landscape sensitivity	N In area of Medium, Medium/low or low landscape sensitivity	
	Other				
Green Infrastructure	Open Space / Playing fields / Amenity Space nearby	Access to open space, playing fields or amenity space is important for maintaining active healthy lifestyles. Facilities could be provided alongside some sites.	N No facilities within a reasonable distance of the	U Facilities are just within a reasonable	Y Facilities are close to the site.

			site (800m). Or site would remove open space facilities	distance of the site (800m). Or site could impact on open space facilities	
	Rights of Way affected	Development could have a negative impact on the rights of way network. This highlights where care is required to ensure that this does not happen	Y Right of Way passes through the site	U Right of way passes along the site boundary	N No right of ways on or adjacent to the site.
	Play Areas nearby	Access to play areas / facilities for children is important for maintaining active healthy lifestyles. Facilities could be provided alongside some sites.	N No facilities within a reasonable distance of the site (800m).	U Facilities are just within a reasonable distance of the site (800m).	Y Facilities are close to the site.
Ecology / Environmental / Geological	Protected Species	Certain species are protected by national policy and required certain habitats / areas to be maintained.	Y Protected species on the site	U Potential for protected species on the site	N No protected species on the site
	Ancient Woodland		Y Within ancient woodland	U Adjacent to Ancient woodland	N Not near to ancient woodland
	Tree Preservation Orders		Y TPOs on the site	U TPOs adjacent to the site	N No TPOs
	Local Wildlife Site		Y LWS on the site	U LWS adjacent to the site	N No LWS
	Nature Reserve		Y Nature Reserve on the site	U Nature Reserve adjacent to the site	N No Nature reserve

	Other (e.g. BOA)				
Relationship to surrounding area	Relationship to settlement		N Poorly related to the settlement		Y Well related to the settlement
	Incompatible adjacent land uses	Any land use that may not be compatible with residential development adjacent to it (due to pollution, noise generation etc)	Y Incompatible adjacent land use	U Potentially incompatible land use	N Compatible adjacent land uses
Heritage Impact	Archaeology	Protection of heritage assets is a requirement of the NPPF.	Y Significant archaeological material on the site	U Archaeological material on the site, or unknown potential	N No archaeological potential
	Conservation Area		Y Within conservation area	A Adjacent to conservation area	N No conservation area
	Listed Buildings		Y Listed building on the site	A Adjacent to listed building	N No listed building
	Scheduled Monument		Y Scheduled monument on the site	A Adjacent to scheduled monument	N No scheduled monument
Utility Services	Presence of over head cables / underground pipes	Overhead cables or underground pipelines could limit the development potential on a site.	Y Overhead cables / underground pipes on the site	A Overhead cables / underground pipes adjacent to the site	N No overhead cables or underground pipes

	Water supply	Comments from Thames Water. Could impact on the viability of a site where significant improvements are required.	N Concern over water supply infrastructure	U Unknown as TW not consulted on the site	Y No concerns over water supply infrastructure
	Wastewater	Comments from Thames Water. Could impact on the viability of a site where significant improvements are required.	N Concern over wastewater infrastructure	U Unknown as TW not consulted on the site	Y No concerns over wastewater infrastructure
	Groundwater source protection zone (SPZ)	Comments from Environment Agency. SPZ are areas around water extraction boreholes and indicate the amount of time taken for groundwater to reach the extraction point (Zone 1 is closest to the borehole, 3 furthest way). The zones can highlight where there is potential for groundwater sources to become contaminated.	Y In SPZ (including which zone, 1, 2 or 3)	N Not in an SPZ	
AWE consultation zone	Middle	Development near to AWE is restricted in the interest of public safety. Development within the consultation zones needs to be consulted on with ONR in accordance with Core Strategy Policy CS8.	Y Middle zone	N Not within zone	
	Outer		Y Outer zone	N Not within zone	
Proximity to railway line		Network Rail. Need to be consulted on sites adjacent to railway lines.	Y Adjacent to railway line	A Close to railway line	N No railway line
Minerals and Waste	Minerals preferred area		Y Within minerals preferred area	A Adjacent to minerals preferred area	N No minerals preferred area
	Mineral consultation area		Y Within mineral consultation area		N Outside mineral consultation area
	Minerals/Waste Site	Minerals and waste sites could be an incompatible adjacent land use. Some sites are underlain by mineral deposits which could have	Y Within minerals / waste site	A Close to minerals / waste site. Site	N No minerals / waste site

		potential for future extraction.		underlain by deposits with potential for future extraction.	
	Other				
Relationship to / in combination effect of other sites	List of neighbouring sites.	The impact of several sites together could be different to an individual site.			
Other (anything else to be considered)					

Appendix C: Approach to site assessments for Traveller sites

The potential suitability of each site submitted to the Council for consideration as a Gypsy and Traveller or Travelling Showpeople site was assessed to determine which, if any would be suitable to take forward as preferred sites. Existing sites without the benefit of planning permission were also assessed to determine their suitability.

National policy requires local authorities to make their own assessment of need; identify and update annually a five year land supply of deliverable sites; identify a supply of developable sites for 6 – 10 years and 11 – 15 years of the plan period.

A call for sites was carried out in April/May 2014 at which time the Council invited landowners and developers to submit sites they felt were suitable and available as a site for Gypsies and Travellers and Travelling Showpeople. Five sites were submitted during this process and the Council are also considering a further three sites; one unauthorised development, one site which was submitted through the Strategic Housing Land Availability Assessment (SHLAA) process and one Council owned parcel of land, resulting in a total of 8 sites being assessed.

In accordance with the Core Strategy all sites were assessed against the criteria set out in policy CS7.

Core Strategy policy CS7 applies to proposed sites located outside settlement boundaries. Any sites proposed within settlement boundaries are considered acceptable in principle, as with conventional housing, subject to material considerations. Policy CS7 will assist in providing suitably located and designed sites. The Core Strategy policy complies with the Planning Policy for Traveller Sites (PPTS).

Criteria as set out in Policy CS7 of the Core Strategy

Policy CS7 Criteria	Key considerations
Safe and easy access to major roads and public transport services	<ul style="list-style-type: none"> • Whether access is of, or can be made to, an appropriate standard, including consideration of its adequacy, the character, width, alignment and speed of the road • Potential for pedestrian /vehicle conflict on either the access or roads in close proximity to the site – whether there are footways or cycleways, width, visual splays, lighting • Access to public transport and the frequency of the service • Any other highway issues or concerns
Easy access to local services including a bus route, shops, schools and health services	<ul style="list-style-type: none"> • Whether local services, including a bus route, shops, schools and health services are located in a nearby settlement • Distance to key local services (as above) and whether they are accessible by walking and/or cycling or accessible by public transport
Located outside areas of high flooding risk	<ul style="list-style-type: none"> • Whether the site is located within Flood Zone 2 and/or 3

	<ul style="list-style-type: none"> • Whether the site is vulnerable to other sources of flood risk, such as surface water or ground water flooding • Whether evidence suggests there are flood risk issues affecting the site and/or its immediate surroundings
Provision for adequate on site facilities for parking, storage, play and residential amenity	<ul style="list-style-type: none"> • Size of the site • Any existing facilities/structures on the site • Potential number and density of pitches
The possibility of the integrated co-existence between the site and the settled community, including adequate levels of privacy and residential amenity both within the site and with neighbouring occupiers	<ul style="list-style-type: none"> • Distance from the site to nearest residential properties / settled community • Whether the amenity of neighbouring uses would be unacceptably affected by Gypsies and Travellers (noise, light, visual impact, general disturbance etc) and vice versa
Opportunities for an element of authorised mixed uses	<ul style="list-style-type: none"> • Whether a mix of uses and/or alternative uses have been proposed on the site. • Whether the site and its surrounding uses would lend itself to an element of authorised mixed uses.
The compatibility of the use with the surrounding land use, including potential disturbance from vehicular movements, and on site business activities	<ul style="list-style-type: none"> • Type and scale of surrounding uses • Whether the amenity of neighbouring uses would be unacceptably affected by Gypsies and Travellers (noise, vehicular movement etc) • Number of expected vehicle movements from site depending on proposed number of pitches and/or on site business activities
Will not materially harm the physical and visual character of the area	<ul style="list-style-type: none"> • Visual prominence and visual impact of the site • Impact on the character and appearance of the area with regard to the built and natural environment (including local and statutory designations) of the immediate locality and nearest settlement
Where applicable have regard for the character and policies affecting the North Wessex Downs AONB	<ul style="list-style-type: none"> • Whether the site is located within the North Wessex Downs AONB • Whether there is likely to be any impact on features that contribute to the landscape character • Whether development of the site will contribute to the conservation and enhancement of the natural beauty of the landscape

Other issues to consider	<ul style="list-style-type: none">• Any site specific or local issues to be considered
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In addition to assessing each site against the criteria set out within the policy, regard has also been had to the relevant national guidance, including the NPPF and PPTS. A SA/SEA has been carried out on each site to determine the potential effects on social, economic and environmental sustainability.

The site assessments and SA/SEA have then been considered against any technical evidence, supporting information provided with the site submissions and advice from internal consultees to draw conclusions on the suitability of each site for allocation.